Subject: Geolocation in the proposal for a regulation on commodities and products associated with deforestation and forest degradation (COM(2021)0706 - 2021/0366(COD))

The new geolocation requirements in the proposal COM(2021)0706 may pose significant implementation challenges compared to the requirements of the EU Timber Regulation. In particular, operators are required to collect the geolocation coordinates of all land on which the relevant commodities and products have been produced.

What is the Commission’s position on the fact that this obligation to disclose confidential information throughout the value chain may lead to distortions in the timber market?

Moreover, the identification of 'geolocation coordinates' is often not feasible for finished products. It is possible to trace the raw material from the place of felling up to the point of industrial processing, but after that it is no longer possible to link parts of a processed log to a specific felling area.

How does the Commission intend to ensure that this identification is feasible?

Chain-of-custody systems used in third-party certification represent a more sustainable model that should be recognised as one way of demonstrating sustainability. A chain-of-custody system includes measures that define responsibility for the care of materials and products as they pass from one organisation to another in the relevant supply chain. Its purpose is to ensure that the specified characteristics (e.g. that the product is certified) are actually the same as those delivered in the final product.

Will the Commission consider removing geolocation requirements, or at least including certification as one of the ways of demonstrating sustainability?