February 28, 2025

The Honorable Donald J. Trump President United States of America 1600 Pennsylvania Ave NW Washington, D.C. 20500

Dear President Trump,

We, the undersigned, representing the United States forest products value chain, including state forestry agencies, forest owners, forest managers, suppliers and manufacturers who make essential products, urge your Administration to engage with European government counterparts regarding the EU Regulation on Deforestation-Free Supply Chains (EUDR) that will restrict U.S. forest product access to European markets beginning in December 2025.

While the EUDR aims to eliminate products sold in the EU that are linked to deforestation, its stringent and unprecedented bureaucratic obligations are unworkable and disadvantage the U.S. forest products industry, which accounts for approximately 5% of total U.S. manufacturing GDP, employs about 925,000 people, and includes nearly 11 million small U.S. family forest owners. This regulation threatens to disrupt trade with the EU which is valued at more than \$3.5 billion.

Due to stakeholder engagement, implementation of the EUDR regulations has been delayed until December 2025. However, the delay does not address the severe compliance challenges that continue to jeopardize U.S. forest product exports.

The overly prescriptive requirements of the regulation do not recognize the U.S. as a world leader in modern, sustainable forest management. The U.S. forest products industry does not contribute to global deforestation, and already has control mechanisms in place covering our wood fiber inputs. The U.S. Department of Agriculture reports that we grow twice the volume of trees than we harvest. In fact, over the last 10 years, the largest gains in forest land area in the U.S. have been **reversions of agricultural land back into forest.**¹ Extensive USDA analysis and the EU's own Observatory on deforestation and forest degradation correctly show that deforestation in the U.S. is negligible.

A key concern for U.S. forest products producers is the unnecessarily strict geolocation and traceability requirements, requiring us to provide coordinates for all plots of land from which a product shipment was sourced. The size and scope of the U.S. forest products

¹ <u>https://www.usda.gov/sites/default/files/documents/USDA-Assessment-of-Ag-driven-Deforestation.pdf</u>

supply chain makes precise linkage from forest plot to the final product impractical and incredibly costly.

U.S. government engagement with the European Union is needed to address EUDR which represents an overly-stringent, one-size-fits-all non-tariff trade barrier. Unless further changes are negotiated, millions of private landowners, U.S. manufacturing jobs and significant exports to the EU will be put at risk.

We urge you and our U.S. trade advisors to include EUDR on the list of items to negotiate with the European Union. The United States is a global leader in managing forest resources and must be recognized as not contributing to deforestation, or unjustifiably subject to a compliance burden that weakens U.S. forest product producers' access to EU markets.

Sincerely,

Alabama Forestry Association Allegheny Hardwood Utilization Group, Inc. American Cooperage Industries of America American Forest & Paper Association American Forest Foundation American Hardwood Export Council American Loggers Council American Wood Council Appalachian Hardwood Manufacturers Appalachian Lumbermen's Club Arkansas Forestry Association Arkansas Timber Producers Association Associated Logging Contractors of Idaho Associated Oregon Loggers, Inc. Association of Consulting Foresters **Composite Panel Association** Decorative Hardwood Association **Decorative Hardwoods Association Empire State Forest Products** Association Florida Forestry Association Forest Resources Association Forestry Association of South Carolina **Georgia Forestry Association**

Great Lakes Timber Producers Association The Hardwood Federation Hardwood Manufacturers Association Indiana Hardwood Lumbermen's Association Kentucky Forest Industries Association Lake States Lumber Association Maine Forest Products Council Maple Flooring Manufacturers Association Minnesota Forest Industries Mississippi Forestry Association Missouri Forest Products Association National Association of State Foresters National Hardwood Lumber Association National Wood Flooring Association National Woodland Owners Association New England Lumbermen's Association North Carolina Forestry Association Northeast Loggers Association **Ohio Forest Products Association Ohio Forestry Association** Oregon Women in Timber

- Pacific Coast Hardwood Distributors Association Pennsylvania Forest Products Association Penn-York Lumbermen's Club Railway Tie Association Southeastern Lumber Manufacturers Association Southeastern Wood Producers Association Southern Cypress Manufacturers Association Southern Forest Products Association
- Southwestern Hardwood Manufacturers Club Tennessee Forestry Association Treated Wood Council United States Industrial Pellet Association Virginia Forest Products Association West Virginia Forestry Association Western Hardwood Association Wisconsin Paper Council Wood Component Manufacturers Association

CC:

The Honorable Marco Rubio, Secretary of State The Honorable Brooke Rollins, Secretary of Agriculture The Honorable Howard Lutnick, Secretary of Commerce The Honorable Jameison Greer, Nominee for United States Trade Representative