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INTERGRAF

PRESS RELEASE

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INTERGRAF CALLS FOR “STOP THE CLOCK” ON EUDR

Intergraf, the European Association representing the printing industry, calls for a postponement of the EU Deforestation Regulation (EUDR).

While the sector appreciates the efforts made by the European Commission to streamline the legislation by creating the category of ‘downstream operators’ with reduced due diligence responsibility, the proposal entails significant changes for operators along the value chain. These changes are substantial and deserve appropriate time for stakeholders, policy makers and Member States to analyse and discuss them. This is exceptionally difficult considering the deadline of 30 December 2025 currently in place.

Out of the 100,000 European companies in the printing industry, 95% employ less than 20 staff; these small and micro companies will be faced with a much larger number of DDS reference numbers and declaration identifiers as these accumulate along the value chain. According to estimations previously done by the paper industry, one printed book may contain up to 300,000 forest plots - this will translate into an enormous number of reference numbers and declaration identifiers. The processing, allocation and transmission of so many reference numbers are not feasible for our industry. While we agree with the aim of the legislation to safeguard forest and avoid deforestation, we do not see how the processing of such large amounts of data along large value chains will deliver tangible environmental benefits and reduce forest degradation.

We therefore call for removing the obligation to transmit DDS reference numbers and declaration identifiers and replacing it with **aggregated traceability in the form of record-keeping of suppliers and customers (operator’s name, address and in case of export or import the Economic Operators Registration and Identification (EORI) number).**

Furthermore, the proposal fails to reflect the operational reality of the market, where medium-sized and large companies routinely interact with small and micro-enterprises within integrated supply chains. As a result, establishing different application dates – with large and medium-sized enterprises required to comply from 30 December 2025, and small and micro-enterprises benefiting from twelve additional months, will, in practice, force all operators to comply from the same date. The interdependence of companies within the value chain makes the proposed postponement illusory, as smaller operators will be required to align immediately to maintain business relations.

We urge the European Commission to **introduce a “stop-the-clock” mechanism** that allows for policymakers to have a proper and a comprehensive assessment of the Regulation’s impact and implementation. Such a reassessment should aim to identify genuine simplification measures and to render the EUDR obligations truly workable, while fully preserving the Regulation’s legitimate environmental objective of combating deforestation, a goal strongly supported by the printing industry.

– ENDS –

Notes to editor

The **European graphical sector** is made up of some 100,000 printing companies (95% SMEs), which employ 600,000 people, and generate a combined turnover of €80 billion (EU27 + UK, Switzerland, Norway and Iceland).

Intergraf (www.intergraf.eu) is the **European printing industry association**, representing employers in the graphical sector. We are a Brussels-based umbrella federation with 22 members from 21 countries and 14 Associate Members from across Europe. Our primary goal is to represent and advocate for Europe's printing industry, working with European Union to support the sector's competitiveness through advocacy, information-sharing, networking, social dialogue, and European projects.

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