



Japan Machinery Center
for Trade and Investment

29 May 2025

Our Comments on the Draft delegated regulation amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products

Dear Sir or Madam,

The Japan Machinery Center for Trade and Investment (“**JMC**”) is a non-profit organization with the character of a public-interest corporation. It was established in December 1952 in accordance with the Japanese Export and Import Trade Law under the authorization of the Minister of Economy, Trade and Industry of Japan. The objective of the JMC is to engage in activities that enhance the common benefit of member companies and promote the sound development of international trade and investment by the machinery industry. JMC comprises member companies engaged in machinery and systems-related exports and foreign investments such as machinery manufacturers, trading houses and engineering companies. At present, the total number of JMC member companies is about 240.

Our committee handles environmental and product safety issues regarding products for trade and is strongly concerned with overseas environment- and product safety-related regulations on products. From this standpoint, we would like to submit our comments on the Draft delegated regulation amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products.

If you have any questions, please feel free to contact our secretariat (Ms. Akari Shiga, E-mail: shiga@jmcti.or.jp).

Sincerely yours,

Chairman
Environment Law Committee

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JMC comments on the Draft delegated regulation amending Regulation (EU) 2023/1115(EUDR) of the European Parliament and of the Council as regards the list of relevant commodities and relevant products

We welcome the opportunity to contribute to the public consultation regarding the Draft delegated regulation amending Regulation (EU) 2023/1115 (EUDR) of the European Parliament and of the Council as regards the list of relevant commodities and relevant products, published on 4 May 2026.

[Deforestation – proposal to amend and simplify the rules and make technical fixes to Annex I](#)

JMC would like to ask the European Commission to take into account the following proposals in the further regulatory simplification activities:

JMC commends the European Commission’s initiatives toward simplification and remains fully committed to the goal of combatting deforestation. Nevertheless, for packaging auxiliaries and paper products, the existing mandates yield minimal tangible environmental benefits while triggering disproportionate administrative costs and supply chain instability. In the interest of balancing environmental efficacy with operational viability, we submit the following recommendations for improvement:

- 1. Exemption of packaging imported into the EU under an HS code within the scope, which is subsequently used to replace identical packaging that has already been imported into the EU market and that supports, protects, or carries the product contained therein.**

Reason: Packaging for electrical and electronic products generally has a product contained therein and therefore is not imported into the EU under an HS code within the scope. However, a limited quantity of stand-alone packaging imported for the purpose of replacing damaged packaging is classified under HS codes listed in Annex I. Obtaining the required due diligence information from suppliers, especially the geolocation coordinates (latitude and longitude) of the area of production, presents considerable difficulty, thereby imposing a disproportionate administrative burden in relation to such a limited quantity of items. Given that the majority of the identical packaging imported together with products contained therein falls outside the scope of the EUDR, we would like to request that empty replacement packaging, which is intended to replace packaging that has already been imported into the EU, be exempted from the scope.

2. **Exemption of labels, user manuals, and other information materials imported into the EU under an HS code within the scope, where the EU-established importer (namely, the operator) subsequently packages such items with, or affixes them to, products that have already been imported into the EU, prior to supplying them to the immediate downstream retailer for distribution, consumption, or use.**

Reason: These labels, manuals, and information materials would fall outside the scope of the EUDR were they imported in a form packaged with a product. However, in the case of a product designed for worldwide distribution, documents and labels necessary for circulation in the EU are, in some cases, affixed to or packaged with products after importation into the EU. We would like to request that such items, imported separately into the EU but intended to be affixed to, or packaged with, products within the EU, be considered outside the scope of the EUDR.

3. **Relaxation of the requirements stated in Article 9 (1) (d) of the EUDR:**

We would like to request that the following requirements of Article 9(1)(d) of the EUDR be relaxed.

"...the geolocation of all plots of land where the relevant commodities that the relevant product contains, or has been made using, were produced, as well as the date or time range of production; where a relevant product contains or has been made with relevant commodities produced on different plots of land, the geolocation of all different plots of land shall be included; any deforestation or forest degradation on the given plots of land shall automatically disqualify all relevant commodities and relevant products from those plots of land from being placed or made available on the market or exported; for relevant products that contain or have been made using cattle, and for such relevant products that have been fed with relevant products, the geolocation shall refer to all the establishments where the cattle were kept; for all other relevant products of Annex I, the geolocation shall refer to the plots of land."

At the very least, for paper, we would like to request that if information cannot be obtained through the supply chain, the same level of origin information as REGULATION (EU) No. 995/2010 be accepted, namely the following:

- country of harvest, and where applicable,
 - sub-national region where the timber was harvested; and
 - concession of harvest.

Reasons: In the case of paper products, tracing all raw materials back to their specific points of harvest is extremely difficult or even unfeasible owing to the following technical and structural factors.

1) Supply chain complexity

Paper production involves highly fragmented procurement networks and a wide range of processing stages. Wood from different forests is often mixed at the logging site, mixed at the pulp mill, and further blended at the paper mill. As a result, a single sheet of finished paper contains a mixture of wood fibers originating from dozens or even hundreds of different locations.

2) Pulp aggregation

Pulp, the raw material for paper, is usually processed in large bulk quantities for maximum efficiency. Since these materials are physically and chemically mixed during the pulping process, it is impossible to separate the fibers by their origin later on.

3) Individual traceability

Wood fibers are extremely fine, and there is no way to track or tag them individually. Attaching barcodes or chips to track each individual tree is simply not realistic at the current level of technology.

4) Excessive Regulation

In the context of the EU's Omnibus package announced in February 2025, where the revision of the Corporate Sustainability Due Diligence Directive (CSDDD) proposes to accept investigations of direct suppliers as "due diligence."

In contrast, the mandatory "geolocation of all plots of land" (latitude and longitude to six decimal places, with polygon identification for areas over four hectares) required by the current EUDR is considered unfeasible, particularly for products that cross multiple stages of the supply chain.

Please refer to Article 2(28) of Regulation (EU) 2023/1115.

*[Consolidated text: Regulation \(EU\) 2023/1115](#)

The European Commission suggests the utilization of smartphone applications via its published FAQs; however, this approach fails to align with the realities on the ground for producers outside the EU, where EU regulations lack direct jurisdiction.

Particularly in the case of industrial products like paper, producers often do not know where or how their products will be processed or if they will ultimately be sold to the EU. Consequently, gathering detailed information to comply with EU law is extremely difficult. There are concerns that excessive regulation could significantly undermine cost-effectiveness and create unnecessary barriers to international trade.

For these reasons, tracing a single piece of paper back to the specific forest or tree where the raw materials were harvested exceeds both practical and technical limits.

Please refer to the following website for a more detailed explanation:

<https://www.afandpa.org/news/2024/why-eu-needs-reconsider-their-deforestation-law>

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