



CERIS-ULB Diplomatic School of Brussels

Programme:

Executive Master in International Politics

Title of the master thesis: **What explains the preferences of the main stakeholders towards the European Deforestation Regulation?**

First Name & Family Name: *Robine Arnoys*

Supervisor: *Stefano Pagliari*

Session: *September 2025*

Abstract

The European Deforestation Regulation (EURD) will become applicable by the end of 2025 and has the objective of reducing the impact of EU consumption on global deforestation. The success of the policy in achieving this objective will be largely dependent on its stakeholders, as they have a significant impact on the design and implementation of the regulation. It is therefore essential to understand the perception of the stakeholders and to gain insights into the reasons behind their positioning towards the EUDR. This dissertation analysed 291 statements provided during the public consultation on the amendment of Annex I of the EUDR. The aim was to identify the main EUDR stakeholders, their general position towards the regulation and the reasons behind this positioning. The stakeholder mapping exercise identified companies, business associations, citizens and NGOs as the main stakeholders of the policy. Further analysis indicated an overall negative position towards the regulation. This negative sentiment could be attributed to concerns relating to the amendment of products in scope, a lack of guidance combined with an insufficient transition period, an increased administrative burden, and the creation of a competitive disadvantage. To address these concerns, it is essential for policymakers to provide additional regulatory clarity and guidance, investigate simplification options, and guarantee equal competition. Tackling concerns of interest groups is key to increasing stakeholder support and guaranteeing a successful policy implementation.

Introduction

On a global scale, forests are disappearing at an alarming rate. Between 1990 and 2020, the total area of forest that was lost was approximately 420 million hectares, an area comparable in size to the European Union (UN Environmental Programme [UNEP], 2024). In addition to the issue of deforestation, whereby forests are completely destroyed, forest degradation is also a significant problem. The process of forest degradation takes place in case of unsustainable harvesting practices, which consequently lead to a reduction in the forest's capacity with regard to biodiversity and timber production (European Parliament, 2025). The primary geographical areas in which these two processes occur are sub-Saharan Africa, Latin America, and Southeast Asia, as these regions are home to the majority of the world's forest basins (WWF, n.d.). According to a study by the Food and Agricultural Organizations of the United Nations (FAO) in 2020, global deforestation in general is slowing down. This slowdown is also visible in Southeast Asia and South America, but the tropical rainforests in these areas are still under serious threat as deforestation continues to reach record levels. Agricultural expansion is the main driver behind the destruction of forests and accounts for 90% of global deforestation (Food and Agricultural Organisation [FAO], 2020, pp. 1-3). Further factors

contributing to deforestation and forest degradation include urbanisation, over-exploitation of wood resources, and climate change which triggers extreme weather events like droughts, fires and floods (European Parliament, 2025). The protection of forests is of vital importance, as they are key to the health of our planet. Forests provide food and shelter for the vast majority of the land based species, including humans. Millions of people depend on forests for their residence and to provide an income (European Parliament, 2025). Forests also influence rainfall patterns, impacting water and soil quality, which could result in potential floods and droughts. Furthermore, deforestation and forest degradation have an important impact on climate change as it accounts for 10% of global warming (WWF UK, n.d.).

While forest cover within the EU itself increased by 5.3% between 2000 and 2021, a substantial proportion of global deforestation is associated with EU consumption, due to the import of agricultural products such as meat, coffee, and palm oil (European Parliament, 2025). The European Commission has calculated that EU consumption is responsible for 10% of global deforestation, with soy and palm oil accounting for more than two thirds (European Parliament, 2023, pp. 1-5). To mitigate global deforestation and thereby limit climate change, the EU adopted the European Deforestation Regulation, also known as EUDR, in 2023. The EU estimates that the introduction of the EUDR will result in a reduction of 32 million tonnes of CO₂ per year (European Commission, n.d.(a)). The target is consistent with the overall EU Green Deal objective of achieving climate neutrality across the EU by 2050 (European Commission, n.d.(b)).

The EUDR is a demand-side environmental policy instrument that will have a significant impact on global commodity markets, and consequently on economies and societies worldwide (Fisher, Obidzinski, Alves, & Ekaputri, 2024, p. 2). Aside from the fact that the EUDR has a significant impact on stakeholders worldwide, stakeholders also have a substantial influence on the design and implementation of the policy. The impact of stakeholders and the importance of their involvement in sustainable policy-making has been recognised by both the United Nations (UN) and the EU (UNEP, n.d., p. 1 & European Commission, n.d.(i)). The regulation will become applicable by the end of 2025 (European Commission, n.d.(a)). Consequently, it is not yet possible to assess its impact on global deforestation. However, given their pivotal role in designing and implementing the EUDR, the success of this regulation will largely depend on the support and engagement of its stakeholders (Pisano, Lange, Lepuschitz, & Berger, 2015, pp. 10-11). It is therefore essential to understand the perception of the stakeholders and to gain insights into the reasons behind their positioning. This will enable policymakers to address key concerns and incorporate feedback during the design and implementation phase, thereby increasing the policy's potential to fulfil its objectives.

In order to gain further insight into stakeholders' perceptions of the EUDR, this dissertation seeks to address the following research question: “What explains the preferences of the main stakeholders towards the EUDR?”. Firstly, a stakeholder mapping exercise will be conducted using a top-down approach. Stakeholders who have been actively engaged in the policy activity and who provided feedback during a public consultation process will be mapped. Following this, a sentiment analysis will be conducted on the content of their statements in order to ascertain their general position towards the EUDR. The final step will be a more detailed content analysis to identify the reasons for their general position towards the regulation.

Literature study

Policy context

The EUDR is a complex regulation which places substantial responsibilities on supply chain actors, as they have to demonstrate that the commodities they trade are not contributing to deforestation. The regulation, which came into force in 2023 and becomes applicable by the end of 2025, has been the subject of ongoing debate (Politico, 2024). In order to meet the political and industry demands, the EUDR has already been postponed by one year. Certain aspects of the regulation have also been simplified and clarified (European Commission, n.d.(a)). In contrast, other stakeholders have voiced a strong opposition to these aforementioned adaptations (Business & Human Rights Resource Centre, 2024). In order to enhance comprehension of the regulatory implications on stakeholders and facilitate interpretation of their feedback, a detailed examination of the evolution and technical aspects of the regulation will be provided.

The implementation and progression of the EUDR

The EU's ongoing commitment to reduce global deforestation related to its own consumption is a long-standing objective. A first initiative was launched in 2003 with the implementing of the Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan. This initiative led to the publication of the EU Timber Regulation (EUTR) in 2013, which aimed to combat the trade in illegally harvested timber and timber products. The EUTR is considered the predecessor of the EUDR and will be repealed once the EUDR becomes applicable (European Commission, n.d.(d)). In order to consolidate its anti-deforestation initiatives, the European Commission published the document "Stepping up EU Action to Protect and Restore the World's Forests" in 2019. This document outlines the various actions that the EU planned to take in order to tackle deforestation. Different priorities were highlighted, such as reducing the footprint of EU consumption, promoting deforestation-free supply chains, and

supporting the availability of quality data on commodity supply chains and forests (European Commission, n.d.(c)). This broader anti-deforestation action plan, combined with the ambition of the EU Green Deal to make the EU climate-neutral by 2050, resulted in the publication of the European Regulation on Deforestation-free Product (EUDR) (European Commission, n.d.(a)). The EUDR entered into force on 29 June 2023 and was set to become applicable by the end of 2024. However, following strong opposition from politicians and industry, a one-year delay was announced. The EUDR will now become applicable on 30 December 2025 for large and medium-sized companies and on 30 June 2026 for small and micro-sized companies (Politico, 2024 & European Commission, n.d.(a)). Although the regulatory text has been finalised and entered into force, further clarifications and adaptations are still being introduced by means of implementing acts and delegated acts. For instance, an implementing act on the country benchmarking system was published in May 2025 and a draft delegated act to amend the list of relevant commodities was published in April 2025 (European Commission, 2025c & European Commission, 2025d). Both acts have a significant impact on the parties affected and on the manner in which the regulation has to be implemented by its stakeholders. Due to the continuous evolution of the regulation, the EUDR is surrounded by a lot of uncertainty.

General framework and requirements EUDR

The regulation focuses on seven commodities and their derivatives: coffee, cocoa, soy, palm oil, wood, cattle and rubber. The precise list of products that are in scope can be found in Annex I of the regulation (European Deforestation Regulation [EUDR], 2023, Annex I). Any trader or operator placing these commodities on the EU market, or exporting from it, must be able to guarantee that the production of the commodities did not contribute to deforestation or forest degradation. The cut-off date is set on 31 December 2020. Consequently, when a commodity is produced on land that was a forested on or after 31 December 2020, the commodity cannot be sold on the EU market (European Commission, n.d.(a)).

The precise responsibilities depend on the size of the enterprise, the categorisation of the economic actor as a trader or operator, and the enterprise's position in the supply chain. For large (non-SME) operators who are initially placing the commodity or product on the EU market or exporting from it, the obligations are the most stringent. They must implement a due diligence system that will subject their suppliers and supply chains to a due diligence exercise. The following three steps must be taken:

- 1) **Data collection:** geolocation of the plot of land where the commodity was produced, date or time range of production, evidence that the products are deforestation-free, etc. need to be collected (EUDR, 2023, Art.9).

- 2) A **Risk assessment** is to be conducted to determine the probability of non-compliance of the product. The assessment should be based on following parameters: the risk of the relevant country (based on benchmarking system EU), the risk of circumvention, the complexity of the supply chain, etc. (EUDR, 2023, Art.10)
- 3) **Risk mitigation** measures must be implemented in the event of a non-negligible risk being identified in step two. This may entail conducting further audits and surveys, as well as investing in the capacity building of smallholder suppliers (EUDR, 2023, Art.11).

Following the completion of the due diligence exercise, the economic operator is required to create a Due Diligence Statement (DDS) for each batch or grouped batches of the commodity that are placed on the EU market or exported from it. By completing the DDS the operator or trader officially confirms that the batch or grouped batches are compliant with the EUDR, meaning that the commodities are deforestation-free (EUDR, 2023, Annex II). The DDS must be submitted to the EU Information System. In return, a unique DDS number will be assigned to the batch or grouped batches, which should be shared with downstream supply chain partners (European Commission, n.d.(e)).

Operators and traders working with products that fall under the scope of the EUDR will be required to undertake substantial additional work to ensure compliance. The effort required will depend on a number of factors, including the complexity of the supply chain, the number of products involved, the existence of traceability schemes, and the position of the actor within the supply chain.

EUDR - Country benchmarking system

A key element of the risk assessment is the risk level that the EU assigns to a specific producing country. There are three risk categories - 'low risk', 'standard risk' and 'high risk' - that indicate the risk of having non-deforestation free products when sourcing in a certain country. The EU uses a benchmarking system that classifies countries within one of the three categories (European Commission, n.d.(f)). The following criteria are taken into account by the benchmarking system: the rate of expansion of agriculture land, the rate of deforestation, production trends, information submitted by the concerned country and other stakeholders (e.g. NGOs), sanctions imposed by the UN or EU, etc. (EUDR, 2023, Art.29). The assessment is based on the most recent data available from the FAO and will be a dynamic process. A first re-evaluation is foreseen in 2026 (European Commission, n.d.(f)).

The category in which a country falls will have a significant impact on the due diligence exercise that a company must carry out, since sourcing from a low-risk country results in simplified due diligence obligations. This means that the trader or operator is only required to collect the relevant data, without the need to carry out a risk assessment or implement risk mitigation measures. Consequently, sourcing

from a country classified as standard or high-risk results in a higher administrative burden when it comes to EUDR compliance, compared to sourcing from a low-risk country (European Commission, n.d.(f)). This could result in a decline in the attractiveness of countries classified as high or standard risk, with regard to their role as producers of EUDR relevant commodities (Preferred by Nature, 2025). Conversely, standard or high-risk countries may opt to redirect their supply chains to low-risk jurisdiction countries (Fisher et al., 2024, pp. 3-4). This would contradict the EU's objective of reducing deforestation related to agricultural products. Furthermore, enforcement is also dependent on the risk classification. Competent authorities are obliged to check 1% of the economic actors sourcing in low risk countries, compared to 3% for standard risk countries, and 9% for high risk countries (EUDR, 2023, Art.16).

The first published version of the EU's Country Classification List categorises the following four countries as high risk: Russia, Belarus, North Korea and Myanmar. Fifty countries are categorised as standard risk and 140 countries as low risk. The following illustration provides a visual indication of the categorisation of countries (European Commission, n.d.(g) & Preferred by Nature, 2025).

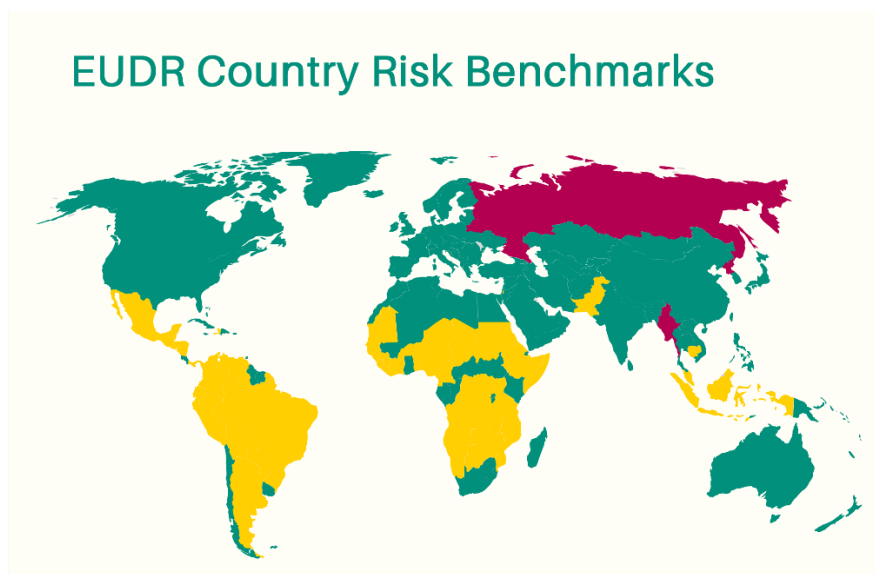


Figure 1: EUDR Country Risk Benchmarking (Preferred by Nature, 2025)

The long-term implications of the EUDR are not yet fully evident. However, certain technical aspects of the regulation, such as the due diligence requirements and the country classification list, are being contested by affected parties. The regulation as a whole is also being criticised. In contrast, there is clear support for the regulation to be implemented promptly and consistently (Business & Human Rights Resource Centre, 2024). These differing stakeholders opinions could further influence the

design and implementation of the EUDR. The various statements that have been raised so far will be the subject of further investigation in the following part, with the aim to provide a clear overview of existing stakeholders' attitudes and concerns.

Attitudes & concerns of stakeholders towards sustainability policies

The potential implications for stakeholders, and the concerns they have raised, have been the subject of discussion in the literature. This chapter will present a summary of the main attitudes and concerns regarding the EUDR, as covered by literature. Given the close connection between the EUTR and the EUDR, comments related to the EUTR will also be considered. The various statements made in literature will be used as a basis for the content analysis in this research.

The legitimacy of the EUDR questioned by producing countries

The question of legitimacy is a concern that frequently arises in literature covering perspectives on the EUDR. Supplier countries that export large quantities of EUDR-relevant goods to the EU are significantly affected by the regulation and are openly questioning the EU's authority to implement such extensive unilateral legislation (Muradian et al., 2025, pp. 5-6). The regulation can be regarded as a form of foreign interference in national policies on land use, which could be perceived as a violation of a country's sovereign rights. The question of whether this aligns with the World Trade Organization (WTO) guidelines is under debate (Durán & Scott, 2022, pp. 246-248). In particular, the alignment of the EUDR with the Technical Barriers to Trade (TBT) principle under the WTO is being contested. The TBT aims to prevent “unnecessary trade obstacles”, such as those imposed by importing countries, which go beyond what is necessary for the policy objective or do not serve a legitimate purpose. The term “unnecessary trade obstacles” is not clearly defined, leaving room for discussion (Muradian et al., 2025, p. 6). In 2023, the Indonesian government, under President Joko Widodo, had plans to pursue legal action against the EU through the WTO. Despite not proceeding with the action, they accused the EUDR of being discriminatory and disguised protectionism. As stated in a joint declaration, the leaders of the Amazon Nation have expressed similar concerns regarding the growing prevalence of environmental policies that they perceive as a means of creating trade barriers (Fisher et al., 2024, pp. 5-6). The compatibility between the EUDR and WTO principles has also been investigated by Durán and Scott (2022, p.261-267). They acknowledge that greater compatibility with the WTO would be advantageous, particularly in the context of the country benchmarking system that differentiates between low-, standard- and high-risk countries. However, they also highlight the fact that WTO compatibility is frequently used as an excuse to avoid the implementation of unilateral trade regulation that address global environmental issues. It is a common misconception that WTO principles prohibit countries from adopting trade-related environmental

measures that have an impact on activities outside the regulating country. Despite ongoing diplomatic tensions, supplier countries are beginning to recognise the EUDR as a reality that they must prepare for in order to avoid the cost of non-compliance (Fisher et al., 2024, p. 7).

Unilateral decision making & insufficient stakeholder dialogue

The unilateral development of the policy, with limited input from supplier countries, has led to ongoing diplomatic opposition. In 2023, seventeen countries, including Brazil, Ghana, Nigeria and Colombia, issued an official letter to the EU, expressing their concerns regarding the absence of dialogue. The signatories emphasised that local circumstances, countries' capacities and national legislation were disregarded (Green European Journal, 2024 & Fisher et al., 2024). This top-down approach, where the EU is using its market power to pressure other countries to align with its environmental ambitions, has been criticised for being paternalistic and a form of "green colonialism" (Almeida, 2023 & Dorn, 2022). Furthermore, due to its unilateral nature, the EUDR is not fully harmonised with other international deforestation regulations. This may result in regulatory disparities and could create additional challenges for economic actors operating in global supply chains (Ezeofor, 2025, pp. 10-15).

EU taking responsibility and leading the way in halting deforestation

In contrast with the previous statements, valid arguments have been put forward in favour of the EU which justify the unilateral policy-making. For instance, the policy can be regarded as the EU taking responsibility for consumption-related deforestation and avoiding complicity in global deforestation (Durán & Scott, 2022, pp. 257-261). Muradian et al. (2025, pp. 5-6) also argue that the EUDR can be justified on the grounds of the insufficient outcome of the Voluntary Partnerships under the EU FLEGT and due to a lack of an adequate global forest framework. The EUDR has the potential to address this policy gap by setting a global standard for the regulation of deforestation-sensitive products. The generation of an EUDR based "norm cascade" could encourage other countries to establish similar initiatives. This phenomenon has been previously observed in the case of the EU FLEGT initiative, which resulted in the adoption of similar legislation focused on the legality of timber in other major timber-trading countries, including Japan, Canada and Australia (Durán & Scott, 2022, pp. 257-261). Furthermore, the EUDR can be considered a vital instrument in halting the race to the bottom for environmental standards in certain producing countries (Muradian et al., 2025, pp. 5-6).

Lack of guidance and insufficient transition period

In relation to both the EUTR and EUDR, stakeholders highlighted a lack of guidance on how to comply with the regulations. Giurca and Jonsson (2015, pp. 683-685) demonstrated that, in the case of the EUTR, this concern is primarily raised by businesses and trade-related organisations. They have expressed concerns regarding the absence of guidance on operational level, particularly in relation to the exercise of due diligence. This has led to a degree of uncertainty surrounding the regulation. A study by Fisher et al. (2024, pp. 7-8) concentrated on preliminary indications for the EUDR reached the same conclusion. Concerns regarding a lack of information and inadequate EUDR guidelines have been expressed by civil society organisations and governments of supplier countries. Additionally, the limited time foreseen for implementation has been criticised by stakeholders. In response to the increasing demand for additional preparation time, the EU formally decided in December 2024 to delay the implementation of the EUDR by one year. Consequently, the EUDR provision will become applicable on 30 December 2025 instead of 30 December 2024 (European Council, 2024).

Disproportionate implication for smallholders and SMEs

Another recurring concern in the literature is the potential impact of the EUDR on smallholders, SMEs, and local communities in supplier countries. It is estimated that around one billion hectares, representing a quarter of the world's forests, are managed by indigenous peoples and local communities. Around 500 million farms worldwide have an area of less than two hectares. These smallholders are often very vulnerable, with their livelihoods depending on their level of integration in global supply chains (Zhunusova et al., 2022).

Research relating to the EUTR and the EUDR, has been conducted around the potential adverse impact on smallholders of environmental policies that intervene through supply chains. Giurca and Jonson (2015, pp. 683-685) emphasise the potential financial implications of EUTR compliance, particularly for small-scale loggers in developing countries. Furthermore, research by Fisher et al. (2024, p 5-6) predicts that smallholders may encounter challenges in meeting the regulatory EUDR requirements, which could potentially result in their exclusion from global trade. This issue has been acknowledged by Cesar De Oliveira et al., (2024, pp. 6-9), as their research indicates that smallholders in Brazil who produce cocoa and coffee, despite having a low deforestation risk, are still facing significant structural, financial and technical barriers to becoming EUDR compliant. This could result in a situation where smallholders are obliged to shift to local markets, where prices are often lower, as they are excluded from the international supply chain. Large suppliers are better placed to meet EUDR requirements and could continue to sell on the global market (Carlson et al., 2018 &

Garret et al., 2021). Previous initiatives aimed at halting deforestation through supply chain intervention have often overlooked the capacity disparity between small and large economic actors. This has consequently led to the exclusion of more vulnerable suppliers (McDermott et al., 2022). Another potential outcome is that smallholders may find themselves increasingly reliant on large market players. This could result in more pressure to accept poor conditions in order to be integrated in vertical commodity chains (Fisher et al., 2024, pp. 4-5).

Challenges have not only been identified for non-EU smallholders and SMEs, but also EU SMEs are considered a vulnerable party. Estimates indicate that 90% of all EU operators targeted by the EUDR are SMEs (European Commission, n.d.(j)). As was observed during the implementing of the EUTR, SMEs are more likely to lack the financial resources to become compliant and may experience difficulties in understanding their exact obligations. The EU took these concerns into account during the development of the EUDR, which resulted in simplified requirements for SMEs. However, significant challenges for EU SMEs to become EUDR compliant are likely to persist (Grishchenko, 2025, pp. 14-15).

Concerns about potential leakage effects

As the EUDR is a demand-side policy that intervenes in the supply chains, questions arise as to whether certain leakage effects might undermine the EUDR's primary objective. This leakage effect may occur when there is disproportionate focus on regulatory compliance rather than addressing the root causes of deforestation (Muradian et al., 2025, pp. 8-10).

One potential outcome of the EUDR is a shift in the global trade system towards countries with less stringent regulations (Köthke, Lippe, & Elsasser, 2023). Countries and suppliers not complying with EUDR regulations may seek to re-route their supply chains to less regulated countries. This could result in a "clean" and "dirty" supply chain. Commodities that are considered "clean", because it can be proven that they are deforestation-free, will be sold to eco-sensitive markets. In contrast, "dirtier" non-compliant commodities will be sold to markets with lower environmental standards or to local markets (Fisher et al., 2024, pp. 3-5). This scenario will result in a significant market disturbance, but will not address the issue of deforestation. Another potential leakage effect is that suppliers may produce commodities which are not subject to the EUDR. This could allow them to continue deforesting land. Furthermore, farmers have the option of relocating their production to areas that are not classified as a "forest" under the EUDR, but which may still contain valuable ecosystems (Muradian et al., 2025, pp. 8-10).

Weak law enforcement and penalties

NGOs have highlighted weak penalties and insufficient law enforcement as a critical issue relating to EUTR. Originally, NGOs have been one of the main supporters of the EU FLEGT and EUTR. However, following the introduction of the EUTR, NGOs have expressed increased scepticism, accusing the EUTR of lacking sufficient enforcement and therefore being ineffective in halting illegal logging (Giurca & Jonsson, 2015, pp. 683-685). In fact, less than 1% of imported goods were checked for illegal logging (Fisher et al., 2024, p. 4). Furthermore, the lack of consistency in the application of penalty systems across different member states has had a negative impact on the effectiveness of the regulation (Giurca & Jonsson, 2015, pp. 683-85). The research conducted by Köthke et al. (2023) concluded that the EUDR closed certain loopholes compared to the EUTR. For instance, the EUDR obliges digital registration of due diligence statements which can be easily controlled by customs authorities. Moreover, the possibility of various interpretations by member states has been reduced, which should result in a more streamlined control and enforcement within the EU. However, concerns about the EU's capacity to fully enforce the EUDR persist (Fisher et al., 2024, pp. 3-5).

Bureaucracy and demand for simplification

Concerns regarding bureaucracy and additional administrative burden, have already been raised by businesses and trade-related organisations in connection with the EUTR. They asserted that the emphasis was too much on legal compliance instead of achieving sustainability. Furthermore, there was a concern that the EUTR would result in significant extra costs and administrative obligations (Giurca & Jonsson, 2015, pp. 683-685). The EUDR, in comparison with the EUTR, has a much larger scope and additional reporting requirements. It is therefore likely that this will result in a considerable increase in administrative burden for companies (Köthke et al., 2023). The EU imposes a due diligence requirement on operators placing goods on the European market. In theory, this means that the majority of the administrative burden and implementation costs will fall on this group. However, in practice, given the high degree of concentration in the trade of EUDR-relevant commodities, dominant international corporations are likely to pass the compliance burden and cost to the more vulnerable upstream actors (Grabs & Carodenuto, 2021, pp. 9-10).

There is an increasing resistance to the EUDR within the EU itself. A key motivation behind this is the goal of minimising the administrative burden on EU economic stakeholders. In 2024, a group of agricultural ministers from EU member states proposed simplification to the EUDR and requested an exemption for EU farmers (Fisher et al., 2024, p. 6). The growing opposition to bureaucracy is not specific to EUDR, but is a general trend within the EU as a whole. The objective of reducing company-level administrative burden is one of the key priorities of Ursula von der Leyen second term

2024-2029 (Ylönen & Erkkilä, 2025, pp. 1-2). In line with this principle, the European Commission published the “Omnibus Simplification Package” in May 2025. The objective of this initiative is to reduce bureaucracy across the EU and simplify the regulations for businesses, while maintaining high levels of environmental and consumer protection (European Commission, 2025c). With regard to the EUDR, certain simplifications were introduced in April 2025 to reduce complexity and the administrative burden for companies. Additionally, a public consultation was carried out concerning a draft delegated act to further clarify and simplify the scope of the EUDR (European Commission, n.d.(a)).

Competitive advantage

For a number of countries and economic actors, the regulation is expected to result in a competitive advantage. One of the key reasons for this is that the country benchmarking system is likely to have a significant impact on supply chain decisions. Muradian et al. (2025, pp. 11-12) assume that traders will seek to minimise compliance costs by sourcing from suppliers in low-risk countries. The EUDR will therefore lead to an increased demand for products from low-risk areas, creating a strong market advantage for these countries and their producers. With regard to the EUTR, comparable arguments were raised in favour of the policy. Specifically, representatives from European and North American trade-related organisations expressed their support for the regulations, citing the positive impact on their suppliers due to the negligible risk status in their respective countries. Moreover, certain trade-related organisations anticipated that the EUTR would reverse the undermining of sustainable forestry by illegally sourced timber on the international market (Giurca & Jonsson, 2015, pp. 683-685).

Furthermore, competitive advantage can also be based on the readiness to accommodate the EUDR policy changes of certain sectors or business operators. Sectors in specific countries that already have a traceability and legality identification system are in a much better position to swiftly adopt EUDR requirements. This is the case for the Indonesian timber sector. Research by Fisher et al. (2024, pp. 5-6) indicates that the Indonesian timber sector is highly prepared to become EUDR compliant, due to the introduction of a national timber legality assurance system (SVLK) in 2009 and the FLEGT Voluntary Partnership Agreement with the EU in 2013. This will provide timber suppliers in Indonesia with a competitive advantage in the market, particularly when compared to operators from less prepared countries. A similar disparity can be seen between types of business operators. Operators that have already implemented voluntary certification schemes or traceability systems are better placed to become EUDR compliant. In practice, these are mainly larger companies (Cesar De Oliveira et al., 2024 & Fisher et al., 2024).

Competitiveness disadvantage

While certain economic stakeholders estimate that the EUDR will have a positive impact on their competitiveness, the reverse argument is equally valid. The EUDR's potential to adversely impact competitiveness at the corporate or country level is a recurring concern that has been identified in literature. Concerns are often linked to the country benchmarking system. Suppliers operating in high- and standard-risk countries, are confronted with additional compliance costs and administrative hurdles, compared to suppliers in low-risk countries. Consequently, high- and standard-risk countries are at a competitive disadvantage (Muradian et al., 2025, pp. 11-12).

Furthermore, it is anticipated that specific sectors and types of business operators who are not adequately prepared will encounter greater difficulties in achieving compliance. For instance, 90% of the coffee, rubber and cocoa industry in Indonesia is managed by smallholders. The aforementioned sectors and smallholder in general are significantly behind in implementing traceability systems, particularly in comparison to the Indonesian timber sector. The threshold for achieving EUDR compliance is therefore considerable, which consequently results in a disadvantageous market position (Fisher et al., 2024, pp. 5-6).

Within the EU, there is also a growing concern that overly stringent environmental regulation would reduce the EU's overall competitiveness in the global market (Dechezleprêtre & Sato, 2017, pp. 183-186). Competitiveness concerns are a primary driver of the ongoing trend towards deregulation within the EU, which is currently a key priority for the European Commission (Ylönen & Erkkilä, 2025, pp. 1-2). The introduction of more stringent environmental legislation could result in increased production costs, which may be passed on to consumers or lead to the relocation of production to less stringent areas. This would have a negative effect on the competitiveness of companies operating within the EU and the EU economy as a whole (Dechezleprêtre & Sato, 2017, pp. 183-186).

Involvement of stakeholders in sustainability policy making

The European Union considers stakeholder engagement to be a fundamental principle and is committed to incorporating it into the design and implementation of its sustainability policies. This principle has also been applied to the EUDR, as the EU actively aims to involve the affected parties in certain aspects of the policy development (European Commission, n.d.(i)). The emergence of the concept, the reasons behind applying this principle and how the EU intends to capture the stakeholder preference towards the EUDR will be further discussed.

What is stakeholder engagement and why is it important?

Stakeholder engagement is defined as the process by which an organisation includes people and/or institutions who can impact a decision or the implementation of an initiative, as well as involving those who are most affected by the decision (UNEP, n.d., p. 2). In other words, a wide range of actors, including citizen, NGOs, social partners, business representatives, academics and authorities, are able to participate in the policy- or decision-making process (European Commission, n.d.(h)).

Stakeholders are able to participate in a variety of ways, depending on the scope and objectives of the participation process. A number of dimensions of this process can be distinguished. A first dimension is the degree of engagement, in which participation can be categorised as either informative, consultative or collaborative (World Resource Forum, 2020, p. 7). Secondly, stakeholders have the opportunity to provide input on either the overall policy strategy or specific aspects and sub-parts of the policy. Furthermore, stakeholder participation can take place in an ad-hoc manner or can be institutionalised. The political level, ranging from local to subnational, can also vary, and participation may be restricted to specific stakeholder groups. Finally, stakeholder involvement can take place at different stages of the policy cycle, including the design, implementation and review phase (Pisano et al., 2015, pp. 7-10).

Effectively involving stakeholders is crucial for a sound design and implementation of the policy (UN Development Programme [UNDP], 2017, p. 4). This approach fosters a diversity of perspectives and ideas, thereby facilitating a more comprehensive understanding of the subject matter (Austrian Society for Environment and Technology, 2007, pp. 11-12). An in-depth and collective understanding of the subject will lead to a more customised and enhanced policy design. It is also possible to identify certain advantages when implementing the policy. For instance, the involvement of a greater number of individuals will increase the probability of accommodating conflicts and will enhance project acceptance and ownership (UNDP, 2017, p. 4). From the perspective of the stakeholders, participation provides the opportunity to influence policy-making and to remain informed about the latest developments (Austrian Society for Environment and Technology, 2007, pp. 11-12).

In addition to the aforementioned benefits, engaging with stakeholders can also result in adverse consequences. For instance, the subjects may be too technical, requiring specialised knowledge and thereby excluding a part of the affected stakeholders. Participation entails costs and usage of resources for both participants and the organiser. Furthermore, selecting the relevant stakeholders and ensuring legitimate representation can be challenging (Pisano et al., 2015, pp. 10-11).

Sustainability policy making and stakeholder engagement

Since the emergence of the concept of sustainable development, the involvement of various stakeholders in the decision-making process and implementation phase has been a core principle (Middlemiss, 2014, p. 930). A key reason for this is that the concept of sustainable development is complex and not easily understood. As argued by Jordan (2007, pp. 28-29), the end goal, meaning how a sustainable future would look like, is not clearly defined. Despite a potential consensus on the core meaning of sustainable development, there are still many contested and unresolved questions regarding the underlying causes of the current unsustainable situation. This uncertainty necessitates a dynamic governance system that incorporates a continuous process of discussion and dialogue between all affected parties (Pisano et al., 2015, p. 5). Middlemiss (2014, p. 930) raises two further points in support of the inclusion of the public in sustainable development decision-making. Firstly, people are more likely to commit to an initiative to which they have contributed collectively. Secondly, achieving sustainability requires a change in lifestyle. It is therefore recommended to involve the public in order to motivate them to mitigate environmental damage due to unsustainable consumption.

The principle of stakeholder involvement in sustainable development decision and policy-making has also been highlighted by the UN (UNEP, n.d., p. 1). This principle has been incorporated in multiple UN sustainability policy documents. For instance, Agenda 21, which was adopted in Rio de Janeiro in 1992 during the UN Conference on Environment and Development (UNCED), emphasises that governments should strengthen community participation in achieving optimal land use management (UN AGENDA 21, 1992, par. 14.40-14.41). This position is further reinforced by the 2012 Rio+20 Outcome Document, entitled “The Future We Want”. In this document, the UN underscores the importance of the active involvement of the public, civil society, and various governmental entities in the promotion of sustainable development (UN Future We Want Outcome Document, 2012, par. II-B). As stated in Article 43 of the document, the UN encourages active stakeholder participation in processes that contribute to the planning, decision-making, and implementation of programmes and policies for sustainable development (UN Future We Want Outcome Document, 2012, Art.43). The UN recognises stakeholder participation as a fundamental principle of sustainable development and as an objective in its own right (UN Economic and Social Commission for Asia the Pacific [ESCAP], 2018, p. 2).

The EU has integrated this stakeholder engagement principle into its own sustainable development policy-making process. In 2006, the EU adopted the EU Sustainability Development Strategy (EU SDS), which formally incorporated stakeholder participation into its framework (European Commission, n.d.(i)). Furthermore, the EU aims to facilitate insightful debates through a multi-

stakeholder platform (European Commission, 2018). The EU's objective is to foster open and democratic societies that respect the right of its citizens to access information. In addition, they aim to engage citizens in the decision-making process to raise awareness and to educate the public on the sustainable development topic. Moreover, the EU considers it essential for businesses to be involved in the policy-making process to achieve a more sustainable consumption and production model (Pisano et al., 2015, p. 16).

Online public consultations are a tool that EU policymakers frequently utilise to engage with stakeholders. This approach enables regulators to gain insight into stakeholders' support for specific policy measures and to better understand their concerns and preferences. This strengthens the policy legitimacy of bureaucracies and creates a significant informational advantage (Bunea, Wüest, & Lipcean, 2025, pp. 755-756). Public consultations tend to attract a wide range of stakeholders and a broad spectrum of preferences being expressed, which suggests a high level of representation (Hanssen, 2022, p. 1). According to Bunea et al. (2025), a potential disadvantage of this approach is that the involvement of a wide range of stakeholders may result in a substantial volume of information, which could potentially lead to information overload. This is certainly the case when feedback is requested on a number of complex subjects. An information overload could result in a chaotic policy input with low informational value. Aggregating a substantial amount of unstructured stakeholder feedback is necessary to capture the public's sentiments and create an in-depth understanding of stakeholder preferences. This is a fundamental aspect of effective policy design and implementation.

A number of studies have been conducted, using different methodologies, in order to capture the broad variety of stakeholder preferences towards EU sustainability policies. For instance, a study by Fiala, Jacob, Barnickel, and Feindt (2024, pp. 1-3) used a deductive-inductive content analysis method to examine the 164 statements made during the public consultation concerning EU's Farm-to-Fork Strategy. The objective was to provide valuable insights into how actors framed the food system transition and which concerns emerged when implementing the new strategy. In addition, a study by Fujiwara, Karakosta, Szpor, Tuerk, and Hofman (2015, pp. 3-5) aimed to capture stakeholder preference towards the EU Emission Trading System (ETS), and organised their own public consultation. The researchers conducted 50 interviews with EU-based stakeholders to ascertain their views on predefined ETS-related issues. An alternative approach has been used by Borchardt, Trane, Cisternino, and Marelli (2025, pp. 1-4). In their study on the perception of the European Green Deal, they conducted a sentiment analysis on 582,156 statements being made on Twitter/X to gain insights into the evolution of public sentiment towards the policy.

Stakeholder involvement in design EUDR

The ambition of involving stakeholders can also be noticed in the context of the EUDR. To date, the EU has employed three different approaches to involve stakeholders in the EUDR policy development. These three approaches differ in terms of objectives, the manner in which they engage with stakeholders, and the phase of the policy process they focus on.

In 2017, the EU has established a multi-stakeholder platform on Protecting and Restoring the World's Forests that assemble on several occasions throughout the year (European Commission, n.d.(a)). The platform provides advice to the Commission in preparation of policy initiatives to protect forests, assists with the implementation of policies, exchanges best practices across stakeholders, etc. Initially, the focus of the group was on the EUTR and the FLEGT Regulation. Subsequently, the group proceeded to provide guidance on the EUDR (European Commission, 2025b). The platform comprises 62 participants, including individual experts, organisations, member state authorities, and other public entities. The participants are invited by the EU to participate (CIRCABC, 2023 & European Commission, 2025b).

Furthermore, a first consultation round was organised in 2020 using a questionnaire. This was prior to the publication of the Commission's EUDR proposal in 2021. The purpose of this consultation was to gather input for an impact assessment, which investigated various demand-side measures to address deforestation and forest degradation associated with EU consumption (European Commission, 2020). All interested parties, including associations, economic operators, NGOs, EU public authorities, third-country stakeholders and citizens, could fill out the questionnaire. A total of 1,150 unique responses were further considered by the EU (European Commission, 2020).

The second public consultation round took place after the publication of the EUDR and was organised in April and May 2025. Stakeholders were invited to share their feedback on the "Amendment of Annex I to the Deforestation Regulation" (European Commission, 2025a). Annex I provides a detailed overview of the products that fall within the scope of the EUDR (EUDR, 2023, Annex I). The Commission now aims to adapt this list, and published a draft of the delegated regulation, on 15 April 2025, amending Annex I of the EUDR. The objective of this initiative, is to reduce unnecessary administrative burden and to ensure clarity on which products are in scope (EU Draft Delegated Act Amending Regulation 2023/1115, 2025, pp. 2-4). All interested parties could submit their feedback via the Better Regulation EU portal. A total of 291 stakeholders provided feedback (European Commission, 2025a).

Methodology

Stakeholder mapping

A top-down approach was used to map and analyse the different stakeholders. Berkhout, Beyers, Braun, Hanegraaff, and Lowery (2017, pp. 44-56) describe the top-down stakeholder mapping approach as a way to map stakeholders engaged in political activity related to a specific policy issue. This approach contrasts with the bottom-up approach, which maps interest groups, for example via lobby registration, irrespective of a specific policy-making trajectory. A potential disadvantage of this mapping approach, is that certain interest groups are excluded on the basis that they did not participate in the policy-making process. Consequently, these groups were not considered for the stakeholder mapping or the further content analysis. This dissertation analysed and mapped the stakeholders who provided feedback during the public consultation round organised in April and May 2025 relating to the amendment of Annex I of the EUDR. The following three characteristics were mapped for all the respondents: type of actor, EU/non-EU, and country.

The public consultation was selected as the source for the analysis because it represents the most recent stakeholder involvement initiative organised by the EU, and it took place after the EUDR was published. Due to the preliminary implementation stage of the regulation, a comprehensive analysis of the potential impact on stakeholders cannot yet be conducted. However, assessing how the EUDR is currently understood by its stakeholders, and interpreting their feedback and concerns, is of paramount importance for further policy design and a successful implementation. The purpose of the public consultation was to receive feedback on a specific part of the regulation, namely the proposed amendments to the list of products in scope. However, the majority of stakeholders took the opportunity to share their feedback on different aspects of the regulation or on the regulation in general. Therefore, the 291 statements can be considered a useful source for further analysis in this dissertation.

Sentiment analysis

In order to ascertain the general position of stakeholders towards the EUDR, a sentiment analysis was conducted on the 291 provided statements. Sentiment analysis, also known as opinion mining, is a method of analysing people's attitudes, sentiments, and opinions in relation to entities such as organisations, issues, individuals, and events (Liu, 2012, p. 1). Large Language Models (LLMs), in the form of the Generative AI tool Copilot, were used to support the analysis of the different statements. Research by Krugmann and Hartmann (2024, pp.17-18) demonstrate that the performance of Generative AI LLMs is comparable to that of traditional transfer learning models used for

sentiment analysis. The statements were categorised based on the following aspects: “opening tone”, “support for EUDR goals”, “number of recommendations”, “operational concerns”, and “tone and framing”. All stakeholder opinions were classified into one of the following five sentiment categories: “positive”, “rather positive”, “neutral”, “rather negative”, and “negative”. The prompt that was used to conduct the analysis with LLMs is provided in Annex III.

Content analysis

In order to gain further insight into the reasons behind certain sentiments regarding the regulation, a content analysis was conducted on the 291 responses to the public consultation. According to Clark, Foster, Bryman and Sloan (2021, p. 272), a content analysis is a method of systematically analysing texts using predetermined categories to quantify their content. Two approaches were combined within this content analysis. Firstly, a deductive approach was applied to derive opinions and statements from literature, which were then coded in standard opinion categories (Giurca & Jonsson, 2015, pp. 682-683). The following opinion categories were derived during the literature review:

- The legitimacy of the EUDR questioned
- Unilateral decision making & insufficient stakeholder dialogue
- EU taking responsibility and leading the way in halting deforestation
- Lack of guidance and insufficient transition period
- Disproportionate implication for smallholders and SMEs
- Concerns about potential leakage effects
- Weak law enforcement and penalties
- Bureaucracy and demand for simplification
- Competitive advantage
- Competitive disadvantage

Two additional categories were included. The first category, entitled “Comments on amendment scope”, was used to categorise feedback on the amendment to Annex I, as this was the initial purpose of the public consultation. Furthermore, the “Others” category was included to accommodate the remaining opinions.

Thereafter, a hermeneutic approach was used to identify the coded opinion categories by interpreting the stated feedback of stakeholders (Giurca & Jonsson, 2015, pp. 682-683). The responses of the 291 stakeholders who participated in the public consultation round concerning the amendment of Annex I of the EUDR have been interpreted. Their opinion statements were subjected

to a profound analysis in order to identify the aforementioned coded opinion categories. This provided insights into their preferences regarding the regulation.

Results and Discussion

EUDR stakeholders

Figure 2 underneath and Table 1 in Annex I provide a detailed overview of the groups of stakeholders that participated in the public consultation. The EUDR is a regulation put in place by the EU, which creates new obligations for EU actors. This is clearly reflected in the stakeholders who provided feedback, as 249 out of 291 statements are from EU actors. The majority of respondents, 74%, are comprised of companies and business associations. 64% of the companies and business associations surveyed were from the EU, while 10% were from outside the EU. According to the EUDR, responsibility lies with EU companies to ensure that their supply chains are deforestation-free. All EU companies trading in EUDR-relevant commodities or products are required to gather substantial data on their supply chain and use this data to exercise due diligence. The EUDR's primary focus on the EU industry is clearly reflected in the high level of EU industry representation in the public consultation. The non-EU industry is also relatively well represented in the consultation. While they are not the primary focus of the regulation, they are likely to be impacted by it. For instance, they may receive requests from their EU trading partners to provide detailed information on their products. Should they wish to continue selling their products on the EU market, they will be confronted with an increased administrative workload. Furthermore, the country benchmarking list will also affect non-EU countries and their companies, since EU companies may be less inclined to source from high- or standard-risk countries. 15% of respondents are citizens, making them the third-biggest group after industry representatives. Although citizens are not directly targeted by the EUDR, a certain number used the consultation to share their thoughts on the regulation and to provide feedback. Additionally, 14 NGOs and two environmental organisations provided their feedback, representing 6% of the statements. Of the 14 NGOs, 11 are focused on defending social or environmental rights. The remaining groups — public authorities, academic/research institutions, trade unions and others — represent only 6% of the statements.

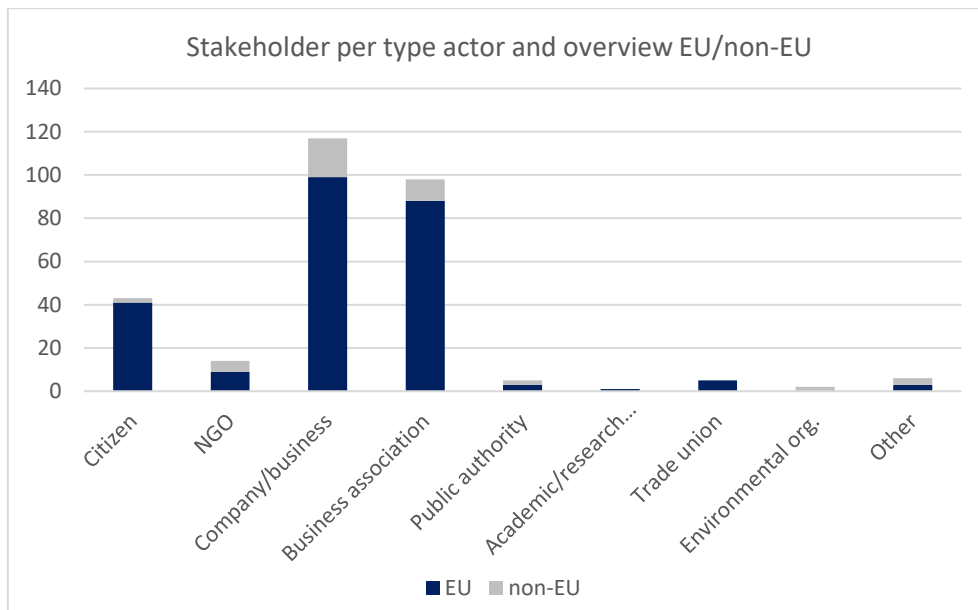


Figure 2: Stakeholder per type actor and overview EU/non-EU

As demonstrated in Figure 3, Germany, Italy, Belgium and France were the countries that provided the most feedback. As the largest EU economies, Germany, Italy and France are likely to be heavily impacted by the EUDR, resulting in more stakeholders responding to the consultation. Germany and Italy provided the most responses, with 60 each, followed by France with 19. Belgium is also highly represented, with 45 statements, which can be explained by the large number of business associations that have their main office in Belgium. These business associations provided 32 out of 45 Belgian responses. With regard to the non-EU countries, stakeholders from 10 different countries participated in the public consultation. The UK, Brazil and Japan provided the most responses, but the overall number remains relatively low compared to the EU participants. The majority of the ten countries that provided responses are classified as low-risk countries. Only Brazil and Malaysia fall into the standard risk category. Consequently, sourcing from Brazil and Malaysia is not subject to a simplified due diligence exercise.

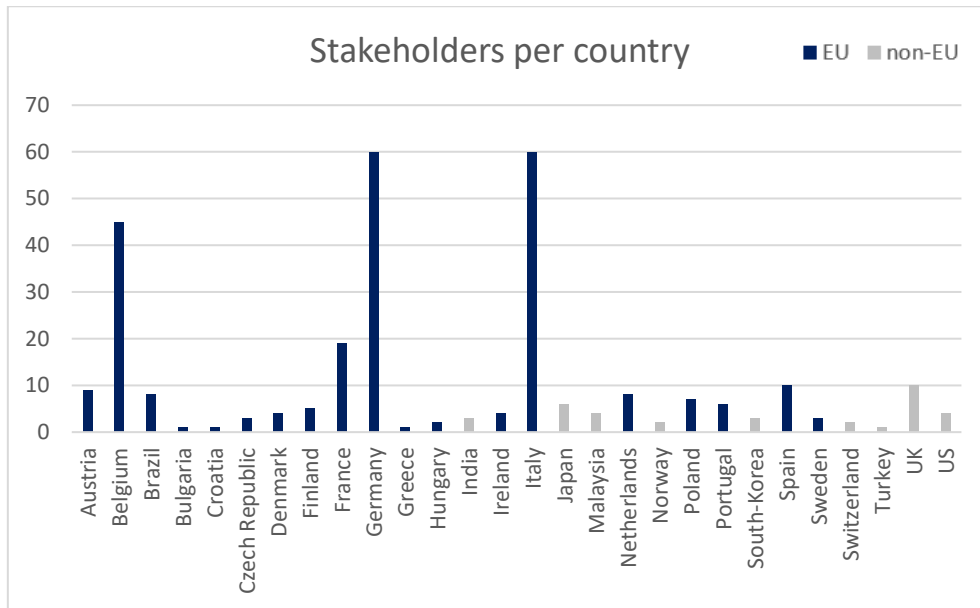


Figure 3: Stakeholders per country

General attitudes towards the EUDR

As illustrated in Figure 4, the sentiment analysis demonstrates an overall negative sentiment among stakeholders towards the EUDR. While a number of stakeholders have expressed their support for the objective of reducing deforestation, the general sentiment towards the regulation is clearly negative. 69% of the stakeholders have adopted a rather negative or negative attitude towards the regulation. 18% of the respondents to the public consultation are considered neutral. Only 13% expressed a favourable opinion of the regulation.

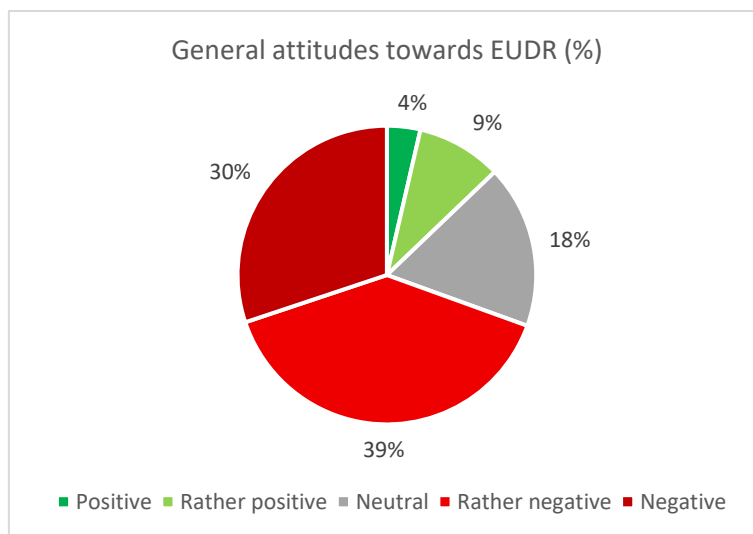


Figure 4: General attitudes towards EUDR (%)

The ratio of EU and non-EU actors per attitude category is illustrated in figure 5. There can be no clear distinction made between EU and non-EU actors in terms of the overall positive or negative sentiments towards the EUDR. However, non-EU actors expressed more pronounced opinions and are comparatively better represented in both the "positive" and "negative" categories. While EU actors are comparatively better represented in the "rather positive", "neutral" and "rather negative" categories.

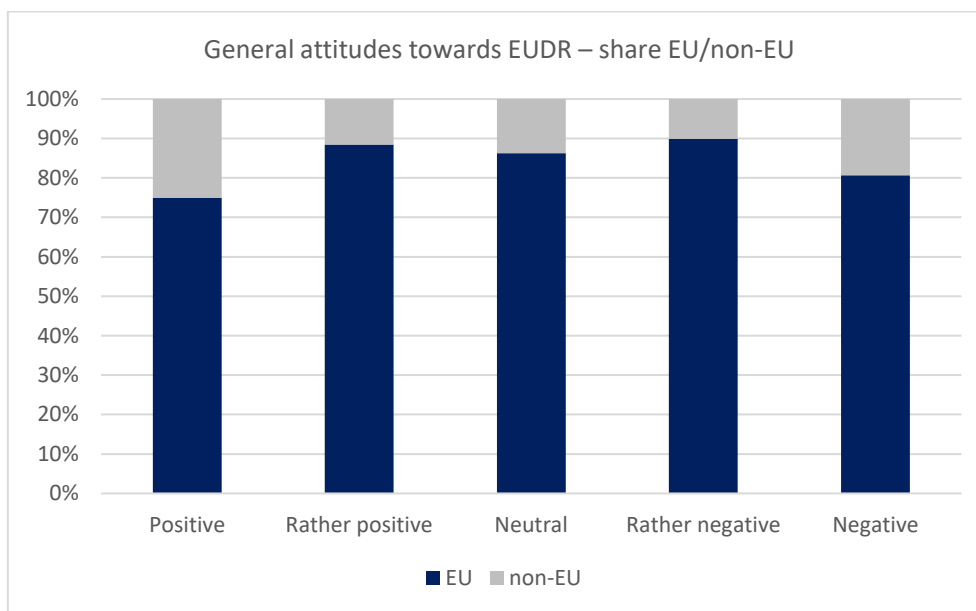


Figure 5: General attitudes towards EUDR – share EU/non-EU

Figure 6 provides an overview of the different attitude categories for each stakeholder group. Of the four largest stakeholder groups – citizens, NGOs, companies and business associations – citizens are overall the most negative towards the EUDR. More than 80% of citizens have expressed a negative or rather negative view of the regulation. Companies and business associations, both representing the industry that is largely impacted by the EUDR, also express a clear negative sentiment. Approximately 70% of the industry representatives falls into the “rather negative” or “negative” category. In contrast, the majority of NGOs, which represent environmental or social interests, have a more positive view of the EUDR. 50% of NGO respondents were considered to have a positive or rather positive attitude, 21% a neutral attitude, and 29% a rather negative or negative attitude. The remaining stakeholder groups, representing only a minority of the respondents, are clearly negatively positioned towards the regulation, with the exception of environmental organisations.

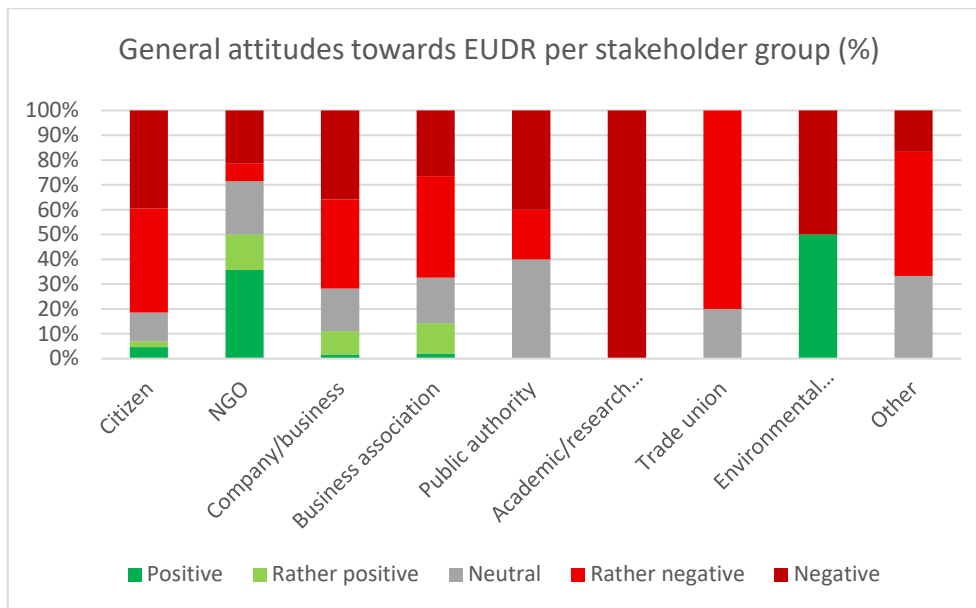


Figure 6: General attitudes towards EUDR per stakeholder group (%)

Stakeholders concerns and opinions

During the content analysis, 12 different opinion categories were identified within the 291 responses to the public consultation. The objective of this analysis was to gain more insight into the reasons behind the general positioning of stakeholders. As demonstrated in Figure 7, the three most significant opinion categories, expressed by both EU and non-EU stakeholders, that could be identified were: “comments on amendment scope”, “lack of guidance and insufficient transition period” and “bureaucracy and demand for simplification”. Furthermore, other relevant concerns, although to a lesser degree, are: “competitive disadvantage”, “concerns about potential leakage effects” and “disproportionate implications for smallholders and SMEs”. For non-EU actors, these three concerns are considered to be of a similar importance. However, for EU actors, the “competitive disadvantage” opinion is mentioned twice as often as the concern about leakage effects and the impact on SMEs. The remaining categories - “competitive advantage”, “weak law enforcement and penalties”, “EU taking responsibility and leading the way in halting deforestation”, “Unilateral decision making & insufficient stakeholder dialogue” and “the legitimacy of the EUDR being questioned” - are less important to the stakeholders and were only identified a couple of times. The assertion that the EUDR would provide a “competitive advantage” has not been made. Furthermore, a significant number of opinions were identified that did not align with any of the previously mentioned categories. These have been placed in the “others” category.

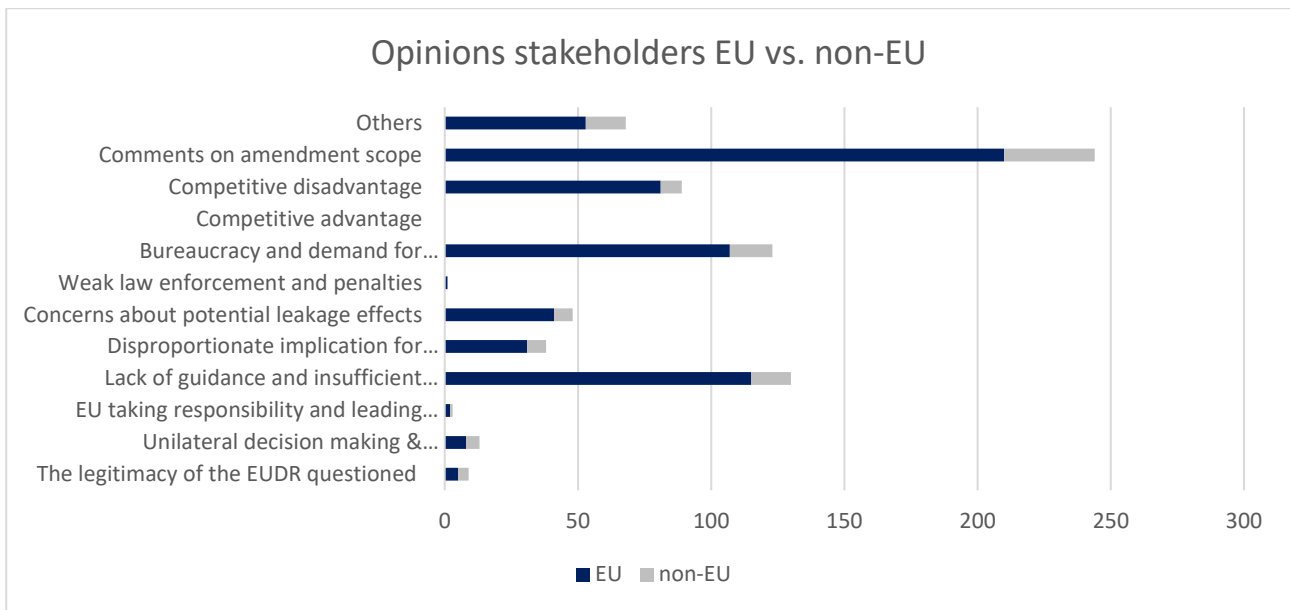


Figure 7: Opinions stakeholders EU vs. non-EU

Annex II provides a detailed overview of the identified opinion categories per stakeholder group. The key concerns raised by the industry, which represents the vast majority of stakeholders, mainly relate to the amendment of the scope, the absence of adequate guidance and limited preparation time, the increased administrative burden combined with a request for further simplification, and the understanding that the EUDR would result in a competitive disadvantage. Furthermore, citizens also played an active role in the public consultation, with their opinions aligning closely with those of the industry. However, this stakeholder group also indicated “potential leakage effects” as one of their key concerns. In the subsequent segment, the implications of each opinion categories will be examined in greater detail to provide additional information on the different statements.

Comments on amendment scope

The most prevalent category that has been identified is feedback on the amendment of the scope of the EUDR. The EU initiated the public consultation to gather feedback on the draft delegated act that amended Annex I concerning the products in scope. 244 of 291 respondents completed this request and provided their feedback on the amendment of products in scope. The subject that was mentioned most frequently in the responses from the stakeholders was bovine hides and leather. 79 out of 244 respondents expressed the opinion that bovine hides and leather should be excluded from the scope of the EUDR. The primary argument is that bovine skins are a by-product of the cattle meat industry and their financial importance is negligible compared to meat. Therefore, it is not responsible for deforestation. If the EUDR were to include skins and leather, given their low financial value, there is a risk that they will be disposed of instead of being "recycled" by the leather industry. This would

have a significant environmental impact. It is also stated that, due to the fact that bovine hides are a by-product, downstream actors do not have sufficient leverage over their suppliers to encourage them to provide the necessary information. In contrast, four stakeholders have clearly stated that hides and leather should remain in scope. They claimed that the assertion that leather is merely a by-product is misleading. According to them, the leather industry exerts significant economic influence and is a contributing factor to global deforestation. Three out of four stakeholders who advocated for the retention of leather were representatives from NGOs and environmental organisations.

Lack of guidance and insufficient transition period

Legal ambiguity and insufficient time to become compliant are issues that stakeholders frequently raised. 130 stakeholders have expressed this opinion. The primary reason for this is that, despite the amendments made to Annex I of the regulation, there remains ambiguity regarding the inclusion of specific products. This uncertainty regarding the products in scope, was highlighted in 80 out of the 130 statements. Furthermore, the Frequently Asked Questions (FAQ) document, published by the EU, provides a comprehensive overview of the necessary details on how to comply with the EUDR. However, some stakeholders have commented that the FAQ is not a legally binding document and therefore does not solve the issue of regulatory uncertainty. It was also reported by a number of respondents that there is a discrepancy between the FAQ and the regulatory text. Moreover, despite the fact that the regulation being postponed by a year, concerns regarding insufficient preparation time remain present. A number of key regulatory documents, including the country benchmarking list, have only recently been published. This reinforces the view of stakeholders that there is a lack of time for companies to prepare.

Bureaucracy and demand for simplification

Despite the EU's efforts to simplify the requirements, concerns have been raised by 123 respondents regarding the increased administrative burden, and further simplification is being requested. As literature on the subject indicates, the high bureaucracy level within the EU, which potentially reduces the EU's competitiveness, is not only a concern for the EUDR, but is a general issue within the EU. Of the 123 stakeholders who made this claim, 109 are from within the EU, but the concern has also been raised by stakeholders from outside the EU. Non-EU actors have expressed concerns that they may be required to make additional efforts to demonstrate compliance, in order to satisfy their EU trading partners. Stakeholders have made it clear that further simplification of the EUDR is required. The respondents' key proposal is to introduce a minimum threshold, thereby exempting small quantities from the requirement to provide a due diligence statement. Furthermore, it has been proposed that the primary focus should be on the importer conducting the due diligence exercise, with

the removal of due diligence obligations for downstream parties. Finally, stakeholders proposed the addition of a zero risk category. When sourcing from countries with zero or negligible deforestation risk, no due diligence exercise should be conducted.

Competitive disadvantage

The opinion that the regulation entails a competitive disadvantage has been stated 89 times. In literature, the issue of competitive disadvantage was frequently associated with the country benchmarking list. Suppliers operating in high- and standard-risk countries face greater compliance costs and administrative hurdles than suppliers in low-risk countries. This would therefore result in a competitive disadvantage for suppliers from high- and standard-risk countries. This concern is not reflected in the analysed statements. The primary recurring theme is the perceived disadvantaged position of the EU, despite the fact that all EU countries are considered low-risk. 78 out of 89 respondents expressed concerns that the EUDR would create a competitive disadvantage for EU businesses. This concern is closely connected to the claim that the EUDR results in an additional administrative burden. Stakeholders are concerned that EU companies will face additional compliance costs, potentially leading to higher prices on international markets compared to non-EU competitors. This could potentially result in job losses within the EU. Additionally, for certain supply chains, the intermediate product is in scope of the regulation, but the end product is not. This is the case for the leather supply chain. As bovine hides fall within the scope of the EUDR, importers and processors are obliged to obtain a due diligence statement for all products. In contrast, final leather products, such as leather shoes, are not included in the scope. This means that they can be imported in the EU without any due diligence obligation. This would create a competitive advantage for non-EU companies that sell leather consumption goods over their EU-based competitors that buy and process raw materials. It has also been indicated, although only in a few statements, that SMEs are at a disadvantage in comparison to large companies, a concern also reflected in relevant literature.

Concerns about potential leakage effects

Concerns have been raised by 48 respondents that the regulation will have limited impact on reducing deforestation due to leakage effects. The main focus in relevant literature was on "clean" and "dirty" supply chain. Goods originating from deforested land are likely to enter the "dirty" supply chain and be sold to markets with lower environmental standards. This concern is also reflected in the analysed statement. However, one specific leakage scenario has been put forward by 34 out of 48 statements. This scenario is linked to the fact that certain intermediate products are in scope of the EUDR, while specific final products are not. Stakeholders are concerned that companies that were previously manufacturing in the EU might choose to relocate their production to non-EU countries. Suppliers

can then sell their raw materials to these relocated non-EU production sites without having to perform any additional administrative tasks. Manufacturers are able to sell finalised products that are not subject to the EUDR on the EU market without the obligation to perform due diligence. In this scenario, there will be no reduction of global deforestation and only a negative impact for the EU market, as production will be relocated. EU producers remaining in the EU and importing relevant commodities directly will experience a competitive disadvantage.

Disproportionate implication for smallholders and SMEs

38 respondents expressed concerns about the significant impact on smallholders and SMEs. The statements emphasised that EU SMEs will face high compliance costs and complex regulations for which they often lack the necessary expertise. The emphasis was also placed on non-EU smallholders and SMEs. They are in a vulnerable position and will encounter difficulties in fulfilling the additional data requests from their EU trading partners. For instance, the Brazilian public authority has requested additional support measures for SMEs, as they fear that the EUDR might jeopardize the position of small farms and companies in global supply chains. This concern has also been reflected in literature covering the EUDR and EUTR.

Unilateral decision making & insufficient stakeholder dialogue

The opinion category concerning the unilateral side of the regulation and a lack of dialogue with stakeholders could be identified in 12 statements. Literature on this topic has highlighted the absence of dialogue with non-EU countries and the lack of alignment between the EUDR and national environmental initiatives. This concern was expressed clearly in a statement by a Brazilian and Malaysian actor. Both countries are classified as standard risk countries. The absence of stakeholder involvement at industry level has also been emphasised. The majority of the 12 statements have been issued by companies or business associations. These statements expressed criticism on the lack of industry consultation and requested that the EU would incorporate industry-specific aspects into the regulation.

The legitimacy of the EUDR questioned

The question of the EU's authority in imposing this regulation, as discussed in literature, is also included in nine responses to the public consultation. The most prominent opinions on this matter were expressed by two Brazilian actors, one of whom was representing the Brazilian government. Both actors have criticised the discriminatory and punitive nature of the EUDR, and suggested that it may be inconsistent with global trade rules. The remaining respondents, all from the industry, have

raised questions regarding the alignment of the EUDR with WTO principles, and whether it constitutes an unauthorised non-tariff trade barrier.

Weak law enforcement and penalties

With regard to the EUTR regulation, a key concern was that the EU lacked the capacity to enforce the regulation. This would result in a reduced regulatory impact. During the EUDR-related public consultation, only one respondent offered made this comment. Therefore, it can be concluded that insufficient law enforcement is not a concern for the stakeholders who engaged in the public consultation.

EU taking responsibility & competitive advantage

The two opinion categories that have expressed favourable statements regarding the EUDR, have been rarely identified during the content analysis. None of the respondents claimed that the regulation was providing them with a competitive advantage. The literature study indicated that companies operating in low-risk countries would view the EUDR as beneficial for their market position. This cannot be confirmed based on the analysis of the statements. In fact, the opposite could be observed, with a significant number of stakeholders stating that the industry in EU countries would be disadvantaged, despite all EU countries being classified as "low risk". The positive opinion category, which regards the EUDR as the EU taking responsibility and having a positive impact on global deforestation, was identified within three statements. Of these, two respondents were from NGOs.

Others

In order to capture a broad range of opinions, the "others" category was introduced to complement concerns raised in literature. An analysis of the 68 statements falling in this category revealed three recurring topics. Nine stakeholders have expressed concerns that the EUDR-relevant products may be replaced by synthetic alternatives, which are likely to have their own environmental impact. The possible misalignment between EU Member States in how they enforced the regulation, and therefore adding complexity, has been mentioned eight times. The other respondent mainly stated a general concern that the EUDR would lead to disruption of the global market, and that this would result in adverse social and economic effects all over the world.

Conclusion

This dissertation has made a contribution to the understanding of who the main EUDR stakeholders are, their general attitude towards the regulation, and the concerns and opinions that underpin this attitude. Companies and business associations, from both the EU and non-EU countries, are the primary stakeholders of this policy. Furthermore, citizens and NGOs can also be considered important interest groups. Stakeholders have frequently emphasised the significance of curbing global deforestation. However, whether they consider the EUDR, in its current form, to be the most suitable instrument to achieve this, can be questioned. The sentiment analysis revealed an overall negative attitude among stakeholders towards the EUDR. This critical stance towards the regulation can be detected both within and outside the EU. For NGOs operating within the fields of environmental and social rights, a more positive attitude could be detected. In order to mitigate the prevailing negative sentiment towards the regulation, it is crucial to address the concerns should that were raised by stakeholders. For instance, greater clarity on which products are within the scope of the regulation is necessary. Furthermore, it is essential to minimise the discrepancy in compliance effort between certain intermediate and finished products. This would prevent a production shift to non-EU countries and ensure equal competition between EU and non-EU actors. Providing regulatory clarity, and guaranteeing that companies have enough guidance and time to become compliant should be a priority for the EU. Additionally, particular consideration should be given to SMEs, both within and outside the EU, to ensure they are not overwhelmed by EUDR requirements and excluded from global supply chains. The stakeholder demand to reduce bureaucracy is clearly stated. The industry has requested a further reduction in the complexity of regulations, for example by introducing a zero-risk category for countries. This proposal should be given further consideration. However, additional simplification should not compromise the regulation's effectiveness in addressing global deforestation. While the introduction of a zero-risk category and other simplification initiatives could reduce bureaucracy, they could also increase concerns such as regulatory uncertainty, perceived unfair competition, and unauthorised trade barriers. Finally, although efforts have been made to guarantee stakeholder involvement in the design of the EUDR policy, it would be beneficial for the EU to create more opportunities to engage with key EU and non-EU stakeholders, given the significant negative sentiment towards the regulation. Understanding stakeholders' concerns and tackling them is essential for improving policy design and ensuring a smooth implementation of the EUDR. This is crucial to ensuring that the EUDR achieves its policy objectives and reduces the impact of EU consumption on global deforestation.

Only stakeholders who actively participated in the public consultation were considered for this dissertation. Using a top-down approach to map stakeholders could lead to the underrepresentation of stakeholders who lack the necessary information or resources to engage in the policymaking process. Future research could focus on identifying the gaps in the stakeholder mapping and including the position and concerns of potentially underrepresented stakeholder groups. In addition, the public consultation provided valuable input that contributed to answering the research questions. However, the initial purpose of the consultation was to gather stakeholder perspectives on the amendment of Annex I. Organising a public consultation that directly questions the overall positions towards the EUDR and the underlying concerns, or organising in-depth interviews with relevant stakeholders, could enrich the understanding of stakeholder opinions.

Bibliography

Almeida, D. V., Kolinjivadi, V., Ferrando, T., Roy, B., Herrera, H., Gonçalves, M. V., & Van Hecken, G. (2023). The “greening” of empire: The European Green Deal as the EU first agenda. *Political Geography*, 105. <https://doi.org/10.1016/j.polgeo.2023.102925>

Austrian Society for Environment and Technology. (2007). *The public participation manual*. Retrieved from https://www.arbter.at/pdf/public_part_manual.pdf

Berkhout, J., Beyers, J. Braun, C., Hanegraaff, M., & Lowery, D. (2017). Making inference across mobilisation and influence research: Comparing Top-Down and Bottom-Up mapping of interest systems. *Political Studies*, 66(1), 43-62.

Borchardt, S., Trane, M., Cisternino, S., & Marelli, L. (2025). Perceptions of the European Green Deal: Understanding public sentiment. *Social Media + Society*, 11(3). <https://doi.org/10.1177/20563051251337404>

Bunea, A., Wüest, R., & Lipcean, S. (2025). Mapping the policy space of public consultations: Evidence from the European Union. *Journal of European Public Policy*, 32(3), 755-783. <https://doi.org/10.1080/13501763.2024.2320836>

Business & Human Rights Resource Centre. (2024). *More than 50 companies call out in support of European Green Deal & against deregulation*. Retrieved from <https://www.business-humanrights.org/en/latest-news/eu-more-than-50-companies-call-for-continuation-of-european-green-deal-against-deregulation/>

Carlson, K. M., Heilmayr, R., Gibbs, H. K., Noojipady, P., Burns, D. N., Morton, D. C., ..., Kremen, C. (2018). Effect of oil palm sustainability certification on deforestation and fire in Indonesia. *PNAS USA*, 115(1), 121-126.

- Cesar De Oliveira, S. E., Nakagawa, L., Lopes, G. R., Visentin, J. C., Couto, M., Silva, D. E., ..., West, C. (2024). The European Union and United Kingdom's deforestation-free supply chains regulations: Implications for Brazil. *Ecological Economics*, 217(5).
<https://doi.org/10.1016/j.ecolecon.2023.108053>
- CIRCABC. (2023). *Stakeholder Members of Platform on Deforestation*. Retrieved from
<https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/3f38fee2-6e0f-44de-be7f-3d04003cc01c/details?download=true>
- Clark, T., Foster, L., Bryman, A., & Sloan, L. (2021). *Bryman's Social Research Methods*. Oxford University Press.
- Dechezleprêtre, A. & Sato, M.. (2017). The Impacts of Environmental Regulations on Competitiveness. *Environmental Economics and Policy*, 11(2), 183-206.
- Dorn, F. M. (2022). Green colonialism in Latin America? Towards a new research agenda for the global energy transition. *European Review of Latin American and Caribbean Studies*, 0(114), 137-146.
- Durán, G. M., & Scott, J. (2022). Regulating trade in forest-risk commodities: Two cheers for the European Union. *Journal Of Environmental Law*, 34, 245–267. <https://doi.org/10.1093/jel/eqac002>
- EU Draft Delegated Act Amending Regulation 2023/1115. (2025). Retrieved from
https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14655-Delegated-Regulation-amending-Annex-I-of-Regulation-EU-2023-1115-EU-Deforestation-Regulation_en
- European Deforestation Regulation 2023/1115. (2023). Retrieved from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115&qid=1687867231461>
- European Commission. (2025c). *Omnibus IV*. Retrieved from https://single-market-economy.ec.europa.eu/publications/omnibus-iv_en
- European Commission. (2018). *Sustainable Development Goals: first meeting of the Commission's high level multi-stakeholder platform*. Retrieved from
https://ec.europa.eu/commission/presscorner/detail/en/ip_18_82
- European Commission. (2020). *Public consultation deforestation and forest degradation*. Retrieved from
https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12137-Minimising-the-risk-of-deforestation-and-forest-degradation-associated-with-products-placed-on-the-EU-market/public-consultation_en
- European Commission. (2025a). *Feedback period EU rules to minimise deforestation & forest degradation*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14655-EU-rules-to-minimise-deforestation-forest-degradation-amendment-of-Annex-I-to-the-Deforestation-Regulation_en

- European Commission. (2025b). *Commission expert group/multi-stakeholder platform on protecting and restoring the world's forests*. Retrieved from <https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupId=3282&fromMeetings=true&meetingId=23741>
- European Commission. (2025c). *Annex to the commission implementation regulation laying down rules for the application of the Deforestation Regulation*. Retrieved from https://environment.ec.europa.eu/publications/commission-implementing-regulation-laying-down-rules-application-deforestation-regulation_en
- European Commission. (2025d). *Amendment of annex I to the deforestation regulation*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14655-EU-rules-to-minimise-deforestation-forest-degradation-amendment-of-Annex-I-to-the-Deforestation-Regulation_en
- European Commission. (n.d.(a)). *Regulation on deforestation-free products*. Retrieved from https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en
- European Commission. (n.d.(b)). *The European Green Deal*. Retrieved from https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en
- European Commission. (n.d.(c)). *Deforestation*. Retrieved from https://environment.ec.europa.eu/topics/forests/deforestation_en
- European Commission. (n.d.(d)). *EU rules against illegal logging*. Retrieved from https://environment.ec.europa.eu/topics/forests/deforestation/eu-rules-against-illegal-logging_en
- European Commission. (n.d.(e)). *The information system of the Deforestation Regulation*. Retrieved from https://green-forum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation/information-system-deforestation-regulation_en
- European Commission. (n.d.(f)). *EUDR benchmarking, cooperation and partnerships*. Retrieved from https://green-forum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation/eudr-cooperation-and-partnerships_en
- European Commission. (n.d.(g)). *Country classification list*. Retrieved from https://green-forum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation/eudr-cooperation-and-partnerships/country-classification-list_en
- European Commission. (n.d.(h)). *Stakeholder analysis*. Retrieved from <https://wikis.ec.europa.eu/spaces/ExactExternalWiki/pages/170888241/Stakeholder+Analysis>

- European Commission. (n.d.(i)). *Engagement of civil society, private sector and other stakeholders*. Retrieved from https://commission.europa.eu/strategy-and-policy/sustainable-development-goals/engagement-civil-society-private-sector-and-other-stakeholders_en
- European Commission. (n.d.(j)). *Obligations for SMEs operating under EUDR*. Retrieved from https://greenforum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation/factsheet-smes_en
- European Council. (2024). *EU deforestation law: Council formally adopts its one-year postponement*. Retrieved from <https://www.consilium.europa.eu/en/press/press-releases/2024/12/18/eu-deforestation-law-council-formally-adopts-its-one-year-postponement/>
- European Parliament. (2023). *Towards deforestation-free commodities and products in the EU*. Retrieved from [https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/698925/EPRS_BRI\(2022\)698925_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/698925/EPRS_BRI(2022)698925_EN.pdf)
- European Parliament. (2025). *Deforestation: causes and how the EU is tackling it*. Retrieved from <https://www.europarl.europa.eu/topics/en/article/20221019STO44561/deforestation-causes-and-how-the-eu-is-tackling-it>
- Ezeofor, K. V. (2025). *The role of the European Union Deforestation Regulation (EUDR) in mitigating climate change*. https://doi.org/10.31235/osf.io/qasvk_v1
- Fiala, V., Jacob, K., Barnickel, C., & Feindt, P. H. (2024). Diverging Stories on food system transitions. A qualitative analysis of policy narratives in the public consultation on the European Commission's Farm to Fork Strategy. *Journal of Rural Studies*, 110. <https://doi.org/10.1016/j.jrurstud.2024.103374>
- Fisher, M. R., Obidzinski, K., Alves, A. M., & Ekaputri, A. D. (2024). Commodities and global climate governance: Early evidence from the EU Deforestation-free Regulation (EUDR). *Eas-West Center*, 27(165).
- Food and Agricultural Organisation. (2020). *FAO Remote Sensing Survey reveals*. Retrieved from <https://openknowledge.fao.org/server/api/core/bitstreams/fe22a597-a39d-4765-8393-95fbcaed6416/content>
- Food and Agricultural Organisation. (2022). *Halting deforestation from agricultural value chains: the role of governments*. Retrieved from <https://openknowledge.fao.org/server/api/core/bitstreams/cdde1142-a609-4457-b6a8-b1018b97e32e/content>
- Fujiwara, N., Karakosta, C., Szpor, A., Tuerk, A., & Hofman, E. (2015). *How do stakeholders view the EU ETS? Diversity and differentiation of interests*. Retrieved from <https://cdn.ceps.eu/wp-content/uploads/2015/05/POLIMP%20WD%20No%20%20Stakeholder%20Views%20on%20ETS%20Reform.pdf>

- Garrett, R. D., Levy, S., Gollnow, F., Hodel, L., & Rueda, X. (2021). Have food supply chain policies improved forest conservation and rural livelihoods? A systematic review. *Environmental Research Letters*, 16(3). <https://doi.org/10.1088/1748-9326/abe0ed>
- Giurca, A., & Jonsson, R. (2015). The opinions of some stakeholders on the European Union Timber Regulation (EUTR): an analysis of secondary sources. *iForest*, 8, 681-686. <https://doi.org/10.3832/ifor1271-008>
- Grabs, J., & Carodenuto, S. (2021). Traders as sustainability governance actors in global food supply chains: A research agenda. *Business Strategy and the Environment*, 30(2), 1314-1332. <https://doi.org/10.1002/bse.2686>
- Green European Journal. (2024). *EU Deforestation Regulation: balancing climate action and global trade challenges*. Retrieved from <https://www.greeneuropeanjournal.eu/eu-deforestation-regulation-balancing-climate-action-and-global-trade-challenges/#:~:text=A%20unilateral%20decision,their%20participation%20in%20global%20markets>.
- Grishchenko, L. (2025). *Navigating the European Union Regulation on Deforestation-free products: Challenges for operators and traders*. Retrieved from <https://lup.lub.lu.se/student-papers/search/publication/9210033>
- Hanssen, R. S. (2022). *Diversity in stakeholder preferences regarding EU Policy: The effect of survey elements within processes of open public consultation*. Retrieved from <https://bora.uib.no/bora-xmlui/handle/11250/3013211>
- Jordan, A. (2007). The governance of sustainable development: taking stock and looking forwards. *Environmental and Planning C: Government and Policy*, 26, 17-33. <https://doi.org/10.1068/cav6>
- Köthke, M., Lippe, M., & Elsasser, P. (2023). Comparing the former EUTR and upcoming EUDR: Some implications for private sector and authorities. *Forest Policy and Economics*, 157. <https://doi.org/10.1016/j.forpol.2023.103079>
- Krugmann, J.O., Hartmann, J. (2024). Sentiment Analysis in the Age of Generative AI. *Customers Needs and Solutions*. 11(3). <https://doi.org/10.1007/s40547-024-00143-4>
- Liu, B. (2012). *Sentiment Analysis and Opinions Mining*. Springer. <https://doi.org/10.1007/978-3-031-02145-9>
- McDermott, C. L., Montana, J., Bennett, A., Gueiros, C., Hamilton, R., Hirons, M., ..., Picot, L. (2022). Transforming land use governance: Global targets without equity miss the mark. *Environmental Policy and Governance*, 33(3), 245-257. <https://doi.org/10.1002/eet.2027>

- Middlemiss, L. (2014). Individualised or participatory? Exploring late-modern identity and sustainable development. *Environmental Politics*, 23(6), 929-946.
<http://dx.doi.org/10.1080/09644016.2014.943010>
- Muradian, R., Cahyafitri, R., Ferrando, T., Grottera, C., Jardim-Wanderley, L., Krause, T., ..., Verla-Almeida, D. (2025). Will the EU deforestation-free products regulation (EUDR) reduce tropical forest loss? Insights from three producer countries. *Ecological Economics*, 227.
<https://doi.org/10.1016/j.ecolecon.2024.108389>
- Pisano, U., Lange, L. K., Lepuschitz, K., & Berger, G. (2015). *The role of stakeholder participation in European sustainable development policies and strategies*. Retrieved from
https://www.researchgate.net/publication/312496614_Pisano_U_LK_Lange_K_Lepuschitz_and_G_Berger_2015_The_role_of_stakeholder_participation_in_European_sustainable_development_policies_and_strategies
- Politico. (2024). *Weber crows as von der Leyen walks back EU deforestation drive*. Retrieved from
<https://www.politico.eu/article/manfred-weber-ursula-von-der-leyen-europe-deforestation-law-walkback/>
- Preferred by Nature. (2025). *European Commission publishes first list of country benchmarks*. Retrieved from <https://www.preferredbynature.org/news/european-commission-publishes-first-list-country-benchmarks-under-eu-deforestation-regulation>
- UN AGENDA 21. (1992). Retrieved from
<https://sustainabledevelopment.un.org/content/documents/Agenda21.pdf>
- UN Development Programme. (2017). *Stakeholder engagement*. Retrieved from https://ses-toolkit.info.undp.org/sites/g/files/zskgke446/files/SES%20Document%20Library/Social%20and%20Environmental%20Standards/UNDP%20SES%20Stakeholder%20Engagement%20GN_Oct2017.pdf
- UN Economic and Social Commission for Asia the Pacific. (2018). *Effective stakeholder engagement for the 2030 agenda*. Retrieved from
<https://www.unescap.org/sites/default/files/Final.Effective%20Stakeholder%20Engagement%20for%20the%202030%20Agenda%20rev.pdf>
- UN Environmental Programme. (2024). *How halting deforestation can help counter the climate crisis*. Retrieved from <https://www.unep.org/news-and-stories/story/how-halting-deforestation-can-help-counter-climate-crisis>
- UN Environmental Programme. (n.d.). *Stakeholder engagement factsheet*. Retrieved from
<https://wedocs.unep.org/bitstream/handle/20.500.11822/37841/SEF.pdf?sequence=3&isAllowed=y>
- UN Future We Want Outcome Document. (2012). Retrieved from
<https://sustainabledevelopment.un.org/futurewewant.html>

- World Resource Forum. (2020). *Stakeholder engagement strategy*. Retrieved from <https://resourcing.eu/content/uploads/2022/11/d6.1-stakeholder-management-strategy.pdf>
- WWF. (n.d.). *Explore the deforestation fronts*. Retrieved from https://wwf.panda.org/discover/our_focus/forests_practice/deforestation_fronts_fact_sheets/
- WWF UK. (n.d.). *The effects of deforestation*. Retrieved from <https://www.wwf.org.uk/learn/effects-of/deforestation>
- Ylönen, M., & Erkkilä, T. (2025). What sustains flawed indicators? Unpacking the EU's administrative burden agenda. *Policy Studies*, 1-31. <https://doi.org/10.1080/01442872.2025.2519297>
- Zhunosova, E., Ahimbisibwe, V., Hoa Sen, L. T., Sadeghi, A., Toledo-Aceves, T., Kabwe, G., & Günter, S. (2022). Potential impacts of the proposed EU regulation on deforestation-free supply chains on smallholders, indigenous peoples, and local communities in producer countries outside the EU. *Forest Policy and Economics*, 143. <https://doi.org/10.1016/j.forpol.2022.102817>

ANNEX I

Stakeholder mapping

Table 1: General overview stakeholder

| TYPE ACTOR | EU | NON-EU | TOTAL (amount) | TOTAL (%) |
|-------------------------------|------------|-----------|----------------|-------------|
| Citizen | 41 | 2 | 43 | 15% |
| NGO | 9 | 5 | 14 | 5% |
| Company/business | 99 | 18 | 117 | 40% |
| Business association | 88 | 10 | 98 | 34% |
| Public authority | 3 | 2 | 5 | 2% |
| Academic/research institution | 1 | 0 | 1 | 0% |
| Trade union | 5 | 0 | 5 | 2% |
| Environmental organisation | 0 | 2 | 2 | 1% |
| Other | 3 | 3 | 6 | 2% |
| TOTAL | 249 | 42 | 291 | 100% |

Table 2: Overview stakeholders per country

| STAKEHOLDERS PER COUNTRY | | | | | |
|--------------------------|----|-------------|----|-------------|----|
| Austria | 9 | Germany | 60 | Norway | 2 |
| Belgium | 45 | Greece | 1 | Poland | 7 |
| Brazil | 8 | Hungary | 2 | Portugal | 6 |
| Bulgaria | 1 | India | 3 | South-Korea | 3 |
| Croatia | 1 | Ireland | 4 | Spain | 10 |
| Czech republic | 3 | Italy | 60 | Sweden | 3 |
| Denmark | 4 | Japan | 6 | Switzerland | 2 |
| Finland | 5 | Malaysia | 4 | Turkey | 1 |
| France | 19 | Netherlands | 8 | UK | 10 |

Analysis general attitudes

Table 3: Overview general attitudes towards EUDR

| ATTITUDES | EU | NON-EU | TOTAL |
|-----------------|------------|-----------|------------|
| Positive | 9 | 3 | 12 |
| Rather positive | 23 | 3 | 26 |
| Neutral | 44 | 7 | 51 |
| Rather negative | 98 | 11 | 109 |
| Negative | 75 | 18 | 93 |
| TOTAL | 249 | 42 | 291 |

Table 4: Overview general attitudes towards EUDR per stakeholder group

| TYPE ACTOR | Positive | Rather | | Rather | | TOTAL |
|-------------------------------|-----------|-----------|-----------|------------|-----------|------------|
| | | Positive | Neutral | Negative | Negative | |
| Citizen | 2 | 1 | 5 | 18 | 17 | 43 |
| NGO | 5 | 2 | 3 | 1 | 3 | 14 |
| Company/business | 2 | 11 | 20 | 42 | 42 | 117 |
| Business association | 2 | 12 | 18 | 40 | 26 | 98 |
| Public authority | 0 | 0 | 2 | 1 | 2 | 5 |
| Academic/research institution | 0 | 0 | 0 | 0 | 1 | 1 |
| Trade union | 0 | 0 | 1 | 4 | 0 | 5 |
| Environmental organisation | 1 | 0 | 0 | 0 | 1 | 2 |
| Other | 0 | 0 | 2 | 3 | 1 | 6 |
| TOTAL | 12 | 26 | 51 | 109 | 93 | 291 |

Analysis stakeholder opinions

Table 5: Overview per opinion category

| OPINIONS | EU | non-EU | TOTAL |
|---|-----|--------|------------|
| The legitimacy of the EUDR questioned | 5 | 4 | 10 |
| Unilateral decision making & insufficient stakeholder dialogue | 8 | 5 | 12 |
| EU taking responsibility and leading the way in halting deforestation | 2 | 1 | 3 |
| Lack of guidance and insufficient transition period | 115 | 15 | 130 |
| Disproportionate implication for smallholders and SMEs | 31 | 7 | 38 |
| Concerns about potential leakage effects | 41 | 7 | 48 |
| Weak law enforcement and penalties | 1 | 0 | 1 |
| Bureaucracy and demand for simplification | 107 | 16 | 123 |
| Competitive advantage | 0 | 0 | 0 |
| Competitive disadvantage | 81 | 8 | 89 |
| Comments on amendment scope | 210 | 34 | 244 |
| Others | 53 | 15 | 68 |

Table 6: Overview stakeholder groups per opinion category

| OPINIONS | Citizen | NGO | Company/business | Business association | Public authority | Academic institution | Trade union | Environmental org. | Other | TOT |
|---|----------------|------------|-------------------------|-----------------------------|-------------------------|-----------------------------|--------------------|---------------------------|--------------|------------|
| The legitimacy of the EUDR questioned | 0 | 1 | 7 | 0 | 1 | 0 | 0 | 0 | 0 | 9 |
| Unilateral decision making & insufficient stakeholder dialogue | 0 | 0 | 4 | 7 | 1 | 0 | 0 | 0 | 1 | 13 |
| Eu taking responsibility and leading the way in halting deforestation | 0 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Lack of guidance and insufficient transition period | 10 | 6 | 44 | 60 | 2 | 0 | 4 | 1 | 3 | 130 |
| Disproportionate implication for smallholders and SMEs | 2 | 3 | 10 | 19 | 1 | 0 | 1 | 0 | 2 | 38 |
| Concerns about potential leakage effects | 13 | 4 | 21 | 8 | 1 | 1 | 0 | 0 | 0 | 48 |
| Weak law enforcement and penalties | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Bureaucracy and demand for simplification | 8 | 3 | 43 | 63 | 2 | 0 | 2 | 0 | 2 | 123 |
| Competitive advantage | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Competitive disadvantage | 20 | 3 | 44 | 17 | 1 | 1 | 1 | 0 | 2 | 89 |
| Comments on amendment scope | 34 | 11 | 98 | 87 | 2 | 1 | 4 | 2 | 5 | 244 |
| Others | 5 | 3 | 34 | 23 | 2 | 0 | 0 | 0 | 1 | 68 |

ANNEX II

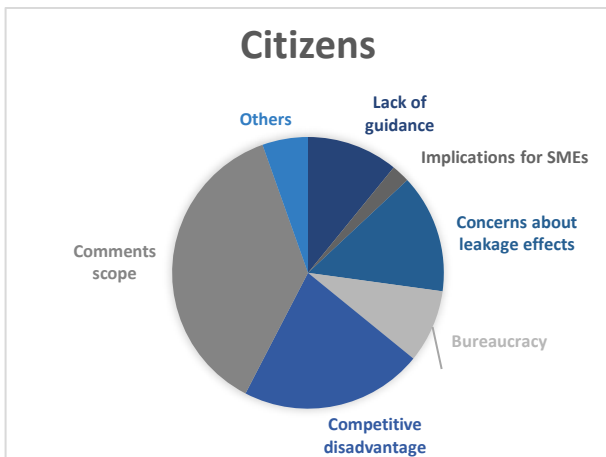


Figure 8: Opinions and concerns citizens

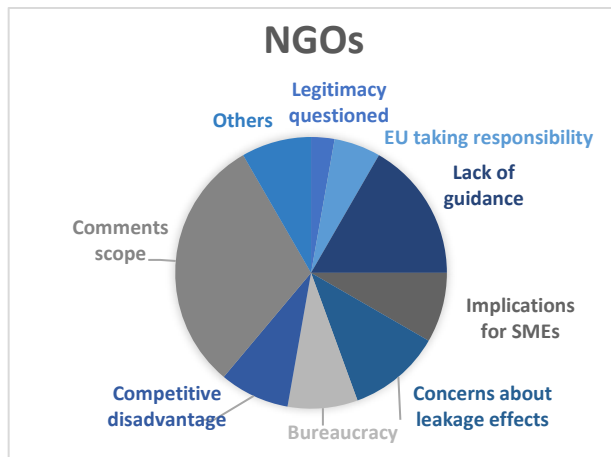


Figure 9: Opinions and concerns NGOs

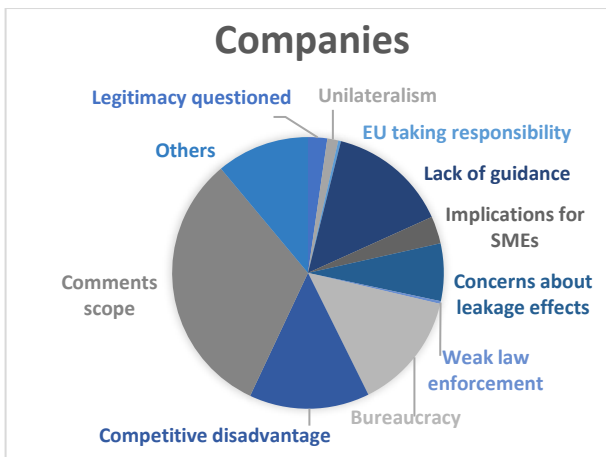


Figure 10: Opinions and concerns Companies

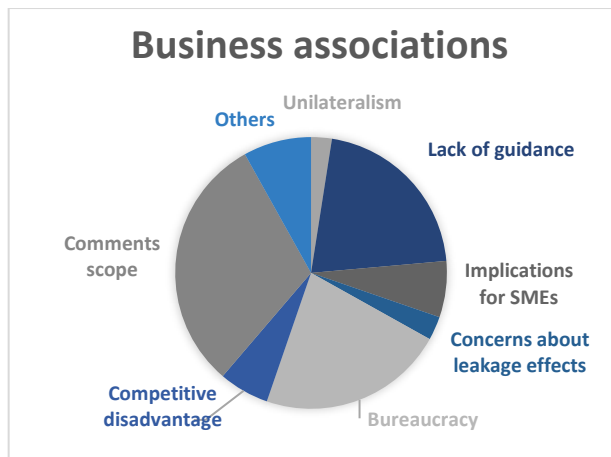


Figure 11: Opinions and concerns Business associations

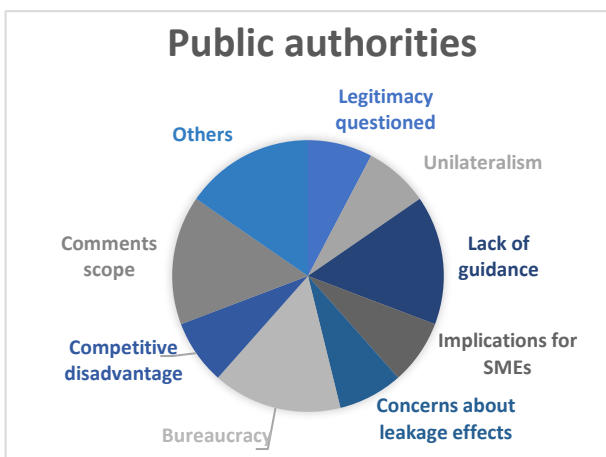


Figure 12: Opinions and concerns public authorities



Figure 13: Opinions and concerns Academic/research institutions

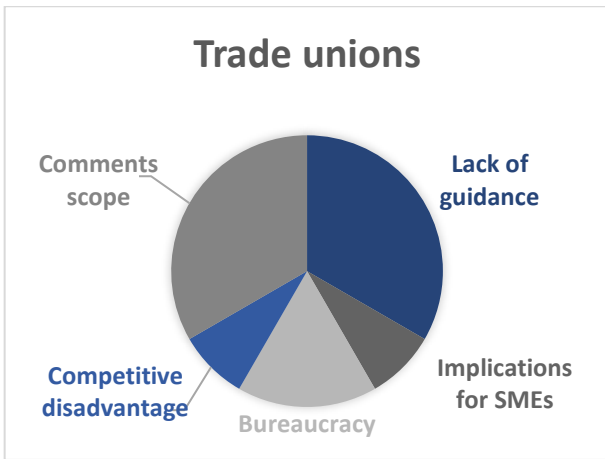


Figure 14: Opinions and concerns trade unions



Figure 15: Opinions and concerns environmental organisations

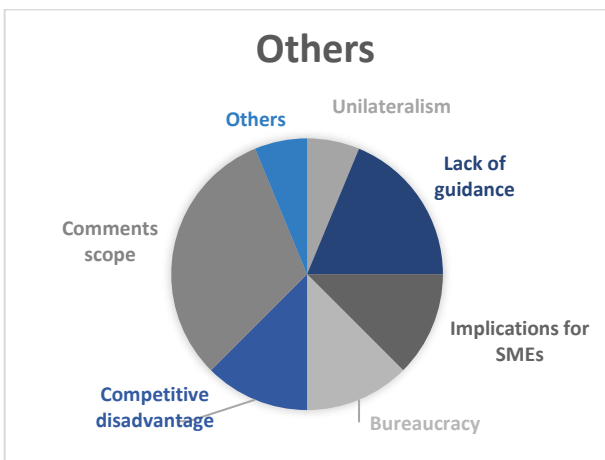


Figure 16: Opinions and concerns others

ANNEX III

Prompt for sentiment analysis in LLMs:

Conduct a sentiment analysis on the following statement to determine the position towards the EUDR and classify the sentiment of the following text as “positive”, “rather positive”, “neutral”, “rather negative”, “negative”. Take in into account the following aspects: “opening tone”, “support for EUDR goals”, “number of recommendations”, “operational concerns”, and “tone and framing”. Take into account that when multiple recommendations are provided it is considered as being more negatively towards the EUDR. Statement: [Insert text here]