

United States Senate
WASHINGTON, DC 20510

March 8, 2024

The Honorable Katherine Tai
United States Trade Representative
500 17th Street NW
Washington, DC 20508

Dear Ambassador Tai:

We write to express our concern about the potential effects of the European Union Deforestation-free Regulation (EUDR) on U.S. paper and pulp producers, which becomes enforceable in 2025. We are concerned that the rule will negatively impact U.S. producers by imposing costly requirements on U.S. exporters that will limit market access for the \$3.5 billion in U.S. forest-derived products entering the European Union (EU) annually. We appreciate the United States Trade Representative's (USTR) attention and engagement on EUDR and urge USTR to continue to engage with the European Commission (EC), EU member states, and the World Trade Organization (WTO) to ensure that U.S. paper and pulp producers are treated fairly under these EU regulations.

The U.S. paper and pulp industry is the global leader in sustainably managing forests and produces essential items such as baby diapers, toilet paper, boxes, packaging, and printing-writing paper. The industry collectively manufactures \$350 billion worth of products, directly employs more than 920,000 Americans, and indirectly supports more than two million jobs. Protecting the long-term health and stability of U.S. forests through sustainable practices has long been a cornerstone of the industry.

While we applaud the EU's commitment towards reducing deforestation, the EUDR, as currently written, presents significant compliance issues due to its stringency and ambiguity. One specific concern is the traceability requirement. The EUDR imposes a geolocation traceability requirement that mandates sourcing to the individual plot of land for every shipment of timber product to the EU. In the U.S., 42 percent of the wood fiber used by pulp and paper mills comes from wood chips, forest residuals, and sawmill manufacturing residues – wood sources that cannot be traced back to an individual forest plot. The EUDR traceability requirement will be nearly impossible for a significant segment of the U.S. paper and pulp industry to comply with.


Additionally, the EUDR imposes a concerning requirement that for all timber and timber-derived products entering the EU, the originating landowners be identified and their contact information be made available. This requirement risks disclosure of confidential information between business partners and could disrupt long-standing landowner-producer relationships. Additionally, it is concerning that the regulation does not identify who would have access to this proprietary data or how the data would be used for enforcement.

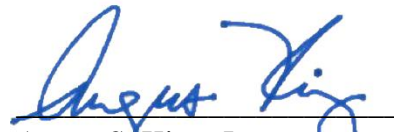
Proper stewardship has led to an American ecosystem of forests that are healthy and growing. According to the U.S. Forest Service, more than one billion trees are planted each year in the United States and total forest area increased by 18 million acres between 1990 and 2020. That is why we urge USTR to engage with their EU counterparts to ensure that EUDR implementation focuses on countries in which illegal deforestation is occurring.


As USTR continues to engage with European regulators, we urge the agency to seek clarity on the EUDR's traceability requirements, data reporting, and country benchmarking. We ask that USTR encourage the EU to recognize that the United States has robust regulatory standards to protect the long-term health of U.S. forests. This will help American paper and pulp producers achieve compliance under these new standards and ensure that the United States and the European Union can maintain its mutually beneficial trade relationship in paper and pulp products.

We appreciate your attention to this matter and for your consideration of these concerns. We ask that you keep Congress apprised of relevant developments as they occur.

Sincerely,



Marsha Blackburn
United States Senator



Angus S. King, Jr.
United States Senator



Ted Budd
United States Senator


Debbie Stabenow
United States Senator


Bill Hagerty
United States Senator


Mark Warner
United States Senator


Thom Tillis
United States Senator

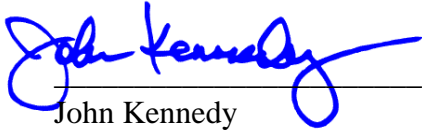

Raphael Warnock
United States Senator



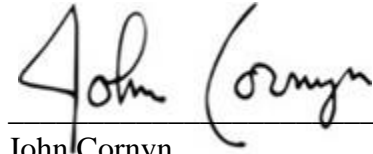
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Tammy Baldwin
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John Kennedy
United States Senator



John Cornyn
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Susan M. Collins
United States Senator



Tim Kaine
United States Senator



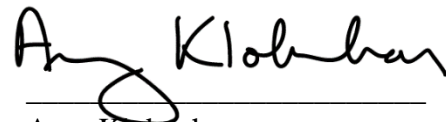
Tim Scott
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Mike Braun
United States Senator



Tommy Tuberville
United States Senator



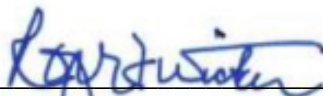
Amy Klobuchar
United States Senator



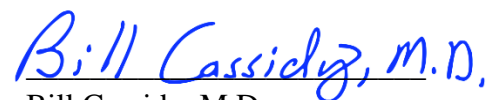
Katie Boyd Britt
United States Senator



Lindsey O. Graham
United States Senator



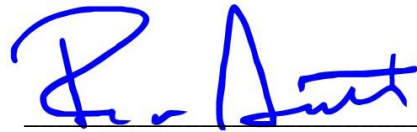
Roger F. Wicker
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Bill Cassidy, M.D.
United States Senator



Tom Cotton
United States Senator



Rick Scott
United States Senator



Ted Cruz
United States Senator



Ron Johnson
United States Senator



Marco Rubio
United States Senator

CC:

The Honorable Thomas J. Vilsack
United States Secretary of Agriculture

The Honorable Gina M. Raimondo
United States Secretary of Commerce