

European and International Booksellers Federation (**EIBF**), European Magazine Media Association (**EMMA**), European Newspaper Publishers' Association (**ENPA**), European Publishers Council (**EPC**), Federation of European Publishers (**FEP**), News Media Europe (**NME**)

Excluding books, newspapers and magazines from the EUDR protects vital democratic and cultural sectors from unnecessary harm, all without weakening the Regulation's objectives and environmental ambition

We, the undersigned organisations representing Europe's press and book sectors, warmly invite the Governments of the EU Member States to uphold the choice made by the European Parliament to restore the original Commission proposal regarding the exclusion of printed products from the scope of the EU Deforestation Regulation.

Printed products were initially excluded from the Commission proposal for very good reasons; their inclusion was requested by the Parliament during the last trilogue, without an impact assessment. Now that the Parliament itself has redressed the situation, the Commission and Council should have no reason to disagree – since this corresponds to their original stance.

Printed products represent a small part of the demand for paper (for books, no more than 10%), and paper in turn drives a small part of the demand for wood – and is largely produced using wood chips, a byproduct of wood production that otherwise become waste materials. The study assessing the impact of the EU Timber Regulation estimates that printed products are equivalent in volume to just 1.25% of all wood-based imports in the EU.

Let it be clear that our sectors are fully aligned with the goals of the EUDR. We have already independently developed robust standards and targets for reducing emissions, and we are implementing ways of rationalising our use of resources. Today, a vast majority of paper used by European publishers to produce their books comes from PEFC- or FSC-certified supply chains (with levels as high as 98% in major markets, such as France), while newspapers are largely recycled. European publishers invest in technology to improve sales forecasts, thus optimising print runs and paper consumption, as well as reducing the environmental impact of distribution – while keeping in mind that reading on paper remains the preferred choice for readers and presents specific advantages, particularly for learning and children's development of reading skills.

Although publishers, booksellers and other actors of the print media value chain have worked hard to prepare for the EUDR, seeking ways to adapt their IT systems and information flows, it has become clear that it imposes a disproportionate burden downstream of the supply chain. Treating printed products as commodities is simply incompatible with their role as vehicles for information and content. Moreover, the highly mixed nature of printed products from a manufacturing point of view makes the principle of traceability impossible to apply in a meaningful or useful manner (one estimate puts the number of plots of land referable to one book at 300,000).

A delay in the application of the EUDR will not resolve its inherent contradictions. Even if the final text includes potential simplifications, such as limiting due diligence obligations mainly to first operators, this would still fail to address key problems. Specifically, it would not alleviate the difficulties for publishers who must print abroad (often without an alternative, such as for specific children's books), nor would it mitigate the substantial barrier the Regulation will create for books, newspapers, and journals imported from the UK, the US, and other non-EU countries.

This impact will be especially detrimental for schools, libraries, universities and researchers, thus delivering a hard and unjustified blow to cultural diversity, research and science in the EU, and seriously harming our competitiveness.

We therefore once again call on EU Members States to agree to restore the original scope of the EUDR with regard to printed products, accepting their removal from the current text – a decision that will not weaken the Regulation in any way but will avoid serious consequences for publishers of books, newspapers and magazines, for booksellers and newsstands, and for culture and education in Europe.

The signatories:

European and International Booksellers Federation (EIBF): <https://europeanbooksellers.eu/>

European Magazine Media Association (EMMA): <https://www.magazinemedi.eu/>

European Newspaper Publishers' Association (ENPA): <https://www.enpa.eu/>

European Publishers Council (EPC): <https://www.epceurope.eu/>

Federation of European Publishers (FEP): <https://fep-fee.eu/>

News Media Europe (NME): <https://www.newsmediaeurope.eu/>