Thanks for your response and sorry for the delay in following up.

While the overall modalities are indeed yet to be finalised, it’s no secret that there are already numerous questions that arise regarding practicalities for the implementation. Given the important changes that the requirements will represent for our sectors, we need to start thinking about solutions to the important practical obstacles that our companies have warned us about. Without addressing these, it will be difficult to develop useful guidelines and make the regulation work.

There are serious concerns that much of what companies are expected to deliver is out of their direct control, hence difficult to deliver in the expected timeframe. It is clear that complying with the requirements will also require serious involvement from the public sector, both at EU and producing country level. This is something we feel we need to integrate in our reflection on guidelines for operators.

If you add to this that the chain of custody requirements appear as fundamentally different from current practice at least in our supply chains, changes will not happen overnight and the lead-in time will be short considering the changes that are expected from the many intermediates across these supply chains that have not even heard about an up-coming legislation.

So in short, there is already a lot of pressure for explanation and guidance. We cannot provide the full responses, obviously, but it is important to gather information about the main challenges that will need to be addressed to make the issuance of guidelines possible. Therefore, we need further clarification to spot those aspects that will require identifying specific solutions.

I do think that it may be valuable to integrate your thoughts early in this process. I am sure the experience with the timber regulation can provide you with some good reference for process and scope, but you will need to add to it agriculture commodity-specific expertise, which we are happy to work on to make guidelines relevant for our sectors.
Concretely, we can schedule a meeting in the course of October, but I am also available for an informal chat with you around a coffee to start scoping the topics, if you prefer.

Best regards

On Thu, 15 Sept 2022 at 08:24, [redacted]@ec.europa.eu wrote:

Dear [redacted],

Thank you for your messages. This ADP meeting was indeed a good opportunity to have an in-depth exchange and share views between all stakeholders on the issue.

Regarding the ongoing process, indeed we now got the Parliament’s views which will help make good progress in the negotiations. As regards the issue of guidelines we have very good experience on this within the EU Timber Regulation implementation where strong involvement of private sector has been a fact to make sure that the legislation is applicable and to help the sector and all stakeholders to comply with the new obligations. We will be happy to engage with you on this in due time, however, it seems a bit early to start discussing the details of potential guidelines until we have agreed the broader modalities? but happy to hear from you more on what you had in mind in terms of practicalities.

Best regards,

From: [redacted]@fediol.eu
Sent: Wednesday, September 14, 2022 10:23 AM
To: [redacted]@ec.europa.eu
Cc: FEDIOL Secretariat <fediol@fediol.eu>; [redacted]@fediol.eu
Subject: Re: Preparing next stage

Dear [redacted],
We would be keen to resume contacts and exchange on practical implementation aspects as suggested below.

Thank you for providing such opportunity.

Best regards

On Wed, 6 Jul 2022 at 10:54, Fedlol Eu wrote:

Dear

I hope you had good discussions at the ADP meeting and a safe trip back to Brussels.

With the Council having formulated its general approach and the Parliament getting closer to a vote in ENVI and then in plenary, the starting points for further negotiations between institutions are certainly ambitious, but little has been done to give the provisions a chance of fitting into our supply chains' functioning and for making an impact on the ground.

Calls for sector specific guidelines are still prominent in the discussions and we wonder whether it wouldn't be worth organising an in-person meeting shortly after the vacation period to dig into some of the practicalities, for which we will need to find operational solutions.

We think this could help preparing somehow the ground for the next stage in the negotiations, and we are certainly willing to pursue constructive discussions. I am happy to further discuss. Thanks for letting me know whether that could be of interest to you as well.
Kind regards

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