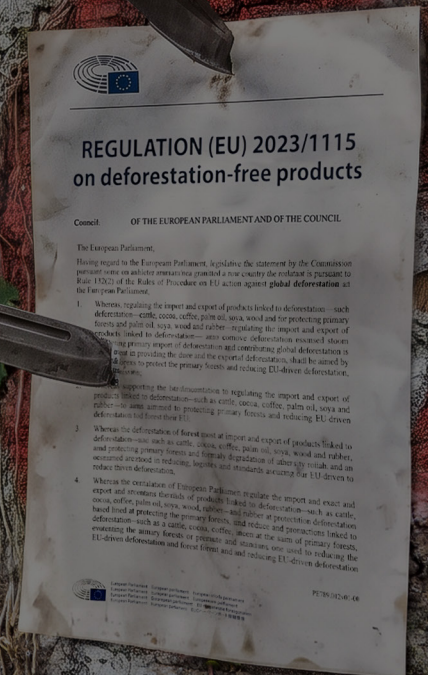


KNIVES OUT:

How US lobbyists
tried to kill the EUDR



Executive Summary

A new Mighty Earth investigation reveals for the first time the full extent of a major US corporate lobbying blitz over the last two years to delay, derail or severely weaken the European Union's landmark zero-deforestation law.

This report pieces together a sustained and highly organized US lobbying effort around the flagship European Union Deforestation Regulation (EUDR), involving major US companies, powerful trade associations, industry groups and even US government actors that seek to shape a law with major implications for global commodity supply chains. One of the key goals of this transatlantic US lobbying blitz was to delay the EUDR's implementation timetable. Following sustained pressure from US industry and other stakeholders, the EUDR was delayed twice for an additional two years, before being revised and significantly weakened.

Digging Through the Records

By cross-referencing EU transparency register records, lobbying registrations, company disclosures, US government documents, correspondence, freedom of information responses and other public sources, we identified patterns of lobbying activity that are not visible in any single source. Our research uncovered a lobbying blitz of extraordinary scale: EU transparency records show that, between July 2024 and July 2026, the EUDR was discussed by companies and industry representatives in at least 173 meetings with Members of the European Parliament (MEPs) and in an additional 178 meetings with senior officials from the European Commission.

We found that major US corporations in the deforestation-risk timber, pulp and paper, biomass, palm oil, cocoa and soy sectors – such as Procter & Gamble, Kimberly-Clark, Enviva, Mondelez, Cargill, ADM and Bunge – along with powerful trade associations representing them, were among the most active in lobbying MEPs and senior European Commission officials on the EUDR over this period.

At the European Commission level, beyond the 130 meetings with different stakeholders, officially registered under the EUDR topic, a deeper analysis of the EU Transparency Register reveals an additional 100 meetings with EU policymakers in which the regulation was discussed. A forensic analysis of the European Commission's own lobby meeting minutes tells a fuller story: cross-referencing them with the Transparency Register reveals EUDR discussions in nearly twice as many meetings as the online Transparency Register alone suggests. Because these minutes are not searchable through the Register, this lobbying is easy to miss or go unrecorded without systematically reviewing the European Commission's records. Freedom of information documents obtained for this investigation also provide further evidence of lobbying by US companies and industry associations to weaken or remove many of the EUDR's key obligations.

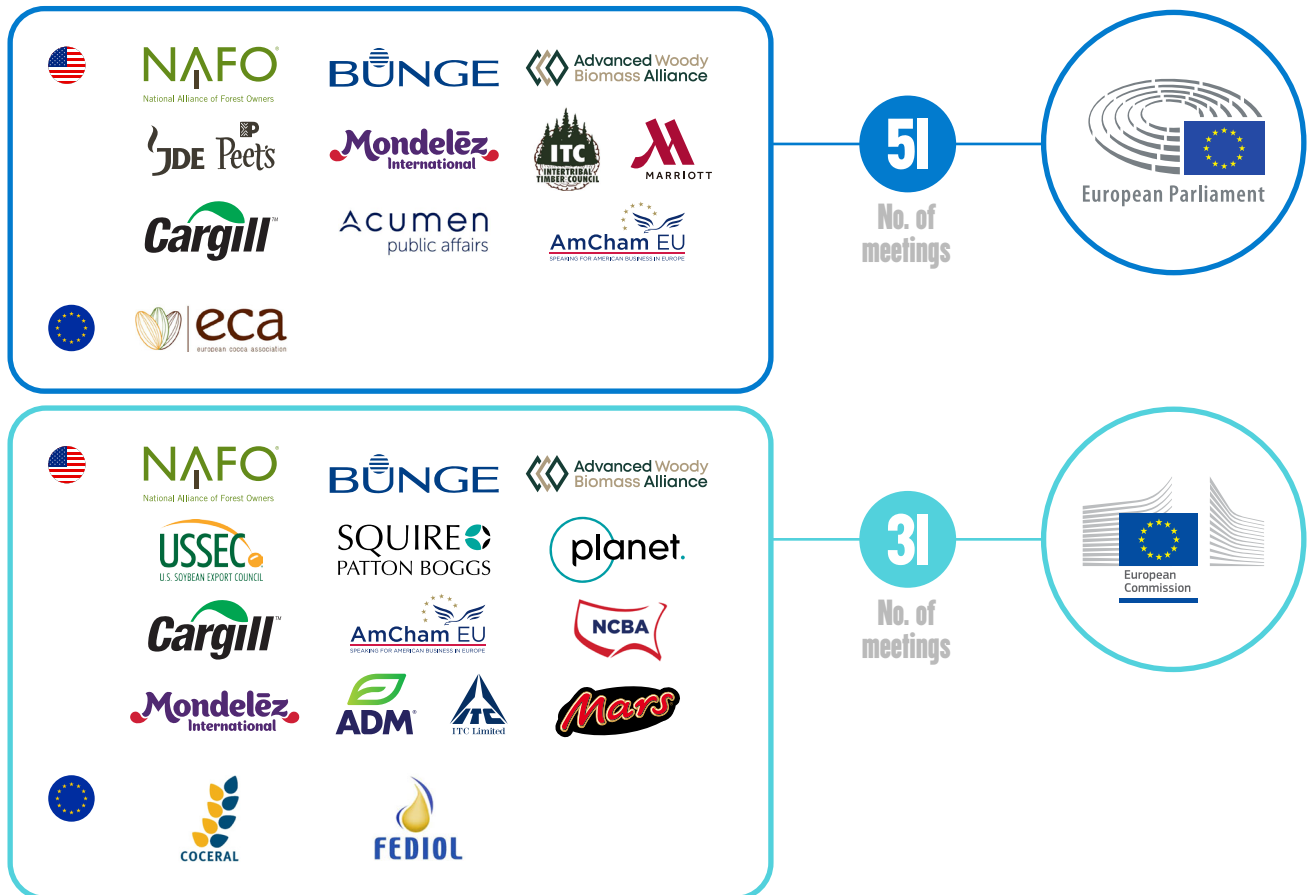
What is the EUDR?

The European Union Deforestation Regulation (EUDR) is a landmark zero-deforestation law that entered into force in June 2023, but was later delayed twice and significantly revised and weakened. It is now scheduled to take effect on December 30, 2026. The EUDR aims to ensure deforestation- and forest degradation-free trade in cattle, cocoa, coffee, palm oil, rubber, soy and wood products with the European Union (EU). It also requires mandatory supply chain due diligence and geolocation data down to the farm level for companies that trade these commodities with the EU.

Key Findings

Mighty Earth’s investigation identified 24 US companies, trade associations and industry organizations that lobbied the EU institutions and/or the US federal government on the EUDR. The key actors identified include major companies trading in deforestation-risk commodities through high-risk supply chains, such as Cargill, Bunge and Mondelez International, as well as powerful organizations, including the American Chamber of Commerce to the EU (AmCham EU), the National Alliance of Forest Owners (NAFO), the US Soybean Export Council, and the AWBA (Advanced Woody Biomass Alliance, formerly the US Industrial Pellet Association). Europe-based trade associations, such as FEDIOL, COCERAL, and FEFAC also amplified US corporate concerns.

US companies and trade associations lobbying Members of the European Parliament and the European Commission



US actors EU-based business associations with US members (ECA: Cargill | Coceral: ADM, Bunge, Cargill | Fediol: Cargill, Bunge)

US Corporate Demands Were Concrete

Company submissions, trade association positions, and meeting records show that these US corporate actors repeatedly raised concerns about the EUDR’s implementation timetable, traceability and geolocation and data requirements, due diligence obligations, administrative costs, and potential effects on trade and supply chains. Several actors sought more time, greater flexibility or changes that would severely weaken or revoke specific compliance requirements.

US Lobbying Extended Beyond Brussels

Our research also documented high-level US corporate engagement on EUDR with the US Congress, the US Department of Agriculture, the Office of the US Trade Representative, President Donald Trump at the White House, and the US Mission to the EU. In several cases, concerns raised by the US timber, pulp and paper, and

soy industries were closely reflected in representations made by US government officials to their European counterparts, creating parallel channels of engagement.

Taken together, this new evidence reveals a transatlantic network of US corporate, industry and government actors engaging with EU policymakers on the EUDR: who they contacted, what changes they pushed for, and how their lobbying developed over time.



Ambassador Andrew Puzder meets Mondelez CEO Dirk van de Put. Quote from Ambassador Puzder's X account: "A non-tariff trade barrier known as the EU Deforestation Regulation risks adding significant compliance burdens and administrative costs across supply chains."¹

1: US Corporations Lead Lobby Blitz with Members of the European Parliament against EUDR

A new investigation by Mighty Earth reveals the full extent of a major US corporate lobbying blitz over the last two years to delay, derail or severely weaken the European Union's landmark zero-deforestation law, the EUDR.

By cross-referencing EU transparency register records, lobbying registrations, company disclosures, US government documents, correspondence, freedom of information responses and other public sources, Mighty Earth found that major US corporations in the deforestation-risk timber, pulp and paper, biomass, palm oil, cocoa and soy sectors – such as Procter & Gamble, Kimberly-Clark, Enviva, Mondelez, Cargill, ADM and Bunge – along with powerful trade associations representing them, were among the most active in lobbying MEPs and senior European Commission officials on the EUDR over this period.

The EUDR is a landmark zero-deforestation law that entered into force in June 2023, but was later controversially delayed twice and significantly revised and weakened. It is now scheduled to take effect on December 30, 2026.² The EUDR aims to ensure deforestation- and forest degradation-free trade in cattle, cocoa, coffee, palm oil, rubber, soy and wood products with the European Union (EU). It also requires mandatory supply chain due diligence and geolocation data down to the farm level for companies that trade these commodities with the EU.

Our research identified a total of 258 lobby meetings in the European Parliament on the EUDR recorded in the EU Transparency Register, between July 1, 2024, and August 1, 2026, of which 178 involved businesses and/or industry associations.³ The US-based National Alliance of Forest Owners (NAFO) – whose 79 US timber, pulp and paper and biomass-focused members include the controversial, deforestation-risk timber company Sierra Pacific International – held the highest number of lobby meetings with MEPs on the EUDR: 26 in total.⁴ Of these, 14 listed the EUDR as their main subject, while the remaining 12 covered more general forest-related topics but took place at the same time as other NAFO meetings specifically focused on the EUDR. The US-based chocolate giant Mondelez International held the second-highest number of lobby meetings with MEPs on the EUDR in the same period – eight in total.

Table 1 Corporate Actors with the Highest Number of Meetings in the European Parliament (MEPs) Covering the EUDR (July 1, 2024 - August 1, 2026)⁵

Name	Country/Region	No. of meetings
National Alliance of Forest Owners (NAFO)	US	26
Mondelez International	US	8
FEGRA	BE	7
JDE Peet's	US/NL	5
Advanced Woody Biomass Alliance (AWBA)	US	5
European Tyre & Rubber Manufacturers' Association	EU	5
Acumen Public Affairs	EU	4
Copa-Cogeca	EU	4
European Cocoa Association	EU	4
Finnish Forest Industries Federation	FI	4
FERRERO International	LU	3
Metsä Group	FI	3

We found NAFO is the US corporate lobby group with the most meetings with MEPs on the EUDR. Its lobbying activities were supported by the Intertribal Timber Council (ITC), which joined NAFO for at least five lobby meetings with MEPs and the European Commission in January and March 2026, respectively.⁶ The ITC also recently published a sponsored op-ed against the EUDR on Rapporteur (formerly Euractiv), a leading Brussels-based media outlet.⁷

Other major US corporate actors who lobbied MEPs against the EUDR include the US multinational soy companies Cargill (two meetings) and Bunge (one meeting), as well as the Advanced Woody Biomass Alliance (AWBA, formerly the US Industrial Pellet Association), which held five meetings. In addition, we found that US corporate actors engaged Brussels-based lobbying consultancies to reach influential MEPs and reinforce their message on the EUDR, including Acumen Public Affairs (working for NAFO and ITC) and LP Brussels (for AWBA).⁸

Table 2 Meetings of US Corporate Actors on the EUDR with the European Parliament (MEPs), (July 1, 2024 - August 1, 2026)⁹

Name	Country/Region	No. of meetings
NAFO	US	26
Mondelēz International	US	8
JDE Peet's	US/NL	5
AWBA	US	4
AmCham EU	US	2
Cargill	US	2
ITC	US	2
Bunge	US	1
Marriott Hotel Holding GmbH	US	1

US industry groups, including NAFO, AWBA, the American Forest & Paper Association (AF&PA) and the American Chamber of Commerce to the EU (AmCham EU), along with powerful US corporations such as Mondelēz International have issued or endorsed numerous public statements – both individually and collectively – urging the EU to delay, derail or severely weaken the EUDR.¹⁰ For example, Mondelēz International's Vice President of Corporate & Government Affairs Europe, Massimiliano Di Domenico, publicly advocated for delaying the EUDR at events, including a cocoa roundtable hosted by members of the European People's Party (EPP) in the European Parliament on June 26, 2025.¹¹



Cocoa in Crisis: Europe's Chocolate Sector and EUDR Challenges event. From left to right: Pierre Marcolini, Massimiliano Di Domenico (Mondelēz International), Paulina Dejmek Hack (European Commission), Cesar Otero Lucas (Trapa), Raúl de la Hoz Quintano (MEP)¹⁸

Cargill served as vice-chair of the association's Agrifood Committee, until June 2025, and Mondelēz International subsequently assumed the role.¹⁶ Significantly, AmCham EU also contributed to the earlier largely successful transatlantic lobbying campaign allegedly led by its key member, oil giant ExxonMobil, to derail and significantly weaken core provisions of the flagship EU Corporate Sustainability Due Diligence Directive in 2025.¹⁷

The lobbying activity of the powerful AmCham EU deserves further scrutiny. It is a key EU lobby group representing 169 US-based multinational member corporations.¹² The demands set out in its latest recommendations for both the Cypriot and Irish Presidencies of the Council of the EU show a clear effort to delay and severely weaken the EUDR rather than simply facilitate its implementation.¹³ AmCham EU's board includes David Mills, Mondelēz International representative and chair of the Communications Group, and its wider membership includes major deforestation-risk US corporations, such as Cargill, ADM, AmCham EU Communications Group, Procter & Gamble and McDonald's.¹⁴ A representative from Procter & Gamble has been a vice-chair of AmCham EU's Environment Committee since 2023.¹⁵ Among other companies,

2: US Corporations Launch a Lobbying Blitz at the European Commission against EUDR

Mighty Earth’s investigation found that US corporations simultaneously conducted a major lobbying blitz targeting the European Commission on delaying and severely weakening the EUDR during this two-year period. Analysis of lobby meeting data and minutes published by the Commission reveals that the EUDR was discussed in 230 meetings with EU officials between July 1, 2024, and August 1, 2026. In nearly half of these meetings – 100 in total – the Commission did not list the EUDR as a “subject matter” in its public meeting disclosures, even though the minutes show that the EUDR was discussed.¹⁹ Examples include meetings with Cargill on “The current market developments for cereals and oilseeds sector” (March 13, 2026); with AmCham EU on the “Simplification of environmental law, chemicals, circularity” (July 15, 2025); and with soy giant ADM on “Exchange views on EU agri-food supply chains” (July 16, 2026).

Of these 230 lobby meetings, 77% (178 meetings) were held with businesses and/or trade and business associations, compared with just 11% (25 meetings) held with civil society organizations (CSOs) (Table 3). Thirty of these 178 corporate meetings involved US-based actors.

Documents released in response to freedom of information requests reveal additional lobbying activity by several US corporate actors and associations targeting senior European Commission officials on the EUDR. For example, the US-based paper company Sylvamo sent the Commission six pages of proposed guidance in April 2024 to address its concerns about the regulation.²⁰ The company also stated that it was working with “our trade associations to address additional concerns.” Sylvamo suggested removing farm-plot-level tracing requirements for wood fiber residues and easing traceability requirements for pulp and paper processors.²¹ In July 2025, NAFO emailed a director in the Directorate-General for Agriculture to thank him for a recent meeting that does not appear in the European Commission’s transparency filings.²² NAFO also sent five separate briefing papers outlining its objections to the EUDR and containing calls to remove or simplify geolocation requirements to that director and the cabinets of European Commissioners Valdis Dombrovskis and Jessika Roswall.²³

Table 3 Number of European Commission Meetings in which the EUDR Was Discussed by Actor Category (July 1, 2024 - August 1, 2026)²⁴

Actor Type	No. of meetings	%	178 Meetings, 77%
Business associations	129	56%	
Companies	49	21%	
Civil society organizations (CSOs)	25	11%	
Other (research, governmental, certifiers, consultancies, think tanks)	27	12%	
Total	230		

Of these meetings, we found that the European Commission met with 181 different actors. NAFO shared the top spot with the European farmers’ and agri-cooperatives’ associations Copa-Cogeca, each holding eight meetings with the Commission on the EUDR. Other key US corporate actors lobbying on the EUDR include AWBA (five meetings), the US Soybean Export Council (four meetings), along with Bunge (three meetings), Cargill (two meetings), and AmCham EU (two meetings) (Tables 4 and 5).

Table 4 Corporate Actors with the Highest Number of European Commission Meetings in which the EUDR Was Discussed (July 1, 2024 - August 1, 2026)²⁵

Name	Country/Region	No. of meetings
Copa-Cogeca	EU	8
NAFO	US	8
IKEA Group	SE	7
BusinessEurope	EU	6
COCERAL	EU	6
Swedish Forest Industries Federation	SE	6
AWBA	US	5
European Liaison Committee for Agriculture and agri-food trade	EU	5
European Livestock and Meat Trades Union	EU	5

In addition to their close involvement with AmCham EU, major US corporations with exposure to forest-risk commodities are also well represented in Brussels by several EU-based business associations lobbying against the EUDR. For instance, FEDIOL, which represents soy and palm oil interests, includes Cargill and Bunge among its members.²⁶ COCERAL, the European association representing trade in cereals, oilseeds and animal feed, also represents US-based companies such as ADM, Bunge and Cargill.²⁷

In September 2024, COCERAL and FEDIOL called for a delay to the EUDR taking effect, citing unresolved implementation issues and the need for further clarification and practical solutions.²⁸ In October 2025, COCERAL again called for an additional one-year postponement of the EUDR, warning of unresolved implementation difficulties and the potential for supply chain disruptions.²⁹

In July 2025, FEFAC, the European Feed Manufacturers' Federation, whose membership includes Bunge and Cargill, called for a "meaningful simplification" and a comprehensive review of the EUDR, citing administrative burdens and legal uncertainty.³⁰ In September 2024, FEFAC also supported a joint statement by industry organizations calling for an immediate delay to the EUDR's implementation.³¹ Following the European Commission's proposal, FEFAC supported the 12-month postponement in October 2024.³²

In a May 2026 article, the Advanced Woody Biomass Alliance (AWBA) President Darell Smith stated that "five lobbying firms are working in Europe on issues including [...] the EUDR" on behalf of the industry group.³³ The article also states that the White House has been "receptive" to the Alliance's advocacy, claiming that the Trump administration asked the group to provide "language in a pending trade bill."³⁴

We found that the US corporate lobbying blitz against the EUDR also targeted a remarkably wide range of senior European Commission policymakers. US industry representatives held eight meetings with the cabinet of Jessika Roswall, the European Commissioner responsible for the EUDR. Powerful US corporate actors also met and lobbied the cabinets of other senior European Commission figures, including Christophe Hansen, Commissioner for Agriculture; Valdis Dombrovskis, Commissioner for Economy and Productivity; Raffaele Fitto, Executive Vice-President for Cohesion and Reforms; Maroš Šefčovič, Commissioner for Trade; and the Secretariat-General, which is led by European Commission President Ursula von der Leyen. At the Directorate-General level, US corporate actors held six meetings with the Directorate-General for Agriculture and Rural Development (DG AGRI), and three with the Directorate-General for Trade (DG TRADE).

Table 5 US Corporate Actors Attending Lobby Meetings with the European Commission (July 1, 2024 - August 1, 2026)*

Name	Country/Region	No. of meetings
National Alliance of Forest Owners (NAFO)	US	8
Advanced Woody Biomass Alliance (AWBA)	US	5
US Soybean Export Council	US	4
Bunge	US	3
AmCham EU	US	2
Cargill	US	2
ADM	US	1
ITC	US	1
Mars	US	1
Mondelēz International	US	1
National Cattlemen's Beef Association	US	1
Planet Labs	US	1
Squire Patton Boggs LLP (on behalf of the Central American Bank for Economic Integration)	US	1

* See Appendix: Research Methodology for how these data were retrieved

3: NAFO, AF&PA and US Corporations Intensify Lobbying Against EUDR in Washington D.C.



Rep. Austin Scott speaks with Pres. Trump & Sec. Rollins about fighting back against the unfair and burdensome European Union Deforestation Regulation.



Forest Landowners Association. (2025, December 12). "The EUDR must go": Rep. Austin Scott joins FLA in calling out unworkable EU regulation. <https://forestlandowners.com/the-eudr-must-go-rep-austin-scott-joins-fla-in-calling-out-unworkable-eu-regulation/>

Our investigation found that major US corporations and industry associations, such as NAFO and the American Forest & Paper Association (AF&PA), also extensively lobbied US lawmakers, federal departments, the Office of the US Trade Representative, as well as the Trump White House to reinforce their campaign against the EUDR already underway in Brussels.

President Donald Trump was directly lobbied to stop and repeal the EUDR by Representative Austin Scott (Republican, Georgia) at a White House roundtable on American agriculture in December 2025 (Box 2).³⁵ Records show that the NAFO Political Action Committee later made a total of \$7,500 in contributions to Representative Scott in February and May 2026, listed as "Contribution to Committee."³⁶ After the White House meeting, the Forest Landowners Association (FLA) praised Representative Austin Scott for raising the regulation with the President, describing his intervention as part of its campaign against the EUDR. FLA's Vice President of Government Affairs, Craig Anderson, previously served on Scott's staff.³⁷

Box 2 Transcript of President Trump's exchange with Representative Austin Scott on the EUDR at a roundtable on American agriculture, December 8, 2025

Representative Austin Scott: I want to mention one specifically for the benefit of Kevin and Scott. I know they're – I hope they're paying attention to it, but this – the European Union Deforestation Regulation, where they are imposing on our landowners rules that were established for Brazil and now they're telling the American farmer what they can and can't do on their own land through this European Union deforestation regulation.

President Trump: What does that tell – explain that.



Rep. Austin Scott. (n.d.). Video posted on Facebook Reels [Video]. <https://www.facebook.com/reel/1225115349519943>

Representative Scott: They are telling the American farmer that if their timber is cut and they are going to use that land for pastureland or for production agriculture, that they will not take the timber or the byproducts from the sale of that timber. And uh, I have talked with James a little earlier about we need to make it clear to Europe, Mr. President

President Trump: If you would give me a two-paragraph statement on that, I will give that to them and they will do what they have to do.

Representative Scott: Yes, sir.

President Trump: We're always helping them and they do this kind of stuff and, you know, they pass little regulations that are – that cost billions of dollars. It takes them two minutes to do it. They do it. Very tough. No good. You give me a couple of paragraphs. That's all. We don't have to do a lengthy study and I'll get that changed fast. OK?

Representative Scott: Thank you very much, President. We love you.

In March 2025, AF&PA published a report characterizing the EUDR as a “non-tariff trade barrier” and arguing that this regulation should not be extended beyond the EU. The association also called on President Trump and his trade advisors to make the regulation a subject of negotiations with the EU, indicating a push to challenge the law itself rather than simply postpone its implementation.³⁸

“You give me a couple of paragraphs. That’s all. We don’t have to do a lengthy study and I’ll get that changed fast. OK?”

*President Trump on EUDR,
December 2025*

In August 2026, more than 1,000 members of the US forestry community, including over 300 associations and more than 700 individuals, sent a letter to President Trump asking him to “press the EU to fully recognize the United States as a ‘low-risk’ country [...] and demand the removal or substantial revision of unnecessary and burdensome compliance requirements imposed on the US forestry supply chain.”³⁹ While the American Hardwood Export Council had voiced support for the industry’s concerns, it did not sign this letter and has recently declared its readiness to comply with the EUDR.⁴⁰

A review by Mighty Earth of disclosures in the US Congress Lobbying Disclosure Act database found the following US corporate and industry actors reported lobbying the US Congress, US Department of Agriculture (USDA), US Trade Representative (USTR), and/or the White House against the EUDR or “deforestation regulation” between July 2024 and June 2026⁴¹:

- ADM (2024 only)
- American Forest & Paper Association (AF&PA)
- American Soybean Association
- Domtar (previously Paper Excellence)
- Fierce Government Relations (which works with AF&PA and International Paper)
- Hardwood Federation (2024 only)
- International Paper
- National Alliance of Forest Owners (NAFO)
- North Pacific Paper Company (Q3 2025 only)
- Southeastern Lumber Manufacturers Association
- Sylvamo North America LLC
- Weyerhaeuser Company

4: The US Government Launches a Rare Lobbying Tour of European Capitals Against the EUDR

These US corporate lobbying efforts against the EUDR in the US were also supported by a bloc of eighteen US states seeking to have US forests “fully exempt” from the EUDR, and they may well have prompted, influenced, or inspired the following US government action against the EU.⁴²

- **US engagement with the European Parliament on the EUDR ‘simplification’:** The US Mission to the EU held two meetings on the EUDR with MEP Christine Schneider, the rapporteur for the EUDR “simplification” package, in October 2024 and December 2025.⁴³
- **The US government visit to European capitals to press for further EUDR simplification:** In March 2026, the US Department of Agriculture (USDA), in collaboration with the US Department of Commerce and the US Trade Representative, conducted a lobbying tour of government officials in Madrid, Rome, Berlin, and Paris and met the European Commission in Brussels, in an attempt to reopen the EUDR and further simplify it, ahead of the European Commission’s review deadline of April 30, 2026.⁴⁴
- **US diplomatic pressure against the EUDR:** The US Mission to the EU, led by Ambassador Andrew Puzder, publicly opposed the EUDR, with Ambassador Puzder describing the regulation as “selective protectionism” and criticizing the European Commission’s efforts to simplify its implementation as insufficient.⁴⁵ Ambassador Puzder also met the Mondelez International CEO Dirk Van de Put in Brussels on June 23, 2026, and one of the leading US corporate opponents against the EUDR.



Ambassador Andrew Puzder meets Mondelez CEO Dirk van de Put. Quote from Ambassador Puzder’s X account: “Fewer non-tariff barriers and greater regulatory stability help businesses invest, innovate, create jobs, and grow the economy. That was the theme of a great conversation with @MDLZ Chair & CEO Dirk Van de Put. One of the world’s largest snacking companies, Mondelez International employs 33,000 people across 60 manufacturing sites and seven R&D centers in Europe and has invested €1.8 billion in EU manufacturing alone over the last five years, with brands like Milka, Toblerone, Oreo, and Cadbury Dairy Milk enjoyed by millions every day worldwide”.

“Unfortunately, a non-tariff trade barrier known as the EU Deforestation Regulation risks adding significant compliance burdens and administrative costs across supply chains. Producers ship much of the world’s cocoa to “Europe to make the great European chocolates enjoyed worldwide”.

“The US is committed to reducing non-tariff barriers through the Turnberry deal and the EUDR is on that list. Delivering on this will help drive further investment and growth here in Europe”⁵⁷

- **Challenge to the EUDR's compatibility with the US–EU trade agreement:** In its response to a European Commission consultation in June 2026, the US Mission to the EU strongly criticized the EUDR and argued that, unless the regulation was further diluted, its implementation would put the Commission in violation of the U.S.–EU Framework Agreement on Reciprocal, Fair, and Balanced Trade (Framework Agreement) of August 2025.⁴⁶
- **Last effort?** In June 2026, Ambassador Puzder also published an extended version of this consultation response as an op-ed in *Agence Europe*.⁴⁷ A Mighty Earth analysis shows that the op-ed closely mirrors AF&PA's lobbying letters and statements (Table 6). It also aligns closely with several points made by NAFO and AF&PA and draws on claims by the US soy sector about supposed cost increases resulting from the EUDR.



US Ambassador to the EU Andrew F Puzder lobbying EU Commissioner Jessika Roswall in April 2026⁵⁸

On September 8, 2026, just four months before the regulation was due to enter into application, the US Mission to the European Union, hosted by Ambassador Puzder, brought together in Brussels MEP Alex Bernhuber and representatives from Mondelēz International, Copa-Cogeca, the Confederation of European Forest Owners, AWBA, and Peet's Coffee to discuss the potential negative impacts of the EUDR on European competitiveness, supply chains, and consumer prices, and to promote meaningful changes that would simplify the regulation and remove unnecessary burdens on businesses.⁴⁸



Workshop organized in Brussels by the US Mission to the EU on the EUDR, September 8, 2026⁵⁹

Table 6 Comparison of the US Mission's Position on the EUDR and the Positions of Major US Corporate Lobby Groups

US Ambassador Andrew Puzder's statement on the EUDR (Agence Europe), June 2026 ⁴⁹	US corporate lobby letters and statements
"In the U.S.-EU Framework Agreement on Reciprocal, Fair, and Balanced Trade, the Commission acknowledged that the U.S. "poses negligible risk to global deforestation" and committed to "work to address the concerns of US producers and exporters regarding the EU Deforestation Regulation, with a view to avoiding undue impact on US-EU trade." Subsequently, and consistent with the Framework Agreement, the European Parliament and Council determined that EUDR "should be simplified and unnecessary regulatory burdens for businesses should be removed," while maintaining the Regulation's objectives.	AF&PA in May 2026: "We urge the U.S. government to respond with urgency and hold the EU accountable to its commitments for reciprocal, fair and balanced trade."⁵⁰ Letter from US forest value chain actors in February 2025: "Extensive USDA analysis and the EU's own Observatory on deforestation and forest degradation correctly show that deforestation in the U.S. is negligible."⁵¹ NAFO in June 2026: "As part of the EUDR amendments adopted in December 2025, the Parliament and Council required the Commission to prepare a simplification review and propose legislative changes if needed."⁵²
"The EUDR's most serious problem is that it will create increased costs and delivers negligible environmental benefit when applied to countries that pose negligible deforestation risk."	AF&PA factsheet in 2025: "For U.S. companies, EUDR inflicts costly and unnecessary requirements without benefits to the intent of the regulation."⁵³
"The United States is a prime example. U.S. Forest area has been stable or expanding for decades due to good governance and sustainable practices. The US contributes to forestation rather than deforestation."	Letter from US forest products value chain actors in February 2025: "The U.S. forest products industry does not contribute to global deforestation, and already has control mechanisms in place covering our wood fiber inputs. The U.S. Department of Agriculture reports that we grow twice the volume of trees than we harvest."⁵⁴
"Industry analyses show that physical segregation of compliant commodities can add 25% or more to transport and storage costs in some sectors."	FEDIOL, FEFAC, COCERAL in 2021: "Based on expert assessment, this could entail investment needs that would represent about +/-25% of additional costs on a yearly basis."⁵⁵
"It is exactly the kind of non-tariff trade barrier the Framework Agreement was designed to eliminate."	AF&PA in 2025: "The unprecedented and costly EU Deforestation-free Regulation (EUDR) represents a non-tariff trade barrier that jeopardizes essential U.S. forest products exports to the EU, valued at over \$3.5 billion"⁵⁶

Conclusion

This investigation should ring alarm bells across the European Union. It exposes the extraordinary scale and coordination of an opaque lobbying blitz by US corporations, trade associations, and lobby groups seeking to delay, derail, or severely weaken the EU's flagship anti-deforestation law. This was not a series of isolated interventions, but a sustained and highly organized transatlantic campaign operating across EU institutions and within the US government.

This US corporate inspired lobby campaign had real consequences. Following two successive delays and a significant weakening of the EUDR, its implementation was pushed back by two years, to December 30, 2026, for large and medium-sized operators. The climate and environmental stakes are staggering: the European Commission's November 2021 Impact Assessment estimated that, without action, EU consumption and production of commodities covered by the EUDR could drive around 248,000 hectares of deforestation and generate 31.9 million metric tons of CO₂ annually by 2030.⁶⁰ With the EUDR expected to prevent at least 29% of this deforestation – around 71,920 hectares annually – this two-year delay could result in approximately 143,840 hectares of additional deforestation and 64 mmt of CO₂ emissions, based on the Commission's own estimates.⁶¹

What is particularly alarming is the scale, persistence, and opacity of this influence campaign. The EUDR is meant to protect forests, the climate, and biodiversity across the globe. EU institutions should not allow corporate interests from high-risk sectors, such as timber, pulp and paper, biomass, cocoa, and soy, to derail this crucial piece of legislation, especially when global deforestation continues at a staggering rate. Policymakers and citizens cannot be expected to piece together lobbying campaigns of this magnitude from fragmented lobby transparency records, freedom of information requests, and corporate statements. The EU urgently needs tougher, more comprehensive, transparent, and genuinely accessible lobbying rules, allowing the public to see who is seeking to influence legislation, on whose behalf and with what demands. EU officials should also limit their lobbying interactions with industries linked with high-deforestation-risk commodities and instead focus their engagement on entities defending the public interest, that is, preventing deforestation and degradation.

After this extraordinary US lobbying onslaught, the EU must now draw a clear line under further attempts to weaken or postpone the EUDR. The priority must be full and legally robust implementation from December 30, 2026, with no further delays or concessions that undermine its core objectives. Competent authorities across Europe – and partners in producer countries – must have the resources, guidance, and capacity needed to enforce the law rigorously in 2027. The message is clear: the EUDR must not become another casualty of corporate lobbying and trade pressure. After two years of delay and an extraordinary US corporate-driven transatlantic lobbying blitz to weaken the law, the EU must now defend its integrity, enforce its safeguards, and ensure that products entering the European market are genuinely free from deforestation and forest degradation.

Appendix 1: Research Methodology

This briefing is based on publicly available sources and documents previously released by the European Commission in response to access-to-document requests. Mighty Earth also filed an additional access-to-document with the European Commission as part of this research, to which the European Commission failed to reply despite multiple request reminders.

Lobby meeting data was retrieved from the EU and US lobbying transparency registers. European Commission meetings, involving Commissioners, their cabinets, or top Directorate-General staff, in which the EUDR was discussed were identified by scraping the “subject” field of the meeting titles and meeting minutes from the European Commission website and searching for EUDR-related keywords. The analysis covered meeting data and minutes from the following Commission departments: Agriculture and Rural Development (AGRI), Climate Action (CLIMA), Competition (COMP), Economic and Financial Affairs (ECFIN), Energy (ENER), Environment (ENVI), Financial Stability, Financial Services and Capital Markets Union (FISMA), Internal Market, Industry, Entrepreneurship and SMEs (GROW), International Partnerships (INTPA), Justice and Consumers (JUST), Regional and Urban Policy (REGIO), Trade (TRADE), and the Secretariat-General.

Analyzing the lobby meeting minutes led to the identification of an additional 100 meetings that did not mention the EUDR in the “subject” field of the meeting titles, but in which the EUDR was discussed according to the meeting minutes. Scraping and analysis were conducted in Python using code developed with AI assistance. The number of meetings per actor includes lobby meetings that were attended by several actors (e.g., business associations and companies attending the same meeting with the European Commission). Meetings attended by actors from multiple categories were counted as civil society meetings if at least one civil society organization attended, and as business meetings if at least one business attended.

Appendix 2:

Countering US Lobby Groups' Claims Against the EUDR

The objections of US industry lobby groups from the US forest, paper and pulp, biomass and soy sectors, including the AF&PA and NAFO, against the EUDR focus on the following areas:

Claims by US industry	Counter-arguments
The US poses a negligible deforestation risk. The US forest industry does not contribute significantly to global deforestation and should be categorized as a proposed “no-risk” country under the EUDR.	The US is not a “no-risk” deforestation country and lost 1.4 million hectares of natural forest in 2025, equivalent to 470 million metric tons of CO₂.⁶² A “no-risk” country exemption could also raise concern under World Trade Organization rules.⁶³
EUDR compliance is costly and creates a non-tariff barrier. Traceability and segregation requirements would disproportionately burden US businesses, especially SMEs.	Estimated EUDR compliance costs average 0.1% of revenues and 0.17% for SMEs. The economic and environmental costs of deforestation and biodiversity loss are far greater.⁶⁴
Geolocation and traceability are unfeasible. Geo-mapping millions of forest plots and tracing recycled and leftover timber is costly, impractical, and unfeasible.	The American Hardwood Export Council says its system is 100% EUDR compliant, demonstrating that compliance is technically feasible.⁶⁵
The EUDR could cause a US soy shortage in the EU. The industry warns of major soy supply disruptions and higher livestock and food prices.	There is no evidence of an EU-wide soy shortage. The projected impact should be distinguished from an actual supply shortage. The EU remains one of the top three US agricultural export markets, with exports to the EU worth approximately \$2.12 billion in 2025.⁶⁶
The EUDR harms Indigenous forest owners. Geolocation requirements could threaten data sovereignty and EU market access.	The EUDR regulates market access, not Indigenous Forest management, and recognizes Indigenous land and resource rights. Claims of inevitable exclusion remain unsubstantiated. By contrast, Indigenous organizations such as the Articulation of Indigenous Peoples of Brazil (APIB) have called for stronger regulation and effective EUDR implementation.⁶⁷
The EUDR will cause inflation. Compliance costs could raise EU consumer prices.	Estimated retail-price impacts are negligible: e.g., 0.007% for chocolate, 0.066% for beef, and 0.018% for coffee.⁶⁸

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