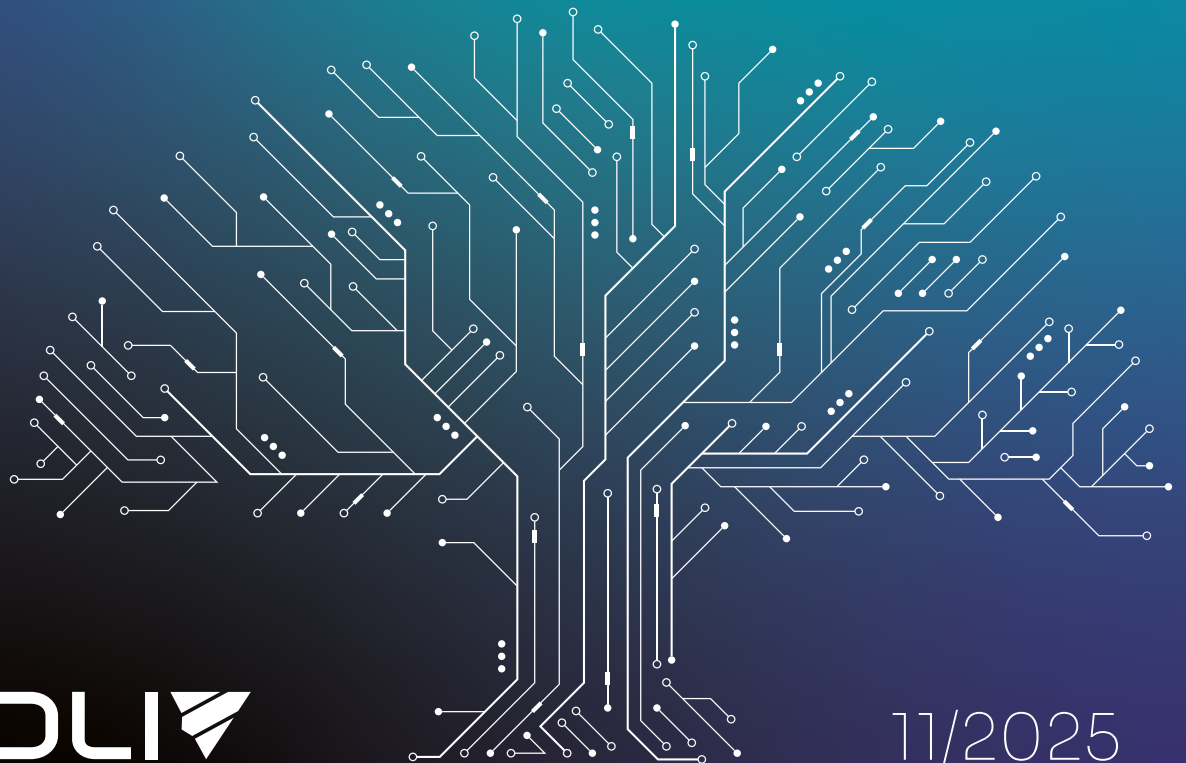


**FUTURE  
STARTS  
ABOVE**



# Assessment of the Aerospace Industry on the EU Deforestation Regulation (EUDR)



## Assessment of the Aerospace Industry on the EU Deforestation Regulation (EUDR)

The European aerospace industry expressly supports the EU's goal of stopping global deforestation and recognizes the importance of the EU Deforestation Regulation (EUDR) for sustainable supply chains. At the same time, the sector raises serious concerns about the current scope and implementation timeline. Due to the complex, safety-critical, and globally interconnected nature of aerospace supply chains, essential requirements – especially traceability and geolocation obligations – are currently not technically or organizationally feasible. The industry welcomes the postponement of the regulation's applicability to **30 December 2026** and calls for a **24-month transitional period** from the date the regulation officially takes effect. Furthermore, the sector supports limiting due diligence obligations to the **first market operator** to enable practical implementation of the EUDR without jeopardizing operational safety. In this context, the **obligation to pass on the reference number along the supply chain** should also be removed, as it creates unnecessary administrative burdens and provides no real relief for either industry or the EU's TRACES system.

More details can be found in the following table.

| Topic/EU Commission Proposal (EUDR)                                                                                                      | Position of the Industry (esp. Aerospace)                                                | Status (Compliance)                                                                                  | Comment/Industry Proposal for Improvement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Objective: Prevent deforestation through due diligence obligations for raw materials (e.g., rubber, wood). Application from 30 Dec 2025. | Support for the goal, but criticism of unrealistic schedule for safety-critical sectors. | Partially met<br> | The postponement of the application date to 30 December 2026 is expressly welcomed. Addition/new to Regulation 2023/1115, Article 38: 4) From the date this Regulation officially takes effect pursuant to paragraph 2, a transitional period of 24 months shall apply during which no administrative sanctions, fines, or comparable measures may be initiated against operators for violations of this Regulation. During this period, customs measures such as rejection or seizure of goods under this Regulation shall also be suspended. |
| Traceability (Geolocation obligation)                                                                                                    | Not practicable for complex, globally tiered supply chains.                              | Not met<br>       | Limit due diligence obligations to the "first market operator" (EU importer) only; no obligation for downstream actors.                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Topic/EU Commission Proposal (EUDR)                               | Position of the Industry (esp. Aerospace)                                                                                  | Status (Compliance)                                                                                  | Comment/Industry Proposal for Improvement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Obligation to pass on the reference number along the supply chain | Rejection of the forwarding obligation by downstream operators.                                                            | Not met<br>         | The forwarding obligation causes significant additional effort, leads to a proliferation of references on shipping documents, and offers no real relief. Companies will still file DDS requests via EU TRACES to consolidate references, meaning the system will not be relieved.                                                                                                                                                                                                                                                    |
| Scope (all operators, including intra-EU trade)                   | Demand for limitation to EU importers only – intra-EU trade should be excluded.                                            | Partially met<br>   | Legal establishment of the “First Market Operator” principle, with clear distinction of intra-EU transactions.<br><br>Amendment/addition to Article 4, Regulation 2023/1115: (1a) For the purposes of this Regulation, the term “operator” refers exclusively to the economic operator who first imports or places relevant products on the Union market. Downstream operators who further process, resell, distribute, export, or otherwise use the relevant products are not subject to due diligence obligations under Article 8. |
| De minimis threshold/ threshold value                             | Request for a de minimis clause (e.g., shipments < €200) to relieve small consignments.                                    | Not met<br>       | Introduction of a financial or quantity-based threshold to reduce bureaucratic burden.                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Exemptions for SMEs & safety-critical sectors                     | Aerospace calls for sector-specific exemptions (e.g., for aircraft components, rubber).                                    | Not met<br>       | Creation of exemption or transitional provisions for aerospace, defense, and SMEs.                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| IT & control systems (TRACES, benchmarking)                       | Lack of functionality, no testing with relevant industries.                                                                | Not met<br>       | Introduction of a testing and transition phase for TRACES involving the aerospace sector; establishment of training and support structures.                                                                                                                                                                                                                                                                                                                                                                                          |
| Legal certainty & implementation status                           | Uncertainty due to absence of legally binding postponement (only political announcement).                                  | Partially met<br> | A 24-month transitional period from the date of application of the Regulation, along with clarification of sanctions and transition rules.                                                                                                                                                                                                                                                                                                                                                                                           |
| Material differentiation                                          | Aerospace calls for risk-based prioritization – focus on primary processors of raw materials with high deforestation risk. | Not met<br>       | Introduction of risk-based differentiation (e.g., natural rubber ≠ highly processed components)                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## About the aerospace industry

The German aerospace industry, represented by the BDLI e.V., is an integral part of the European aerospace industry. As a key strategic industry, the sector plays a decisive role in the technological and economic sovereignty of the European Union. It promotes economic growth, technological innovation and international connectivity. In Germany alone, the industry contributes significantly to GDP with over 120,000 employees and an annual turnover of over 52 billion euros.

Over the decades, Europe has worked together with industry, member states and the European Union to achieve a leading position in the aerospace industry. This must be maintained and further expanded in the face of international competition. In view of far-reaching technological, political and industrial changes, this requires sustained investment in research and innovation.

### German Aerospace Industries Association

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