

European & International Booksellers Federation

Statement on the EU Deforestation Regulation (EUDR)

EIBF supports the goals of the EU Regulation on Deforestation-Free Products [EU/2023/1115](#) (EUDR), however, we regret to note that it represents a largely disproportionate administrative burden for an industry that does not contribute to global deforestation. Books were not included in the Commission's original proposal, and therefore no impact assessment was made for our industry. Currently, the EUDR – designed without taking into account the functioning of our sector, nor the position of bookshops as downstream operators – weigh heavily on booksellers and risk negative impact on cultural diversity and citizens' access to knowledge and information.

1. Books represent a low-risk, high-quality product supply chain

Books are already sustainable: a majority are printed in Europe on FSC-certified paper or imported from low-risk countries, and the industry has developed robust supply chains of high-quality products. Therefore, the sector anticipates that **the sole impact of the EUDR on the book supply chain will be the introduction of increased administrative burdens for all actors.**

2. EUDR does not account for the complexity of the book value chain

Books are not like other commodities: they are vehicles for information, with vast democratic and cultural value. Each copy of a book consists of multiple different types of paper (pages, binding, cover etc.) and each type of paper can be a mix of multiple different kinds of pulp, as well as recycled paper mass. Because of this, and the fact that multiple editions of a given title are in circulation under the same ISBN code simultaneously, Traces, and the reporting framework of Due Diligence Statements (DDS), would force businesses in the book sector to disproportionate “over-reporting,” as each entry has to reference the DDS of all editions of a given book.

3. The administrative burden of non-EU import is disproportionate and will impact Europeans' access to information and cultural diversity

All EU markets that have a high presence of English literature, with supply chains from the UK and USA will be disproportionately impacted by the EUDR. In addition, foreign language and academic bookshops, (often SMEs or micro-companies) who import books for students, libraries or universities, will face insurmountable administrative burdens, with some being forced to close. Consequently, European libraries and universities, many of which rely on bookshops for the supply of books, will also be impacted. Thus, the EUDR brings a massively negative impact on literary diversity, as well as to European citizens' access to books, culture, knowledge and information.

Amid declining literacy rates, increasing disinformation and polarisation, European legislation must support the green transition of the book ecosystem and its mission to promote reading and access to books, not introduce regulations that do not justly consider the reality of the industry.

Our ask:

To safeguard European bookshops and European citizens' access to literature, knowledge and cultural diversity, we ask to realign the EUDR with the Commission's original 2021 proposal, which rightly excluded printed products, such as books, from Annex I of the regulation.