TYRE INDUSTRY COMMENTS ON THE EUDR EC AMENDMENT PROPOSAL

Executive summary

The European tyre industry supports the EU Deforestation Regulation (EUDR) and its objective of preventing deforestation linked to products placed on the European market. The objective is right and urgent, and the sector has invested heavily to comply.

The European tyre industry has consistently asked for **no delay** in the enforcement of the EUDR and called for **real simplification** — meaning **no transfer of DDS along the value chain**.

The new Commission proposal fails to deliver this. It instead risks **setting back implementation efforts and distorting competition** in the tyre sector — just weeks before the Regulation enters into force.

Tyres Europe urges policymakers to reject the proposal in its current form, amend it to deliver true simplification, and adopt the delegated act amending Annex I immediately.

The simplification that was and is needed by the European Tyre Industry

Limit the due diligence obligation — including the creation and retention of the DDS — to **the operator placing for the first time the natural rubber or tyre on the EU market, with no obligation to transfer or retransmit DDS numbers downstream.**

Once due diligence has been completed at first placing on the market, the product should be considered EUDR-compliant for the rest of its life cycle.

Enforcement should focus on customs and upstream operators, while downstream actors would only retain basic supplier–customer records for inspection, without handling DDS documentation.

In parallel, the delegated act should be adopted to provide legal certainty for R&D/testing tyres and for retreaded tyres.

Why our request is rational and proportionate.

1. **All natural rubber used in tyres placed on the EU market is imported.**

The most effective and proportionate enforcement point is at customs, before products circulate.

2. **Transferring DDSs does not make enforcement more effective.**

It creates a massive documentation flow across actors in the value chain — many of them SMEs — without generating information that improves the detection of non-compliance. It increases cost and risk of errors, not enforcement success.

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If each intermediary mixes shipments, re-issues or passes on DDS numbers, a single tyre delivered to the final shop could be associated with hundreds of thousands references. This makes checks virtually impossible, not easier.

Authorities may think that downstream DDS data transmission equals traceability, but this is not the case for the tyre industry. The only reliable way to ensure compliance is at first placing on the EU market, supported by robust upstream due diligence and customs checks.

Delegated act amending Annex I is indispensable and must be adopted

Legal certainty is urgently needed regarding cases that are currently only addressed in FAQs or guidance:

- **Tyres used for R&D and testing** must be excluded from the scope of the Regulation to protect innovation.
- **Retreaded and used tyres** must be legally excluded to support circularity and align with the EUDR's proportionality principle.

Publishing the delegated act now is essential to avoid legal ambiguity for a crucial sector in the circular economy, the possibility for test tyres to continue feeding R&D and unnecessary compliance redesign.

What the proposal does instead

The proposal introduces confusion through the notion of a "grace period," without clarity on how this impacts customs checks or enforcement sequencing, including whether fines could be introduced retroactively by competent authorities.

It also **changes the definition of the first placer on the market**, making the **importer of natural rubber** — and not also the tyre manufacturer — the responsible operator for filing of DDSs. As a result, tyre manufacturers would have to **submit natural rubber DDSs, and manage, store and transmit all the references downstream**. Down the value chain, operators mix tyres from different manufacturers, brands, shipments, as segregation along the value chain is not feasible. These identifiers would then have to be stored, managed and retransmitted by distributors, retailers, fleets and workshops — mostly SMEs without the EU Commission assessing the impact on existing systems or capacity to do so.

In practice, this means that a **single EU-made tyre could be linked to thousands (or even millions) of DDS identifiers by the time it arrives to a shop**, each representing a batch of natural rubber that somehow got mixed with the original tyre in the process.

This approach does not simplify compliance — it **multiplies the complexity**, adds uncertainty to the actual possibility to implement it with the necessary IT tools to be completely redesigned, with certain huge administrative costs to the most fragile players in the market. **This approach also creates a market distortion whereby imported tyres (which have only one DDS for the finished product) would be administratively easier to handle than EU-made tyres.**

The Commission considers this a technical adjustment, but in reality it **sets the clock back by around 18 months**, effectively returning the EUDR to the uncertainty of its early design phase.

Finally, the proposal was presented **without an impact assessment** on the commodities and industries in scope.

Consequences for readiness and compliance efforts

The European tyre industry has invested heavily to comply with the EUDR as adopted. Over the past year, companies have developed digital systems, contractual procedures and traceability processes to meet the Regulation's requirements as they currently stand.

The Commission's amendment proposal fundamentally disrupts these preparations, altering the operational architecture on which all compliance systems were built.

This is not a minor technical adjustment — it effectively **resets the implementation clock to months ago**.

The IT solutions, supplier declarations and data flows that were designed for a single DDS per product now must be redesigned to accommodate the multiplication of identifiers. This shift invalidates almost the entire work already done and forces companies to restart compliance planning only weeks before the implementation.

As a result, **overall readiness across the tyre supply chain will deteriorate**, not because of lack of effort, but because the **rules of the game have been changed few weeks before its application**.

What was achievable under the current EUDR framework may become technically impossible under the proposed one. The sector's prior investments in compliance are at risk of being wasted, and the credibility of enforcement timelines weakened.

Call to action

Tyres Europe invites EU policymakers to:

1. **Reject the proposal if unchanged.** As drafted, it seriously undermines compliance readiness, does not deliver simplification, and shifts disproportionate burdens onto downstream actors, mainly SMEs in the tyre supply chain with no possibility to manage a tsunami of references for each tyre. For our sector, this is not simplification — it is further complication a few weeks before implementation.

2. **Amend the proposal** to introduce real simplification by **deleting the obligation to pass DDS identifiers down the value chain** (Articles 4(7) and 5(5)).

3. **Adopt and publish the delegated act amending Annex I immediately** to secure legal certainty for innovation (testing and R&D tyres) and circularity (retreaded and used tyres).

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