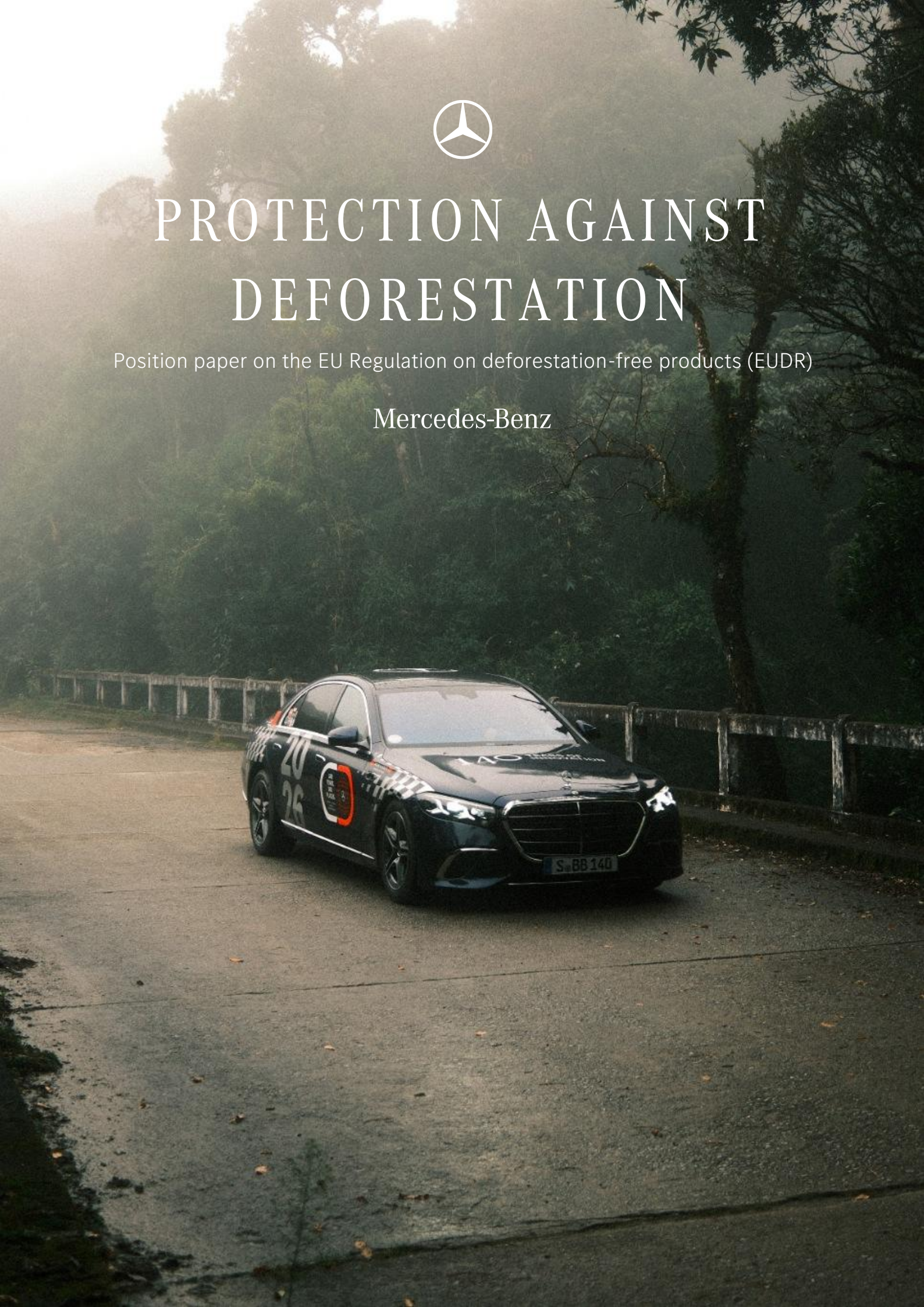
PROTECTION AGAINST DEFORESTATION

Position paper on the EU Regulation on deforestation-free products (EUDR)

Mercedes-Benz



Commitment to effective protection against deforestation through a forward-looking and practicable EU Regulation on deforestation-free products (EUDR)

Mercedes-Benz supports the global goal of protecting and preserving biodiversity. Combating deforestation and forest degradation is an essential part of this goal. Mercedes-Benz therefore shares the European Union's concern to address these challenges. The EU Regulation on deforestation-free products (EUDR) is a regulatory step towards pursuing these environmental goals. As a globally operating automotive manufacturer, we support the goal of deforestation-free supply chains and the implementation of the EUDR. Although many implementation challenges have already been addressed, further clarifications on selected aspects would help to ensure a uniform and practical application of the Regulation.

The automotive industry works with highly complex and multi-layered supply chains. Compliance with the EUDR must be ensured within these networks. Mercedes-Benz supports the overarching goals of the EUDR and advocates an implementation framework that combines effective environmental protection with practical and proportionate compliance requirements that are pragmatic in application. To ensure effective implementation of the Regulation's goals, we advocate a workable and risk-based approach to due diligence obligations.

In addition, companies are expected to demonstrate that they have taken all appropriate and proportionate measures to identify and address deforestation risks. This poses a challenge, particularly in complex global supply chains, as companies have to rely on information provided by upstream actors.

An efficient and coherent legal framework should ensure consistency with existing due diligence legislation and minimise unnecessary administrative burden. This would enable European manufacturers to deploy resources for concrete environmental and due diligence obligations while at the same time securing their competitiveness on the global market.

Mercedes-Benz remains committed to the goals of the EUDR to combat deforestation. To ensure effective and efficient application, we consider it useful to make further clarifications and practical improvements in this initial phase of application. We support measures that increase legal certainty, simplify compliance and promote a uniform and practicable framework. Looking ahead, all considerations regarding the scope of the Regulation should be based on practical implementation experience.