

What is the EUDR?

The EU Regulation 2023/1115 on Deforestation-Free Products (EUDR), which entered into force on 29 June 2023, aims to ensure that certain products sold on or exported from the EU do not contribute to global deforestation or forest degradation. This regulation is part of the EU's broader environmental strategy and is especially relevant for industries working with products derived from:



Coffee



Cocoa



Products of bovine origin



Wood



Palm Oil



Soy



Rubber

Key Requirements

As of the respective deadlines, it will be prohibited to place products on the EU market or export them unless the following conditions are met:

Deforestation-Free Origin



Products must come from land that has not been subject to deforestation after 31 December 2020. For wood-based products, this includes avoiding forest degradation due to unsustainable logging practices.

Compliance with Local Laws

Products must comply with all applicable laws of the country of production, including those related to land use, labor rights, and indigenous rights.



Due Diligence Statement



Operators must submit a due diligence statement confirming that:

- The risk of deforestation is negligible;
- The product is legally produced;
- The origin of the raw materials can be traced with geo-coordinates of the production area. This requirement is particularly critical and may require close collaboration with upstream suppliers and mills.

Who must comply?



Operators

Entities placing affected products on the EU market or exporting them from the EU. They must perform full due diligence.



Trades

Entities that sell these products within the EU (e.g. distributors, retailers). Larger traders must maintain documentation and ensure traceability; smaller ones have limited obligations.

Deadlines for Compliance

30 December 2025

Large companies (both operators and trades) must comply.



30 June 2026

Micro and small enterprises benefit from an extended transition period.

What actions are needed?

1

Explain to your clients that they should start engaging with their suppliers (especially printers, paper manufacturers) to confirm that they can provide the necessary documentation and geolocation information.

2

Requesting FSC or PEFC-certified materials, where possible, as a proxy for compliance.

3

Establishing internal procedures for collecting, storing, and reviewing due diligence data.



4

Checking product NC codes against the official EUDR Annex I – please check the [file attached](#) at page 40.

Due Diligence Process

Once the relevance of the product has been verified, the actual due diligence process begins, which consists of three mandatory sub-phases:

1.Information Collection

The operator must collect, organize, and retain for at least 5 years a series of detailed information for each relevant product.

2.Risk Assessment

After collecting all the information, the operator must assess the risk that the product does not comply with Article 3 of the regulation.

3.Risk Mitigation

If the risk is greater than zero, the operator must take concrete measures to reduce it to a negligible or zero level before proceeding.

Once the process is completed and it is determined that the risk of non-compliance is negligible or zero, the operator must submit an official due diligence statement to the authorities. This statement, must be retained for at least 5 years. By submitting it, the operator assumes full responsibility for the product's compliance with the EUDR regulation.

Due diligence declaration

It must include:

