Information on the EU-Deforestation Regulation (EUDR)

(November 9, 2026)

An element of the European Commission's Green Deal is the effort to counteract global deforestation. To this end, the European Union adopted the EU Deforestation Regulation (EUDR) at the end of 2022. With its publication in the Official Journal, EU Regulation (EU) 2023/1115 entered into force on June 29, 2023, and will replace the previously applicable European Timber Regulation (EUTR) after a transition period.

The EUDR imposes specific due diligence obligations on economic operators in the supply chains for the product groups coffee, cocoa, palm oil, soy, beef, rubber, and wood, as well as products derived from them. These include compliance with the legal requirements in the countries of production, as well as requirements relating to environmental aspects (deforestation and forest degradation) and human rights. Exemptions apply to packaging and products made of paper, cardboard, and carton for which no virgin fibers are used in production (i.e., products made exclusively from recycled paper).

The EUDR applies to the aforementioned products when they are placed on the EU market, as well as to their export to third countries. The requirements for establishing appropriate due diligence systems and procedures must be fulfilled by EU companies 18 months after the regulation enters into force (24 months for small and micro-enterprises), i.e., from December 30, 2024 (or June 30, 2025, respectively).

The delayed application start for small and micro-enterprises applies to all EUDR product groups except for wood products. Therefore, within the supply chain for relevant wood products (so-called EUTR products), the due diligence obligations must be fulfilled by all companies – regardless of company size – starting from December 30, 2024.

Following an initial postponement of the start date of application, the European Commission responded to European and international criticism from politics and industry by extending the implementation deadline by a further twelve months (Regulation (EU) 2025/2650 of the European Parliament and of the Council of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders).[1]

As a result, the regulation will enter into force for large and medium-sized companies in December 2026 and for micro and small enterprises in June 2027 (note: for participants in the wood supply chain, the end of the transition period is uniformly December 30, 2026, without exception).

[1] You can access the updated FAQ and the guidance on the current status of the EUDR on the BLE website: https://www.ble.de/DE/Themen/Wald-Holz/Entwaldungsfreie-Produkte/FAQ-Leitlinien_EU/FAQ-Leitlinien_EU-Kommission.html

Further changes relate to key obligations of operators, downstream operators, and traders. These changes are intended to significantly reduce administrative burdens and ensure reliable preparation for the implementation of the EUDR.

As a result of the amending regulation to the EU Deforestation Regulation, there is no longer a legal obligation to pass on reference numbers throughout the **entire** supply chain. This requirement is now limited solely to the **first** operator placing the product on the market.

The operator (=first placer on the market) is the company that places the product on the market for the first time (e.g., a forestry operation or an importer into the EU). The first placer on the market is required to submit a due diligence statement (with simplified rules for micro or small primary producers) and must provide the first downstream operator or trader with the reference number of the due diligence statement or, where applicable, the identification number assigned to the product. From this first downstream operator onward, there is no further obligation to pass on the reference number or identification number.

All downstream operators or traders must collect and store for five years the name, registered trade name or registered trademark, postal address, email address, and, if available, the website address of the operators, downstream operators, or traders who supplied them with the relevant products. The same applies to the same information for their customers, if these are downstream operators or traders. All downstream operators or traders that are not SMEs must additionally register in the information system.
Furthermore, substantiated concerns regarding a product's compliance with the EUDR and its lawful marketability - such as those raised by third parties or a supplier - must be identified in a timely manner and addressed appropriately. This should be taken into account as part of the company's risk management. For example, by establishing a compliance system that documents the procedure for addressing substantiated concerns.

Furthermore, the downstream operator or trader must, when the supplier is an upstream operator (=first placer on the market), collect and store for five years the reference numbers of the due diligence statement or the identification numbers assigned to the product.

Registration and the submission of the due diligence statement are to be submitted through https://eudr.webcloud.ec.europa.eu/tracesnt/login.

A non-binding test environment is available for the transition period: https://acceptance.eudr.webcloud.ec.europa.eu/tracesnt/login.

Registration in the EUDR electronic information system TRACES may only be carried out by a legal representative or a person authorized to act on behalf of the company.

In the future, inspections by the competent authorities will explicitly cover first placers on the market, downstream operators, and traders.

Summary:

- All companies in the paper-processing industry must collect information about their suppliers and customers and store it for five years. As part of company's risk management, clear procedures must be established for handling substantiated concerns. Non-SME companies must additionally register in the information system.

- If paper and board is purchased within the EU and the raw material used for it is not imported from outside the EU, the paper-processing company will not receive a reference number/identification number and therefore cannot pass a reference number/identification number on to its customer.

- A paper-processing company receives a reference number/identification number as the first downstream operator and must store it for five years only if the supplier imported the raw material used from outside the EU. There is no further transmission of the reference number within the supply chain.

- A paper-processing company is required to submit only a due diligence statement in the information system (simplified rules for micro or small primary producers) if, as operator (=first placer on the market) in the EU, it imports the paper from a non-EU country.