Cepi Guidance on the EU Deforestation Regulation

Regulation (EU)1115/2023

June 2025

RENEWABLE
RECYCLED
RESPONSIBLE
EUROPEAN

Disclaimer: The purpose of this Cepi guidance document is to provide information on certain aspects of the EU Regulation on Deforestation-free Products Regulation (EU) 2023/1115, hereinafter referred to as "the Regulation", or "EUDR" based on the understanding and common practices of the European pulp and paper industry. This document should not be considered in isolation but used in conjunction with the Regulation and the official Guidance document and FAQs of the European Commission. This guidance document does not have any legal value.

Contents

1) Introduction 2
2) Objective of the Regulation and general obligations for operators and large traders 2
3) Relevant definitions 3
3.1) Deforestation and forest degradation 3
3.2) Legality 4
3.3) Operators and traders 5
4) Product scope 5
4.1) Clarification on recovered and recycled material 6
4.2) Clarification on packaging 6
4.3) Other relevant exemptions 7
5) Obligations depending on the size and position in the value chain. 8
5.1) Case 1: Operator placing for the first time the commodity or products on the EU market 8
5.2) Case 2: Non-SME downstream operator and non-SME trader 8
5.3) Case 3: SME downstream operator 9
5.4) Case 4: SME trader 9
6) Ascertaining the due diligence of the supplier 9
7) Country benchmarking 11
8) Entry into application and transitional period 12
9) Re-importing into the EU 13
10) Customs procedures and TARIC codes for import and export 14
11) Frequency of Due Diligence Statement submission 15
12) Allocation/matching of incoming DDS to outgoing DDS 16
12.1) Declaration in excess 16
12.2) Declaration based on siloes, yards or stack 16
13) Communicating reference and verification numbers via CSV Files 17

1) Introduction

The present guidance document has been developed by Cepi with the aim of presenting the common understanding of the pulp and paper industry of the EU Deforestation Regulation's obligations and to suggest robust yet efficient approaches to implement it across the pulp and paper value chain. As such, it is not a document of legal value. This guidance does not cover all aspects related to EUDR implementation but focuses on selected issues that are relevant to the pulp and paper industry. Therefore, it should not be read in isolation but in conjunction with the text of the Regulation[1], as well as the Commission's Guidance document[2] (hereinafter "EC Guidance") and FAQs, which at the time of writing are in their 4th iteration, dated 17 April 2025 (hereinafter, "FAQs")[3]. At the time of writing, some secondary legislation[4] (Delegated Act amending the Annex I of the regulation) is at proposal stage, and not yet in force.

2) Objective of the Regulation and general obligations for operators and large traders

The Regulation applies to companies that place relevant products on the EU market or export them from the EU market and to companies that trade ("make available") relevant products on the EU market (Article 1.1). The EUDR covers seven commodities (cattle, cocoa, coffee, oil palm, rubber, soya, wood) and some of their derived products, including pulp and paper products.

According to EUDR Article 3, relevant commodities and relevant products shall not be placed or made available on the market or exported, unless all the following conditions are fulfilled:

(a) they are **deforestation-free**. This means that the relevant products contain or are made from commodities that were produced on land that has not been subject to deforestation after 31 December 2020, and that the wood has been harvested from the forest without inducing forest degradation after 31 December 2020 (Art. 2.13).
(b) they have been produced in accordance with the **relevant legislation of the country of production**; and
(c) they are covered by a **due diligence statement**.

Due Diligence Statements (DDS) are created and submitted online via a dedicated platform, the TRACES system. The system is a registry that allows operators, traders and their representatives to make electronic DDS and submit them to the relevant authorities to show that their products do not cause deforestation[5].

---

[1] Available in all EU languages here.
[2] Commission Notice on the Guidance Document for Regulation (EU) 2023/1115 on Deforestation-Free Products. C(2025) 2485 final. Available here.
[3] Available here (4th edition).
[4] Commission implementing Regulation laying down rules for the application of Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards a list of countries that present a low or high risk of producing relevant commodities for which the relevant products do not comply with Article 3, point (a), available here, Commission Draft Delegated Regulation amending the scope of Regulation (EU) 2023/1115, available here.
[5] For more information about TRACES, including the user manual and access link, please consult the dedicated webpage of the Commission.

3) Relevant definitions

3.1) Deforestation and forest degradation

The definition of deforestation is: "*conversion of forest to agricultural use, whether human-induced or not*". (Art. 2.3). For more information on the definition of "agricultural use", please consult the EC Guidance, chapter 11, page 26 and following.

Forest degradation is defined as "*structural changes to forest cover, taking the form of the conversion of primary forests or naturally regenerating forests into plantation forests or into other wooded land and the conversion of primary forests into planted forests*" (Art. 2.7).

The definitions (Art. 2.8-12) are largely based on FAO Terms and References:

Primary forest	Naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed.
Naturally regenerating forest	Forest predominantly composed of trees established through natural regeneration; it includes forests for which it is not possible to distinguish whether planted or naturally regenerated; it includes forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity; it includes coppice from trees originally established through natural regeneration; and it includes naturally regenerated trees of introduced species.
Planted forest	Forest predominantly composed of trees established through planting and/or deliberate seeding provided that the planted or seeded trees are expected to constitute more than 50% of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.
Plantation forest	Planted forest that is intensively managed and meets, at planting and stand maturity, all the following criteria: one or two species, even age class, and regular spacing. It includes short rotation plantations for wood, fibre and energy, and excludes forests planted for protection or ecosystem restoration, as well as forests established through planting or seeding which at stand maturity resemble or will resemble naturally regenerating forests.
Other wooded land	Land not classified as 'forest' spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of 5 to 10%, or trees able to reach these thresholds in situ, or with a combined cover of shrubs, bushes and trees above 10%, excluding land that is predominantly under agricultural or urban land use.

For more information on how to ascertain that no degradation was carried out, please refer to **FAQs 4.5**, **4.6**, **4.7**, **4.8**, **4.9**. On the liability of operators (e.g., pulp or paper manufacturers) for forest degradation that happens after the submission of the DDS, see **FAQ 4.8:**

"*The relevant products would not be compliant with the Regulation if they were sourced from an area where harvesting activities induced forest degradation in the period prior to submitting a due diligence statement.*

In submitting the due diligence statement, an operator assumes responsibility for the due diligence process and the compliance of the relevant products with Art. 3 a) and b). In this process the operator should take into account all relevant information and data, including for the risk factors set out in Art. 10.

A breach of the due diligence obligations could be found, for example, if the risk assessment part of the due diligence has not been properly conducted, because relevant information or specified criteria were overlooked, including post-harvesting plans for the plot of land.

Where the due diligence was found not to have been properly conducted, any downstream operators or traders would not be able to rely on an existing due diligence statement for the relevant products.

In contrast, where due diligence was properly exercised at the time, and the relevant products were compliant when they were placed on the market, the compliant status of the relevant products – and those of derived products – will not change based on events that occur after the process a product has been placed on the market (or exported) that could not have been identified as a potential risk at the time of submitting a due diligence statement. Nor will this affect the compliance status of the operator."

3.2) Legality

The obligation to ensure the legality of the wood was the basic tenet of the EU Timber Regulation. This is still the case, although the concept of "relevant legislation of the country of production" has been expanded, see comparison table below (Art. 2.40). For more information about legality, please consult the EC Guidance, chapter 6, page 13.

Definition of "relevant legislation of the country of production"	
EU Timber Regulation	**EU Deforestation Regulation**
rights to harvest timber within legally gazetted boundaries	land use rights
payments for harvest rights and timber including duties related to timber harvesting	environmental protection
timber harvesting, including environmental and forest legislation including forest management and biodiversity conservation, where directly related to timber harvesting	forest-related Regulations including forest management and biodiversity conservation, where directly related to wood harvesting
third parties' legal rights concerning use and tenure that are affected by timber harvesting	third parties' rights
trade and customs, in so far as the forest sector is concerned	labour rights
	human rights protected under international law
	the principle of free, prior and informed consent, including as set out in the United Nations Declaration on the Rights of Indigenous Peoples
	tax, anti-corruption, trade and customs Regulations

3.3) Operators and traders

Under Article 2.15 of the Regulation an operator is a natural or legal person who places relevant products on the market or exports them in the course of a commercial activity. “Placing on the market” means the first making available of a relevant commodity or relevant product on the Union market.

Under Article 2.17, “trader” means any person in the supply chain other than the operator who, in the course of a commercial activity, makes relevant products available on the market. “Making available on the market” means any supply of a relevant product for distribution, consumption or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge.

Under Article 2.19, “in the course of a commercial activity” means for the purpose of processing, for distribution to commercial or non-commercial consumers, or for use in the business of the operator or trader itself.

The EC Guidance (chapter 2) clarifies that for relevant commodities or relevant products produced outside the EU, the person acting as the importer is always the operator.

In case of commodities grown or harvested in the EU, the operator is usually the person that first distributes or uses them in the course of commercial activity once they have been produced.

A person that transforms a relevant product into another relevant product (new HS code according to the level of digits defined in Annex I of the Regulation) and places it on or exports from the market is an operator further down the supply chain, or downstream operator.

FAQ 3.1.1 adds that a change in the Commodity Code (HS, CN or TARIC) of a product already placed on the market results in a company placing a derived product on the market being an operator only if the change affects the digits that are listed in Annex I.

For the pulp and paper sector, it's important to note that Annex I of the EUDR only lists the first two digits of HS codes for pulp and paper products of Combined Nomenclature Chapters 47, 48, and 49. This mean that a company transforming mechanical pulp (code 4701) into newsprint paper (code 4801) is considered an operator, because the first two digits of the code change. A company transforming kraftliner (code 4804) to produce corrugated board (code 4808) would be considered an operator, because the first two digits remain the same.

Operators and traders have different obligations, also depending on the size (see section 5). It is important to note that the same company may have different roles at the same time. For example, it may import wood from outside the EU and also buy it on the domestic market to produce and sell pulp. The company will be an operator when it imports wood from outside the EU and a downstream operator when it buys wood already on the EU market.

4) Product scope

Relevant products in the scope of the Regulation are listed in Annex I. They include all products of chapters 44, 47, 48 and 49 of the Combined Nomenclature, except for bamboo-based and recovered (waste and scrap) products.

Products outside those customs codes are exempted from the Regulation’s requirements. For example, importing fluff pulp would be subject to the Regulation’s obligations; converting pulp into products falling into code 9619 (sanitary towels and tampons, diapers, napkin liners) and placing them on the EU or exporting them does not fall in the scope of the Regulation; placing on the market or exporting products of code 4818 (e.g. toilet paper, cleaning tissues etc.) does fall in the scope and is subject to the Regulation’s obligations.

4.1) Clarification on recovered and recycled material

Operators and traders have to comply with EUDR obligations for all the products they place on the market, with the exception of recovered and recycled material.

Annex I on the scope of relevant commodities reads as follows:

"*Except for by-products of a manufacturing process, where that process involved material that was not waste as defined in Article 3, point (1), of Directive 2008/98/EC, this Regulation does not apply to goods if they are produced entirely from material that has completed its lifecycle and would otherwise have been discarded as waste as defined in Article 3, point (1), of that Directive."*

Furthermore, Annex I lists the pulp and paper falling under the scope of the Regulation as follows:

"*Pulp and paper of Chapters 47 and 48 of the Combined Nomenclature, with the exception of bamboo-based and recovered (waste and scrap) products*".

Annex I of the Regulation, plus the Commission's **FAQ 2.8** make clear that for both post- and pre-consumer waste material the obligations of the Regulation do not apply. Specifically for pulp and paper, any "recovered (waste and scrap) products" are explicitly excluded from the scope of the Regulation, as well as bamboo-based products.

This is the case for paper for recycling discarded at households and retailers, but also for off-cuts from printshops or shavings from converting plants. The printer's waste or converting scrap has completed its lifecycle and would otherwise have been discarded as waste.

This also applies to scraps that are sent to another mill specialised in recycling or using recovered material as raw material. When sending scraps to a recycling mill, the operator (i.e., the paper manufacturer) should not submit a DDS in the TRACES system, and the recycling mill does not have to conduct the due diligence on the material received.

If the operator (i.e., the paper manufacturer) makes a claim that the material used is a mix of virgin and recovered or recycled fibres, then the operator only needs to have an EUDR-compliant due diligence system in place for the virgin fibres. Specific obligations depend on the size and position of the company in the supply chain (see section 5). When placing the paper on the market, the non-SME operator should submit a DDS, declaring the total weight of the product placed on the market (see **FAQ 7.22**). In their DDS the reference to the DDS of the supplier of virgin fibres should be made (see section 5).

Scraps that are repulped in the same manufacturing mill (known as mill broke) are not considered as waste, therefore their use does not count as recycling. If the mill broke is immediately repulped, it will come from the same batches of pulp that are being used to produce that reel of paper and therefore will be included in the DDS referred to in the DDS for that batch of production. For more information on allocation of incoming and outgoing DDS, see section 12.

4.2) Clarification on packaging

The EC Guidance (chapter 7) clarifies the status of articles under the HS code 4819, namely: "Cartons, boxes, cases, bags and other packing containers, of paper, paperboard, cellulose wadding or webs of cellulose fibres; box files, letter trays, and similar articles, of paper or paperboard of a kind used in offices, shops or the like".

If any of the above articles are placed on the market or exported as products in their own right rather than as packing for another product, they are covered by the Regulation and therefore the EUDR obligations apply.

If packing material, as classified under HS code 4819, is presented with goods inside and is used to "support, protect or carry" another product, it is not covered by the Regulation.

See also **FAQ 2.5**:

"Packaging materials used exclusively as packaging material to support, protect or carry another product placed on the EU market is not a relevant product within the meaning of Annex I of the Regulation, regardless of the HS code under which they fall. Whether the packaging material is listed on the invoice alongside the carried product is irrelevant; it is rather decisive whether the packaging would be classified jointly or separately in an import or export scenario (see rule 5b) of the General rules for the interpretation of the Combined Nomenclature). According to the rule 5b), packing materials and packing containers presented with the goods therein shall be classified with the goods if they are of a kind normally used for packing such goods. Where packaging is or would be classified jointly with the carried product, it can be considered to be used exclusively as packaging material to support, protect or carry another product placed or made available on the EU market or exported from it."

In concrete terms, the company manufacturing or selling packaging products under code 4819 and placing them on the market in their own right (that is, as empty packaging) is within the scope of the Regulation as an operator or trader. The company's obligations depend on the position in the value chain or the size (see section 5).

Companies that buy packaging to "support, protect or carry" their products, are not subject to the obligations of the Regulation, unless the product they place on the market is in scope. For example, a company placing on the market a chocolate bar wrapped in paper packaging is responsible for the due diligence on the cocoa, not on the paper packaging. This also means that the brand owner (i.e. the chocolate bar manufacturer) buying packaging for its own product should not ask the packaging manufacturer for the reference numbers of their DDS, nor is the packaging producer obliged to provide them such information. The packaging producer only must submit the DDS to the TRACES system so that the Competent Authority (not the client) can check the compliance with the Regulation.

It is worth noting that in the case where a manufacturer buys empty packaging or packaging material from outside the EU to fill it with their products, it will be considered an importer, and therefore a first operator. In this case the manufacturer will have to comply with the obligations of operators placing products on the market for the first time (see section 5.1).

4.3) Other relevant exemptions

Written letters and other items of correspondence, and samples sent for testing, analysing or for commercial purposes are excluded from the scope of the Regulation. See **FAQ 2.13** and **2.14**. In a draft Delegated Act put forward by the Commission, it is proposed that user manuals, information leaflets, catalogues, marketing materials as well as labels accompanying other products are also falling under this exemption unless they are placed or made available on the market or exported in their own right. See **FAQ 2.5.**

Please note however that at the time of writing the draft Delegated Act proposing the exclusion of correspondence items, samples and other articles from the scope of the Regulation is not yet in force.

5) Obligations depending on the size and position in the value chain.

The general due diligence rules for operators and large traders are detailed in Article 4. Obligations vary depending on whether companies are small and medium-sized enterprises (SMEs) or not, and on their position in the supply chain.

Operators place relevant commodities or products on the EU market for the first time. Downstream operators are those who place on the market or export relevant products listed in Annex I whose components or ingredients (all of them) have previously been subject to due diligence under EUDR and have been the object of a DDS submission.

5.1) Case 1: Operator placing for the first time the commodity or products on the EU market

The commodity or product is not covered by a previous DDS (as in the case of placing wood for the first time on the market or importing pulp from non-EU Countries). In this case the same obligations apply for both SME and non-SMEs. The company:

- Performs the full due diligence (Art. 4.1). This means information collection (Art. 9), risk assessment (Art. 10) and risk mitigation (Art. 11). If the wood is coming from a low-risk country (see section 7), the due diligence can be simplified and omit the risk assessment and mitigation.
- Submits to the TRACES system the DDS (Art. 4.2).
- Has the obligation to communicate necessary information to its customer (if the customer is in the scope of the Regulation) to demonstrate that due diligence was exercised and that no or only a negligible risk was found, including the reference numbers of the DDS associated with the commodity or products (Art. 4.7). **FAQ 7.15** clarifies that *"Art. 4.7 does not entail a legal obligation to share geolocation information along the supply chain, as ascertaining that due diligence was exercised upstream*".
- Keeps record of its DDSs for five years (Art. 4.3).
- Reviews annually its due diligence system (Art.12.2) and keeps the due diligence documentation for five years (Art. 12.5).
- Only if non-SME: publicly reports annually on its due diligence system (Art.12.3).
- Assumes the responsibility of compliance with Art. 3 for what he places on the market.

5.2) Case 2: Non-SME downstream operator and non-SME trader

The operator buys and processes wood or intermediate products (e.g. pulp, paper) that are already on the EU market and have already been covered by a DDS by the supplier. The large trader (e.g. a company that only buy and sells pulp without reprocessing) has the same obligations of a non-SME downstream operator. The company:

- Receives from the supplier the DDS reference number and verification number associated to the commodity or product placed on the market.
- Ascertains that the supplier has conducted the due diligence (Art. 4.9). For more information on this obligation, see section 6.
- Submits to the TRACES system the DDS (Art. 4.2) which includes the reference to the DDS of its supplier (Art. 4.9).
- Has the obligation to communicate necessary information to its customer (if the customer is in scope of the Regulation) to demonstrate that due diligence was exercised and that no or only a negligible risk was found, including the reference numbers of the due diligence statements associated to the commodity or products. **FAQ 7.15** clarifies that "*Art. 4.7 does not entail a legal obligation to share geolocation information along the supply chain, as ascertaining that due diligence was exercised upstream*".

- Keeps a record of its DDSs for five years (Art. 4.3).
- Annually reviews its due diligence system (Art. 12.2) and keeps the due diligence documentation for five years (Art. 12.5).
- Publicly reports annually about its due diligence system (Art. 12.3).
- Retains the responsibility for compliance with Art. 3 for what it places on the market.

For parts of relevant products that have not been subject to due diligence, non-SME operators should exercise due diligence in full (as in case 1).

5.3) Case 3: SME downstream operator

Same situation as above, but the company meets the EU SME criteria (available here). The company:

- Does not have to submit a DDS. See also **FAQ 3.5**.
- Obtains the DDS reference numbers and verification numbers associated to products and makes them available to competent authorities upon request. Although SMEs are not legally bound to transmit the DDS reference and verification numbers to the operators and traders to whom they supply the relevant products, in practice they are recommended to do so. Without those data, the non-SME client will not be able to complete its own DDS and place the product on the market or export it.
- Retains legal responsibility in the event of a breach of the Regulation (see FAQ 3.5 – this point however needs to be better understood).

5.4) Case 4: SME trader

The company meets EU SME criteria and buys and sells relevant products or commodities without any processing (e.g. wood trader). The company:

- Does not have to submit a DDS.
- Collects and keeps for five years from the date of making available on the market the following information: the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the operators or the traders who have supplied the relevant products to them, as well as the reference numbers of the due diligence statements associated to those products; the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the operators or the traders to whom they have supplied the relevant products.
- Makes the above-mentioned information available to competent authorities upon request.
- If the company obtains or is made aware of relevant new information, including substantiated concerns, indicating that a relevant product that they have made available on the market is at risk of non-compliance, the company immediately informs the national competent authority, as well as traders to whom they supplied the relevant product.

6) Ascertaining the due diligence of the supplier

In the EC Guidance (chapter 4b, page 12) it is clarified that downstream operators merely have to "ascertain" the due diligence of the supplier. This is further explained in **FAQ 3.4**. The FAQ outlines the essential steps (checking the validity of the DDS number of the supplier, making reference to it, having an up-to-date due diligence system in order to check the supplier) plus "possible further steps" based on supply-chain specific risks.

See **FAQ 3.4**:

"Ascertaining that due diligence has been exercised.

Downstream non-SME operators and non-SME traders ascertain that due diligence was exercised upstream by collecting the reference numbers and verification numbers of DDS submitted upstream and verifying the validity of the reference numbers. Downstream non-SME operators and non-SME traders then submit their own DDS, referencing all previous DDS received from their direct suppliers. (…)

Possible further steps

Given that in accordance with Art. 4(10) EUDR, non-SME operators and non-SME traders retain legal responsibility in the event of a breach of the Regulation, they could, based on the risks and particularities of their supply chains, choose to take further steps when ascertaining that due diligence has been carried out.
For example, non-SME operators and non-SME traders could check (…) the information provided in previous DDS regarding country of production, quantity and HS codes of declared products and – where available – geolocation and scientific names, in order to verify the completeness and plausibility of the information provided in light of the products they intend to place or make available on the EU market or export. Ascertaining that due diligence was properly carried out does not imply having to systematically check every single due diligence statement submitted by upstream suppliers.

Downstream non-SME operators or non-SME traders may also wish to collect and analyse information beyond what is contained in the Information System. Downstream non-SME operators or non-SME traders may, for instance, use the list of countries or parts thereof referred to in Art. 29(2) EUDR; consult the publicly available reports based on Art. 12(3) EUDR from non-SME upstream suppliers; consult the results of an audit conducted based on Art. 11(2)(b) EUDR; or request, on a voluntary basis, further information from their suppliers. In that manner, they could verify that their direct suppliers, where these are non-SMEs or upstream operators, have an operational and up-to-date due diligence system in place, including adequate and proportionate policies, controls, and procedures to mitigate and manage effectively the risks of non-compliance of relevant products, to ensure that due diligence is properly and regularly exercised."

Very importantly **FAQ 3.4** also clarifies that downstream non-SME operators who only have to ascertain that due diligence was exercised, do not have to collect information required by Art. 9.:

"No requirement to collect information.

As downstream non-SME operators and non-SME traders who only have to ascertain that due diligence was exercised, they do not have to collect information required by Art. 9 EUDR. DDS include a declaration that due diligence was exercised, implying that the information required by Art. 9 EUDR has been collected by the upstream operator (see point 5 in Annex II).

FAQ 3.6. further clarifies that "*even if the geolocation is not visible for downstream operators and traders, it is contained in their due diligence statements (as required by point 3 in Annex II) by referencing the upstream statements*."

In addition to the mandatory step of checking the validity of the DDS of the supplier, Cepi recommends performing an additional and voluntary standard risk assessment on the supplier before the delivery of the material, for example before the contract for annual or periodical supply is signed. The risk assessment may consider the country of harvest of the wood and the relative classification as low, standard or high risk, the risk of mixing of materials coming from different countries (especially if those have a different risk category), and the description of the due diligence system of the direct supplier.

As a second step, based on the risk assessment and only occasionally the company could do sample checks on the content of the DDS (e.g. checking 1% or 2% of the total number of DDS from suppliers). One should check the country/countries of origin of the wood (which will be visible in the DDS of the supplier) and verify if the information previously communicated by the supplier is consistent with the DDS.

In particular, if the country of harvest is standard or high-risk, the company could verify the geolocation information. In case of substantiated concerns raised with the relevant Competent Authority, or in case the operator receives information about potential risk of non-compliance of the materials from a certain area, the operator should conduct the full due diligence even if the country of origin is classified as low risk.

It should be noted that the geolocation information may not be visible in the DDS of the supplier in the Information System (see **FAQ 3.6**). In case of a sample check, the company could ask the supplier to provide the geolocation information outside of the Information System. However, it is not necessary to submit the company's own DDS, nor is it recommended to collect geolocation data from suppliers systematically, but only in case of sample checks and on the basis of a risk assessment, to reduce the administrative burden along the entire value chain.

7) Country benchmarking

A benchmarking system has been developed by the Commission to classify countries or regions according to risk of deforestation and degradation: standard (by default), low and high (Art. 29).

Operators who ascertain that the wood they use has been harvested in low-risk countries can perform a simplified due diligence. This means that first operators still have to collect relevant information that the commodities and products are deforestation-free and legal, including geolocation coordinates of plots of land, but do not need to assess and mitigate risks. The operators still need to assess that there is a negligible risk of circumvention or of mixing with products of unknown origin or coming from standard and high-risk countries. In that case full due diligence must be carried out (Art. 13).

Simplified due diligence does not apply if the operator has received a substantiated concern that the relevant products could be non-compliant.

Member States' authorities are required to perform minimum levels of inspections depending on the level of the risk (9% of operators for high-risk countries, 3% for standard-risk and 1% for low-risk).

All countries are considered standard risk unless they are classified as "low" or "high" in the Commission implementing Regulation laying down rules for the application of the Deforestation Regulation (available here).

The list may also be updated in the coming years, based on newest FAO data on deforestation.

Low risk countries: Afghanistan, Albania, Algeria, Andorra, Antigua and Barbuda, Armenia, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belgium, Bhutan, Bosnia and Herzegovina, Brunei Darussalam, Bulgaria, Burundi, Cabo Verde, Canada, Central African Republic, Chile, China, Comoros, Congo, Costa Rica, Croatia, Cuba, Cyprus, Czechia, Denmark, Djibouti, Dominica, Dominican Republic, Egypt, Estonia, Eswatini, Fiji, Finland, France, Gabon, Georgia, Germany, Ghana, Greece, Grenada, Guyana, Hungary, Iceland, India, Iran (Islamic Republic of), Iraq, Ireland, Italy, Jamaica, Japan, Jordan, Kazakhstan, Kenya, Kiribati, Kuwait, Kyrgyzstan, Lao People's Democratic Republic, Latvia, Lebanon, Lesotho, Libya, Liechtenstein, Lithuania, Luxembourg, Madagascar, Maldives, Mali, Malta, Marshall Islands, Mauritius, Micronesia (Federated States of), Monaco, Mongolia, Montenegro, Morocco, Nauru, Nepal, Netherlands (Kingdom of the), New Zealand, North Macedonia, Norway, Oman, Palau, Palestine, Papua New Guinea, Philippines, Poland, Portugal, Qatar, Republic of Korea, Republic of Moldova, Romania, Rwanda, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, San Marino, Sao Tome and Principe, Saudi Arabia, Serbia, Seychelles, Singapore, Slovakia, Slovenia, Solomon Island, South Africa, South Sudan, Spain, Sri Lanka, Suriname, Sweden, Switzerland, Syrian Arab Republic, Tajikistan, Thailand, Timor-Leste, Togo, Tonga, Trinidad and Tobago, Tunisia, Türkiye, Turkmenistan, Tuvalu, Ukraine, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United States of America, Uruguay, Uzbekistan, Vanuatu, Vietnam, Yemen.

High risk countries: Belarus, Democratic People's Republic of Korea, Myanmar, Russian Federation.

8) Entry into application and transitional period

The EUDR entered into force on **29 June 2023**. Most obligations on operators and traders, as well as on competent authorities including those in Articles 3 to 13, Articles 16 to 24, Articles 26, 31, and 32, apply from **30 December 2025**.

For operators that were established as micro-undertakings or small undertakings by 31 December 2020 (in accordance with Article 3.1 or 3.2 of Directive 2013/34/EU, respectively) the same obligations apply from **30 June 2026**, except with regard to the products covered in the Annex of the EU Timber Regulation (Regulation EU 995/2010).

This means that in the forest-based value chain (with the exclusion of printed products under Chapter 49 of the Combined Nomenclature, not previously covered by the EU Timber Regulation (EUTR)) the entry into application of EUDR is **30 December 2025** irrespective of the size of the company.

The transitional period runs between the entry into force of the Regulation (29 June 2023) and the entry into application (30 December 2025).

Timber and timber products produced before 29 June 2023 and placed on the market after 30 December 2025 still fall under the scope of the EUTR (Art. 37.2).

The EC Guidance (chapter 3, page 8) clarifies that, for timber and timber products produced from 29 June 2023 until 30 December 2025 and:

- placed on the EU market before 30 December 2025, such products and their derived products must comply with the rules of the EUTR; if the derived products are not covered by the Annex of the EUTR, those products would be exempted from EUTR and EUDR.
- placed on the EU market from 30 December 2025, such products and their derived products, must comply with the rules of the EUDR.

Chapter 3, Q1 (page 9) of the EC Guidance further clarifies the status of paper products placed on the EU market from 30 December 2025 but manufactured from timber that was harvested and placed on the market during the transitional period: in such cases the harvested timber and the products manufactured from such timber must comply with EUTR. They do not need a Due Diligence Statement, as this requirement applies to products in scope of EUDR.

It follows that it is important for operators to keep record and evidence of the date of placing on the market of the wood and derived products (e.g. pulp) to be able to justify why certain products placed on the market after December 2025 are not accompanied by a DDS and are EUTR-compliant only. See also **FAQ 9.2** on what documents are accepted as evidence of 'placing on the market':

- In case of imported products, the customs declaration of relevant commodities or products is accepted.
- For EU produced goods, operators should keep documentation relating to the production date, invoices, or other documentation related to the production date of the commodity.
- To prove the date of placing on the market, operators should keep contracts between the parties, product order documents, shipment accompanying documents about the delivery to the customer including CMRs, bill of lading, delivery notes and any other documents showing evidence that goods are transferred between the two parties.

For products falling in the transitional period, no DDS needs to be submitted in the Information System. In case of export or re-import of a product which was initially placed on the EU market during the transitional period (itself or in the form of an upstream relevant product), a "conventional DDS reference number", meaning a universal reference number that can be entered in the customs declaration in cases of products falling in the transitional period, will be communicated by the Commission that can be used in the customs declaration submitted for export or re-import (**FAQ 5.4; FAQs 9.1.-9.6**).

When operators and traders mix commodities placed on the EU market during the transitional period with newer (post-transitional period) stocks, only the information relevant to commodities newly placed on the EU market should be part of the DDS as this stock is subject to the due diligence exercise.

It is important to note that this arrangement does not apply to products that were already placed on non-EU markets during the transition time. For example, if pulp or paper is imported from a non-EU market after 30 December 2025, it will have to be accompanied by a DDS, even if the timber was originally placed on the non-EU market during the transition period.

9) Re-importing into the EU

FAQ 5.4 addresses the question of re-importing a product into the EU, including the problem of transition time. It states that "*where an operator re-imports (i.e., releases for free circulation) a product that was previously exported from the EU market and places it under the customs procedure 'release for free circulation', it is considered a "downstream operator*".

This clarification has important consequences as it means that the re-importer does not have to fulfil all the obligations of first importers (see Case 1 above), but only the limited obligations of downstream operators, which are dependent on the size of the re-importer (see Case 2 and 3 above).

Concretely, if the re-importer is an SME operator, he does not have to carry out due diligence nor file a DDS; at customs he will have to provide the reference numbers received from its suppliers in the customs declaration.

If the re-importer is a non-SME, he will have to file a DDS before releasing the product for free circulation; in its DDS he will have to provide the reference to the upstream DDSs (the latest one will be the one submitted at the point of export from the EU). He will also have to ascertain that the due diligence was exercised upstream by his direct supplier.

It is worth noting that at the point of export (unless export happens during the transition time, see section 4, or the exporter is an SME), the EU exporter will have to file a DDS. The non-EU intermediary will have to keep a record of the relevant DDS reference and verification numbers and pass them to the EU re-importer.

As an alternative, the non-EU intermediary can access the TRACES system and file its own DDS. This is only possible when the non-EU company imports a product on behalf of its EU customer. In this case, the company can access the TRACES system. To register, it has to provide its valid Economic Operators Registration and Identification (EORI) number issued by an EU Member State or the United Kingdom in respect of Northern Ireland when registering in TRACES (see **FAQ 7.3**).

The above applies equally where an imported product contains relevant products that were previously placed on the EU market and have been subject to due diligence (example: pulp exported from the EU to a third country to manufacture paper, and the paper is subsequently released for free circulation in the EU).

For parts of relevant products that have not been subject to due diligence, operators must exercise due diligence and submit a DDS. For example, if the non-EU paper producer uses pulp from different EU and non-EU suppliers, the full due diligence for the pulp of non-EU origin will have to be done at the point of import of the paper.

In this case, the importer will have to submit a DDS. This will contain the characteristics of the final product (paper) such as Harmonised System code, product description, and quantity (weight and volume).

For the purpose of the DDS, net mass refers to the weight of the entire product itself, excluding any packaging materials (see **FAQ 7.22**).

In addition, the importer will have to provide the geolocation data and scientific names of trees relevant to the batches of pulp coming from non-EU sources, and the reference numbers of DDS for the batches of pulp coming from EU sources.

10) Customs procedures and TARIC codes for import and export

According to the EUDR, the obligation to submit a DDS applies at the time of lodging the customs declaration for releasing goods for free circulation (hereinafter referred to as "import") or the export declaration. If the obligations are not met, import or export is prohibited.

Distinct TARIC measures, one for import and the other for export, have been created in TARIC. A new TARIC document code C716 corresponding to the DDS has been created. The declarant has to use this code to declare to the national customs authorities that he/she is in possession of the required DDS.

Different document codes have also been created to cover exemptions from EUDR, e.g. for the import of goods that are produced entirely from recycled material. In particular, a new TARIC document code Y133 has been created to cover the exemption defined in the second explanatory paragraph in Annex I, stipulating that the Regulation does not apply to goods if they are produced entirely from material that has completed its lifecycle and would otherwise have been discarded as waste as defined in Article 3, point (1) of Directive 2008/98/EC.

A new TARIC document code C717 is also created, corresponding to the derogation for SME operators as defined in Art. 4.8 of the EUDR. C717 is declared in customs by SME operators when they are not required to exercise due diligence for relevant products contained in or made from relevant products that have already been subject to due diligence, and for which a DDS has already been submitted.

A new TARIC document code Y132 has been created to cover Article 1.2 of the EUDR where it is stated that the Regulation does not apply to the relevant products listed in Annex I produced before 29 June 2023.

A new TARIC document code Y129 has been created to cover the "ex" codes in Annex I of the EUDR. This corresponds to the declaration of a nomenclature code that covers more products than those falling within the scope of the EUDR. In such case, the declarant must have the possibility to state that the import is not concerned by the regulation, although the declared product is classified under a nomenclature code impacted by the EUDR. This would apply, for example, if the operator imports paper products made of non-wooden fibres.

For more information, see the notice "**TARIC data created for Regulation (EU) 2023/1115 on deforestation and forest degradation**", available here.

11) Frequency of Due Diligence Statement submission

FAQ 5.19 contains relevant clarifications on the frequency of submission of DDS.

A DDS can cover multiple physical batches/shipments of multiple different relevant products. The essential condition is that the quantity of all relevant products placed on, made available on the EU, or exported must be covered by a DDS and that statement must be submitted prior to the placing on the market or export.

Once the quantity of products covered by the DDS has been fully placed on the market or exported, a new statement must be filed for additional quantities by the same operator.

The FAQ also makes clear that a DDS should not cover shipments/batches over a period longer than one year from the time of submission of the statement. This is because according to Article 12, the operators shall review their due diligence system once a year. Therefore, a due diligence statement should not cover shipments/batches over a period longer than one year from the time of submission of the statement. In addition, a longer time period could lead to difficulties in demonstrating the correspondence between declared products and products actually (intended to be) placed on the market or exported.

The FAQ also states that an operator may issue a DDS covering a product that has not been manufactured yet; however, since at the point of submission of the DDS the operator assumes responsibility for compliance with Article 3, the commodity (wood) should already have been harvested and should have undergone due diligence.

For example, in the case of declaring an amount of pulp in a DDS, while the trees should have already been harvested at the time of DDS submission for the pulp, it is not necessary that the pulp has already been manufactured.

As such, there is no fixed frequency of DDS submissions; this should be decided by each company and mill based on the specificities of its own logistics and operations. The important principle is that all the incoming relevant material (wood, chips, pulp paper) is covered by a DDS, and all outgoing products are also covered by a DDS, even in multiple batches.

For example, a pulp mill may conduct a one-year contract with a forest owner for the supply of wood. The forest owner can issue a single DDS covering all the plots that are planned for harvest during that year, even though the consignment of the wood will happen at different times of the year. However, if the forest owner supplies wood from harvesting sites that were not declared in the first DDS (for example, because a natural disturbance occurred and some salvage logging was performed in a plot not originally declared), the forest owner will have to issue and share with the customer of the wood a new DDS.

It is recommended to include in the contract of purchase of wood with the forest owner a clause to ensure that the wood purchaser does not have any responsibility for any action by the forest owner that violates the requirement of the Regulation (e.g. inducing forest degradation, or consigning wood that is not covered by the original DDS) after the purchase of the wood.

Similarly, a paper mill may choose to submit a DDS for every paper reel or for larger batches of production, provided that all the incoming material that went into the batch of production is declared in the DDS, meaning that the DDS contains the reference to all the relevant suppliers of materials (for more information on this please see the section 12). The DDS may be submitted at the point of manufacturing or before shipping.

12) Allocation/matching of incoming DDS to outgoing DDS

As described before, each DDS submitted to the TRACES Information System must contain either the information about the location of the plots that were harvested (in case of first operator) or the reference numbers of the DDS of the relevant suppliers (in case of downstream operator). The Regulation is built on the principle of strict traceability, whereby operators need to collect the precise geolocation coordinates corresponding to the plots of land of production.

However, in case of pulp and paper production, such strict traceability based on physical segregation is not achievable. Given that mixing of raw materials occurs at different points of the supply chain, it is impossible to trace the wood fibres contained in the output (e.g. a reel of paper) to the precise locations of the harvested plots of lands.

In this case, some alternative methods are possible:

12.1) Declaration in excess

FAQ 1.18 states that it is possible to "declare in excess" the locations of origin (or reference the DDS of suppliers in excess), on condition that there is no mixing with commodities of unknown origin or non-compliant commodities. This means that the operator can provide geolocation coordinates for a limited number of plots of land higher than those where the commodities were produced. However, declaring all the potential plots of land that can be associated to a certain batch of pulp could result in a very high number of data points, especially because they accumulate over time. Moreover, if a single plot of land is found non-compliant, all the production output will also be non-compliant. Using the "declaration in excess" method and listing all the potential plots increases the risk that a small quantity of non-compliant material "contaminates" a very large production output (for example, spanning for more than one year). This method is therefore not recommended.

12.2) Declaration based on siloes, yards or stack

This method is described in **FAQ 1.17**.

When commodities or products are mixed into the same silo, stack, pile, tank, etc., and then some of those goods are placed on the EU market:

• The place of production declared should include the place of production of all goods that entered the silo/pile, etc. since it was last empty (and could therefore potentially be included in the shipment).

• If the silos/pile, etc. are not regularly emptied, the operator would need to declare the place of production of all goods that entered the silo during a period of time that ensures that commodities of unknown place of production are not mixed up in the process.

The first option normally does not apply to pulp production based on the use of wood from the woodyard and chip pile, since those are never fully emptied. It could, however, be adopted to paper production, on condition that the paper mill is able to identify the precise batches of pulp that went into the production of a corresponding quantity of paper, for example, if they are able to link a certain production of paper to a single consignment of pulp via their internal IT systems.

In case the yard/pile is never emptied, the FAQ recommends associating to the outgoing DDS all the incoming material (and corresponding DDS) that entered the yard/pile during a single period of time. The FAQ suggests declaring a minimum of 200% of the silo/pile/yard capacity, provided that the silo works in first-in first-out system. This, however, is only an example and should not be taken as a prescriptive rule. As long as the mill declares above 100% of the volume, there should be no gaps in the reporting and therefore no breach of EUDR obligations.

A similar method that can be used is based on timing. For example, for a certain period of paper production, the operator issues one single DDS. In the DDS, the operator declares the origin or links the DDS of the suppliers that consigned the material in the previous six months, provided that the volumes of input and output correspond based on the conversion rate applicable at that specific mill. For the choice of timing, it is recommended to align it with the average rotation time of the woodyard or warehouse.

A method combining the two above solutions can be used as follows. For a certain production batch of paper the average storage time of raw material (wood, chips, pulp) is taken to find the delivery date of raw materials used in that batch. All DDS references of deliveries of that date (plus and minus a few days of tolerance time) are collected and allocated to this batch of finished goods (paper).

This last method is applicable when raw materials continuously enter and leave the wood yard and there are no old piles of logs or chips being accumulated.

13) Communicating reference and verification numbers via CSV Files

As we have seen, the transfer of the reference and verification numbers between operators in the supply chain is essential to comply with EUDR obligations.

The Regulation does not prescribe any particular method for exchanging those data with the customers who are in scope of the Regulation. It is, however, recommended to exchange them in electronic format, so that it is easier to retrieve the numbers and use them in the DDS submission. DDS reference and verification numbers can also be printed on the relevant invoices.

To facilitate electronic reading of the reference numbers and automation within the companies' processes, it is recommended to use CSV files with the following standardised format:

Encoding (utf-8), column separator (;), decimal separator (,).

The following elements should be included: company name, company identifier number (e.g. VAT), company identifier type (VAT or other), supplier reference, customer reference, delivery date (or other relevant date agreed with the customer), HS heading, description of goods, net weight in kilogrammes (as required by the TRACES system), DDS reference number, DDS verification number.

Example:

Company Name	Company identifier number	Company identifier type	Supplier reference	Customer reference	Delivery date	HS heading	Description of goods	Net weight	DDS reference number	DDS verification number
Company XYZ	4568327-3	VAT	123456789	12345	2025-05-10	4403	Softwood	250000	25FI3OTIPO6519	MJQTFH15

The CVS encoding should be the following:

companyName;companyIdentifier;companyIdentifierType;companyInternalRef;date;hsHeading;desciptionOfGoods;referenceNumber;verificationNumber.

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also bio-chemicals for food and pharmaceuticals, bio-composites and bioenergy. We are a responsible industry: 85% of our raw materials are sourced from within the European Union, 92% of the water we use is returned in good condition to the environment. We are the world champion in recycling at the rate of 70.5% At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 25 billion value addition to the European economy and €5 billion investments annually. Through its 19 national associations, Cepi gathers 490 companies operating 870 mills across Europe and directly employing more than 180,000 people.

More information about our sustainability performance here.