

An aerial photograph of a dense forest with a narrow dirt path running vertically through the center. The image is overlaid with several bright green, angular, geometric lines that crisscross the frame, particularly on the left and right sides. The text 'THIS IS A' is centered above the word 'Cepinar' in a white, sans-serif font.

THIS IS A

Cepinar

7 May 2025

Cepi Updates on EUDR

Margherita Miceli, Forest Policy Manager

Agenda

15.00 Welcome address

Margherita Miceli, Forest Policy Manager, Cepi

- 15.05**
- Amendment to EUDR scope (Annex I)
 - Key updates in the new FAQs and Guidance on EUDR

15.35 Questions and Answers

Competition rules reminder

Before attending Capi meetings please ensure you read carefully the Guidelines for Compliance with EU Competition Rules



DOs:

- Supervision/procedure
- Recordkeeping
- Vigilance



DON'Ts:

- Pricing information
- Costs and production
- Market information
- Investment, divestment and future plans



A full copy of the guidelines is always available for our members in the meeting rooms or on Capi's Members Area → Resource Centre

Main obligation: **place** on the EU market / **export** from EU market products only if

they are
deforestation and
forest-
degradation free

they have been
produced in
accordance with
legislation of the
country of
production

they are covered by a
due diligence
statement (DDS)

 **Due diligence obligation** to ensure compliance

EUDR: new timeline after postponement

The Regulation entered into force on **29/06/2023**

December 2024

EC Information System is active

NB: there are now 2 systems: a “test” system for training and a legally valid one!

30 June 2025

Country classification in place

(low, standard, high risk)

30 December 2025

Obligations for **Competent Authorities** enter into application

Obligations for **non-Small and micro operators and traders** enter into application

30 June 2026

Obligations for **Small and Micro operators and traders** enter into application
(except for the timber sector)

EUDR implementation going forward

We have:

- ✓ Updated Guidance (April 2025)
- ✓ Updated FAQs (April 2025)
- ✓ Competent Authorities in most Member States
- ✓ Information System

We still miss:

- ❑ Country Benchmarking
- ❑ 3 Member States have not designated a competent Authorities yet (Greece, Malta, Poland)

Useful links

- Updated FAQs and Guidance
- Contact list of Competent Authorities
- Information System-related documents

All available here:

https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en

Amendment to Annex I

Amendment to Annex I via Delegated Act. Out of scope:

- waste, second-hand and used products
- samples of products and products used for examination, analysis, testing, or sent to the client for evaluation
- packing materials and containers when they are used to support, protect, or carry another product placed on the market and are presented with that product
- accessory materials, such as user manuals, leaflets, catalogues, and marketing materials accompanying another product
- items of correspondence



Draft Delegated Act available [here](#). **NB**: not yet approved!

Updated Guidance and FAQs

New information from updated Guidance and FAQs

Scope:
Clarification on
recycled paper

Scope:
Clarification on
packaging

Clarification of
role of
downstream
operators

Transition time
for EUTR
products

Re-importing
into the EU

Frequency of
DDSs

NB: FAQs and Guidance are not legally binding!

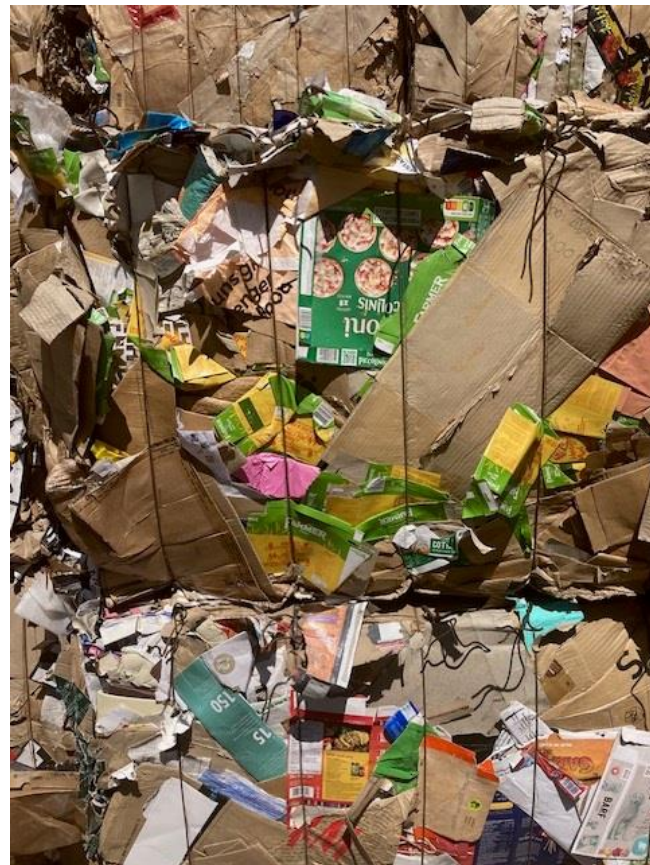
Scope: recycled paper (Annex I)

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**

(Annex I specifies: **waste and scraps**)

FAQ 2.8: exclusion applies to both post- and pre-consumer waste material

→ **however**, if there is mixing of non recycled/recovered fibers, DD obligations apply to the share of virgin material in the mix



Reminder on Packaging – see also FAQ 2.5

- Packaging under code 48 is covered by the Regulation (cartons, boxes, etc.)
- If packaging is placed on the market or exported as **a product in its own right** (i.e. **standalone/ empty packaging**), rather than as packaging for another product, **it is covered by the Regulation** and therefore due diligence requirements apply.

→ packaging producers have to comply with EUDR obligations

- If packaging is used to ‘support, protect or carry’ another product and is ‘presented with the product’, **it is not covered by the Regulation.**

→ Packaging users (incl. brand owners) are outside of the scope of EUDR



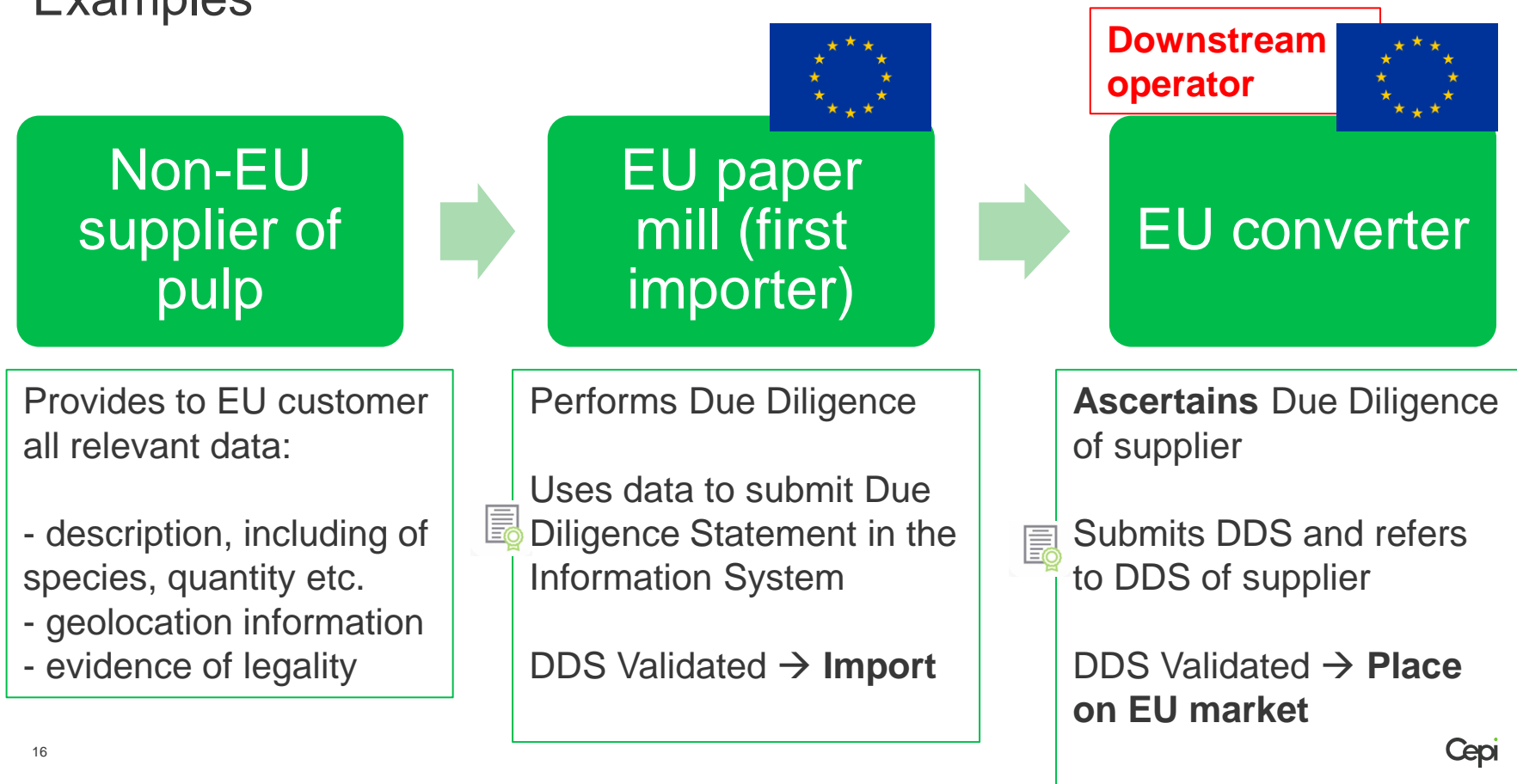
Obligations of downstream operators – FAQ 3.4

Who is a downstream operator?

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.



Examples



What does it mean to “ascertain”? FAQ 3.4

Key Obligations of downstream operators:

1. 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.**

2. Submit a due diligence statement (DDS) and refer to previous DDS

What does it mean to ascertain? FAQ 3.4

Possible further steps:

Given that 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:

- check the information provided in previous DDS regarding country of production (...) to verify the completeness and plausibility of the information
- use the country benchmarking;
- use the public report about Due Diligence of the supplier;
- use the results of audits
- request further information on a voluntary basis

Important clarification on transmission of information

FAQ 3.4:

downstream non-SME operators and non-SME traders do not have to collect information required by Art. 9 EUDR (including geolocation) but only ascertain that due diligence was exercised

FAQ 7.15:

Art. 4(7) EUDR does **not** entail a legal obligation to share geolocation information along the supply chain, as ascertaining that due diligence was exercised upstream does not necessarily imply checking every single DDS upstream.



NB: geolocation information may be hidden

Submission - Confirmation



By submitting this due diligence statement the operator confirms that due diligence according to Regulation 2023/1115 was carried out and that no or only a negligible risk was found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation.

☒ Check this box to allow the geolocation data of this DDS to be visible when referenced in another DDS

✓ Confirm & Sign

× Cancel

Joint statement with printers and publishers

Clarifying the role of geolocation data in EUDR compliance

March 2025

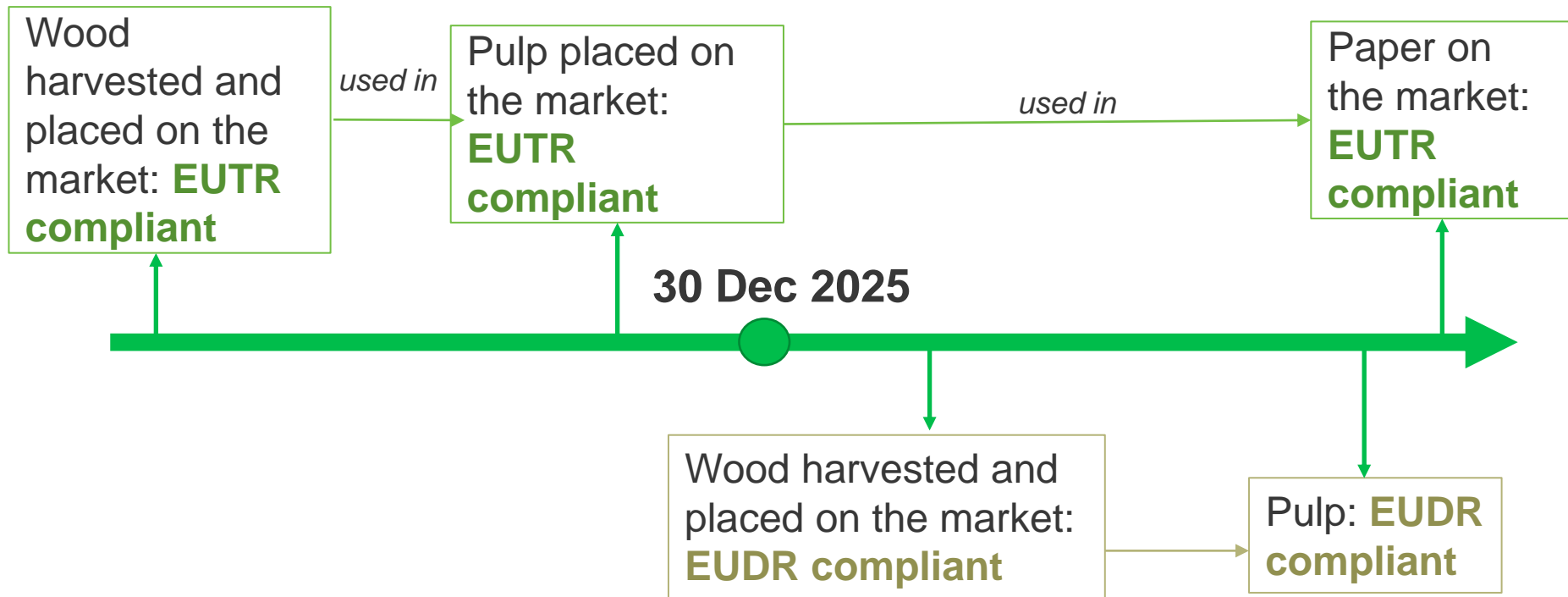
To ensure the best understanding for all actors in the pulp, paper and print value chain, it is necessary to address the misconceptions about the need for geolocation data to achieve compliance with the EU Deforestation Regulation (EUDR).

The EUDR requires geolocation data of the area where wood is harvested to be collected and made available to Competent Authorities before placing wood on the EU market for the first time or before importing wood or wood-based products into the EU. While this information is crucial for traceability, it is not expected to be automatically available or accessible to all actors along the value chain via the EUDR Information System, nor it is needed for downstream operators to be compliant with the Regulation.

Available here:

https://www.intergraf.eu/images/2025/pdf/PR_20250313_EUDR_Geolocation_Joint_Statement.pdf

Clarification on status of EUTR products and transition time



Clarification on status of EUTR products and transition time

Guidance

Q1: Are paper products which are placed on the market from 30 December 2025 but that are manufactured from timber that was harvested and placed on the market between 29 June 2023 and 30 December 2025 required to have a Due Diligence Statement?

harvested timber and the products manufactured from such timber must comply with **EUTR** - they do not need a Due Diligence Statement

→ Important to keep “adequate and verifiable evidence” that the wood used was harvested and placed on the EU market in the transition time or that the relevant product was placed on the market in the transition time (see **FAQ 9.2** for more info)

Clarification on status of EUTR products and transition time

→ **See 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
- EU **produced** goods: documentation relating to the production date, invoices, or other documentation related to the production date of the commodity
- **Date of placing on the market:** contracts between the parties, product order documents, shipment accompanying documents about the delivery to the customer including CMRs, bill of lading, delivery notes, air-way-bill, and any other documents showing evidence that goods are transferred between 2 parties

Clarification on status of EUTR products and transition time

- 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**” will be communicated by the Commission that can be used in the customs declaration submitted for export or re-import.
- In case of **mixing of stocks** (transition phase and post-transition), the DDS should cover only the post-transition material

Re-importing into the EU – FAQ 5.4



Where an operator re-import 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”

- If the re-importer is a non-SME, **already existing due diligence statements can help ascertain that due diligence was exercised upstream;**
- The non-SME re-importer needs to submit a DDS prior to re-importing and needs to provide the reference number received for its DDS when releasing products for free circulation.
- **Conventional DDS number** can be use in case of the re-import of a product which was initially placed on the market before December 2025

Frequency of DDS – FAQ 5.19

- A single DDS can cover multiple physical batches/shipments of multiple different relevant products
- Important that a DDS is submitted before placing on the market of the relevant quantity
- Once the quantity of products covered by DDS has been fully placed on the market or exported, a new statement must be filed

NEW: If a person does not know which products will be sold on the EU market, and which will be exported at the time of DDS submission, it is possible to declare all products with an “export” DDS and keep documentation demonstrating the corresponding quantities.

NEW: it is not necessary that the individual product that will be placed on the market has already been manufactured: for example, in the case of declaring wooden furniture in a DDS, while the trees should have already been harvested at the time of DDS submission for the furniture, it is not necessary that the furniture has already been manufactured”