

EUDR Quick Reference Guide

Your 5-Minute Reality Check | May 2026 edition · revised May 8

Everything you need to know about the EU Deforestation Regulation, in plain operational English. Covers the three operator roles, the First Operator decision tree, country risk classifications, the Information System (TRACES), the Annex I product list, free tools for compliance evidence, certification overlap, and the dates that matter between now and 2027.

What Is EUDR?

EU Regulation 2023/1115 — Proving your wood and other commodities did not cause deforestation after December 31, 2020. As amended by Reg (EU) 2025/2650 (Dec 2025) and supplemented by COM(2026) 191 final, Guidance C(2026) 3056 final, FAQ v5, and a draft Delegated Act on Annex I (consultation until 1 June 2026). Full source list on page 3.

Application: 30 Dec 2026 (large/medium operators, all timber-sector) · 30 Jun 2027 (non-timber micro/small). **Covers:** cattle, wood, cocoa, coffee, palm oil, rubber, soy and derived products (Annex I CN codes; Chapter 49 printed products exempt). **Penalty:** up to 4% of EU turnover + product confiscation + market bans + procurement exclusion. **System:** TRACES — staged reopening from June 2026 after Feb 2026 maintenance.

The Three Pillars You Must Prove

1. DEFORESTATION-FREE	2. LEGAL HARVEST	3. DUE DILIGENCE STATEMENT
No forest loss after December 31, 2020 Forest = >0.5 ha, >5m trees, >10% canopy (FAO definition, Art. 2)	Comply with ALL origin country laws (Art. 2(40)) Includes: land tenure, environmental, labour, tax, anti-corruption, FPIC where applicable	Submit BEFORE placing on market Via the Information System (TRACES). Geolocation + quantity + country + supplier info + signed declaration. Operators share the DDS reference number with direct downstream customers — verification numbers are requested only by non-SME downstream/traders on substantiated concerns.

How EUDR Works in Practice

The core text is settled. The Commission has confirmed it will not reopen the regulation. All ongoing simplification runs through guidance, FAQs, delegated acts, and implementing regulations.

Compliance costs are projected at **~€2.0 billion/year** across the EU, down from ~€8.1 billion/year as originally estimated — a roughly **75% reduction** the Commission attributes to cumulative simplification measures.

There are **three operator roles** in any EUDR supply chain:

Role	What they do	DDS burden
First Operator	Places product on EU market for first time. Includes EU forest owners harvesting and selling timber commercially , non-EU importers, mills processing imported logs, manufacturers using imported commodities.	Full DDS: geolocation, risk assessment, mitigation, signature. Micro/small primary operators in low-risk countries (all EU member states) may use the simplified one-off declaration with postal address instead of GPS.
Downstream Operator	Buys products already on EU market (wholesaler, distributor, converter using already-DDS'd inputs). The First Downstream Operator (buying directly from a First Operator) additionally collects and passes the DDS reference number down the chain.	Passive duty — no proactive investigation. Collect & retain DDS reference number; if none arrives, may presume in good faith that supplier is not an Operator/MSPO (FAQ 3.4(a), 3.5). SMEs are exempt from TRACES one-time registration and from substantiated-concern verification.
Trader	Re-sells without triggering operator status	SMEs: only collect & retain records. Non-SME traders: same as Downstream Operators (including TRACES registration and substantiated-concern verification).

Built-in simplifications:

- Single DDS for multiple shipments — “declaration in excess” — same supplier, plot, risk profile
- **Forest associations may submit DDS information on behalf of individual member forest owners** (May 4, 2026 package)
- **Micro/small primary operators in low-risk countries** — under 10 employees, under €2M turnover — may use a one-off simplified declaration with postal address instead of plot coordinates
- Legality evidence proportional to risk; voluntary grouping of DDS reference numbers in TRACES; updated EUDR Supply Chain Infographics (4th edition) on Commission's Green Forum

Quick Test: Are You a First Operator? (30 seconds, four questions)

Q1. Do you sell harvested wood (logs, sawn timber, firewood, woodchips, pulp) commercially?	YES → Go to Q2. NO → Not in scope as an operator. Standing trees alone are not a relevant product.
Q2. Did the wood come from outside the EU?	YES → You are a First Operator (importer). Full DDS at point of import. NO → Go to Q3.
Q3. Did you harvest the wood (yourself, employees, or contractor) and sell it on the EU market?	YES → You are a First Operator . If micro/small (under 10 employees, under €2M turnover), use the simplified declaration — postal address, one submission. NO → Go to Q4.
Q4. Did you sell standing trees to a logging contractor who then harvests and sells the logs?	YES → The logging contractor is the First Operator. Make sure your sale contract names them as responsible operator. NO → Likely a Downstream Operator or Trader. Keep DDS reference numbers from suppliers. No DDS submission needed.

Annex I — The Product Scope (Draft Delegated Act)

A Commission draft Delegated Act fine-tunes the list of products covered by EUDR. Public feedback is open until **1 June 2026** ahead of formal adoption.

Proposed ADDITIONS to scope	Proposed EXCLUSIONS from scope
<ul style="list-style-type: none"> Soluble (instant) coffee Certain palm-oil derivatives including soap containing palm oil <p><i>Both processed products where the commodity link to coffee or palm oil remains traceable.</i></p>	<ul style="list-style-type: none"> Leather, hides, and skins (beef stays in scope) Retreaded tyres Product samples Products used for testing, examination, or analysis Certain packing/packaging materials Used and second-hand products Marketing and information materials Items of correspondence Waste

Final adopted text could differ from the draft. The public consultation closes 1 June 2026, after which Parliament and Council scrutiny applies.

Country Risk Classifications

Every country is classified by the Commission into one of three risk tiers under **Implementing Regulation (EU) 2025/1093**. The classification drives inspection rates and the depth of due diligence required. The next benchmarking review is scheduled for after the regulation enters application — **no earlier than late 2027**.

Risk Level	Countries	Inspection	Due Diligence
HIGH	4 countries: Russia, Belarus, Myanmar, North Korea (also under EU/UN sanctions)	9% of operators	Full + enhanced scrutiny
STANDARD	~50 countries: Brazil, Indonesia, Malaysia, Argentina, Côte d'Ivoire, Colombia, Ethiopia, Peru, Mexico, others not listed as low or high	3% of operators	Full due diligence — risk assessment + mitigation
LOW	~140 countries incl. all EU Member States, US, UK, Canada, China, Japan, Australia, Vietnam	1% of operators	Simplified — geolocation still required; full DD if substantiated concern

Low-risk does NOT mean zero-effort. Geolocation and proof of legality are still required for low-risk countries. Any substantiated concern triggers full due diligence regardless of tier. High-risk countries also face UN/EU sanctions for EUDR-relevant commodities — Russian and Belarusian timber is effectively excluded from the EU market.

The Information System (TRACES)

SYSTEM STATUS: In maintenance since **16 February 2026** to integrate the December 2025 amendments. Staged reopening scheduled for **June 2026** — production and training environments together — with additional functionality (simplified declaration form, voluntary DDS grouping, updated APIs, downstream role configurations, contingency plan, national database integration) rolled out through summer 2026 ahead of the December 30, 2026 application date.

What to do during the outage: map your supply chain, collect plot-level geolocation data, decide your role (First Operator / Downstream / Trader), and confirm your suppliers will pass DDS reference numbers in writing.

Critical Dates: Your 2026–2027 Timeline

Date	Event
Now	Map supply chains, collect geolocation data, decide your operator role, prepare supplier contracts
Jun 1, 2026	Public consultation closes on draft Delegated Act amending Annex I (leather, soluble coffee, palm soap, and more)
June 2026	TRACES staged reopening — production and training environments together
Summer 2026	Additional TRACES functionality rolled out (DDS grouping, API enhancements, simplified declaration form)
Sep–Nov 2026	Recommended dry-run window — test real consignments, close data gaps, stabilise operations
Dec 30, 2026	APPLICATION DATE — large/medium operators, timber-sector micro/small, and products previously under EUTR (Reg 995/2010, repealed). Enforcement begins.
First half 2027	First real EUDR enforcement actions expected
Jun 30, 2027	Application date for non-timber micro/small primary operators
Late 2027+	First country risk classification review (using updated FAO Global Forest Resources Assessment data)

The GPS Challenge: Practical Benchmarks

What EUDR Requires	What Practitioners Report
Latitude/longitude coordinates for all plots: <ul style="list-style-type: none"> Polygon for plots >4 ha Single point for plots ≤4 ha 6 decimal places in guidance (~11 cm theoretical) 	<ul style="list-style-type: none"> Consumer GPS under canopy: 4–20 m error typical Professional GNSS without RTK: single-digit metre accuracy

Practical interpretation: Several national authorities (including Germany's BLE) emphasise practical implementation. Documenting "best available technology" and equipment specifications is emerging as accepted practice. This is a practitioner approach, not a formal regulatory relaxation.

Free Tools for EUDR Evidence

Not officially mandated, but widely used. The Regulation is not prescriptive on which tools operators use.

Tool	What It Does	Cost
Sentinel-2 imagery <i>scihub.copernicus.eu</i>	10 m resolution satellite imagery, 5-day revisit. Land cover verification.	Free
Google Earth Engine <i>Hansen forest change</i>	Global forest change. Open scripts. Deforestation monitoring vs. 2020 baseline.	Free
QGIS <i>qgis.org</i>	Open-source GIS for compliance reports with geolocation data.	Free
JRC GFC 2020 (v3) <i>forobs.jrc.ec.europa.eu/GFC</i>	EU-preferred reference baseline. 10 m resolution. Integrates Copernicus, ESA WorldCover, JRC TMF.	Free

FSC/PEFC Certification: A Head Start (Not Full Compliance)

If you have FSC or PEFC certification, you already cover significant ground: ✓ Legal harvest documentation ✓ Forest management plans ✓ Chain of custody tracking ✓ Risk assessments

✗ **Still needed:** plot-level GPS + satellite verification against 2020 baseline + DDS submission via TRACES. Practitioners often estimate certified operations cover roughly **70%** of EUDR requirements (industry rule of thumb, not an official figure).

Red Flags and Best Practice

Avoid	Do
<ul style="list-style-type: none">✗ Claiming GPS accuracy your equipment cannot deliver✗ Ignoring pre-2020 forest status verification✗ Mixing compliant and non-compliant products in the same shipment✗ Waiting for another delay (Commission is firm: no further delay planned)✗ Assuming "low-risk country" means zero documentation✗ Assuming you are not an operator just because you sell to a domestic processor✗ Assuming downstream = no obligations (you still need records)	<ul style="list-style-type: none">✓ Document GPS efforts with equipment specs and methodology✓ Use Sentinel-2 / Hansen / JRC GFC to support deforestation verification✓ Keep all records for at least 5 years✓ Prepare TRACES submissions now — be ready when the system reopens in June✓ Map your supply chain role: First Operator, Downstream Operator, or Trader✓ If micro/small in the EU: ask your forest association whether it will submit on your behalf✓ Require DDS reference numbers in supplier contracts

The Bottom Line

The framework is settled. The core text will not be reopened. The application date holds at **December 30, 2026**. Compliance costs project to roughly **€2.0 billion per year** across the EU once all simplification measures are in effect — about 75% below the original estimate.

The regulation is workable. Most summaries make it look harder than it is. Forest owners are most often First Operators — and the simplified declaration route makes that role manageable. Companies that build their internal data flow now will be fine. Companies still arguing about scope in November will not.

*Legal sources: EU Reg 2023/1115 | Reg (EU) 2025/2650 (OJ, 23 Dec 2025) | Commission Implementing Reg (EU) 2025/1093 | COM(2026) 191 final + Staff Working Document | EC press release IP/26/941 | Guidance Document C(2026) 3056 final | EUDR FAQ v5 | EUDR Supply Chain Infographics (4th ed.) | Draft Delegated Act on Annex I (consultation open until 1 June 2026) | EC Green Forum / TRACES system notices. **Analysis & commentary:** Mayer Brown | Linklaters | Slaughter and May | Taylor Wessing (BLE control process) | Reuters | Euronews | KPMG | Sourcemap | Wood Central. **Notes:** GPS accuracy figures are industry benchmarks from forestry GNSS literature, not figures from the Regulation. Cost estimates are Commission projections or practitioner approximations as cited. TRACES dates per Commission announcements and may shift. Some Annex I details remain under public consultation until 1 June 2026 and could change before final adoption.*

May 2026 edition · revised May 8 | ForestryBrief | European Forestry Pulse | forestrybrief.com