# EUDR STATEMENT on DEFORESTATION and FOREST DEGRADATION.

COMMITMENT – Trimco Group is committed to comply to the regulation on deforestation (EU Deforestation Regulation) EUDR Regulation (EU) **2023/1115** on deforestation and forest degradation.

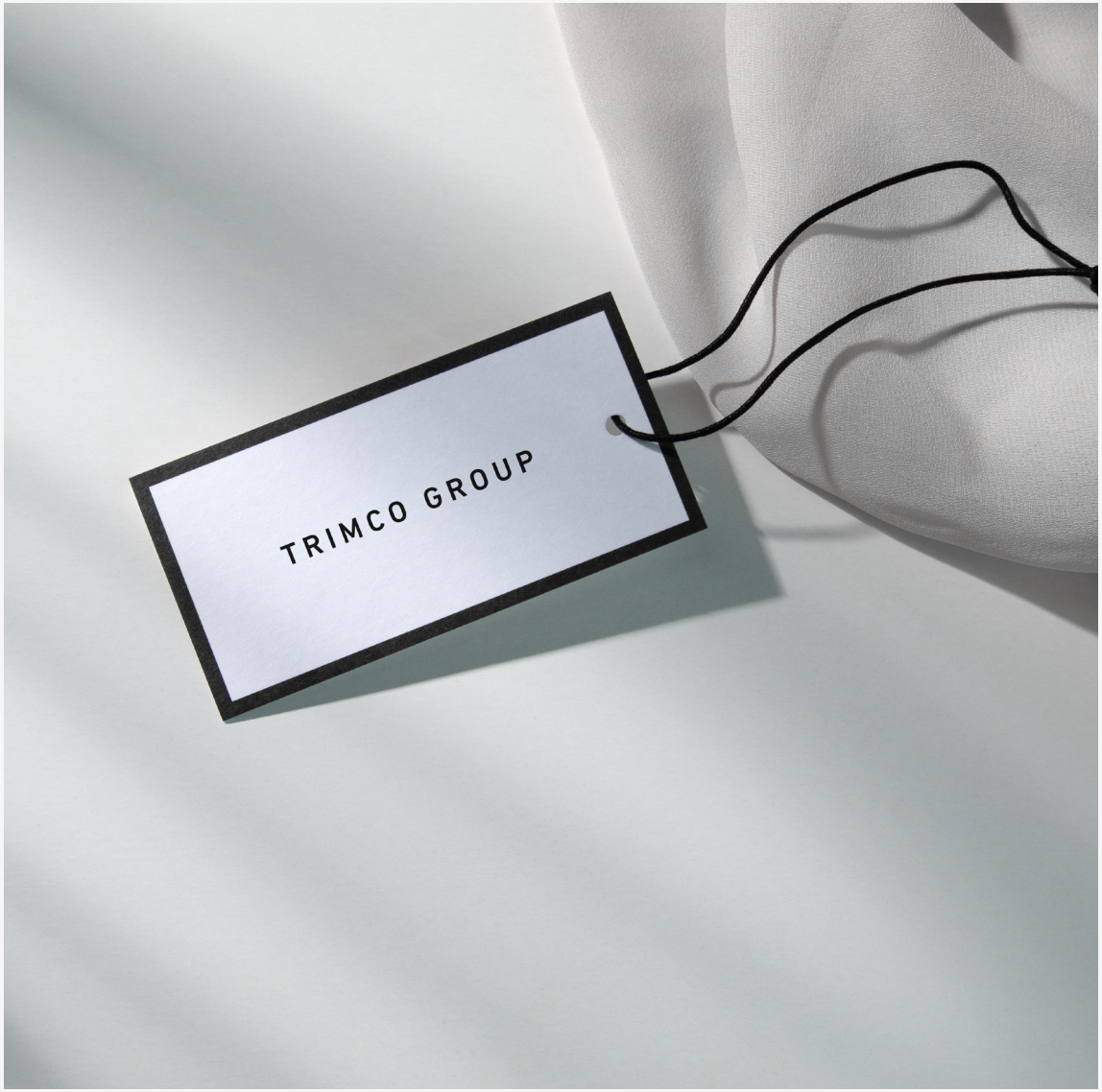
# 01 EUDR BACKGROUND.

On 29 June 2023, the Regulation on Deforestation-free Products (EUDR) entered into force.

The main driver of deforestation is the expansion of agricultural land linked to the production of commodities like cattle, wood, cocoa, soy, palm oil, coffee, rubber, and certain derived products covered by Annex I of the Regulation, such as leather, chocolate, tyres, or furniture.

As a major economy and consumer of these commodities linked to deforestation and forest degradation, the EU is partly responsible for this problem, and it wants to lead the way to solving it.

Under the Regulation, any operator or trader who places these commodities on the EU market, or exports from it, must be able to prove that the products do not originate from recently deforested land or have contributed to forest degradation.



# 02 REGULATORY UPDATES.

Trimco Group follows the evolving EUDR regulations closely, and we are committed to complying with the applicable EUDR regulations. We follow all regulatory updates and adjust our actions accordingly. The EUDR application date has been postponed twice, with the latest amendment confirming the revised implementation timeline. However, Trimco Group remains committed to following the EUDR requirements regardless of changing timelines.

Under Regulation (EU) 2025/2650, the EUDR will generally apply from 30 December 2026 for large and medium-sized operators, and from 30 June 2027 for micro and small operators, subject to specific exceptions. Trimco Group is a large and medium-size operator perform EUDR compliance accordingly.

Finished products placed on the EU market before 30 December 2026 do not need to comply with EUDR requirements, although applicable EU Timber Regulation (EUTR) obligations may still apply.






# 03 TRIMCO GROUP SCOPE.

Trimco Group's wood-derived products, including certain paper and paper-board products listed in Annex I of the EUDR, are within the scope of the Regulation, subject to applicable exclusions.

Finished goods – Paper products imported from outside the EU into Trimco Group's EU warehouse are subject to EUDR where their specific commodity codes fall within Annex I of the Regulation.

Rolls of blank labels, pre-printed brand labels, swingtags, label sheets, etc., sold as merchandise in their own right (to printers, co-packers, retailers) and imported separately into Trimco Group European warehouses in scope of EUDR regulation and the products listed in Annex I.

Tags or paper packaging presented with garments or footwear and used as an integral part of the goods or exclusively to support, protect or carry them are generally outside the scope of EUDR, provided they are not independently classified as relevant products. Garments and footwear are not subject to EUDR solely because they contain or are accompanied by paper labels, tags or packaging.

# 04 TRIMCO GROUP ACTION.

Trimco Group has mapped its products that are in and out of scope of the EUDR. The products within Trimco Group's portfolio that are in scope fall under HS codes 44, 48, and 49.

For products in scope, the first step is to actively transition the paper source from virgin paper or FSC™ Mix paper to FSC™ Recycled certified paper.

Products made from FSC Recycled certified paper are exempt from the EUDR and can be imported into the EU under the exemption code Y133.

For products in scope that cannot be transitioned to FSC Recycled certified paper, Trimco Group has ensured that the paper source has an available GeoJSON file and/or DDS from the paper supplier. These paper products can therefore be imported into the EU after December 2026 under HS codes 44, 48, and 49 with the relevant DDS registered in the EU TRACES system.

For products in scope that can neither be changed to FSC Recycled certified paper nor to a paper source with GeoJSON/DDS available, the customer will be contacted by Trimco Group to review alternative strategies for the items in question.

For all new product developments at Trimco Group, an assessment SOP has been implemented to ensure that all in-scope products will always have either the Y-code exemption or the required GeoJSON/DDS available before any product development for the EU market takes place.




**FSC™ CERTIFIED**
Trimco Group holds a multi-site FSC certification for both FSC Recycled 100% paper products as well as FSC Mix paper products:
FSC-STD-40-004 V3-1.

# 05 SOURCES.


/ European Commission – Regulation on Deforestation-free Products (EUDR)
/ Regulation (EU) 2023/1115 – EU Deforestation Regulation (Original Legislation)
/ Regulation (EU) 2025/2650 – EUDR Amendments, Simplification Measures and Revised Application Dates (December 2025)
/ Commission Simplification Review of the EU Deforestation Regulation – COM(2026)191 final (4 May 2026)
/ European Commission – EUDR Guidance Document (20 July 2026)
/ EUDR Supply Chain Infographics (5th Edition, 3 September 2026) – Publications Office of the EU
/ Commission Delegated Regulation (EU) 2026/2102 – Updated EUDR Annex I Product Scope (17 September 2026)
/ European Commission – EUDR Frequently Asked Questions (August 2026 publication)
/ European Commission – Product Scope and Digital Tools Implementation Update (13 July 2026)





**PLEASE CONTACT**
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