

EUDR Summit 2025 Q&A

This document has been compiled by LiveEO based on questions received during the EUDR Summit. The answers reflect LiveEO's understanding and interpretation of the EUDR Regulation as of the date of the event. For any additional questions or to get in touch with our team, please use our contact form at <https://www.live-eo.com/contact>.

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Session 1: Quo Vadis, ESG in Europe: EUDR, Omnibus, and the Regulatory Crossroads

Question: Does Coconut Charcoal fall within the scope of the EUDR, or will it be exempt?

Answer: The EUDR targets a defined list of commodities associated with deforestation and forest degradation. According to Annex I of Regulation (EU) 2023/1115, the regulated commodities are cattle, cocoa, coffee, oil palm, soya, wood, and rubber. Coconut is not listed, and coconut charcoal, derived from coconut shells, does not fall under the wood category or relevant HS codes. Therefore, coconut charcoal is currently exempt from the EUDR. However, the scope of the Regulation may expand in the future, so monitoring updates is advised.

Question: Is there an EUDR competent authority in Nigeria?

Answer: No, only EU Member States are required to appoint Competent Authorities under the EUDR. However, Nigeria has established a National Task Force (NTF) to coordinate EUDR preparedness, particularly in key sectors like cocoa, rubber, and timber. The NTF can support stakeholders in meeting EU requirements and maintaining market access.

Question: How do European formulators using natural rubber have to comply with EUDR requirements? How to get logged on to the Due Diligence database?

Answer: European formulators placing natural rubber or rubber-derived products on the EU market qualify as operators and must comply with full due diligence obligations. This includes submitting a Due Diligence Statement via TRACES NT. Access to TRACES requires EU Login credentials and EORI registration.

For a deep dive into rubber sector compliance, see [Mastering EUDR Rubber Compliance: A Comprehensive Guide](#).

Question: Will leather hides be excluded from the EUDR?

Answer: No, leather hides are included. Annex I of Regulation (EU) 2023/1115 lists cattle-derived products such as raw hides, skins, and bovine leather. If these are placed on or exported from the EU in commercial activity, they fall under EUDR obligations. Full compliance with traceability, legality, and deforestation-free requirements is required.

Question: We are a manufacturer of confectionery products. What level of detail should we go into in our reporting? Should a chocolate bar bought in a store also be covered?

Answer: If your chocolate products contain EUDR-listed commodities like cocoa or palm oil and you are the first to place them on the EU market or export them, you are an operator under the EUDR. You must submit a Due Diligence Statement (DDS) including geolocation, production date, legality, and risk assessment. Retail sales (e.g., store purchases) are not in scope unless you are placing or exporting the product. Reporting is ingredient-specific and tied to first placement or export, not end-user purchases.

To learn more about EUDR compliance for cocoa-based products, see [Navigating EUDR Compliance for Cocoa: A Guide](#).

Question: We are a timber producer. Our production often includes a mix of five suppliers with ten different geolocations. Which geolocation shall we key in? All 10?

Answer: You must declare all 10 geolocations. The EUDR requires full traceability and prohibits mixing of compliant and non-compliant or unknown sources. Every plot that contributed to the final product must be proven deforestation-free and legally sourced.

See [Navigating EUDR Compliance for Timber: A Guide](#) and [A Comprehensive Guide to Mastering Geolocation Data Collection](#) for more.

Question: We have 2–3 different countries of origin in the supply chain. How can we comply?

Answer: You must declare all countries of origin in your DDS. For each country, provide geolocation data and conduct separate risk assessments. Compliance obligations apply equally across all sources, and multiple origins increase documentation complexity but not the regulatory threshold.

For guidance on managing risk across multiple origins and deforestation-free verification, see [Achieving EUDR Compliance: A Guide to Deforestation Data Sources](#).

Question to the Competent Authority: How are Competent Authorities going to execute checks on entities? What are the main elements checked, and how will traceability be ensured for hard-to-trace items like posters or wooden stirrers?

Answer by LiveEO: Competent Authorities conduct checks using a risk-based approach, including document reviews, audits, physical inspections, and satellite verification of geolocation data. They verify DDS completeness, plot-level traceability, legality, and effective risk mitigation. Even for small or unusual items, traceability to the original plots is mandatory if they fall under regulated HS codes.

Question: Could you please share the slides?

Answer: All slides shared during the summit are available [\[here\]](#). Please refer to the follow-up email for download instructions.

Question to the Competent Authority: What is the CA's view on certification schemes like FSC and RSPO in supporting EUDR enforcement?

Answer by LiveEO: Certification schemes can support risk assessments if they meet EUDR criteria (e.g., deforestation-free, legality, traceability). However, they are not substitutes for full due diligence. Operators must still collect geolocation data, verify legality, and assess risk independently.

Question to the Competent Authority: There are rumours that the COM is considering not to classify countries into low/standard/high risk anymore, but to classify all countries as standard risk (due to the political discussions). What is your view?

Answer by LiveEO: The EUDR allows the Commission to classify countries as low-, standard-, or high-risk. Discussions under the Omnibus process suggest a move toward treating all countries as standard risk, which would require full due diligence for all operators. This change has not been confirmed but is under consideration. Currently, all countries are treated as standard risk by default.

Question: We are a tissue manufacturer in Africa exporting to Europe. I used my Greek trader's EORI in TRACES and now my activity says "import," not "export." Why?

Answer: Using your trader's EORI during TRACES registration causes the system to classify your profile as an EU-based importer. To fix this, register your own entity as an exporter or ensure your EU trader submits the DDS. Accurate role designation is crucial to determine legal responsibility for compliance.

Question: Is soy drink subject to reporting?

Answer: Yes, soy drink is subject to EUDR reporting if it contains soy, which is one of the seven regulated commodities under Annex I of Regulation (EU) 2023/1115. Most soy-based beverages fall under CN code 2202, and if this code is listed in Annex I, a Due Diligence Statement (DDS) must be submitted before the product is placed on or exported from the EU market. The operator must also ensure that the soy originates from land not subject to deforestation after 31 December 2020 and meets legality criteria in the country of origin.

Question: How are you expecting the Omnibus developments (tendency to further delay, water down requirements) to affect the EUDR? Do you expect to see changes to the scope of goods or commodities?

Answer: The current Omnibus legislative package does not include direct amendments to the EUDR. While it reflects broader regulatory alignment efforts, no delays or changes to the scope of commodities or products have been proposed through it. That said, simplifications may be introduced via Commission guidance or FAQs to ease implementation, particularly for SMEs. Operators should continue preparations for the 30 December 2024 deadline and monitor updates closely.

Question: Any competent authorities in Greece?

Answer: As of now, Greece has not officially designated a Competent Authority (CA) for the EUDR. However, the Ministry of Environment and Energy is expected to take this role. While enforcement mechanisms are not yet operational, businesses importing or operating through Greece should prepare for compliance and monitor announcements from Greek authorities or the European Commission for updates.

Question: Do downstream actors always have access to the geolocation content of upstream Due Diligence Statements (DDS)?

Answer: No, access to geolocation data in upstream DDS is not automatic. Upstream operators can choose whether to make this information visible to downstream partners. Even if a DDS reference is shared, the actual geolocation data remains hidden unless the upstream actor enabled visibility at submission. This rule is confirmed in the April 2025 FAQ, sections 3.6 and 7.7.

Question: Are GPS coordinates or legality documents of smallholder farms considered personal data under the GDPR?

Answer: Yes. If a GPS point or legality document identifies a natural person—such as a named smallholder—it qualifies as personal data under the GDPR (Regulation (EU) 2016/679). Operators must ensure compliance with data protection principles, including data minimization, lawful processing, and secure sharing. EUDR Recital 84 specifically highlights the need for GDPR compliance in handling such data.

Question: Does the EUDR only protect primary forests, or are secondary and regenerating forests included as well?

Answer: The EUDR applies not only to primary forests but also to secondary forests, naturally regenerating forests, and in some cases, forests under restoration. The definition of "deforestation" includes conversion of any type of forest—whether primary or secondary—into agricultural use. It also prohibits sourcing from forests degraded after 31 December 2020, including through structural changes such as conversion to plantation or other wooded land.

Question: Once items are certified as EUDR, will this certification have a time limit? E.g., FSC certification letter only lasts 1 year, so can be difficult admin-wise to ensure every product onsite has an up-to-date letter.

Answer: The EUDR is not a certification scheme and does not recognize certifications as a replacement for due diligence. Instead, operators and exporters must submit a Due Diligence Statement (DDS) each time they place or export a relevant product. Certifications like FSC may support risk assessment but have no official recognition period under the EUDR. Every consignment must be backed by current, verified due diligence regardless of certification validity periods.

Question: What are the current expected requirements for EUDR? What is the requirement for traders? What is the requirement for exporters? Does the CSRD or CSDDD incorporate these requirements?

Answer: Under the EUDR, all relevant products placed on or exported from the EU market must be deforestation-free as of the cut-off date of 31 December 2020, legally produced according to the laws of the country of origin, and traceable to the specific plot of land where they were produced. Non-SME traders are required to verify upstream Due Diligence Statements (DDS), retain records for five years, and ensure that due diligence has been conducted by the previous operator in the supply chain. SME traders are exempt from submitting DDS but must retain and be able to share relevant documentation with authorities upon request. Exporters have the same due diligence obligations as importers. They must collect geolocation data, verify legality, assess and mitigate risks, and submit a DDS before export, regardless of whether the goods originate within or outside the EU. While the CSRD and CSDDD do not legally include EUDR obligations, they are aligned in purpose. CSRD mandates ESG-related disclosures, including on deforestation risks, and companies can integrate EUDR compliance into their ESRS reporting. CSDDD, although broader in scope, overlaps conceptually by requiring environmental and human rights due diligence, and reinforces the importance of supply chain accountability. Companies subject to all three frameworks should coordinate compliance and reporting systems to meet overlapping due diligence requirements efficiently.

Question: How are companies supposed to conduct a good due diligence if geocoordinates are not shared? We are supposed to check not only plots of land but also legality, which would be impossible without sourcing information.

Answer: The EUDR requires that all relevant commodities and products be traceable to the specific plot of land where they were produced, and that legality is verified based on the laws of the country of origin. Geolocation and legal documentation are essential components of a valid DDS.

Without plot-level geolocation, the DDS cannot be considered complete or compliant. Article 10(2) of the Regulation states that missing information must trigger appropriate risk mitigation measures or, if unresolved, result in exclusion of the product from the EU market.

The April 2025 FAQ reaffirms that incomplete traceability renders a product ineligible for placement or export under the EUDR. **Therefore, if suppliers do not provide the necessary geolocation and legality documentation, operators must not place the product on the EU market.** Ensuring sourcing transparency is a foundational obligation for all operators.

Question: How does the EUDR cover the following scenario: EUDR articles are exported to the UK before 30 December 2025, held in stock in the UK, and later brought into the EU market after the transitional period?

Answer: In this scenario, where a product covered by the EUDR is exported to the UK before 30 December 2025 and later re-imported into the EU, it is considered newly placed on the EU market. Therefore, from 30 December 2025 onward, the product must comply fully with EUDR obligations, including submission of a Due Diligence Statement (DDS), unless the operator can demonstrate that the product was already lawfully placed on the EU market before the end of the transitional period. According to Jan Doubal, such re-importation would typically require full due diligence unless there is existing documentation proving the product's prior legal placement. This position reflects the European Commission's current stance and FAQs 9.1 and 9.2, and it also highlights that simplifications for such cases are still under consideration. Until further clarification is provided, operators should treat re-entry of previously exported goods as a new placement requiring EUDR compliance.

Session 2: The Hidden Costs of EUDR Gaps Beyond Compliance

Question: Downstream operators — despite the new FAQ 3.4 — they retain the liability. As a result, there is a risk for clients to "goldplate" the obligations of their suppliers. How can one comfort its clients that due diligence was carried out beyond an audit?

Answer: Even though downstream operators retain liability under the EUDR, you can reassure clients by providing a complete Due Diligence Statement (DDS) supported by a concise Due Diligence Summary explaining the checks performed. It is helpful to reference third-party certifications used in the risk assessment, while clarifying that these do not replace due diligence, and offer a compliance assurance letter confirming that no risks were identified. Sharing non-sensitive parts of audits or risk assessments can further demonstrate that due diligence has been properly carried out, reducing your clients' perceived risk without them needing to "goldplate" the process.

Question: If due diligence is done for import, isn't it just a matter of time until all goods in Europe are EUDR-compliant? Why then must operators and traders also be compliant for exports from the EU?

Answer: While it may seem logical that once goods enter the EU under EUDR compliance they remain compliant throughout, the Regulation applies independently to each market movement—including both import and export. This ensures that no non-compliant product can be re-exported from the EU to other countries under the false assumption of legality or sustainability. The requirement for due diligence on export prevents the EU from becoming a transit or laundering hub for deforestation-linked goods and upholds the Regulation's global credibility. Removing export obligations would weaken traceability, create enforcement loopholes, and risk undermining the EU's leadership on sustainable trade.

Question: How do we ensure that the costs related to compliance are paid on the EU side?

Answer: The EUDR does not explicitly mandate who must bear the cost of compliance. However, EU-based operators and non-SME traders are legally responsible for ensuring due diligence. To mitigate cost burdens on upstream suppliers, particularly smallholders and producers in third countries, operators are encouraged to share compliance responsibilities and costs. Mechanisms include long-term contracts, co-financing traceability systems, and supporting suppliers through training or technical resources. Contractual terms may be adjusted to reflect these compliance costs, with some buyers choosing to pay premiums for verified products.

Question: Can you recommend any consulting companies that can help us in implementing EUDR? Maybe in the MENA region.

Answer: While specific endorsements are not provided in EU guidance documents, several international sustainability and compliance consultancies operate in the MENA region and offer EUDR-related services. These include firms such as Preferred by Nature, Rainforest Alliance, and Control Union, among others. Many also have partnerships or regional experts based in North Africa or the Gulf. It is recommended to verify their experience with EUDR-specific requirements, including traceability, geolocation, and due diligence system development.

Question: In your interpretation, what would be actions covering the ascertaining that DD had been executed?

Answer: Ascertaining that due diligence (DD) has been executed involves verifying that the three pillars of the EUDR due diligence system have been completed: information collection, risk assessment, and risk mitigation (if needed). This includes confirming that geolocation data is collected, legality and deforestation-free status are assessed, the risk level is determined, and any non-negligible risk is addressed. Documentation and audit trails demonstrating these steps are key to proving that DD was executed. Non-SME traders must be able to show that upstream operators completed these steps.

Question: Do you believe it's possible that there will be another derogation from the application of the regulation?

Answer: While the EUDR implementation timeline includes a transitional period and delayed obligations for micro and small enterprises until June 2026, there is currently no confirmed plan for a broader derogation. However, discussions within EU institutions and Member States continue around implementation guidelines. Some stakeholders have called for temporary adjustments, but any formal derogation would require a legislative amendment or implementing act. Businesses should proceed with full compliance preparations.

Question: RobShaw, do you see PEFC offering some EUDR compliance certification in some form in the future?

Answer: PEFC and other certification schemes (e.g., FSC) are adapting to align with EUDR requirements, but currently no scheme offers a full EUDR compliance certification. Certification can support the risk assessment element of due diligence, especially in demonstrating legality and sustainability, but it is not a substitute for operators' obligations. PEFC has indicated ongoing efforts to incorporate EUDR-aligned criteria, and a formal compliance tool or certification may be developed in the future, but it would still need to be used alongside full due diligence.

Question: We have maybe 20–30 imports per year in the scope of EUDR. Can we submit a due diligence statement in December for our annual imports?

Answer: No, under the EUDR, a Due Diligence Statement (DDS) must be submitted for each individual consignment before it is placed on or exported from the EU market. Submitting one DDS for an entire year's imports would not comply unless all the shipments were from the same sources and placed on the market simultaneously. However, operators may reference a previous DDS for similar shipments if the product, source, and risk level remain identical. Still, each shipment requires documentation and submission in advance.

Question: Since non-SME traders have the same obligations as operators – could you help clear what are the different obligations? What is strictly mandatory for first importer/exporter and not for non-SME trader?

Answer: The key distinction lies in the role of placing or exporting relevant products. Operators (first importers or exporters) must complete the full due diligence process:

information collection, risk assessment, risk mitigation, and submission of a DDS. Non-SME traders do not submit a DDS unless they also act as operators but must ensure their upstream suppliers (the operators) have done so. They must collect and verify the DDS reference, retain records for five years, and ensure no non-compliant product enters their supply chain. Non-SME traders have significant responsibilities but are not required to initiate a DDS unless they place or export the product themselves.

Question: The problem I see now is that a trader/operation cannot get documents from the producer before they fix the purchase. At the same time, if cargo is found non-compliant, being on the way to the EU, everybody in the supply chain is facing a potential big loss.

Answer: This is a known challenge in aligning traditional trade flows with EUDR compliance requirements. The Regulation mandates that due diligence, including submission of the Due Diligence Statement (DDS), must be completed before placing or exporting the product. Operators are encouraged to structure procurement contracts to require access to traceability and legality data in advance. Trade terms (e.g., Incoterms) may need revision to allocate risk appropriately. Until systems are fully aligned, there is a risk of financial loss if shipments are found non-compliant in transit or upon arrival.

Question: What about the obligations for the pallets used for the transport of the goods? If I am a retailer, buying white pallets, do I have obligations as operator or trader?

Answer: Pallets fall under the EUDR scope if they are placed or made available on the EU market and are made of relevant commodities such as wood. Retailers who buy pallets for in-house use are typically not considered operators unless they import or export them or make them available commercially. If the pallets are part of a shipment and not traded as a standalone product, the primary obligation lies with the party placing them on the market. Still, operators must ensure even such packaging complies with traceability, legality, and deforestation-free rules.

Question: What are your thoughts on aggregated traceability/declaration in excess? My company works in the forest sector and it's unclear if we should be declaring in excess and what the risks of doing this are.

Answer: Declaration in excess can be used for aggregated or bulk supply chains (e.g., mills, silos), provided all declared plots are compliant. The risk is that if any single declared plot is non-compliant (e.g., linked to deforestation), the entire shipment becomes non-compliant. This approach requires robust internal controls and a negligible risk conclusion for all declared plots. It is not meant to circumvent traceability but to manage practical logistics

under strict conditions. Excess declaration should be documented, justified, and conservative in scope.

Question: If wood is accompanied by FSC/PEFC certificate, what else is required for the full due diligence compliance?

Answer: FSC or PEFC certification may support risk assessment but does not replace the obligation to conduct due diligence under the EUDR. Operators must still collect plot-level geolocation data, assess legality under the country of origin's laws, evaluate deforestation-free status, and perform a risk assessment. If the risk is not negligible, risk mitigation must also be performed. Certification can lower risk but cannot be solely relied upon.

Question: At CMS, your assessment questionnaire for suppliers for legality checks — is it standard for all suppliers or varies based on the country of location?

Answer: Best practice under EUDR is to tailor supplier assessments to country-specific legal frameworks and risk profiles. While a baseline questionnaire may be standardized, it should be adapted to reflect national legislation, governance risks, and commodity-specific factors. Article 10(2) of the EUDR emphasizes the need to evaluate legality risks based on context, meaning a one-size-fits-all approach is unlikely to meet regulatory expectations.

Question: Do you expect that the EU Commission will provide the list of relevant laws in every single country in the world so companies can check legality without using external legal services?

Answer: It is unlikely that the Commission will provide a fully comprehensive and definitive list of national laws for each country. While some guidance may be offered in FAQs or implementing acts, the responsibility for legal assessment rests with the operator. Many are expected to rely on national authorities, legal counsel, or third-party advisors to interpret applicable laws for land use, environmental, labor, and tax compliance as required under Article 2(40) of the EUDR.

Question: Question related to the HS code 4402. Wood charcoal (including shell or nut charcoal), whether or not agglomerated. Shell and nut charcoal is different from wood charcoal, because you do not remove the tree.

Answer: The EUDR focuses on commodities and products made from listed relevant commodities in Annex I. Shell and nut charcoal, such as coconut shell charcoal, is not derived from wood and typically falls outside HS code 4402 when classified correctly. As such, it is not automatically covered by the EUDR unless it is misclassified or contains wood. Operators should ensure accurate classification and consult customs authorities if in doubt.

Question: Can coconut shells be exempt?

Answer: Yes, under the current scope of the EUDR, coconut shells and products derived from them, such as coconut shell charcoal, are not covered unless they are explicitly included in Annex I or misclassified under covered HS codes. Operators must ensure proper classification and monitor updates to Annex I, as the scope may evolve.

Question: A bit more guidance on the evidence to be submitted for compliance with the laws from country of origin — i.e., China, Canada. Where can we get this information that is freely accessible? We are importer of material in the UK and our customer in the EU market.

Answer: Evidence of legal compliance can include licenses, permits, tax records, labor law compliance certificates, or third-party audit reports. Operators should consult national authorities in the country of production, EU trade delegations, or recognized databases (e.g., FAOLEX or national legal portals). While there is no centralized EU list, tools such as TimberLex and NGO-led legality risk databases can assist. Importers into the UK are not under EUDR, but their EU customers will request this documentation.

Question: As a business we import products from China into the UK only, therefore not affected by EUDR but our customers sometimes send the stock they purchase from us into the EU. They are then going to ask us for DDS/Geo locations — is that correct?

Answer: Yes. If your EU-based customers are placing the product on the EU market (or re-exporting), they become operators under the EUDR and must prepare a DDS. As their supplier, they will likely ask you to provide the required information, including geolocation data and documentation of legal and deforestation-free status. While you are not directly obligated under EUDR, you may need to support their compliance.

Question: Our supplier in China has suggested that material with FSC certification will be EUDR compliant. Is this true?

Answer: FSC certification alone is not sufficient to demonstrate full EUDR compliance. While it may assist with risk assessment, operators must also provide plot-level geolocation, confirm deforestation-free status, and ensure legality as per EUDR Article 3. If Chinese suppliers do not provide geolocation or the certification does not cover traceability to the plot, it will not satisfy the Regulation.

Question: When should we expect a confirmation whether EUDR applies to Northern Ireland?

Answer: As of now, the application of EUDR to Northern Ireland depends on EU-UK arrangements under the Northern Ireland Protocol. Clarification is expected from the European Commission and UK government before the Regulation's full applicability date (30 December 2024 for most businesses). Until formal guidance is issued, companies in Northern Ireland should prepare for potential applicability.

Question: Hello, as a leather tanner deforestation directly is not applicable — I have to do it due to the raw hides I process. Without the DDS from my suppliers I cannot make mine.

Answer: That is correct. As a leather tanner, your obligations under the EUDR stem from the cattle origin of the raw hides, which are a listed commodity in Annex I. If you are placing leather products on the EU market or exporting them, you qualify as an operator. You are responsible for submitting a Due Diligence Statement (DDS), but you will need critical upstream data — particularly geolocation and legality information — from your raw hide suppliers. Without their cooperation and transparency, you cannot fulfill your due diligence obligations. Coordination with suppliers and contractual requirements to share this information is essential.

Question: How would you recommend addressing the risk assessment criterion in the regulation in Article 10(2)(g) on sources, reliability and validity of information used for risk assessment?

Answer: Article 10(2)(g) requires operators to assess the reliability and validity of the information they use in their due diligence process. This means using credible, verifiable, and current data — such as official government records, third-party certifications with proven rigor, scientific databases, and recognized mapping tools. Operators should document how sources were selected and evaluated, justify their trustworthiness, and explain how inconsistencies were resolved. Use of outdated, unverifiable, or biased sources would weaken the risk assessment and may lead to non-compliance.

Question: Could the panelists point to an official checklist of the requirements? It is unclear what documents we need from suppliers.

Answer: While the EU Commission has not issued a single, consolidated checklist, key requirements are detailed in Articles 9 and 10 of the EUDR and elaborated in the April 2025 FAQ and guidance document. Operators must collect: geolocation data for all plots of land, production date or range, confirmation of legality (based on local laws), proof of deforestation-free status (post-2020), and supplier documentation. The FAQ includes practical guidance, but companies may wish to create internal checklists or consult legal experts for commodity-specific requirements.

Refer to articles we published with CMS on [Legal Documentation Required for EUDR Compliance](#) and [A Comprehensive Guide to Mastering EUDR Geolocation Data Collection](#). You can also download a [Request for Proposal \(RFP\) Template](#).

Question: Is it fair to say that the defining characteristic of EUDR is geolocation?

Answer: Yes, geolocation is arguably the cornerstone of EUDR compliance. The Regulation requires operators to trace each relevant product to the precise plot(s) of land where the raw commodity was produced. This enables authorities to verify deforestation-free status using satellite imagery and other tools. Without geolocation, compliance cannot be demonstrated, as the geolocation data also needs to be submitted as part of the Due Diligence Statement. Therefore, the ability to provide accurate, verifiable coordinates is a defining and mandatory element of due diligence.

Question: For companies based outside the EU, I believe the DDS has to be submitted by a company within the EU? If so, does the DDS need to be submitted by a company based in the EU country of import or can this be submitted from a company in any EU country?

Answer: Yes, under Article 7 of the EUDR, the DDS must be submitted by an EU-based operator. If the exporter is outside the EU, they must rely on their importer or authorized representative within the EU to submit the DDS. The operator does not need to be based in the specific EU Member State where the goods are imported — it can be based in any EU country. However, it must be legally established in the EU and accept responsibility for the compliance obligations.

Question: The previous speaker mentioned certain elements are still 'evolving' within EUDR. Is there a formal cutoff date from the EC, where there are no more 'evolutions' possible? Meaning, no more changes and EUDR/Guidance/FAQ are final?

Answer: There is no fixed "finalization" date for FAQs or guidance documents. The EUDR entered into force in June 2023, and its main obligations become applicable from 30 December 2025. However, the European Commission may continue to update guidance documents, FAQs, and implementing acts as more practical experience is gathered and as Member States raise enforcement issues. Businesses should assume that guidance may evolve, particularly in 2025, and remain vigilant to new publications from the Commission. It is very unlikely that there will be any more substantial amendments to the law itself, but rather further refined guidelines for implementation.

Question: It is worrisome that in practice, the cost of compliance is falling on commodity producers, and one of the suggestions is to get a certification, which is an even bigger cost to producers.

Answer: The cost burden of compliance under the EUDR, particularly on smallholder producers, is a widely acknowledged concern. While certification schemes (e.g., PEFC, RSPO) can support the risk assessment process, they are not a substitute for the due diligence obligations mandated by the Regulation. The EUDR places the legal obligation on operators and traders, but these entities often push compliance costs upstream. Strategies such as shared due diligence frameworks, government-supported traceability platforms, and technical assistance programs are being encouraged to reduce the financial pressure on primary producers.

Question: Is risk assessment performed annually or with every shipment?

Answer: Risk assessment under the EUDR must be conducted in connection with each Due Diligence Statement (DDS), corresponding to each instance of placing a relevant product on the market or exporting it. Therefore, risk assessments are not performed annually in a generic way but are tied to the specific transaction or consignment. Operators must demonstrate negligible risk for each batch or shipment unless referencing a previously submitted DDS for the same compliant product.

Question: Is it possible to report EUDR imports annually or must reporting be done per shipment?

Answer: Reporting under the EUDR is not annual; each shipment or batch that is placed on or exported from the EU market must be accompanied by a Due Diligence Statement (DDS). The DDS must contain full traceability and risk assessment data for that specific consignment. However, in the case of recurring imports of identical products from the same verified sources, operators may reference previous DDS submissions to simplify the process—provided that the conditions remain unchanged and full traceability is preserved.

Question: So it makes our normal trading-related risks much much higher

Answer: Yes, the EUDR introduces additional compliance and legal risks that go beyond conventional commercial risks. Operators and traders must ensure strict adherence to traceability, legality, and deforestation-free criteria. Non-compliance can result in product seizures, reputational damage, and penalties. Companies are advised to incorporate EUDR risk management into their contractual, supply chain, and due diligence systems to mitigate these heightened risks.

Question: How will mass balancing work in practice, considering the ability to use declaration in excess for continuous mill processes?

Answer: Mass balancing is not permitted under the EUDR. The Regulation requires traceability to the plot of land for each relevant commodity. However, in cases of continuous processing (e.g., mills), operators may use a “declaration in excess” approach—declaring a broader set of geolocations than the exact quantity being placed on the market—provided that no mixing with unknown or non-compliant materials has occurred. This approach must still comply with traceability and negligible risk obligations. Operators assume full responsibility for all declared plots, even those not directly linked to the specific shipment.

Session 3: Competitive Edge through EUDR: What is required to succeed

Question: The only way to guarantee negligible risk is real-time verification of the area and time of production. However, we know that most systems will rely on OS data from Landsat, Sentinel etc. How will the Competent Authorities assess this?

Answer: Competent Authorities (CAs) are expected to use a combination of satellite data, geospatial analysis tools, and other forms of documentation to verify compliance. While real-time data may enhance precision, the Regulation accepts the use of high-resolution open-source satellite imagery such as Sentinel-2 for deforestation verification. CAs will assess the accuracy and resolution of the data, the date stamps, and how well the imagery aligns with the declared geolocation. Operators must ensure that the data used for

compliance is current, credible, and sufficiently detailed to substantiate the deforestation-free claim for the declared production period.

Question: We have assemblies that hold rubber parts. The HS code does not identify rubber. Does this mean we need to change the HS code to catch the rubber part or would an assembly be out of scope and we only need to focus on individual rubber parts?

Answer: The EUDR applies to commodities and products listed in Annex I, identified by their HS/CN codes. If an assembly is classified under a non-listed HS code, even if it contains small amounts of a relevant commodity like rubber, it may be out of scope. However, if the component itself (rubber part) is separately listed and placed on the market, it is within scope. Operators should verify whether the entire product is captured by a code listed in Annex I. The use of incorrect or misleading HS codes to avoid compliance is discouraged and may be scrutinized by authorities.

Question: How would you differentiate between items with the same HS code — some of them are outside of scope? Example: rubber — same HS code, but different tree species or differentiating organic and synthetic rubber.

Answer: Differentiation within the same HS code is often required to determine EUDR applicability. The EUDR covers only natural rubber derived from the rubber tree species (*Hevea brasiliensis*) and not synthetic rubber made from petroleum derivatives. Operators must use product-specific documentation and declarations to distinguish source material. Even if the HS code is shared, if the product contains no relevant commodity (e.g., synthetic instead of natural rubber), it falls outside the scope. Evidence such as material safety data sheets (MSDS), supplier declarations, or invoices specifying origin can be used to substantiate this distinction.

Question: What do you consider as information under Article 9(1)(h) and how do you collect it?

Answer: Article 9(1)(h) refers to “information demonstrating that the relevant products are deforestation-free.” This includes satellite imagery, land-use records, harvest reports, certification documentation, or third-party audits confirming that the land from which the commodity was sourced was not deforested after the 31 December 2020 cut-off date. Operators typically collect this information through supplier documentation, remote sensing analysis, geospatial verification tools, and national land registries. It should be aligned with the geolocation coordinates provided under Article 9(1)(a).

Question: If risk is identified for a specific shipment, should the acceptance of the delivery be declined and then mitigations are placed, or if there is a risk for a shipment — mitigations are for next batches?

Answer: If a risk of non-compliance is identified for a specific shipment, operators must mitigate that risk before placing the product on the EU market or exporting it. This means that mitigation must be applied to the current shipment — not deferred to future batches. The shipment cannot be accepted under EUDR if the risk is more than negligible and no adequate mitigation has been performed. Risk mitigation may include requiring additional documentation, third-party verification, or supplier audits. Only once the operator can conclude that the risk is negligible can the shipment be legally placed or exported.

Session 4: From Strategy to Execution: Implementing a Successful EUDR Compliance Plan

Question: If we enter in a massive way on EUDR platform all GeoJSON files about batches used, in export can we use the same method to upload all DDS previously obtained? Correspondence 1:1 is not mandatory, right?

Answer: The EUDR allows reuse of a Due Diligence Statement (DDS) when all product details, sources, and compliance parameters are identical. A 1:1 mapping between plots and DDS is not mandatory if the data remains valid and traceable. TradeAware supports bulk upload and manages this through its transaction management module integrated with TRACES. One technical limit to massive declaration in excess is the upload limitation of 25mb per file of the EU's TRACES platform.

Question: During official audits within the EUTR, the supply chain was always requested (documentation from the forest to import). I therefore assume that the authorities will also request this for the EUDR. This was not integrated into the six stages.

Answer: Yes, Competent Authorities will request full supply chain documentation under the EUDR, as with EUTR. This includes all geolocation, legality, and traceability evidence from production to market. Maintaining a documented chain of custody is critical and must be retained for at least five years.

Under Article 9 of the EUDR and its guidance, operators must collect key supply chain information including the name and address of their immediate supplier and buyer (if applicable), a description of the relevant products (type and quantity), geolocation coordinates of the production plot(s), the date or time range of production, and any reference

numbers for previous due diligence statements. However, they are not required to gather contact details for all intermediaries in the supply chain, such as transporters or processors, nor must they list all actors unless those entities directly supply to or purchase from the operator. Additionally, personal or sensitive data about individual farmers is not required unless necessary for demonstrating compliance.

Question: Regarding Article 9 regarding the plot data and geolocation, the EUDR also mentions "the date or time range of production". How is this to be interpreted and how taken into consideration? How detailed should this time-frame be collected?

Answer: The date or time range of production should indicate when the commodity was grown, harvested, or extracted. It must align with the deforestation cutoff of 31 December 2020. The detail can range from exact dates to harvest seasons, as long as it supports the claim of deforestation-free production. For cattle, the time range refers to the entire lifetime of the animal, from birth to slaughter.

Question: Would TradeAware allow communication with other tools if your suppliers work with a different software vendor?

Answer: Yes, TradeAware offers API integration that allows interoperability with external tools and ERP systems. This enables seamless data sharing and reduces duplication across different platforms used by supply chain actors.

Learn how integration works in [LiveEO Introduces TradeAware API for EUDR Compliance](#). You can also explore more in our article on [How to Comply with EUDR Requirements Using Your Existing Supply Chain Systems](#).

Question: Can you comment on the difficulties tier 1 suppliers can have if all their upstream actors of the supply chain request them to submit information in different software solutions?

Answer: Tier 1 suppliers often face challenges managing multiple platforms for compliance. TradeAware addresses this by offering a commercial network approach and standardized data requests. This reduces friction, avoids duplication, and supports consistent information exchange across the supply chain. TradeAware further utilizes the industry standard format GeoJSON to ease implementation.

Question: The geolocation file is per batch or one file covering multiple batches?

Answer: Geolocation files can cover multiple batches if they all originate from the same plots. However, operators must ensure that each shipment is traceable to its source and that the associated DDS reflects accurate, batch-specific data when required.

Question: Can I just "believe" the plot data given to me by a supplier? Also when I am the first professional in the chain? I mean there is a real risk that my suppliers just give me a "clean" plot of land when in fact the products come from somewhere else...

Answer: No, operators cannot rely solely on supplier-provided plot data without verification. They are legally responsible for ensuring its accuracy under the EUDR. This includes checking satellite imagery, documentation, and possibly third-party audits. Trust must be supported by verifiable evidence.

To ensure data integrity and prevent fraud, read [Ensuring Legal Protection Against Supplier Non-Compliance](#).

Session 5: How The Sheridan Group is Preparing for EUDR

Question: When engaging with paper mills, are they (already) — what is your experience as to them sharing EUDR-relevant information (geolocations)? How are you engaging with them, are you including EUDR requirements into contractual terms with mills?

Answer: Sheridan's experience, as shared by Paul Bozuwa, shows that EU-based mills are more prepared to provide EUDR-relevant information, including geolocation data. U.S. mills, on the other hand, are still evaluating whether to implement compliance mechanisms. Engagement with mills involves structured interviews and ongoing conversations, with EUDR obligations being communicated clearly. While not all mills are contractually bound yet, Sheridan is actively working to include EUDR compliance clauses in supplier contracts.

Question: As a company established in the US, how are you planning to provide EU customers with the relevant geolocation data (needed for their DDS)? Did you register for an EORI number to get access to TRACES?

Answer: Sheridan cannot register for TRACES or obtain an EORI number directly due to its non-EU status. Their strategy involves collecting and compiling all relevant data (e.g., geolocation, legality) and passing it to EU-based customers who then submit the DDS

themselves. Sheridan is evaluating whether to set up an EU-based entity to act as an authorized representative, but this is still under consideration due to associated administrative burdens.

Question: Is Sheridan FSC or PEFC certified? How has being certified helped you in the EUDR implementation journey?

Answer: Yes, Sheridan holds FSC certification. This certification has been helpful in supporting legality and sustainability assessments for paper sourced from certified mills. However, FSC certification alone is not sufficient for EUDR compliance; geolocation and deforestation-free evidence must still be collected. Certification is a supportive tool in risk assessment but does not replace full due diligence.

Question: Are you planning to prepare / submit to customers a DDS per print run and/or per same ISBN (given there are different editions of a title)?

Answer: Sheridan's approach involves preparing DDS-like documentation per print run, since each run may use different paper types or suppliers. The product (e.g., book title or ISBN) is only one factor. DDS must reflect the actual materials used, so separate documentation is created for each batch of material relevant to a print job, regardless of ISBN consistency.

Question: How are you planning to ensure EUDR-compliance for prints on demand?

Answer: Sheridan plans to trace each print-on-demand job back to the specific paper batches used. Since print-on-demand involves variable runs, the company links each job with the batch data already collected for that paper type. This ensures that the necessary geolocation and legality information can be compiled and shared with customers for DDS submission.

Question: What is your process to create DDS? Is a DDS based on multiple batches which is valid for example for a certain time in the future or is it based on every single article?

Answer: Sheridan compiles DDS-equivalent documentation per shipment or print run, based on the actual paper batches used. Although multiple batches may be included if traceable to

compliant plots, each DDS is time-bound and shipment-specific. They do not create generic or annual DDS declarations, as the EUDR requires shipment-level traceability.

Question: From a strategic perspective, what kind of impact did EUDR have on your company's future involvement in EU exports? As you mentioned in the beginning, the EU market only counts as a small proportion of your business.

Answer: EUDR compliance has introduced significant overhead for a relatively small share of Sheridan's business. The company is evaluating whether continued EU exports are commercially viable, especially if supplier engagement remains challenging. However, they have committed to helping customers comply and are exploring structural changes, such as an EU entity, to maintain EU market access.

Question: In the scenario where a non-EU country imports pulp from an EU country, then places product back on the EU and non-EU markets, can the converted product simply be supplied with the Due Diligence, GEO location data supplied to us?

Answer: Yes, if the original EU-sourced pulp was EUDR-compliant and accompanied by valid DDS and geolocation data, a non-EU processor may pass this documentation downstream. However, the final operator placing the product back on the EU market must ensure that all information remains valid, unaltered, and traceable. Any processing outside the EU introduces new due diligence obligations if material provenance is altered.

Question: Could you (Sheridan) not register in the EU as a representative? I think that is possible but would be work-intensive for Sheridan.

Answer: Correct. It is legally possible for non-EU companies to establish an EU-based representative who submits DDS on their behalf. Sheridan has acknowledged this option but also highlighted the administrative complexity and cost. The company is still in the decision-making phase about whether this route is feasible long-term.

Session 6: How TradeAware Makes Companies EUDR Compliant

Question: Are you able to summarise briefly exactly how your algorithm eliminates false positives/negatives? E.g., automated comparative analysis of NDVI etc?

Answer: Our algorithm combines automated analysis of satellite imagery with spatial and temporal change detection techniques. We apply machine learning models trained to distinguish natural forests from plantations and other land covers. By analyzing texture and spatial patterns, we significantly reduce false positives and false negatives in deforestation detection.

Question: How does the supplier input the production date of the harvest? I haven't seen it. Thanks.

Answer: In TradeAware, the production date (or time range) can currently be added via the API when creating a transaction. The fields "dateOfProduction" and "endDateOfProduction" are available for this purpose. These align with the requirements of Article 9 of the EUDR and are used to ensure that the declared production period is accurately recorded and traceable within the DDS creation process. Direct supplier input through the user interface will be expanded in future updates.

Question: Does LiveEO have an account of their own on TRACES or do you integrate with your customers' accounts to submit the DDS on TRACES?

Answer: We maintain our own TRACES NT account registered as an Authorized Representative. Through this account, we are able to submit Due Diligence Statements (DDS) on behalf of our customers. While the submission is made via our representative profile, we use the customer's legal identifiers—such as company name, EORI number, and relevant product details—ensuring that the legal responsibility for compliance remains with the operator. This hybrid setup allows us to efficiently facilitate the DDS submission process while fully aligning with the regulatory framework.

Question: Does your algorithm also consider rotation periods for different harvests/species/silvicultural systems etc.?

Answer: Yes, our deforestation assessment models incorporate contextual knowledge such as species type, typical harvest cycles, and silvicultural systems. This helps ensure that lawful, cyclical harvesting is not misclassified as deforestation.

Question: Meaning that to check legality we need to pay some extra cost to CMS?

Answer: Legal assessments provided by CMS are optional and involve an additional cost. While our platform supports legality checks through documentation and structured supplier questionnaires, some clients choose external legal validation for higher-risk regions or audit confidence.

Question: Who pays for the software? Do suppliers have to pay a part when using TradeAware or is it only on the operator?

Answer: Operators and traders who use TradeAware pay for the software. Suppliers do not incur any cost for accessing the supplier portal to submit data like geolocation and legality documentation.

Question: Can you elaborate on how to link the risk assessments to individual transactions and include the data in the ERP? This might be the biggest pain point since we only operate and source from low-risk countries.

Answer: TradeAware links each DDS and associated risk assessment to a transaction ID. We provide API access so this data can be pushed into your ERP system, allowing traceability and compliance tracking at the product or shipment level—even for low-risk commodities.

Question: How long does the risk assessment review by CMS approximately take?

Answer: Turnaround times vary depending on document quality and the country involved. Based on current workflows with CMS, standard reviews can take from a few days to two weeks.

Question: With the API, do you provide a bridge between the European Commission platform and theirs for ease of application? Do you also provide a bridge between the client database and your database using the API?

Answer: Yes, our API enables seamless integration with TRACES NT for DDS submission. We also support integration with clients' ERP or compliance systems, ensuring two-way data flow and reducing manual effort.

Question: The risk assessment can be completed only by answering questions or are there mandatory documents to upload? I haven't seen a document checklist to be uploaded.

Answer: The structured questionnaire is required for all risk assessments. In addition, we prompt users to upload supporting documents based on commodity, country risk, or red flags identified in the assessment. Document uploads are not always mandatory, but they are strongly encouraged.

Question: As a UK company, we want to gather the info required from our suppliers ready for when we sell the product into Europe. Would we be able to use your software to pass this onto our customer for them to be able to do DDS?

Answer: Yes, you can use TradeAware to collect the necessary supplier data, including geolocation and legality documentation. Additionally, you can **connect directly with your EU-based customer on the platform**, allowing you to securely share the relevant data within TradeAware. This streamlines collaboration and supports efficient DDS submission by your customer.

Question: Do you collect the data from the suppliers once a year or does it need to be collected for each batch or commodity? And for every request, is the assessment also collected?

Answer: Data is collected per sourcing event or batch, but if the same plots and risk profiles apply, the information can be reused. Each DDS still requires confirmation that the data remains valid, and risk assessments must be updated when conditions change.

Question: In a previous session we heard that tier 2, 3, 4, etc. can keep their privacy. Can you show how that is done/shown in the LiveEO system?

Answer: Yes, our system uses skip-level privacy. Each actor in the supply chain only sees their direct suppliers. Geolocation and risk data flow downstream, but supplier identities are anonymized beyond direct business relationships.

Question: Is there any mechanism put in place to control how the data source — e.g., what are the anti-fraud mechanisms regarding polygons collection?

Answer: We validate geolocation submissions using satellite imagery, time stamping, and cross-checks with known deforestation databases. We also flag duplicate or reused polygons and offer optional third-party verification for high-risk cases.