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REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL

Simplification review on the Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation (EUDR)

Executive Summary

In December 2025, the European Parliament and the Council adopted an amendment to Regulation (EU) 2023/1115 (hereafter the Regulation or the EUDR). In the revised legal framework, the co-legislators mandated the Commission to carry out a simplification review of the Regulation and to present a report to the European Parliament and to the Council, accompanied, where appropriate, by a legislative proposal, by 30 April 2026.

With this Report, the Commission fulfils its mandate under Article 34(1a) of the Regulation. The Report provides an overview of the simplification measures introduced since the entry into force of the EUDR in June 2023 and assesses their impact on administrative burden and on the overall functioning of the Regulation, with particular attention to micro and small operators, such as farmers and foresters. It also presents additional facilitation measures accompanying this Report, as well as progress in key implementation workstreams, notably the Information System, with a view to ensuring the effective application of the Regulation as of the end of 2026.

As a pioneering instrument to reduce the Union's contribution to global deforestation and forest degradation, the EUDR has already been subject to two targeted legislative revisions, in 2024 and 2025 and in those years, there have been as well two comprehensive sets of measures ([1]) with the aim of facilitating the implementation.

The review concludes that the measures introduced in 2024 and 2025, together with the December 2025 amendments and new simplification measures accompanying this Report, lead to a substantial reduction in administrative burden and a considerable simplification for companies which fall under the scope of the Regulation. This reduction is particularly relevant for operators sourcing from low-risk countries, for micro and small primary operators, and for downstream actors, notably through the introduction of simplified procedures. The new measures presented below include proposed changes to the product scope of the Regulation, clarifications and simplifications of certain provisions, as well as updates to the information system, implementing the recent legislative changes and making sure that it is as user friendly as possible. In order to preserve legal certainty and ensure a stable and predictable regulatory framework for economic operators, and taking into account the progress made in reducing compliance costs, the Commission does not consider it appropriate to propose further amendments to the basic legal text.

The Report includes a number of new simplification measures:

First, the Commission has **updated the Guidance and Frequently Asked Questions to address key stakeholder concerns**. In particular, these documents clarify the possibility to cover multiple shipments under a single due diligence statement and explain, for instance, how forest associations can submit information on behalf of individual forest owners. The Commission also provides further practical guidance on the obligations of downstream operators, including the identification of their position in supply chains and the possibility of a company to be both importer and producer. It also confirms that their role is limited to passive collection and retention of relevant information. Explanations are provided on issues such as e-commerce, geolocation alternatives and on the determination of size thresholds for micro and small primary operators. In addition, the Guidance and

([1]) Sets of documents consisting of Guidance, FAQs and implementing and delegated acts with simplifying effects were published in autumn 2024 and April 2025.

Frequently Asked Questions documents clarify that information collection related to legality should be proportionate to the level of risk, with more detailed evidence required only in higher-risk supply chains. Moreover, user-friendly practical examples illustrating the various supply chain scenarios are provided in the updated EUDR Supply Chain Infographics. The Commission will continue to update the Guidance and the Frequently Asked Questions as necessary, considering stakeholder feedback.

Second, the **product scope has been refined** in the draft Delegated Act ([2]) published for public feedback to ensure a more coherent application of the Regulation, including proposed additions of selected downstream products, such as soluble coffee and certain palm oil derivatives (including soap made with palm oil) as well as some proposed exclusions of the scope, such as leather, samples and retreaded tyres.

Third, the Report also outlines **further developments of the Information System**. These include the updates required by the revised EUDR text, such as the inclusion of simplified declarations, as well as additional functionalities requested by stakeholders, including the voluntary grouping of Due Diligence Statements reference numbers. Overall, these improvements will ensure that the system is robust and ready to support the smooth application of the Regulation from the date it enters into application.

Fourth, the Report presents the **planned establishment of new trade facilitation tools,** such as repositories of legislation of countries producing relevant EUDR products and certification or other third-party verified schemes applicable to commodities covered by the EUDR, with a view to facilitating compliance and legality assessments.

The quantitative assessment indicates that, taken together, the outlined simplification measures are expected to reduce annual compliance costs for companies subject to EUDR obligations by about 75% compared to the initial compliance costs.

At the same time, the Regulation is expected to generate significant environmental and economic benefits ([3]). Early evidence suggests that the EUDR is contributing to structural changes in global supply chains driven by public and private sector synergies, including increased investment in traceability, enhanced transparency and wider uptake of digital solutions, thereby supporting more sustainable and competitive production practices.

([2]) Published for public feedback on Published initiatives.

([3]) Estimated at around EUR 7 billion per year by monetizing 208 thousand hectares of avoided deforestation and 49 million tons of avoided greenhouse gas emissions per year.

1. Introduction

1.1 Policy rationale

The European Union (EU) plays a leading role in global efforts to protect critical ecosystems and combat climate change, in line with the Paris Agreement ([4]), the Convention on Biological Diversity ([5]), the Glasgow Leaders' Declaration on Forests and Land Use ([6]) and the UN Sustainable Development Goals ([7]). This includes tackling deforestation and forest degradation, a priority recently reaffirmed at 30th Conference of Parties of the UN Framework Convention on Climate Change (COP30) in Belém, where the COP30 Presidency proposed a Roadmap to Halting and Reversing Deforestation and Forest Degradation by 2030 ([8]).

The latest 2025 figures from the Food and Agriculture Organization (FAO) Global Forest Resources Assessment ([9]) indicate that, after slowing during the period 2010-2020, the worldwide annual net forest loss rate has increased again and now exceeds 5 million hectares per year, compared to 3.6 million per year in the period from 2010 to 2020 ([10]).

The main driver of deforestation remains the expansion of agricultural land ([11]). As a major global economy, the EU is a producer and a significant consumer of commodities linked to forest loss and hence contributing to the challenge ([12]). This is why, the EU adopted in May 2023 the EUDR ([13]), with the aim of reducing the EU's contribution to global deforestation and forest degradation. By addressing agricultural expansion into forest areas, the Regulation seeks to preserve forests, thereby reducing associated greenhouse gas emissions and protecting ecosystems and the species that depend on them. The Regulation entered into force in June 2023 and has been revised twice, at the end of 2024 and again at the end of 2025, introducing targeted simplifications and an extended period for its application.

The scope of the EUDR covers seven commodities - cattle, cocoa, coffee, palm oil, soy, wood and rubber. Research ([14]) indicates that these seven commodities accounted for more

([4]) United Nations Framework Convention on Climate Change, *Paris Agreement*, FCCC/CP/2015/L.9/Rev/1 (12 December 2015), https://unfccc.int/sites/default/files/english_paris_agreement.pdf.

([5]) United Nations, *Convention on Biological Diversity* (opened for signature 5 June 1992, entered into force 29 December 1993), 1760 UNTS 79, https://www.cbd.int/convention/text/.

([6]) UK Government (COP26 Presidency), *Glasgow Leaders' Declaration on Forests and Land Use* (2 November 2021), https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/.

([7]) United Nations, *Transforming Our World: The 2030 Agenda for Sustainable Development*, UN Doc. A/RES/70/1 (25 September 2015), https://sdgs.un.org/2030agenda.

([8]) Government of Brazil (COP30 Presidency), *Roadmap to Halting and Reversing Deforestation and Forest Degradation by 2030* (May 2024), https://www.cop30.br/en/forests-roadmap.

([9]) Global Forest Resources Assessment 2025.

([10]) Nevertheless, there are regional differences where some geographical areas experience net forest area increase.

([11]) FAO. 2022. The State of the World's Forests 2022. Forest pathways for green recovery and building inclusive, resilient and sustainable economies, available at https://doi.org/10.4060/cb9360en.

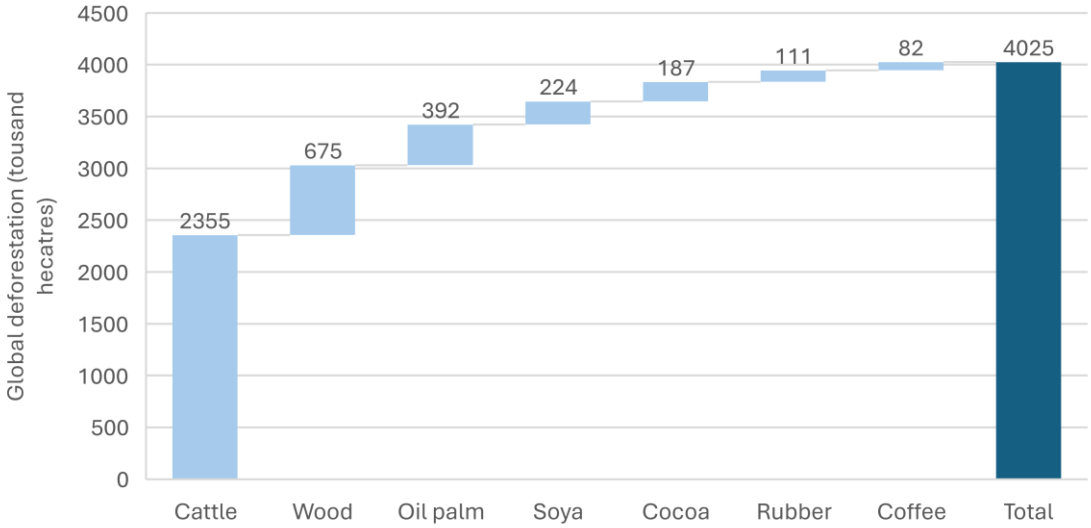
([12]) Kastner, T. et al. (2013) *Analysis of the Impacts of EU Consumption on Deforestation: Comprehensive Analysis of the Impact of EU Consumption on Deforestation*. International Institute for Applied Systems Analysis (IIASA), Laxenburg, Austria, https://pure.iiasa.ac.at/id/eprint/14868/1/1.%20Report%20analysis%20of%20impact.pdf.

([13]) European Union, *Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation*, OJ L 150, 9.6.2023, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115.

([14]) Singh, C., Persson, U.M. Global patterns of commodity-driven deforestation and associated carbon emissions. *Nat Food* **7**, 138–151 (2026), https://doi.org/10.1038/s43016-026-01305-4.

than 4 million hectares of deforestation globally each year between 2015 and 2020, thereby representing approximately 70% of the agricultural driven deforestation (Figure 1).

Figure 1: Global deforestation, in thousand hectares per year, driven by the seven commodities in scope of the EUDR between 2015 and 2020 (Singh & Persson, 2026).



1.2 Recent trends and developments

Countries across the globe are already preparing for the implementation of the EU Deforestation Regulation, often using it as a catalyst to strengthen traceability systems and sustainability initiatives across commodity supply chains and to improve forest and agricultural monitoring and governance. These positive effects have been documented in recent research ([15]), demonstrating growing synergies between government and private sector initiatives worldwide. For instance, a report by Forest Trends indicates that, as of February 2026, at least 25 producer countries are implementing over 60 government-led initiatives linked to EUDR compliance, many of which address broader governance issues such as land tenure, traceability, and legal clarity beyond individual supply chains ([16]).

A substantial part of these efforts has been facilitated by EU and Member States funding via technical support and programmes ([17]) empowering smallholders, incentivising forest

([15]) Brack. D, How the EUDR Is Already Driving Forest Governance Reform: From Market Signal to Systemic Impact, Forest Policy, Trade and Finance Initiative, April 2026, at How the EUDR Is Already Driving Forest Governance Reform - Forest Trends, April 2026.

([16]) For example, recent studies include Brack. D, How the EUDR Is Already Driving Forest Governance Reform: From Market Signal to Systemic Impact, Forest Policy, Trade and Finance Initiative, April 2026, at How the EUDR Is Already Driving Forest Governance Reform - Forest Trends, April 2026; Sotirov, M., Policy Brief - The EU Deforestation Regulation Is Already Delivering Results, Deutsche Umwelthilfe, April 2026, available at Policy_Brief_Dr._Metodi_Sotirov_-_The_EU_Deforestation_Regulation_Is_Already_Delivering_Results_-_Why_further_weakening_during_the_Simplification_Review_risks_undermining_progress_in_global_forest_governance.pdf.

([17]) Such as a dedicated Technical Facility on deforestation-free value chains, financed by the EU and Member States under the Team Europe Initiative (TEI) on Deforestation-free Value Chains. Further TEI flagships projects include the Sustainable Agriculture for Forest Ecosystems programme (SAFE) which supports smallholders' EUDR preparedness in ten priority countries, AL INVEST Verde which supports traceability efforts in Latin America and the Market Access Upgrade Programme (MARKUP II) aimed at fostering EUDR related capacity building in Africa.

preservation, and strengthening local capabilities for sustainable land use and agriculture as well as job creation.

Experience from ongoing programs and initiatives showcase three major trends across case studies in Africa, Asia and Latin America:

- the rapid development and continuous improvement of traceability of supply chains and geolocation systems;
- the strengthening of national data and certification frameworks; and
- the emergence of innovative digital systems.

For example, a digital coffee traceability system introduced in Ethiopia records the supply chain from farm to export and captures geospatial data via mobile applications to verify that coffee is deforestation-free. Similarly, Ghana has rolled out the *Ghana Cocoa Traceability System*, mapping thousands of farms and linking farmer registration to export data, enabling buyer-facing due-diligence reports. Kenya is also making use of remote sensing technologies in preparation for the EUDR implementation ([18]). Highly accurate national land-use maps have been developed in Côte d'Ivoire, in close coordination with the Commission's Joint Research Centre (JRC). Innovative digital platforms, such as Argentina's VISEC platform enable traceability of soy exports. Brazil's innovative "Selo Verde" governmental system integrates environmental data and farm registries to monitor compliance with forest legislation. Honduras has already shipped fully traceable coffee to the EU using an open digital infrastructure that includes smallholder farmers, demonstrating the potential of such systems to support deforestation-free supply chains. Thailand has built EUDR THAI Traceability platform - a traceability system that functions as a single central database for deforestation and legality inputs, across all seven commodities. In Malaysia, national sustainability standards for palm oil, rubber and timber have been upgraded and aligned with EUDR information requirements. Likewise, Indonesia and Malaysia are adapting their national sustainability standards and developing integrated traceability systems. ([19])

The EU remains committed to implementing the EUDR through collaboration, transparency, and open dialogue with its trading partners, including through trade agreements, related platforms and through the World Trade Organisation. The simplification measures outlined in this Report explain applicable rules and provide clarifications for third countries exporting to the EU. The Commission will continue its outreach and support third countries in addressing challenges related to ensuring deforestation-free supply chains.

EU Member States are also making steady progress in implementing the EUDR, including adoption of national laws implementing the EUDR. Member States' competent authorities are actively engaging with national stakeholders through dedicated seminars and information campaigns, as well as by adapting and expanding their IT infrastructure to support compliance. Member States, supported by the Commission, are also focusing on harmonised enforcement. For example, as part of the EU-funded EUDR Preparedness Exercise, Member States have conducted, in cooperation with selected companies across the EUDR-sectors, multi-month voluntary compliance inspections (commonly referred to as "dry runs"). ([20]) The Commission also organised end of November 2025, as part of its Technical Assistance and Information Exchange programme, the Flagship Multicountry

([18]) Sotirov, M., Policy Brief - The EU Deforestation Regulation Is Already Delivering Results, Deutsche Umwelthilfe, April 2026.

([19]) Sotirov, M., Policy Brief - The EU Deforestation Regulation Is Already Delivering Results, Deutsche Umwelthilfe, April 2026.

([20]) Report on dry runs for coffee sector is available here: Insights_EUDR-exercise_Coffee.pdf.

Workshop on the implementation and enforcement of the EU Deforestation Regulation where Member States shared information, best practices and lessons learned.

Significant progress has also been made in mapping global forest cover and land cover using remote sensing tools. A new global forest layer has been developed by the JRC as part of Commission's work on the EU Observatory on Deforestation and Forest Degradation, to support risk assessments under the EUDR. The Global Forest Cover map for the year 2020 provides a harmonized, globally consistent representation of forests at 10m spatial resolution, meeting the forest definition as set out in the EUDR ([21]). It has been created by integrating multiple satellite-based datasets ([22]). The map is continuously updated as new data and user feedback become available, enhancing accuracy and representation of forests worldwide. There is also a notable boost in the development of new commercial geo-spatial information tools in the private sector. The Commission regularly showcases and facilitates the exchange of best practices among EU Member States, third countries and private stakeholders via the Expert Group Multi-Stakeholder Platform on Protecting and Restoring the World's Forests (see Chapter 2.1 for more information).

1.3 Background to the EUDR simplification measures

The two revisions of the EUDR legal text were initiated following comments from various stakeholders to provide more time for all countries and stakeholders for its implementation and to ensure meaningful simplifications.

In December 2024, based on a Commission proposal, the European Parliament and the Council added an extra year for the entry into application. In December 2025, they adopted an additional amendment of the EUDR ([23]), building on a second Commission proposal ([24]), adding another year before entry into application (December 2026) and introducing some changes on substance, in order to simplify the practical implementation and reduce the amount of data submissions required.

In Regulation (EU) 2025/2650, the Council and the European Parliament also included a clause (Article 34(1a)) requiring the Commission to carry out a "*simplification review of this Regulation and on this basis present a report to the European Parliament and to the Council accompanied, where appropriate, by a legislative proposal*" to be delivered by 30 April 2026.

Recital 14 of the amending Regulation further states that "*the report should evaluate the administrative burden and impact of that Regulation, in particular for micro or small operators. Furthermore, in the report, the Commission should indicate possible ways to address the identified issues, including through technical guidelines, improvements to the IT system, and delegated or implementing acts."*

As mentioned above, the Report outlines the simplification measures introduced under the EUDR since its entry into force in June 2023 and provides an assessment of the resulting administrative burden and overall impact of the Regulation, in particular for micro or small

([21]) Bourgoin, C., Verhegghen, A., Carboni, S., Ameztoy, I., Degreve, L., Fritz, S., Herold, M., Tsendbazar, N., Lesiv, M., Achard, F., and Colditz, R.: GFC2020: a global map of forest land use for year 2020 to support the EU Deforestation Regulation, Earth Syst. Sci. Data, 18, 1331–1365, https://doi.org/10.5194/essd-18-1331-2026, 2026.

([22]) Such as Copernicus Global Land Cover and Tropical Forest Mapping and Monitoring Service, ESA World Cover, WRI Tropical Tree Cover, UMd Global Land Cover, Global Mangrove Watch, and JRC Tropical Moist Forests.

([23]) Regulation (EU) 2025/2650 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders, OJ L, 2025/2650, 23.12.2025, ELI: http://data.europa.eu/eli/reg/2025/2650/oj.

([24]) COM(2025) 652 final.

operators. It also evaluates the extent to which these simplifications have contributed to reducing administrative burden on operators and traders. In addition, the Report presents further facilitation measures proposed by the Commission following the EUDR revision of December 2025, including update of the FAQs and Guidance documents, draft Delegated Act proposal on the product scope, as well as developments relating to the information system, aimed to ensure the effective application of the Regulation by the end of 2026.

The Report presents in Chapter 2 the simplification measures already implemented since the entry into force. Chapter 3 outlines the stakeholder feedback, inputs, and evidence base underpinning the new simplification measures introduced as part of the current simplification package. These measures are summarised in Chapter 4 while Chapter 5 presents the estimated quantitative impacts of both the previous and new simplification package.

2. Simplification measures implemented up to the end of 2025

2.1. Engagement with stakeholders

Since the entry into force of the EUDR in June 2023, the Commission has adopted a range of measures to support its implementation, based on input and evidence collected from stakeholders and Member States.

All along, the Commission has gathered stakeholder feedback through consultations, workshops, studies, bilateral meetings, and expert platform discussions.

In 2024 and 2025, the Directorate-General for Environment has organised around 700 bilateral meetings with stakeholders to gather input and address questions. Half of these meetings involved engagements with private sector actors, including business associations, companies, NGOs, as well as IT service providers and research institutions. Most of the other meetings were held with third countries representatives (government officials, businesses and business associations, civil society actors, etc) in Brussels, during meetings in partner countries, and online.

The dedicated Multi-Stakeholder Platform on Protecting and Restoring the World's Forests (MSP), an expert group of the Commission, is also an important source of input and feedback. The Platform provides guidance and support to the Commission on the implementation of the EUDR, the preparation of delegated and implemented acts, and the enforcement of EU legislation, programmes, and policies related to the protection and restoration of global forests, including combating illegal logging. It also facilitates coordination with Member States and other stakeholders. The Platform currently has 89 members: 62 stakeholders, and 27 Member States. Third countries, international organisations and selected stakeholders participate as observers. The participating stakeholders include business associations, NGOs and other stakeholders, representing all seven commodities covered by the EUDR. Going forward, the Commission will launch a call to select new members of the Multi-Stakeholder Platform (MSP) in view of the revised EUDR and amended product scope.

Over the course of 2024 and 2025, fourteen such Platform meetings were held. Meetings typically included both a general assembly and a Member States only session, featuring Commission and stakeholders' presentations, as well as dedicated time for stakeholders to ask questions and raise possible concerns. Typically, a general assembly is attended by approximately 150 participants. To enhance sectoral representation, 12 additional associations and NGOs were granted observer status in 2025.

In addition to the Platform, the Commission is actively contributing to the Informal Enforcement Working Group on the EUDR, an informal expert group organised and chaired by Member States with a view to discuss policy issues and harmonise enforcement.

Feedback provided during all these exchanges have underpinned the Commission's work to facilitate implementation, harmonised application and enforcement of the Regulation as outlined below.

The Commission will continue to ensure structured, meaningful and inclusive engagement with all relevant stakeholders, with a view to supporting the effective, coherent and timely implementation of the Regulation.

2.2 Measures related to the Information System

The Regulation tasks the Commission with setting up and managing an Information System pursuant to Article 33 of the EUDR. The Information System is necessary for economic operators to comply with the EUDR and for competent authorities to enforce it. Ensuring the operability of the Information System is therefore critical, as it must handle all IT transactions initiated by economic operators in scope of the Regulation.

Following exchanges with stakeholders and Member States, in December 2024, the Commission adopted the implementing act on the Information System ([25]), which lays down the rules for its functioning. The information system opened for registration on 6 November 2024 and was launched on 4 December 2024, allowing operators and their authorised representatives to submit due diligence statements. A parallel training server was also launched on the same day, providing a possibility for stakeholders to familiarise themselves with the system features.

Since then, the Commission has supported stakeholders with relevant explanatory documentation about the use of the system, including User Guides and training videos available via the dedicated Europa website ([26]). Online trainings have since the launch in October 2024 reached over 33.000 stakeholders during 85 training sessions.

Upon request from industry and Member States, an Application Programming Interface (API) was developed and published in the second quarter of 2024. This interface was designed to allow companies to connect their internal systems directly to the EU platform through a machine-to-machine connection, enabling operators to submit and manage due diligence statements in bulk rather than entering information manually through the website (graphic user interface). Further functions introduced in the system simplify stakeholders' submissions, such as re-using existing data content, uploading geolocations as data files, providing a searchable map to identify and confirm proper geolocation input and possibilities for amending or withdrawing the incorrect submitted data to correct mistakes.

2.3 Guidance and Frequently Asked Questions documents

Clear and comprehensive guidance serves as a vital bridge between legislative intent and practical implementation, ensuring that businesses and public administrations understand their obligations.

To this end and as a result of close cooperation with stakeholders and Member States, the Commission published in the course of 2024 and 2025 two iterations of a Guidance

([25]) Commission Implementing Regulation (EU) 2024/3084 on the functioning of the information system pursuant to Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation OJ L, 2024/3084, 6.12.2024, ELI: http://data.europa.eu/eli/reg_impl/2024/3084/oj.

([26]) Accessible at Deforestation - Environment - European Commission.

document ([27]) and four iterations of Frequently Asked Questions (FAQs) ([28]) relating to the implementation of the EUDR. Moreover, several infographics explaining in detail relevant supply chain scenarios were published ([29]). These materials provided further clarifications improving legal clarity, facilitating consistent interpretation and reducing administrative burden across Member States and supply chains while providing operational simplifications.

These existing Guidance and FAQs aimed to provide clarifications and promote a clear and harmonised approach to the implementation of the legislation. For example, the FAQs highlighted the possibility to cover multiple shipments/batches under a single due diligence statement, and the so-called declaration in excess which allows operators trading in bulk commodities to declare more plots than the specific plots actually used for the production of the relevant commodities. These clarifications significantly reduced logistical complexity and administrative effort. Moreover, in the case of composite products, it was clarified that the operator only needs to conduct due diligence on the main commodity deemed relevant under the EUDR.

Given the most recent changes to the EUDR, parts of the Guidance and the FAQs (such as interpretation of the 'ascertaining' obligations, simplified re-import procedures for SMEs or clarifications on double submissions of due diligence statements) are in the meantime rendered obsolete and have been removed.

2.4 Legislative amendments

End of 2024, a revised EUDR ([30]) text was adopted that gave an additional year to all economic actors and public authorities to prepare for the entry into application of the EUDR.

In May 2025, the implementing act establishing a list of countries classified according to their deforestation risk was adopted. Under this act, more countries are classified as "low risk" than anticipated in the initial impact assessment, hence enabling operators sourcing from low-risk countries to benefit from simplified due diligence while focusing enforcement efforts of competent authorities on higher risk areas, together accounting for 95% of global forest loss. ([31])

Throughout 2025, projections on the number of expected operations and interactions in the Information System led to a substantial reassessment of the load on the system, indicating much higher traffic on the Information System than anticipated. To address these risks and avoid a failure of the Information System, the Commission proposed targeted amendments in October 2025 to reduce the strain on the IT system and at the same time easing the administrative burden for economic operators.

([27]) Guidance Document for Regulation (EU) 2023/1115 on deforestation-free products, OJ C, C/2024/6789, 13.11.2024, ELI: http://data.europa.eu/eli/C/2024/6789/oj.

([28]) https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/e126f816-844b-41a9-89ef-cb2a33b6aa56/details.

([29]) https://op.europa.eu/en/publication-detail/-/publication/693156f0-5d3b-11f0-a9d0-01aa75ed71a1/language-en.

([30]) Regulation (EU) 2024/3234 amending Regulation (EU) 2023/1115 as regards provisions relating to the date of application, OJ L, 2024/3234, 23.12.2024, ELI: http://data.europa.eu/eli/reg/2024/3234/oj.

([31]) Commission Implementing Regulation (EU) 2025/1093 of 22 May 2025 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), C/2025/3279, OJ L, 2025/1093, 23.5.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/1093/oj

On 19 December 2025, the European Parliament and the Council adopted a revised EUDR, adding an extra period before the entry into application and introducing some changes on substance. All companies, whether in the EU or elsewhere, received one more year to prepare for entry into application. More specifically, the EUDR will enter into application on 30 December 2026 with regard to all companies except for most micro- or small operators, for which the entry into application is 30 June 2027. For micro- or small operators already covered by the EU Timber Regulation ([32]), the entry into application will be 30 December 2026.

Under the revised legal text, the due diligence model shifted from a system in which every actor placing, transforming, or trading in relevant products (with the exception of SMEs) had to submit a due diligence statement, to a simpler system where this responsibility now lies with the first operator placing a relevant product on the EU market or exporting it. Downstream operators and traders are no longer required to submit their own due diligence statement in the Information System nor to ascertain that due diligence was exercised across supply chains. Instead, their obligations are mainly limited to registering in the EUDR Information System (for non-SMEs), and, only in the cases where they are placed just after the operator in supply chains, collecting the due diligence statement reference numbers received.

In order to reduce administrative burdens as much as possible, a new category of micro or small primary operators was also introduced. This category applies to micro and small primary operators established in countries classified as low-risk that, in the course of a commercial activity, place on the market or export relevant products that they themselves have grown, harvested, obtained, or raised on specific plots of land. These operators, essentially farmers and foresters, are no longer required to submit due diligence statements every time they place a product on the market or export it. Instead, they only need to submit a one-off simplified declaration and pass the corresponding declaration identifier to downstream operators or traders.

Key points – chapter summary:

In 2024 and 2025, the EU implemented key simplification measures for the EUDR, guided by extensive stakeholder engagement. Guidance and FAQs documents were published to clarify obligations, introducing flexibilities such as single due diligence statements for multiple shipments, simplified re-imports for SMEs, and streamlined rules for composite product.

Legislative amendments in December 2024 and 2025 added each an extra year to prepare better for entry into application and shifted due diligence responsibilities to first placers on the EU market, exempting downstream traders from submitting due diligence statements while introducing a one-off simplified declaration for micro or small primary operators.

3. Stakeholder feedback informing the new simplification measures

This chapter presents the evidence collected from stakeholders after the revised 2025 EUDR text. The insights form an essential part of the evidence base supporting the new package of measures.

([32]) Regulation (EU) No 995/2010 laying down the obligations of operators who place timber and timber products on the market Text with EEA relevance, OJ L 295, 12.11.2010, pp. 23–34.

3.1 Stakeholder engagement activities

3.1.1 Consultations with stakeholders

To identify the most relevant topics for new FAQs and Guidance documents and to be able to analyse them, the Commission invited stakeholders at the 38th MSP ([33]) in December 2025 to submit questions and feedback following the new legal text. By the end of February 2026, over 110 submissions had been received. From these, more than 750 questions and comments were extracted and analysed. Contributors included trade and business associations (35%), individual companies (20%), EU Member State authorities (12%), third-country authorities (12%), third-country trade and industry associations (5%), and NGOs and other organisations such as service providers and certification bodies (16%). Additionally, 48 meetings took place with representatives from the private sector, Member States, and third countries. Furthermore, the MSP met already twice in 2026 (February and March).

3.1.2 Public consultation in 2025 on the draft Delegated Act on the EUDR scope

A draft Delegated Act to amend the EUDR with regard to the list of relevant commodities and products was published for public consultation in April–May 2025 ([34]). 291 responses were received from citizens, business associations, NGOs, research institutions, law firms, companies, and public authorities, both within and outside the EU. The draft text gained broad consensus from stakeholders. The feedback period was also used by 40% of respondents to give input on recommended additions or removals of certain products.

3.1.3 Public consultation on the Environmental Omnibus

During the public consultation on the environmental omnibus in 2025 ([35]), a large number of respondents provided input on the EUDR despite it not being included in the scope of the omnibus. Inputs were received from more than 550 stakeholders, covering both high-level comments and detailed position papers, as well as from approximately 1,800 citizens. The substantial feedback offers valuable insights into stakeholder expectations, support, and implementation concerns.

3.1.4 Consultations regarding the Information System

To better evaluate the volume of data to be handled by the Information System, understand user interactions, and collect feedback on user experiences, a targeted survey was launched in January 2026, followed by a limited number of follow-up interviews. Through trade associations, 155 companies across all EUDR commodities, ranging from small domestic producers to multi-commodity multinational operators, were invited to participate. 140 companies took part in the survey. The Commission has also organised two workshops to better understand challenges operators encounter when using the Information System's graphical user interface. The first workshop focused on micro or small primary operators and the second on importing operators.

3.2 Key stakeholder perspectives and feedback: five areas for further clarification and simplification

Stakeholder feedback received from the activities outlined above has been carefully analysed. Five focus areas were identified where stakeholders ask for further clarification

([33]) Summary Record of the 38th Meeting of the "Multi-Stakeholder Platform on Protecting and Restoring the World's Forests" with a focus on Deforestation and Forest Degradation, 11.12.25.

([34]) EU rules to minimise deforestation & forest degradation – amendment of Annex I to the Deforestation Regulation

([35]) Simplification of administrative burden in environmental legislation

or simplification: micro or small primary operators, downstream supply chain obligations, due diligence obligations (legality and zero-risk category), product scope and the Information System.

3.2.1 Micro or Small Primary Operators

A significant portion of the feedback centred on the methodology for calculating the estimated annual quantity of relevant products, while others questioned the circumstances under which a postal address could replace geolocation data. Stakeholders also sought clarification on how to determine the company size, also in light of year-to-year fluctuations. Larger companies with only partial involvement in relevant commodity production asked for clarity on the criteria relating on how to qualify as micro or small primary operators, as well as how to identify and assess the relevant business segments for qualification. Additionally, there were requests for guidance on whether micro or small primary operators must update one-time simplified declarations and what constitutes a "major change" triggering such updates. Some forestry cooperatives requested the ability to submit simplified declarations on behalf of their members. Finally, cattle farmers highlighted the need to clarify roles within the supply chain, specifically who should be considered an operator, downstream operator, or trader - particularly in cases involving live animals.

3.2.2 Downstream supply chain obligations

Stakeholders provided detailed feedback on supply chain obligations, with emphasis on clarifying roles and procedural requirements. They argued that first downstream actors should have a passive rather than proactive obligation to collect reference numbers or declaration identifiers, stressing that only the first operator being the sole party capable of self-identification should bear responsibility for passing these details downstream. Clarification was widely sought on the practical meaning of the "collect and keep" obligation for first downstream actors, including acceptable transmission and storage formats, whether these must align with individual shipments or products, and whether downstream actors are expected to routinely verify their validity. Stakeholders also highlighted the need for flexibility, requesting that a single entity could assume multiple roles. Questions arose around customs declaration requirements for exports by downstream operators, particularly whether a generic code would suffice or if original reference numbers must be used. Further uncertainties centred on treatment of re-imports. Finally, stakeholders called for practical guidance on verification obligations for non-SME downstream actors.

3.2.3 Due diligence obligations

Stakeholders highlighted gaps in the current guidance with regard to assessing and demonstrating compliance with legality requirements, urging further clarification on how to evaluate adherence to trade laws, labour standards, human rights protections, and prohibitions on child labour. To streamline compliance efforts, they called for greater accessibility to a centralised repository of relevant national legislation in producer countries, emphasising the need for the Commission to facilitate transparent access to these legal frameworks. Additionally, it was suggested to introduce "green lanes" for certified products and to better link existing certification schemes to due diligence obligations.

Some stakeholders have also proposed introducing a "zero-risk" classification for countries with negligible deforestation risk to reduce or eliminate due diligence obligations for operators sourcing from those countries.

3.2.4 Product scope

Stakeholders have raised questions regarding the scope and categorisation of products, particularly following the removal of HS 49 (books and printed material) from Annex I by co-legislators at the end of 2025, which has created ambiguities around which printed products remain in scope. Clarification was widely sought on exemptions for used, second-hand, waste, and by-products, as well as samples, where definitions were considered unclear. Further uncertainties were noted concerning obligations tied to packaging materials, pallets, and product displays, with stakeholders questioning their inclusion. To ensure a coherent approach across the supply chain, there were opposing requests in terms of expanding the scope to include additional derived products—such as soap, soap noodles, balloons and other finished products made of rubber latex, soluble coffee, and several palm oil derivatives (including biofuels and animal feed). Conversely, some products, including cattle skins, retreaded tyres and selected palm oil derivatives, were proposed for exclusion due to operational or technical justifications, while some stakeholders were against such exclusion. Finally, small operators advocated for the introduction of a *de minimis* rule to exempt small quantities from EUDR obligations.

3.2.5 Information System

Stakeholders highlighted critical technical and operational priorities for the EUDR Information System, calling for API timelines to be accelerated to enable timely IT developments. They supported grouping reference numbers and identifiers for downstream actors, while also requesting registration and voluntary due diligence statement submission by downstream actors to enhance flexibility. Another key demand was implementation of contingency planning, such as issuing conventional due diligence statement numbers in case of system outage. Operational efficiency was emphasised through requests to increase file size limits (currently 25MB). Stakeholders urged enhanced error reporting with detailed documentation, as well as transparent geolocation data processing, including aligning checks between the user interface and API submissions. To reduce system strain, stakeholders proposed implementation of webhooks to notify operators of status changes in their submissions. Operators also requested introduction of service accounts to allow multiple authorised persons to access the system. Access for non-EU operators to the IT system was a concern of stakeholders from third countries. Competent authorities requested adequate technical support and implementation time for system integration.

Key points – chapter summary:

Stakeholder feedback informing the simplification review highlighted five critical areas needing clarification:

- micro or small primary operator qualification;
- downstream supply chain obligations;
- due diligence obligations (legality and zero risk);
- product scope ambiguities; and
- Information System improvements.

4. Identified measures

Taking into consideration the feedback described in Chapter 2 and 3, the Commission has identified a set of measures that addresses the raised concerns to a large degree and facilitates and streamlines implementation.

Below, the key updates across the Guidance and FAQs documents (Section 4.1), Information System (Section 4.2), and product scope (Section 4.3) are presented. Moreover, the chapter introduces a new initiative focused on the establishment of legal and certification repositories (Section 4.4).

4.1 Guidance and FAQs documents to ensure harmonised implementation and enforcement

The Commission Guidance and FAQs documents aim to support consistent and proportionate implementation of the Regulation across Member States, ensuring clarity for economic actors and competent authorities. Member States are encouraged to take them into consideration for their enforcement and penalty policies to avoid disproportionate burdens, particularly as regards micro or small primary operators. In particular, in line with the risk-based approach set by the EUDR, Member States are encouraged to focus inspections and enforcement actions on actors with most obligations in terms of due diligence under the EUDR such as those first placing products on the market. For downstream operators and traders, these actions should be proportionate to their obligations, which have been amended in the revised EUDR. The Commission will continue to work with Member States to ensure convergence of enforcement practices, including where necessary by way of templates and tools.

Following the amendment of the EUDR in 2025, **the FAQs and Guidance document have now been updated**. Alongside the necessary adjustments, the Commission took the opportunity to analyse stakeholder input on the basis of which several additional operational clarifications were introduced. These are grouped into three categories: simplifying clarifications for the downstream supply chain, micro or small primary operators, and for all operators regarding legality. Detailed explanations are provided in the updated documents; examples of scenarios are provided in the EUDR Supply Chain Infographics ([36]).

4.1.1 Further relief for the downstream supply chain

The first set of operational clarifications concerns the clearer determination of roles in the downstream supply chain and clarifications regarding imports and exports.

Under the revised EUDR, **downstream actor** must collect and keep information (mainly name, the postal address, and email address) about their direct business partners. This information is typically included in standard commercial data such as invoices, that most downstream operators and traders already possess as part of routine transactions. The information is to be exchanged outside of the EUDR system.

Only when the direct supplier of the downstream actor is an (upstream) operator, making the downstream operator or trader a so-called **first downstream operator or trader**, must the required information also include the due diligence statement reference numbers or declaration identifiers of the relevant products.

In detail, in order to ensure practical simplification for downstream actors, the new Guidance and FAQs documents present a pragmatic approach for such actors to determine whether they are the first downstream operator or not. It is clarified that the obligation of the first downstream supply chain actor to collect and keep the reference numbers or declaration identifiers is a passive one - the downstream actor does not need to investigate or proactively ask their supplier for the reference number or declaration identifier. The downstream operator or trader, acting in good faith, can presume that their suppliers are

([36]) EUDR supply chain infographics (3rd edition) - Environment

not upstream operators if they do not receive reference numbers or declaration identifiers from them. In a typical retail situation, i.e. where the downstream actor sells their product to an end user, the downstream actor has no obligation to collect or keep the information mentioned above from this end-user. Lastly, while downstream actors have an obligation to inform the authorities in case of information pointing to non-compliance, including substantiated concerns, this is a purely reactive obligation and does not entail active obligations to inquire for such information along the supply chain. Moreover, the situation of downstream actors is also to be taken into account in Member States' enforcement policy (see introduction to section 4.1 above).

In terms of re-imports, the FAQs clarify that re-importing products is a downstream activity. If the importer can provide evidence that the products being placed on the EU market have already been placed on the EU market previously or are derived from products previously placed on the EU market, the importer is considered a downstream operator. At customs, the "re-importer" can make use of a conventional reference number.

Non-SME downstream actors have the obligation to act upon information indicating possible non-compliance, including substantiated concern. The FAQs and Guidance documents contain clarifications on how these actors can verify that due diligence was exercised in case of substantiated concerns, offering different possibilities depending on the information obtained.

The FAQs further clarify cases in which one and the same company has a "dual role", for example when the company imports a relevant product and then transforms it before selling it in the EU market. Such company would be both an operator and a (first) downstream operator.

Additionally, the FAQs explain that downstream operators exporting products that are covered by an existing due diligence or simplified declaration are exempted from the obligation to submit a reference number or declaration identifier to customs authorities at export. Instead, a dedicated TARIC certificate code can be used.

Finally, it is clarified that in the cattle supply chain, the first natural or legal person placing live cattle on the EU market is the (upstream) operator. All subsequent sellers of live cattle are traders and do not have to carry out due diligence or submit a due diligence statement or simplified declaration.

4.1.2 Further relief for Micro or Small Primary Operators and declarations by authorised representatives

Micro or small primary operators are subject to a very simplified regime. Specifically, instead of the obligation to submit a due diligence statement to the information system, they are only required to submit a one-time simplified declaration to the EUDR information system. They also may use postal address instead of geolocation provided that it clearly corresponds to the geographic location of the plots of land or, in the case of cattle, of the establishment concerned.

A set of operational clarifications for micro or small primary operators clarifies which companies qualify and benefit from a simplified declaration. In detail, the FAQs clarify that even a larger company may qualify as a micro or small primary operator if it can demonstrate that the business segment engaged in activities related to relevant commodities and products meets the micro or small primary operator criteria. The clarifications also include explanations on the use of postal address as an alternative to geolocation. Notably, it is explained that beyond the direct postal address, as an additional simple option, cadastral information or an equivalent allowing the identification of the plot of land or establishment can be used instead of geolocation.

Additionally, the FAQs specify that it is not needed to update the simplified declaration if the annual production quantity of the relevant product changes. If harvesting and placing on the market happen irregularly (for example, only once every ten years), the micro or small primary operators can, in their simplified declarations, count only the years in which products are actually placed on the market into the estimate. In case of a multi-year harvest plan, the annual estimate can alternatively be the highest annual estimate to be harvested under the plan.

Micro or small primary operators have the possibility to use authorised representatives (such as national or regional government bodies, associations or cooperatives/product groups) to submit data on their behalf. When the cooperative itself produces relevant products which it places on the EU market (for example in the case of sales of standing timber), it may qualify as an operator under the EUDR. In such cases, the cooperative, rather than its members, can submit a single due diligence statement, or, in case the cooperative meets the definition of micro or small primary declaration, a single simplified declaration.

In addition, the Commission is promoting the submission of data available in national databases on behalf of the micro or small primary operators and is assisting Member States in fully utilising the simplifications introduced under Article 4a(4). Farmer and forest cooperatives and other associations can be considered operators or micro or small primary operators, depending on the actual role they play in supply chains, specifically when they place the relevant products on the market themselves. This depends on the arrangements between farmers, foresters and associations, and on the national laws regulating those arrangements.

4.1.3 Simplifications of due diligence obligations, in particular for trade with low-risk countries

In response to calls for clarifications on due diligence obligations, the revised Guidance document provides a clearer explanation on due diligence obligations of operators regarding simplified due diligence and information collection on relevant legislation according to Article 2(40) and Article 9(1)(h). In particular, it is explained that operators sourcing from low-risk countries benefitting from simplified due diligence are not obliged to carry out risk assessment and adopt risk mitigation measures, unless they obtain or are made aware of information that would point to a risk that the relevant products do not comply with the EUDR. It also emphasises that micro or small primary operators source, by definition, from low-risk countries and are, therefore, never required to carry out risk assessment or risk mitigation unless a risk of non-compliance is identified.

Furthermore, the Guidance introduces clarifications as to how to prove compliance with the relevant laws of country of production (the so-called legality criterion). To support operators in proving compliance with the legality criterion, the Commission will set up repositories of relevant legislation of the country of production and of certifications schemes (see section 4.4 below). The Guidance underlines that operators can decide, based on a first examination of available information, such as publicly available reports, indicators and classifications of countries and regions of production, whether an in-depth information collection is needed. They can base themselves on the Commission repository for these purposes. If this initial examination indicates a negligible risk of non-compliance, operators should not be required to carry out an in-depth data collection. Only for supply chains, production areas and countries of production where the initial information available to the operator indicates a higher risk of non-compliance, an in-depth evidence collection on compliance with relevant legislation of the country of production should be prioritised.

4.2 Information System

To ensure the Information System can accommodate the increased volume and variety of transactions arising from the revised Regulation, the Commission has carried out a comprehensive technical review of the system architecture. As a result, targeted improvements have been made to enhance its processing capacity, data handling, and operational resilience. These improvements incorporate feedback from stakeholders and competent authorities on the system performance and availability, as well as internal projections of transaction volumes. A dedicated testing programme will validate the system's readiness prior to its reopening.

Following a temporary closure of the information system to integrate the necessary adjustments triggered by the revision of the Regulation, the Commission will relaunch the Information System in stages. The reopening is planned for June 2026 (for both training and production environments). Subsequent updates will include additional functionalities and enhancements to be rolled out later in summer and ahead of the date of application of the Regulation.

The information system will include features to facilitate implementation, for example mechanisms to support Member States' authorities in analysing geolocation data. Following the amendment of the EUDR in December 2025, the Information System will also include new features. The Commission Implementing Regulation (EU) 2024/3084 of 4 December 2024 is also being amended accordingly. The main functionalities and changes being introduced in the Information System and Implementing act, bringing operational simplifications, will be:

- Enabling the submission of simplified declarations, following existing Due Diligence Statement format and in line with the revised EUDR text, also to be supported by Application Programming Interface (API);
- Registration of new roles (micro or small primary operators, non-SMEs downstream operators or traders);
- Updating the webservice specifications to mirror the existing system functionalities and contingency arrangements;
- Voluntary grouping features to be also added following requests from the business sector.

In parallel, the Commission encourages submission of information held in national databases and will support Member States in using the simplification introduced by Article 4a(4), with a view to ensure that the administrative burden for micro and small primary operators is negligible. The Commission will establish the necessary technical infrastructure (notably through API) to facilitate this process.

To further support operators in the use of the system, the Commission will continue to refine the system and its documentation on an ongoing basis. This includes planned updates of user instructions, guidance on geolocation data handling, and the description of error codes. Specific attention will be given to facilitating data submissions for micro or small primary operators, including via their producer organisations or associations acting as authorised representatives on their behalf.

4.3 Product scope

Together with this Report, the **Commission also published for public feedback a draft Delegated Act** ([37]) **with adjustments to the product scope of the EUDR** defined in

([37]) Published initiatives

Annex I. This annex lists the relevant products subject to EUDR obligations when they are placed on, made available on, or exported from the market. The Commission is empowered to amend the Annex a delegated act.

The Commission seeks stakeholder views on the introduction of horizontal exemptions and clarifications, on the streamlining of how EUDR provisions apply to specific categories of products and use cases, as well as on targeted changes to specific CN codes in order to ensure a coherent approach and effective implementation of the EUDR.

Specifically, horizontal exemptions are proposed to ensure that the EUDR focuses on products that are associated with deforestation risks, while avoiding unnecessary administrative burden. In particular, the draft text proposes to exempt samples and products used for examination, analysis, and testing; single-use packing materials and packing containers; reusable packing materials and containers; marketing and information materials; waste, used, and second-hand products; as well as items of correspondence. Most of these clarifications were already part of the draft Delegated Act published for public feedback by the Commission in 2025.

Additional horizontal clarifications are introduced by clarifying that products listed in Annex I of the EUDR are covered by its obligations only insofar as they are produced from a relevant commodity. To this end, the draft Delegated Act introduces prefix *'ex'* to several entries in Annex I to ensures that products made with non-relevant commodities, such as coconut oil or bamboo, are not captured within the scope of the Regulation. Clarification of relevant species are also provided to ensure a clear and consistent interpretation of the product scope.

In addition, the draft Delegated Act introduces changes to the EUDR product scope to ensure a smooth and effective entry into application, building on a uniform and coherent approach across commodities, and preventing the relocation of deforestation risk. The draft Act proposes to remove from the EUDR scope retreaded tyres [(38)] as well as cattle skins and hides [(39)].

At the same time, based on stakeholder feedback, some downstream products are proposed for inclusion in the EUDR scope to prevent gaps in obligations applicable in the supply chain and prevent the relocation rather than the elimination of deforestation risk - soluble coffee, certain palm oil derivatives including soap made with palm oil, and frozen cattle tongues.

The draft Delegated Act is published for a 4-week public feedback period accompanied by a Staff Working Document presenting the methodology used to assess products for potential inclusion in or exclusion from the scope of the EUDR.

4.4 New trade facilitation tools: Repositories of legislation and certification schemes

EUDR implementation requires in some cases that economic operators and competent authorities navigate a different landscape of national laws in the due diligence process. Operators may make use of certification schemes as part of their risk assessment pursuant Article 10(2).

([38]) The products proposed to be removed from the EUDR scope are retreaded rubber tyres for motor cars (HS 40121100), retreaded rubber tyres for buses (HS 40121200), retreaded rubber tyres for aircrafts (HS 40121300), other retreaded rubber tyres (HS 40121900), solid or cushion rubber tyres (40129020) and rubber tyre flaps (HS 40129090).

([39]) The cattle and skins product codes proposed to be removed from the EUDR scope are raw hides and skins of cattle (HS 4101), tanned or curst hides and skins of cattle (HS 4104), and leather of cattle, further prepared after tanning or crusting (HS 4107).

To support stakeholders in this effort, the Commission will establish two repositories:

- one repository listing relevant legislation of the country of production, as per Article 2(40) of the EUDR, and
- one repository on certifications schemes applicable to EUDR-relevant commodities.

These repositories will benefit economic operators and competent authorities as they will facilitate access to relevant information needed for the due diligence process and help proving compliance with Article 9(1)(h). The existence of a single, centralized source of information will also foster transparency and avoid duplication of efforts between Member States, thereby lowering the associated administrative costs. Through these two repositories, the sharing of best practices will be facilitated, and consistency in the application of the Regulation across Member States will be ensured.

The two repositories will be hosted on dedicated websites. The Commission will provide templates outlining the specific information required for each repository to ensure their EUDR relevance and consistency with the legal text. The information will be provided by third countries and owners of certification schemes. The repositories will support compliance efforts by facilitating access to relevant information, particularly when it comes to legality requirement and the relevant legislation of the country of production.

The Commission plans to launch the repository of relevant legislation and the repository of certifications schemes before the entry into application of the EUDR in December 2026. Third countries and relevant stakeholders will be invited to share relevant information to ensure that the repositories are complete.

Key points – chapter summary:

The simplification package, responding to the concerns from stakeholders, provides in particular:

- clarification for downstream operators, notably explaining that the role of first downstream operators in collecting reference numbers from operators is passive, explaining the applicable rules on re-imports and substantiated concerns;
- clarification for micro or small primary operators, notably providing guidance on size thresholds;
- clarification on the principle of legality verification, including clearer guidance on simplified due diligence requirements;
- update of the Information System (reopening as of June 2026) introducing new functions to reflect changes of the EUDR text such as registration of new roles, simplified declarations, and additional functionalities, including additional or improved APIs, as well as voluntary grouping tools following suggestions from stakeholders;
- refining of the product scope by proposing to introduce certain horizontal exemptions, removing certain products (e.g. retreaded tyres, cattle skins and hides) and including others (e.g. soluble coffee, certain palm oil derivatives and frozen cattle tongues) as outlined in the draft Delegated Act published for public feedback;
- launch of repositories of relevant legislation of producing countries and certification schemes by end of 2026.

5. Quantitative evaluation of simplification efforts

Building upon the simplifications explained in Chapter 2 and 4, this chapter presents an economic quantification of the recurrent annual compliance costs for operators and traders (Section 5.1) and the associated annual environmental benefits (Section 5.2) of the EUDR. This provides a consistent basis for comparison on an annual basis.

5.1 Economic quantification of administrative burden

Taken together, the legislative and non-legislative simplification measures described in the preceding chapters are estimated to reduce annual compliance costs for companies subject to EUDR obligations by approximately 75% - from estimated EUR 8.1 billion per year under the Regulation as it entered into force in 2023 to EUR 2.0 billion per year once all simplification measures are accounted for ([40]).

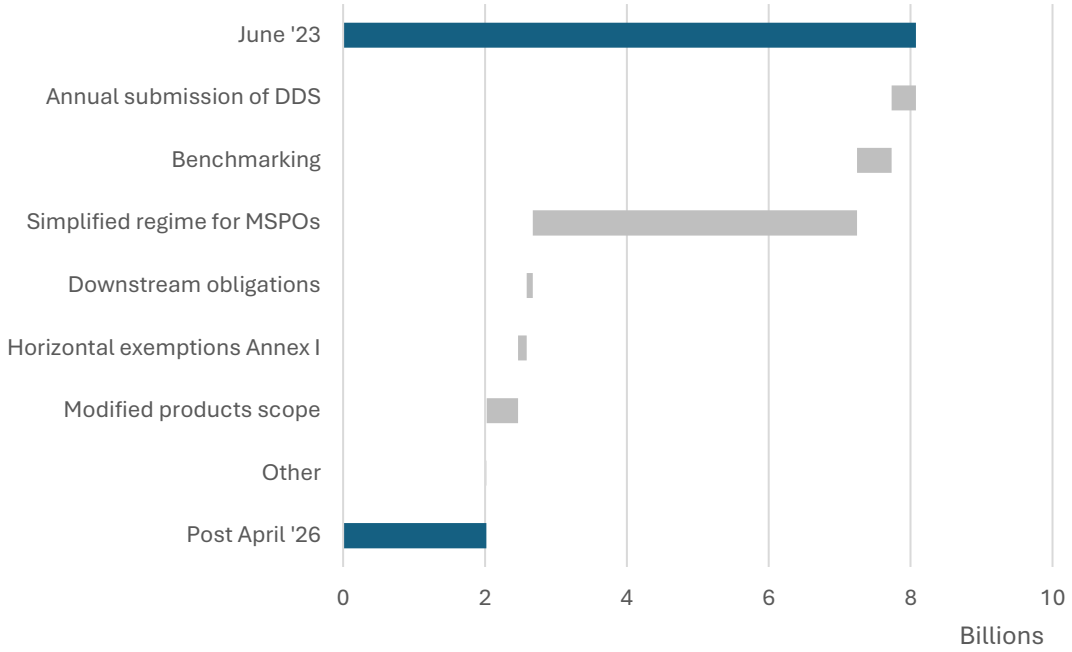
This significant decrease is driven by a combination of targeted adjustments that collectively simplify the regulatory framework. Quantified past cost-saving measures include the risk classification exercise (May 2025), under which more countries are classified as "low-risk" than anticipated in the initial impact assessment, the possibility of annual submission of due diligence statements (clarification in FAQs and Guidance documents of April 2025) and the simplified regime for micro or small primary operators (2025 EUDR revision).

The quantification also captures the latest simplifications published together with this Report. The proposed changes in the draft Delegated Act published for public feedback, such as the inclusion of downstream palm oil products and the removal of leather, and horizontal exemptions are considered. In addition, further cost reductions arise from a clearer interpretation of how due diligence is verified, as well as from interpreting the collection of identifiers or reference numbers as a passive obligation for downstream actors.

An overview of the savings at each step is presented in Figure 2. In total, the largest cost reductions are driven by the introduction of the simplified regime and EUDR scope changes. The former is particularly impactful due to the large number of micro and small primary producers. While cost savings for large downstream operators are significant at individual operator level, their contribution to total EUDR compliance cost reductions remains more limited due to their relatively small share in the overall operator population.

([40]) This quantification captures recurring annual operational compliance costs but does not include capital expenditures related to system development.

Figure 2: Breakdown of cost savings since entry into force in June 2023, by simplification packages introduced between April 2025 and April 2026, in billion per year



Methodology for the economic quantification

The methodology ([41]) applied the standard cost estimation approach, calculating annual recurrent costs by multiplying the number of operators and traders subject to the EUDR with a fixed average cost per actor.

The recurrent costs include, in line with the definition in the initial impact assessment, the costs of employees dedicated for the task, maintenance of systems, and costs related to the collation, aggregation and analysis of the data, including in some cases professional services for third party audit costs and surveys.

The computations build on the economic quantifications from the initial impact assessment, but the baseline has been extended to capture actor segments previously omitted. Compliance cost calculations now cover all importing operators, replacing the initial assumption that only half of them incur additional due diligence costs. Downstream operators, traders, and domestic producers are also included, reflecting recurring compliance costs that were previously excluded due to data gaps or assumptions of negligible impact.

For importing and downstream operators, medium and large domestic primary producers and traders, the same unitary due diligence cost estimates from the initial impact assessment are applied. That assessment assumed a compliance cost per company of EUR 1,000 for the low range, EUR 10,000 for the central range, and EUR 15,000 for the high range when sourcing from standard or high-risk countries. This analysis focuses on the central value of EUR 10,000 per company. An operator sourcing from low-risk countries is assumed to incur half of the standard cost. For micro or small primary operators, due

([41]) This methodology builds upon the "*Assessment of environmental reporting and the potential for simplification*" study commissioned by the Commission and expected to be published in late 2026. The computational steps are updated to include the simplifications presented in the Delegated Act, FAQ and Guidance published together with this Report.

diligence costs are assumed at EUR 500 per operator per year, reflecting their lower expenses for supply chain tracing and compliance documentation.

A 10.7% reduction in per-operator cost is introduced following the simplifications outlined in the April 2025 FAQs and Guidance documents, most notably the possibility to cover multiple shipments or batches under a single annual due diligence statement. This estimate is based on the assumption that reporting costs account for approximately 11% of total due diligence costs ([42]), combined with data on shipment frequency indicating that businesses handle an average of 42 shipments per year (excluding samples).

To capture the effect of the risk classification exercise in May 2025, where more countries are classified as "low-risk", a larger portion, 51% instead of 20% previously, of the importing operator base is assigned half of the standard compliance cost.

To quantify the simplifications introduced by the December 2025 amendment, the per-operator cost for micro or small primary operators is significantly reduced, as the obligation to regularly submit due diligence statements is replaced by a one-off declaration that may be updated in the event of major changes. For these calculations, it is assumed that the statement is updated on average once every 20 years, reducing the annual recurring cost by 95%. Similarly, downstream operators and traders, who no longer need to pass on reference numbers, are assumed to incur only 5% of their initial compliance costs to passively collect and store the reference numbers received from upstream operator.

Changes in product scope, both from the 2025 amendment and the 2026 draft Delegated Act, are incorporated by adjusting the size of the importing operator population based on the number of unique operators for all EUDR-relevant products, as derived from the Directorate-General for Taxation and Customs Union's Surveillance database. Starting from an estimated 352 thousand operators, excluding books, leather, and retreaded tyres, and including derived palm oil products, coffee, and frozen cattle tongues, reduces the number of unique importing operators to 275 thousand. fFollowing the updated Guidance and FAQ documents, further reductions in costs for downstream operators and traders are applied, reflecting the pragmatic approach on how due diligence is verified, as well as from the collection of identifiers or reference numbers clearly being a passive obligation for downstream actors. Additionally, a 6.8% reduction in costs is applied to reflect horizontal simplifications introduced in the draft Delegated Act. This reduction is primarily driven by exemptions for waste and used products (4.6%), followed by packaging materials (1.95%), while bamboo-related products account for a smaller share (0.25%) and samples have a negligible impact (0.004%). The share of waste and used products was estimated using proxy indicators, typically inferred from other product categories for which data was available via import values associated with specific CN codes. The value of samples was derived from customs trade data by applying a €150 threshold to identify low-value shipments as samples. Bamboo-related exemptions were calculated using CN codes that enabled a clear distinction between bamboo and wood products. Lastly, savings related to packaging materials were estimated based on relevant CN codes covering items such as wooden packing cases, crates, pallets, casks, barrels, cartons, and boxes. The analysis does not cover broader enforcement or implementation costs annually incurred by public authorities in EU Member States in relation to the Regulation as a whole. These costs, estimated in the original impact assessment at around EUR 18 million per year, are expected to vary only marginally and, given that they are approximately two orders of magnitude smaller than the estimated recurrent compliance costs for operators and traders, are not expected to affect the overall proportionality of the Regulation. The same applies

([42]) European Commission (2020) Study on due diligence requirements through the supply chain

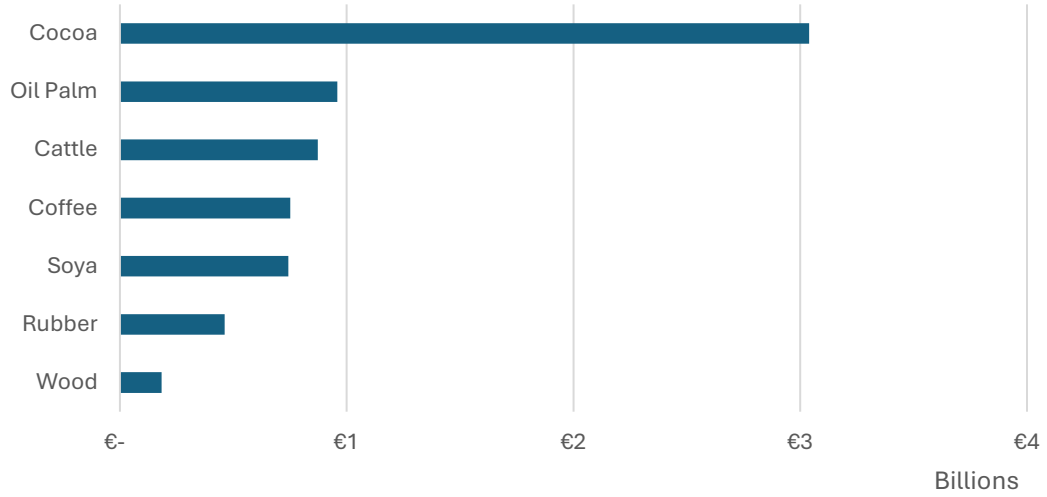
to the expected costs to be incurred by the European Commission, estimated in EUR 16.5 million over the first six years of implementation.

This analysis does not account for the one-off costs incurred by operators, such as developing and instituting a due diligence policy, procuring and installing necessary IT systems, informing and training staff and supply chain partners, as these costs are not comparable on an annual basis. These costs are expected to decrease in proportion to the reduction in the number of unique operators subject to the EUDR resulting from the changes to the product scope.

5.2 Proportionality of costs and environmental benefits

Building on data from 2015–2020 ([43]), the EUDR is, after the removal of HS49 and including the changes proposed in the Delegated Act, estimated to generate economic benefits of approximately EUR 7 billion per year by monetizing 208 thousand hectares of avoided deforestation and 49 million tons of avoided greenhouse gas emissions both within the EU and embedded in imports. It thereby significantly exceeds the post-simplification estimated costs of compliance. Figure 3 illustrates the breakdown of environmental benefits by commodity following the modifications proposed in the draft Delegated Act.

Figure 3: Environmental benefits from the new scope, both within the EU and embedded in imports per year broken down by commodity ([44])



Methodology for the computation of environmental benefits

The environmental benefits are quantified based on the deforestation and emissions footprints associated with import of goods covered under the EUDR and the deforestation and emissions associated with the production of the relevant commodities within the EU. The deforestation footprint represents the area of land converted from forest to agricultural use for the production of the relevant commodity. The emissions footprint reflects the net difference in carbon stocks associated with this land-use change. This methodology does not capture the environmental benefits of a reduction in forest degradation. The deforestation and emission indicators are monetized separately and subsequently

([43]) Because the DeDuCE dataset by Singh and Persson (2026), which provides estimates of deforestation by country and commodity, is only available up to 2022 and exhibits limitations for the years 2021–2022, the analysis focuses on the period 2015–2020. Main limitations are related to delays in national reporting of agricultural land-use and harvested area data, which serve as inputs to the DeDuCE model, may distort deforestation signals in the years 2021-2022.

([44]) The environmental benefits for wood are an underestimation as forest degradation, the conversion of natural to managed or plantation forest, is not included in the computations.

aggregated to estimate total environmental benefits. Deforestation impacts are valued using an ecosystem services approach and emissions are valued using a carbon price derived from the Emissions Trading System (ETS). An ecosystem services value ([45]) of €10,000 per hectare per year is adopted from Brander et al. (2024) ([46]) as a representative value for tropical, subtropical and temperature forests, while a carbon price of €100 per ton of CO_2 is adopted in line with the initial impact assessment ([47]).

The deforestation footprint and associated emissions linked to EUDR-relevant imports are estimated using a range of literature sources. First, country-level estimates of total deforestation associated with the production of the seven commodities in the EUDR scope are obtained from Singh and Persson (2026) ([48]). Using production data from FAOSTAT, a deforestation intensity is calculated for each country–commodity combination, defined as the ratio of deforestation to national production of that commodity.

The embedded deforestation associated with imports of derived products is then calculated by multiplying the deforestation intensity by the volume of the derived product imported into the EU (COMEXT, COMTRADE), and by the mass fraction of the primary commodity contained within the final product.

To account for differences between the country of production and country of origin, distinct deforestation intensities are applied for raw commodities and derived products. For raw commodities, the deforestation intensity is based solely on deforestation and production within the country of origin, as described above. For derived products, the deforestation intensity is calculated as a weighted average that reflects the production, import, and export flows of the relevant raw commodity, thereby approximating the geographic mix of upstream sourcing.

The deforestation footprint and associated emissions linked to the production of EUDR-relevant commodities within the EU are set equal to the average deforestation and emissions from land conversion over the period 2015–2020, thereby implicitly assuming that the deforestation associated with the production of relevant commodities within the EU will be fully halted when the EUDR enters into application.

Using the above-described methodology, the updated product scope of the EUDR is estimated to avoid 208 thousand hectares of deforestation and with that 49 million of tons of greenhouse gas emissions both from production within the EU and embedded in imports.

([45]) An ecosystem service value is the quantified benefit that humans derive from natural ecosystems, such as clean water, food production, climate regulation, recreation, and the maintenance of genetic resources that support crop improvement, medicine development, and ecosystem resilience.

([46]) Brander, L. M., De Groot, R., Schägner, J. P., Guisado-Goñi, V., Van't Hoff, V., Solomonides, S., ... & Thomas, R. (2024). Economic values for ecosystem services: A global synthesis and way forward. *Ecosystem Services*, *66*, 101606.

([47]) Commission Staff Working Document – Impact Assessment (2021).

([48]) Singh, C., & Persson, U. M. (2026). Global patterns of commodity-driven deforestation and associated carbon emissions. Nature Food, 7(2), 138-151.

Key points – chapter summary:

- The combined simplification measures outlined in this report are projected to cut annual compliance costs for companies by 75%. ()
- The EUDR is expected to yield economic benefits of around EUR 7 billion per year by monetizing 208 thousand hectares of avoided deforestation and 49 million tons of avoided greenhouse gas emissions.
- The cost reductions are especially significant for micro or small primary producers, companies sourcing from low-risk countries and actors in the downstream supply chains.