EU Deforestation Regulation (EUDR)

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EU rules to reduce deforestation related to production and import into the EU of certain agri-food products: cattle, cocoa, coffee, palm oil, and soya

Regulation (EU) 2023/1115 on certain commodities and products associated with deforestation and forest degradation

Commission Implementing Regulation (EU) 2025/1093 laying down rules for the application of Regulation (EU) 2023/1115 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)

Regulation (EU) 2025/2650 of the European Parliament and of the Council of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders

Commission Delegated Regulation (EU) 2026/2102 of 13 July 2026 amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products

Update

In June 2023, the European Commission published Regulation 2023/1115 on certain commodities and products associated with deforestation and forest degradation (cattle, cocoa, coffee, palm oil, soya, rubber, wood). These rules respond to the alarming rate of deforestation resulting from the expansion of agricultural land to produce certain commodities. As European consumption of these commodities and related products contributes indirectly to deforestation, the EU aims to curb this practice and reduce the associated greenhouse gas emissions and biodiversity loss. The new rules will have significant implications for agri-food operators in the cattle, cocoa, coffee, palm oil, and soya value chains in low- and middle-income countries.

In May 2025, the Commission adopted Regulation 2025/1093, which classifies countries according to three levels of deforestation risk (low, standard, and high) in relation to commodities covered by the EUDR (Regulation 2023/1115): cattle, cocoa, coffee, palm oil, rubber, soya, and wood. For more details on the listing of countries and the benchmarking process, see EU Deforestation Regulation: Engagement with non-EU countries.

In December 2025, European Union law makers agreed on simplifying certain aspects of the European Union Deforestation Regulation (EUDR), and postponing for a second time the application of the Regulation for 12 months (Regulation 2025/2650). For more information, see

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Review of EU Deforestation Regulation: simplification. The EUDR will now apply from **30 December 2026** for large EU companies, and from **30 June 2027** for micro and small EU companies.

In July 2026, the European Commission updated its Guidance Document that clarifies key terms and definitions of the Regulation, and in August 2026, its Frequently Asked Questions addressing questions raised by stakeholders. Further resources can be found on the Commission webpage Implementing the EU Deforestation Regulation.

In September 2026 the Commission clarified which products must meet EUDR requirements by:

- adding some products to the scope of the EUDR, including soluble coffee and frozen cattle tongues
- excluding from the scope of the EUDR, packaging (derived from wood) used to protect agri-food products in transit, marketing materials and correspondence, and product samples for quality testing
- clarifying that where products could be derived from palm oil or from other similar commodities, only those produced from palm oil will have to meet EUDR requirements.

Impacted products

cattle, cocoa, coffee, palm oil, soya

What is changing?

In September 2026, the European Commission clarified which products must comply with the EUDR requirements (Regulation 2026/2102):

- the EUDR requirements will apply to soluble coffee and frozen cattle tongues
- the EUDR requirements will not apply to packaging (derived from wood) used to protect agri-food products in transport, marketing materials and correspondence, or product samples for quality testing
- where products can potentially be derived either from palm oil or from other similar commodities, only those produced from palm oil will have to meet the EUDR requirements.

The EUDR (main Regulation 2023/1115 and subsequent regulations, e.g. Regulation 2025/2650) establishes conditions for placing certain commodities/products associated with deforestation on the EU market. It creates the need for comprehensive traceability of information and documents, together with geolocation data that demonstrate that the relevant commodities and products are "deforestation-free" and "legal".

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Targeted commodities/products

The EU has identified risks of deforestation in relation to the following commodities:

- cattle
- cocoa
- coffee
- palm oil
- rubber
- soya
- wood

as well as products made from them (e.g. chocolate, soyabean oil, cattle meat). The full list of products (and relevant customs codes) is contained in Annex I of the proposed Regulation.

Obligations across supply chains

EU operators may only trade and sell these commodities/products on the EU market if they are "deforestation-free" and "legal". The EUDR therefore obliges EU operators to exercise due diligence before placing relevant commodities and products on the EU market. This means that the *first* EU company to place the relevant products on the EU market is required to collect and analyse information from their suppliers that demonstrates the produce is deforestation-free and legal. Further "downstream operators" that subsequently process and/or sell those products will not have to submit due diligence statements to the EUDR Information System.

What is "deforestation-free"?

For agri-food products, "deforestation-free" means that the relevant commodities/products were produced on land on which no deforestation has taken place after 31 December 2020. In the case of meat, operators should ensure that the feed used for livestock is deforestation-free. However, no geolocation information is required for the feed itself (see European Commission Frequently Asked Questions Document, 1.26.1).

What is "legal"?

"Legal" means that relevant commodities/products have been produced in accordance with the relevant legislation of the country of production. This relevant legislation could include land-use rights; environmental protection; forest-related regulations; third parties' rights; labour rights; human rights; the principle of free, prior, and informed consent, including as set out in the United Nations Declaration on the Rights of Indigenous Peoples; tax and anti-corruption regulations. The updated Guidance provides important clarifications on legality (section 6) that are relevant to non-EU suppliers. This includes a clarification that the relevant legislation in this case consists only of laws applicable in the area of production and not the entire supply chain.

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What do non-EU producers and suppliers need to do to meet the new rules?

Non-EU country producers and suppliers will have to make the following information available to the EU businesses that sell the commodities/products on the EU market (Art. 9):

- geolocation of all plots of land where the commodities were produced
- date or time range of production.

Where products contain commodities produced in different plots of land, details of all these plots must be provided. For cattle meat, geolocation refers to the establishments where the cattle were kept.

Small operators from low-risk countries that put their own products directly on the EU market will only need to upload a simplified declaration of EUDR conformity (not a full due diligence statement). These small operators have greater flexibility in how they demonstrate the geographic location of their production (geolocation data or the postal address of the plots of land or establishment where the products are produced).

Definitions

- "Plots of land" means land within a single property that is sufficiently homogenous to be able to assess deforestation and forest degradation (Art. 2(19)).
- "Geolocation" means latitude and longitude coordinates of a plot of land using at least six decimal digits. For plots of land larger than 4 hectares, polygons (latitude and longitude points describing the perimeter of each plot) should be used (Art. 2(29)).

If production areas within a single property are sufficiently similar in terms of assessing deforestation and forest degradation, the combined area can be considered a plot of land. If this combined area is smaller than 4 hectares, latitude and longitude coordinates of the plot of land should be provided using at least six decimal digits. For plots of land larger than 4 hectares, polygons (latitude and longitude points describing the perimeter of each plot) should be used. If the production areas are dissimilar in terms of deforestation assessment, each should be considered as an individual plot of land.

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Role of existing third-party certification, national traceability, and certification systems

Third-party certification schemes addressing sustainability are already well established in most of the value chains affected (e.g. Rainforest Alliance; Roundtable on Sustainable Palm Oil (RSPO) Certified Sustainable Palm Oil). The more robust these systems become, and the more aligned with the requirements of the Regulation, the easier it will be for operators in the EU to use certification as evidence that imported commodities are compliant. The Regulation clarifies that these systems could be used by operators in the EU to fulfil their due diligence obligations. All efforts to strengthen the traceability and sustainability of commodity production, private or public, will help operators to comply with the Regulation. Further information on the role to be played by certification schemes is provided in the Commission Guidance Document (Chapter 10).

What do EU companies do with this information?

An EU company that is the *first* to place one of the listed commodities/products on the EU market must issue a due diligence statement that includes the country or countries of production, and geolocation of all plots of land (EUDR, Art. 4(2), Annex II). This statement also confirms that the EU company has undertaken due diligence, meaning that it has collected the relevant information and completed a risk assessment of the commodities/products. The EU company can only put commodities/products on the market where the risk assessment concludes there is no or negligible risk (i.e. “no cause for concern”) that the commodities were produced in a deforested area, or in a way that does not comply with relevant legislation in the producing country. The company’s specific due diligence obligations will depend on the risk status of the exporting country (see next subsection). Further downstream operators will not have to undertake due diligence or submit due diligence statements.

Benchmarking the producing countries

In May 2025, the European Commission adopted Regulation 2025/1093, which classifies countries according to three levels of deforestation risk (low, standard, and high). The country classification is available in the Annex to the Regulation. Countries not classified as low or high risk fall into the standard risk category.

This classification determines the extent of the controls that EU Member States must carry out to ensure products placed on the market comply with the EUDR (Art. 16 of the EUDR). Each year, EU national authorities must conduct checks on a small proportion of operators supplying the products concerned to the EU market:

- low-risk countries, 1% of operators
- standard-risk countries, 3% of operators
- high-risk countries, 9% of operators plus 9% of the quantity of each of relevant product.

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Operators sourcing from low-risk countries also benefit from simplified due diligence requirements. This means that, on request by the competent authority, operators only have to provide information demonstrating that there is a negligible deforestation risk linked to the products (Art. 13 of the EUDR).

The methodology used for this classification is outlined in a Commission Staff Working Document (European Commission 2025c). Countries subject to sanctions by the United Nations Security Council or the Council of the EU on imports or exports of the relevant commodities/products are automatically classified as high risk, as it is impossible to conduct due diligence along the value chains in these countries.

Further guidance for non-EU countries

The European Commission has developed the following resources to facilitate compliance with the EUDR (see Implementing the EU Deforestation Regulation, namely:

- Guidance and Frequently Asked Questions to support operators and traders, particularly small and medium-sized enterprises (SMEs)
- EUDR Compliance: Understanding your company position in beef, cocoa, coffee, palm oil, rubber, soy, and wood supply chains.

EU support for non-EU countries

The European Commission committed to engage with producing countries and regions to support an inclusive transition to deforestation-free and legal supply chains to the EU.

In December 2023, the EU and Member States launched a Team Europe Initiative on Deforestation-free Value Chains to support non-EU countries in the implementation of the regulation.

This includes the Sustainable Agriculture for Forest Ecosystems (SAFE) and a new Technical Assistance Facility.

- SAFE is co-financed by the European Commission and the German Federal Ministry for Economic Cooperation and Development (BMZ). The project aims to support smallholders in the transition to sustainable and deforestation-free value chains, and is currently operational in Brazil, the Democratic Republic of the Congo, Ecuador, Indonesia, Viet Nam, and Zambia. SAFE also supports a Hub for Deforestation-free Value Chains that provides information to stakeholders to support coordination of action in this domain.
- Managed by the European Forest Institute (EFI), the Technical Facility on Deforestation-free Value Chains collaborates with commodity-producing countries to assist in transitioning to legal and deforestation-free value chains, in line with the EUDR market requirements.

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Why?

The expansion of agricultural land to produce certain commodities is one of the main drivers of deforestation and forest degradation, which is occurring at an alarming rate, threatening biodiversity, and aggravating climate change. The EU seeks to prevent deforestation that may occur as a result of consumption of these commodities within the Union.

Timeline

For large EU operators, the due diligence obligations will apply from **30 December 2026**. For EU operators that are micro and small enterprises, the due diligence obligations will apply from **30 June 2027**.

What are the major implications for exporting countries?

Opportunities

The Regulation:

- presents an opportunity to enhance trade in deforestation-free products and boost opportunities for sustainable actors, including opportunities for social and economic empowerment of producers in sustainable supply chains and food systems
- will potentially create a fairer and more transparent market for suppliers who have invested in sustainable, forest-friendly strategies, which can contribute to improving companies' competitiveness in global markets (outside the EU) with growing consumer demand for green products
- can incentivise new business models (e.g. in the digital field) and boost opportunities for all actors in deforestation-free supply chains
- will reinforce existing initiatives to reduce deforestation in non-EU countries.

Challenges

- Smallholders, especially those in least-developed countries (LDCs), may face initial technical and financial difficulties in providing geolocation data at the point of production.
- Meeting new information and traceability requirements may be difficult, particularly for weaker economic players and complex LDC supply chains.

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- Ensuring that smallholders and complex supply chains (particularly in LDCs) maintain their place in deforestation-free value chains supplying the EU market will be important, and may require support.

Recommended Actions

Producers and exporters

Producers and exporters are advised to work together to make sure that beef, cocoa, coffee, palm oil, and soya comply with the EUDR. This includes:

- reviewing the availability of existing and appropriate technology to enable geolocation of all plots of land where the commodities are produced
- reviewing the existing capacity of exporters to collect, track, store, and transmit information on the deforestation-free and legal status of commodities/products along the supply chain
- adapting traceability and record-keeping systems for producers, especially small-scale producers, to facilitate the provision of detailed information on location, production, land management, and date or time range of production
- engaging with competent authorities to clarify the national legislation that is relevant to the production of commodities/products, including land and labour rights.

Competent authorities

Competent authorities are encouraged to:

- map out existing supply chains to the EU to identify:
  - strengths and weaknesses of specific sectors
  - existing access to relevant geolocation technology
  - existing best practices for traceability
- review the availability of tools (e.g. satellite images) that identify agricultural use before and after December 2020
- clarify (and communicate with the private sector) what national legislation is relevant for production of the commodities concerned (e.g. land-use rights, environmental protection, third parties' rights, forest-related regulations, labour rights, human rights, rights to consultation (with indigenous peoples), tax, anticorruption, trade and customs regulations)
- develop an enabling environment to support traceability and the establishment of land rights, and demonstrate the implementation of relevant national legislation

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- develop dialogue with the EU and European private sectors to explore opportunities for relevant partnerships that can support the transition towards deforestation-free and legal supply chains to the EU.

Resources

Council of the European Union (2022) Proposal for a Regulation of the European Parliament and of the Council on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 – Letter to the Chair of the European Parliament Committee on the Environment, Public Health and Food Safety (ENVI)

European Commission (2019) Communication: Stepping up EU Action to Protect and Restore the World's Forests

European Commission (2020) Commission launches global cooperation platform to fight deforestation

European Commission (2021a) Biodiversity: deforestation-free products on the EU market

European Commission (2021b) Impact assessment report minimising the risk of deforestation and forest degradation associated with products placed on the EU market

European Commission (2022) EU, Côte d'Ivoire, Ghana and the cocoa sector endorse an Alliance on Sustainable Cocoa

European Commission (2023) Regulation on deforestation- and forest degradation free supply chains [presentation]

European Commission (2025) Commission Staff Working Document: On the methodology used for the benchmarking system

European Commission (2026a) Annex to the Communication to the Commission: Approval of the updated content of a draft Commission Notice on the Guidance Document for Regulation (EU) 2023/1115 on Deforestation-Free Products (C/2025/4524)

European Commission (2026b) Frequently Asked Questions: Implementation of the EU Deforestation Regulation, Version 5

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