

EU Deforestation Regulation (EUDR): Clarifications

April 2025

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European Commission clarifies some requirements of the EU Deforestation Regulation

Commission Notice – [Guidance Document](#) for Regulation (EU) 2023/1115 on Deforestation-Free Products

[Frequently Asked Questions](#): Implementation of the EU Deforestation Regulation, Version 4 – April 2025 [download]

[Draft](#) Commission Delegated Regulation amending Regulation (EU) 2023/1115 as regards the list of relevant commodities and relevant products and Annex [download]

Update

To simplify the implementation of the European Union Deforestation Regulation (EUDR, Regulation [2023/1115](#)), the European Commission has published:

- Updated Guidance
- Updated Frequently Asked Questions
- Draft Regulation proposing some simplifications.

These clarifications are a response to issues raised by stakeholders both within the EU and in non-EU countries, particularly aimed at reducing the administrative costs for operators and authorities ([European Commission 2025](#)).

Note that AGRINFO does not cover timber and rubber. Clarifications of particular relevance to agri-food exporters in low- and middle-income countries are:

- requirements in relation to livestock feed
- legality requirements
- the EU's benchmarking of countries as being at low, standard, or high risk of deforestation
- which products do not fall under the scope of the EUDR (samples exported for testing; products such as babassu oil that fall under customs codes for “palm oil products” but are not made of palm oil).

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 the

commodities covered by the EUDR: cattle, cocoa, coffee, oil palm, 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](#).

Impacted products

Cattle, cocoa, coffee, palm oil, soybeans (these are the only agri-food products impacted by the EUDR).

What is changing?

The European Commission has clarified certain EUDR requirements by updating its Guidance and Frequently Asked Questions (FAQs). It has also published a draft Regulation proposing some simplifications.

This summary highlights clarifications of particular relevance to suppliers of agri-food products from low- and middle-income countries.

Updated Guidance

Processed products containing more than one deforestation commodity

In such cases, due diligence is only required for the commodity directly related to the product (see Annex I of Regulation [2023/1115](#)). For example, a chocolate bar may contain cocoa, cocoa butter, and palm oil, but as the relevant commodity for chocolate is cocoa, the due diligence obligations and information requirements are only required for cocoa.

Frequently Asked Questions v4 (April 2025)

Traceability

Deforestation-free commodities cannot be mixed with commodities that do not comply with the EUDR. Where deforestation-free commodities from multiple farms are mixed, the place of production declared should include the place of production of *all* raw materials that entered the silo/tank since it was last empty. If silos are not emptied regularly, a good strategy could be to declare the place of production of all the raw materials that entered the silo up to at least 200% of the silo capacity, provided that the silo works a first-in first-out system or equivalent system. The updated version of the FAQs clarifies that other approaches to storage may be possible **provided commodities from an unknown place of production or materials that do not comply with the EUDR are not mixed** (FAQ 1.17).

Cattle feed

Operators placing products from cattle on the EU market must ensure that any product used to feed cattle that falls under the scope of the EUDR (e.g. soybean flour and meal) is deforestation-free. No geolocation information is required in relation to the feed itself (FAQ 1.26.1).

Legality requirements

Companies responsible for due diligence must ensure that deforestation commodities have been produced in accordance with relevant national laws – that is, laws that specifically impact or influence the legal status of the land where deforestation commodities are produced. This may include trade and customs laws if, for example, certain specific agricultural documents need to be supplied at customs as part of that country's trade laws.

If a commodity is produced in one country but processed in another country, only the legal requirements in the country of production, not the country of processing, are relevant (FAQ 3.3).

If farmers are legally allowed to sell their product under national laws, this would meet the legality requirement. If possession of the land title is not required under domestic law, that it is not required under the EUDR (FAQs 1.10 and 1.29.1).

Benchmarking

The EU is due to begin categorising countries according to their deforestation risk by **30 June 2025** (see [EU Deforestation Regulation: Engagement with non-EU countries](#)). Benchmarking is based on the latest available data, primarily from the [Global Forest Resources Assessment](#) by the Food and Agriculture Organization (FAQ 6).

The FAQs also clarify topics relevant to EU agri-food operators, including the digital information system and management of due diligence statements (FAQ 7) and the EU Observatory on deforestation (FAQ 9.10).

Draft Regulation

The draft Regulation clarifies that the following do not fall under the scope of the EUDR and therefore do not require a due diligence statement:

- samples of products sent to the EU to be tested for quality or food safety by potential buyers, which are used up during testing and do not enter the market
- packaging materials made of wood that are simply used to support, protect, or carry products placed on the EU market
- manuals, leaflets, catalogues, and marketing materials that accompany products
- products that fall under the customs codes for “palm oil products” but are not made of palm oil (*Elaeis* spp.), e.g. babassu oil (which is *Attalea* spp.)

- letters and documents accompanying consignments [“items of correspondence” defined in Regulation 2015/2446, Art. 1(26)].

Why?

Feedback from stakeholders, both within the EU and in non-EU countries, has highlighted the need to clarify certain aspects of the Regulation.

Timeline

This Regulation simplifying some aspects of the EUDR is likely to be adopted in the second or third quarter of 2025.

Recommended Actions

The EU's [Have Your Say](#) consultation closed on 13 May 2025.

Background

The EUDR, published in 2023, responds 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 indirectly contributes to deforestation, the EU aims to curb this practice and reduce the associated greenhouse gas emissions and biodiversity loss. The EUDR 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 (see [EU Deforestation Regulation](#)).

Resources

European Commission (2025) [Commission takes action to simplify the implementation of the EU Deforestation Regulation](#). Press release, 15 April.

Sources

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