

EU Deforestation Regulation (EUDR): Clarifications May 2026

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European Commission proposes to clarify which products must meet EUDR requirements, and publishes updated Guidance and FAQs

[Draft](#) Commission Delegated Regulation amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products [*scroll down the EU webpage to download the draft*]

[Draft](#) Annex [*scroll down the EU webpage to download the draft*]

[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)

[Frequently Asked Questions](#): Implementation of the EU Deforestation Regulation Version 5 – April 2026

Update

The European Commission proposes to clarify which products must meet the requirements of the EU Deforestation Regulation (EUDR, Regulation [2023/1115](#)).

In the case of **agri-food**, these are products derived from cattle, cocoa, coffee, palm oil, and soya. The Commission proposes adding certain products including soluble coffee and frozen cattle tongues. It also clarifies that where products can potentially be *derived* from palm oil or other similar commodities, only those *produced* from palm oil have to meet EUDR requirements. Packaging derived from wood that is used to protect agri-food products in transport; marketing materials and correspondence accompanying consignments; and product samples exported to the EU for quality testing, are explicitly excluded from the scope of the EUDR.

The Commission has also published updated [Guidance](#) and revised [Frequently Asked Questions](#) providing further explanations, in particular on the EUDR simplifications adopted in 2025 (see [Review of EU Deforestation Regulation: simplification](#)).

Impacted products

Cattle, cocoa, coffee, palm oil, soya and derived products

What is changing?

Draft Regulation – clarification of which products must comply with the EUDR

The European Union (EU) is proposing changes to which products must comply with the requirements of the EUDR (Regulation [2023/1115](#), Annex I). The proposed changes relevant to agri-food products (CN Customs chapters 1–23) are as follows.

Additions

The following products are proposed to be included within the scope of the EUDR:

- frozen cattle tongues (CN code ex 0206 21 00) (where “ex” means that only the specifically named product within the broader customs category is affected).
- soluble coffee (2101 11 00)
- palm, palm kernel, and babassu oils and their fractions
 - partly or wholly hydrogenated, inter-esterified, re-esterified, or elaidinised, whether or not refined, but not further prepared (ex 1516 20)
 - boiled, oxidised, dehydrated, sulfurised, blown, polymerised by heat in vacuum or in inert gas or otherwise chemically modified (excluding those of heading 1516); “inedible mixtures or preparations of animal, vegetable, or microbial fats or oils or of fractions of different fats or oils of this chapter, that contain or have been made using oil palm” (ex 1518 00)
- crude glycerol, glycerol waters, and lyes that have been produced using oil palm (ex 1520 00).

Clarifications

The EUDR currently covers **all** products falling under the categories:

- 1207 10 – palm nuts and kernels
- 1511 – palm oil and its fractions, whether or not refined, but not chemically modified
- 1513 21 – crude palm kernel and babassu oil and their fractions, whether or not refined, but not chemically modified
- 1513 29 palm kernel and babassu oil and their fractions, whether or not refined, but not chemically modified (excluding crude oil).

However, some products falling under these categories may not come from oil palm, which is the commodity targeted by the EUDR; “ex” will be added before each of these categories to indicate that only the products from oil palm must fulfil EUDR requirements.

Exclusions

The proposal explicitly excludes the following from having to comply with EUDR requirements:

- samples of products used for examination, analysis, and testing (e.g. to assess the quality of products from suppliers)
- packing materials used exclusively to support, protect, or carry agri-food products
- correspondence and marketing materials that accompany agri-food products.

Guidance – legality requirements

The EUDR takes a flexible approach to the legality requirements under Article 2(40) by listing a number of areas of law without specifying particular laws, as these differ from country to country and may be subject to amendments. However, the guidance makes it clear that only the applicable laws concerning the **legal status of the area of production** are relevant.

The European Commission has updated its [Guidance](#) to reflect the amendments to the EUDR made in 2025, notably on the definitions of “downstream operators” and “micro- or small primary operators” and their obligations (sections 2 and 4) (see [Review of EU Deforestation Regulation: simplification](#)).

The latest clarifications on legality (section 6) that are relevant to non-EU suppliers are summarised as follows.

- The Commission plans to establish a repository of relevant legislation by December 2026. Producing countries will be able to provide a list of legislation which operators can use to demonstrate that they meet the requirements to produce in line with national rules (EUDR “legality requirements”).
- Operators can use a range of information sources to demonstrate that commodities have been produced in line with a country’s relevant legislation.
- If there is considered to be only a negligible risk of not complying with the EUDR legality requirements, it is not necessary to collect comprehensive documentation for each individual plot of land (e.g. individual land titles or exhaustive lists of legal documents). An operator can use publicly available information related to the area of production/supply chain.
- In-depth data collection is only required where the operator identifies a high risk of non-compliance (Art. 3(b)).
- Documents that are relevant for demonstrating compliance include:
 - official documents (e.g. administrative permits issued by country authorities)

- documents showing contractual obligations and information issued by public and private certification schemes
- judicial decisions
- impact assessments, management plans, environmental audit reports.

Frequently Asked Questions

The European Commission has updated its [Frequently Asked Questions](#) document aimed at helping stakeholders to implement the EUDR. The latest version reflects the 2025 simplifications produced in relation to “downstream operators” and “micro- or small primary operators”. In addition, it clarifies the following points.

- Products not in the scope of the EUDR, but containing in-scope products (section 3.14). Products that are not listed in Annex I of the EUDR, but may contain products that are in Annex I, do not need to meet EUDR requirements. Some examples are sausages and similar meats (HS 1601); bread, pastry, cakes, biscuits containing cocoa (HS 1905 90); and coffee beverages and other coffee-based preparations (HS 2202 99).
- Cooperatives/associations (section 3.20). A cooperative or association in a non-EU country can put products on the EU market on behalf of its members. In doing so, it is considered an operator and must submit a due diligence statement in the same way as other operators.
- Tools for assessing geolocation data (section 9.10.6). The revised version highlights forest maps allowing operators to cross-check geolocation data:
 - FAO (2025) Whisp: What's in that plot?
 - GFW (2025) Global Forest Watch Pro
 - JRC (2025) Geospatial analysis tools

Why?

Following responses to previous consultations, this proposed Regulation aims to clarify which products are included within the scope of the EUDR, particularly regarding derived products, and does not represent a significant change to the aims or scope of the EUDR.

Timeline

For large EU operators, the EUDR 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?

The draft Regulation clarifies which products fall under the scope of the EUDR rules, but does not change the basic requirements of the EUDR. Suppliers must provide importers with geolocation data for the plots of land where commodities are produced, and information demonstrating that commodities were produced in line with relevant national laws. They must also ensure that this data and information can be passed through the supply chain.

Recommended Actions

The European Commission's [Have your say](#) consultation on this draft Regulation closed on 1 June 2026.

Background

The EUDR sets out obligations regarding products related to cattle, cocoa, coffee, palm oil, rubber, soya, and wood. It requires EU importers to ensure there is no risk (or negligible risk) that the production of these commodities has contributed to deforestation, or that products were illegally produced according to national law. For a summary of these requirements and implications for suppliers, see the AGRINFO Guidance [The EU Deforestation Regulation: Requirements for Stakeholders outside the European Union](#).

The EUDR was originally intended to apply from 30 December 2024, but was postponed first to 30 December 2025, and subsequently to 30 December 2026 (see [Review of EU Deforestation Regulation: simplification](#)).

Resources

European Commission (2026) [Staff Working Document](#) accompanying the document Commission Delegated Regulation XXX amending Regulation (EU) 2023/1115 the European Parliament and of the Council as regards the list of relevant commodities and relevant products [download]

FAO (2025) [Whisp: What's in that plot?](#) Rome: Food and Agriculture Organization.

GFW (2025) [Global Forest Watch Pro](#). Washington, DC: World Resources Institute.

JRC (2025) [Geospatial analysis tools supporting the risk assessment of the Regulation on deforestation-free supply chains: A guide to visualize and interact with GFC2020 using the JRC IMPACT: toolbox and other applications](#)

Sources

[Draft](#) Commission Delegated Regulation amending Regulation (EU) 2023/1115 as regards the list of relevant commodities and relevant products [*scroll down the EU webpage to download the draft*]

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