

## GUIDANCE

# The EU Deforestation Regulation

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REQUIREMENTS FOR  
STAKEHOLDERS OUTSIDE  
THE EUROPEAN UNION

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# 1. Introduction

The EU Deforestation Regulation (EUDR, Regulation [2023/1115](#)) obliges **importers**<sup>1</sup> of certain commodities (cattle, cocoa, coffee, palm oil, soya, rubber, and wood) and related products to exercise “due diligence”. This means they are required to collect and analyse information from their suppliers that enables them to demonstrate that the produce entering the EU market is “deforestation-free” and is “produced in compliance with relevant national laws”. This obligation will apply to importers from 30 December 2025.

*From 30 December 2025, the EUDR will oblige importers to the European Union of cattle, cocoa, coffee, palm oil, soya, rubber, and wood to collect information from their suppliers on the deforestation impacts of produce entering the EU market.*

*Stakeholders in non-EU countries – producers, processors, exporters, and intermediaries – will be affected only indirectly, by having to provide additional information to the importers.*

The vast majority of stakeholders in non-EU countries who supply these products to the EU – **producers, processors, exporters, and intermediaries** – are not themselves importers. This means that they are affected only indirectly, by having to provide additional information to the importers. The EU’s detailed due diligence requirements and information systems will not be of direct practical relevance to them.

This guidance therefore focuses only on aspects of the EUDR that are of direct relevance to non-EU actors supplying the EU, with an emphasis on agri-food products (excluding rubber and wood). It summarises information provided by the European Commission’s updated guidance and FAQs (European Commission [2025a](#), [2025b](#)).

The Commission has categorised non-EU countries into low, standard, and high risk in relation to their capacity to supply deforestation-free products (see [EU Deforestation Regulation: Engagement with non-EU countries](#)). Again, this directly impacts only the **importers**, as it affects the amount of information they will have to provide, and the number of controls that will be applied by the EU authorities. It does not affect the requirements that apply to suppliers from outside the EU, whatever the non-EU country’s risk category .

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<sup>1</sup> The importer is the operator responsible for completing the customs procedure when bringing the products into the European Union, whether this business is based within or outside the EU.



## 2. Collecting geolocation data

Agri-food commodities and related products imported into the EU that are covered by the EUDR –that is, cattle meat, cocoa, coffee, palm oil, and soya –must be produced on a plot of land where there has been no deforestation after **31 December 2020**. A forest is defined in the EUDR as “land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10%, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use” (Regulation [2023/1115](#), Art. 2.4).

This means that each plot of land where these commodities have been produced must be identified through geographic coordinates. This geolocation data must be passed from the producer to the next operator in the supply chain.

The geolocation coordinates of a plot of land can be collected via mobile phones, hand-held [Global Navigation Satellite System](#) (GNSS) devices, and widespread free-to-use digital applications such as geographic information systems (GIS). These do not necessarily require mobile network coverage.

If the production area does not change, geolocation data only has to be collected once. The EUDR does not require personal information (such as the name of the producer) to be linked to the geolocation data.

## 3. Measuring plots of land

### Cocoa, coffee, palm oil, and soya

#### Plots larger than 4 hectares

Producers of cocoa, coffee, palm oil, and soya must indicate the size of the plot on which the commodities were grown by providing geographical coordinates called “polygons”. Each coordinate is made up of two points, one latitude and one longitude. A polygon perimeter consists of at least four coordinate pairs, and represents the area they enclose. To ensure accuracy, each coordinate must be recorded with at least six decimal digits (digits after the point), e.g. 49.004616, 22.734318.

There are different ways of measuring these coordinates. Mobile agricultural apps can record plot boundaries (on a hand-held GPS or smartphone) by walking the perimeter of the plot. These generally do not require an internet connection; the data can be stored on the app and synchronised later. Another option is to work online by drawing plot boundaries onto satellite images or maps to obtain geographic data.

Polygons marking the plots of land must:

- not overlap
- not have holes in the middle
- make a closed perimeter (the first coordinate pair should be the same as the last)
- not have duplicate coordinates at six decimal digits.

A polygon must correspond to one plot of land where the commodity has been produced. It cannot be a large area which includes several plots of land, or areas of land on which the commodity is not grown.

The geographical designation of a plot does not require the producer to have a property title or a land registry for the land.



### Plots less than 4 hectares

Producers of these commodities can describe a plot of land less than 4 hectares using a single geolocation coordinate point (latitude and longitude), although additional coordinate points could help buyers to undertake checks. This can be captured using a mobile app in the field.

## Cattle-related products

For these products, all the **establishments** where the cattle have been held must be provided – birthplace, farms where they were fed, grazing lands, and slaughterhouses. Each of these locations can be described using a single geolocation coordinate. Operators should ensure that the feed used for livestock is deforestation-free. However, no geolocation information is required for the feed itself (see FAQ 1.26.1, European Commission [2025b](#)). Geolocation data does not need to be provided in relation to cattle born before 29 June 2023 (the date that the EUDR entered into force).

## 4. Recording the date of production

In addition to geolocation data, information must be passed down the supply chain on the date or time range of production:

- date of production: harvest date
- time range of production: duration of the production process.

If specific information is not available, the crop year and/or harvesting season could be used.

For cattle-related products, the time range of production refers to the lifetime of the animal from birth until the time of slaughtering.

## 5. Passing on data

As a product moves through the supply chain, geolocation data and information on the date of production must also be passed on. This means that all actors along the chain (from production onwards) must:

- ensure data is in a form that can be used by downstream users
- have access to appropriate digital tools and software/hardware
- have the knowledge and data management skills needed to collect and pass on the required data.

Geolocation data can be collected in various file formats, e.g. GeoJSON files (see European Commission [2025c](#)), csv, KML, shapefiles. The importer must submit data in GeoJSON format (which visualises points and polygons); there are systems for converting files received in other formats into the GeoJSON format.



## 6. Traceability and segregation

### No mixing of deforestation-free and non-deforestation-free commodities

Produce that meets EUDR requirements (with geographic coordinates for the area of production) cannot be mixed with produce of unknown origin, or that is sourced from areas deforested after 31 December 2020. EUDR compliant produce imported into the EU therefore must be segregated from produce of unknown origin or from non-deforestation-free sources at every step of the supply chain.

“Mass balance” chains of custody, which allow for the mixing of produce at any step of the supply chain, are not allowed under the EUDR because they cannot guarantee that the commodities imported into the EU market are deforestation-free. It is therefore not possible, for example, to have a silo of produce from mixed sources where there is data for only 50% of the contents, and then to put any of the produce on the EU market as deforestation-free.

### All commodities must be linked to deforestation-free plots

All the produce making up a consignment must be linked to one or several plots of land that have been established as deforestation-free after 31 December 2020 (with the required data).

Produce that is deforestation-free (with the required geolocation data) can be mixed in a silo or tank **with other deforestation-free produce**. All or part of that silo can then be shipped to the EU market. If a consignment is made up of the entire silo or tank, the geolocation data provided would be the place of production of **all** the goods that entered the silo. If the silo is regularly emptied, the geolocation data provided should represent a quantity greater than the size of the silo (“a minimum of 200% of the silo capacity”, FAQ 1.17, European Commission [2025b](#)). In this scenario, the importer will “declare in excess”; this means they will provide geolocation data for all plots of land linked to the produce that has passed through the silo or tank, and therefore represent a quantity of produce larger than the consignment.

### Traceability tools

A wide range of traceability tools have been developed that may help actors to track products along the supply chain. The EUDR does not impose or recommend a specific type of traceability solution, but a number of important considerations have been identified. The tool should be:

- fit for purpose –usable by all operators (allow data recording in remote settings, protect data ownership)
- affordable for smallholders
- able to evolve in response to the needs of operators
- interoperable – designed to work with various geolocation systems and integrate with tools such as [Collect Earth Online](#) for visual validation.

Further guidance on selecting traceability solutions can be found in Annex 1 of *Navigating traceability and the EUDR* ([GIZ 2024](#)). An overview of selected technology solutions is provided in Annex 4 of *Navigating EUDR Due Diligence Obligations: Module 5* ([ITC 2024](#)).





## 7. Legality

The commodities covered by the EUDR must be “deforestation-free” and produced in compliance with relevant national laws (see FAQ 3.3, European Commission [2025b](#)). This means that producers must comply with the following national and regional legislation:

- land use rights
- environmental protection
- third party rights
- labour rights
- human rights protected under international law
- the principle of free, prior, and informed consent
- tax, anti-corruption, trade, and customs standards.

Demonstrating legal compliance is the **responsibility of the importers** who are bringing the commodities into the EU market. Producers do not have to systematically provide information proving compliance with national laws in the same way as geolocation data. However, exporters or traders in the producing country may be asked to provide information (such as copies of laws or official documents from public authorities) to help importers demonstrate compliance.

It is therefore advisable for stakeholders in the exporting country to work together and engage with their public authorities to determine which national laws are relevant, and to collect information demonstrating compliance with those laws.

## 8. Country categorisation

In May 2025, the European Commission assigned non-EU countries to three lists according to their capacity to supply products that are deforestation-free (Regulation [2025/1093](#)).

This categorisation is primarily based on data from the UN Food and Agriculture Organisation’s [Global Forest Resources Assessments](#), which provide a fair and objective reference point for establishing the risk of deforestation by looking at net forest loss, level of deforestation, and the causes of deforestation. For the methodology used see European Commission ([2025d](#)).

The Commission envisages a first review of the current categorisation in 2026 (European Commission [2025d](#), p. 2).

### High risk countries

Belarus, Democratic People’s Republic of Korea, Myanmar, Russian Federation.





## Low risk countries

Afghanistan, Albania, Algeria, Andorra, Antigua and Barbuda, Armenia, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belgium, Bhutan, Bosnia and Herzegovina, Brunei Darussalam, Bulgaria, Burundi, Cabo Verde, Canada, Central African Republic, Chile, China, Comoros, Congo, Costa Rica, Croatia, Cuba, Cyprus, Czechia, Denmark, Djibouti, Dominica, Dominican Republic, Egypt, Estonia, Eswatini, Fiji, Finland, France, Gabon, Georgia, Germany, Ghana, Greece, Grenada, Guyana, Hungary, Iceland, India, Iran (Islamic Republic of), Iraq, Ireland, Italy, Jamaica, Japan, Jordan, Kazakhstan, Kenya, Kiribati, Kuwait, Kyrgyzstan, Lao People's Democratic Republic, Latvia, Lebanon, Lesotho, Libya, Liechtenstein, Lithuania, Luxembourg, Madagascar, Maldives, Mali, Malta, Marshall Islands, Mauritius, Micronesia, Monaco, Mongolia, Montenegro, Morocco, Nauru, Nepal, Netherlands, New Zealand, North Macedonia, Norway, Oman, Palau, Palestine, Papua New Guinea, Philippines, Poland, Portugal, Qatar, Republic of Korea, Republic of Moldova, Romania, Rwanda, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, San Marino, São Tomé and Príncipe, Saudi Arabia, Serbia, Seychelles, Singapore, Slovakia, Slovenia, Solomon Islands, South Africa, South Sudan, Spain, Sri Lanka, Suriname, Sweden, Switzerland, Syrian Arab Republic, Tajikistan, Thailand, Timor-Leste, Togo, Tonga, Trinidad and Tobago, Tunisia, Türkiye, Turkmenistan, Tuvalu, Ukraine, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United States of America, Uruguay, Uzbekistan, Vanuatu, Vietnam, Yemen.

## Standard risk countries

All those countries not listed as either high or low risk countries.

## Impacts of country categorisation

It is important to note that the categorisation of a country does **not** affect the specific requirements on non-EU suppliers of deforestation commodities. Regardless of the country's risk categorisation, all suppliers must provide the same standard information to support importers' due diligence obligations: geolocation data, information on date/time of production, and any information required to demonstrate that production complies with national or regional laws.

Country categorisation does have a direct impact on **importers'** obligations:

- standard and high risk countries – importers must carry out a risk assessment to ensure there is no or negligible risk of deforestation related to products, which they must provide on request to competent authorities, and must update every year
- low risk countries – importers do not have to undertake a risk assessment, but on request must provide documentation to competent authorities demonstrating that there is a negligible risk that the product is mixed with products from standard or high risk countries or with products of unknown origin.

The frequency of controls on deforestation commodities undertaken by EU control bodies is also different according to the country categorisation:

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



Suppliers in standard risk and high risk countries may have concerns about potential reputational damage from these categorisations. However, importers will continue to source commodities from standard risk and high risk countries if they have information giving them confidence that there is no or a negligible risk that products are non-compliant. Suppliers in standard risk or high risk countries should therefore work collectively to gather and clearly communicate information that can help demonstrate to EU importers the negligible deforestation risk associated with the country or region where the products are produced.

## 9. Resources

European Commission (2025a) [Guidance document for Regulation \(EU\) 2023/1115 on deforestation-free products.](#)

European Commission (2025b) Frequently Asked Questions: Implementation of the EU Deforestation Regulation. Version 4. [download]

European Commission (2025c) [EUDR GeoJson File Description.](#) [download]

European Commission (2025d) [Commission staff working document on the methodology used for the benchmarking system.](#) [download]

GIZ (2024) [Navigating traceability and the EUDR: A guiding document for establishing inclusive and effective traceability solutions.](#) Deutsche Gesellschaft für Internationale Zusammenarbeit.

ITC (2024) [Deforestation-free Global Value Chains: Navigating EUDR Due Diligence Obligations. Module 5: Technology solutions in context of EUDR.](#) International Trade Centre.



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