

The EU Deforestation Regulation

What it actually requires, in eight slides. For small and mid-sized companies in forestry, wood products and agrifood.

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What it is

An EU law that bans placing products on the EU market, or exporting them, when they are linked to deforestation.

It covers seven commodities and the products made from them — furniture, paper, chocolate, beef, tyres and much else. Packaging counts only when it is sold as a product in its own right, not when it wraps something else.

Cattle**Cocoa****Coffee****Oil palm****Rubber****Soya****Wood**

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Every product must pass two tests

Deforestation-free. Not produced on land deforested after 31 December 2020. For wood, the land must also not have been degraded after that date.

Legally produced. Made in compliance with the laws of the country of production — land rights, environmental and labour law, trade and customs rules.

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31 December 2020 is the line

Land cleared before that date is not a problem. Land cleared after it makes everything grown on it non-compliant, permanently.

The cut-off does not move when the deadlines move. It has been fixed since the regulation was written — which is why proving *where* material came from matters more than when you bought it.

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Due diligence has three steps

1 Collect the information

Where it came from, who supplied it, how much, and evidence it was produced legally.

2 Assess the risk

How likely is it that this material came from land cleared after the cut-off, or was produced unlawfully?

3 Mitigate the risk

If the risk is more than negligible, act before the product moves — better data, audits, or a different supplier.

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The data is the hard part

If you are an upstream operator, you need the geolocation of every plot the material came from, the country of production, the quantity, your supplier details, and evidence of legal production.

Geolocation is what catches companies out. It is plot-level, not country-level, and in most supply chains it does not exist yet. Downstream operators and traders never collect it — which is why establishing your role comes first.

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The due diligence statement

When the due diligence is done, the operator files a due diligence statement (DDS) in the EU Information System — before the product is placed on the market or exported.

Each statement gets a reference number. The operator passes it to its first buyer, who keeps it five years. It is not passed further down the chain.

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Not every country is treated alike

The Commission classifies countries as low, standard or high risk. Sourcing from a low-risk country allows a simplified form of due diligence and attracts fewer checks.

It does not remove the obligation. You still collect the information and keep the records — it is the risk assessment step that gets lighter.

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When it applies to you

Large and medium companies	30 Dec 2026
Micro and small, already covered by the EU Timber Regulation	30 Dec 2026
Micro and small, everyone else	30 Jun 2027

The EU Timber Regulation line is the one companies get wrong. It puts most timber and wood-product SMEs on the December date.

Unsure where to start?

Most of this turns on one question: what is your role in the supply chain? Get that right and the rest becomes a work plan rather than a panic.

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