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## Information for customers on the EU Deforestation Regulation (EUDR)

Declaration issued by (company): \_\_\_\_\_

Declaration issued for (company): \_\_\_\_\_

From 30 December 2024, the EU Deforestation Regulation (EUDR) will affect all companies that import, export or trade relevant wood products within the EU.

We hereby confirm that our company complies with the EUDR. For relevant products that we place on the EU market for the first time starting from 30.12.2024, we will provide you with all the data you require in accordance with EUDR Article 4 (9) to ascertain the proper exercise of due diligence in our company. In doing so, we will be guided by the recommendations of the German Timber Trade Federation (GD Holz).

Further information:

There is currently still a lack of clarity in some areas regarding the exact implementation of the EUDR in practice. At the same time, there are countless letters circulating in the industry whose requirements go far beyond the specifications of the EUDR. Based on the text of the regulation, the FAQ from the EU Commission, statements from the EU Commission in the EUDR Multi Stakeholder Platform and statements from the German Federal Ministry of Food and Agriculture (BMEL), we have summarised the current status for you here:

- The EUDR must be applied from 30 December 2024 (source: EUDR).
- The extended transitional period for small companies until 29 June 2025 only applies to products that were not affected by the EU Timber Regulation (EUTR). It is therefore not relevant in the timber sector in most cases (source: EUDR).
- Operators (importers, European forest owners, downstream non-SME companies and exporters) must submit due diligence statements for relevant products that they place on the EU market for the first time from 30 December 2024 (source: EUDR).
- The due diligence statement involves entering certain data into the EU information system. It is not an official document that can be passed on within the supply chain. It is not intended for suppliers to complete letters from their customers - these are not due diligence statements within the meaning of the EUDR (source: EUDR).
- Operators must pass on the reference numbers associated with the relevant products as well as proof that the EUDR has been fulfilled (source: EUDR).
- In contrast to Operators, traders within the meaning of the EUDR are not obliged to pass on data to their customers. To enable smooth implementation of the EUDR, it is recommended that traders also pass on data (source: EUDR).
- The disclosure of reference numbers and evidence is only required for products consisting of raw materials placed on the EU market for the first time from 30 December 2024 (source: EUDR).
- Relevant products that were already placed on the EU market for the first time before 30 December 2024, as well as relevant products manufactured from them, are not affected by the

EUDR. Only proof of placing on the market before 30 December 2024 must be passed on. Sensitive data may be blacked out on such documents. It is neither possible nor necessary to pass on reference numbers etc. (source: FAQ of the EU Commission).

- The following criteria must be met for a product to be affected by the EUDR (*relevant product* within the meaning of the EUDR):
  - The HS Code of the product is mentioned in Annex I of the EUDR **and**
  - The product contains relevant raw materials (e.g. wood) (source: EUDR).
- Companies that purchase packaging wood or cardboard within the EU and use it to package products that are not covered by the EUDR are not operators according to the EUDR. The EUDR does not have to be applied to this packaging, no information regarding the EUDR is required and no due diligence statements must be submitted (source: BMEL statement).
- Companies that purchase relevant products within the EU and process them into products that are not affected by the EUDR are not operators according to the EUDR. They do not have to apply the EUDR (source: BMEL statement).
- Large downstream companies must ascertain that the EUDR has been fulfilled for the relevant products they have purchased. For this purpose, the supplier's due diligence system and its application must be checked. This can be carried out, for example, as part of annual written audits. It is neither necessary nor intended that customers repeat the due diligence obligations of their suppliers (source: statement by the EU Commission).
- It is not necessary for suppliers from the EU to pass on geodata, supply chain documents or other data not relevant for the submission of a due diligence statement or the ascertainment of the fulfilment of the due diligence obligation to their customers (source: statement of the EU Commission).

You can find the text of the Regulation here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115>

You can find the FAQ document of the EU Commission here: [https://green-business.ec.europa.eu/deforestation-regulation-implementation\\_en#frequently-asked-questions](https://green-business.ec.europa.eu/deforestation-regulation-implementation_en#frequently-asked-questions)

This document reflects the status as of September 2024 and is updated regularly. Despite careful research, we cannot guarantee the accuracy of the information provided due to the complexity of the topic. In case of doubt, please contact your competent authority.

GD Holz Service GmbH has prepared its own FAQ document on the practical implementation of the EUDR. This will be published as soon as the EU Commission has clarified points that are still unclear. We will inform you as soon as this FAQ is available.

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Date

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