
Information for customers on the EU Deforestation Regulation (EUDR)

Declaration issued by (company): _____

Declaration issued for (company): _____

The EU Deforestation Regulation (EUDR) will apply from 30 December 2026 to all companies that import (place on the Union market), export, or trade relevant wood products.

The EUDR text was amended in late 2025 in order to reduce the burden on companies buying and selling within the EU. As a result, the requirements for companies within the EU have largely been removed. For companies that do not import themselves, the following requirements apply:

- **Operators** (= importers or forest owners) must pass on the reference numbers relating to the products they place on the market to their customers. No further information needs to be provided (EUDR FAQ 3.4).
- **Customers of operators** must document reference numbers. It is sufficient, for example, to archive invoices or delivery notes on which the reference numbers are printed. The EUDR does not require reference numbers or any other data to be entered into customers' portals or databases (EUDR Article 5).
- **Only operators** are subject to due diligence obligations and must submit due diligence statements. Apart from reference numbers, operators are not required to provide any further information (EUDR FAQ 5.1).
- Companies in the downstream supply chain (= companies that come after the operator in the supply chain) are **not required to verify** whether their suppliers are operators or not, nor are they required to proactively request reference numbers from their suppliers. If they receive a reference number from their supplier, they must store it. If they do not receive a reference number, no further investigation is required unless it is obvious that the supplier is an operator (EUDR FAQ 3.4).
- Companies in the downstream supply chain **do not require geocoordinates or any other evidence or information** (EUDR FAQ 1.1). They ensure traceability within the supply chain by collecting the names and addresses of their suppliers and customers. They are not required to pass on any information to their customers (EUDR FAQ 1.2, 3.4).
- There is no obligation to pass on the verification number of the due diligence statement in addition to the reference number. Companies in the downstream supply chain generally do not need this information (EUDR FAQ 3.6.1).
- **Only in cases of substantiated concerns** are large downstream companies required to verify whether the due diligence obligation has been fulfilled by the operator. However, suppliers are not obliged to provide the relevant information. If a downstream company that does not purchase directly from an operator does not receive sufficient information, it is sufficient for the company to inform the competent authority about the matter and provide it with all available information. These requirements do not apply to downstream small and medium-sized enterprises. In cases of substantiated concerns, these companies are only required to inform the competent authority. (EUDR FAQ 3.6.2).

- According to the EUDR, “substantiated concern” is defined as a “*duly reasoned claim based on objective and verifiable information regarding non-compliance with this Regulation and which could require the intervention of competent authorities;*” (EUDR Article 2).
- Companies in the downstream supply chain **cannot submit due diligence statements** or generate their own reference numbers. Corresponding requests from customers are therefore unfounded (EUDR FAQ 3.10.1).
- It is possible that operators deliver goods covered by several due diligence statements and must therefore pass on **several reference numbers**. This is in line with the requirements of the EUDR. There is **no obligation** to consolidate several reference numbers into one (EUDR Article 5).
- Downstream companies wishing to export wood products to a country outside the EU are not required to apply a due diligence system or submit a due diligence statement. They **do not need a reference number for export**. Instead, they may indicate the corresponding TARIC certificate code when exporting (EUDR FAQ 5.6.1).
- When **re-importing** products into the EU that were made from wood previously exported from the EU, **no reference number is required**. Instead, the “conventional reference number” provided by the European Commission for such cases may be used (EUDR FAQ 5.4).

Regardless of this, we hereby confirm compliance with the EUDR within our company. For all relevant products that we **place on the Union market for the first time** from **30 December 2026**, we will provide you with the corresponding reference numbers.

For products we purchase ourselves within the EU, the passing on of reference numbers is neither required nor possible. Downstream companies, regardless of their size, require reference numbers only if they purchase directly from an operator (i.e., an importer or forest owner).

In the event of substantiated concerns, we will inform you as well as the competent authorities and provide you with the documentation required to verify compliance with due diligence obligations. In doing so, we will follow the recommendations of the German Timber Trade Federation (Gesamtverband Deutscher Holzhandel e.V, GD Holz).

Date

Company stamp, signature

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