Grown in Britain
EUDR Compliance Guidance

The EU Regulation on Deforestation-Free Products (EUDR) requires that companies placing products on the EU market do not source products associated with deforestation or forest degradation.

The regulation came into force on 29th June 2023 and has 2 key deadlines for compliance:

- 30th December 2025 for large operators.
- 30th June 2026 for small and micro-operators.

However, the European Commission have proposed a change in these timescales which will need to be agreed by the European Parliament and the Council by the end of the year. Find out more about the proposed changes here:
https://ec.europa.eu/commission/presscorner/detail/da/ip_25_2464

This module is **only** designed for Grown in Britain certified supply chains, where all timber and timber products are sourced from woodlands and forests in England, Wales, Scotland and Northern Ireland.

Definitions

Forest - a piece of land spanning more than 0.5 ha containing trees higher than 5m and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land which is predominantly under agricultural or urban land use.

Deforestation – the conversion of forest into land destined for agricultural use, whether human induced or not.

Deforestation-free – something produced on land free of deforestation after 31st December 2020 (and, for wood products, also free of forest degradation). This applies to both legal and illegal deforestation.

Forest degradation – structural changes to forest cover, taking the form of conversion of:

- Primary forests or naturally regenerating forests into plantation forests or into other wooded land.
- Primary forests into planted forests.

Small or medium-sized enterprises (SMEs) – companies which, at the balance sheet date, do not exceed the numerical limits of at least two of the following three criteria:

- A balance sheet total of EUR20 million.
- Net sales of EUR40 million.
- Average number of employees during the financial year <250.

Operators – the company or individual first placing the product on the EU market, or exporting it from the EU

Requirements of EUDR

Whilst the UK is not in the EU, EUDR applies where timber or timber-based products are placed on the EU market. If you are a GiB-F or GiB-COC certificate holder, you may be asked to provide information to your supply chain to demonstrate that the timber or timber products you are supplying comply with the requirements of EUDR. For businesses placing product directly on the EU market, there is a legal requirement under EUDR to upload a Due Diligence Statement (DDS) to the EU's centralised TRACES system before products can clear customs or be placed on the EU market.

Due Diligence System

For businesses that are placing product on the EU market, a due diligence system must be in place. The due diligence system must include:

- Data collection/information gathering – collecting information from every supplier about the relevant products subject to the EUDR

Note: The UK has been benchmarked as a 'low risk' country and as such, the requirements for due diligence are simplified. There are more rigorous requirements for the due diligence system that are required for countries benchmarked as 'standard risk' or 'high risk'. However, operators will need to demonstrate that they have evaluated the complexity of the supply chain to establish the risk of the EUDR being circumvented and/or the risk of mixing with products of unknown origin or with products from high risk or standard risk countries.

Due Diligence Statement

For each supplier of timber or timber-based product the following information must be gathered and kept for 5 years:

- Product description including trade name and full scientific name of species being supplied.
- Quantity in kg being supplied.
- HS code[1] of product being supplied.
- Country of production and geolocation of all plots of land where the commodity was produced[2].
- The name, postal address and email address of any business or person who has supplied you with the relevant products.
- The name, postal address and email address of any business, operator or trader to whom the relevant products have been supplied.
- Adequately conclusive and verifiable information that the relevant products are deforestation free.
- Adequately conclusive and verifiable information that the relevant commodities have been produced in accordance with the relevant legislation of the country of production. Note: Your Grown in Britain certification can be used as part of this evidence but must be backed up by your own due diligence systems.

[1] https://www.gov.uk/trade-tariff

[2] (For plots of land of more than 4 hectares used for the production of timber or timber based products, the geolocation must be provided using polygons, meaning latitude and longitude points of six decimal digits to describe the perimeter of each plot of land. For plots of land under 4 hectares, operators can use a polygon or a single point of latitude and longitude of six decimal digits to provide geolocation.)