

EUDR Community of Practice

Core Group Session 3
29 June 2026 - Barcelona



Information contained in this slide deck is limited. Check the published reports from the case studies and subgroups discussions for deeper insights on this third session of the EUDR Core Group.

Agenda



8:45–9:00	Welcome coffee
09:00-09:30	Welcome and icebreaker Latest CoP updates and walk through the day
09:30-09:45	Setting the scene on legality due diligence
9:45-11:00	First round of case studies (4 groups divided among: cocoa & coffee / palm oil & rubber / timber / beef & soy)
11:00-11:20	Coffee break
11:20-12:10	Plenary debrief – key tensions and insights from case studies
12:10-1:00	Second round of case studies
1:00-2:00	Lunch
2:00-2:45	Plenary debrief – key tensions and insights from case studies
2:45-3:30	Deep dive 2 (plenary): Substantiated concerns
3:30-4:00	Coffee break
4:00 – 5:00	EUDR supply chain scenarios (understanding multiple roles)
5:00-5:30	Next steps: documentation, wider CoP sharing, future session themes
5:30	Close + afterwork drinks & dinner

Subgroups sessions (30 June 9.30 to 12.30) (optional)

1

EUDR supply chain dynamics & scenarios
(unpack priority ones and seek alignment)

2

Mini dry runs in the timber sector (EU and US sourcing)

3

Downstream due diligence in cases involving substantiated concerns

Anti-trust statement

Participants in this discussion meeting are reminded that they must not discuss any matter that relates to competitive issues between the participants. In particular, each participant must strictly avoid any discussions of confidential or competitively sensitive information about its business, including, but not limited to: prices, price levels, pricing strategy, price lists, trends, interest or exchange rates, rebates, discounts, margin changes, percentage price changes or methods of determining or implementing prices; costs, profits, margins; sales conditions, sales volumes/values, market shares; customer and competitor details, such as names, types, importance; allocations/limits (on territories, customers, activities, services, etc.); commercial output, know-how, strategy, developments, innovations. In addition, competitors must not discuss any suggestion of a boycott of third parties or bid-rigging.

+ Chatham House rule applies to all CoP discussion

Summary of key takeaways & next steps



3rd Core Group Session – Barcelona, Spain



A community in action

- Open, honest and solution-oriented discussions across companies (all present), Competent Authorities (8 represented at that meeting) and NGOs.
- A collaborative atmosphere focused on tackling shared implementation challenges, not assigning blame.
- Participants freely exchanged experiences, including the difficulties they are facing.
- Strong sense of community and broad agreement on the value of more regular in-person exchanges.
- Interactions with Competent Authorities reassured operators that CAs are pragmatic and aligned on many aspects of EUDR implementation.

Key messages on legality (main thematic focus for that session)

- EUDR country benchmarking and broader legality risks are distinct considerations. Benchmark classifications provide a starting point for due diligence but do not replace company judgement, risk assessment or consideration of wider governance concerns.
- Timber supply chains vary considerably across countries and business models, creating uncertainty over operator roles, obligations, and information flow, with much of the uncertainty stemming from areas of the FAQs that would benefit from further clarification.
- Some legality risks are more challenging to verify. Competent Authorities recognise that and will expect operators to show their best efforts.
- Participants highlighted ongoing uncertainty regarding the treatment of labour and human rights under the EUDR. While some argued that these issues are more appropriately addressed through dedicated labour and human rights legislation, others considered them to form part of the EUDR legality definition, with the scope and depth of assessment determined through a risk-based approach.

Other key insights

- The latest simplification package has helped address several issues raised in earlier sessions, with operators recognising that some previous concerns are no longer applicable.
- Core Group members identified several additional EUDR supply chain scenarios that could complement existing infographics.
- Operators and CAs benefited for discussions on substantiated concerns and other relevant information including clarification on downstream operators' duty to act on substantiated concerns.
- Challenges related to sourcing timber from the US persist, with suppliers often unwilling to provide geolocation data and legality information.

Next steps and priorities for next meetings

- Remaining 3 core group sessions: 8 September / 20 October / 1 December.
Interest from core group members to make the December session in-person (tbc in September) and to start a reflection on any possible continuation of the EUDR CoP beyond December.
- For September session: report back from the 4 subgroups
- Remaining priority topics:
 - Traceability issues (incl. in continuous production processes, first-mile challenges, verification of claims, declaration in excess)
 - Deforestation checks in complex landscapes and how to handle inconsistencies between tools/service providers
 - Ecosystem of open access tools for due diligence
 - Available EUDR training materials (participants mentioned the idea of an 'Emergency EUDR pack' for suppliers that may wake up to EUDR last minute)

Next steps and priorities for next meetings (continued)

- Engagement opportunities with wider Community of Practice (ad hoc meeting with certification schemes on July 15th; Public session of the EUDR CoP on September 17th, etc.)
- Strong demand for specific session on the IT system with a Traces expert/administrator.
- Interest from the Core Group in understanding national systems, platforms, and registries; facilitators to compile and share a list of country requests and commodity in question (idea of a self-assessment survey for national systems and ad hoc sessions tbc).
- Interest of some members to see how forthcoming legal repository can be made most useful to operators.

Presentations made during the session



Updates on the EUDR CoP

29 June 2026

Engagement with the wider CoP

The EUDR CoP has been presented and referenced in the following fora (May – June 2026):

- Webinar on Sustainable Palm Oil - Sustainable Development Festival 2026 ASviS – 18 May
- Sustainable Palm Oil Dialogue – 9 June
- World Economic Forum – a letter from big investors representing EUR 5.53 trillion in support of EUDR – EUDR CoP mentioned initiatives that support practical guidance – 21 June

Feedback – ad hoc meeting with service providers

16 June 2026 - Approx. 70 participants

- Thanks to Judith, Dom, John and Kathelijne for their active participation
- In most cases – service providers reduce burden and are ‘partners’ in EUDR readiness
- Challenges - Some providers were risk adverse when smallholders involved and are not aligned with interpretations
- Need for better interoperability and alignment across platforms.
- SMEs (midchain) face a biggest burden – dealing with many different systems

Feedback – ad hoc meeting with service providers (continued)

Insights from Service Providers:

- Biggest challenge – legal uncertainty of EUDR, how to keep up with constantly evolving EUDR
- Many agreed that transparency is core – balance intellectual property vs transparency
- Service provider cannot solve all – human touch needed from operators
- Better guidance on – how to report / document false positives, acceptable evidence, risk-based approach, how to present data / info
- Repetition in risk assessments - pooling information at a jurisdictional or federations levels?

Small group on Smallholders & Data

2. Workstream Prioritisation

Participants were asked to select up to four of the eight proposed workstreams most relevant to their organisation and area of work. The results (12 respondents) were as follows:

Workstream	Votes
Risk of market exclusion & fairness of compliance burdens	12
Cost burden of data collection & ongoing maintenance	8
Interoperability & duplication of data collection efforts	8
Smallholder access to own data & right to correction	5
Data monetisation & fairness of farmer remuneration	4
Informed consent & transparency in data collection	3
Role of indigenous peoples, local communities & customary tenure rights	2
Data sovereignty concerns	0

Participants selected up to 4 workstreams each. The workstreams are closely interconnected.

Setting the scene on legality due diligence

The legality criterion — what makes it different



- The EUDR has three cumulative pillars: geolocation, zero-deforestation, and **legality**.
- Deforestation and geolocation = EU definitions, uniform across origins.
- Legality is **context-specific**: depends entirely on national laws, which vary by country and commodity.
- Common misconception: legality ≠ legal reform. The EUDR only requires **compliance with the national legal framework as is**.
- Deforestation ≠ illegality: land cleared before 2020 may satisfy the deforestation criterion but still fail the legality one. **Both checks must be done independently.**

What does “relevant legislation” actually cover?

The laws applicable in the country of production **concerning the legal status of the area of production** in terms of:

- (a) Land-use rights
- (b) Environmental protection
- (c) Forest-related rules (not relevant for ag. commodities)
- (d) Third parties' rights
- (e) Labour rights*
- (f) Human rights*
- (g) Free prior and informed consent*
- (h) Tax, anti-corruption, trade and customs



European Union

Further explained by:

EC guidance



Relevance of legislation limited to:

- the **legal status of the production area**
- **direct link to the objectives of the EUDR:**
(fight against deforestation, forest degradation, climate change and biodiversity loss)

Scope is debated

Different approaches may be considered

Narrow scope:
only requirements directly linked to EUDR objectives or to the legal status of the area of production

Precautionary approach:
Full scope (incl. labour rights and human rights)

Possible in the case studies

Operators decide on their own due diligence approach.

Some mapping challenges

Identifying relevant law can be harder than it sounds

Moving targets — Legal frameworks shift. Legality mappings must be "living documents."

Grey zones — Some laws are vague, lack implementing regulations, or contradict each other.

Not relevant to the production of the commodity — Environmental impact assessments only applicable above a certain threshold, water permits only relevant for irrigated cultures, etc.

Barriers to demonstrating compliance

Weak enforcement — Laws exist but awareness and enforcement are limited. E.g.: unauthorised pesticide use, PPE, waste management, child labour in informal farming contexts.

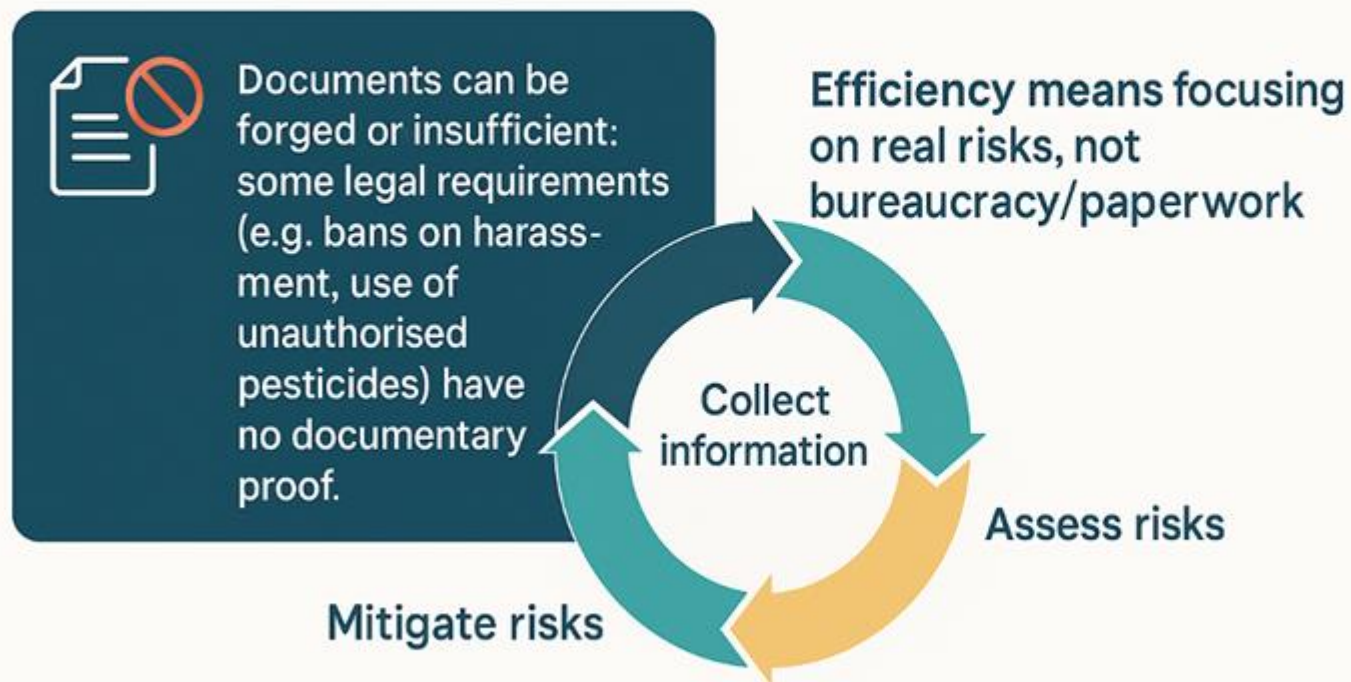
Data & privacy barriers — Labour/fiscal documents contain personal data; commercial confidentiality blocks access to tax records.

Geospatial data gaps — Protected area boundaries often unpublished, imprecise, or inconsistent between national sources and WDPA. Farms in "enclaves," admitted areas, or poorly mapped forest zones create real verification problems.

Smallholder mismatch — Most laws were designed for formal enterprises, not family farms. Labour and tax laws are frequently not respected, unenforced, and misunderstood in smallholder contexts.

What is legality due diligence?

A continuous process – not a box-ticking/
document gathering exercise



How to identify
& mitigate risks



Case studies and key topics

Case Study 1: Cocoa/coffee, Côte d'Ivoire

Smallholder land tenure, child labour, agrochemicals, agricultural frontier, downstream operators and substantiated concerns

Case Study 2: Palm Oil/rubber, Malaysia (Sabah)

Certification, customary land rights, forced labour, mill-level aggregation, national and third-party certification (for palm oil only), FPIC and environmental requirements of new plantations

Case Study 3: Timber, Romania

Illegal logging risk in a low-risk country, national traceability system, labour rights, downstream operator's obligations, MSPO, substantiated concerns

Case Study 4: Beef/Soy, Paraguay

Preliminary assessment, forced labour, indigenous rights, traceability, national legality system, certification

Plenary debrief – key tensions and insights from case studies

See case study reports

Deep dive 2 (plenary): Substantiated concerns

Presentations made by core group members (NGOs)
See also the subgroup report

What are **substantiated concerns** *and other relevant information* and how will they work in practice?

- Presentation to EUDR Community of Practice Core Group workshop, Barcelona, June 2026

It doesn't have to be a formal SC for it to demand action under the law

What the law says:

Obligations on operators and traders

- Obligations on operators and traders relate to “relevant new information” *including* [but not limited to] substantiated concerns (Art 4, para 5; Art 5, para 5)
- Risk assessments have to take into account SCs **AND** “any information that would point to a risk that the relevant products are non-compliant” (Art 10 para 2m)
- Simplified due diligence also requires action by operators and CAs in response to “any relevant information” – including but NOT LIMITED TO substantiated concerns... that would “point to a risk of circumvention of this Regulation” . (Art 13 para 2)

Obligations on CAs

When to carry out additional checks

- Competent authorities have to carry out checks when they “obtain or are made aware of **relevant information**, *including* [but not limited to] based on substantiated concerns submitted by third parties under Article 31, concerning a potential case of non-compliance with this Regulation” (Art 10, para 12)

How to target routine checks

- Competent authorities have to choose what checks to carry out in light of “**any other relevant information**” and the analysis of such risks “may be supported by other relevant sources such as [but not limited to] substantiated concerns” (Art 16, para 3)

When to seize or suspend

- Immediate interim measures (seizure or suspension) must also be provided for when “potential non-compliance with this Regulation has been detected on the basis of... **other relevant information**, including [but not limited to] substantiated concerns” (Art 23, para a)

The only requirement in the law which is limited to information meeting the definition of SC is the 30-day response requirement on CAs. (Art 31 Para 3)

But what about the guidance and FAQ (I hear you ask)?

Additional interpretation of the definition of SC provided in the guidance & FAQ re SCs **relates only to SCs.**

That interpretation DOES NOT have relevance to the “other relevant information” mentioned alongside SCs in all but one place in the law.

Specific to an operator or individual shipment?

The FAQ (section 4.1.5) states that an SC (if being sent to a company) include a **“link” between that specific company and the evidence** of illegality or deforestation, beyond just proof that the company sources the relevant commodity from the country concerned.

We (NGOs) would dispute this interpretation, which is extra-legal. But it is arguably irrelevant anyway, since it applies only to SCs and not to the “other relevant information” to which companies and CAs are also obliged to react to.

The only other content regarding SCs in the FAQ Section 4.1.5 is also not restrictive.

- It says an SC sent to a CA “may also concern multiple companies”
- It lists elements to be included in an SC “if possible”

There is no requirement, even if the FAQ is accepted, and even in the case of a formal SC, for the information to include, for example, a specific time of non-compliant production, or the identification of a specific shipment.

So what kinds of SCs (and other relevant information!) can you expect?

Don't expect the earth

- It is a good thing that the limits on SCs that you might think exist don't exist. That is because if those limits were hugely strict they would mean no SCs would ever be submitted, because collecting the most ideal level of detailed evidence is next to impossible.
- NGOs do not know what points of origin operators are claiming in their DD statements – only CAs have access to that info. We cannot disprove claims when we don't know what those claims are.
- Proving non-compliances in full detail is impossibly hard. You are not going to get SCs which give “chapter and verse” (specific shipment, specific date, past let alone future, to specific operator, with full supply chain back to harvest plot)

Information can be general but nevertheless fully evidenced and actionable

It might be evidence, for example:

- relating to a **particular primary producer or** secondary manufacturer/exporter
- relating to the **implementation of a certification scheme** claiming to provide EUDR compliance
- relating to a **particular geographical area** within a country

Example A – Illegalities in palm plantation

- NGO collects evidence proving that a particular palm oil mill in Indonesia is receiving fruits from a concession where relevant illegalities occurred. The mill is known to have been in EU supply chains in the past, but current information on EU companies sourcing from it is not available. Its parent company is known to be exporting to the EU, but shipment records give the consignee of those shipments as its Singaporean subsidiary, masking the identity of the EU operators. The EUMS destination *countries* are known however.

Actions such information should trigger per the law's requirements

Operators – the NGO sends the information to companies in the EU known to be operators for palm oil from Indonesia (limited number of companies, perhaps 10).

Those operators should:

- Check whether the geolocation of the concession has been submitted in the past
- If so, alert the relevant CA and downstream operators and traders
- Even if the geolocation was not claimed in past DDS, check whether the palm mill concerned is in their supply chain. If they are, exclude them and alert relevant CA and downstream operators and traders
- Even if neither of the above is true, check whether the risk related to other imports may be affected, such as if those imports are from mills in the same geographic area owned by the same company, or from palm grown in concessions neighbouring the non-compliant one. If so, exclude those mills and concessions from the supply chain until additional due diligence has been conducted which can reduce that risk to a negligible level

Actions such information should trigger per the law's requirements

Competent Authorities - The NGO also sends the information to the CAs in all EUMS to which the parent company has shipped palm oil in the last 1-2 years

Those CAs should:

- Check whether the geolocation of the concession has been submitted in the past
- If so, conduct checks on the DD systems of the operators involved, and obtain information on the downstream operators and traders to which they sold relevant goods
- Consider suspending the operations of those operators while such checks are carried out, and seizing any shipments 'on the water' which gave the concession as a geolocation
- Review the evidence supplied by the NGO, and take appropriate action against non-compliant companies in the EU

Actions such information should trigger per the law's requirements

Competent Authorities (cont..)

- Warn all other operators in their MS which have submitted DDS for palm oil from Indonesia about the findings.
 1. Advise them to ensure that the relevant concession and mill are excluded from their supply chains and the risk of them being in those supply chains unknowingly is reduced to a negligible level.
 2. Advise that they also check whether the risk related to other imports may be affected, such as if those imports are from mills in the same geographic area owned by the same company, or from palm grown in concessions neighbouring the non-compliant one. If so, advise that in order to be EUDR compliant they must exclude those mills and concessions from their supply chain until additional due diligence has been conducted which can reduce that risk to a negligible level



From EUTR to EUDR

Take aways from
the EUDR
implementation &
enforcement

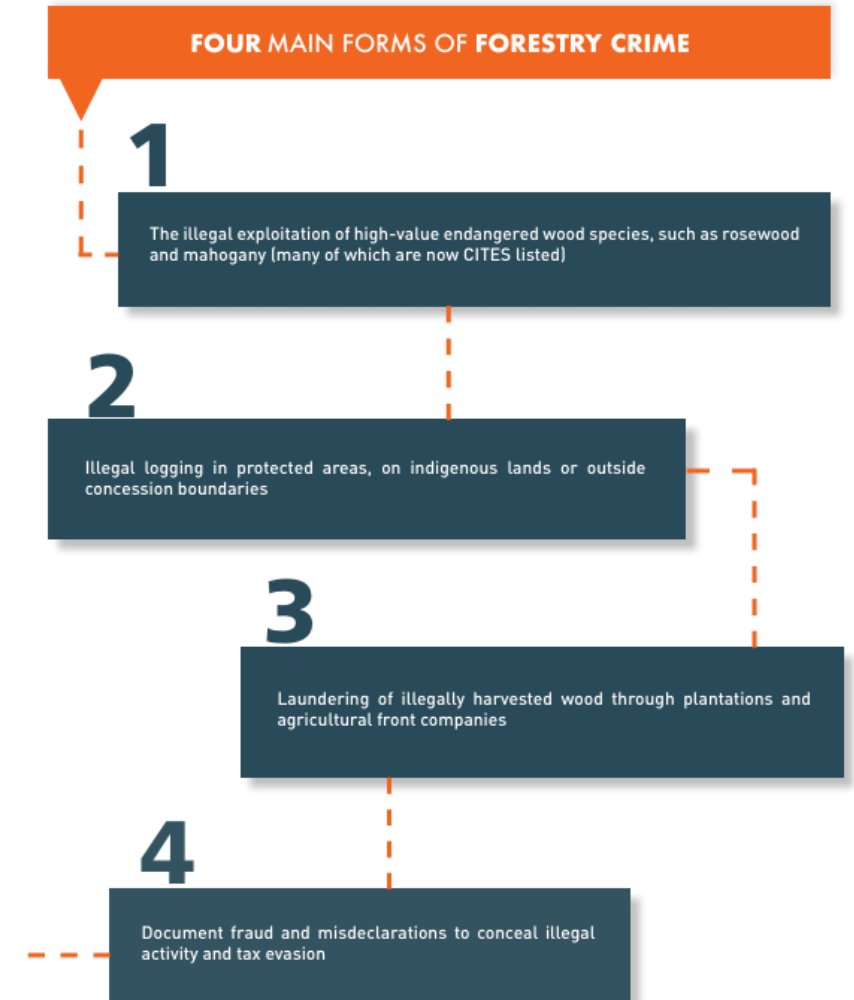
EUDR community of practice
meeting

28.06.2026

WWF

Illegal logging is linked to (organized) crime

- ***Illegal logging and forestry crimes are often carried out by organised criminal networks - and not only outside the EU***
- ***Addressing illegality and crime – not only in the forest sector, has benefits for:***
 - *economic viability and tax revenue for companies,*
 - *political stability,*
 - *national security,*
 - *Levelling the market playing field for business,*



Take-aways from EUTR implementation

Improving implementation and enforcement levels in the EU

- *Level and quality of EUDR implementation showed a high variety across EU Member States, which is problematic for companies working in different EU countries*

Checks along the whole supply chain

- *Checks carried out often targeted only the first supplier/operator*
- *Not targeting operators further downstream hindered the tracking of illegal products on the EU market, to the disadvantage of companies following the rules*

Balancing checks on due diligence and legality aspects

- *The focus of checks often lay on the due diligence systems of companies whilst checks on legality of products were often not carried out*

Timely following up on substantiated concerns

- *Different EU Member States had very different approaches, especially concerning checks and controls.*
- *Timely checks following the substantiated concerns would help tracking the products and alert companies about challenges in their systems.*

Take-aways from EUTR implementation

Sufficient resources are necessary,

- *Competent authorities, police and judiciary were often significantly understaffed and underfunded, leading to a lack of enforcement*

Coordination and cooperation between EU Member States is key

- *Though there was cooperation amongst a number of EU countries, coordination between all EU Member States would have been beneficial to create a level playing field*

Prosecution is the deciding factor for fines

- *Police, prosecutors and judges were often not familiar with the specifics of the EUTR and the timber sector. They were often not aware of the scale of the forest crime problem and had a high workload in general, decreasing the efficiency and effectiveness of the EUTR's implementation.*

Increasing transparency on enforcement

- *EU Member State reporting to the European Commission was often incomplete and patchy.*

How to avoid a substantiated concern?

June 2026

Sustainable Consumption and
Production

Fern

Principles for Good Due diligence (OECD & FAO)

- What do we consider and define as the most salient or priority risks?
- Which are our **highest risk suppliers** or other business partners?
- What steps do we take to **verify our supply chain data** and ensure that it is current?
- Do we **triangulate data, conduct supplier or site visits, conduct audits, use real-time data/tech**, collaborate or exchange information with industry groups, etc.?
- Do we provide **support to local farmers** and enterprises, and what form does this take (i.e. training, resources, equipment)?

More info here: https://www.oecd.org/en/publications/oecd-fao-business-handbook-on-deforestation-and-due-diligence-in-agricultural-supply-chains_c0d4bca7-en.html

RED FLAGS and EUDR compliance

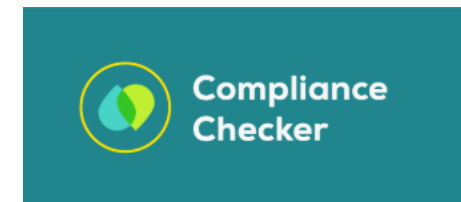
- Areas defined or known as protected areas, **collectively managed areas** (under tenure **rights of local communities or Indigenous Peoples**), high conservation value areas, or high carbon stock areas
- Areas with high levels of rural **poverty** and a **reliance on agriculture** as a main form of income.
- Areas which are considered as at high risk of **conflict**
- **Weak protection** of human rights, Indigenous Peoples' rights or poorly defined or contested land tenure rights
- **Weak governance and implementation** of the rule of law, and **corruption**

Info Sources Examples

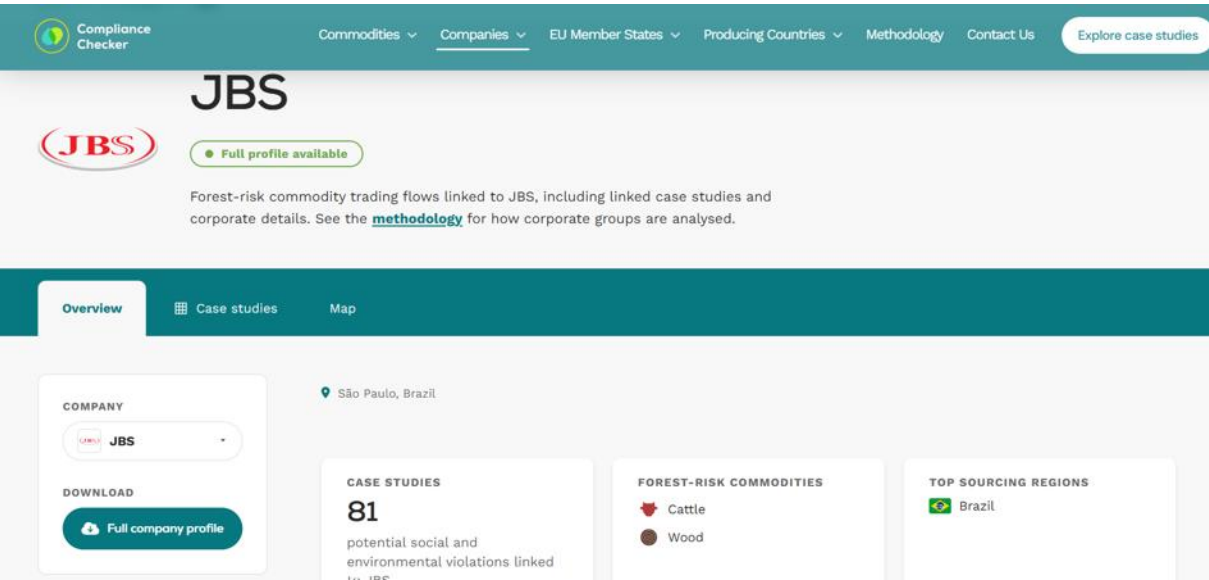
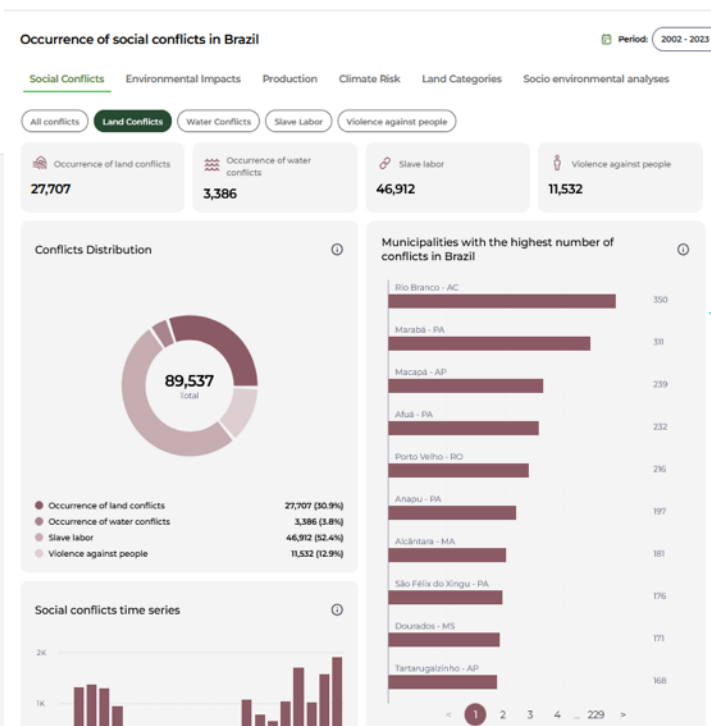
Official data: governments, prosecutors



Civil society data: national and international



EXAMPLES



Factsheet

Direct trade deforestation exposure by origin country and commodity

From a direct trade perspective, on average between 2021 and 2023, Germany was most exposed to deforestation in Côte d'Ivoire (5,590 ha, 47.2%), followed by Brazil (2,360 ha, 19.9%) and Peru (396 ha, 3.3%). Across all origin countries, the most important commodities were cocoa (5,940 ha, 50.1%), coffee (1,370 ha, 11.5%) and soy (1,320 ha, 11.1%). In Côte d'Ivoire, the most important commodity for Germany's deforestation exposure was cocoa (5,350 ha, 95.7%), followed by cashew nuts (179 ha, 3.2%). In Brazil, the most important commodity was soy (1,220 ha, 51.8%), followed by cattle products (674 ha, 28.6%).

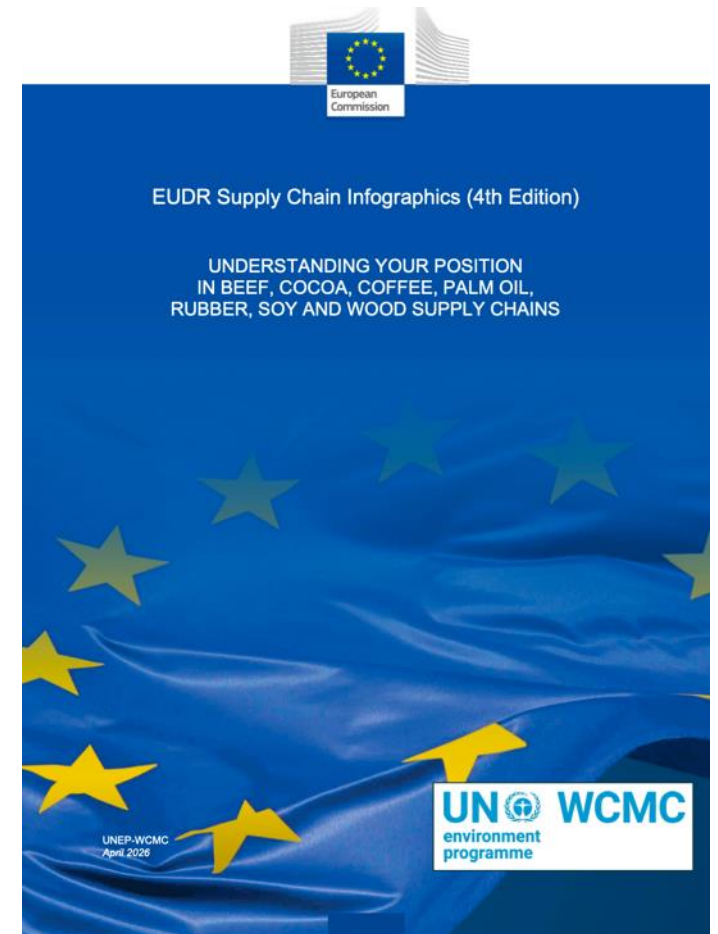


EUDR supply chain dynamics & scenarios

See subgroup report

EUDR supply chain scenarios

- Understanding multiple roles and related obligations
- “Our most important scenarios are not reflected in the the EUDR Supply Chain Infographics” (UNEP-WCMCM report)
- E.g, scenarios involving non-EU operators; dual roles (operator and downstream operator...); re-imports into EU...
- Opportunity to bring clarity, align on interpretations



EUDR supply chain scenarios

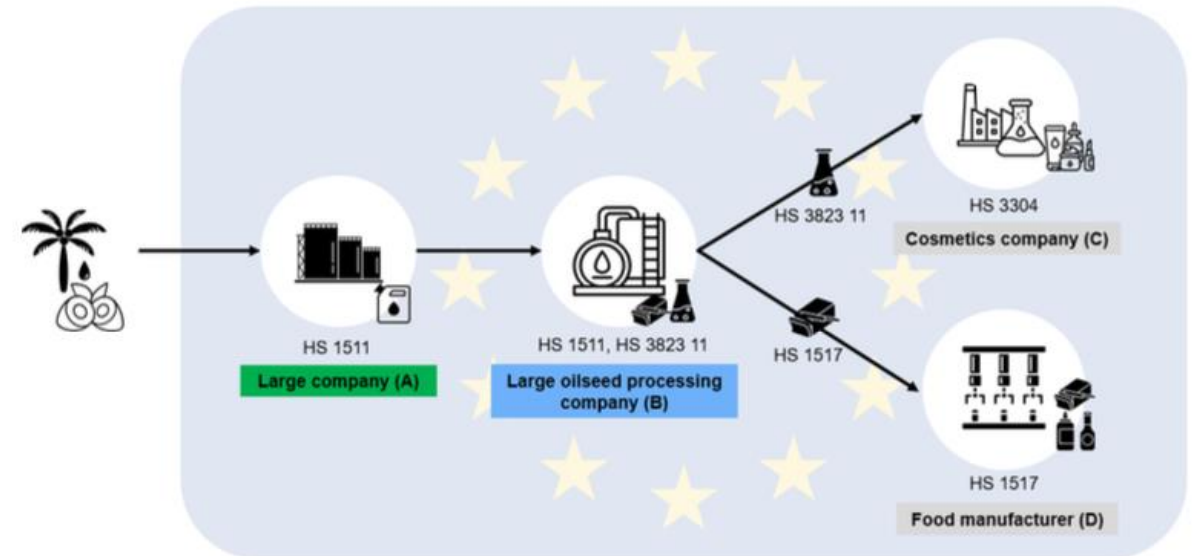
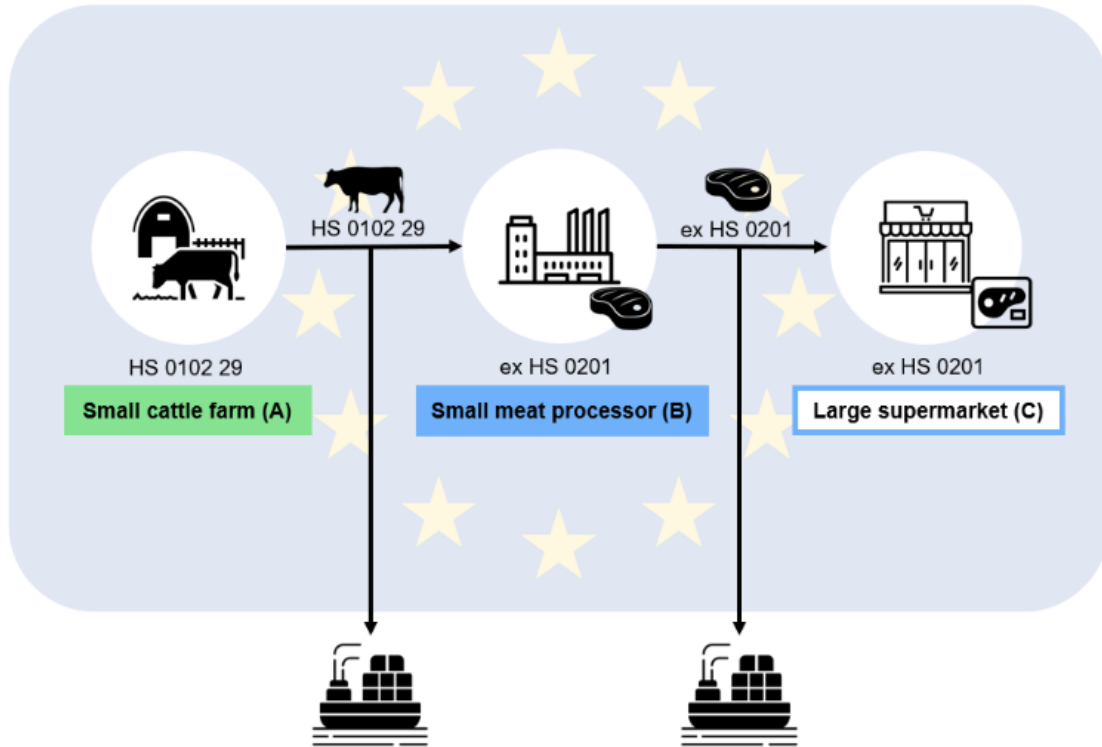


Table 2: Overview of commodity scenarios demonstrating combinations of company role, supply chain position and size.

Supply chain-specific scenarios and individual products are illustrative and the rules depicted in the scenarios generally apply equally for all relevant products.

Key: Upstream operator (Text Box 1) Upstream MSPO (Text Box 5) First downstream operator/trader (Text Box 4) Subsequent downstream operator/trader

[illegible]

Reminders on the obligations depending on the role

Key: Upstream operator (Text Box 1) Upstream MSPO (Text Box 5) First downstream operator/trader (Text Box 4) Subsequent downstream operator/trader

Company role	Action	Applicable Products	Due diligence obligations	Engage with the Information System	Responsibility for compliance in relation to due diligence	Action when information suggests product non-compliance	Record keeping requirement	Communicate DDS reference number or declaration identifier to downstream operators/traders	Public reporting requirement
Upstream operator	Places on or exports from Union market	Relevant products	✓✓ Exercise Art. 4(1)	✓✓ Submit DDS Art. 4(2)	✓✓ Assume and retain Art. 4(3) and 6(1)	✓ Inform (Art. 4(5))	✓✓ Keep record of DDS Art. 4(3)	✓✓ Art. 4(7)	✓✓ Art. 12(3) ³
Upstream micro or small primary operator (MSPO)	Places on or exports from Union market	Relevant products that the operator itself has grown, harvested or obtained from or raised on relevant plots of land ¹	✓✓ Exercise Art. 4(1)	✓ Submit one-time simplified declaration Art. 4a(2)	✓✓ Assume and retain Art. 4(3) and 6(1)	✓ Inform (Art. 4(5))	✗	✓✓ Art. 4(7)	✗
First downstream operator or trader (non-SME)	Places on or exports from Union market (operators) or makes available on the Union market (traders)	Relevant products ²	✗	✓ Register Art. 5(2)	✗	✓✓ Inform and verify (Art. 5(6)) ⁴	✓✓ Collect and keep incl. DDS reference number / declaration identifier Art. 5(3) (4) and recital 6	✗	✗
First downstream operator or trader (SME)	Places on or exports from Union market (operators) or makes available on the Union market (traders)	Relevant products ²	✗	✗	✗	✓ Inform (Art. 5(5))	✓✓ Collect and keep incl. DDS reference number / declaration identifier Art. 5(3) (4) and recital 6	✗	✗
Subsequent downstream operator or trader (non-SME)	Places on or exports from Union market (operators) or makes available on the Union market (traders)	Relevant products ²	✗	✓ Register Art. 5(2)	✗	✓✓ Inform and verify (Art. 5(6)) ⁴	✓ Collect and keep Art. 5(3) (4) and recital 6	✗	✗
Subsequent downstream operator or trader (SME)	Places on or exports from Union market (operators) or make available on the Union market (traders)	Relevant products ²	✗	✗	✗	✓ Inform (Art. 5(5))	✓ Collect and keep Art. 5(3) (4) and recital 6	✗	✗

For further information, check the published reports from the case studies and subgroups discussions.