Ad-hoc Meeting with Certification Systems

15 July 2026

1. Disclaimer

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2. Context

Service providers play an important role in supporting companies with traceability, legality and deforestation due diligence. This note summarises the discussion held between representatives of certification system (public and private schemes) and members of the EUDR Community of Practice technical core group on 15 July 2026.

Setting the scene: what the legality survey and dry runs tell us about certification systems

- Certification systems are already an important source of support for EUDR legality due diligence. The CoP legality survey found that certification forms part of the legality approach of most respondents, although it is rarely considered sufficient on its own.
- The survey also found that the main legality challenge is less with identifying applicable laws than with obtaining evidence of compliance, verifying its credibility, dealing with situations where formal documents do not exist, and determining what evidence is sufficient. This raises an important question about the extent to which certification systems can help provide, verify or give assurance over such evidence.
- The dry runs confirmed the value of certification, but also clarified its limits. Certification can provide important information and assurance, but it cannot be treated as a “green lane” for EUDR compliance. Operators remain responsible for their due diligence and need to understand how the certification system supports their assessment.
- The usefulness of certification therefore depends on what sits behind the certificate. The dry runs highlighted the importance of understanding a scheme's coverage of EUDR requirements, the robustness of its assurance system, and its traceability arrangements. Operators also need to understand limitations and identify where additional evidence or risk mitigation is required.

3. Presentation from the Dutch Competent Authority (NVWA)

1. **Dry runs carried out by the Dutch CA showed that certification is useful, but cannot replace due diligence**
    - Certification was frequently used by operators as a risk-mitigation measure—for example, where a risk had been identified and the operator relied on annual certification audits to verify the relevant issue.
    - But NVWA also encountered cases where operators only relied on certification as their evidence of legality: production locations and chain of custody were described, but the underlying legality documentation had not been collected.
2. **Traceability must demonstrate the link between the production location and the product**
    - Operators sometimes had good information about production locations but could not demonstrate that the specific goods entering the EU actually originated from those locations. Collecting geolocation and legality information is insufficient if it cannot be linked to the product or shipment.
    - This is an important area where certification systems could potentially add value through traceability and chain-of-custody controls.
3. **NVWA is assessing certification systems in stages.**
    - Step 1 – Governance and credibility: NVWA assesses aspects such as independence/impartiality, whether laws and regulations are actually checked, performance verification, treatment/exclusion of non-performing participants, and transparency.
    - Step 2 – EUDR coverage: NVWA then examines exactly which elements relevant to operator due diligence are reliably covered by the scheme.

    The practical objective is to identify areas where NVWA can have sufficient confidence in certification verification that it does not need to repeat the same checks itself. Once a scheme is assessed and NVWA determines which elements it can rely upon, this would not be permanent or unconditional. An annual/continuous monitoring cycle will be in place to check whether the scheme continues to perform as expected, whether information exchange works and whether problems have arisen.
4. **There will be no green lane access for certification**
    - Certification would not exempt certified companies from EUDR supervision.
    - Instead, certification could support how NVWA conducts an inspection / EUDR supervision.
    - If NVWA has confidence that a certification system reliably verifies a particular element, it may not need to verify that element again and can focus inspection resources elsewhere.
    - The potential benefit is therefore reduced administrative burden and more efficient supervision, not automatic recognition of EUDR compliance.

4. Challenges in supporting EUDR implementation by certification systems

Representatives from certification systems were invited to provide insights on the following questions:

What is the biggest challenge your clients face?
What elements of the EUDR may remain unclear at the moment?
What is one lesson learned from EUDR implementation so far?

- **Uncertainty over the evidentiary value of audit reports.** Schemes questioned whether an audit report confirming that specified legality requirements had been checked could itself constitute sufficient evidence, or whether operators would still need access to the underlying documents. Greater clarity from competent authorities on when audit evidence can be relied upon would reduce unnecessary duplication.

- **Fragmentation of operator requirements.** Different buyers may use different risk thresholds, satellite providers and acceptance criteria. As a result, the same plot or evidence may be accepted by one operator and rejected by another. Certification systems can provide common infrastructure and assurance, but cannot fully resolve differences in operators' individual due-diligence approaches.

- **Need for clearer expectations on acceptable evidence**. Certification systems called for clearer guidance from competent authorities on what evidence is considered credible, how certification evidence should feed into risk assessment, and when additional verification is expected.

- **Uncertainty created by the latest guidance on legality information collection.** A question was raised about guidance suggesting that where low risk can be established prior to detailed data collection, in-depth information may not be required. Schemes questioned whether certification audit reports could contribute to establishing such low risk. Competent-authority participants acknowledged that this interpretation remained unresolved and they would need to look at concrete cases.

- **Lack of harmonisation between competent authorities.** Certification systems expressed concern about potentially different expectations and enforcement approaches between Member States. This creates difficulty for schemes trying to design systems or evidence packages that can support operators across the EU.

5. Core Group reflections on certification systems

I. Challenges

- Certification systems may allow a certificate to remain valid while a non-compliance is being corrected. Under the EUDR, however, an identified non-negligible risk needs to be mitigated before the product can be placed on the EU market.
- Some certification systems may require illegality to be conclusively established before raising a non-compliance, whereas under the EUDR the operator must demonstrate that there is no or only negligible risk of non-compliance. This means that a valid certificate does not necessarily indicate negligible legality risk.
- Companies have to reassess information that has already been collected and verified through a credible certification system. There was concern that approaches may differ between competent authorities.
- Demonstrating the link between the plot and the product i.e. how certification systems can demonstrate that the geolocation submitted in the due diligence statement actually corresponds to the product concerned.
- Smallholder inclusion – some schemes or auditors apply more risk-averse approaches to legality and deforestation-free, this could make it difficult for operators to retain smallholders in their supply chains. Traceability gaps in certification, particularly where smallholders sell through intermediaries, were also identified as a potential driver of exclusion (example schemes that do not have standards for local dealers or intermediaries).
- Global or regional certification schemes may not always reflect the detail and complexity of national and local legality contexts. National systems can be well positioned to provide this contextual understanding.
- Differences may remain between certification requirements and the EUDR, including cut-off dates, definitions of deforestation and approaches allowing compensation for deforestation.
- Information relevant to EUDR due diligence may exist within certification systems but may not necessarily be accessible to the operator (not much information in the Public Summary of audit report).

II. Lessons

- Certification can support due diligence but does not replace it. Operators remain responsible for their own due diligence and cannot rely solely on the existence of a valid certificate.
- Certificate validity and EUDR compliance are not equivalent. A certified product can still present a non-negligible EUDR risk, particularly where the certification system applies different rules for handling non-compliance or legality allegations.
- The usefulness of certification depends on what it actually covers. Operators and authorities need to understand which EUDR requirements are addressed by a scheme and where gaps remain, including legality, deforestation and traceability. Schemes could provide standardise information Operators to access.

III. Recommendations

- Encourage operators to assess and document how certification supports their due diligence, including reviewing relevant audit findings and identifying where additional evidence or mitigation is needed.
- Promote greater consistency among competent authorities on how certification evidence can be used, so that credible checks are not unnecessarily repeated and operators face more predictable expectations across Member States.
- Clarify how certification can support product-to-plot traceability - certification systems could strengthen their contribution by demonstrating how certified material remains linked through the supply chain to the plots/geolocation information declared by the operator.

6. Looking ahead

The discussion highlighted significant potential for certification systems to support EUDR due diligence, while confirming that certification remains one input into an operator's wider due diligence process. The key question going forward is therefore not whether certification can be used, but how the information, verification and assurance generated through certification can be used effectively and proportionately by operators and competent authorities. The emerging work presented by a competent authority on assessing how certification can inform EUDR supervision provides an important opportunity to test these questions in practice.

Overall, the meeting provided a constructive platform for Core Group members and certification systems to exchange perspectives on the role of certification in supporting EUDR due diligence, identify practical challenges and limitations, and explore how certification information and assurance can be used more effectively.