



Ad-hoc Meeting with Service Providers

16 June 2026

1. Disclaimer

This meeting summary was prepared by the co-facilitators of the EUDR Community of Practice (CoP). It is intended to share the key points discussed, with no personal attribution (Chatham House rule applied), without review or validation by members of the EUDR CoP. As such, its content does not necessarily reflect the views of any particular member of the EUDR CoP.

2. Context

This note summarises the discussion held between representatives of more than 30 service providers and members of the EUDR Community of Practice core group on 16 June 2026.

Setting the scene: What the dry runs and legality survey tell us about EUDR service providers

- The legality survey conducted under the EUDR CoP found that operators are increasingly relying on external service providers to support specific elements of their EUDR due diligence, rather than developing all technical capabilities internally.
- Around half of respondents relying on service providers reported that they did not know which methodologies were being used, raising questions about operators' ability to understand and defend externally generated results.
- Transparency remains the main issue - EUDR dry runs show that competent authorities expect operators to understand and be able to justify the information, methodologies and analysis underpinning their risk assessments, including where these are provided by third parties.
- This creates a need for greater dialogue between users and providers of EUDR services. The session therefore sought to bring service providers and CoP Core Group members together to better understand these challenges, share lessons from implementation and consider how support services can contribute to effective and inclusive EUDR implementation.

3. EUDR implementation challenges of relevance to service providers

The meeting underscored the importance of service providers in the EUDR ecosystem, recognising their diverse roles in data provision, system development, and advisory services.

The meeting highlighted six main challenges faced by operators and service providers:

1. The opaque nature of risk assessment methodologies.
2. Outdated IT systems causing excessive data requests (not in line with latest simplifications for EUDR implementation).
3. Risk-averse behaviour leading to over-documentation and exclusion of suppliers in more complex supply chains.
4. Lack of alignment among service providers, resulting in inconsistent outcomes from different service providers analysing the same sources.
5. Over-reliance on global datasets (where national datasets may be available), without sufficient local context.
6. Concerns over data ownership, particularly for geolocation data, including amongst producer-country governments.

4. Reflexions from EUDR CoP Core Group members

Despite these challenges, company core group participants acknowledged the valuable contributions of service providers in facilitating compliance and sustainability efforts, allowing them to focus their efforts on the highest risks in their supply chains. Core group members shared their experiences, with retailers emphasising the benefits of service providers in reducing workload and focusing on high-risk scenarios, while also noting the complexity of aligning systems across diverse supply chains and actors.

Large importers described extensive efforts to select suitable service providers – often being asked to buy systems without having them fully explained – and highlighted issues with some suppliers relying excessively on their own service provider reports without providing sufficient evidence, raising concerns about the quality and verifiability of compliance data. They also raised the difficulty of building EUDR compliance into their existing commodity contracts specifying performance.

Smaller traders expressed the need for service providers to act as true partners, working together with the company to offer adaptable solutions that address both environmental and social risks. They also highlighted difficulties in finding adequate services for social (as opposed to environmental) issues and the burden of duplicative data reporting across multiple platforms.

Competent authorities reported limited direct experience with service providers but noted that reports received during dry runs often lacked sufficient detail and transparency, particularly regarding the evidence supporting risk assessments. They emphasised the need for clear documentation of data sources, methodologies, and evidentiary support to facilitate effective enforcement.

5. Reflexions from service providers

Service providers responded by acknowledging the complexity of delivering comprehensive services that balance technical rigour with transparency and intellectual property concerns, especially for legality due diligence. They stressed the importance of engaging suppliers in continuous improvement processes and called for harmonised approaches to legality assessments and risk evaluations to reduce confusion and waste. One common problem was that suppliers – particularly smaller ones – often did not understand the extent of the information required throughout their own supply chain. Service providers acknowledged the challenge of explaining to suppliers exactly what was required while at the same time protecting the intellectual property behind their own products. They also highlighted the problem of different service providers reporting different results for the same sources.

The burden of multiple, often conflicting information requests on suppliers, especially SMEs, was highlighted as a major challenge, with calls for greater alignment among buyers and service providers to streamline data collection and reporting.

The issue of false positives in deforestation detection was discussed – especially, though not only, in agroforestry – with participants noting the need for clear procedures to verify and reclassify such cases to avoid unjust supplier exclusion or queries from competent authorities. The need to avoid excluding suppliers was also an issue in situations where documentation was lacking, e.g. on the boundaries of protected areas.

Data ownership and the challenges faced by smallholders, particularly regarding land tenure documentation, were also addressed. Service providers shared experiences of working with local authorities to obtain evidence of land use rights, recognising the diversity of legal frameworks and the necessity of flexible approaches that do not unfairly penalise smallholders lacking formal titles. Transparency in data collection and reporting was emphasised as critical to building trust and ensuring compliance.

The discussion included reflections on the uncertainty surrounding the EUDR's enforcement timeline, which has caused delayed (re)investment in compliance efforts. Participants noted significant progress in digitalisation and supply chain transparency, thanks to the EUDR, in industries like rubber and others, but stressed the need for clarity and stability to sustain the momentum. The frequent delays and amendments of the EUDR – and on the availability of TRACES – caused confusion, with some clients of service providers not understanding the latest changes.

6. Looking ahead

Core group members and service providers explored opportunities for collaboration, such as developing standardised questionnaires and sharing risk assessments to reduce duplication, particularly where risks are assessed at a country level. The potential for jurisdictional approaches to supply chain data and transparency, to compile smallholder data and alleviate compliance burdens, particularly where the local legislative framework is very limited, was also discussed.

Participants recognised that while digital tools are valuable, human engagement remains essential to manage relationships and address complex issues, noting that reliance on external tools may not necessarily be part of a company's own due diligence process. The development of open-access digital solutions is also expected to facilitate accessibility of solutions to a wider set of actors, while fostering interoperability.

Overall, the meeting provided a candid and constructive platform for stakeholders to exchange experiences, identify challenges, and explore pathways to enhance the effectiveness and fairness of the EUDR implementation process, with a strong emphasis on partnership, transparency and continuous improvement across the supply chain ecosystem.