



Core Group Meeting Summary

Fourth Session – 8 September 2026

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 in the core group with the wider community of practice. This document was not reviewed nor validated by members of the CoP core group, and it is not meant to capture all points discussed, but only essential points. As such, its content does not necessarily reflect the views of Core Group as a whole, nor of any particular core group member.

1. Opening & context

The Chair, Duncan Brack opened the meeting and welcomed participants to the third Core Group session. He reiterated that the Core Group operates within a wider Community of Practice, which continues to grow and serves as a broader knowledge-sharing platform. Participants were reminded of housekeeping rules and confirmed compliance with the antitrust statement.

2. Update: engagement with wider community of practice

An update was provided on the EUDR CoP's engagement with the wider community between June and August 2026. The CoP was presented or referenced at the International Coffee Organization technical working group meeting on 30 June and in the Zero Deforestation Learning Series sessions on public-private collaboration and lessons for EUDR implementation, where core group members presented. A recording of the learning series session is available [here](#).

The ad hoc meeting with certification schemes on 15 July was also noted – insights are published [here](#).

Reports from the June meetings have been [published](#).

3. Feedback from Sub-group meetings

3.1. Subgroup 1 – Smallholders and data

Subgroup 1 on smallholders and data, organised by Tony's Chocolonely with the support of IDH, has met four times and is beginning to finalise its report. The group is expected to present its findings at the next Core Group meeting in October.

3.2. Subgroup 2 - Supply Chain Dynamics and Scenarios

Subgroup 2 shared emerging findings from its draft report, which examines real supply chain situations where members remain uncertain about how EUDR roles and obligations apply. The report covers eight scenarios across four topics and will be further refined with core group members. The Core Group discussed the first two topics.

EU re-import after processing in a non-EU country of products initially exported from the EU. Members considered a case in which rubber is placed on the EU market, exported for processing outside the EU and later re-imported in the EU as aircraft tyres. The discussion centred on how the re-importer could demonstrate that the material had previously been covered by due diligence (to be able to just use the conventional reference number in the customs declaration, and avoid the need to submit a new DDS with associated due diligence on these re-imported materials), particularly if it had changed hands several times outside the EU. Members suggested that commercial records and a documented account of the product's movement could help establish this link, but asked what evidence Competent Authorities would consider sufficient. It was noted that, based on experience under the EU Timber Regulation, a supplier's declaration alone would not suffice.

Participants also raised the risk that a previous due diligence statement reference could be used for different material. This led to questions about how authorities could verify the identity of the re-imported material and about the original operator's responsibility when its statement is used further down the supply chain. Members considered the case separately from one in which the exported rubber is mixed with material that had not previously been placed on the EU market; they viewed the latter as requiring due diligence when the resulting product is imported into the EU.

Preparing information before import. The second discussion concerned supply chains in which a business outside the EU collects geolocation data before another business imports the goods. Members described the practical difficulty of passing large geolocation files through complex supply chains, particularly when products are combined, transformed, returned or moved in mixed shipments. Some had explored whether an earlier due diligence statement could be referenced by the eventual EU importer, allowing the underlying information to be carried forward without repeatedly exchanging the geolocation files.

Members noted that referencing another entity's statement was no longer available in the Information System. Several supported restoring the function, including for situations where the business preparing the information is not the business that clears the goods for import. Others asked how responsibility would be allocated if the underlying information proved incorrect, and cautioned against shifting the burden to suppliers outside the EU. The subgroup will continue examining both the practical

options and the outstanding questions on evidence and responsibility as it finalises its report.

Discussion points:

- The exact re-import question: the possibility to use a conventional reference number for re-imports.
- The proposed evidence: purchase orders and invoices for a direct transaction; for longer chains, a documented flow of goods supported by a supplier declaration.
- The control concern: an NGO member asked how authorities could detect misuse of an earlier DDS reference or falsified evidence.
- The so-called “shadow DDS” mechanism: a business outside the EU would submit geolocation data to the Information System (provided it has an EORI number) before the goods entered the EU, so the eventual importer could reference that statement (however DDS referencing is no longer possible in the latest TRACES updates). Members described having tested parts of this approach, while also questioning whether it fits the intended use of the system.
- The distinction between referencing and grouping: a participant said the available grouping function works within an entity and does not replace referencing another entity’s DDS.
- A specific commercial case: under CIF sales, the seller may prepare the information while the customer clears the goods, creating a need to transfer it.
- The extent of agreement: several members favoured restoring referencing, but the discussion needs to be continued.

3.3. Subgroup 3 - Substantiated concerns, additional information and related enforcement questions – Subgroup feedback

The Core Group reviewed the subgroup’s discussions on substantiated concerns, additional information and enforcement, drawing on a hypothetical cocoa supply-chain scenario examined in the June session. The discussion highlighted several areas requiring clarification and qualified some of the proposed good practices.

- **Information thresholds and responses to concerns.** Participants sought clarity on the distinction between a formal substantiated concern and the ‘other relevant information’ mentioned in several articles of the regulation, indicating possible non-compliance, including the obligations each triggers. Credible press reports, NGO findings and other relevant evidence were identified information that must be considered in due diligence and risk assessment. The presentation also encouraged combining satellite information, risk maps and supplier evidence when assessing possible deforestation.

- Response timelines and coordination between competent authorities.** Questions remained about the response expected within the 30-day period and the timelines for subsequent investigation. One competent-authority representative considered that the initial response could acknowledge receipt and indicate whether the information provides a basis for investigation, rather than communicate completed findings. Participants also highlighted the need for coordination where concerns affect several Member States. Experience shared suggested that one authority would often initiate checks and pass its findings to others, allowing subsequent investigations to build on existing information.
- Operator responsibilities and supplier engagement.** Participants questioned whether notifying a competent authority is sufficient when a downstream actor cannot obtain the information needed to address a concern, or whether affected products should also be held pending clarification. Prompt internal checks and advance preparation for concerns arising during shipment—including contractual responsibilities and liability—were proposed as good practices. The discussion also distinguished continued engagement with a struggling supplier from acceptance of non-compliant goods: engagement may support future compliance and reintegration into a supply chain, but does not justify placing non-compliant products on the EU market. Further competent-authority input was sought on how genuine improvement efforts would be assessed.
- Enforcement approaches and corrective measures.** A distinction was drawn between shortcomings in due diligence systems, such as missing information or insufficient risk mitigation, and established non-compliance of particular products. One participant anticipated that inspections would more commonly identify system weaknesses, while proving product-level non-compliance could be more complex. The discussion highlighted the need for consistent thresholds for immediate intervention, clear timeframes for corrective measures and coordination across differing national enforcement provisions. A staged, documented approach to information requests and enforcement was also proposed.
- Handling non-compliant goods.** Participants stressed that no consensus had been reached on confiscation, storage at operators' premises or donation as recommended practices. Practical concerns included limited storage capacity, the difficulty of donating bulk commodities requiring processing, and food-safety requirements after prolonged storage. Although fines were discussed as an enforcement option used, participants cautioned that payment of a fine should not, by itself, allow established non-compliant products to remain on the

market. Further work is needed on how penalties, corrective measures and the handling of affected goods should operate together.

The subgroup report will be revised to reflect these comments and circulated to subgroup participants and other interested Core Group members. A further online discussion was proposed to examine the outstanding questions, with additional input from competent authorities.

3.4. Subgroup 4 - Timber (EU and US sourcing)

The subgroup examined challenges relating to EU and US timber sourcing, bringing together industry, competent-authority and NGO representatives. Follow-up work is continuing on both strands, with the Core Group discussion focusing primarily on due diligence statements (DDS) for vertically integrated companies sourcing timber within the EU.

US sourcing: ongoing engagement and development of solutions. Following the June session discussion, EFI initiated exchanges with the US National Alliance of Forest Owners (NAFO) and the Forest Service International Foundation to explore the challenges identified in the sourcing scenario. Work is underway towards a possible publication outlining these challenges and potential solutions. An industry participant also reported further work in response to the subgroup's feedback and proposed comparing progress with EFI and its US interlocutors.

EU sourcing: challenges for vertically integrated companies. The scenario concerned a single legal entity that purchases standing trees, carries out harvesting, processes the timber and sells the finished products. The industry was concerned that internal transfers might not constitute placing on the market, meaning the DDS must cover the finished product. Industry highlighted the operational difficulties this creates when timber from own harvesting is mixed with purchased timber already covered by DDS references. Managing geolocation information through production, linking inputs to finished products and transferring this information through existing business systems were described as particularly challenging.

Proposed approach and unresolved interpretation. Industry proposed submitting a DDS for harvested timber at or before harvesting, with subsequent processing treated as downstream activity. This was considered more practical for managing information and facilitating checks close to the source. The competent authority recognised the practical rationale for submitting the DDS as close as possible to harvesting. However, internal transfers within the same legal entity do not constitute a "supply" / placing on the market under the interpretation of FAQ 2.10 discussed. The competent authority proposed FAQ 5.19 to provide some flexibility around when DDSs are submitted, but the operator considered this not workable for continuous industrial processing and not a solution to the underlying problem.

The discussion did not reach a workable solution or common interpretation. The case has potentially broad relevance for EU wood processors and points to a need for clarification in EUDR guidance/FAQs to enable consistent implementation while avoiding unnecessary administrative burden.

Key discussion points

- **Further clarification on DDS timing and operator roles.** The discussion highlighted the need for further exchanges between competent authorities on how DDS requirements apply to vertically integrated timber businesses, taking account of national forestry and trading practices. Participants explored whether submission at or before harvesting could allow subsequent processing within the same legal entity to be treated as downstream activity. Further discussion through formal competent-authority channels was proposed to support consistent application.
- **Consistent and practical requirements across sourcing models and company structures.** Participants highlighted the importance of ensuring that DDS arrangements work effectively for different sourcing models and organisational structures, including EU-harvested and imported timber and businesses combining harvesting and processing within one legal entity. Further clarification could support consistent treatment of comparable operations and avoid encouraging changes to corporate structures solely to simplify DDS handling.
- **Practical feasibility and effective controls.** Industry emphasised that the issue affects a substantial number of European timber businesses and that any solution must reflect how timber is mixed and processed in practice. Submitting DDS information close to harvesting was presented as facilitating verification, while the Spanish representative stressed the need to understand companies' processes and retain supporting information within their systems.

The discussion concluded with a call to take the differing interpretations forward through formal exchanges between competent authorities. Further technical dialogue with industry was also supported to explore workable arrangements.

4. Exchange with TRACES

The Core Group held an exchange with an expert from the European Commission's TRACES team, based on questions and practical observations submitted in advance. The session clarified recent developments in the EUDR Information System and provided an opportunity for members to explain operational challenges encountered during testing and preparation. Several issues were identified for further technical discussion.

Main updates and clarifications

- DDS grouping and the 25 MB limit – it was confirmed that release 8.2.1, deployed on 31 August, introduced voluntary grouping of an operator's own due diligence statements (DDS). Individual submissions must still respect the 25 MB limit: users must divide larger datasets before submitting them, after which the statements can be combined under a "group head" with its own reference and verification numbers. The group-head reference is then used for relevant official procedures, including customs declarations. The system does not automatically split geolocation files, as responsibility for preparing and submitting the data remains with users.

It was stressed that the 25 MB limit is a fixed technical constraint of the underlying platform. He encouraged operators to consult the Commission's recommendations for reducing geolocation file sizes, including avoiding excessive coordinate precision. Tests on datasets provided to the team had demonstrated substantial potential reductions, although the results depend on the original data.

- Grouping vs referencing – it was explained that the previous DDS referencing functionality had been removed to reflect the amended Regulation's provisions on downstream submissions. Its reintroduction was not planned. Voluntary grouping allows operators to combine their own submissions within the applicable rules; it does not restore the previous links between statements submitted by different entities.
- Bulk submissions and API functionality – it was confirmed that simplified declarations can be uploaded in bulk through the application programming interface (API), including by authorised representatives acting for other operators, and that technical specifications are available. On the question of using one webservice connection for several legal entities, a member indicated that a recent release appeared to address the issue. Further written details were invited if clarification was still needed.
- Processing times, capacity and system readiness – The EC indicated that straightforward DDS submissions normally become available and receive a reference number within approximately three to five minutes. Processing can take longer depending on data complexity or competent-authority intervention; this was therefore not presented as a guaranteed processing time for every submission. Continuous monitoring and round-the-clock incident management, with disturbances escalated within the Commission was described, expressing confidence that the system could accommodate the expected traffic. This was linked to assessments of stability improvements and changes reducing

submission volumes, including one-off simplified declarations and the removal of downstream DDS submissions.

- Contingency arrangements – it was explained that contingency measures would be invoked for unplanned system outages exceeding 60 minutes. Detailed arrangements were still being coordinated with Commission services and Member States. The intention was to communicate them ahead of the legal deadline so that stakeholders could prepare, with finalisation hoped for during the month of the meeting.
- Risk profiling and competent-authority checks – the EC explained that competent authorities can establish risk profiles to identify submissions requiring attention, including targeted checks before products are placed on the market. Risk status is visible to competent authorities and customs authorities, rather than operators. Detailed criteria, thresholds and authority-specific tools were reserved for exchanges through competent-authority channels.

Requests for supporting evidence would depend on the concern and the authority's assessment. The EC stressed that pre-market intervention was intended for targeted high-risk cases, while most checks were expected to take place after market placement. The duration of an investigation would depend on the applicable provisions and the authority's assessment, with delays kept as short as necessary to establish compliance.

- Amendment, withdrawal and record retention – the EC explained that DDS amendment or withdrawal is generally possible within 72 hours of the statement becoming available, but not once the product has been placed on the market or exported, or the reference number has been made available to customs. Simplified declarations however can be updated without the same time limit.

It was also clarified that the Information System retains DDS records for at least five years. This does not replace operators' responsibility to retain the underlying information needed to demonstrate their due diligence.

- Registration, access and guidance – the EC reported that the bug preventing DDS creation with identifiers other than VAT, TIN or EORI had been fixed, while recommending those commonly-used identifiers wherever applicable. Companies can register multiple relevant roles, including authorised-representative roles. Password renewal and account-locking issues when they arise should be addressed through the relevant support channels.

A correction had also been made for production-place addresses containing national special characters. An updated user guide was being finalised, with an English version to be followed by translations. Release notes and technical

guidance were available through the Information System's public communication channels.

Key discussion points

- **Grouping reduces the number of references but leaves data-preparation challenges.** Members explained that they had expected grouping to accommodate large files automatically. Having to split datasets externally, submit them separately and then group them creates additional work and may require changes to company systems. While file-size reduction guidance was welcomed, members highlighted that very large datasets would still present practical challenges.
- **Information continuity in supply chains involving non-EU processing.** Members asked whether referencing could be retained as a voluntary tool to help transmit information where products pass through non-EU entities, including export for processing and subsequent re-import. Their concern was the reuse of information already held in the system and the avoidance of repeated data transfers involving geolocation files. The EC reiterated the system's alignment with the amended framework; the operational issue remained open for further discussion.
- **Automated retrieval of submitted DDS documents.** A member requested an API function returning the submitted DDS as a PDF, alongside the reference and verification numbers. The member explained that competent authorities had requested these documents during dry runs, while downloading them individually creates manual work despite automated submission. The EC noted that operators already hold the submitted data and receive confirmation through the reference numbers. He nevertheless invited a written explanation of the use case so the team could assess the request, including its implications for system traffic. No commitment to develop the function was made.
- **Quantity changes in bulk shipments.** Members highlighted difficulties where final shipment weights become known only after unloading or change during transport, including through moisture variation. They requested closer alignment between DDS and customs amendment procedures, or a quantity-tolerance function, to avoid duplicate submissions and additional administration.

The EC explained that the amendment restrictions and quantity fields reflect the applicable legal framework. He distinguished a shipment below the quantity covered by due diligence from a shipment exceeding that quantity and reiterated the requirements for declaring net mass for imports and exports. The exchange clarified the system's constraints but did not resolve members' practical concerns about managing bulk-shipment variations.

- **Predictability of checks and the consequences of false positives.** Members sought greater clarity on what may trigger controls, the evidence needed to resolve a flag and the likely duration of any interruption. They highlighted the potentially substantial costs of holding shipments where an initial concern is subsequently found not to indicate non-compliance. The EC stressed the targeted nature of pre-market checks and competent-authority discretion.

Members also asked for guidance on how the system identifies potentially excessive production volumes associated with plots. The EC confirmed that relevant functionality exists but declined to disclose thresholds that could enable avoidance of controls.

- **Time to prepare for contingency procedures.** Members' advance questions emphasised the need to test arrangements before application, including how contingency references would be issued, whether they would be available through the API and how they would be recognised by customs authorities.

Follow-up

The co-facilitators will consolidate unanswered questions and relevant chat contributions for further exchange with the TRACES team. The EC invited members to submit additional questions and detailed technical use cases.

5. EUDR Emergency Package

The Core Group revisited the proposal, first raised at the June session, to develop an “EUDR Emergency Pack” providing practical support for businesses and suppliers beginning their preparations close to application. The co-facilitators invited views on the intended audience, essential content and opportunities to build on existing resources and lessons from dry runs. The scope—including whether to focus on import supply chains, domestic sourcing or both—remained open.

Building on existing resources. The co-facilitators demonstrated the [Sustainable Supply Chain Toolkit](#), developed with partners under the Team Europe Initiative on Deforestation-free Value Chains, as one possible resource. The toolkit introduces key elements of EUDR due diligence through accessible explanations, practical steps and links to free and open-access tools. It also provides information on tool functionality, access, data storage, integration and learning resources.

Practical tools for implementation. The demonstration illustrated how users could move from understanding a task, such as collecting geolocation data, to identifying tools that support it. GeoRoots was highlighted as a potential resource for preparing, checking, splitting and merging GeoJSON files, directly connecting the demonstration to the large-file challenges raised during the preceding TRACES exchange.

Core Group members welcomed its accessible format and practical focus as a useful starting point for the proposed EUDR Emergency Pack. They suggested strengthening it with simpler guidance on determining company size and roles, as well as a basic structure for organising due diligence systems, linked to relevant tools and resources. Members also sought clarification on commercial-use and data-licensing conditions and stressed the importance of distinguishing the sharing of existing resources from formal CoP endorsement.

Next steps

The co-facilitators will share the toolkit link and invite members to identify missing content, difficult-to-access guidance and practical resources that would help their businesses or suppliers. This feedback could inform improvements to the existing resource and help define the Emergency Pack's audience and content. A dedicated small-group discussion and a fuller agenda item at the October Core Group meeting were proposed, with the format and status of any eventual 'emergency pack' product still to be determined.

6. Next Steps

- Public CoP session – 17 September. The two-hour session will share insights from the June legality case studies and subgroup discussions, including work in progress and unresolved questions. Core Group members were invited to deliver short contributions reflecting operator and competent-authority perspectives. The co-facilitators will approach potential speakers. The agenda will also allow questions and observations from the wider community.
- Next Core Group meeting – 20 October. Planned topics include feedback from the subgroup on smallholders and data, further consideration of the EUDR Emergency Pack, a dedicated discussion on traceability and the preparation of a discussion on the possible conclusion or continuation of this initiative at the end of the year. This could include questions about production volumes associated with plots and farms and how these are assessed by TRACES and Competent Authorities. An exchange with the organisation developing repositories on legality and certification schemes with the European Commission is also being explored, subject to confirmation.
- Ad hoc geospatial-data session – 15 October. Core Group members will be invited to a 90-minute online exchange linked to a technical workshop taking place in Barcelona on 14–15 October. The session will provide an opportunity to engage with geospatial-data providers, producer-country representatives and international organisations.

- Exchanges on producer-country systems. The co-facilitators proposed dedicated sessions where governments and commodity bodies could present national traceability systems, geolocation registries and legality tools and receive practical feedback from both operators and competent authorities. Initial examples included Malaysia's national rubber and palm oil system and Colombia's legality tools for 3 commodities. These would be separate country-focused discussions, provisionally around one hour including questions. This will be organized in the same spirit as the previous ad hoc meetings organized with service providers and certification schemes: core group members engage with specific stakeholder groups, in a structured manner proposed by the co-facilitators, and provide technical feedback to the extent possible. EFI will circulate information on the requests and assess members' interest and availability before scheduling priority exchanges.
- Final Core Group meeting – 1 December. A poll showed a clear preference for meeting in person in Brussels, with 79% in favour. The co-facilitators will explore hosting and logistical arrangements and confirm the format. The date will remain unchanged.