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Federal Agency for
Nature Conservation

EU Deforestation Regulation in action: Towards just and effective implementation



POLICY BRIEF #01/2025

Key messages

- **Consumption in the European Union (EU) is a major driver of global deforestation**, with high demand for forest risk commodities contributing to biodiversity loss and climate change worldwide.
- **The EU's Deforestation Regulation (EUDR) marks a milestone legislative response.** It requires operators to ensure that products placed on or exported from the EU market are free from deforestation and forest degradation, legally produced, and geolocated to the plot level. Maintaining its high ambition is crucial.
- **Effective operationalisation is key:** EU Member States should invest in enforcement capacity, foster inter-agency coordination, and harmonise verification approaches to ensure consistent application of the regulation.
- **Building distributive legitimacy requires inclusive engagement with producer countries:** The EU should support smallholders and ensure that the 2028 impact assessment evaluates distributional effects to adjust the regulation if needed.
- **The EUDR's scope should expand over time** to include other ecosystems and high-impact commodities, thereby preventing leakage and maximizing environmental impact. In addition, the country benchmarking methodology should be reviewed as planned to avoid future misclassification.
- **A broader vision is needed:** Policymakers should complement the EUDR with measures targeting financial flows, infrastructure, and demand-side pressures to address the structural roots of ecosystem destruction.

Keywords: Global forest loss, EU deforestation regulation, due diligence, enforcement capacities, smallholders, transformative change, just transition

1 Why the EU Deforestation Regulation matters

1.1 Background: The EU's role in global deforestation

Forests are essential to planetary and human well-being. They serve as critical carbon sinks, help regulate the global climate, and stabilize soils and water cycles (European Environment Agency, 2024; Pan et al., 2024). Forests also provide habitat for over 80% of terrestrial animal, plant, and insect species, and support the livelihoods, cultures, and health of millions of people worldwide through income, food, medicine, and spiritual significance (FAO & UNEP, 2020). **Protecting forests is thus not only an environmental imperative but also a social and economic necessity.**

Nonetheless, global forest loss continues at an alarming pace. Since 1990, **the world has lost an estimated 420 million hectares of forest** – an area larger than the EU itself (FAO, 2020, p. 18). Agricultural expansion remains the dominant driver, responsible for nearly 90% of global deforestation (FAO, 2022, p. 47). Over half of this is due to the conversion of forests to cropland, with livestock grazing accounting for around 40% (ibid.). Deforestation is not only a leading cause of biodiversity loss (IPBES, 2019), but also

contributes between 13 and 21% of global greenhouse gas emissions (Nabuurs et al., 2023).

EU consumption is a significant contributor to global forest loss. Between 1990 and 2008, the EU was responsible for approximately one-third of global imports of high deforestation risk commodities such as soy, palm oil, and beef, making it the largest importer of embedded deforestation worldwide at the time (European Commission. Directorate General for the Environment. et al., 2013, p. 23).

Although the EU's relative share has declined in recent years due to rising demand from other consumer markets, its consumption remains disproportionately impactful, in terms of both per capita consumption and absolute volume. **In 2017, the EU accounted for 16% of global deforestation-linked trade**, placing it second only to China at 24% (Wedeux & Schulmeister-Oklenhove, 2021). Without regulatory intervention, the EU's continued demand for commodities with high deforestation risk could result in nearly **250,000 hectares of additional deforestation annually by 2030** (European Commission, 2021, p. 37).

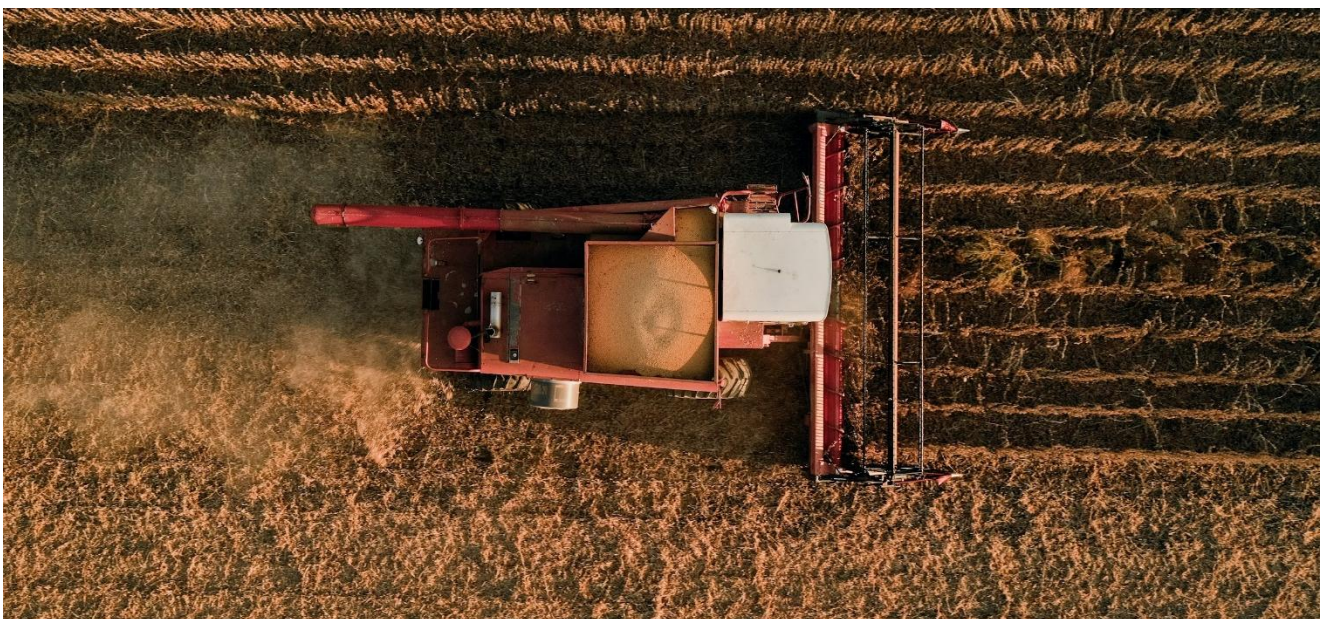


Fig. 1: Agricultural expansion remains the dominant driver of global forest loss, responsible for nearly 90 % of global deforestation (Credit: Donnie Rose/Unsplash)

1.2 The EUDR: A landmark in global supply chain regulation

The EU Deforestation Regulation (EUDR¹) is **the EU's ambitious effort to address its role in global deforestation**. It permits products to be placed on or exported from the EU market only if they are verified as free from deforestation or forest degradation,² legally produced under the laws of the country of origin, and covered by a due diligence statement (Art. 3 EUDR). The regulation covers products derived from or containing seven high-risk agricultural commodities: **cattle, cocoa, coffee, oil palm, rubber, soy, and wood** (Art. 1 EUDR). These commodities account for the majority of EU-driven deforestation (European Commission, 2021). A strict cut-off date of 31 December 2020 means products from land deforested or degraded after this date are excluded from the EU market, even if such land-use changes were legal under domestic law.

Operators – any actor placing relevant products on the EU market or exporting them from it (Art. 2 (15) EUDR) – bear the primary obligation. They must conduct **mandatory due diligence**, comprising three key steps:

- **Collect information (Art 8 (2) a, 9 EUDR):** Operators are required to gather detailed product information. This includes the type and description of the product, the country of production, and, crucially, the precise geolocation coordinates of all plots of land on which the relevant commodities were cultivated, either as a single coordinate (for plots under 4 hectares) or as a detailed polygon (for larger plots) (Art. 2 (28), EUDR). Otherwise, the product cannot be placed on or exported from the market.
- **Assess risk (Art. 8 (2) b, 10 EUDR):** Based on the collected information, operators must assess the likelihood of non-compliance. For products from standard- and

high-risk countries, they must consider contextual indicators such as forest presence, Indigenous land claims, and regional deforestation risk. Only products with negligible risk can be traded.

- **Mitigate risk (Art. 8 (2) c, 10 EUDR):** If risk is not negligible, operators must adopt mitigation measures. These can include obtaining additional documentation or commissioning independent audits at the production site.

Small and medium sized enterprises (SMEs) benefit from a **lighter compliance regime**: they can rely on upstream due diligence statements, are exempt from annual reporting, and are not required to implement certain internal risk-mitigation measures like appointing compliance officers (European Commission, 2025).

To ensure traceability and regulatory oversight, all due diligence statements must be submitted through a centralised **Information System** established by the European Commission (Art. 33 EUDR). This platform functions as the official gateway for compliance. Operators must upload the required information and formally declare that their products are deforestation-free, legally produced, and subject to completed due diligence.

EU Member States are obliged to designate a competent authority to enforce the EUDR through **risk-based market surveillance**, making use of the Information System (Art. 14 (1), 16 EUDR). This includes annual checks on operators, audits of documentation, scrutiny of due diligence procedures, verification of risk assessments, and – when necessary – on-site inspections (Art. 16 (3), 18 EUDR). If non-compliance is suspected, authorities may take **interim measures**, including market suspension or product seizure (Art. 23 EUDR). Confirmed violations must lead to penalties (Art. 25 (2) EUDR).

¹ Regulation (EU) 2023/1115

² The former refers to the permanent removal of forest cover and its conversion to agricultural use (Art. 2 (3) EUDR). The latter to “structural changes to forest cover”, where primary or naturally regenerating forests are converted into plantation forests or other wooded land (Art. 2 (7) EUDR)

Benchmarking risk: Country classifications under the EUDR

The EUDR's benchmarking system classifies producer countries of parts thereof into three categories: **low, standard, and high risk** (Art. 29 (1) EUDR). These classifications – based on each country's deforestation rates and forest governance – serve two key purposes. First, they **adjust the procedural burdens** for operators, whereby those sourcing from low-risk countries are exempt from the risk assessment and mitigation steps of the due diligence process. Second, they set the **minimum inspection thresholds**. Competent authorities must annually inspect 9% of operators and relevant volumes from high-risk, 3% from standard-risk, and 1% from low-risk countries (Art. 16 (8-10) EUDR). In May 2025, the Commission published the **first country risk classifications** (Commission Implementing Regulation 2025/1093, Annex). Belarus, Myanmar, North Korea, and Russia were designated as high risk. Fifty countries, including key exporters such as Brazil, Indonesia, and Malaysia, were classified as standard risk. The majority of countries, including all EU Member States, received a low-risk designation. The Commission plans to **review these classifications in 2026**.

1.3 Strategic opportunity: The window for impact is now

The EUDR marks a significant shift in the EU's approach to governing sustainability in global supply chains. Three features underscore its **regulatory significance**:

- **From legality to environmental outcomes:** Unlike the EU Timber Regulation (EUTR)³ and the Forest Law Enforcement, Governance and Trade Regulation (FLEGT)⁴, the EUDR prohibits products linked to deforestation or forest degradation, even if

land-use change was legal under domestic law.

- **Market access conditionality:** It ties environmental and legal compliance to trade access. Only products that are deforestation-free, legally produced, and supported by a due diligence statement may be placed on or exported from the EU market.
- **Mandatory traceability:** Operators must trace products back to the exact plots of land where the relevant commodities were cultivated. EU Member States are required to conduct risk-based compliance checks.

Due to these features and the EU's significance in international markets, the EUDR is anticipated to **reshape trade in forest risk commodities**, with its stringent import requirements likely to alter production patterns, restructure supply chain governance, and influence sustainability practices worldwide (Johnston et al., 2025).

The Commission estimates that by 2030, the EUDR could **prevent at least 29% of deforestation linked to EU consumption** of the seven core commodities, equivalent to preserving over 71,000 hectares of forest per year, roughly the size of Hamburg. The projected climate benefits are equally significant, namely an estimated 31.9 million metric tonnes of avoided carbon emissions per year, translating into **savings of at least €3.2 billion annually** (European Commission, 2021, p. 51). Independent studies support these projections: for instance, one recent study estimates that the EUDR could reduce deforestation in Argentina by 6.64% (de la Vega, 2024).

Whether these gains are realised hinges on whether the regulation is ambitiously **implemented**. Without political commitment and targeted improvements, there is a risk that the regulation will fall short of its potential (Murađian et al., 2025). The remainder of this policy brief identifies **key challenges and risks, and outlines recommendations** to ensure that the EUDR delivers on its environmental promise.

³ Regulation (EU) 995/2010

⁴ Council Regulation (EC) 2173/2005

2 Strengthening the EUDR for greater impact

2.1 Build enforcement capacity

While the EUDR sets high standards, its success will ultimately depend on **how rigorously EU Member States enforce it**. Experience with the EU Timber Regulation (EUTR), which the EUDR is set to replace, reveals structural weaknesses in enforcement across the EU. By 2019, six years after the **EUTR** entered into force, most competent authorities still had fewer than twenty staff members, and at least ten lacked a dedicated enforcement budget. This resulted in a monitoring ratio of just 0.31 %, meaning **fewer than one in 300 operators were subject to compliance checks** across the EU, with significant gaps between Member States (ClientEarth, 2021). To avoid repeating these failures, the EUDR needs to be supported by targeted investments in institutional capacity and a strong political commitment at both the EU and national levels.

Key recommendations:

- **Ensure sufficient capacity for enforcement:** National governments should equip competent authorities with the necessary staff, training, and resources to conduct risk-based inspections, verify due diligence statements, and, where necessary, conduct on-the-ground checks in countries of origin.
- **Enhance inter-agency and cross-border coordination:** EU Member States should improve collaboration among customs, environmental, and enforcement bodies, and establish formal mechanisms for coordination among competent authorities to harmonise implementation and share best practices.
- **Develop EU-wide guidance on verification tools:** The European Commission should issue guidance on verifying no-deforestation claims using satellite imagery, geospatial data, and supply chain documentation – to supplement and reduce dependence on field audits.



Fig. 2: Deforestation is a leading cause of both biodiversity loss and global greenhouse gas emissions (Credit: ClickerHappy/pixabay)

2.2 Strengthen compliance and accountability within the EU

The success of the EUDR depends not only on enforcement but also on the **capacity of operators to comply and the ability of civil society to hold both companies and regulators accountable**. Preparing due diligence statements requires navigating a fragmented data landscape: geospatial data are increasingly available but often fragmented, with inconsistent standards and definitions complicating their use (FAO, 2024). Even with clear EU guidance available, many operators – especially SMEs – require support to ensure consistent compliance, a challenge compounded when producers lack the capacity or resources to provide accurate geolocation data (Reboah et al., 2024). Transparency is equally crucial, as open access to enforcement data is key for enabling independent monitoring, fostering trust, and ensuring the regulation delivers measurable environmental outcomes.

Key recommendations:

- **Support compliance among operators:** Competent authorities should continue to offer regular, targeted training to operators – particularly SMEs – on collecting geolocation data, cooperating with producers, conducting risk assessments, and completing due diligence documentation.
- **Improve the EUDR Information System:** The European Commission should continue to ensure that the online platform for submitting due diligence statements is intuitive, accessible, and regularly updated in response to user feedback, especially from smaller firms with limited administrative capacity.
- **Enable independent oversight through open data:** The Commission should publish anonymised, machine-readable datasets from the Information System in accordance with the EU Open Data Policy. This would empower civil society organisations and researchers to monitor compliance, track enforcement trends, and evaluate the EUDR's impact on the ground.



Fig. 3: Forests are vital to the livelihoods of smallholders (Credit: Miguel Pinheiro/CIFOR)

2.3 Ensure distributive legitimacy through inclusive engagement

Regulatory legitimacy depends not only on the normative goals a policy pursues, but also on how its rules are designed, implemented, and how their effects are distributed. In the case of the EUDR, questions of **distributive legitimacy** are particularly salient, as the regulation affects numerous stakeholders, including smallholders in producing countries, who are not directly subject to its legal obligations but bear significant implementation burdens. Specifically, operators in the EU rely on smallholders to provide precise geolocation data and demonstrate that their production is deforestation-free.

The distributive implications are mixed. Over time, gaining ownership of compliance-relevant data could **strengthen smallholders' bargaining power in global supply chains** (European Commission Directorate General for Environment, 2023). However, in the short term, these requirements might impose considerable burdens on actors with limited financial and technical capacity (Melati et al., 2024). Recent studies have warned of **unintended consequences**, including land conflicts between large-scale and small-scale agricultural producers (Zhunusova et al., 2022) and the risk of trade diversion to markets with weaker environmental regulations (Brandt et al., 2024).

To mitigate these risks, the EU can **complement strict compliance obligations with a partnership-based approach** that supports equitable transitions in producer countries (Verhaeghe & Ramcilovic-Suominen, 2024). Article 30 of the EUDR provides a clear legal mandate for this, calling for the development of a comprehensive cooperation framework with producer countries – especially those classified as high-risk – using existing and future EU instruments to tackle the root causes of deforestation and forest degradation.

Key recommendations:

- **Provide targeted support for smallholders:** The EU and its Member States should continue to accompany enforcement with technical and financial assistance for digital

traceability tools, training, and locally grounded implementation, including mechanisms for free, prior, and informed consent. One option is to create a support fund financed through EUDR-related compliance fees.

- **Secure long-term engagement funding:** The EU and its Member States should ensure continuity of valuable initiatives such as the Team Europe Initiative on Deforestation-Free Value Chains, which helps partner countries in Asia, Africa, and Latin America establish enabling conditions for corporate action, supports smallholders and Indigenous communities, and mobilises private investment in sustainable agribusiness. With initiatives like the EUDR Engagement Project set to conclude in August 2025, new investments are necessary to sustain outreach, technical assistance, and political dialogue.
- **Empower smallholder cooperatives as compliance intermediaries:** Producer cooperatives – combining local embeddedness with organisational capacity – are effective intermediaries for both compliance and support delivery (Brandt et al., 2024). The Commission should expand targeted funding, training, and institutional capacity-building to these intermediaries – especially in high-risk regions – so that they can facilitate compliance, represent producers' interests, and manage traceability systems effectively.
- **Measure smallholder impacts rigorously:** The Commission should ensure the 2028 EUDR impact assessment uses disaggregated, quantifiable indicators – e.g., on market access, compliance costs, and supply chain participation – to inform potential regulatory adjustments.

2.4 Expanding the EUDR's scope for greater ecological impact

The EUDR is a breakthrough in regulating supply chain sustainability and a strong starting point for tackling the EU's contribution to global deforestation. There is **significant potential, however, to expand its scope over time** to better address

environmental risks that the regulation does not yet fully capture. The various **review mechanisms** embedded in the EUDR create a strategic opportunity to close these gaps, providing political openings to align the regulation with scientific evidence and on-the-ground realities before path dependencies set in (Trio & Mühlenhoff, 2025). Three areas for strengthening the regulation's ecological impact are particularly important.

First, while the EUDR's focus on forests is justified given that deforestation is a leading driver of biodiversity loss, **expanding its scope to other ecosystems** is crucial. Without a broader coverage, there is a risk of leakage, as protecting forests alone might shift land-use pressures to other vulnerable areas, such as Brazil's Cerrado, now heavily affected by soy expansion displaced from the Amazon (de Sa et al., 2013; Dou et al., 2018). The mandated reviews of ecosystem coverage in 2026 and 2027 provide an opportunity to extend protection to other wooded land, peatlands, wetlands, grasslands, and savannahs – ecosystems that are biodiversity hotspots and critical for carbon storage and hydrological stability (IPBES, 2019).

Second, the EUDR currently targets seven major commodities but **expanding its scope to other high-impact products** would enhance ecological coherence and close enforcement gaps. For instance, maize production contributes to forest loss in Latin America, while shrimp farming drives widespread mangrove destruction in Southeast Asia (Fülling et al. 2025). The mandated 2026 review offers a key opportunity to assess and add such commodities, ensuring that the regulation remains comprehensive and aligned with its environmental objectives.

Third, the current country **benchmarking system** strongly focuses on deforestation rates and EU sanctions, which risks overlooking key governance factors such as corruption, weak law enforcement, and systemic illegality – conditions that often enable deforestation to persist despite low official forest loss (Canby & Walkins, 2025). The scheduled review of the methodology offers a chance to tighten criteria to prevent that countries with significant institutional

weaknesses may be wrongly classified as low or standard risk (Jong, 2025).

Key Recommendations

- **Expand ecosystem coverage in line with Article 34 (1)-(2):** Following the 2026 review, include other wooded land. By 2027, extend the scope to non-forest ecosystems such as grasslands, wetlands, peatlands, and savannahs.
- **Widen the commodity list based on trade and ecological impact data:** Prioritise inclusion of maize, shrimp, and other commodities with proven links to deforestation or ecosystem degradation.
- **Strengthen benchmarking criteria:** In preparation for the 2026 review, place greater emphasis on governance and illegality risk indicators to ensure more accurate country classifications.

2.5 Embed the EUDR in a broader policy architecture

The EUDR's focus on agriculture-driven deforestation is justified, as agricultural expansion accounts for approximately 90% of global forest loss (FAO, 2022, p. 47). Nonetheless, it is not the only driver, as **infrastructure projects** – such as roads, dams, and pipelines – and **extractive industries** – including mining and fossil fuel development – often open access to remote forest areas, triggering both direct clearance and indirect land conversion (Kliem et al., 2019; Klimke, 2023). These drivers fall outside the EUDR's scope but should also be addressed to **tackle deforestation at its systemic roots**.

A genuinely systemic approach requires **embedding the EUDR in a broader policy architecture** that addresses the full spectrum of deforestation drivers. This means complementing the EUDR with regulatory action on upstream financial flows, non-agricultural land-use pressures, and demand-side dynamics in the EU.

Key recommendations

- **Target non-agricultural drivers of ecosystem destruction:** Develop complementary EU regulations to address deforestation linked to

infrastructure development, mining, and extractive industries. For instance, lessons can be drawn from the Critical Raw Materials Act (2024/1252) and related sustainability initiatives.

- **Green EU financial flows:** Introduce due diligence obligations for EU-based financial institutions that invest in forest-risk sectors in line with Article 34 (4), ensuring these align with deforestation-free principles.
- **Strengthen environmental safeguards in trade and investment:** Make forest protection an enforceable component of EU trade agreements, and use trade leverage to support tenure security and forest governance in producer countries.
- **Advance domestic sufficiency-oriented policies:** The EUDR addresses supply-side sustainability but leaves the demand-side drivers of ecosystem destruction intact (Verhaeghe & Ramcilovic-Suominen, 2024). Complement the EUDR with sufficiency-focused measures that reduce overall material and land-use pressure, such as public procurement standards and consumption-reduction targets (Fülling 2025).

How to foster global collaboration and exchange? The One Planet network

The One Planet network is a **global community of practitioners, policymakers and experts** that work towards achieving Sustainable Development Goal 12: “Ensuring sustainable patterns of consumption and production”.

Within the One Planet network's Programme on Consumer Information, the **Working Group “Biodiversity & Consumption”** strives to help reduce the negative impacts of consumption on nature, by activating stakeholders, strengthening collaboration and providing many ready-to-use information materials.

Find out more: www.oneplanetnetwork.org/programmes/consumer-information-scp/biodiversity

3 Conclusion

Designed to curb the EU's role in global forest loss, the EUDR only allows products that are proven to be free from deforestation or forest degradation to be placed on, or exported from, the EU market. It targets seven high-risk commodities, mandates geolocation-based due diligence, and introduces binding compliance obligations. While its legal architecture is robust, **the EUDR's success hinges on how it is implemented and enforced across EU Member States and producer countries**. This policy brief outlined five pillars for strengthening the regulation: (1) build enforcement capacity across Member States through staffing, training, and coordinated guidance; (2) support operators and enable civil society oversight through improved compliance tools and open data access; (3) ensure global legitimacy by supporting smallholders with financial and technical assistance, and measuring distributional impacts; (4) expand the EUDR's scope to other ecosystems and commodities, using review clauses as openings; and (5) embed the EUDR in a wider policy architecture that targets financial, infrastructural, and consumption-driven causes of ecosystem destruction. Together, these measures can transform the EUDR from a compliance mechanism into a **cornerstone of the EU's global sustainability strategy**, aligning trade, finance, and consumption with planetary boundaries.

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