

How Voluntary Certification Systems Support the Forest and Wood Products Industry with EUDR Compliance

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Introduction

As introduced in prior Dovetail articles¹, the European Union Deforestation Regulation (EUDR) (Regulation (EU) 2023/1115) requires operators to exercise and demonstrate due diligence in avoiding deforestation, forest degradation, and illegal processing of seven commodities. The Regulation requires detailed data collection, traceability through the supply chain, risk assessment, risk mitigation, and reporting. The forest products industry has decades of experience with these activities through voluntary participation in certification programs, including the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), Sustainable Biomass Program (SBP), and Sustainable Forestry Initiative (SFI). This report outlines the requirements of EUDR, their intersect with certification, and how these four certification programs have adapted their systems to support certificate holders in demonstrating compliance with the EUDR.

About the EUDR

The European Union Deforestation Regulation (EUDR)² was adopted as law, for all EU member states, by the European Commission (EC) in June 2023 as part of the Green Deal. The regulation “aims to ensure that a set of key goods placed on the EU market will no longer contribute to deforestation and forest degradation,”³ which are considered key drivers of climate change and biodiversity loss. The EUDR requires EU importers and exporters of forest-risk commodities to provide evidence of the source of the commodity and demonstration of negligible risk of deforestation. There are currently seven commodities included in the Regulation: cattle, cacao, coffee, oil palm, natural rubber, soya, and wood. Products that are made of or contain any of these commodities *and* are listed in Annex I⁴ of the Regulation are subject to the law. This report focuses only on wood products.

The EUDR repeals the EUTR (European Union Timber Regulation, Regulation (EU) 995/2010) which was adopted in 2010 and was focused on excluding illegally harvested timber from the EU market. The EUDR is still designed to exclude illegally harvested timber but goes beyond

¹ Do You Export to Europe? Urgent Attention to EUDR Needed (April 2024); EU Deforestation Regulation: Is the European forest products industry content? NO! (August 2024)

² Regulation (EU) 2023/1115, https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en

³ Commission strengthens support for EU Deforestation Regulation implementation and proposes extra 12 months of phasing-in time, responding to calls by global partners (Oct 1, 2024) https://ec.europa.eu/commission/presscorner/detail/en/ip_24_5009

⁴ Regulation (EU) 2023/1115, Annex I, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115&qid=1687867231461#d1e32-243-1>

that by excluding products that were sourced on deforested or degraded forest land and expanding the scope to also include six agricultural commodities (mentioned above) that are linked to deforestation.

Any forest area cleared after 31 December 2020 and converted into agricultural land is considered deforested for the purposes of the EUDR. The 'EU Observatory on Deforestation and Forest Degradation' has provided a baseline map that shows global forest cover for the year 2020 at 10 m spatial resolution⁵ that may be used by companies and/or EU member state Competent Authorities to check for deforestation.



EUDR Requirements

Overview

The EUDR has an explicit focus on avoiding and preventing the sourcing of products from deforestation, however, the regulation also covers forest degradation and legal compliance. Broadly, the Regulation requires operators to submit a Due Diligence Statement to the EU Competent Authorities that demonstrates that they have: 1) collected all necessary information and data about the origin and supply chain, 2) assessed the risk of deforestation and forest degradation and legality of production, and 3) mitigated any identified risks and concluded that there is a negligible risk (i.e., no cause for concern) of the product not being in compliance with the Regulation. See Annex I of this document for a more detailed summary of the EUDR requirements.⁶

Key Definitions

To fully understand the requirements of the EUDR and how certification organizations need to align their systems to it, it is important to consider the definitions of some of the key terms (Regulation (EU) 2023/1115, Article 2).

The EUDR has adopted the FAO definition of *forest*:

'forest' means land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10%, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use;

The EUDR definition of 'deforestation' is limited to the conversion of forest to agricultural use, whether human-induced or not (i.e., forest cleared by humans, or as a result of a natural disturbance such as wildfire and then used for agriculture), with an effective date of 31 December 2020. This means that relevant commodities sourced from a *plot of land* that met the FAO/EUDR definition of a *forest* on 31 December 2020, that is thereafter converted to agricultural land, is prohibited from sale in the EU.

⁵ Global Forest Mapping and Monitoring, <https://forest-observatory.ec.europa.eu/forest>

⁶ The EUDR was originally set to take effect on 30 December 2024. Based on feedback from international parties and member states concerned about their readiness for implementation, on 1 October 2024 the EU Commission proposed to the European Parliament and the European Council a 12-month extension of the effective dates, which would make the law applicable on 30 December 2025 for medium and large companies and 30 June 2026 for micro- and small enterprises. The proposal was approved on 14 November 2024. See "EU deforestation law: Parliament wants to give companies one more year to comply" <https://www.europarl.europa.eu/news/en/press-room/20241111IPR25340/eu-deforestation-law-parliament-wants-to-give-companies-one-more-year-to-comply>.

The EUDR definition of ‘forest degradation’ looks narrowly at primary and naturally regenerating forests:

‘forest degradation’ means structural changes to forest cover, taking the form of the conversion of: a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or b) primary forests into planted forest;

This part of the EUDR is currently poorly understood and the overall impact will depend upon the interpretation of the terminology (i.e., primary forests, natural regenerating forests, plantation forests, other wooded land, and planted forest). The impact could be quite broad in some nations, including the US, where the majority of forestland is naturally regenerated (approximately 70% of US forestland is naturally regenerated and not reliant on planting following harvest). Other nations, such as Canada, are considered by some definitions to have significant areas of primary forest. Certification programs already have requirements related to monitoring regeneration methods (planting and natural regeneration), protection of intact forest landscapes and high conservation value forests, and identification of plantation forests. However, it is not clear that the current definitions, interpretations, and systems of reporting within each certification program align with the EUDR.

Origin and Traceability Requirements

The EUDR requires traceability data down to the ‘plot of land’⁷ and the date or time range of production. The EUDR requires polygon geolocation data of each plot, or latitude and longitude for plots less than four hectares. Aggregated traceability is allowed⁸ and would be appropriate for most mixed wood products.

Risk assessments

A key component of implementation of the EUDR is a risk assessment. The EU Commission has committed to developing a benchmarking system that classifies countries, or parts thereof, as high, standard, low, or no risk⁹ in terms of commodities not being produced in compliance with the EUDR. The classification of the source country(ies) affects the level of due diligence required by the operator/trader. Products from high-risk countries will be subject to more stringent checks by the competent authorities.¹⁰ The results of the EU Commission’s country benchmarking are expected to be released by 30 June 2025.¹¹

Who is affected

Operators and traders placing a relevant product on the market in the EU are legally required to comply with the Regulation, but they cannot do so without the support of their supply chain – going all the way back to the source of the relevant commodities – so companies all over the globe are affected by the Regulation. Throughout this report, reference is made to

⁷ ‘Plot of land’ means a land area with a single ownership or use right and where the conditions affecting the risk of deforestation and forest degradation are homogenous (See [Regulation \(EU\) 2023/1115](#) for the formal definition) and EUDR FAQ, 3rd Iteration (October 2, 2024), Q4.2 [What does ‘plot of land’ mean?](#)

⁸ EUDR FAQ, 3rd Iteration (October 2, 2024), Q1.3 and 1.17 includes guidance on declaring the place of production for ‘bulk-traded’, ‘composite products’, and ‘mixed goods’. See also [EUDR Myths vs. Reality](#).

⁹ On 14 November 2024 Parliament adopted the fourth category of “no risk” for “countries with stable or increasing forest area development” See [“EU deforestation law: Parliament wants to give companies one more year to comply”](#)

¹⁰ The EU Commission has committed to working with countries classified as high-risk to address jointly the root causes of deforestation and forest degradation.

¹¹ Date revised from 30 December 2024. See [“EU deforestation law: Parliament wants to give companies one more year to comply”](#)

“affected” companies or certificate holders. This means operators and traders who are legally required to comply with the Regulation as well as suppliers (and suppliers of suppliers) to such organizations.¹²

The Role of Voluntary Certification Systems

The EU Commission has made clear that there is no ‘green lane’ for any certification scheme, meaning that there is no certification that can be used to demonstrate full EUDR compliance. However, the EUDR FAQ states that “certification schemes can be used by supply chain members to help their risk assessment to the extent the certification covers the information needed to comply.”¹³

The voluntary certification systems included in this report – Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), Sustainable Biomass Program (SBP), and Sustainable Forestry Initiative (SFI), are all established organizations with requirements that cover legality and sustainability of managed forests and have Chain of Custody (CoC) traceability and due diligence systems in place to get certified forest products to the market with credible certification claims. Although they are each well-positioned to meet many of the key elements of the EUDR, due to the specificities of the Regulation, none of them met all requirements entirely at the time when the EUDR came into law. This was confirmed in an analysis¹⁴ conducted by a group of researchers from the University of Padova, Italy, that identified the gaps between the EUDR requirements and the systems and requirements of leading voluntary sustainability standards¹⁵ for each of the commodities included in the scope of the EUDR. Since enactment of the EUDR in June 2023, each certification organization has conducted their own analysis and deemed it necessary to provide an EUDR-aligned approach to support their certificate holders with EUDR compliance.

Certification programs addressed in this report:

Forest Stewardship Council (FSC) <https://fsc.org> A global program, established in 1993, provides forest management certification, chain of custody certification, and controlled wood certification and risk assessments.

Programme for the Endorsement of Forest Certification (PEFC) <https://pefc.org> A global program, established in 1999, providing an endorsement for qualifying national forest management standards, and a chain of custody certification standard.

Sustainable Biomass Program (SBP) <https://sbp-cert.org/> A global program, established in 2003, provides assurance that woody biomass for industrial, large-scale energy production, is sourced both legally and sustainably.

Sustainable Forestry Initiative (SFI) <https://forests.org/> A North American program, established in 1995, and endorsed by PEFC in 2005, provides forest management certification, chain of custody certification, and certified fiber sourcing.

¹² The regulation does not apply to product packaging, unless the packaging is the product being placed on the EU market and is made from a relevant commodity (see EUDR FAQ 2.5). Also, recycled material is not included, so products made with 100% recycled content are exempt from the EUDR (see EUDR FAQ 2.8).

¹³ EUDR FAQ, 3rd Iteration (October 2, 2024), 5.7 <https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/e126f816-844b-41a9-89ef-cb2a33b6aa56/details>

¹⁴ The study was published in the journal of Forest Policy and Economics (164, 2024) Voluntary sustainability standards to cope with the new European Union regulation on deforestation-free products: A gap analysis.

¹⁵ The analysis included: Fairtrade, FSC, Rainforest Alliance, Roundtable on Sustainable Palm Oil (RSPO), and Roundtable on Responsible Soy (RTRS)

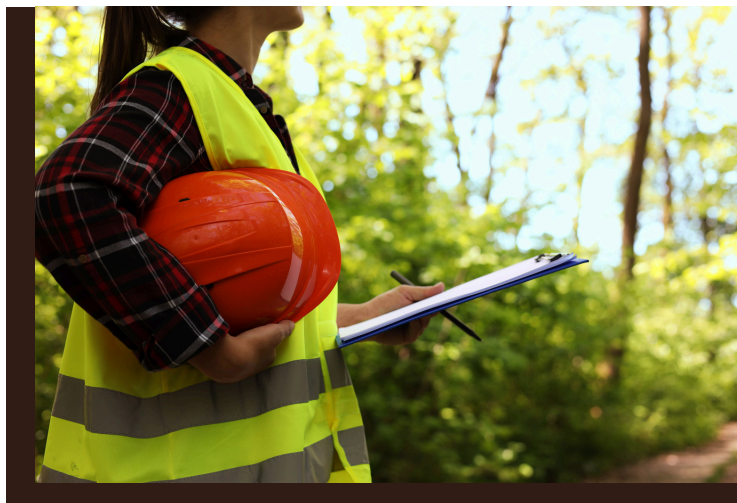
The following is an overview, based on publicly available information, of each forest certification organization's approach to aligning their system with the EUDR, including the key changes to their system and the tools and/or guidance they have developed to support their affected certificate holders in complying with the Regulation.

FSC's Approach

To align with the EUDR, FSC made some changes to its global certification system that are applicable to all certificate holders, and has developed a voluntary module that affected entities can add on to their existing forest management, CoC, or Controlled Wood certification. Also, FSC is in the process of developing additional tools and guidance.^{16, 17}

FSC introduced several system-wide changes through a series of advice notes that became effective on 1 October 2024, and a revised

procedure for the development of risk assessments, effective as of 1 July 2024. The five new advice notes: a) reintroduce the term 'primary forest' into the FSC system – following FAO's definition (also adopted by the EUDR),¹⁸ b) close gaps to ensure that forest products that are not in compliance with the EUDR are not permitted to be sold with an FSC claim,¹⁹ c) provide instructions on how to add *Regulatory Claims* to the scope of FSC product groups,²⁰ and d) align terms related to risk and risk mitigation and introduce the revised Risk Assessment Framework for companies conducting 'Extended Company Risk Assessments' to avoid mixing FSC certified material with controversial sources.²¹



FSC Aligned Certification for EUDR is FSC's optional module, comprised of the FSC Regulatory Module and the FSC Risk Assessment Framework:

The *FSC Regulatory Module* is a set of requirements that an FSC certificate holder can add to the scope of their certificate at their regularly scheduled audit or via a desk-based audit. As described by the FSC, "The FSC Regulatory Module sets the framework and requirements to: introduce a due diligence system to support EUDR compliance, including information collection, risk assessment and risk mitigation, gather and transmit precise information on the origin of products, including geolocation and time of production, and ensure that only deforestation-free material enters the FSC chain of custody."²²

¹⁶FSC Aligned Certification for EUDR and system-wide changes now live: <https://fsc.org/en/newscentre/eudr/fsc-aligned-certification-for-eudr-and-system-wide-changes-now-live>

¹⁷In October 2022 at the 9th General Assembly, the FSC membership approved changes to the FSC Principles and Criteria to implement a revised Policy to Address Conversion which aligned the 'cut-off date' for conversion to that of the EUDR (1 December 2020) and provides an option to remedy social and environmental harms caused by conversion that occurred between 1 December 1994 and 31 December 2020. See FSC Advice-20-007-22.

¹⁸FSC Advice-20-007-02 V3-0 Certification of primary forests

¹⁹FSC Advice-20-007-24 Deforestation-free products from FSC-certified forest management units

²⁰FSC Advice-40-004-26 Inclusion of the FSC Regulatory Claim

²¹FSC Advice-40-005-27 Use of FSC-PRO-60-006b Risk Assessment Framework and FSC Advice-20-011-19 Evaluation of the use of FSC-PRO-60-006b Risk Assessment Framework.

²²FSC Regulatory Module FSC-STD-01-004. <https://connect.fsc.org/document-centre/documents/resource/1951>

The *Risk Assessment Framework* (FSC-PRO-60-006b) is a procedure for the development of risk assessments. FSC's standard Requirements for Sourcing FSC Controlled Wood (FSC-STD-40-005), in place since 2004, already incorporates a due diligence system where companies sourcing non-FSC certified wood/fiber are required to know the origin of their sources, conduct an assessment, and mitigate identified risks. The FSC has revised its procedure to align its risk assessments with those required by the EUDR. In the revised procedure, FSC has adopted EUDR terminology for risk designations as 'negligible risk' (in place of 'low risk') and 'non-negligible risk' (in place of 'specified risk') and will review its risk assessments annually instead of once every five years. Another notable change is that mitigation measures will be established for each instance where non-negligible risk is identified. FSC's new risk assessments will be provided as data sets in a 'Risk Hub' (under development) for improved accessibility and will include GIS maps showing the risk areas.²³

FSC is also developing a traceability platform, *FSC Trace*, built on blockchain technology that "enables participants to confidentially, flexibly, and efficiently access and exchange relevant data to assist with verification, due diligence and demonstrate conformity with evolving regulations."²⁴ The platform is expected to be available to FSC certificate holders and those with an FSC promotional license by the end of 2024. Once the platform is fully functioning and there is sufficient supply chain participation, the system will compile relevant data into a due diligence report and statement that can be used to demonstrate compliance with EUDR. The intention is for FSC Trace to be integrated through an Application Programming Interface (API) with the *EUDR Due Diligence Registry* (a.k.a. the 'Information System') so that certificate holders can submit their completed due diligence statements directly to the EU competent authorities.

When every certificate holder in a supply chain is certified to the *FSC Regulatory Module*, it will be possible for a product to carry one of two special *Regulatory claims*: "Regulatory+" / "REG+" – where 100% of the wood is from FSC-certified forests and has been segregated throughout the supply chain; or "Regulatory" / "REG" – for FSC Mix products that include FSC certified content and other controlled sources. FSC has also provided promotional statements that can be used, e.g., "We use FSC® to trace our [material] back to the forest, to ensure that our [product] is deforestation-free ([fsc.org/reg](https://www.fsc.org/reg))."

FSC provides its certificate holders, certification bodies, and members with regular updates on EUDR developments and offers several resources to support certificate holders with compliance. To see the latest news and information from FSC on their EUDR solutions here: www.fsc.org/EUDR.

²³ EUDR Compliance Countdown - FSC Webinar 2 October 2024 <https://www.youtube.com/watch?v=VyxgijdvZOO>

²⁴ FSC Trace, <https://fsc.org/en/fsctrace>

PEFC's Approach

To align with the EUDR, PEFC has proposed changes to its global certification system that will affect all certificate holders and has released a new module standard that Chain of Custody (CoC) certificate holders can voluntarily add to their existing PEFC CoC certification.

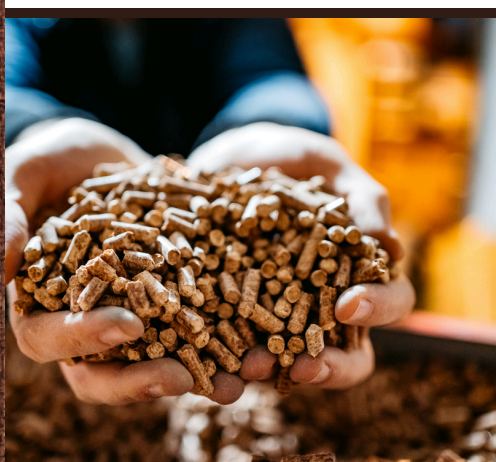
PEFC is working to revise its *Sustainable Forest Management Benchmark standard* (PEFC ST 1003), which is used to assess national standards for PEFC recognition, to ensure that raw materials coming out of a PEFC-certified forest also comply with EUDR requirements. Proposed changes include alignment of key definitions with those of the EUDR (e.g., forest, primary forest, planted forest, forest degradation, deforestation-free), and requiring the sharing of geolocation data.²⁵ Once approved, recognized national standards will need to be updated to comply with the new benchmark.²⁶

PEFC's new optional module, *Requirements for the Implementation of PEFC EUDR Due Diligence System* (PEFC ST 2002-1:2024), was approved on 20 July 2024 and is now available to PEFC CoC certificate holders.²⁷ It aligns key definitions with those of the EUDR, and includes requirements to implement an EUDR-compliant due diligence system and to make *PEFC-EUDR claims*.

Instead of developing their own IT platform for data collection, analysis, and sharing, PEFC is partnering with third-party service providers who offer a range of Earth Observation and traceability solutions to support EUDR compliance.

PEFC has hosted several webinars to promote their EUDR solutions and provide updates to their certificate holders and members, and to introduce their partner service providers. More information and guidance is available on their website: <https://pefc.org/eudr>.

SBP's Approach



SBP's certification system has a fully integrated data system – the *SBP Data Transfer System* (DTS). In place since 2018, the DTS tracks all transactions of SBP certified material through the supply chain. SBP certificate holders are accustomed to using the DTS to upload data that is required for SBP certification and compliance with sustainability regulations related to the calculation of greenhouse gas emissions reduction from woody biomass such as the Renewable Energy Directive 2018/2001 (REDII).

²⁵ PEFC: on the path to EUDR alignment <https://cdn.pefc.org/pefc.org/media/2024-03/12cf868d-6384-4932-b069-98850e6228ed/42783019-0625-59fe-b027-47de80a20e2e.pdf>

²⁶ FAQ: PEFC's alignment with EUDR, 4 and 5: <https://cdn.pefc.org/pefc.org/media/2024-03/33fbb629-d01d-4489-a07d-8520690866a5/82e6bbfb-3be1-5959-b037-7174f40218e7.pdf>

²⁷ PEFC EUDR DDS module: <https://cdn.pefc.org/pefc.org/media/2024-07/0c915377-ddb0-4d5f-80cb-c7c0c5cf8ac0/cd2bc00e-fd16-5fa2-a65c-8744942169f8.pdf>

To support its certificate holders in providing required EUDR data along the supply chain, SBP, in collaboration with Global Traceability Solutions (GTS), has developed a voluntary EUDR add-on module for its DTS. The module assists SBP certificate holders with information gathering and sharing, risk assessments, risk mitigations, and submission of their completed Due Diligence Statements to the EU Information System. This module is not part of SBP's certification system, so voluntary conformance with the SBP EUDR module will *not* be assessed as part of a certificate holder's SBP audit.

The EUDR module can be used to two ways: 1) by the producer/supplier to provide necessary source and supply chain data through the *Supply Chain Map builder* tool (see below), and 2) by operators and large traders to gather the information from their supply chain, conduct their risk assessment and any necessary risk mitigation, compile their Due Diligence Statement, and upload it to the EUDR Information system.

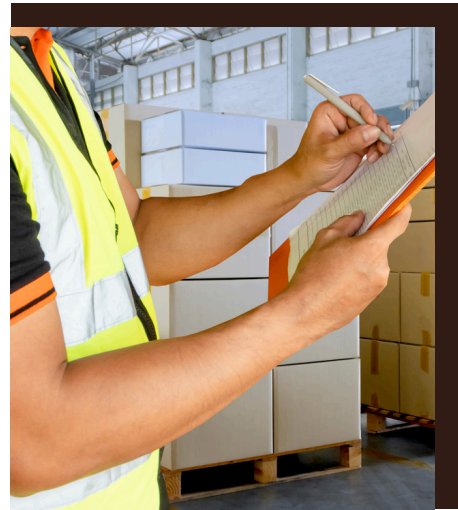
The *iSupply Chain Map builder* is an interactive tool for biomass producers to visualize their whole supply chain for a period of time, or for a specific consignment. Companies can review the data collected and shared by their suppliers in a new type of transaction called the 'EUDR transaction', which consolidates the data from suppliers' Supply Chain Maps (e.g., tree species, locations and time period of harvest). Using this data, the system generates an EUDR risk assessment report, called an EUDR Governance Report, which assesses the risk classification of the country (countries) of production, the presence of Indigenous Peoples, the extent of deforestation or forest degradation, and issues such as corruption, fraud, human rights violations, etc. SBP intends to enable automated uploads from SBP's DTS to the EU's Information System through an API.



The EUDR module, launched at the beginning of November as a free trial for all certificate holders through the end of 2024, can be used directly by the certificate holders or they may choose to use GTS as an Authorized Representative to assist them in their due diligence, risk assessment and due diligence statement submission processes. After the trial period separate license fees will apply, based on the specific functionality used by the individual certificate holder.

SFI's Approach

To align its certification system with the EUDR, SFI made changes to its certification system that affect all certificate holders and developed two modules that certificate holders can voluntarily add to their existing SFI certification. Specifically, SFI adopted formal definitions for “deforestation” and “forest degradation” for its forest management standard that align with those of the EUDR. Also, the SFI Board established a policy that prohibits “certification to SFI 2022 Forest Management Standard on lands that are deforested and on practices that are causing forest degradation after December 31, 2020.”²⁸



For companies certified to the *SFI 2022 Fiber Sourcing Standard* who need to comply with the EUDR, SFI developed the *SFI Fiber Sourcing Module to Support EUDR Due Diligence Requirements*. This module includes relevant EUDR definitions and includes an additional voluntary objective – “Objective 12. Avoid EUDR Non-Compliant Sources” with six performance measures that align with relevant requirements of the EUDR.²⁹

For companies certified to the *SFI 2022 Chain of Custody Standard* who need to comply with the EUDR, SFI developed the *SFI Chain of Custody Module to Support EUDR Due Diligence Claims*.³⁰ Again, the module includes relevant EUDR definitions and includes two voluntary claims related to EUDR Due Diligence: “Supporting EUDR Due Diligence” – to indicate that products meet the information collection, risk assessment, and due diligence requirements of the EUDR; and “Supporting EUDR Information Collection” – to indicate that the products meet the information collection requirements of the EUDR.

These two voluntary modules are available as optional add-ons to the scope of existing *SFI Fiber Sourcing* and *SFI Chain of Custody* certification.

²⁸ SFI Is Taking a Firm Stance Against Deforestation/Forest Degradation, <https://forests.org/sfi-on-forest-deforestation/>

²⁹ SFI Fiber Sourcing Module to Support EUDR Due Diligence Requirements, https://forests.org/wp-content/uploads/2022_SFI_Standards_Optional-EUDR.pdf

³⁰ SFI Chain of Custody Module to Support EUDR Due Diligence Claims, https://forests.org/wp-content/uploads/2022_SFI_Standards_ChainofCustody-EUDR.pdf

Conclusion

The EU Commission has made clear that they will not endorse any certification system but has stated that “certification schemes can be used by supply chain members to help their risk assessment to the extent the certification covers the information needed to comply.”³¹ Although FSC, PEFC, SBP, and SFI were each well-positioned to meet many of the key elements of the EUDR, due to the specificities of the Regulation, none of them met all requirements entirely at the time when the EUDR came into law. Since then, each certification program has undertaken strategies to adapt their systems to ensure that products sold with their certification mark comply with the regulation. Each program has provided unique solutions to support their certificate holders. The efficacy as well as the limitations of these approaches will be seen as they are fully rolled-out and implemented throughout global supply chains.

Annex I: Summary of EUDR requirements

The following is a summary of the requirements of Regulation (EU) 2023/1115 of the European Parliament and the European Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 – a.k.a. the European Union Deforestation Regulation (EUDR).

EUDR *Article 3* requires that relevant products shall not be placed on the EU market or exported from the EU market unless those products:

- a) are deforestation-free, meaning:
 - i. not produced on land that was deforested after 31 December 2020, and
 - ii. wood harvested after 31 December 2020 did not induce forest degradation;
- b) have been produced in accordance with the relevant laws and regulations of the place of production (i.e., country, state, and/or local), in terms of:
 - i. land use rights,
 - ii. environmental protection,
 - iii. forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting,
 - iv. third parties' rights,
 - v. labour rights,
 - vi. human rights protected under international law,
 - vii. the principle of free, prior, and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples, and
 - viii. tax, anti-corruption, trade, and customs regulations; and

³¹ EUDR FAQ, 3rd Iteration (October 2, 2024), 5.7 <https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/e126f816-844b-41a9-89ef-cb2a33b6aa56/details>

c) are covered by a due diligence statement, that includes (*Article 8*):

i. collection of information, data, and documents, needed to fulfil the requirements set out in *Article 9*, e.g.,:

- geolocation of all plots of land and date or time range of production,
- name and address of the supplier(s) and customer(s),
- verifiable information that the products are deforestation-free;

ii. risk assessment measures as referred to in *Article 10*, e.g.,:

- prevalence of deforestation or forest degradation,
- consultation and cooperation with indigenous peoples (where present),
- concerns such as level of corruption, data falsification, armed conflict, sanctions imposed; and

iii. risk mitigation measures as referred to in *Article 11*, e.g.,:

- independent surveys or audits,
- documented policies, controls and procedures to effectively mitigate and manage the identified risks of non-compliance.



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