



The EU Deforestation Regulation

**FEP webinar
3 July 2024**

Deforestation Regulation

- To prevent placement on the EU market of products from deforestation and forest degradation (supersedes the EU Timber Regulation); **books are in the scope**
- Entry into force 29/06/23; application 18 or 24 months later (large & medium companies/small & micro): **30 December 2024/30 June 2025**
- Obligations for operators and traders – esp. for publishers who buy paper / print books outside EU and for exporters
- Core requirements: deforestation-free (as of 31/12/2020); accordance with relevant legislation of country of production; due diligence statement
- Due diligence: documentation (traceability, including geo-location), risk assessment, risk management
- European Commission published set of [FAQs](#) (updated regularly) and will issue guidelines (soon?)
- European Commission to develop Information System to allow information flow and a benchmarking of countries based on levels of risk of deforestation
- EU Observatory on deforestation and forest degradation
- JRC published a [Map of Global Forest Cover 2020](#)

Deforestation Regulation

- **Many questions still open**

- IS planned to be ready just weeks before entry into application – and will it be adequate?
- Benchmarking might not be ready at all before then
- Clarifications needed on several elements, including “placing on the market”, “shipment”, “ascertaining the due diligence”, etc.
- Is a postponement feasible?

- **FEP**

- Sustainability Working Group
- Joined Commission’s Deforestation Multistakeholder platform, contributing to work on guidelines
- Initiated a deforestation WG within the Print Media Group (with CEPI, Intergraf, ENPA/EMMA, NME)

- **Publishers/PAs**

- Start preparing now!
- Talk to your suppliers
- Rely on EU Timber Regulation compliance tools as much as possible
- Get in touch with your surveillance authorities

- ▶ More in-depth information below...

Deforestation Regulation

- **Latest news/clarifications**

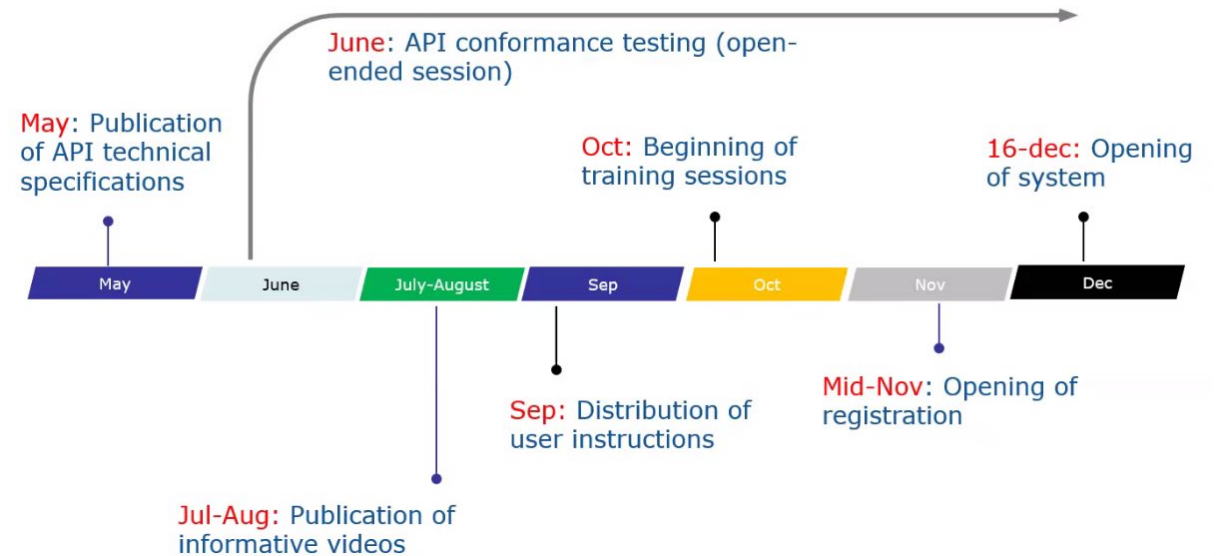
- **Information System**

- Timeline
- API technical specifications are out
- API conformance testing is open (publishers are invited to participate)

- **Due Diligence Statement**

- Same info as in customs declaration + geolocation (operator's name & address, EORI n°; Harmonised System code, scientific name, quantity; country of production & geolocation; reference n° of upstream DDS if applicable)
- Before placing on market; DDS n° must be in customs declaration
- Geolocation data in GGeoJson format

DDS Information System - Next steps



Note: opening of system moved to 2 December

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Operator	
<p>A natural or legal person who places relevant products on the market (incl. via an import) or exports them in the course of commercial activity. This definition also covers companies that transform one relevant product (already been the object of due diligence) into another relevant product.</p>	
Non-SME	SME
<p>Due Diligence System</p> <ul style="list-style-type: none"> ✓ Information & Due Diligence Statement ✓ Risk assessment ✓ Risk mitigation <p>For low-risk countries: simplified due diligence (no risk assessment/mitigation).</p>	<p>Due Diligence System</p> <ul style="list-style-type: none"> ✓ Information & Due Diligence Statement ✓ Risk assessment ✓ Risk mitigation <p>For low-risk countries: simplified due diligence (no risk assessment/mitigation).</p>

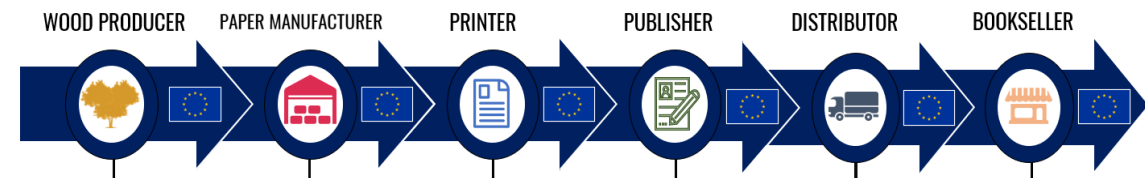
Deforestation Regulation

Downstream Operator	
Operators further down the supply chain (“downstream” operators) are those who transform a relevant product (already been subjected to due diligence) into another relevant product.	
Non-SME	SME
Due Diligence Statement (can reference upstream Due Diligence Statement upon “ascertaining” it complies with Regulation).	No due diligence (for products/parts thereof already subject to it). Provide due diligence reference numbers obtained from previous steps in the value chain.
Trader	
A person in the supply chain, other than an operator, who makes the products concerned available on the market in the course of a commercial activity.	
Non-SME	SME
Due Diligence Statement (can reference upstream Due Diligence Statement upon “ascertaining” it complies with Regulation).	No due diligence. Collect information on upstream and downstream operators/traders.

Deforestation Regulation

- **Latest news/clarifications**

- Clarifications needed on several elements
 - “Placing on the market”: who is the operator? (FEP scenarios **under assessment by Commission and Member States – not to be taken as certain for now**)
 - “Shipment”: how many DDS? **Commission agrees on aim to minimise the number (one per print run? per printer order?)**
 - “Ascertaining”: not do the DD all over, but make sure upstream operators have valid and up-to-date system in place
- FAQs updated every few months
- Guidelines in inter-service consultation, out soon (?)



Note: the examples given below are an FEP interpretation, subject to assessment by the Commission and the Member States

BOOK VALUE CHAIN (WITHIN THE EU)

WOOD PRODUCER

PAPER MANUFACTURER

PRINTER

PUBLISHER

DISTRIBUTOR

BOOKSELLER



Operator

- DD obligation
- Submits DD statement
- Receives DD statement reference number

Large Downstream Operator

- DD *check* obligation
- Submits DD statement based on previous reference number
- Receives DD statement reference number

Large Downstream Operator

- DD *check* obligation
- Submits DD statement based on previous reference number
- Receives DD statement reference number

Large Trader

- DD *check* obligation
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BOOK VALUE CHAIN (WITHIN THE EU, SMEs)

WOOD PRODUCER

PAPER MANUFACTURER

PRINTER *SME*

PUBLISHER *SME*

DISTRIBUTOR *SME*

BOOKSELLER *SME*



Operator

- DD obligation
- Submits DD statement
- Receives DD statement reference number

Large Downstream Operator

- DD *check* obligation
- Submits DD statement based on previous reference number
- Receives DD statement reference number

SME Downstream Operator

- No DD obligation
- Receives DD statement reference number and makes it available on demand

SME Trader

- No DD obligation
- Information collection obligation
- Receives DD statement reference numbers and keeps record

SME Trader

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SME Trader

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BOOK VALUE CHAIN (WITHIN THE EU, publisher buys paper for the printer)

Publisher buys paper directly from the manufacturer



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PAPER MANUFACTURER

PRINTER

PUBLISHER

DISTRIBUTOR

BOOKSELLER



- Operator
- DD obligation
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- Large Downstream Operator
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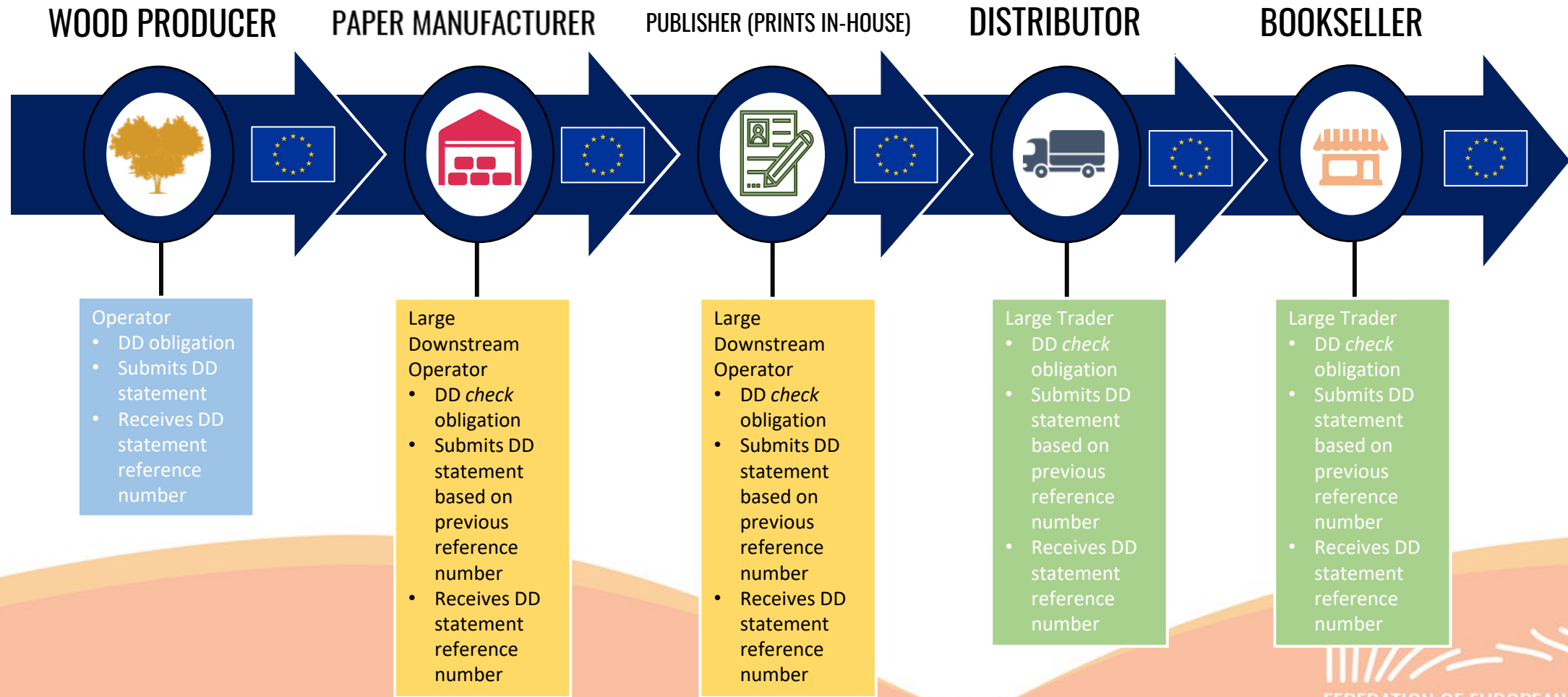
- Large Trader
- DD check obligation
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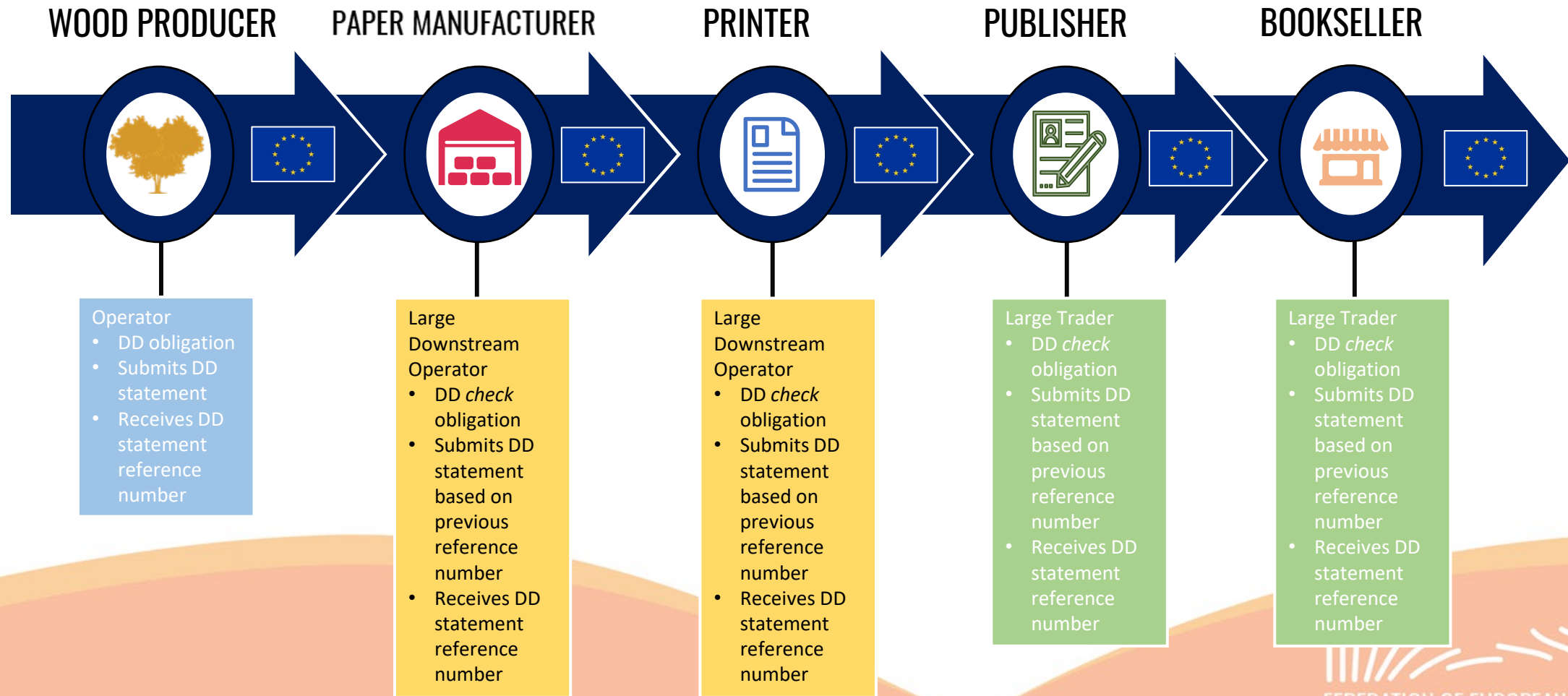
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BOOK VALUE CHAIN (WITHIN THE EU, without printer)



BOOK VALUE CHAIN (WITHIN THE EU, without distributor)



BOOK VALUE CHAIN (EU until distributor)

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PAPER MANUFACTURER

PRINTER

PUBLISHER

DISTRIBUTOR

BOOKSELLER



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Large Downstream Operator

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BOOK VALUE CHAIN (EU until distributor, SME)

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PAPER MANUFACTURER

PRINTER *SME*

PUBLISHER *SME*

DISTRIBUTOR *SME*

BOOKSELLER



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BOOK VALUE CHAIN (NON-EU until paper manu)

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PRINTER

PUBLISHER

DISTRIBUTOR

BOOKSELLER



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Large Trader

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BOOK VALUE CHAIN (NON-EU until paper manu, SME)

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PAPER MANUFACTURER

PRINTER *SME*

PUBLISHER *SME*

DISTRIBUTOR *SME*

BOOKSELLER *SME*



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Deforestation Regulation

- **Latest news/clarifications**

- Transitional periods, timelines
 - 31/12/2020: threshold date for deforestation
 - 29/06/23: entry into force
 - 31/12/24, 30/06/25: main obligations start applying to operators
 - Goods produced before and placed on the market after entry into application
 - Goods placed on the market after entry into application derived from commodities placed after entry into force
 - Supply chains with medium/big and micro/small players in-between application dates
- Is a postponement feasible?
 - Growing political pressure (Member States, Agriculture Commissioner, industry letters)

- **EDItEUR**

- Working on ONIX integration to communicate EUDR-relevant data along value chain
- Internal consultation ongoing, expected publishing in mid-July

- **Non-EU players**

- No obligation but need to provide information
- Supply chain in and out of EU

✓ **Everybody needs to get ready now**