

Updated January 2026

## Overview of Global and EU Deforestation Regulations

EUDR application dates postponed: New deadlines announced for all operators



### Summary

The European Union Deforestation Regulation (EUDR) affects both imports and exports and sets new supply-chain requirements for forest-risk commodities. Adopted in June 2023 and originally due to apply in December 2024, its implementation has now been postponed twice. The latest proposal, finalised and published on the Official Journal of the European Union (OJEU) on 23 December 2025, postponed the application date until 30 December 2026 for medium-sized and large operators and traders, and until 30 June 2027 for micro and small operators.

The delays are attributed to technical feasibility challenges, particularly related to IT infrastructure, and efforts to minimise trade disruption. The regulation's global significance is underscored by its dual impact on international trade and its connection to agreements such as the EU-Indonesia Comprehensive Economic Partnership Agreement, concluded in September 2025.

### EUDR key deadlines

- 30 Dec 2026 – Medium & large operators/ traders
- 30 Jun 2027 – Micro & small operators
- By 30 Apr 2026 – European Commission simplification review

# Anti-deforestation legislation globally

Non-Exhaustive



The image provides a high-level, non-exhaustive, overview\* of current mandatory regulations and voluntary disclosures.



## Global overview of deforestation rules

The EU is not the only region in the world working to adopt deforestation rules. Several other countries are already well ahead, having adopted national regulations. The new EU draft regulation has a major global impact for several reasons: the size of the EU market, the overlap with other regulations affecting the same commodities, and the inclusion of all imported and exported products within its scope.

## EU Regulation: State of Play

Included in the European Green Deal, the EU Biodiversity Strategy for 2030 and the Farm to Fork Strategy, the EU Regulation (EU) 2023/1115 on deforestation-free products (EUDR) promotes the consumption of 'deforestation-free' products in the EU and around the world (EU export is included) and the reduction of the EU's impact on global deforestation and forest degradation.

Under the Regulation, any operator or trader who places these commodities: cattle, wood, cocoa, soy, palm oil, coffee, rubber and some of their derived products (such as leather, chocolate, meat products, tyres, furniture) on the EU market, or exports from it, must be able to prove that the products do not originate from recently deforested land or have contributed to forest degradation.

Providing proof of deforestation-free origins for the commodities included is a necessary step to gain EU market access.

In December 2024 the European Union granted a 12-month additional phasing-in period, making the law applicable on 30 December 2025 for large and medium companies and 30 June 2026 for micro and small enterprises (except for timber).

21 October 2025: The European Commission proposed to:

- Keep the application date of 30 December 2025 for large and medium-sized enterprises
- Add a six-month enforcement grace period
- Set the application date of 30 December 2026 for small and micro enterprises

After the legislative process was completed:

- The EUDR amendments were published in the Official Journal of the European Union
- The application of the EUDR was postponed to:
  - 30 December 2026 for medium-sized and large operators and traders
  - 30 June 2027 for micro and small operators

A new legal provision now requires:

- The European Commission to carry out a simplification review of the EUDR
- Deadline for the review: 30 April 2026
- The amendments also introduce:
  - A simplified regime for downstream operators and traders
  - This category is now formally included in the Regulation





## Intersection between EUDR, Trade Agreements, and WTO Dispute Settlement on Palm Oil

Over the past decade, Indonesia has filed multiple complaints to the WTO on the EU's "unfair treatment of palm oil," all ruled in favour of Indonesia. The EUDR's potential discrimination and protectionism have been debated for a couple of years now, and, for example, different treatments between soybean and palm oil have been evoked. In addition to that, another risky area for EUDR implementation is represented by the EUDR risk-based mechanism to categorise different countries, and the potential inclusion of some countries instead of others on the list has been challenged by the palm oil sector.

## GS1 "Deforestation Regulation EUDR" Mission Specific Work Group

Back into March 2025, GS1 has launched a standardisation table to develop a global standard based on business and regulatory requirements. This standard will provide guidance on how to leverage GS1 Data Sharing standards to share the "Due Diligence numbers", and to support multiple level of granularity, enabling trading partners to share the data at batch or serial level as well as at product level, if compatible with the specific process.

The technical solution will support the GS1 identification keys like: GTIN for product identification, GLN for parties and location identification and SSCC for logistic units' identification.

The table is open for all to participate, no need to be a GS1 member ([join here](#)).

## Next steps

The amendments have been approved and published on the Official Journal of the European Union on 23 December 2025, and are available here: <http://data.europa.eu/eli/reg/2025/2650/oj>

Here follows a summary of the main changes approved:

- One year postponement
- European Commission to conduct a simplification review by 30 April 2026
- Traceability obligations are limited to the first downstream operator or trader, while a simplified regime is introduced for micro and small primary operators, based on a one-off declaration and the use of declaration identifiers instead of repeated due diligence statements.
- Minor adjustment to the products covered by the EUDR, with the removal of printed products

## Information resources for GS1 Member Organisations

- [Commissioner Roswall's Letter \(23 Sept 2025\)](#)
- [Regulation \(EU\) 2023/1115 on deforestation-free products](#)
- [EUDR debrief.pdf](#) (For MOs only who have access to Public Policy teams channel)
- GS1 GSMP Deforestation - European Union Deforestation Regulation [MSWG.https://www.gs1.org/standards/development-work-groups](https://www.gs1.org/standards/development-work-groups)
- Published amendments: <http://data.europa.eu/eli/reg/2025/2650/oj>

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