

Updated October 2025

Overview of Global and EU Deforestation Regulations

New EUDR deadlines: 30 Dec 2025 for large and medium size enterprises, 30 Dec 2026 for micro and small enterprises



Summary

The European Union's Deforestation Regulation (EU) 2023/1115, which impacts both imports and exports, aims to address global deforestation complexities by regulating supply chains associated with forest-risk commodities. Initially adopted in June 2023 with an application date of December 2024, the regulation has faced two major postponements. The latest proposal, dated 21 October 2025, maintains the compliance deadline of 30 December 2025 for large and medium size enterprises with a six-month enforcement grace period and extends it to 30 December 2026 for small and micro enterprises, pending final approval by the European Parliament and Council.

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 Deadlines

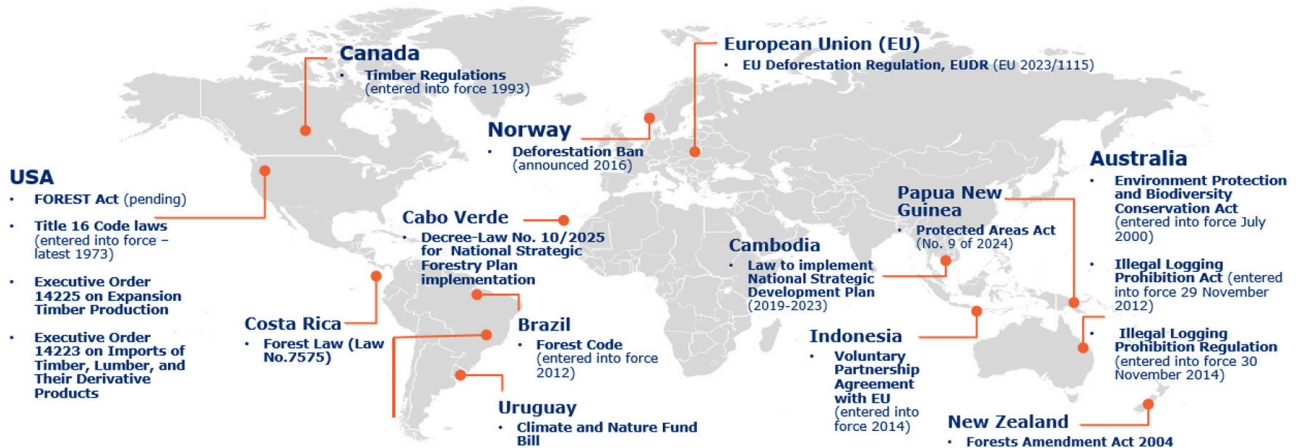
- 30 Dec 2025 for large and medium size enterprises
- Grace period: 6 months enforcement relief for large and medium size enterprises
- 30 Dec 2026 for micro and small enterprises

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).

- On 23 September 2025, the European Commission announced it will seek another 12-month delay for the application of the EU Deforestation Regulation (Regulation (EU) 2023/1115).
- This is the second major postponement since the law was adopted in June 2023.
- Current proposal: 30 December 2025 for large and medium size enterprises with a six-month enforcement grace period and 30 December 2026 for small and micro enterprises.
- The delay requires approval by the European Parliament and Council, which will also take time.
- The final list of finished products is still under review, pending the results of the EU consultation, which has closed and are not yet publicly available to date.





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

EC has decided to simplify the content of the EUDR by proposing an amendment to regulation available here : https://environment.ec.europa.eu/document/15e6d00c-28bc-48db-9b32-b485742d372b_en, the European Parliament and the Council will still need to approve these amendments by the end of November 2025.

Eventual changes that the amendment introduces are :

- Introduction of new definitions for Downstream operator and for Micro and Small primary operators
- Downstream Operators no longer obliged to submit Due Diligence statement
- Downstream operators or traders continue to ensure full traceability by collecting and passing on reference numbers of due diligence statements and declaration identifiers assigned to micro and small producer

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>

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