Thailand's EUDR Readiness Journey: *Market Insights and Practical Lessons*

Presented by
Dr. Ajaree Tavornmas
Access-Europe Co., Ltd.

ajareetavornmas@access-europe.eu
research@access-europe.eu

What is EUDR?

The EUDR, adopted in 2023, aims to reduce greenhouse gas emissions and biodiversity loss by **boosting the consumption of ‘deforestation-free’ products** and by **reducing the EU’s impact on global deforestation and forest degradation**.

“EU consumption represents around 10% of global deforestation.”
Deforestation is a major global driver of both biodiversity loss and climate change – arguably two of the most critical challenges facing our planet today.

The EUDR is designed to ensure that commodities consumed in the EU do not drive global forest degradation, mainly through **cattle, cocoa, soy, palm oil, coffee, rubber, and wood. Check Annex 1 of the EUDR Regulation if your project (HS) is covered.**

EUDR 3 Key Requirements

1. Geolocation
2. Legality
3. Due Diligence

Despite the delay implementation, the core requirement of the EUDR remains unchanged (for exporters and producers).

1

Sharing from Thailand: Key Lessons from Thailand's EUDR Readiness Journey

- Thailand values the EUDR and sees it as an important opportunity to access the EU market. Its commitment is shown through the establishment of the ***National Committee for EUDR***, which brings together key government bodies to help Thai products and traders—entrepreneurs, farmers, and operators—meet deforestation-free standards.

- For **Access-Europe Co., Ltd.**, this includes supporting two ARDA (Agricultural Research Development Agency, under the Ministry of Agriculture) projects and delivering in-depth research in Thai: **1) The EUDR Market Study in 2025, and 2) EUDR Monitoring and Analysis in 2026.**

- Under ARDA initiatives, Thailand has built the ***EUDR THAI Traceability Platform*** (a traceability system that functions as a single central database for deforestation and legality inputs) across all seven commodities, as well as a national **geolocation system**. This development was highlighted by the European Commission in its recent EUDR report.

Summary

Thailand's Progress and Mechanisms

- National Committee on Mitigating the Impact of the EUDR on Agricultural Commodities
- Compliance mechanisms: geolocation and traceability
- Raise awareness and understanding

1

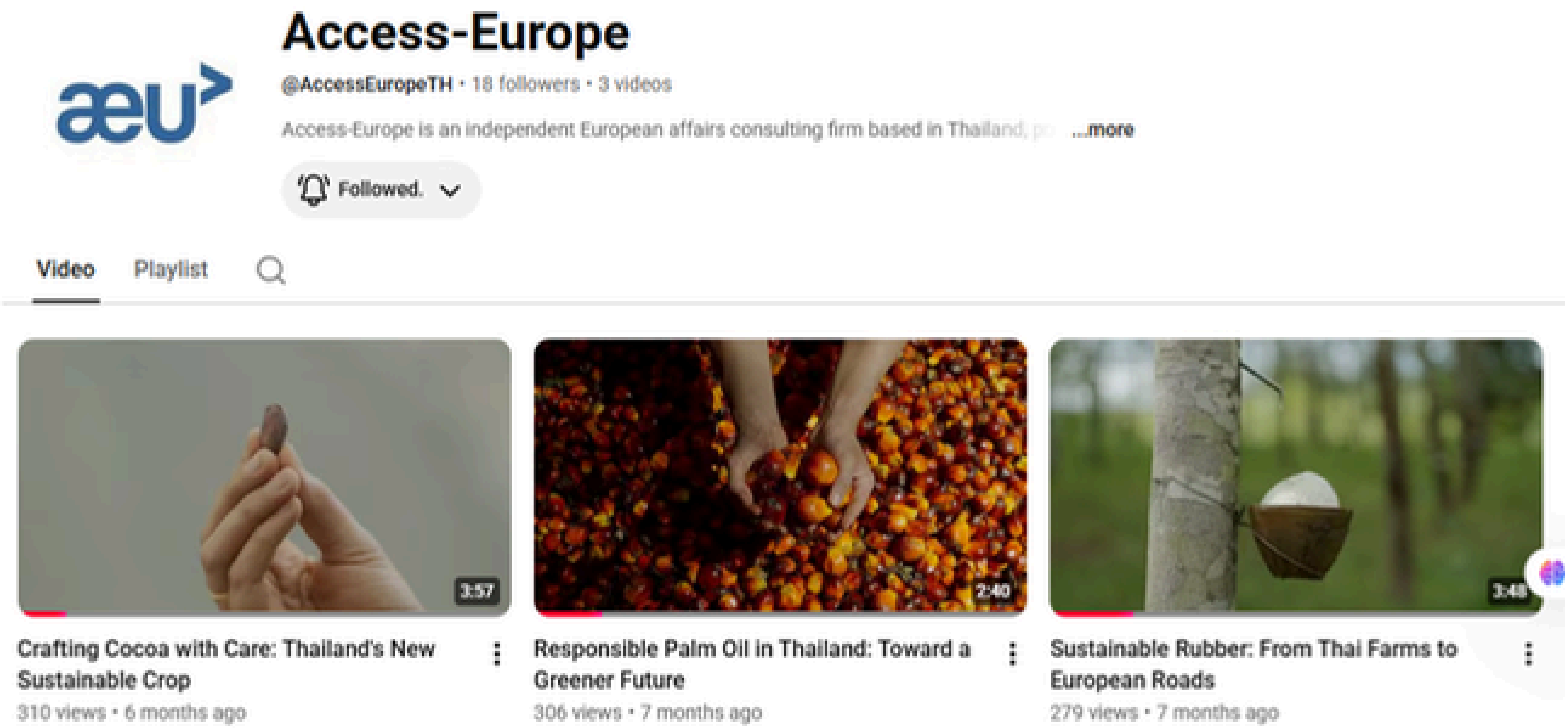
Acess-Europe Co., Ltd.

contributed to raising awareness and preparing Thai businesses for EUDR compliance!

- Hosting and organising **focus group meetings and seminars with Thai stakeholders** (e.g., businesses, traders, operators, government bodies) and **focus group meetings and direct meetings with EU stakeholders** (e.g., businesses, traders, operators, EU Commission);
- Publishing **articles** (in English) on Thailand's readiness for EUDR (available here)
- Promotional (short) **video clips** on Thailand's readiness for EUDR (available here)

Thailand's EUDR Readiness

March 2026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Crafting Cocoa with Care: Thailand's New Sustainable Crop
310 views • 6 months ago
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Sustainable Rubber: From Thai Farms to European Roads
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2

Market Insights & Analysis for EUDR Exporting Products from Thailand to the EU

THAILAND

Thailand's EUDR Market Insights & Analysis

Researched and analysed by
Access-Europe Co., Ltd.

EUDR Market Trends

Opportunities for Thailand & ASEAN = TRANSFORMATIVE CHANGES

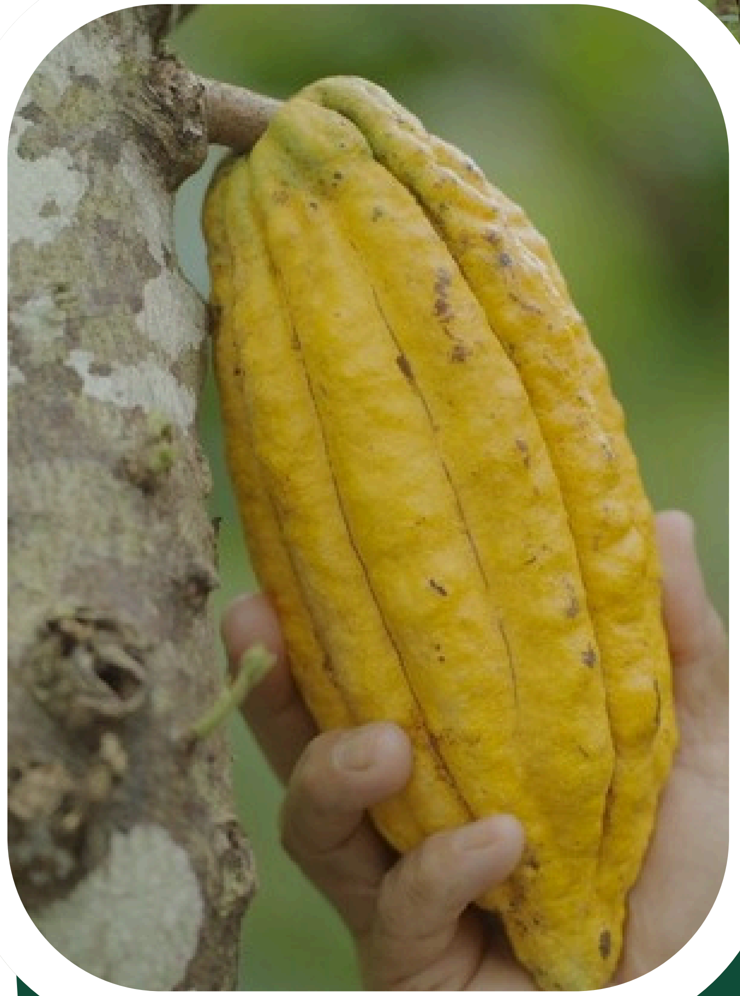
400 billion USD = 12.8 billion THB

EU Import

EU 38%

Global

- Compliance with the EUDR requires **transformative changes in sourcing practices**, promoting **transparency and traceability** in global supply chains.
- Successful adaptation to the EUDR can lead to economic rewards for producers, though **price structure is to be observed.**



EUDR products play a big role in Thailand's economy

$300,759.40 M
Thailand's exports

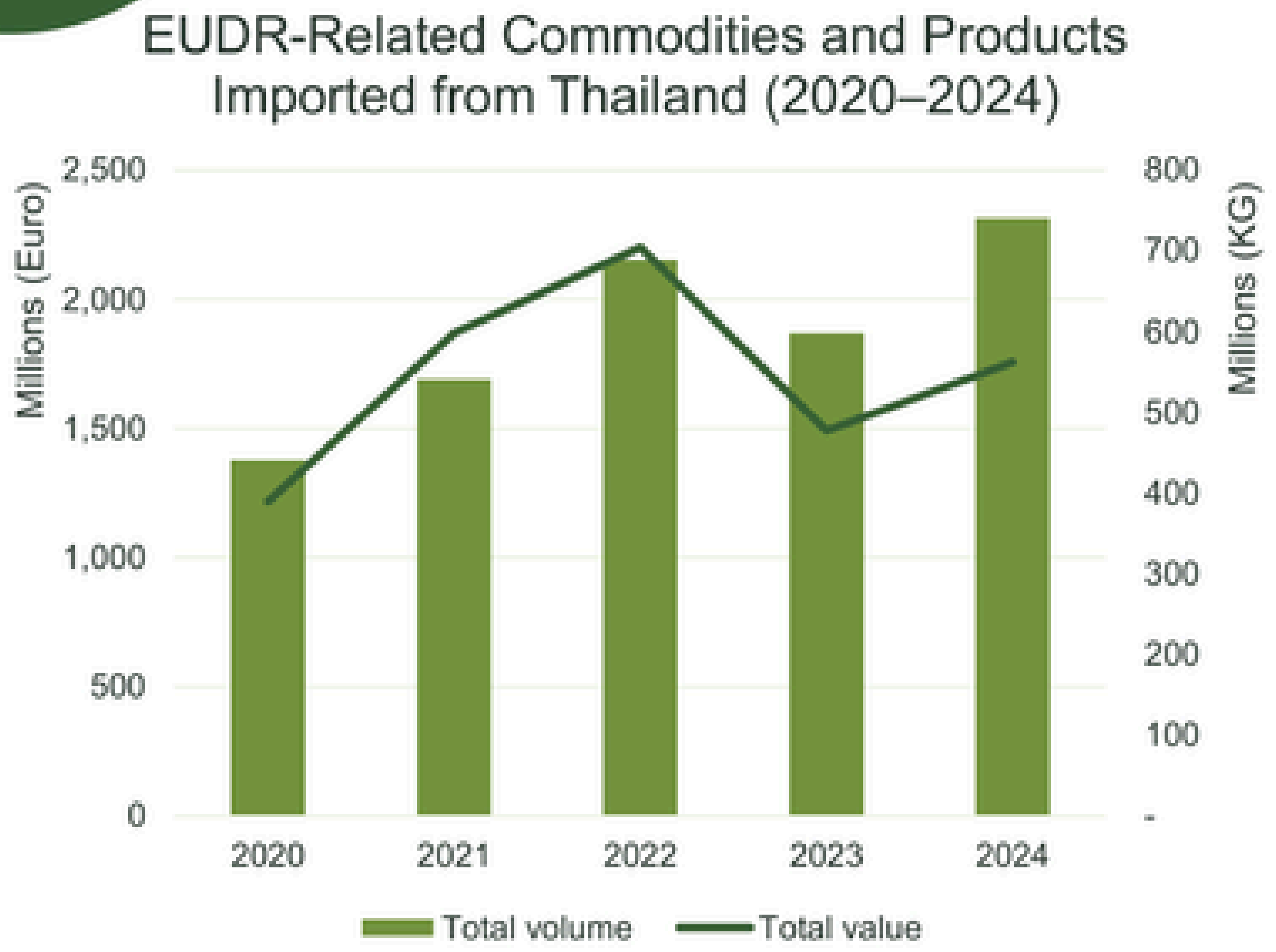
$24,234.86 M
Thailand's exports to the EU
Accounting for 8.05% of Thailand's total exports

$24,810.11 M
Thailand's EUDR-related exports
Accounting for 8.25% of Thailand's total exports

$1,853.18 M
Thailand's EUDR-related exports to the EU
Accounting for 0.62% of Thailand's total exports

Thailand's exports of EUDR-related products to the EU account for 7.47% of Thailand's total exports of EUDR-related products. Therefore, compliance with the EUDR is a crucial condition for maintaining competitiveness in the global supply chain.

EUDR-Related Commodities and Products The EU Imported from Thailand

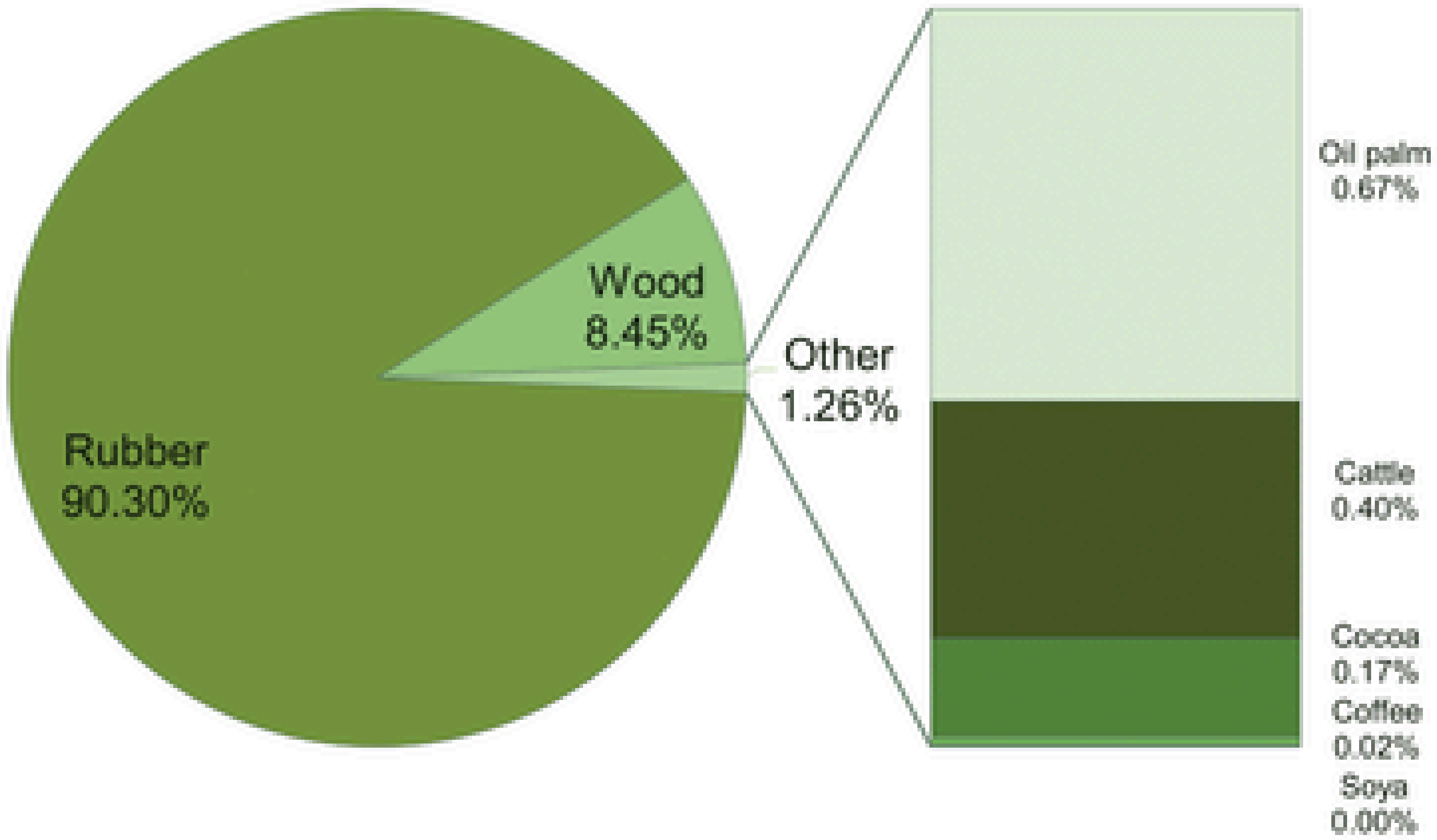


Source: Eurostat (accessed 23 June 2025) by CN code for EU imports and chart; UN Comtrade (accessed 12 July 2025) for comparative data

Note: Statistics on EUDR-related products derived from HS/CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

- In 2024, the EU imported €1.76 billion (Eurostat) or $2.03 billion (UN Comtrade) worth of EUDR-related commodities and products from Thailand.
- Although Thailand accounts for only 0.52% of the EU's total EUDR-related imports, its share in the EU's EUDR-related rubber imports is significantly higher at 2.69%.
- Thailand is also an enthusiastic participant in the global supply chain, as it exports EUDR-related commodities and products $24.81 billion to the world. 7.47% of those went directly into the EU.

Thailand's Exports of EUDR-Related Commodities and Products



	Export value to the EU (USD)	Share of Thailand's exports to the EU (%)	Share of Thailand's total exports (%)
Goods	24,234,861,097.94	100.00	8.06
EUDR-related	1,853,184,555.74	7.65	0.62
Rubber*	1,673,368,529.53	6.90	0.56
Wood*	156,522,945.80	0.65	0.052
Oil palm*	12,389,608.23	0.051	0.0041
Cattle*	7,502,374.47	0.031	0.0025
Cocoa	3,078,571.96	0.013	0.0010
Coffee	291,637.61	0.0012	0.00010
Soya	30,888.14	0.00013	0.000010

Source: UN Comtrade (accessed 12 July 2025) by HS code

Note: Statistics on EUDR-related products derived from HS codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3 Import Countries

14.26%

Germany

13.64%

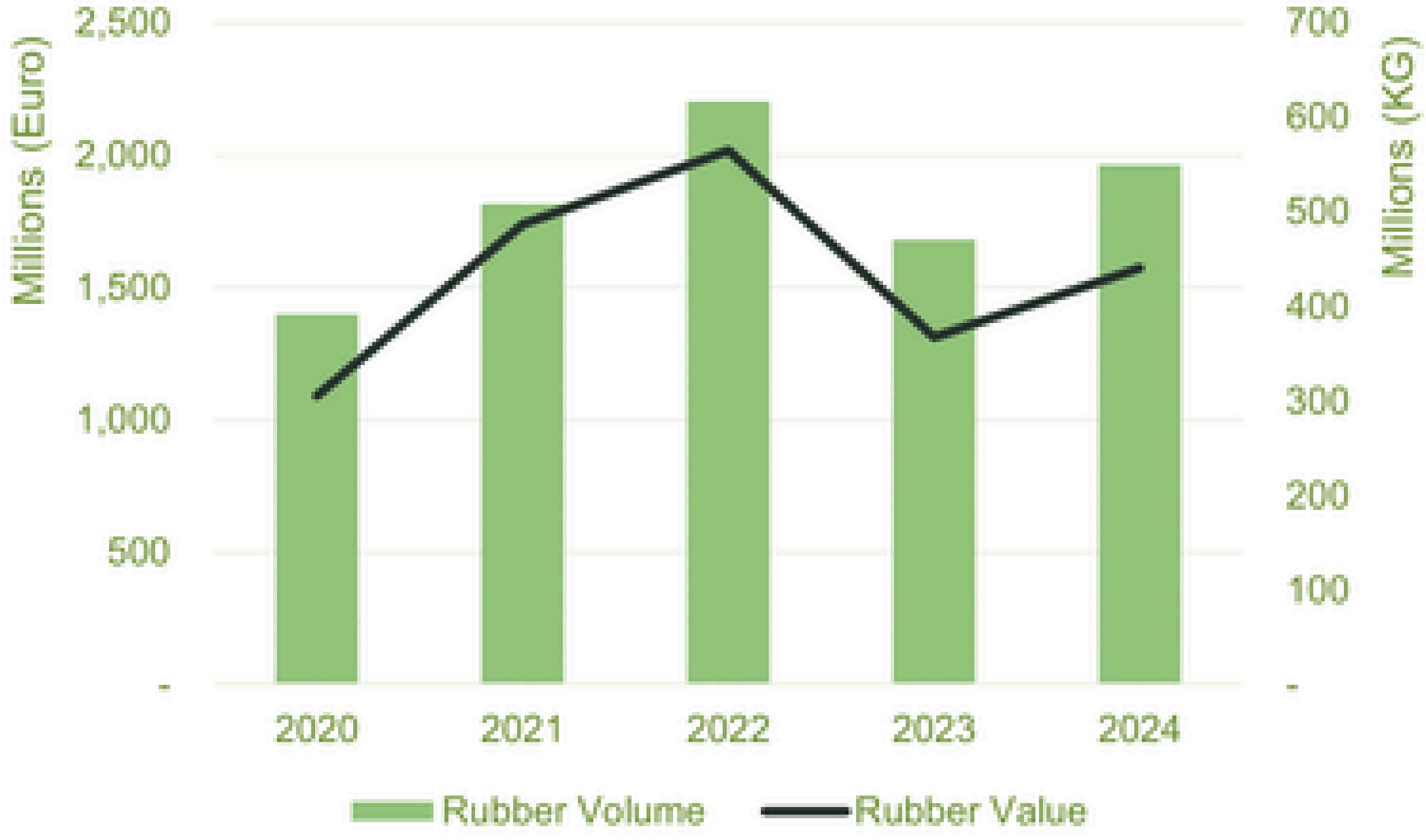
Spain

12.10%

France

EUDR Rubber

EUDR-related rubber products imported from Thailand (2020-2024)



Source: Eurostat (accessed 23 June 2025) by CN code

Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related rubber products from Thailand by CN code (Eurostat)

1. 4011 New pneumatic tyres
2. 4001 Natural rubber in primary forms
3. 4015 Vulcanised rubber apparel and accessories

Imported countries (Eurostat)

1. Germany – 14.70%
2. Spain – 14.54%
3. Netherlands – 12.02%

Potential of Thai Rubber under EUDR

Strength (S)

- *Thailand is one of the world's largest producers of natural rubber and has a strong processing industry.*
- *Rubber is a commodity with strong mechanisms to support compliance with EUDR requirements, and businesses in the sector are relatively well prepared.*

Weakness (W)

- *Farmers are shifting from rubber cultivation to other crops that offer better prices and are easier to manage and harvest, such as oil palm.*
- *Although Thailand is one of the world's largest rubber producers, it is not the EU's number one source of rubber imports.*

Opportunity (O)

- *EUDR-compliant rubber commands a higher price than rubber that does not comply with EUDR requirements.*
- *The EU has a high import value of rubber products from Thailand and strong demand for rubber products.*

Threat (T)

- *Competition with other producing and manufacturing countries, such as China, Côte d'Ivoire, Turkey, the United States, Malaysia, and Indonesia.*
- *Competition also comes from products linked to specific industries, such as tires related to the automotive and auto parts industries, where other countries are major exporters.*

EUDR Wood

Source: Eurostat (accessed 23 June 2025) by CN code
Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related wood products from Thailand by CN code (Eurostat)

1. 48 Paper
2. 9401 Wooden seats (excluding 9402), convertible or not
3. 4401 Fuel wood, wood chips, sawdust, and wood waste

Imported countries (Eurostat)

1. France – 23.91%
2. Belgium – 21.54%
3. Germany – 10.88%

Potential of Thai Wood under EUDR

Strength (S)

- *Forest protection laws are in force, along with measures to prevent the import of restricted timber from neighboring countries.*
- *Thailand also has timber products that are in demand, such as rubberwood, which is considered high-quality wood.*

Weakness (W)

- *The import of timber from abroad for processing, including timber imports from neighboring countries such as Myanmar.*
- *The collection and statistical system for Thailand's economic timber data remain limited, making analysis of timber products' market entry still incomplete.*

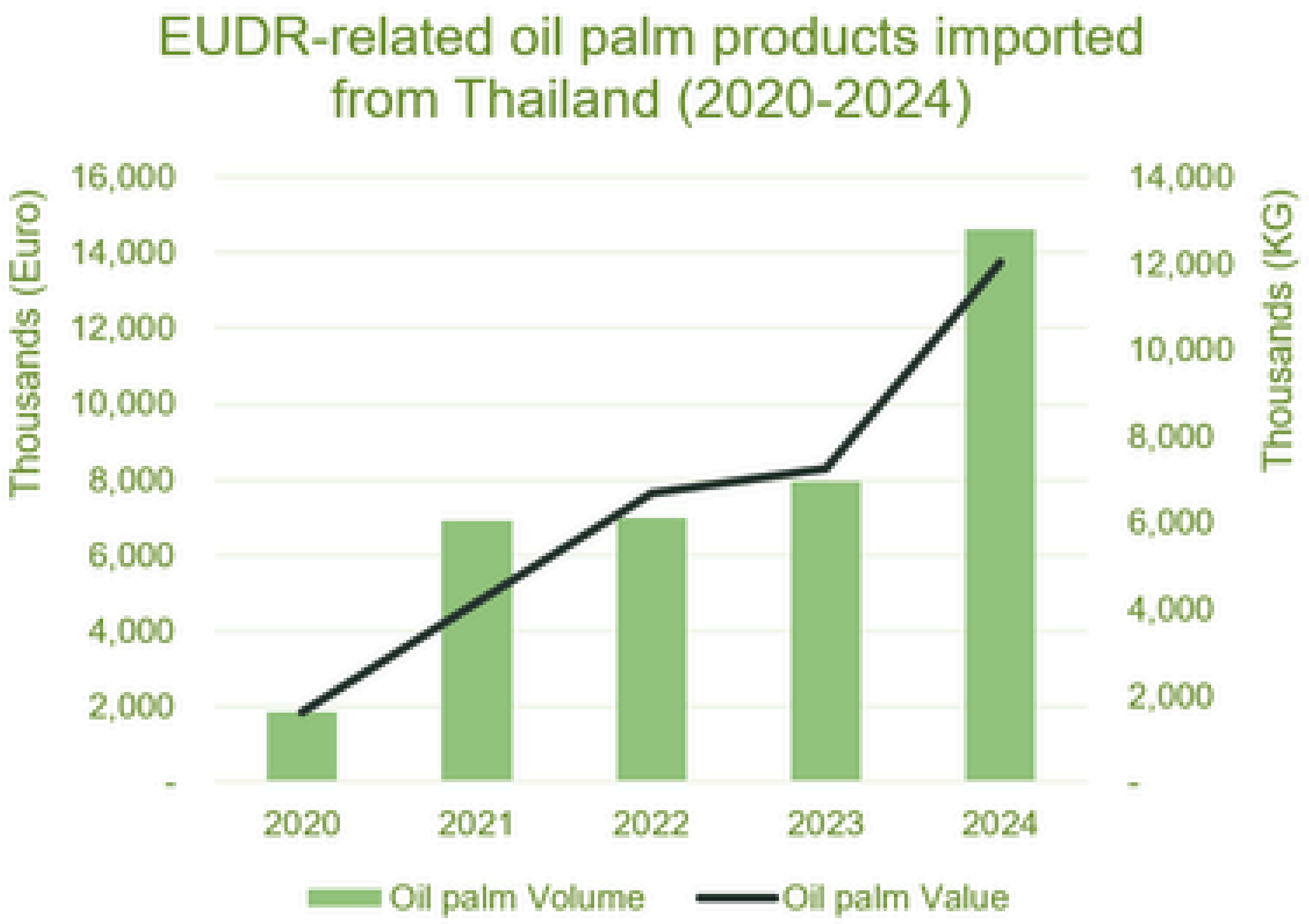
Opportunity(O)

- *The EU has demand for EUDR-related timber products worth more than USD 200 million per year.*
- *This presents opportunities for market access for timber products or sustainable wooden furniture, which are increasingly in demand.*

Threat (T)

- *Challenges in verifying and proving that agroforestry areas comply with the EUDR.*
- *Changing demand for timber products toward lower-value product categories, such as HS 4401 fuelwood.*

EUDR Oil Palm



Source: Eurostat (accessed 23 June 2025) by CN code

Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related oil palm products from Thailand by CN code (Eurostat)

1. 1511 Palm oil and fractions, unmodified
2. 3823 19 Industrial monocarboxylic fatty acids; acid oils, exclude stearic/oleic/tall oil
3. 1513 21 Crude palm kernel & babassu oil, unmodified

Imported countries (Eurostat)

1. Italy – 32.64%
2. Netherlands – 32.27%
3. Spain – 29.04%

Potential of Thai Palm Oil under EUDR

Strength (S)

- *Thailand is the world's third-largest producer of palm oil*
- *Farmers are increasing their palm oil cultivation.*

Weakness (W)

- *Palm oil production is insufficient to meet export demands.*
- *Exports of palm oil products to the EU have relatively concentrated destinations, such as monocarboxylic acids and other industrially used fatty acids rely almost entirely on the Dutch market.*

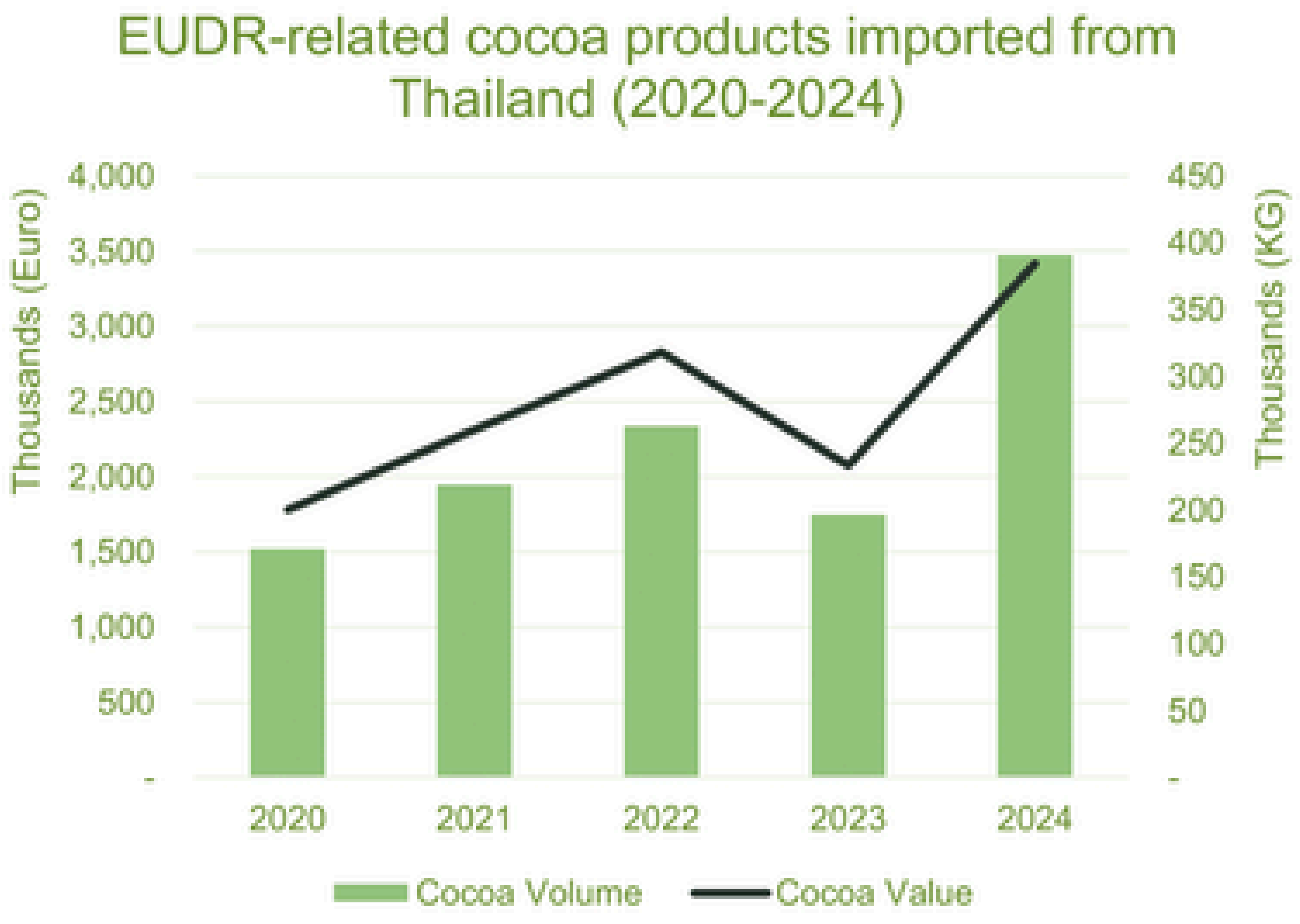
Opportunity (O)

- *Indonesia and Malaysia, the world's first- and second-largest oil palm producers, face challenges in terms of EUDR compliance readiness and deforestation risk.*
- *The EU's imports of EUDR-related palm oil products from Indonesia and Malaysia have declined, while imports from Thailand are showing an upward trend.*

Threat(T)

- *Competition with other types of vegetable oils that are widely used in the EU market, such as olive oil, sunflower seed oil, and canola oil.*
- *Other trade-related measures targeting palm oil, such as RED II.*

EUDR Cocoa



Source: Eurostat (accessed 23 June 2025) by CN code

Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related cocoa products from Thailand by CN code (Eurostat)

1. 1806 Chocolate & cocoa-based food products
2. 1801 Raw or roasted cocoa beans
3. 1805 Unsweetened cocoa powder

Imported countries (Eurostat)

1. Germany – 41.39%
2. Sweden – 33.91%
3. Belgium – 8.97%

Potential of Thai Cocoa under EUDR

Strength (S)

- *Exports of cocoa beans from Thailand to the European Union have continued to grow rapidly.*
- *Cocoa can be grown in all regions of Thailand, both as a monocrop and as an intercrop with other crops.*

Weakness (W)

- *Thailand still needs to upgrade its position as a global cocoa-growing source.*
- *Thailand's cocoa cultivation remains relatively limited, and it imports EUDR-related cocoa products for use in the supply chain to produce products under HS 1806.*

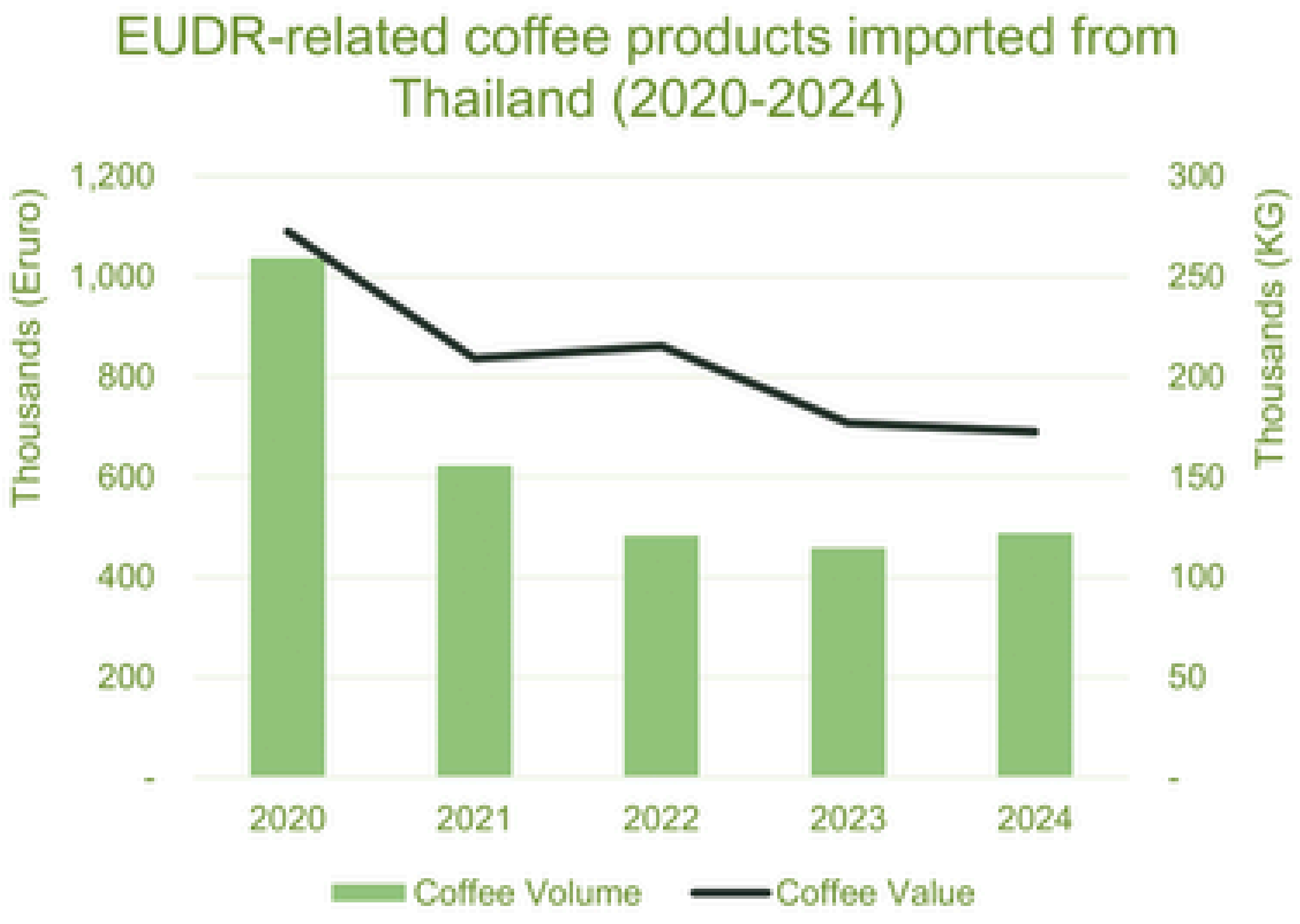
Opportunity (O)

- *The EUDR compliance readiness and deforestation-risk levels of non-EU source countries, particularly in Africa, create increased competitive opportunities for Thailand.*
- *The EU chocolate industry is well known and has demand for raw materials for production.*

Threat(T)

- *Competition with well-known cocoa-growing and cocoa-exporting countries.*
- *Cocoa bean prices have been quite volatile. After rising since late 2023, prices have shown a continuous downward trend since mid-2025, which has reduced farmers' long-term confidence.*

EUDR Coffee



Source: Eurostat (accessed 23 June 2025) by CN code

Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related coffee products from Thailand by CN code (Eurostat)

1. 0901 11 Coffee, not roasted, not decaffeinated
2. 0901 21 Coffee, roasted, not decaffeinated
3. 0901 90 Coffee, other (husks & skins, coffee substitutes with coffee content)

Imported countries (Eurostat)

1. Denmark – 28.71%
2. Netherlands – 21.97%
3. Germany – 19.19%

Potential of Thai Coffee under EUDR

Strength (S)

- *Thailand has coffee registered as geographical indications from 11 sources, and farmers are strongly committed to developing coffee varieties.*
- *Thailand's coffee industry is strong.*

Weakness (W)

- *Thailand still needs to upgrade its position as a global coffee-growing source.*
- *Thailand's coffee cultivation remains limited and is not sufficient for domestic consumption and export. As a result, imports of coffee under HS 0901 from other countries have increased.*

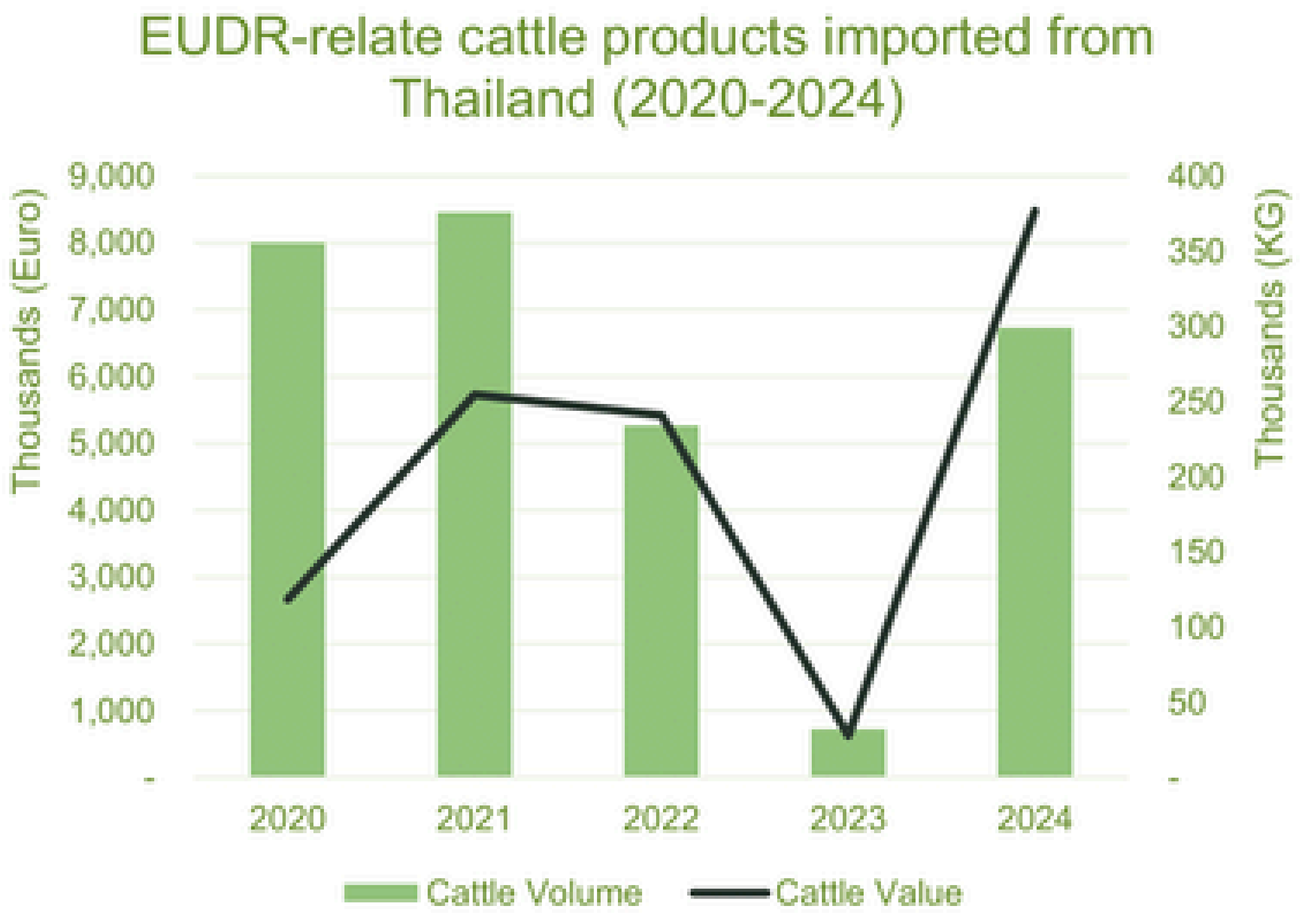
Opportunity(O)

- *The EU is the world's largest coffee-consuming market.*
- *Promoting distinctive coffees with unique characteristics and specific origins can help Thailand compete in the specialty coffee market.*

Threat (T)

- *Competition with well-known coffee-growing and coffee-exporting countries, especially neighboring ASEAN countries such as Vietnam, Indonesia, and Lao PDR.*
- *The European Union's imports of coffee from Thailand are showing a downward trend.*

EUDR Cattle



Source: Eurostat (accessed 23 June 2025) by CN code

Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related cattle products from Thailand by CN code (Eurostat)

1. 4107 Further prepared Leather
2. 4104 Tanned or crust hides and skins of bovine
3. 4101 Raw hides and skins of bovine

Imported countries (Eurostat)

1. Poland – 79.70%
2. Netherlands – 11.42%
3. Portugal – 3.84%

Potential of Thai Cattle under EUDR

Strength (S)

- *Processed cattle leather products exported to the EU mostly use hides imported from the United States and South American countries, which do not face major issues in terms of origin verification.*
- *Business operators are proactive in adapting their production processes to be more environmentally friendly, such as reducing greenhouse gas emissions and changing raw materials.*

Weakness (W)

- *Thailand is not a globally recognized cattle-raising source. Consumer products such as live cattle, beef, or offal are therefore not target products.*
- *Thailand's production of raw hides is limited, and the production process is not sufficiently conducive to domestic sourcing. As a result, the industry relies on imported hides from other countries for processing.*

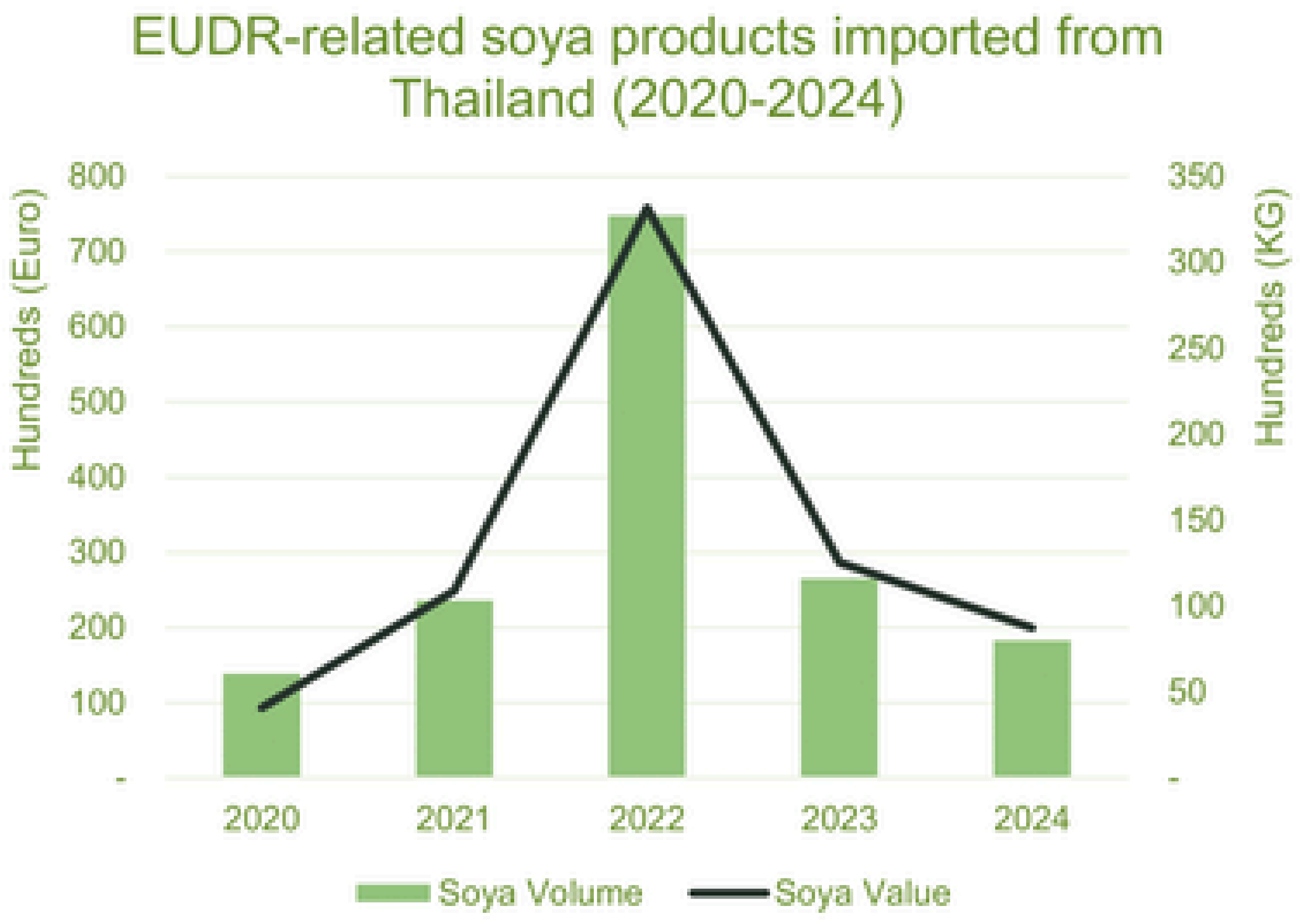
Opportunity(O)

- *The EU has a growing and well-known fashion and apparel industry.*
- *Tanned cattle leather is considered a low-risk product under the definition of the World Organisation for Animal Health. It also involves less complex export procedures and documentation than products intended for consumption, such as meat or offal.*

Threat (T)

- *A large number are available within the EU, as member states raise many cattle and have high-quality beef that is internationally well known.*
- *Thailand's geographical distance from the EU makes exports of EUDR-related cattle products relatively limited.*

EUDR Soya



Source: Eurostat (accessed 23 June 2025) by CN code
Note: Statistics on EUDR-related products derived from CN codes may include items that are not subject to EUDR in the case of products listed in Annex I that do not contain, or are not made of, a commodity listed in Annex I.

Top 3

Imported EUDR-related soya products from Thailand by CN code (Eurostat)

1. 1201 Soya beans, whole or not broken
2. 1208 10 Soya bean flour and meal
3. 1507 Soya-bean oil and its fractions, not chemically modified

Imported countries (Eurostat)

1. Sweden – 40.20%
2. Spain – 26.34%
3. France – 15.82%

Potential of Thai Soya under EUDR

Strength (S)

- *Thailand is one of the major producers of soybean oil and has a strong industry.*

Weakness (W)

- *Thailand produces very small quantities of soybeans. The production of soybean-based industrial products, such as soybean oil, therefore relies on imported raw materials from other countries.*

Opportunity(O)

- *The European Union is the world's second-largest importer of soybean oil.*

Threat(T)

- *Competition with other types of vegetable oils that are widely used in the European Union market, such as olive oil, sunflower seed oil, and canola oil.*

3 Summary of EU & Non-EU Buyer Expectations, Due Diligence, and Traceability

- Complete, precise, and clear documentation (such as Due Diligence – DDS or a Simplified Declaration – SD) to prove that your products are deforestation-free.

Note: Non-EU buyers often ask for extra documents, although they are not needed. Businesses can still prepare these documents to maintain trust with their trading partners.

- Ensure that your products are traceable throughout the supply chains.

3

Practical Lessons for Indonesian Businesses on Data Readiness, Supplier Mapping, and Smallholder Inclusion

- **Data Readiness:** Businesses are encouraged to prepare and start collecting data before releasing each shipment (the earlier, the better!).

According to the EUDR FAQ (version 5, April 2026), page 36:
“Downstream operators and traders are required to collect and keep the information described in point a) for **at least five years** from the date of placing or making available on the market or export.”

- **Supply chain mapping:** Using tools can help businesses check and confirm that their supply chain is free from deforestation.

EUDR MUST KNOW !

- Deforestation-free status: The cut-off date is December 31, 2020
- Traceability to plots (GEOJson Standard Format)
- Legality proof (at farm level), including labour issues
- Risk assessment
- Risk mitigation
- Official submissions via the EU TRACES system (by the operator +1)

Get Ready & Keep Monitoring!

Continuously verify new batches, monitor changes (e.g., risk benchmarks), prepare for audits, and update via digital tools for efficiency.

EUDR TIMELINE 2026

The clock may have shifted – the responsibility has not. 2026 is not a “wait-and-see” period. It’s a strategic preparation window to build reliable systems, close data gaps, and ensure compliance without last-minute pressure.

30 DECEMBER 2026

Large and medium-sized companies: EUDR applies from 30 December 2026

30 JUNE 2027

Micro and small companies: EUDR applies from 30 June 2027

4

Compliance Burden or Strategic Positioning?

How to use EUDR Readiness to Strengthen Trust, Competitiveness, and EU Market Access

5 *Key Takeaways for Indonesian Businesses Preparing for EUDR Implementation by December 2026*

- Start tracing your products and supply chains
- Prepare documents, notably DDS
- Trust trading partners

EUDR COMPLIANCE STEPS

What you need to know!

1. **Preparation Steps**

- Confirm your role as an operator (first EU market placer or exporter) or trader, and identify in-scope products using HS codes in Annex I.
- Map supply chains, noting suppliers, countries, and any low-risk designations for simplified checks.

2. **Data Collection**

- Gather geolocation (GPS/polygons) of production plots, production dates after 2020, product details (HS code, quantity), supplier/buyer info, legality evidence (permits, rights compliance), and deforestation-free proof (imagery, history).

3. **Risk Assessment**

- Evaluate risks at country, supply chain, plot/supplier, and documentation levels per Article 10, using trends in deforestation, governance, and supplier history.

4. **Risk Mitigation**

- If non-negligible risks exist, request more evidence, conduct audits, engage suppliers for improvements, or switch sources until risks drop to negligible per Article 11.

5. **DDS Submission**

- Submit a Due Diligence Statement (DDS) per shipment via EU TRACES, including annual quantity estimates and unique reference; retain records for 5 years.

6. **Ongoing Monitoring**

- Continuously verify new batches, monitor changes (e.g., risk benchmarks), prepare for audits.

DUE DILIGENCE

What you need to know!

Due diligence obligations, mentioned in Article 3 of Regulation (EU) 2023/1115, require that relevant commodities and products **shall not be placed or made available on the Union market or exported**, unless all the following conditions are fulfilled:

- Deforestation-free.
- Produced in accordance with the relevant legislation of the country of production.
- Covered by a Due Diligence Statement (DDS).

In other words, due diligence involves demonstrating that products are not linked to deforestation or forest degradation and are produced legally. This includes conducting risk assessments and ensuring traceability.

WE NEED TO KNOW/HAVE: DATA that shows

- Traceability information (where the product came from).
- Risk assessment to identify any potential deforestation risks.
- Mitigation measures to address identified risks.

What you need to know!

EUDR INFORMATION SYSTEM

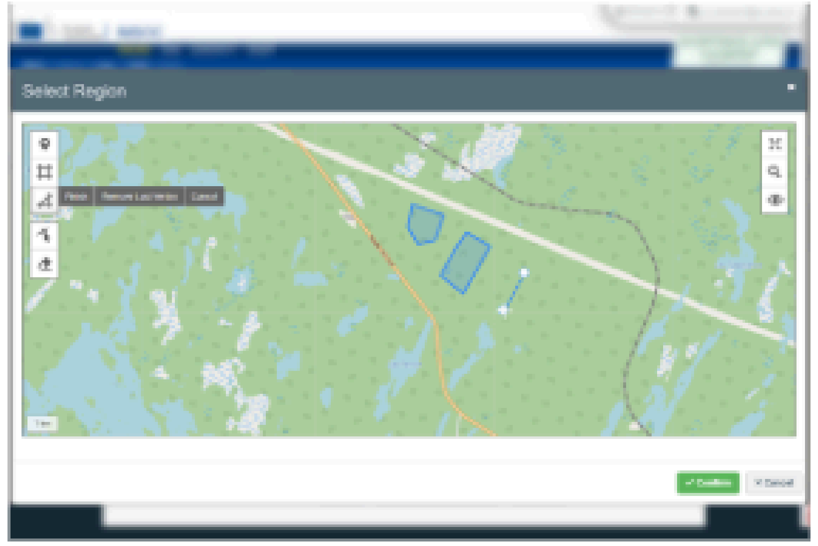
The EUDR Information System

Any operator or trader or their representatives may use the publicly available online version of the Information System. You can use this website to declare that due diligence has been performed before the import, export, domestic production or merchandising of products that are in scope of the EU Deforestation Regulation.

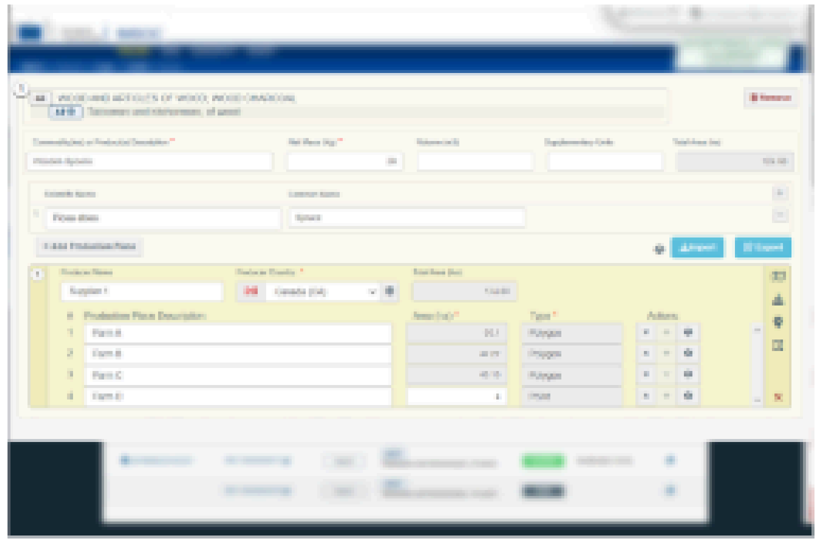
Indicate the origin of the materials

Operators can indicate the exact origins of products and materials by drawing areas on a map, or by providing coordinates individually or in bulk. To make the process as simple as possible for companies working with products from multiple locations, there are options for uploading, copying or re-using location information.

Coordinates can be provided in bulk in a file using the GeoJSON standard format. This file description also includes solutions to the most common technical issues related to the creation of GeoJSON files.



Select one or more points or areas using the map



Indicate the characteristics of the product: type, weight, volume

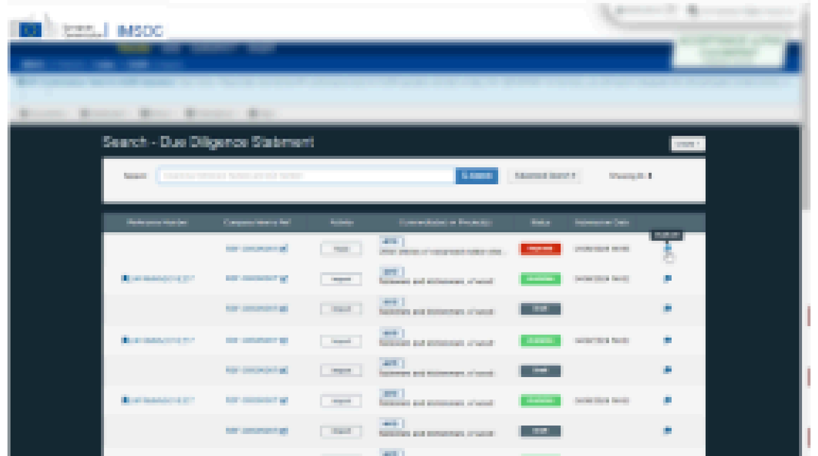
Provide details of the products

To create the Due Diligence Statement, the operator selects the type of product and indicates characteristics such as HS code, product description, and quantity.

Operators further down the supply chain and traders within the EU) can refer back to Statements created previously by adding the reference numbers and verification numbers either manually or as a CSV file.

Use the dashboard to view and manage Due Diligence Statements

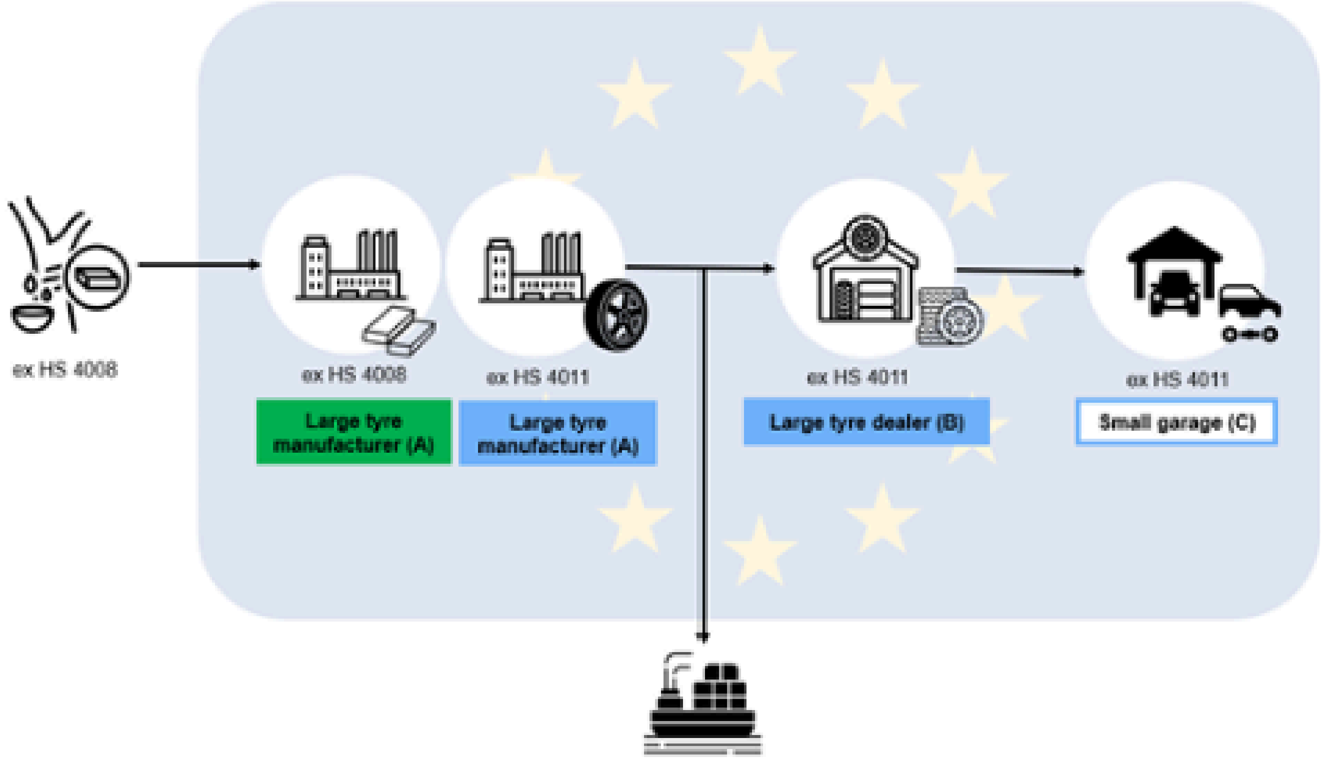
Operators can view and manage their Due Diligence Statements in a dashboard. The status of the statement will be updated as it is processed by the system.



Case Study

2. EU-based operations with commodities produced outside the EU

Scenario 5: Supply chain for rubber



Although this supply chain depicts rubber, all scenarios are illustrative and the rules depicted generally apply to other relevant products.

Large tyre manufacturer A buys natural vulcanised rubber (ex HS 4008) from a third country and imports it into the EU. Tyre manufacturer A is an ***upstream operator*** when declaring the import under customs procedure 'release for free circulation', because it is placing a relevant product listed in Annex I of the EUDR on the Union market for the first time (***Text Box 1***). Tyre manufacturer A must exercise due diligence for the vulcanised rubber (ex HS 4008) (***Text Boxes 2 and 6***). It is responsible for compliance of the relevant products with Article 3, including ensuring that the products are deforestation-free and legal. It must also submit a DDS in the Information System prior to import and include the DDS reference number in the customs declaration.

If tyre manufacturer A imports multiple shipments of vulcanised rubber (ex HS 4008) from the same country/region, these could be covered by a single DDS valid for up to one year, so long as due diligence has been carried out for all relevant products intended to be placed on the market prior to submission of the DDS and all geolocations have been declared (***Text Box 3***).

EUDR Supply Chain Infographics (3rd Edition)

Supply chain actors beyond this point do not need to exercise due diligence or submit due diligence statements. They are not responsible for compliance of relevant products with Article 3 *(Text Box 4)*.

Large tyre manufacturer A uses the vulcanised rubber that it imported to produce new tyres (ex HS 4011), a new relevant product listed in Annex I of the EUDR. Some of these tyres are placed on the Union market and some are exported from the EU. Given that the new tyres are made entirely from the vulcanised rubber (ex HS 4008) that was already subject to due diligence and covered by a DDS prior to its import, tyre manufacturer A therefore meets the definition of ***downstream operator*** in respect of the tyres both for their placing on the market and for their export (***Glossary, Text Box 1***).

Because tyre manufacturer A has already fulfilled their obligations as an upstream operator (for vulcanised rubber ex HS 4008) they do not have any additional obligations when placing the tyres (ex HS 4011) on the market. However, as tyre manufacturer A was an upstream operator for the vulcanised rubber, it must communicate the DDS reference numbers to the first downstream operator or trader in the supply chain for their relevant products (Art. 4(7) and Art. 5(3)(a)), for example to large tyre dealer B.

Some of the new tyres (ex HS 4011) are sold to **large tyre dealer B**. Tyre dealer B makes the new tyres available on the Union market, and the HS code does not change. Tyre dealer B is therefore a **trader** (***Text Box 4***). Obligations for traders are the same as for downstream operators. Given that its direct supplier was an upstream operator (tyre manufacturer A, when importing the vulcanised rubber), tyre dealer B, as the ***first trader***, is required to collect and keep DDS reference numbers from that supplier. It is also subject to the general obligations of downstream operators and traders, including record keeping. As a non-SME, it is also required to register in the Information System.

Tyre dealer B sells the tyres to **small garage C**, which sells tyres to customers. Garage C makes the new tyres available on the Union market and is therefore a ***trader***. Garage C is subject to the general obligations of downstream operators and traders, including record keeping (***Text Box 4***).

COUNTRY BENCHMARKING

What you need to know!

- The benchmarking system classifies countries according to the level of risk of producing commodities covered by the scope of EUDR that are not deforestation-free.

- The benchmarking will facilitate operators' due diligence processes and enable competent authorities to effectively monitor and enforce compliance. Additionally, it will incentivise countries to improve the sustainability of their agricultural production systems and minimise their deforestation impact.

- **The risk classification defines the extent of compliance checks that Member States' competent authorities foresee among operators sourcing from different countries (1% for 'low risk', 3% for 'standard risk' and 9% for 'high risk').**

- Sourcing from low-risk countries entails simplified due diligence obligations for operators and traders. This means that they need to collect information for due diligence purposes, but not assess and mitigate risks.

- The benchmarking process will be dynamic, with a first review scheduled for 2026. **This review is intended to take account of the updated FAO FRA data, expected to be published in October 2025.**

EUDR PAIN POINTS

What you need to know!

- Poor data quality in shipment data (invalid polygons, overlaps, missing DDR)
- Fragmented data storage (multiple sources)
- Lack of automation
- Inconsistent data system (will weaken traceability → less transparency → more risk)

WRAP UP

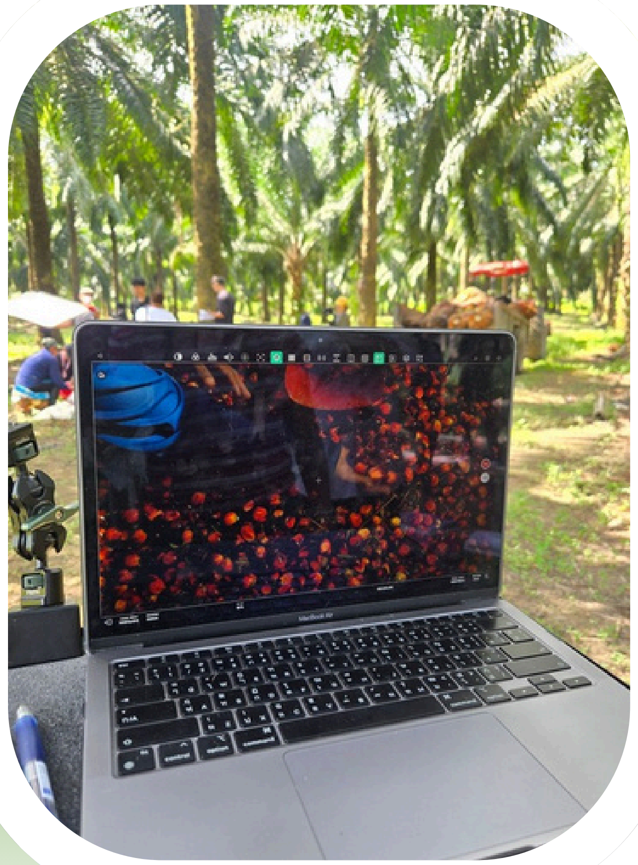
YOUR THOUGHTS ?

Q&A Session

Website
www.access-europe.eu

Thank You

For Your Attention



Phone
+66 86 815 8821

Email
research@access-europe.eu

Website
www.access-europe.eu

LinkedIn
Access-Europe