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The European Union Deforestation Regulation framework

National Pathways to EUDR Compliance

VERNEY, ALAIN | ONF International

Regional Workshop on Wood Tracking Systems (WTS) and EU Deforestation Regulation (EUDR) Compliance:
Strengthening Forest Governance in Eastern Partnership countries

Yerevan, Armenia, 23-24 October 2025

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Structure of the presentation

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EUDR – Opportunities and risks

Opportunities

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Improved market access: Continued, secure access to the EU market.

Competitive advantage: Positioning of early adopters as trusted, sustainable suppliers.

Sector modernization: Introduction of traceability, digital monitoring and transparency systems.

Regulatory alignment: Supports harmonization with EU forest governance and environmental standards.

Capacity building & funding: Opens access to EU technical assistance and green financing.

Environmental & social co-benefits: Reduced deforestation, stronger community involvement, and contribution to national climate goals.

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EUDR – Opportunities and risks

Challenges and potential risks



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Compliance costs: Significant investment in traceability, verification, and data management systems.

Institutional readiness: Coordination gaps between forestry, environment, customs and trade authorities.

Smallholder exclusion: Risk small forest owners and informal operators left out of EU market.

Digital tools/platforms can be complex to use, requiring advanced skills.

Transition timeline: Limited time to adapt system before enforcement.

EU Country benchmarking: Potential reputational impacts if countries poorly rated.

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Challenges for players in the supply chain

*Provision of information
evidence by forest producers*

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Challenges for players in the supply chain

To fulfil their DD obligations, EU established operators will require the following information from producers:

Product: species, harvesting dates/periods, shipping documents/lists

Deforestation/Forest degradation: Geolocation of forest plots

No exception, GeoJSON format coordinates to be uploaded in EU information system

Legality of production and trade: Administrative authorizations, Specific reports on environmental and social aspects, payment of taxes and duties, Certification documents...

No predefined list, depends on national laws and particular requests from operators in the EU

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Challenges for players in the supply chain

*Due Diligence downstream
of the non-EU supply chain*

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Non-EU operators/traders are not required by EUDR to implement a DDS, but they should be able to assure their EU customers their products comply with the regulation.

Consequently, to secure their business with the EU, they must at least:

- **Map their own supply chain**
- **Assess the risks of:**
 - Deforestation/forest degradation and illegal production
 - Mixing non-compliant products or otherwise circumventing the EUDR

Operators must also take into account any substantiated concerns that come to their attention.

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Challenges for players in the supply chain

Information management



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Producers and intermediaries need to set up a **system for collecting, storing, and transmitting information downstream in the supply chain**, including to their EU customers, such as:

- Geolocation data for forest plots
- Relevant information for DD

In addition, it would be prudent for them to obtain **formal agreement from their suppliers to communicate this information downstream** in the supply chain and, possibly, to be audited by a second or third party against EUDR requirements.

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Challenges for players in the supply chain

Practical solutions and support needs

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Certification:

- International Forest and Chain of Custody certification (FSC, PEFC)
- Verification schemes (SGS, Preferred by Nature)

Digital traceability platforms integrating geolocation and legality data.

- Satellite imagery and GIS (Open Foris, Google Earth, QGIS, ...)
- Supply Chain mapping and integrity solutions (Integrity Next, Source map, FSC Trace, ...)
- Specialized EUDR software solutions (Supply Logica, Ecosource, ...)

Capacity building (possibly funded by EU Operators):

- Training
- Technical support
- Shared technological solutions

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Challenges and support at the institutional level

Maintain “low risk” rating in EU country benchmarking

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- Current methodology based primarily on observed deforestation rates, not on legality factors
- Classification published in May 2025 contested and likely to be reviewed.
- The 4 countries are close to thresholds set by FSC and PEFC certification systems.

PEFC Low risk if score ≥ 50 →

PEFC Low risk if score $\geq 0,50$ →

	Corruption Perceptions Index (CPI)		World Justice Project (WJP)	
	Score (/100)	Rank (of 180)	Score (/1,00)	Rank (of 142)
Georgia	53	53	0,60	49
Armenia	47	63	-	-
Republic of Moldova	43	76	0,54	64
Ukraine	35	105	0,49	88

Potential areas for improvement

- Adapt regulatory, institutional, and technical frameworks
- Strengthen law enforcement and forest governance transparency.
- Ensure coordination among forestry, trade and environment authorities

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Challenges and support at institutional level

Institutional support to the private sector

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Availability and authentication of information: Ensure remote public access to legal and geospatial data (permits, maps, harvesting rights) to facilitate exercise of DD by EU operators

Capacity building for private actors: Awareness raising and training on EUDR requirements

Facilitation of certification: Develop or align national legality verification or sustainability standards.

Digital documentation systems: Integrate traceability and legality data into interconnected digital platforms (transport, trade, customs, ...)

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Challenges and support at institutional level

Building Institutional and technical capacity



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Training: Customs, forestry and trade officers trained on EUDR requirements

Digital tools & platforms: Develop monitoring and traceability systems linking forest, customs and trade data.

Verification systems: Strengthen administrative and field inspections to verify/acknowledge legality of forest operations

Inter-agency coordination: Enhance collaboration between forestry, customs, trade, and environmental authorities.

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Challenges and support at institutional level

Cooperation and dialogue with the EU

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Cooperation and dialogue with the EU would foster:

- **Technical & financial support to EUDR implementation:**
 - Team Europe Initiative on Deforestation-Free Value Chains (SAFE, Technical Facility)
 - Forest Partnerships (FGVC, EFSD+)
 - FLEGT–VPA processes
- **Lobbying to maintain “low-risk”** rating in EU country benchmarking
- **Contributing to preparations for possible EU integration:**
 - Alignment with EU Green Deal and Single Market environmental standards.
 - Strengthening credibility and visibility of reforms in candidate and associated countries.

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Thank you for your attention!



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