

# EUDR Reboot

## New Commission's Proposal Redefines Compliance Path

29 October 2025

On 21 October 2025, the European Commission published a proposal to amend the EU Deforestation Regulation (EUDR). The proposal came as a surprise, particularly in light of speculation that the Commission would seek to suspend the applicability of the EUDR for an additional 12 months. In a letter dated 23 September 2025 from the EU Environment Commissioner Roswall, it was ventilated the idea of postponing the implementation of the EUDR, citing technical challenges with the electronic system responsible for issuing the Due Diligence Statements (DDS) – a precondition for placing in-scope products on the EU market. The Commission acknowledged that the system may not be fully operational by the current deadline of 30 December and noted that it cannot guarantee the platform will be able to handle the expected volume. Instead of moving forward with this first approach, the Commission proposed further amendments to the text while introducing a six-month grace period during which companies would not be subject to checks or potential penalties. The proposal will most likely go to a first vote in the European Parliament either on 12-13 November or during the session of 24-27 November. The final vote, following the conclusion of the trilogue negotiations, is expected to take place during the plenary session of 15-18 December, just days before the EUDR is scheduled to begin applying on 30 December, making it a very tight timeline.

### Simplification of Obligations

A key feature of the Commission's proposal is the streamlining of due diligence obligations across the supply chain. Under the current EUDR, every operator placing or making relevant products available on the EU market must submit a due diligence statement. The traders are also responsible for making sure the DDS was conducted and that the due diligence prior to it was effective. This has raised concerns about duplication and system overload.

To address this, the proposal introduces **two new legal categories**:

- **Downstream operators** – These are companies that manufacture, process or sell products made from EUDR-relevant commodities that already carry a due diligence statement or simplified declaration.

These operators will no longer be required to submit separate due diligence statements. Instead, they must collect and transmit reference numbers or declaration identifiers throughout the supply chain.

- **Micro and small primary operators** – This new subcategory includes natural persons, and micro or small enterprises established in low-risk countries, who produce and place their own goods on the market (e.g. smallholders or foresters).

These operators are exempt from regular due diligence obligations. Instead, they will only need to make a one-time simplified declaration in the EU information system, with no action required if equivalent data already exist in national databases. This declaration will generate a unique declaration identifier, which will accompany the products along the supply chain.

Non-SME downstream operators and traders will still be required to register in the EUDR information system, and competent authorities will retain access to all relevant data for monitoring and enforcement purposes.

The amendment also aims to reinforce the **risk-based approach** for checks.

Competent authorities would continue to plan annual inspections based on risk profiles generated through the EU information system, which cross-references data on operators, commodities and countries of origin. The minimum annual inspection rates – 9% for high-risk, 3% for standard-risk and 1% for low-risk products – remain unchanged in the proposal.

### Adjustment of Implementation Dates

The proposal also intends to modify the entry-into-application schedule of the EUDR.

- Large and medium-sized companies must comply from 30 December 2025, as originally planned, but will benefit from a **six-month grace period** for checks and enforcement.
- Micro and small operators will have an **extended deadline** until **30 December 2026**.
- Competent authorities' enforcement duties will apply **from 30 June 2026**, and **from 30 December 2026** in respect of micro and small operators.

The original EUDR text established two key review obligations for the Commission, both of which are already delayed: one by 30 June 2024 to assess the possible inclusion of other wooded land, and another by 30 June 2025 to evaluate the extension of the Regulation to other natural ecosystems and additional commodities. In line with these new implementation dates, the proposal also aligns the Regulation's review and reporting obligations. The next general review of the EUDR is postponed to 30 June 2030.

## Next steps

The proposal will now be examined by the European Parliament and the Council under the ordinary legislative procedure. The Commission urges co-legislators to adopt the amendment before the end of 2025 to allow for a seamless transition and legal certainty ahead of the 2026 implementation phase.

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BLOMSTEIN will closely monitor further developments and keep you informed. If you have any questions about the EUDR, [Florian Wolf](#), [Bruno Galvão](#) and the entire team is ready to assist you.

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