

BIC EUDR Practicalities Report 5

Project update: November 2025

Current project status:

7/7 weeks completed,

2/2 weeks to refine the deliverables before publication

Summary of current position:

- The Task and Finishing Working Group (T&FWG), met twice during October to discuss the latest position on EUDR. They agreed the following points:
 - To continue meeting monthly or more regularly if needs be,
 - One team member and the project consultant continue to work with the Irish Booksellers,
 - The T&FWG have had long discussions around the 'transition period' and will it be possible to sell books currently with UK distributors and warehouses into the EU after the 30 December 2025. The transition period is from the 29 June 2023 to 30 December 2025. For the book supply chain, this means organisations must prove that books produced during that period are in accordance with EUTR and therefore can be covered by EUDR. This is a very contentious point and people's understanding varies greatly in this area. A small sub-working group created an update for organisations on how they can assess products that fall into the transition period. This update is with the BIC Executive Director for approval
- Towards the end of September Jessica Roswall, a member of the EU Commission requested a delay to the implementation to EUDR on the grounds that EU Traces was not up to the task.
<https://www.euractiv.com/content/uploads/sites/2/2025/09/EUDR.pdf>
- This proposal was rejected by the EU Commission, but they have come up with a new proposal that aims to reduce the burden on supply chains and the number of organisations that need to access EU Trace.
- [Commission proposes targeted measures to ensure the timely implementation of EU Deforestation Regulation](#)
- The trouble is that this simplification has removed the ability to 'nest' paper DDSs when creating a book DDS. This will mean that source geolocation data will have to be passed down the entire supply chain, and the EU Importer of Record will be the only organisation creating a DDS for the product. This does not work for publishing and several other industries. A lot of concerns about the new proposal are being talked about in the press. Such as EU ambassadors' rebel against Commission's deforestation plans | Euractiv
<https://share.google/k6uZESHqj2vsglGT9>
- The new proposal still must receive approval from the EU Parliament, EU Council, and EU Commission. Again, this process will take time and with 45 days to go before 'go-live' we might not have an answer until just before Christmas like last year.

Initial Deliverables Achieved to Date:

- The EUDR Practicalities - A Fast Track report has been approved and published,
- The EUDR Helpful Information has been approved and published,
- The four data flow maps have been approved and published,

Next steps:

- The T&FWG are meeting again in November to discuss all the latest developments.
- Complete the FAQs, although this is a working document.

Simon Crump, Environmental Consultant for BIC, 1st November 2025