

# BIC EUDR Practicalities Report 13

**Project update: May 2026**

**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) small review team met twice and the full team once during May to discuss the latest position on EUDR. The main points of discussion being

- To review the simplification documentation the EU Commission published on the 4 May 2026,
- To understand what this would mean for the book publishing industry. The main points being:
  - Chapter 49 - printed matter is now out of the regulation - for us that is books, scientific journals and some calendars
  - Chapter 48 - writing journals, notebooks and diaries are still in the regulation
  - There is new terminology of a first operator who creates the DDS when placing goods on the market
  - The first operator has to conduct due diligence on its supply chain
  - The first operator then passed information about the DDS to then organisation in the supply chain the downstream operator
  - The downstream operator must hold that information for five years and is not obligated to share it down the supply chain
  - There is new terminology of a non-EU operator who creates a DDS if they are placing goods on the EU market. The first EU operator to receive the goods also must create a DDS. As a result, this is the only situation where two DDS will need to be created (one by the non-EU operator, one by the first EU operator) which might seem counter to the idea of “simplification” but the EU have been clear that two are needed in this scenario.
  - As you can no longer 'nest' or combine DDSs, so, raw data will be passed down the supply chain for the first operator to create the DDS
  - Smaller forest owners no longer have to provide GeoJson files. They will be providing a post code in the future. We don't know at this time how that will work in EU Traces
  - EU Traces is due to open again in June once the upgrade is complete
  - There is a new term 'voluntary grouping' we are still trying to work out what this means. It is mentioned in the EU documentation, but without much explanation. Work continues to find a full explanation for this term

- A new TARIC code is being created to be used when re-importing goods to the EU. You may not receive a DDS for goods being exported from the EU. This is dependent on the exports position in the supply chain and if they even received a DDS for the goods. If you don't get a DDS for the goods exported from the EU, you can reimport using a standard reference number (dummy DDS) that will be confirmed by the EU in due course, without the need to create a fresh DDS. However, you do need to have some way of being confident that the goods were previously made available on the EU market (and so a DDS was created back upstream at some point) – if you don't know that, then you DO need to do full due diligence and create a DDS. So, you need a robust paper chain of some sort showing where the books came from, in case of possible future audits
- It has been made clear in the FAQs that goods going directly to a customer (B2C transactions) are exempt from the regulation as we had already determined. But B2B transactions are covered by the regulation
- Some interpretations are using the incoterm to work out who is responsible for creating the DDS, but others are looking at what they are doing in the supply chain

#### **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:**

- Review the BIC guides and update them further with the new simplification information provided by the EU Commission.

Simon Crump, Environmental Consultant for BIC, 1st June 2026