



Book Industry
Communication

BIC Task and Finish Working Group

**Project Name:
EUDR Practicalities: A Fast
Track BIC Project**

bic.org.uk
info@bic.org.uk
44 (0) 20 4551 1570

Copyright © 2025, Book Industry Communication Ltd.



BIC Project Brief

The Purpose of the BIC Project Brief

The BIC Project Brief is required to enable necessary projects or pieces of work to progress from being a good BIC Board or Committee idea to a formal request for work that is submitted to the appropriate Task and Finish Working Group and/ or consultant. The BIC Project Brief must be agreed upon and signed off initially by all members of the BIC Committee responsible for the project and then by the dedicated Task & Finish Working Group (if applicable, depending on the nature of the project) once established.

The BIC Project Brief should generally be short and provide an overview of the proposed project or piece of work.

The finalised, signed off document will be made available to all BIC members, who will be able to provide comment or feedback on the intended project or work.

Document Status: Draft
Project Name: EUDR Practicalities: A Fast Track BIC Project
Version Number: 1.0.0
Created by: Simon Crump
Created date: 20 May 2025
Finalised by: Simon Crump
Finalised date: 20 May 2025

BIC Board/ Committee Review

BIC Board/ Committee	Date submitted
BIC Board – EUDR Subgroup	20 May 2025

BIC Board/ Committee Final Approval

Approved by	Date approved
BIC Board – EUDR Subgroup	20 May 2025

Document History

Version	Summary of Changes	Document Status	Date published
0.9.0	Draft created	For review	20/5/2025
0.9.1	Draft updated to reflect comments from BIC Board	For circulation	20/5/2025
1.0.0	Draft updated to reflect BIC Board feedback – final approved version	Final Version	20/5/2025

Table of Contents

1. **Proposal and background**
2. **Project definition and scope**
3. **Timescale**
4. **Deliverables**

1. Purpose and background

The EU regulation EUDR (European Union Deforestation Regulation) is currently dominating the book industry supply chain. The purpose of this regulation is to prove that any of seven commodities cited, that are being imported and exported in the EU region, are not causing any deforestation or land degradation. Timber and its derivative products are one of the commodities covered by the regulation. The regulation goes live on the 30 December 2025.

Up and down the book industry supply chain organisations are trying to work out how they are going to operate under the regulation. For the book industry this means tracing the supply of all paper products, used in the production of books, back to the geolocations where the trees grew. This will mean process and system changes for all organisations.

In the simplest terms this geolocation data along with the species names of the trees used to make the batch of paper are used to create a Due Diligence Statement (DDS). Each time the commodity code changes a new DDS is required. So, as an example, when all the paper DDSs are known for a particular book a new book DDS is created referencing all the paper product DDSs, as the commodity code has changed from paper to book. As each new DDS references the previous DDSs used in the change of commodity code it is possible to trace the source of the paper back to the tree. Once a book DDS is available that can be quoted on the customs documentation as proof the books are compliant with EUDR for the books being imported into the EU.

For organisations in the EU this process is easier for them as they can use the EU Traces system. EU Traces has been developed for the creation of DDS. It is then easy to follow the chain of custody of a product back to the source material. The challenge for organisations outside the EU is that they cannot currently access EU Traces. There is a proposal with the EU Commission to allow organisations outside the EU to have access to EU Traces, so that they can create DDSs. The EU Commission is expected to decide in June 2025.

It is much more complicated than indicated above for non-EU organisations. Non-EU organisations are struggling to work out how they are going to manage all the data, be that DDS, geolocation, and tree species data. Who in the supply chain can and will be creating DDSs? When and how will they do this? How will all this information be passed up and down the supply chain?

To help with this BIC ran a workshop in April to look at the data flows in the book industry supply chain. This was an interactive workshop with three working sessions:

1. Session 1: reviewed the various maps created prior to the workshop,
2. Session 2: had all the same organisations together to talk what data they expect to receive and how they would pass the data down the supply chain with an emphasis on the “when”, “how” and in what “format”, with the aim of trying to find a consensus on a process,
3. Session 3: split the delegates into groups up and down the supply chain. These groups then looked at specific scenarios to see if they could come to consensus on how to make a scenario work.

The aim of this fast-track project is to build on the work of the workshop. To refine the various data flow maps and come up with practical guidance for the book industry supply chain.

2. Project Definition and scope

The aim of this project is to provide the book industry supply chain with practical guidance on how to implement EUDR. The starting point of the project will be the outcomes from the April BIC EUDR Workshop on EUDR. The challenge will be to find consensus on how to move forward as various people and organisations have different understandings of the regulation.

It is also a changing landscape with the EU Commission still to make decisions on various aspects of the regulation, such as opening access to EU Traces to non-EU organisations and what will be the country risk classifications. The level of risk associated with each country will impact the level of due diligence required by organisations in the supply chain.

The project needs to be fast moving and adaptable to any changes from the EU. Organisations need to make changes to their process and systems, and they need to be doing this now.

The project will start by looking at the overall process and data flow for the majority of product to cover the 80/20 rule. It will start with the various maps created as part of the April workshop. At the same time, it will also have small groups looking at the 20% of product that does not fit the norm, such as POD. The project team will also consider/look at the following points:

- What each organisation in the supply chain must do
- What are the responsibilities of each of the organisations in the supply chain
- What are the best options for transferring large amounts of data
 - When
 - What format
 - Frequency of updates
 - Storage
 - How to pass the information around the supply chain
- We do not have certainty, and hence the project team will need to be adaptable

The project team will need to have knowledge of EUDR and be prepared to make decisions, research information pertaining to the EU documentation, work together to provide feedback to other parts of the project.

It should be noted that the outcomes from this project are not to be construed as legal advice and the BIC members participating in the project should still consult with their own legal counsel.

3. Timescale

The aim would be to complete the project by the end of July 2025.

The BIC Environmental Consultant will devote most of his time to the project, i.e., up to 2 full days a week. The project team or teams will each meet on a weekly basis. The meetings will be recorded for those who cannot attend.

4. Deliverables

- I. A set of “Data Flow” maps

- II. A set of “Practical Guidelines” for organisations across the supply chain to help them navigate EUDR implementation
- III. Project closure report, detailing recommendations for next steps (if any) to be submitted to the Executive Director – for onward circulation to the BIC Board and Green Supply Chain committee.