



**Book Industry  
Communication**

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

**The book industry's supply chain organisation  
UK & Ireland**

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# Purpose of the Document

The purpose of this document is to provide the reader with an introduction to the EUDR Practicalities: A Fast Track BIC Project. It is the first document that the reader should read, as it provides an overview of the whole project and an introduction to the other deliverables provided as a whole package to help navigate The European Union Deforestation Regulation (EUDR).

The document provides a brief introduction to EUDR and the commodities covered under the regulation. It explains that EUDR is about due diligence in the supply chain to make sure the commodities covered by the regulation are not causing deforestation or land degradation. It touches on the implementation of EUDR and the EU due diligence system - EU Traces. It points the reader to BIC's *EUDR Helpful Information* document that explains various requirements of the regulation, and the EUDR data flow maps that BIC has produced.

For any organisation, the importance of thoroughly researching what is going on in the supply chain with regards to data flows, responsibilities, and the need to seek legal advice should be noted by the reader.

# Purpose of the Project

The aim of this BIC project is to provide the book industry supply chain with practical guidance on how to implement the European Union Deforestation Regulation (EUDR). The EUDR regulation that requires seven commodities (cocoa, coffee, soy, palm oil, wood, rubber, and cattle, and their derivatives) are deforestation or land degradation free before they can be imported or exported in the EU. Part of the process requires that organisations undertake a due diligence review of their supply chains. For the timber industry and its derivative products this means tracing back to the geolocation upon which the trees grew.

The outcomes from the in-person April 2025 BIC EUDR Workshop were the starting point of the project. This workshop hosted 35 participants from 22 different organisations. The challenge was to find consensus on how to move forward as various people and organisations had 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. EU Traces is the EU system that allows organisations to declare that due diligence has been performed before the import, export, domestic production or merchandising of products that are in scope of EUDR. The level of risk associated with each country will impact the level of due diligence required by organisations in the supply chain.

# Methodology

For BIC the book industry supply chain covers organisations and trade bodies from the author to the book seller. The Task and Finish Working Group (T&FWG) for this project had 34 members participating from across 19 organisations in the book Industry supply chain.

Under EUDR the responsibility for creating the Due Diligence Statement (DDS) lies with the EU customer/importer placing the goods on the market. A DDS is the statement created in EU Traces that contains the geolocation and species data of the trees used to first make the paper and then the paper used to make the books and can be used to verify that no deforestation or land degradation has taken place. So, in theory UK organisations should only need to pass the required geolocation data down the supply chain. This data can take the form of a DDS for papers that are produced in the EU or geolocation data and tree species information in GeoJSON file format and tree species information. The importing EU entity would then use this data to create the book DDS. The book DDS needs to be created by the EU customer/importer so that the competent authorities, responsible for auditing EUDR, can check that product is compliant with the regulation. These competent authorities do not have jurisdiction to audit countries outside the EU. A new book DDS (as distinct from the paper DDS) needs to be created once a book has been manufactured and it can only be done at that point. This is because a printer needs to record all the paper DDSs (or geolocation data) used in a book's manufacture. A new DDS for the book product is required because the commodity code changes from paper to book.

Therefore, UK organisations, in the supply chain, may decide to follow the requirements of the regulation and only pass basic raw data down the supply chain. This raw data could either be a DDS from paper mills in the EU or geolocation data from mills outside the EU.

The T&FWG felt many EU customers would want to see a DDS in the book's metadata feeds **before** they would place an order. During the duration of the project increased evidence has come to light to suggest that this was indeed a correct assumption. Also, some distributors and warehouses in the UK are of the opinion that if a book did not have a DDS associated with it when it arrived with them, then the book would simply be market restricted for sale in the EU until there was one.

To begin the project, the T&FWG reviewed the eight data flow maps that were created for the April 2025 EUDR Workshop. It was decided that not all 34 of the T&FWG members needed to discuss the maps going forward, so two subgroups were created. The members of the T&FWG then volunteered for which group they wanted to be in. One subgroup looked at the general supply of books and corresponding data, and the other focussed on print on demand (POD).

The full T&FWG met every week to discuss progress of the overall project. Members would feedback information that they had learnt during the week, and there would be a general discussion around other EUDR topics such as how organisations would pass the data through the supply chain and the transition period. The EU Commission has designated a transition period which covers product produced between the 29 June 2023 and the 30 December 2025. Any product produced before 29 June 2023 only must comply with the existing EUTR regulation until 31 December 2028 before it then falls under the EUDR regulation. Product produced between the 29 June 2023 and 30 December 2025 falls under the requirements of EUDR. This is a complex topic that is covered in the BIC EUDR Practicalities - Helpful Information document. Each subgroup provided a short update.

The two subgroups also each met once a week. To begin with the subgroups would discuss the data flow maps and refine the various data flows. The project manager would then update the maps and circulate them for review at the next weekly meeting.

This process continued until consensus was reached and the maps finalised. In the end the original eight maps were reduced to three and a new POD map was created.

One premise behind those maps was that it might be desirable for a DDS to be created as early as possible in the process. A book DDS is required to import goods into the EU to prove that they are made from wood derived materials which are deforestation and land degradation free. There could be various DDSs for the EU papers or raw data for non-EU papers used in the printing of books. Once the paper(s) has been turned into a book, a new book DDS is required as the commodity code has changed from paper to book. Each time an ISBN is reprinted or printed under a Print on Demand (POD) program a new book DDS will be required as the papers used with the new printings will have different DDS numbers or geolocation data.

Once the subgroups had approved the data flow maps their attention turned to other questions around EUDR such as the transition period and access to EU Traces (the EU system that generates the DDS). In the case of access to EU Traces a solution has been found. The transition period is much more complicated, with an understanding that has been reached by the T&FWG, but a full solution is yet to be reached. The current solutions are detailed in the Helpful Information document as part of the deliverables for this project.

## Deliverables

The deliverables for this project are:

- A final report with Executive Summary and recommendations,
- A Helpful Information document for the reader to navigate EUDR with suggestions on what they need to do to be compliant. This document covers:
  - Introduction
  - European Union Deforestation Regulation (EUDR)
  - Access to EU Traces
  - How to create a Due Diligence Statement (DDS)
  - Data maps and explanations
  - Information on what EUDR data Chinese mills can provide
  - Information on what EUDR data US mills can provide
  - Information on what EUDR data Indian printers provide
  - Shipping requirements, documentation and specific EUDR TARIC codes
  - Help with understanding the transition period
  - Risk assessment document for stock currently in warehouses
  - Risk assessment documentation
  - Glossary
- Four data flow maps, for the reader to understand how that flows through the supply chain and is different from the flow of product. These maps are:
  - Product printed in the UK on EU paper
  - Product from ROW to the UK
  - Product from ROW to EU Customer
  - POD Data route of supply
- A set of FAQs

# Executive Summary

The aim of this project was to provide the book industry supply chain with practical guidance on how to navigate EUDR and what an organisation needs to consider. To that end the project has delivered. The T&FWG has gathered a lot of useful information together and through robust conversations come to a consensus on the ideal way the EUDR could be implemented. It must be acknowledged that not all organisations will follow the ideal path as they have no obligations under EUDR as they are located in a non-EU country.

There are different approaches that organisations can take to implement the regulation, with large organisations opting for an external organisation such as Live-EO and osapiens. This could create a two-tier solution to managing EUDR, so it is important that BIC continues to help the book industry supply chain, especially SMEs.

## Recommendations

Our understanding of EUDR is evolving with time, especially when the EU Commission updates their FAQs. Therefore, going forward the T&FWG would recommend:

1. BIC continues to monitor the implementation of EUDR to provide further and updated guidance to the book industry supply chain,
2. Organisations need to take their own legal advice,
3. Organisations need to look both one up and one down from themselves in the supply chain to see how their suppliers/customers are handling the regulation and work with them,
4. Organisations need to work out how they are going to conduct risk assessments of their supply chains, if they have not done so already,
5. Publishers need to conduct a risk assessment into the stock they currently hold during the transition period. This stock might not be compliant with EUDR and therefore cannot be sold into the EU,
6. The book industry supply chain needs to keep talking about EUDR and come to some consensus on how they are going to work together.

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EUDR Practicalities: A Fast Track BIC Project

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