

BIC Green Supply Chain

Update: October 2025



Summary of current position:

- The BIC Green Supply Chain Work Plan tracker has been updated to show what was completed in June. The tracker has been submitted to the BIC Executive Director.
- The Designed for Recycling Project, Part 3 Manufactured Book to End-of-Life, did not meet in October. The Task and Finishing Work Group (T&FWG) felt that there was enough information to complete the report. The project consultant has resumed work on the final report.
- The Sustainability and Environmental Data Reporting Project Part 2 T&FWG did not meet in October. The BIC Environmental Consultant had a meeting with the BIC Executive Director to discuss the project. There is a concern that if BIC and the PA publish results around carbon reporting and the figures are very different it would not make a very good impression. It was agreed that the consultant would send the BIC Executive Director the results of the research carried out by the T&FWG. The BIC Executive Director would then have a meeting with the CEO of the PA to discuss the best way forward for the project.
- The EUDR Practicalities - A BIC Fast Track project has been set up with the kick-off meeting being held on the 29 May 2025. The project has now run for seven weeks, and several updates have been provided during the project's duration. The documentation was reviewed and published on the 14 August 2025.
- 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 deliverables for the BIC EUDR Practicalities Project have been published.

Next steps:

- Write up the final report for The Designed for Recycling Project, Part 3 Manufactured Book to End-of-Life,
- Wait for the outcome of the meeting between the BIC Executive Director and the CEO of the PA to see what the next steps will be for the The Sustainability and Environmental Data Reporting Project Part 2,
- Continue to work with the EUDR project team to provide information around EUDR for the book industry supply chain.

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