

BIC Green Supply Chain

Update: May 2026



Summary of current position:

- The BIC Green Supply Chain Work Plan tracker has been updated to show what was completed in April. The tracker has been submitted to the BIC Executive Director.
- The Designed for Recycling Project, Part 3 Manufactured Book to End-of-Life, Task and Finishing Working Group (T&FWG) did not meet in May. The project consultant is currently revising and clearing any outstanding permission and will then return the report to the BIC Executive Director for final review.
- The Sustainability and Environmental Data Reporting Project Part 2 T&FWG met once in May. The T&FWG have gathered all the information they can around data reporting. The team is now looking at how this can be displayed and easily updated on a yearly basis. So, the team have come up with the following options:
 - Working out the percentage of publishers who are reporting or gathering information on their carbon footprint as a percentage of the total number of publishers.
 - Working out the percentage of publishers who are reporting or gathering information on their carbon footprint as a percentage of all books sold in the UK.
 - The idea of providing a CO₂e number across the publishing industry is proving hard due to the way the information is being gathered. Also, not all publishers are currently reporting on their Scope 3 emissions.
- 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 was 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) 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 Designed for Recycling, Part 3 Manufactured Book to End of Life final report has been returned to the project consultant for revision and obtaining the final permissions,
- The EUDR Guidance documentation has been revised considering the changes to the regulation.

Next steps:

- Return the revised report to the BIC Executive Director for The Designed for Recycling Project, Part 3 Manufactured Book to End-of-Life for final approval,



- The Sustainability and Environmental Data Reporting Project Part 2 project in 2026 to continue looking at ways to present the data,
- Continue to work with the EUDR project team to provide information around EUDR for the book industry supply chain.

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1st June 2026

