



EIBF INFOSHEET

EU Regulation on Deforestation-Free Products

JUNE 2026 // EUROPEAN AND
INTERNATIONAL BOOKSELLERS FEDERATION

 **eibf**
The voice of booksellers

TABLE OF CONTENTS

Who Is This Info Sheet For?	2
Background	2
What Is The EUDR?	3
To Whom Does The EUDR Apply?	3
Relevant Products In Scope	3
Key Obligations For Booksellers	5
Illustrated Examples	9
Country Risk Classification and Product Checks	11
Reporting Through The Information System TRACES	12
What Happens If You Don't Comply With The EUDR	12
What Happens Next	12
Appendix	13
Useful Resources	14
Sources	14

WHO IS THIS INFO SHEET FOR?

If you are a bookseller selling stationery, coffee, chocolate or any of the products listed in table 1 below in the EU, or exporting any of these products, this info sheet is for you.

The aim of this info sheet is to provide you with the necessary information and guide you through the obligations you will have under the (revised) EU Deforestation Regulation (EUDR).

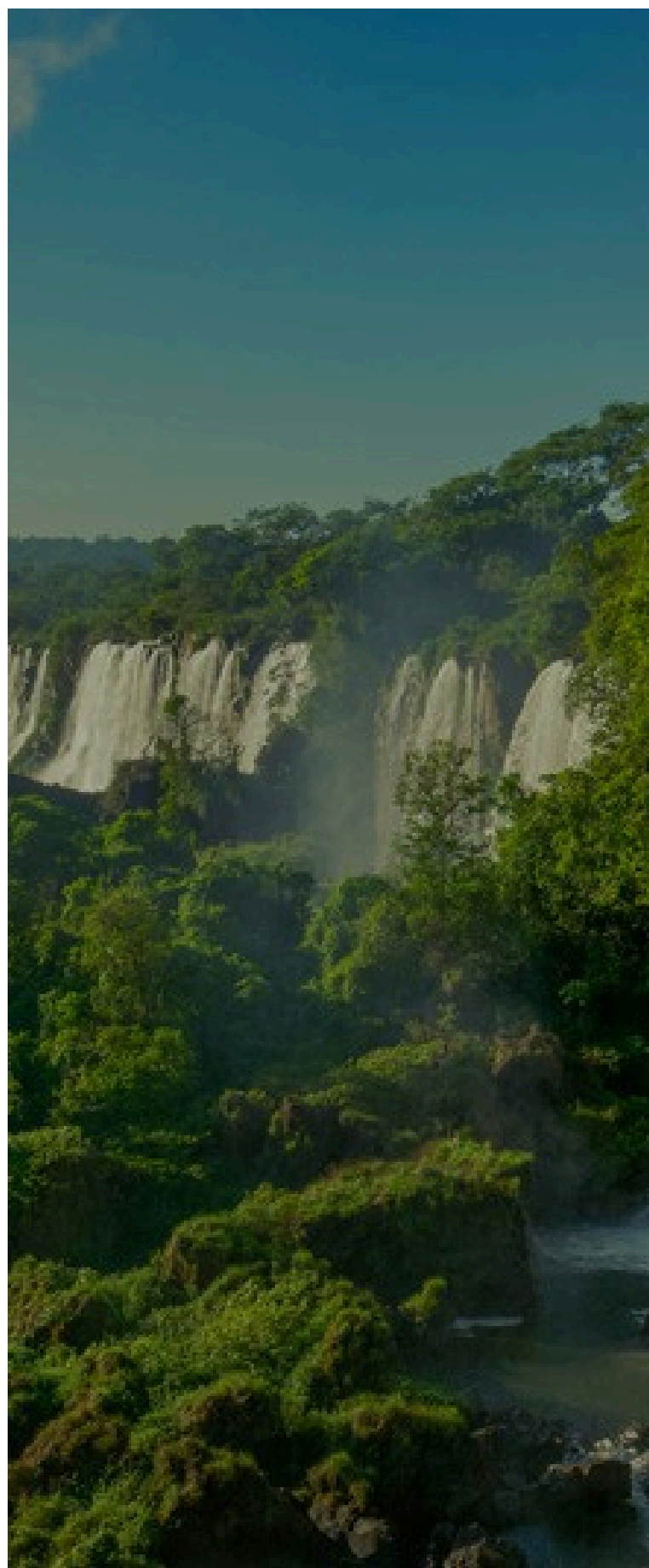
BACKGROUND

During the revision of the EUDR in October 2025, the European and International Booksellers Federation (EIBF) joined a broad coalition of the book, magazine and newspaper publishing sectors in calling on the co-legislators – the Council of the EU and the European Parliament – to exclude printed products such as books from the EUDR.

After extensive advocacy efforts from EIBF, its members and partners, the EU co-legislators agreed that books should be removed from the scope of the EUDR in December 2025 – proving a historical recognition by EU institutions of the importance of the cultural and literary sectors.

Nonetheless, many product categories that are handled by booksellers, such as stationeries, coffee, chocolate etc., remain within the scope of the EUDR. Therefore, EIBF has prepared this info sheet, which outlines relevant products in scope and the obligations that may fall upon booksellers.

*Please note that this document was prepared in June 2026, and cannot account for any potential changes made at a later stage. EIBF advises readers to verify that there have been no further updates to the legislation before adhering to the recommendations made in this document.



WHAT IS THE EUDR?

The EUDR is an EU Regulation that sets out binding rules and reporting obligations for all businesses and ‘economic entities’, that make available **cattle, cocoa, coffee, palm oil, rubber, soy and wood**, along with certain derived products, on the EU market or export them from the EU. The aim of the regulation is to:

- minimise the EU’s contribution to **global deforestation and forest degradation**;
- reduce the EU’s contribution to **greenhouse gas emissions and global biodiversity loss**.

TO WHOM DOES THE EUDR APPLY?

The regulation covers economic actors, i.e. businesses, like bookshops, along the whole value chain.

The Regulation’s obligations vary depending on the size of the enterprise, and/or the country from which the goods are sourced.

In the next section you will find a simplified overview of the obligations the EUDR places on booksellers. For a full overview of obligations for all businesses, please consult table 4 in the Appendix.

RELEVANT PRODUCTS IN SCOPE

The EUDR rules apply only to a list of product categories, and a number of derived products from these materials (like chocolate derived from cocoa beans, for instance). Below you’ll find a list of in-scope product categories, as well as derived products, which may be relevant to booksellers. Please note that the below list is non-exhaustive. You can find a full list of all products covered by the Regulation in [Annex 1](#) to the EUDR.

EUDR GLOSSARY: KEY CONCEPTS EXPLAINED

An EU regulation: is a binding legislative act. It must be applied in its entirety across all EU Member States.

Application date: The EUDR has been in force since 29 June 2023, but application has been postponed over two rounds and its rules are now expected to apply from 30 December 2026 for medium and large businesses, and 30 June 2027 for micro and small enterprises. (See definitions of micro, small and medium enterprises [here](#))

Cut-off date: 31 December 2020, meaning that all products in-scope produced after 31 December 2020 must comply with the EUDR if they are to be placed or made available on the EU market or exported from the EU.

RELEVANT PRODUCTS IN SCOPE

If your bookshop handles any of the below products in your daily business, we advise you to read the next section with care in order to understand the obligations you will have under the EUDR.

Table 1 - Products in the scope of the EUDR

Product category	Relevant derived products
Coffee	Coffee beans, whether or not roasted or decaffeinated, and coffee substitutes containing coffee in any portion
Cocoa	Cocoa beans, shells, paste and butter, cocoa powder, chocolate and other food preparations containing chocolate
Wood	<ul style="list-style-type: none"> • Stationery: <ul style="list-style-type: none"> ◦ envelopes, letter cards, postcards, boxes, wallets and writing compendiums containing an assortment of paper stationery ◦ Notebooks, letter pads, diaries and exercise books ◦ Binders, folders, file covers and albums • Paper and paperboard • Bobbins, spools and similar supports of a kind used for winding yarn • Wooden frames for paintings, photographs, mirrors or similar objects • *Cartons, boxes, cases, bags and other packing containers, of paper or paperboard, of a kind used in offices, shops or the like • *Furniture, tools, packing cases, boxes or crates made of wood <p>* These products are only in scope when sold individually. If used solely as packaging (e.g., crates for shipping books), they are not considered relevant under the EUDR, and no EUDR obligations apply to businesses handling them as such.</p>
Soya	Soy bean flour and meal

KEY OBLIGATIONS FOR BOOKSELLERS

If your bookshop stocks, sells, imports to or exports from the EU market any of the relevant products in table 1, you must make sure you comply with EUDR rules.

However, there are two factors that influence what obligations you will have:

1. **The country in which your supplier is based**
2. **The size of your business**



You are a small or micro business if you have less than 50 employees and a balance sheet total / turnover of €10 million or less



You are a medium or big business if you have more than 50 employees and a balance sheet total / turnover of above €10 million

* You can find all details on what is defined as micro, small or medium-sized company on the European Commission's website [here](#).

EUDR GLOSSARY: KEY CONCEPTS EXPLAINED

Due Diligence Statement (DDS): A DDS is a formal declaration confirming that a company has assessed and mitigated the risk of its products being linked to deforestation or forest degradation. To complete a DDS, the company must:

1. **Collect information, documents and data from each supplier**, including, among other things, the geographic/geolocation coordinates of the plots of land where the commodities were produced, demonstrating that there has been no deforestation at the location of production. See a full list of the required information in [Article 9](#) of the EUDR.
2. **Verify and analyse that information and carry out a risk assessment**
3. **Adopt risk mitigation measures**, if necessary.

*Point 2 and 3 are only necessary if the goods come from high-risk countries. See more on this in the corresponding section below.

EUDR GLOSSARY: KEY CONCEPTS EXPLAINED

Simplified Due Diligence: In certain cases (see details in table 4), for instance when dealing with products from low-risk countries, only a simplified Due Diligence is required. In the case of a simplified procedure, only the first item in the DDS, i.e., the collection of relevant information, is necessary. Neither risk assessments nor risk mitigation measures are required.

Simplified Declaration: Micro or small primary operators from low-risk countries (typically farmers or foresters) may, instead of a DDS, upload a one-time simplified declaration to the EUDR Information System.

DDS Reference Number: is issued after a DDS is submitted to the Information System TRACES. It is the obligation of the first entity in the EU-based value chain, to pass on this reference number along the value chain. In the case of import, the reference number is required to complete the customs declaration.

One DDS can be used for multiple shipments or batches for a period of 1 year, and thus its reference number can also be used for several customs declarations.

Authorised Representative: A business that is obliged under the EUDR to perform due diligence may choose to mandate an authorised representative (which can be a separate company, or a company at any stage in the value chain) to submit their DDS in the information system on their behalf. However, the responsibility for the compliance of the products remains with the business and cannot be transferred to the representative. Authorised representatives must register separately in the Information System.

Customs Representative: is tasked to lodge the customs declaration on behalf of another person or business. May be the same as 'Authorised Representative'.

KEY OBLIGATIONS FOR BOOKSELLERS

On the following pages, you will find a simplified overview of the obligations befalling booksellers that handle any of the relevant products (table 2 and 3), as well as illustrated examples.

Table 2 - Simplified overview of booksellers' obligations under the EUDR (EU-based value chain/import)




Booksellers' EUDR obligations	
 Your supplier is based in the EU <i>You as a booksellers must:</i>	 Your supplier is based in a (low-risk) country outside the EU <i>You as a booksellers must:</i>
<p>Collect and keep the following information for 5 years:</p> <ul style="list-style-type: none"> The name, postal address, email and web address of the upstream and downstream businesses who have supplied or purchased the product 	<p>Trace the relevant products back to the plot of land where they were produced and assume responsibility for their EUDR compliance.</p>
<p>Only sell products if the above information has been collected.</p>	<p>Register as an entity in the EUDR Information System TRACES, declare you have exercised due diligence and upload DDS documentation to the information system.</p>
<p>Notify competent authorities if you are made aware of information suggesting that the relevant products may be at risk of non-compliance.</p>	<p>The DDS reference is then required to complete the customs declaration for import.</p>
<p><u>Medium or large bookshops only:</u> Must register as an entity in the EUDR Information System TRACES.</p>	<p>Communicate to actors downstream in the supply chain the relevant DDS reference numbers (if you sell the relevant products to another business).</p>

Table 3 - Simplified overview of booksellers' obligations under the EUDR (export)

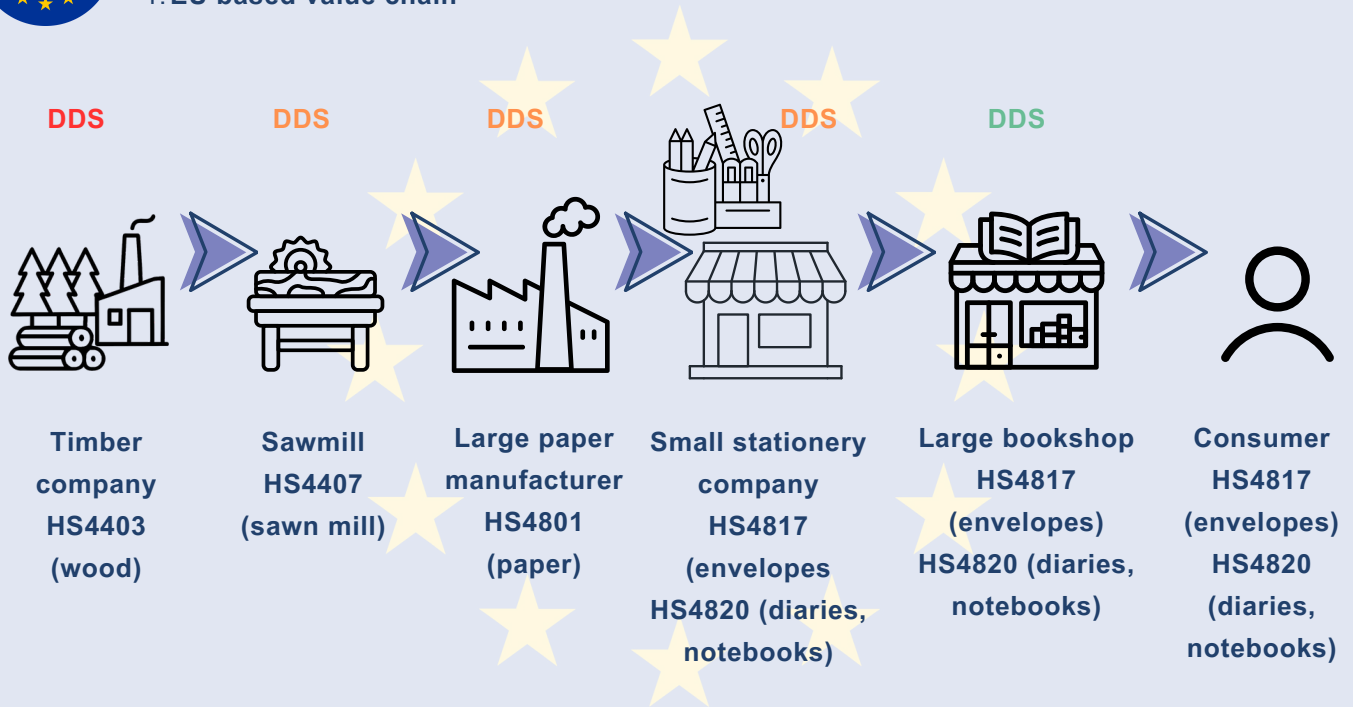


EXPORT To customers or businesses based outside the EU	
<i>Product already has a DDS (provided by your EU-based provider)</i>	<i>Product does <u>not</u> have a DDS</i>
<i>You as a booksellers must:</i>	<i>You as a bookseller must:</i>
<p>Collect and keep the following information for 5 years:</p> <ul style="list-style-type: none"> The name, postal address, email and web address of the upstream and downstream operators/traders who have supplied or purchased the product 	<p>Trace the relevant products back to the plot of land where they were produced and assume responsibility for their EUDR compliance.</p>
<p>Only export the product if the above information has been collected.</p>	<p>Register as an entity in the EUDR Information System TRACES, declare you have exercised due diligence and upload DDS documentation to the information system.</p>
<p>Notify competent authorities if you are made aware of information suggesting that the relevant products may be at risk of non-compliance.</p>	<p>The DDS reference is then required to complete the customs declaration for export.</p>
<p><u>Medium or large bookshops only:</u> Must register as an entity in the EUDR Information System TRACES.</p>	<p>Communicate to actors downstream in the supply chain the relevant DDS reference numbers (if you sell the relevant products to another business).</p>
<p><i>Note on customs: when exporting relevant goods, you are not required to provide the DDS reference in your customs declaration. However, it is your responsibility under the legislation to verify whether the product you are exporting is already covered by a DDS!</i></p>	

ILLUSTRATED EXAMPLES



1. EU based value chain



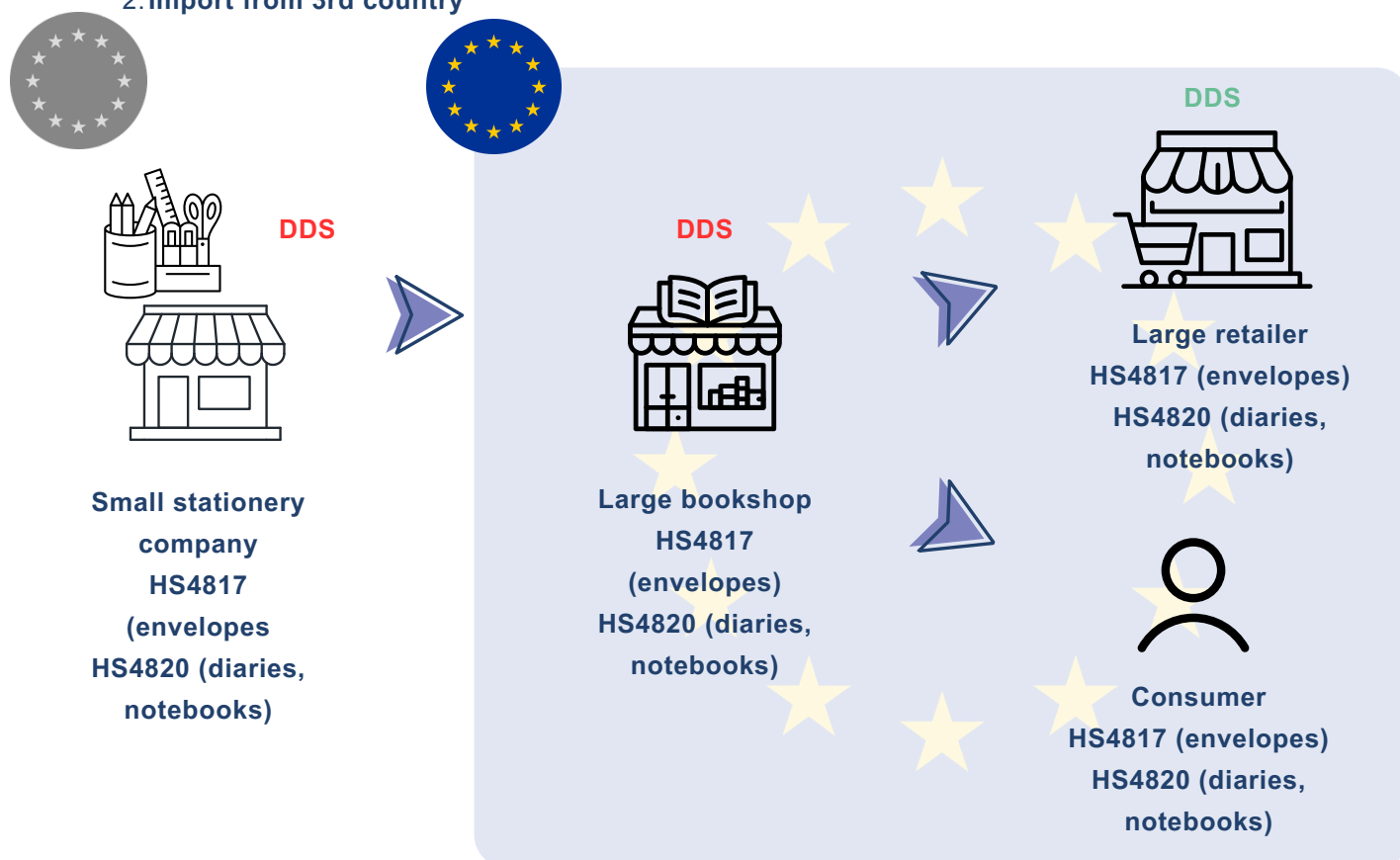
A large timber company in Finland sells logs (HS 4403) that it sources from its own forests. **The timber company** places a relevant good (wood in the rough) on the EU market and must exercise due diligence, submit a DDS to the information system and resume responsibility that its products are deforestation fee.

A small sawmill in Finland buys the logs and transforms them into sawn wood and then **a large paper manufacturer** in Estonia transforms them into paper. Both companies are thus placing a 'new' product on the market. However, since the sawn mill and paper are made entirely from the logs, all of which are covered by a DDS, the sawmill and the paper manufacturer are only required to collect and keep DDS reference numbers from the timber company, as well as keeping records of their supplier for 5 years. **The paper manufacturer** must also register as an entity in the EUDR information system, because it is considered a large company

A small stationery company in Italy buys some of the paper from the Estonian **paper manufacturer** and turns it into envelopes (HS4817) and diaries (HS4820), both relevant products under the EUDR. As it uses paper already covered by a DDS, the Italian stationery producer only needs to collect the DDS reference numbers from the paper manufacturer and keep information on its supplier in its records for 5 years.

A large bookshop in France buys envelopes and diaries from the **Italian stationery producer**. As the bookshop is positioned downstream in the value chain and both products are already covered by a DDS, the bookseller only needs to keep a record of its supplier for 5 years as per table 2. Since **the bookshop** is considered a large company, it must also register as an entity in the EUDR Information System TRACES.

2. Import from 3rd country



A **medium-sized bookshop** based in Sweden buys its stationery from a **large stationery producer** based in Japan (a 3rd country outside the EU). The **bookshop** then sells stationery directly to customers and to a **large retailer**.

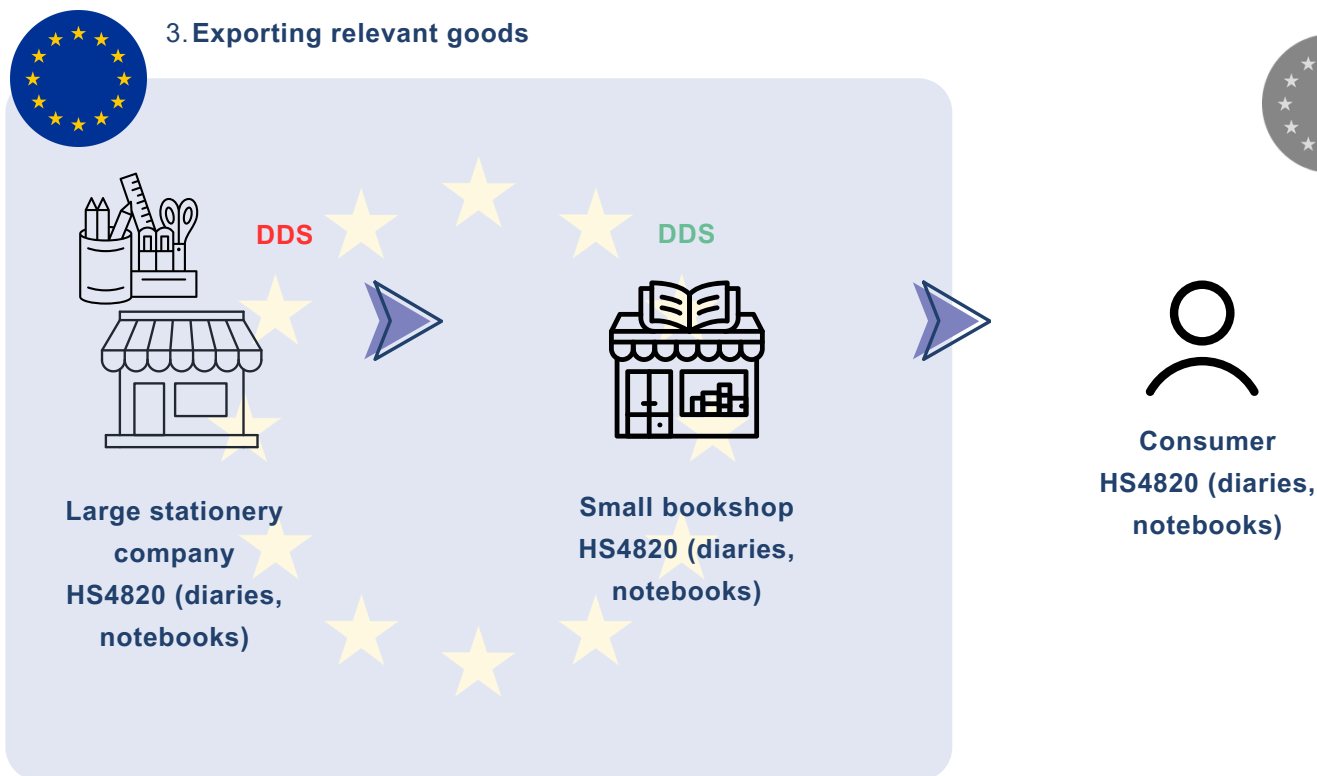
The **Japanese stationery producer** has a valid EORI number (identification number for import to the EU) issued by an EU Member State and can thus access the EUDR information system and sell its products to EU-based companies or customers. The **stationery producer** is obliged to exercise due diligence, submit a DDS to the Information System and include the DDS reference number in the customs declaration prior to import to the EU.

In this case, **the bookshop** is the first EU-based company in the value chain and, as such, must also exercise due diligence and submit a separate DDS to the Information System. The DDS reference number is then

required to complete the customs declaration for import. Please note that, one DDS can be used for multiple shipments or batches from the same provider for a period of 1 year, and thus its reference number can also be used for several customs declarations.

In this scenario, due to limited resources, **the bookshop** has designated **the large retailer** downstream in the value chain as its **authorised representative**, to submit the DDS on its behalf. The **large retailer** must therefore register separately in the EUDR information system.

However, **the large retailer** only acts as a *service provider*, meaning that **the bookshop** remains ultimately responsible for the compliance of the stationery products. The **large retailer** is only required to collect and keep the DDS reference number, as well as records of the contact details to the bookshop as its supplier.



A small Irish **bookshop** buys diaries from a French **stationery manufacturer**. The **bookshop** sells the diaries in its online shop to **customers** based in Ireland and the UK.

As UK **consumers** are based in a 3rd country outside the EU, the Irish **bookshop** must verify that the diaries are covered by a DDS before shipping them to the UK. In this case, the French **stationery manufacturer** has fulfilled its EUDR obligation and prepared a DDS for the diaries. The **bookshop** is then not required to submit a DDS reference number in its customs declaration and may go ahead and ship the diaries to its **UK-based customers**.

RISK CLASSIFICATION AND PRODUCT CHECKS

The EUDR introduces a benchmarking system that classifies EU Member States and non-EU countries as low, standard, or high risk for deforestation and forest degradation. This classification determines the level of due diligence required: businesses sourcing from low-risk countries can use a simplified due diligence process, which only requires collecting supplier information (e.g., geolocation coordinates of production plots etc. See details in the EUDR glossary on page 4) without needing risk assessments or mitigation

measures. For high-risk countries, stricter controls apply, with 9% of businesses inspected compared to just 1% for low-risk sources.

Currently, most countries, including all EU Member States, are classified as low-risk, while only four countries (Belarus, North Korea, Myanmar, and Russia) are considered high-risk. The full list of country classifications is available in Annex 1 to the Implementing Regulation [here](#).

REPORTING THROUGH THE INFORMATION SYSTEM TRACES

The digital information system is a software application based on the [TRACES platform](#). The system is designed to facilitate the transfer of information between businesses, their authorised representatives, EU Member States' [competent authorities](#) (that have been tasked with EUDR enforcement) and customs authorities.

Here, all due diligence statements and simplified declarations should be uploaded.

WHAT HAPPENS IF YOU DON'T COMPLY WITH THE EUDR?

The regulation includes rules on penalties for non-compliance. These penalties should include, among other things, fines proportionate to the environmental damage and the value of the commodities or products, which must be set at a level of at least 4 % of the business' annual turnover in the EU, and temporary exclusion from public procurement processes and/or from access to public funding.

WHAT HAPPENS NEXT?

The EUDR will be applicable to medium and large companies as of 30 December 2026 and to small and micro businesses as of 30 June 2027.

All economic entities, including bookshops, handling products within the scope of the regulation must ensure that they are ready to comply with the rules and reporting obligations by this time.

For more information to help you prepare in your national context, you are encouraged to reach out to your booksellers association and/or to your national competent authority (you can find a list of competent authorities [here](#)).



APPENDIX

Table 4 - Comprehensive overview of obligations under EUDR

Role	Definition	Obligations	Due diligence obligations
Primary operator	<p>Primary operators are those who place on the market, for the first time, products which they themselves have produced, i.e. grown, harvested, obtained from or raised. Often this refers to a farmer or forester.</p> <p>This generally does not refer to booksellers.</p>	Trace the relevant products sold back to the plot of land where they were produced and assume responsibility for the EUDR compliance of the product.	<p>Declare they have exercised due diligence and upload DDS documentation to the information system Traces.</p> <p>Communicate to downstream operators and traders in the value chain the relevant DDS reference numbers for the products and the fact that they are the primary operator.</p> <p>Micro or small primary operator from low-risk countries (typically farmers or foresters): may upload a simplified, one-off declaration to the Information System, receiving a 'declaration identifier' to be passed on downstream.</p>
Upstream operator	<p>An entity placing a relevant product for the first time on the EU market, importing or exporting from there.</p> <p>Could refer to booksellers in the case of export of relevant products <u>without</u> a prior DDS, or import from non-EU suppliers.</p>	Trace the relevant products sold back to the plot of land where they were produced and assume responsibility for the EUDR compliance of the product.	<p>Declare they have exercised due diligence and upload DDS documentation to the information system Traces.</p> <p>Communicate to downstream operators and traders in the value chain the relevant DDS reference numbers for the products.</p>
Downstream operators and traders	<p>An entity who, in the course of a commercial activity, places on the market, or exports relevant products already covered by a DDS or by a simplified declaration.</p> <p>Typically refers to booksellers when the supplier is EU-based. Could refer to booksellers in the case of export of relevant products <u>with</u> a prior DDS to non-EU companies.</p>	<p>Collect and keep the following information for 5 years: The name, postal address, email and web address of the upstream and downstream operators/traders who have supplied or purchased the product</p> <p>May only make available relevant products or export if the above information has been collected.</p> <p>Must notify competent authorities if they are made aware of information suggesting that their relevant products may be at risk of non-compliance.</p> <p>Large companies (e.g. larger bookshop chains): must register as an entity in the</p>	<p>In case the supplier is a primary operator (i.e., those who place on the market products which they have themselves produced, grown, harvested or raised), the reference numbers of the due diligence statements (DDS), or the declaration identifier associated to the product, must be collected and kept in the records.</p>

MORE INFORMATION AND USEFUL RESOURCES

A list of all national competent authorities, tasked with EUDR enforcement:

<https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/f044a917-4640-4169-ad0a-d63609cfca55/details>

General Information on the Information System TRACES (including videos and link to training sessions):

https://green-business.ec.europa.eu/deforestation-regulation-implementation/information-system-deforestation-regulation_en

FAQs and guidance document from the European Commission:

https://green-forum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation_en

Infographic on supply chains from the European Commission:

<https://op.europa.eu/en/publication-detail/-/publication/0fd4de13-4371-11f1-8095-01aa75ed71a1>

SOURCES

EU combined nomenclature:

https://taxation-customs.ec.europa.eu/customs/common-customs-tariff-cct/tariff-classification-goods/combined-nomenclature_en

EUR-Lex, EUDR, consolidated text:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02023R1115-20251226>

EUR-Lex, EUDR Summary:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM%3A4680738>

SOURCES

European Commission:

https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en

European Commission delegated act and review:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/18053-Deforestation-proposal-to-amend-and-simplify-the-rules-and-make-technical-fixes-to-Annex-I_en

This info sheet was produced by the European and International Booksellers Federation (EIBF) in June 2026



European and International Booksellers Federation (EIBF)
Square Marie-Louise 69
1000 Brussels
Belgium

Get in touch!
Email: info@europeanbooksellers.eu
Telephone: +32 (0) 2 580 18 11
Visit: <https://europeanbooksellers.eu>



JUNE 2026 // EUROPEAN AND
INTERNATIONAL BOOKSELLERS FEDERATION

