

Clarifying the role of geolocation data in EUDR compliance

March 2025

To ensure the best understanding for all actors in the pulp, paper and print value chain, it is necessary to address the misconceptions about the need for geolocation data to achieve compliance with the EU Deforestation Regulation (EUDR).

The EUDR requires geolocation data of the area where wood is harvested to be collected and made available to Competent Authorities before placing wood on the EU market for the first time or before importing wood or wood-based products into the EU. While this information is crucial for traceability, it is not expected to be automatically available or accessible to all actors along the value chain via the EUDR Information System, nor it is needed for downstream operators to be compliant with the Regulation.

To be able to successfully submit a due diligence statement, downstream operators don't have the obligation to collect geolocation information if that is already in the Information System and may rely on the supplier's Due Diligence Statement reference number and verification number only, after having ascertained that the supplier has a robust due diligence system in place¹. DDS reference and verification numbers are therefore the only information that should systematically be communicated along the value chain. Consequently, geolocation data do not need necessarily to be provided to the downstream operator or trader, and in any case that information could not be accessible via the EU Information System. Geolocation information could be provided occasionally, if deemed necessary in the course of risk assessment or risk management activities.

The EUDR Information System, which compiles all Due Diligence Statements, is not designed to provide full disclosure to all users, but only to Competent Authorities. Should the first operator decide to make the geolocation data visible to its customer, each actor down the value chain has the discretion to further make them visible or not to their direct customers. As a result, companies further down the value chain - such as printers, publishers, or retailers - may never have access to the geolocation data of the wood-based products that they are placing on the market by means of the EU Information System.

¹ See Art.4(9).