

Voluntary Report – Voluntary - Public Distribution

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Report Name: EU Adopts Changes to Deforestation Regulation

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Post: Brussels USEU

Report Category: Policy and Program Announcements, Oilseeds and Products, Wood Products, Livestock and Products

Prepared By: Sophie Bolla

Approved By: Tyler Babcock

Report Highlights:

On December 23, 2025, the European Union published Regulation 2025/2650, which is an amendment to the controversial EU Deforestation Regulation (EUDR). The published amendments officially delay the EUDR's entry into application until December 30, 2026. The amendments also create new definitions that provide simplifications to some, primarily EU, operators, and excludes paper products from the scope of application. The new Regulation also calls on the Commission to publish a simplification review of EUDR by April 30, 2026.

Entry into Application Postponed until December 30, 2026

On December 23, 2025, the European Union published [Regulation 2025/2650](#) amending the EU Deforestation Regulation (EUDR - [Regulation 2023/1115](#)) in the Official Journal¹. This amendment postpones the entry into application of the EUDR by one year, to December 30, 2026, for most operators, and June 30, 2027, for small and medium sized operators.

This follows a previous postponement of the application of EUDR in December 2024 which had delayed entry into force to December 2025².

In addition to delaying the EUDR's entry into application, Regulation 2025/2650 introduces other amendments to address domestic EU concerns. There are three main elements of the amendments:

1. **Streamline the due diligence requirements** by introducing new types of operators (see *New Types of Operators* section below). This responds to concerns raised by Member States and stakeholders regarding administrative burden and the readiness of the IT system necessary for the effective functioning of the EUDR.
2. Remove from the scope certain **printed products** (such as books, newspapers, printed pictures), reflecting the limited deforestation risk associated with these items.
3. Obligate the European Commission to conduct a **simplification review of the regulation and present a report by April 30, 2026**. The report should evaluate the impact and administrative burden of the EUDR, particularly for smaller operators, and should, where appropriate, be accompanied by a legislative proposal.

New Types of Operators and their Reporting Requirements

Regulation 2025/2650 introduces two new types of operators:

'Downstream operator' means “any natural or legal person who, in the course of a commercial activity, places on the market or exports relevant products made using relevant products, all of which are covered by a due diligence statement or by a simplified declaration.”

Example: a company that makes chocolate bars using cocoa beans.

¹ More information about the Regulation can be found in GAIN Report: [European Institutions Finalize Deforestation-Free Supply Chain Regulation](#).

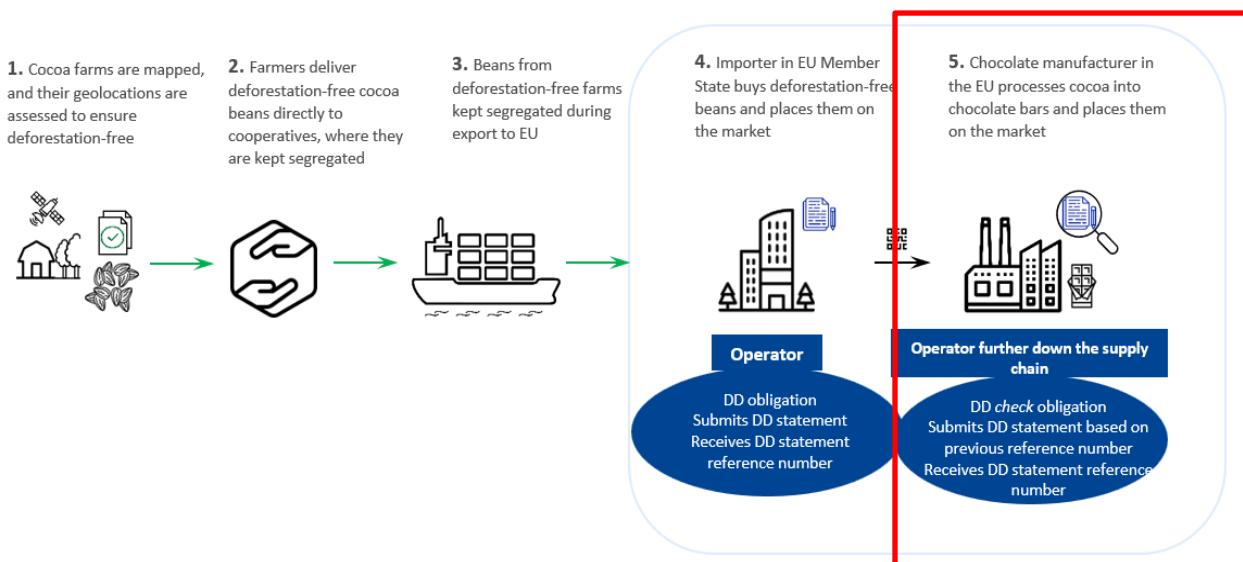
² For more information about the 2024 delay, please see GAIN Report: For more information, please see GAIN report: [EU Deforestation Regulation - Revised Implementation Timeline for 2025](#).

This new operator, as defined by the Regulation, can only apply to EU-based companies which produce further processed products in the Union. Products of U.S. origin will always need to be imported into the EU by an “operator” as defined by the Regulation’s article 2³ and therefore cannot benefit from the simplifications for “downstream operators”. The operator importing U.S. origin products will need to submit a due diligence statement and receive a due diligence statement reference number, which will require the operator to verify certain information including geolocation data.

Those entities that do classify as downstream operators (e.g., chocolate bar producer in the EU) would not have to verify that upstream operators (e.g., cocoa bean supplier) exercised due diligence. The due diligence obligation continues to fall to the entity placing the product on the EU market. Downstream operators will still be required to register in EUDR information system to ensure full traceability by collecting and passing on reference numbers and declaration identifiers from the upstream operators.

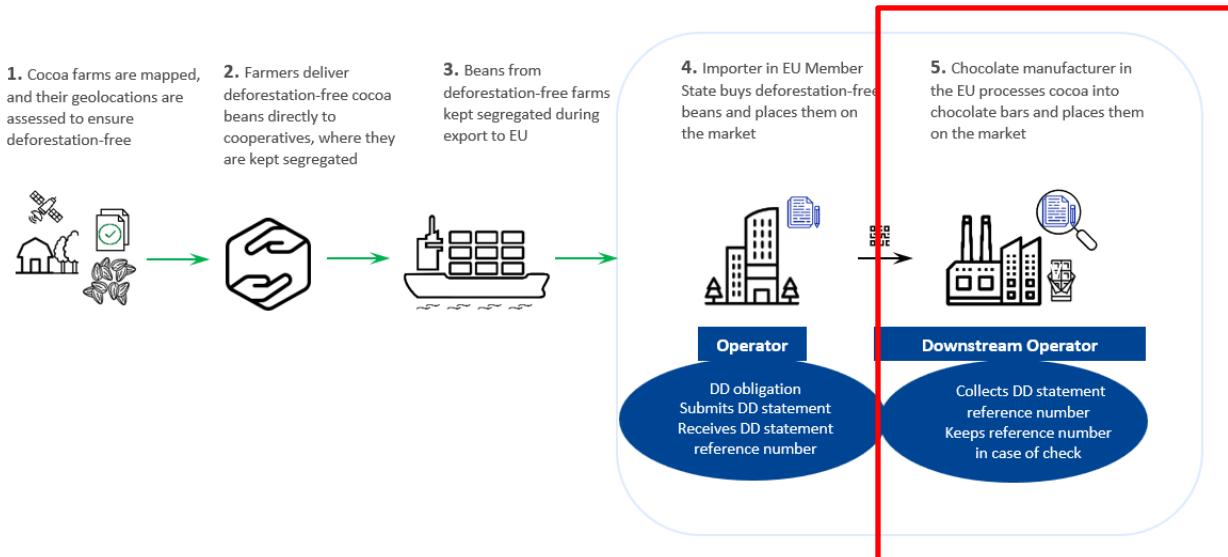
Please find below infographics, using a chocolate bar producer as an example, that showcase the differences between the former and revised EUDR requirements. The infographics highlight the reduced burden on downstream operators relative to operators along the supply chain in the original 2023 EUDR (Infographic 1). The requirements for the newly defined “downstream operators” under the revised 2025 EUDR (Infographic 2) are obligated to collect due diligence reference numbers from suppliers, but they are not obligated to submit a due diligence statement verifying compliance.

Infographic 1: Original 2023 EUDR



³ An ‘operator’ means any natural or legal person who, in the course of a commercial activity, places relevant products on the market or exports them.

Infographic 2: Revised 2025 EUDR



Source: FAS Brussels based on a European Commission infographic

‘Micro and small primary operator’ means an “operator who is a natural person or a micro- or small-sized undertaking [...] irrespective of its legal form, established in a country classified as low risk in accordance with Article 29 of this Regulation, and who, in the course of a commercial activity, places on the market or exports relevant products that this operator itself has grown, harvested, obtained from or raised on relevant plots of land, or, as regards cattle, on establishments [...].

Example: a farmer who sells cattle to a slaughterhouse for further processing.

This new operator, as defined by the Regulation, can only apply to farmers, ranchers and/or forest owners who can place their own products directly on the EU market. It favors EU producers, as third-country micro and small producers use an importer, who under EUDR is the operator, to sell their products into the EU⁴. According to the Commission, the new category would cover almost all EU farmers and foresters⁵.

Those entities that do classify as micro and small primary operators would benefit from a simplified regime and would have to submit a one-time simplified declaration in the information system. The information required is provided in Annex III of the Regulation.

As part of this simplified regime, micro and small primary operators can replace the geolocation coordinates required under EUDR with the postal address of all plots of land or the postal address of the

⁴ According to EUDR Article 33 Para two, the information system shall provide for the registration of operators and traders pursuant to Article 9 of Regulation 952/2013. Article 9 provides a path for operators established in the customs territory of the Union. Third-country operators are not eligible to register in the EUDR Information System and therefore this simplification does not benefit third-country micro and small primary producers.

⁵ Please see Commission press release “Commission proposes targeted measures to ensure the timely implementation of EU Deforestation Regulation” https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2464

establishment from which the relevant commodities that the relevant product contains, or has been made using, were produced.

Attachments:

No Attachments.