

INTERU · EUDR READINESS

EUDR — what has changed for the UK packaging industry?

SECTION 01

What is the EUDR?



WHAT IS IT?

A due diligence regime for the EU market

The EUDR was enacted in June 2023 and will be enforced from **30 December 2026**.

It requires companies importing relevant products into the EU to evidence that their products are:



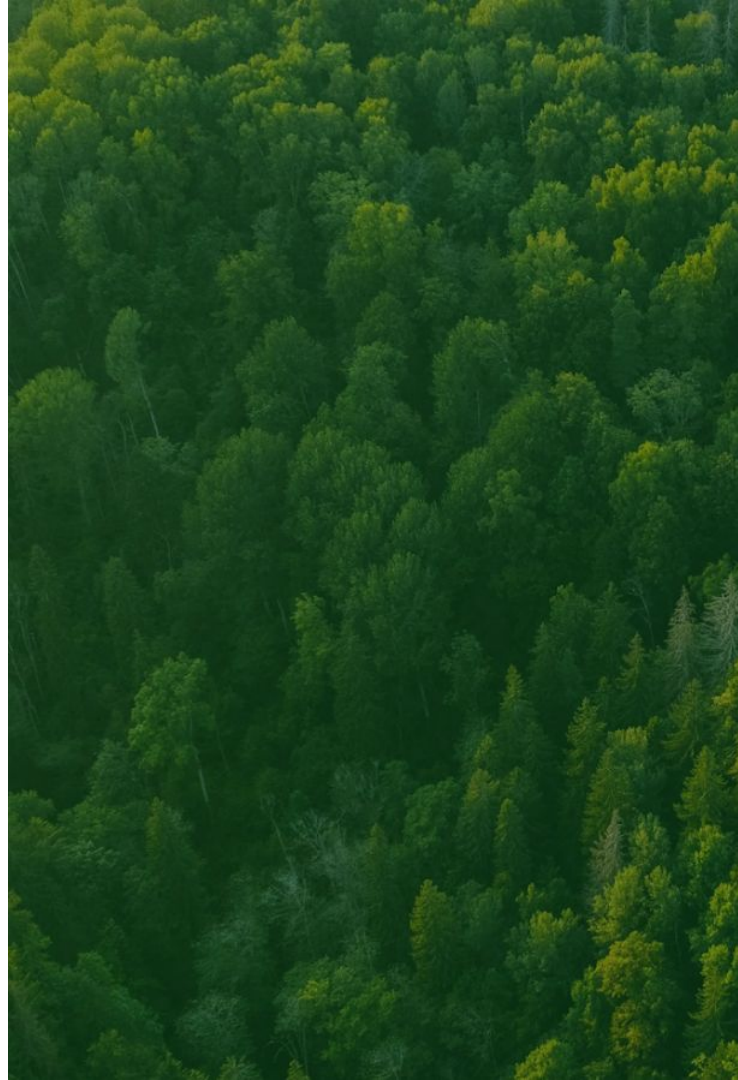
Deforestation- and degradation-free



Produced in line with the legal requirements of the country of origin

DUE DILIGENCE STATEMENT

To be placed on the EU market, products must be accompanied by a **DDS**. EU companies must operate a system of due diligence.



EUDR: Why and why now?

Illegal logging is the world's 3rd largest transnational crime, behind drug trafficking and counterfeiting, but ahead of illegal weapons trade and human trafficking.

Table X1. The Retail Value of Transnational Crime

Transnational Crime	Estimated Annual Value (US\$)
Drug Trafficking	\$426 billion to \$652 billion
Small Arms & Light Weapons Trafficking	\$1.7 billion to \$3.5 billion
Human Trafficking	\$150.2 billion
Organ Trafficking	\$840 million to \$1.7 billion
Trafficking in Cultural Property	\$1.2 billion to \$1.6 billion
Counterfeiting	\$923 billion to \$1.13 trillion
Illegal Wildlife Trade	\$5 billion to \$23 billion
IUU Fishing	\$15.5 billion to \$36.4 billion
Illegal Logging	\$52 billion to \$157 billion
Illegal Mining	\$12 billion to \$48 billion
Crude Oil Theft	\$5.2 billion to \$11.9 billion
Total	\$1.6 trillion to \$2.2 trillion

https://gfintegrity.org/wp-content/uploads/2017/03/Transnational_Crime-final.pdf

Our belief: Traceability will become commonplace

01

Regulatory led

Companies face more pressure than ever: packaging waste regulation (PPWR), digital product passports (DPP), Forced Labour (EUFLR), producer responsibility (EPR).

02

Customer demands

Increasingly, tenders require organisations to commit to EUDR (and PPWR) compliance. Traceability is becoming the price of market access.

03

Supply chain disruption

Mapping supply chains, understanding where risks and reliances sit, helps in times when supply chains are disrupted, enabling you to be agile and adapt without impacting the bottom line.

04

Responsible sourcing

Companies have focussed on ethical sourcing for years now. We're seeing the need to know more about product supply chains become standard practice.

05

Business efficiencies

Particularly in groups of businesses, understanding the supplier and product base of sister companies can unlock many economies of scale and efficiencies.

06

Connectivity

Shifting from transactional, annual supplier checks to ongoing communication with suppliers and customers creates win-win partnership opportunities.

SECTION 02

Recent EUDR updates



The EUDR is constantly evolving



Confirmed enforcement from **30 December 2026**.



TRACES is now open for business with new guidance, including grouping of DDS references.



Encouragement to rely on **predictive DDS**: one DDS covering 12 months (if no supply chain changes).



For packaging there is **no 6-month SME extension** to June 2027 because it is in scope of EUTR.



Printed materials (**HS 49**) removed from scope, alongside leather and retreaded rubber.



Reminder: if you don't know the exact plot the wood fibre came from, you can "over-declare" (list all possible sources and species (within reason)).

Changes for UK businesses, recently confirmed by DEFRA

- 🌐 **Northern Ireland** is fully in scope of EUDR from 30 December 2026.
- ↺ **UKTR will move in line with EUDR** in the future.
- # Use of the 'conventional' / 'universal' DDS reference number **99EU9999999999** for goods previously placed on the EU market.

USE CASE 01

Produced during the transition period,
re-imported after
30/12/2026.

USE CASE 02

Produced and
re-imported after
30/12/2026.

What has changed for packaging

☑ IN SCOPE

Packaging as a **standalone product**.

Any **virgin material** must have full traceability.

⊖ OUT OF SCOPE / EXEMPT

Second-hand materials (e.g. re-used pallets).

Apply a specific exemption code to customs declarations (code TBC).

Filled packaging.

100% recycled packaging: must be able to prove 100% recycled.

How does this impact UK companies?

UK companies are **not legally bound** to the EUDR but there are important commercial considerations.

-  No fines can be imposed by the EU. But UK enforcement can enforce compliance with UKTR.
-  UK companies cannot submit to the EU's Information System (TRACES) unless they use a Northern Irish (XI) (or other EU) EORI.
-  You are not legally obliged to pass information to EU customers... **but it is in your commercial interest to do so.** EU customers cannot buy from you unless they can meet EUDR obligations.

What must UK businesses do?

STEP 01

Confirm whether your products are **in scope**.

STEP 02

Confirm your **obligations**. These are largely set by Incoterms and whether you or your customer places goods on the EU market.

Even with no direct obligations, to trade with the EU you will need to:

-  **Collect** EUDR information from suppliers (species, harvest dates, geolocations, legality).
-  **Document** your due diligence procedures in case you are asked to share them.
-  **Share** information with downstream customers. Know what they expect of you.
-  **Conduct due diligence**. Prove no risk of deforestation or illegality.
-  **Manage data** with internal systems or third parties.

Want to learn more?



Interu.io — Resources

Knowledge base and newsletter for industry professionals wanting a deeper dive into key content areas.



LinkedIn — follow Interu

The latest EUDR news and practical tips.



Ask a question

For any EUDR questions, email contact@lov42.com.



Start a free trial

Map supply chains and apply EUDR risk assessments.

Disclaimer: We provide a portal for the transfer of data from third-party sources to individual users. You are responsible for ensuring that your use of the portal, including the data, is sufficient or appropriate for any particular use or circumstances, including taking independent professional advice as necessary. You should always seek independent professional advice to confirm your compliance with applicable law.