



LA RÉFÉRENCE EN MATIÈRE DE BOIS TROPICAL



# RDUE: what changes, what remains

## Navigating between the 2023 text and the 2025 simplifications

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# Summary

**1 The Stable Fundamentals:** What isn't changing in the EUDR.

**2 Key Evolutions by Theme:**

- Redefinition of actors and their obligations.
- The new simplified regime for small producers.
- Due diligence and submission of declarations.
- Traceability and information flow.
- Controls and sanctions.

**3 Summary Table:** All evolutions at a glance.

**4 New Deadlines:** The updated application calendar.

# The intact pillars of regulation

Despite the modifications, the core of the EUDR remains the same.  
Products placed on the EU market or exported must always be:



## Zero Deforestation

Products from land not deforested after the cutoff date of **December 31, 2020**.  
(Source: Regulation (EU) 2023/1115, Article 2, point 13).



## Lawful

Products in compliance with the relevant legislation of the country of production (land tenure rights, environmental protection, third-party rights, labor law, human rights, etc.). (Source: Regulation (EU) 2023/1115, Article 3, point b).



## Covered by a Declaration

Every consignment must be covered by a declaration attesting to its conformity.  
(Source: Regulation (EU) 2023/1115, Article 3, point c).



## Affected Products

The material scope of application (cattle, cocoa, coffee, oil palm, rubber, soy, wood, and derived products listed in Annex I) is maintained.

# The intact pillars of regulation

## Scope of Application: Relevant Products and Cut-off Date

### Section 1: Relevant Commodities (Article 2)

The 7 key commodities and their derived products



Cattle  
(meat, leather...)



Cocoa  
(beans, chocolate...)



Coffee



Oil Palm  
(oil, glycerine...)



Rubber  
(tires, gloves...)



Soya  
(beans, oilcake...)



Wood  
(furniture, paper,  
charcoal...)

*\*The complete list of products (by customs code) is in Annex I of the regulation.*

### Section 2: The Cut-off Date (Article 2)

One non-negotiable reference date



Only products containing commodities produced on land that has not been subject to deforestation or forest degradation **after this date** are authorized.

# Key development #1: New roles

## The EUDR Ecosystem Has Evolved: Mapping the New Actors

The 2025 amendment segments the supply chain into four distinct roles, each with specific obligations. Understanding your position in this ecosystem is the first step toward compliance.



### Production

Land parcel/Establishment.



### Operator

Places the product on the EU market for the first time or exports. Bears the responsibility of due diligence.



### Downstream Operator

Transforms a product already on the market. Lighter obligations.



### Trader

Makes available on the market a product already on the market, without transformation. Traceability obligations.



### Specific Case: Micro or Small Primary Operator

Producer (micro/small enterprise) in a low-risk country who places their own product on the market. Simplified regime.

## Key development #1: New roles

### The Operator: The Pillar of Due Diligence

If you are the first to place a relevant product on the EU market (importer or European producer) or if you export it, you are an **“Operator”**. Your responsibility is total and non-delegable.



#### Due Diligence (DD)

- Collect information (Art. 9), including precise **geolocation** of plots.
- Assess risks of non-compliance (Art. 10).
- Mitigate risks to achieve a 'zero or negligible' level (Art. 11).



#### Due Diligence Statement (DDS)

- Submit a **Due Diligence Statement (DDS)** via the EU information system for each lot/shipment before placing it on the market.
- Assume full legal responsibility for the product's compliance (Art. 4(3)).



#### Traceability

- Communicate the **DDS reference number** to downstream actors (Art. 4(7)).

## Key development #1: New roles

### The Downstream Operator: A New Category, Targeted Responsibilities

The amendment creates the “**Downstream Operator**” category for companies that place on the market or export products manufactured from goods already covered by a DDS. Your obligations are lighter but not non-existent.

**Definition (Art. 2(15 ter)):** Any person who, in the course of a commercial activity, places on the market or exports relevant products manufactured from relevant products which have been the subject of a due diligence statement or a simplified declaration.

<b>Before</b> (Former status of Operator)	<b>After</b> (New status of Downstream Operator)
<ul style="list-style-type: none"><li>• Complete due diligence obligation.</li><li>• Submission of a new DDS.</li></ul>	<ul style="list-style-type: none"><li>• <b>No</b> general due diligence obligation.</li><li>• <b>No</b> DDS submission.</li><li>• Traceability obligation (collect information on suppliers/customers).</li><li>• Duty of vigilance in case of 'substantiated concerns' (for non-SMEs).</li></ul>

**Warning:** if you export the products concerned, you are **not required to provide the due diligence statement (DDS) reference numbers to customs (Article 26(4)).**

# Key development #1: New roles

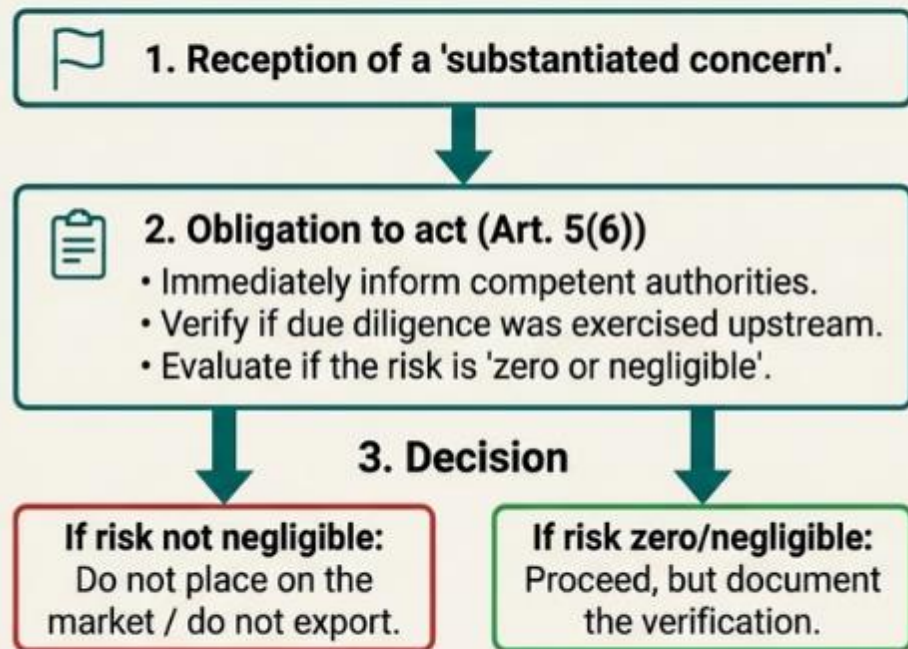
## Focus: The Duty of Vigilance for 'Substantiated Concerns'

[Sans titre]

For non-SME downstream operators and traders, Article 5(6) introduces a reactive obligation. You don't have to search for risks, but **you must act** if you become aware of them.

### What is a 'Substantiated Concern'? (Art. 2(31))

- A duly motivated claim.
- Based on **objective and verifiable** information.
- Concerning non-compliance with the EUDR.
- **Possible Sources:** NGO alerts, credible media reports, information from suppliers, internal audit results, alerts from competent authorities.



**Key Point Box:** (Response to ATIBT 10.2) "This provision de facto creates a 'downstream diligence' obligation." It encourages large downstream companies to maintain robust risk management systems, even without a formal DDS.

## Key development #2: MSPO category


# Key Evolution #2: Relief for 'Micro or Small Primary Operators'


A new category is created to reduce the burden on the smallest producers in "low-risk" countries.  
(Source: Mod. Reg., Art. 1, point 5 - New Art. 4bis).


**Who is concerned?:** (Source: Mod. Reg., Art. 1, point 1b - "15 bis")

- Natural persons, micro or small enterprises.
- Established in a "low-risk" country.
- Who produce and place their products on the market themselves.

**What simplifications?:** (Source: Mod. Reg., New Art. 4bis)

 **No per-consignment DDD:** They submit a single "**Simplified Declaration**" via the information system.

 **Declaration ID:** They receive a **unique ID** to transmit downstream.

 **Simplified Geolocation:** Can replace GPS coordinates with a **clear postal address** of the plot or establishment.



COMPLETE DDD



SIMPLIFIED  
DECLARATION



UNIQUE IDENTIFIER

### Attention (Important Limitations): (Response to ATIBT 7.1 and 13.2)

- This regime **does NOT apply to imports**. Any company importing products, even from a micro-enterprise, is considered a full 'Operator' and must conduct full due diligence.
- The status is based on annual financial thresholds, creating potential legal uncertainty during an operating year.



## Key development #3: DR declaration

# Key Evolution #3: The Rationalized Declaration Process

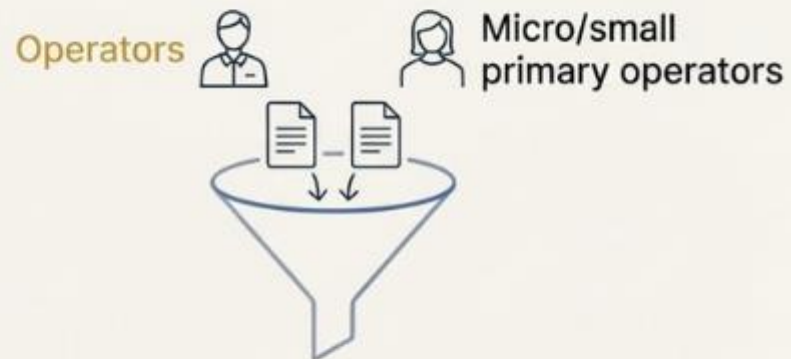
The modification drastically rationalizes the flow of declarations submitted to the EU information system.

### BEFORE: A cascade of declarations



- **Operators AND non-SME Traders** had to submit a DDD for each market placement / export.
- **Consequence:** Millions of potential declarations, creating an enormous system and administrative burden.

### AFTER: Targeted responsibility



- Only **Operators** submit a full DDD.
- **Micro/small primary operators** submit a single **Simplified Declaration**.
-  **Downstream Operators and Traders** submit **NO** declarations.

# Key development #3: DR declaration

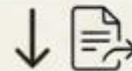
## The Journey of a Declaration Number: Who Must Collect and Keep What?

The circulation of reference numbers is the key to EUDR traceability. The amendment clarifies that the obligation to collect and retain primarily rests on the first link after the operator.

### Step 1: The Operator

Submits a DDS and obtains a **DDS Reference Number**.

**Action:** Must transmit this number to their direct customer (Art. 4(7)).



### Step 2: The First Downstream Operator / Trader

Receives the product from the Operator.

**Action (Art. 5(3)(a)):** Must **collect and keep** the DDS Reference Number for 5 years.



### Step 3: Subsequent Actors (Other Downstream Operators / Traders)

Receive the product from the actor in Step 2.

**Action:** Must **collect and keep** information on their direct supplier (name, address, etc.), but no longer have the formal obligation to collect and keep the initial DDS number.

**Clarification Box:** (Response to ATIBT 4.2) For transformed or mixed products, upstream traceability rests on the first operator. Actors further down the chain ensure "one step up, one step down" traceability. Depending on the situation, voluntarily keeping the DDS numbers can be a good risk management practice.

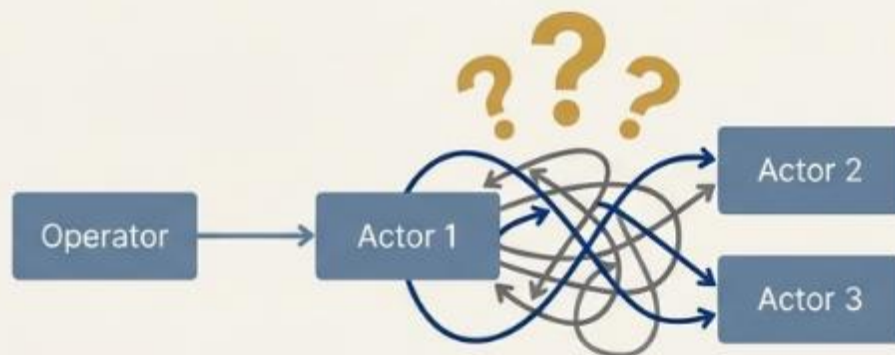
## Key development #4: Traceability

### Key Evolution #4: Traceability & Transmission of Reference Numbers

The obligation to transmit declaration reference numbers is clarified and lightened for downstream actors.

#### BEFORE: A vague and burdensome obligation

- Operators had to communicate “all necessary information” downstream, including DDD reference numbers. (Source: Reg. 2023/1115, Art. 4(7)).
- **Uncertainty** about the scope of the obligation for successive actors, especially in cases of product mixing.



#### AFTER: An obligation limited to the first link

- The **Operator** transmits the reference number (DDD or simplified declaration ID) to their direct client.
- **Only the first 'downstream operator' or 'trader'** is formally required to collect and keep this number. (Source: Mod. Reg., New Art. 5(3)(a)).
- Further downstream actors are no longer legally required to do so, simplifying management.



# Key developments: who does what?

Obligation	Operator	Downstream Operator (non-SME)	Trader (non-SME)	Micro/Small Primary Operator
 <b>Due Diligence</b>	✓ (Complete)	✗ (Except if "substantiated concern")	✗ (Except if "substantiated concern")	✓ (Attestation of diligence)
 <b>Declaration Submission</b>	✓ (DDS)	✗	✗	✓ (Simplified Declaration)
 <b>Collect Declaration No.</b>	N/A	✓ (If 1st buyer from operator)	✓ (If 1st buyer from operator)	N/A
 <b>Active Vigilance</b>	✓ (Intrinsic to DDS)	✓ (If "substantiated concern")	✓ (If "substantiated concern")	✗
 <b>System Registration</b>	✓	✓	✓	✓ (via Simplified Declaration)

# Controls and Sanctions: Differentiated Obligations

The lightening of declaration obligations does not mean an absence of responsibility for downstream actors.

### **BEFORE: Sanctions primarily for Operators**

Controls and sanctions primarily targeted “operators” (including non-SME traders) who were subject to due diligence.

### **AFTER: Shared and proportional responsibilities**

- **Operators** are controlled on their complete DD system (New Art. 18).
- **Downstream Operators** and **Traders** are controlled on their traceability obligations (New Art. 19).
- **Duty of care:** In case of “substantiated concerns”, downstream operators and non-SME traders must verify compliance and cannot place a product on the market if they know it is at risk. (Source: Mod. Reg., New Art. 5(6)).

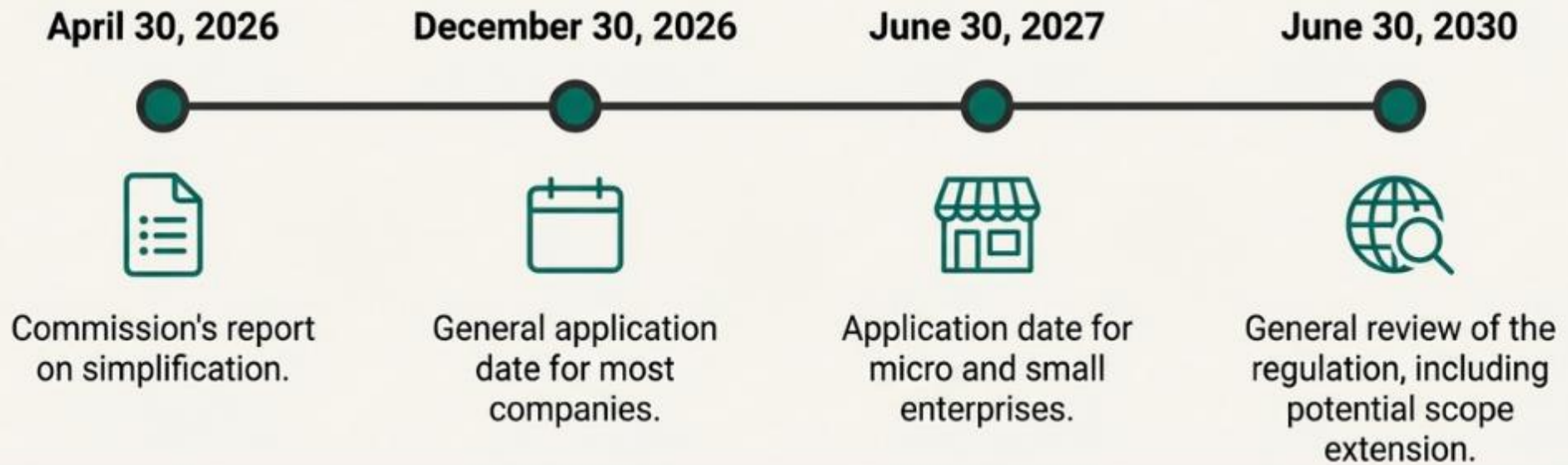
Sanctions (fines up to 4% of turnover, confiscation) apply to **all actors** (operators, downstream operators, traders) in case of failure to meet their respective obligations. (Source: Mod. Reg., Art. 1, point 16).



# New schedule

## Timeline and Next Steps: Key Dates for the EUDR

The 2025 amendment has postponed the application dates, allowing more time for preparation. The regulation remains evolutionary, with reviews planned to adjust its scope and functioning.



## Summary table of changes (1/2)

Thematic	Situation BEFORE (Regulation 2023/1115)	Situation AFTER (Modification 19/12/25)	Impacted Actors
<b>Definition of Actors</b>	2 categories: Operators and Traders. Non-SME traders are considered equivalent to operators.	3 categories: Operators, <b>Downstream Operators</b> (new), Traders. The SME/non-SME distinction remains relevant.	All
<b>Due Diligence (DD) Obligation</b>	Concerns all Operators and non-SME Traders.	Concerns <b>only Operators</b> .	Operators, Downstream Operators, Traders
<b>Declaration Submission</b>	DDD required by Operators and non-SME Traders for each market placement.	DDD by Operators. Single Simplified Declaration by micro/small primary op. <b>No declaration for others.</b>	All

## Summary table of changes (2/2)

Thematic	Situation BEFORE	Situation AFTER	Impacted Actors
Small Producers Regime	No specific regime, except for a longer application delay for SMEs.	Creation of "micro or small primary operators" (low-risk countries) with a simplified regime.	Small producers, their clients
Traceability of DDD Numbers	Downstream transmission obligation, vague and potentially burdensome scope.	Obligation clarified and limited to the first downstream link (downstream operator/trader).	Downstream Operators, Traders
Sanctions	Applicable to Operators and Traders for failure to meet their obligations.	Made explicit for all actors based on their respective obligations.	All
Calendar	Application: Dec 30, 2024 (SMEs: June 30, 2025).	Application postponed to Dec 30, 2026 (SMEs: June 30, 2027).	All

# Key takeaways

1



**The Course is Set:** The 'zero deforestation' objective and the 31/12/2020 cutoff date are unchanged. The fundamentals of compliance remain.

2



**A Simplified Structure:** The new architecture (Operator / Downstream Operator / Trader) concentrates the due diligence burden on the first to place on the market.

3



**Targeted Relief:** Significant simplifications are introduced for micro and small producers in low-risk countries, reducing the administrative burden.

4



**Cascading Responsibility:** Full due diligence is upstream, but traceability and vigilance remain key obligations for all downstream actors.

5



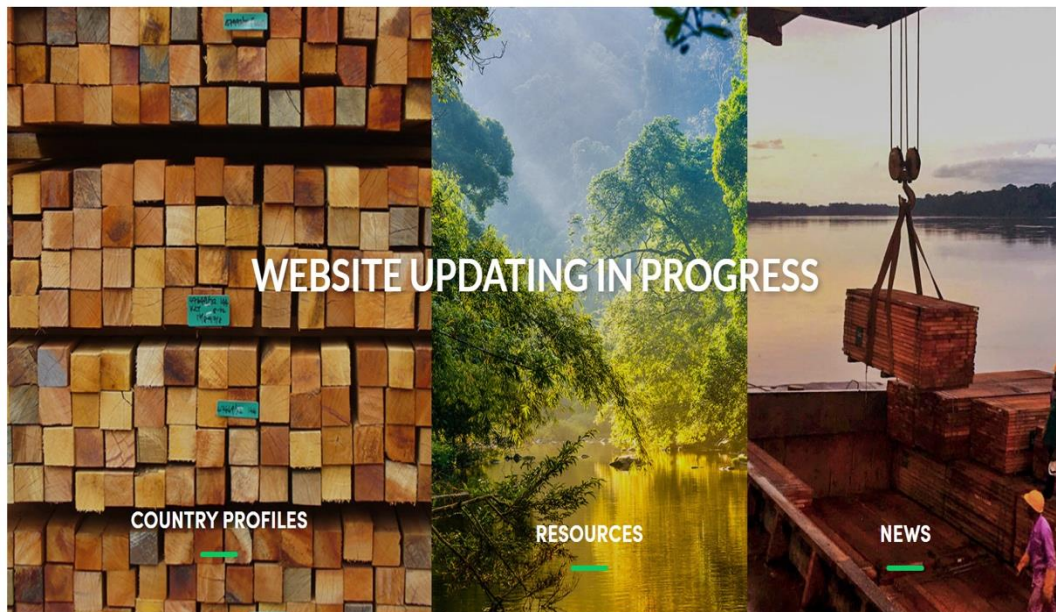
**More Time to Prepare:** The 12-month postponement of the application date provides a crucial delay to adapt systems and processes.

# Timber Trade Portal : due diligence tool



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**TIMBER TRADE PORTAL**  
<https://www.timbertradeportal.com/fr>

The **Timber Trade Portal** is a website that provides reliable information on **timber legality, traceability, and international trade rules.**

With the introduction of the **EU Regulation on Deforestation (EUDR)** and new **CITES decisions**, it needs to be updated in order to remain useful for companies and authorities.



atibt.org



# Timber Trade Portal : due diligence tool



TIMBER TRADE  
PORTAL

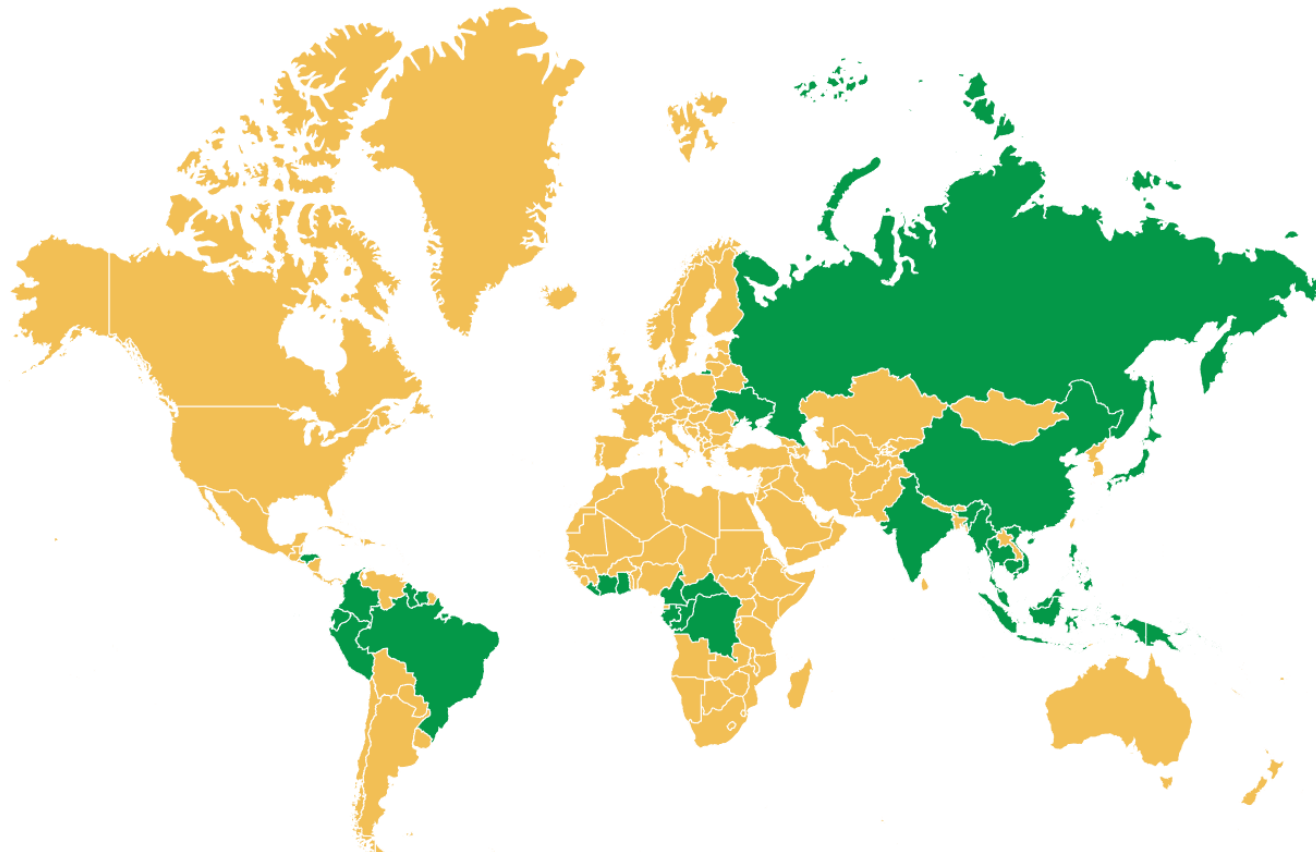
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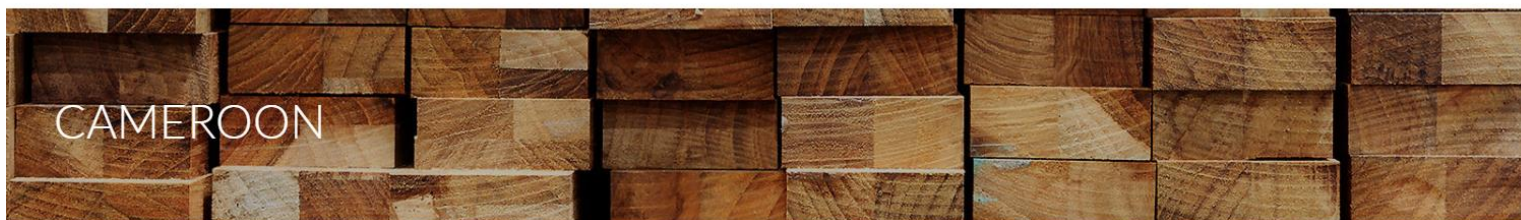
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COUNTRY CONTEXT

TIMBER SECTOR

LEGAL FRAMEWORK

KEY DOCUMENTS

OTHER ASPECTS

SOURCES & CONTACTS

## FOREST RESOURCES AND CONTEXT OF CAMEROON

According to the Ministry of Forests and Wildlife (2018), Cameroon has about 22 million hectares of forests, or nearly 46% of the total country area. 26 000 hectares (0.1% of the forest area) is categorised as planted forest.



Land surface

**47.3**  
million ha

Forest cover

**20.2**  
million ha

Production forest

**15.7**  
million ha

Forest ownership

**100**  
% publicly



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