

# 5 Myths about EUDR and the Facts





# Myth #1:



The EUDR has been postponed by at least one year,  
following a statement by EU Commissioners in September.



## Fact:

The European Commission has proposed that the EUDR will take effect on **December 30th, 2025** for all companies with more than **50 employees, €8 million in revenue**, and/or **€4 million in balance sheet total**. Smaller companies have been granted an extended preparation period.





# Myth #2:



I am not an importing company, as I source all my products from within the EU. Therefore, the EUDR no longer applies to me, and I am not required to submit my own Due Diligence Statement (DDS).



## Fact:

Although downstream operators are **not legally required** to submit a DDS, the EUDR still **mandates full traceability for all companies** operating downstream in the supply chain. That means, these companies are still **collecting, validating, consolidating and transmitting DDS information** in order to remain compliant with the regulation.





# Myth #3:



The EU no longer permits aggregation (bundling of reference numbers) for downstream operators. As a result, I now need full batch-level traceability, which means collecting hundreds of reference numbers from my suppliers and forwarding them to my clients.



## Fact:

Downstream operators can still **use our platform's aggregator** to consolidate DDS numbers and **share them efficiently**, but sending an additional DDS to TRACES is **no longer necessary** and could create confusion.

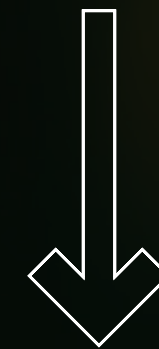




# Myth #4:



I qualify as a small or micro enterprise under EU thresholds. This means I am only required to comply with the regulation by December 30th, 2026, and have no obligations until that date.



## Fact:

From a **legal standpoint**, the **extended deadline applies** to small and micro enterprises. However, **in practice**, we observe that larger downstream companies are already **requesting DDS information** from their **SME suppliers**. As a result, many SMEs are effectively obliged by their clients to provide EUDR data **before** their **official legal deadline**.





# Myth #5:



As the EU is proposing a grace period of six months (until June 30th 2026), I still have a lot of time to become EUDR compliant.



## Fact:

The proposed **grace period** from the European Commission stipulates that **no penalty payments** will be enforced during this time. However, **audits** by authorities may still **occur**. Moreover, upstream operators will already need DDS reference numbers for **customs clearance**, while downstream companies will require them to **respond to client requests**.





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