

STATEMENT

Compliance to EU Deforestation Regulation in the EU printing industry

September 2024

[this statement is applicable to printers and customers in the EU]

The EU Regulation on deforestation-free products (EU/2023/1115) – EUDR - will impact the full print value chain as the scope covers paper/board and printed products. The printing sector in Europe is actively preparing for the entry into application of the Regulation. Most requirements of the EUDR will take effect as from **30 December 2024**.

Intergraf is addressing the most frequently asked questions from customers of printing companies:

Can printers provide information to their customers prior to 30 December 2024?

No, prior to 30 December 2024, there is no legal obligation for any company to provide information, including geolocation data. Even the initial operator harvesting the wood does not have the legal obligation to collect and provide geolocation data. Thus, this information is not available to printers prior to 30 December 2024. Only information made available by suppliers on a voluntary basis can be transmitted by printers.

The compliance exercise is challenging for all companies along our value chain and in all value chains of products and commodities in scope of EUDR. Indeed, the tools and legal clarifications are not yet available from the European Commission, which prevents companies from fully achieving compliance. As a result, many countries and industries, including ours, are advocating for a postponement of the entry into force of the Regulation.

Will printers provide geolocation data to their customers as from 30 December 2024?

No, the EUDR does not foresee that all detailed information on the sourcing of the wood, including geolocation data, is made automatically available to the full value chain. The Information System which will gather all Due Diligence Statements as required under EUDR will not be designed to automatically provide full transparency to all users. It will be designed for users to only access the information from its direct supplier but not the information from actors further up in the supply chain¹. This implies that detailed information on the sourcing of the material may never be visible or accessible to companies down the value chain, including printers and print buyers. This information will in any case not be necessary for the print buyers' own Due Diligence Statement.

¹ Note that the Information System may provide the possibility for each actor to voluntarily allow the geolocation data to be visible when referenced in another DDS.

Where will the information on the sourcing of the raw material be stored?

The information on the sourcing of the raw material, including geolocation data, will be available in the EU Information System (also called TRACES). The system is still under development and will only be accessible to companies shortly before the entry into force of the Regulation. The system is designed to allow national competent authorities to access the information all along the value chain for the enforcement of the Regulation. All companies along the value chain will be able to access the information from their direct supplier in the Information System via the Due Diligence Statement reference number.

What information can be expected from printers as from 30 December 2024?

If the printer is an **SME**², it can provide on request its customer with the Due Diligence Statement reference number(s) of the paper/board used to produce the printed products³. If the printer is a **non-SME**, it will generate a Due Diligence Statement in the EU Information System for the printed products and will provide its customer with the related Due Diligence Statement reference number. Moreover, it shall provide customers with general information necessary to demonstrate due diligence.

When trading within the EU, the printer or its customer is not expected to collect, input, check or access geolocation data in the EU Information System. This information is not available to printers as it affects suppliers further up the value chain.

Are transition periods applicable to printers and their customers?

Yes, transition periods will be applicable to the print value chain.

First, the EUDR will only be applicable to **small and micro-companies** as of **30 June 2025** meaning that any company, having as supplier a small and micro-company, will not be expected to be compliant before its supplier. If the printer is a small or micro-company, its customer only needs to prove to authorities the status of its supplier.

Additionally, wood/pulp/paper/board produced before 29 June 2023 is still covered by the **EU Timber Regulation** (EU/995/2010) - EUTR - until 31 December 2027.

Finally, if wood or related semi-finished product is placed on the market **between 29 June 2023 and 30 December 2024**, companies purchasing or producing derived products (paper/board/printed products) will only have the obligation to provide evidence that the material used to produce the printed products was placed on the market during the transition period.

[Intergraf](#) is the voice of the European printing industry in Brussels. We represent 22 national printing federations in 21 countries in Europe. The printing industry provides jobs to 600,000 Europeans active in over 100,000 companies and generates a turnover of approximately € 80 billion. The industry throughout Europe consists mainly of small companies, as 95% of them employ fewer than 20 persons.

² See detailed definition in Directive 2013/34/EU

³ This is applicable if the printer is considered as an operator under EUDR.