EUDR:
What fashion and footwear brands should be doing now



At a glance

The EU Deforestation Regulation (EUDR) introduces requirements for certain commodities and products placed on, made available on or exported from the EU market. Its purpose is to reduce the EU's contribution to global deforestation, forest degradation, greenhouse gas emissions and biodiversity loss.

For fashion, footwear and retail brands, the first step is not to assume that every paper, wood or rubber item is automatically in scope. Applicability depends on the product and its classification under Annex I of the Regulation. Where a product is in scope, businesses may need stronger evidence of origin, legality, traceability and due diligence throughout the supply chain.

Key points

- EUDR covers seven commodities: cattle, cocoa, coffee, oil palm, rubber, soya and wood, together with specified derived products listed in Annex I.
- Relevant products must be deforestation-free, produced in accordance with relevant legislation in the country of production and covered by the required due diligence information.
- The deforestation cut-off date is 31 December 2020.
- The current application date for large and medium operators and traders is 30 December 2026. The later date 30 Jun 2027 for qualifying micro and small businesses should be checked against the business's role, size and commodity sector.
- Product scope should be confirmed using the applicable CN/HS code rather than material description alone.
- Businesses should prepare now by mapping applicable products, suppliers, evidence and responsibilities.







What is EUDR?

Regulation (EU) 2023/1115 entered into force on 29 June 2023. It is designed to ensure that relevant products linked to the EU market do not contribute to recent deforestation or forest degradation.

The Regulation places obligations on operators and traders. The exact responsibility depends on factors including where a business sits in the supply chain, whether it first places or exports a relevant product, business size and the applicable product classification.

Who and what may be affected?

EUDR can affect businesses that place relevant products on the EU market, make them available on the EU market or export them from the EU. Non-EU businesses may also be affected through their EU customers and supply chains.

Potential relevance for fashion and retail

- Paper and paperboard products
- Paper-based packaging components
- Printed paper products and hangtags
- Wood-based articles
- Rubber products or components
- Other products derived from the seven regulated commodities

Inclusion cannot be decided from the material name alone. Brands should confirm whether the finished item is listed in Annex I under the relevant CN/HS code and consider any applicable exclusions or treatment of packaging used with another product. Packaging sold as a standalone product is covered by the Regulation and all applicable legal requirements apply. However, packaging used exclusively to support, protect, or carry another product is not covered by the Regulation. This exclusion applies regardless of the HS code under which the packaging is classified. The key factor is whether the packaging is classified together with the product it contains, rather than sold separately on the market.

Three conditions for relevant products

- Deforestation-free: the relevant commodity was produced on land that has not been subject to deforestation after 31 December 2020.
- Legally produced: production complied with the relevant legislation of the country of production.
- Supported by the required compliance information: where applicable, the product is covered by due diligence information and an appropriate due diligence statement or reference.

What information may be needed?

- Product description, trade name and quantity
- Relevant CN/HS code
- Country of production and, where relevant, region
- Geolocation of the plots of land where the relevant commodity was produced
- Date or time range of production
- Supplier and customer details
- Evidence that the product is deforestation-free and legally produced
- Risk assessment and, where necessary, risk mitigation records
- Due diligence statement information or reference numbers, where applicable



What brands should be doing now

1. Establish scope

Build a list of products and materials that may contain or be made from regulated commodities. Confirm the relevant CN/HS codes and identify which items are included in Annex I.



2. Map roles and responsibilities

Clarify which legal entity acts as operator, trader, importer or exporter for each relevant flow. Record who is expected to conduct due diligence, submit information and retain evidence.

3. Engage suppliers

Explain the data and documents that may be required. Identify gaps in origin, geolocation, production timing, legality and chain-of-custody information.



4. Design the evidence process

Create a consistent process to collect, validate, store and retrieve product and supplier evidence. Define escalation steps for missing, inconsistent or higher-risk information.

5. Prepare for due diligence

Where the obligation applies, businesses should be able to assess risk, record any mitigation activity and provide the required due diligence information before the relevant product is placed on or exported from the EU market.



6. Test the process

Run a pilot using a small number of products and suppliers. Test whether evidence can be traced from the finished item back to the source data and whether the correct reference information can travel with the shipment or transaction.

The role of certification

Third-party certification can contribute useful evidence and help support supplier engagement, chain-of-custody information and risk assessment. It should sit within the due diligence process rather than be presented as a substitute for EUDR compliance.



How Weavabel is preparing

Weavabel has implemented an EUDR compliance programme and established internal processes to collect, validate and maintain required due diligence information. Our approach is focused on responsible sourcing, supply chain transparency and practical support for customers.

Powered by osapiens

Weavabel partners with osapiens to manage EUDR due diligence data and support compliance automation, supplier collaboration, traceability and geolocation data, centralised data management, dashboards and audit-ready reporting.

osapiens

DDS reference information

From January 2027, Weavabel plans to provide EUDR due diligence statement (DDS) reference numbers for applicable shipments entering or moving within the European Union via Weavabel Portugal. Shipments outside the scope of EUDR will not require or include a DDS reference number.

How Weavabel can support customers

- Help identify potentially relevant products and material categories
- Provide applicable product and supply chain documentation
- Support supplier data collection and collaboration
- Improve traceability and visibility for relevant products
- Provide DDS reference information for applicable Weavabel Portugal shipments when available
- Share practical updates as EUDR guidance and implementation develop

Preparing for EUDR is about building reliable product data, supplier evidence and traceability into day-to-day operations. Speak to Weavabel about your trims and packaging requirements, the information available for relevant products and how our compliance programme can support your readiness.

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Get in touch to discuss your packaging requirements and EUDR readiness.

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