

5 May 2026

Commission publishes EUDR Simplification Package

Yesterday, the European Commission (Commission) published its long-awaited [package](#) to further simplify the EU Deforestation Regulation (EUDR). This is expected to be the last simplification package to the EUDR, which has already been the subject of two legislative postponements and targeted amendments, before it starts to apply on 30 December 2026. In this client alert, we provide an overview of what is included, and, perhaps more crucially, what is not included, in the simplification package.

What is included in the Simplification Package

The Commission's aim with this simplification package is to increase stability and predictability for businesses and thereby facilitate implementation of the EUDR. To this end, the Commission has proposed the following measures:

- **Delegated regulation to amend the product scope of the EUDR:** the Commission [proposed](#) a delegated regulation to amend Annex I to the EUDR, i.e. the list of relevant products subject to the EUDR. This includes both the addition and removal of certain products. On the one hand, to decrease the risk of circumvention of the EUDR resulting from fragmented approaches to certain sectors, the Commission proposes to add a number of products such as soluble coffee (CN code 2101 11 00) and additional palm oil derivatives which form part of the oleochemicals supply chain. On the other hand, the Commission proposes, notably, to exclude cattle hides and leather (CN codes ex 4101, ex 4104 and ex 4107) from the scope of the EUDR due to EU operators having little leverage to demand the necessary information from suppliers. Moreover, because of the comparatively limited impact on deforestation and forest degradation of retreaded tyres, the Commission proposes to limit the EUDR's application to exclusively the new rubber tread of the retreaded tyres. In addition, building upon a draft delegated act [published](#) in 2025, but which was not adopted, the Commission proposes a number of clarifications regarding the application of the EUDR to waste and second hand products, samples, packaging materials, marketing materials and items of correspondence, which would be largely excluded from the scope of the EUDR.
- **Implementing act to improve the EUDR Information System:** to reflect the new roles and functions following the previous targeted amendments to the EUDR and increase user friendliness, the Commission plans to adopt a new implementing act on the EUDR Information System and make updates to the EUDR Information System itself. The main developments are expected to be the introduction of a simplified declaration form for micro and small primary operators, updated specifications for the automated application interfaces, and a contingency plan for unplanned unavailability. In addition, following stakeholder requests, the Commission plans to keep the feature allowing users to consolidate multiple Due Diligence Statements (DDS), but this will be restricted to own submissions by upstream operators so as not to risk overloading the Information System. Furthermore,

the Commission plans to work with Member States to allow certain information contained in national databases to be auto-filled in the Information System. The draft implementing act is not yet publicly available.

- **Further EUDR guidance:** in light of over 400 questions from stakeholders, the Commission has published an updated [Guidance Document](#), updated [Frequently Asked Questions](#), and an updated [supply chain infographic](#). The Commission has also updated its EUDR [website](#). Most of the updates reflect the previously made targeted amendments to the EUDR, especially concerning the new obligations on micro and small primary operators, downstream operators and traders. Notably, the guidance also contains clarifications

of how the EUDR applies in e-commerce situations as well as a recognition that AI-based tools can be useful in supporting due diligence efforts.

- **Additional trade facilitation tools:** to facilitate compliance and legality assessment, the Commission plans to establish two repositories listing (i) relevant legislation of the country of production, and (ii) certifications schemes applicable to EUDR-relevant commodities. The two repositories will be hosted on dedicated websites and will include information provided by third countries and owners of relevant certification schemes.

What is not included in the Simplification Package

Despite much discussion and pressure from EU trading partners, including the United States, the Commission has not proposed changing the country benchmarking system to include a so-called “no-risk” category of countries. The idea was to create a category of countries which would benefit from further simplifications compared to the current “low-risk” category, such as exemptions from requirements to conduct due diligence and submit a DDS. Such suggestions have been controversial, notably due to challenges they would pose under World Trade Organisation (WTO) rules and the EU’s Free Trade Agreements. Adopting such a change would require the Commission to propose a legislative amendment to the text of the EUDR which would then need to be approved by the European Parliament and Council of the EU under the ordinary legislative procedure. For these reasons, the Commission has ultimately decided not to propose those changes. Because the Commission has sole power of legislative proposal, neither the European Parliament, nor the Council of the EU can propose the re-opening of the EUDR to introduce the “no-risk” category.

Next steps

Unlike the Guidance and the FAQ documents which are immediately applicable, the draft delegated act and implementing act require additional steps to apply. For the delegated regulation amending the EUDR product scope, the Commission has opened a [public consultation](#) running until 1 June 2026. It must also consult experts designated by each Member State before adopting the delegated act. Once adopted by the Commission, the delegated act will only enter into force if no objection has been raised by the European Parliament or the Council of the EU. Similarly, the implementing act can only be adopted following the approval (or in certain limited cases, no opinion) of a committee of representatives of the EU Member States. The Commission confirmed that it will now submit the draft implementing act to EU Member States (also known as the comitology procedure).

In most cases, implementing and delegated acts are adopted without much opposition. However, we expect that the list of goods subject to the EUDR is likely to cause further debate. Moreover, it is possible for the adoption of the delegated or implementing act to be caught up in wider controversy regarding the Commission’s decision not to reopen the legal text of the EUDR.

Lawyers to contact



Joanna Redelbach

Counsel

jredelbach@vbb.com



Sophie Sundaram

Associate

ssundaram@vbb.com

Brussels

Glaverbel Building
Chaussée de La Hulpe 166
B-1170 Brussels
Belgium

+32 (0)2 647 73 50

Geneva

2 Chemin des Mines
CH-1202
Geneva
Switzerland

+41 (0)22 320 90 20

London

Holborn Gate
330 High Holborn
London, WC1V 7QH
United Kingdom

+44 (0)20 7406 1471



www.vbb.com

Van Bael & Bellis (VBB) means Van Bael & Bellis SRL / BV and/or affiliated undertakings. Van Bael & Bellis SRL / BV is a private limited company registered in Belgium with registered number 0428.460.282. It is a law firm partnership. All its partners and other lawyers are either members of the Brussels Bar or are members of foreign (non-Brussels) bars. Van Bael & Bellis (London) LLP is a limited liability partnership registered in England and Wales with registered number OC431476. It is a law firm authorised and regulated by the Solicitors Regulation Authority. A list of the names of the members of Van Bael & Bellis (London) LLP and their professional qualifications is open to inspection at its registered office, Holborn Gate, 330 High Holborn, WC1V 7QH and such persons are either solicitors or registered European lawyers. This communication is for general information purposes only and is not intended to provide legal advice. Please get in touch if you have any questions on any issues raised in it. Links to third party websites in this communication are not monitored or maintained by VBB. VBB does not endorse, verify or warrant the accuracy of the information in these websites and accepts no liability for any damage or loss you may suffer in connection with accessing them or using third party products or services.