Reply template for EUDR customer requests

Pages 1 and 2: Worksheet (delete before sending)

Note (delete before sending): *Working template by Polygon One. Not legal advice and not an official form; the Regulation sets no format for replies to customers. Legal status: Regulation (EU) 2023/1115 as amended by Regulation (EU) 2025/2650, consolidated version of 18 September 2026; Commission guidelines C/2026/3896; Commission FAQ version 5, revised 21 August 2026. Check before sending whether the legal position has changed.*

How to use it: answer the three questions for the goods your customer is asking about. Then use only the building blocks that match your ticks, and delete the others together with all grey notes. Also delete the headings of the building blocks and this worksheet, that is pages 1 and 2. If you have different roles for different goods, fill in the worksheet per product group and write building block B0 for each group.

Question 1: What is your role for the goods in question?

Goods: [item, CN code]

- ☐ **Operator.** We import the goods or produce them in the EU (Article 2(15)). Micro or small primary operators with a declaration identifier belong here.
- ☐ **Downstream operator.** We make the goods from products bought in the EU, and they have a different CN code (Article 2(15b)).
- ☐ **Trader.** We resell the goods unchanged (Article 2(17)).
- ☐ **Supplier outside the EU.** Our customer imports the goods. The Regulation places no obligation on us, but the customer needs the information under Article 9(1) from us. Building blocks B0 to B9 do not fit this case. What the importer needs is set out at polygon-one.com/en/eudr-customer-request-supplier under “When there is no number”.

Question 2: Are you an SME?

- ☐ **Yes.** We exceed at most one of the three limits: EUR 25 million balance sheet total, EUR 50 million net turnover, 250 employees (Article 2(30); per legal entity, Commission FAQ 3.10).
- ☐ **No.** As a downstream operator or trader we must be registered in the information system (Article 5(2)).

Question 3: What has your customer asked for?

- ☐ A1 Reference and verification number for each delivery
- ☐ A2 A copy of the due diligence statement, or a statement for the customer
- ☐ A3 Geolocation of the plots
- ☐ A4 Attestation or confirmation of compliance
- ☐ A5 Supplier declaration or self-declaration (customer’s form)
- ☐ A6 Questionnaire on risk, origin and legality
- ☐ A7 Contract clauses (liability, indemnity, audit rights, cooperation)

Short table: what you owe

O owed · V voluntary · N not owed · C not owed, but a condition for your customer

Request	Operator	Downstream, non-SME	Downstream, SME	Trader	Outside the EU
A1 Reference number, verification number	O reference number, V verification number	N, V	N, V	N, V	N
A2 Copy, own statement	N, V copy	N, not possible	N, not possible	N, not possible	N, C information under Art. 9
A3 Geodata	N, V	N, V with consent	N, V with consent	N, V with consent	C
A4 Attestation, confirmation	N, reply with reference number	N, reply with role and details	N, reply with role and details	N, reply with role and details	N, C evidence
A5 Supplier declaration	V role, O informing	V role, O informing	V role, O informing	V role, O informing	N
A6 Risk questionnaire	N, V country of production	N	N	N	C
A7 Contract clauses	N, matter of contract	N, matter of contract	N, matter of contract	N, matter of contract	N, matter of contract

In every column within the EU, your customer also needs your company details (Article 5(3)), and you inform the authority and the downstream operators and traders you supplied without delay if there are signs of non-compliance (Article 4(5), Article 5(5)).

Which building blocks you need

Tick	Building block
always	B0 Role and size, B8 Informing
A1, operator	B1 Reference number
A1, downstream or trader	B1b No number owed
A2	B2 Copy or own statement
A3	B3 Geodata
A4	B4 Request for an attestation or confirmation
A5	B5 Customer’s form
A6	B6 Questionnaire on risk and legality
A7	B7 Contract clauses
no number exists	B9 a to e
operator with several deliveries	Annex: list of deliveries

Letter

[Your company]
[Street, number]
[Postcode, town]

[Customer]
[Contact person]
[Street, number]
[Postcode, town]

[Place], [date]

Your reference: [ ] · Our reference: [ ]

Your request concerning Regulation (EU) 2023/1115 (EUDR) of [date]

Dear [name],

Thank you for your request concerning the goods [item, CN code] we supply to you. Below you will find the information that Regulation (EU) 2023/1115 sets out for our role.

B0 Role and size

For the goods we supply, [item, CN code], we are [the operator, because we import them / the operator, because we produce them in the EU] [a downstream operator, because we make them from products bought in the EU] [a trader, because we resell them unchanged] within the meaning of the Regulation. We are [an SME / not an SME] within the meaning of Article 2(30).

> **Variant, downstream operator or trader that is not an SME:** We are registered in the information system referred to in Article 33 (Article 5(2)).
>
> **Variant, several roles:** For [product group 1] we are [role], for [product group 2] [role]. The information below applies to each group as stated.

> ***Note (delete before sending):*** *The role applies per product and supply relationship, not to the whole company (Commission guidelines, section 2). A new CN code after processing means downstream operator (Commission FAQ 3.1.1). In a group, each legal entity counts on its own (FAQ 3.13).*

B1 Reference number (operators only)

We will give you the reference number of the due diligence statement [for micro or small primary operators: the declaration identifier of the simplified declaration] for each delivery, from [date] on [the invoice / the delivery note] in the line “EUDR reference number”, referring to the item (Article 4(7)).

> **Optional, verification number confidentially:** We will send the associated verification number confidentially to [name, email address]. Please treat it as a security code and do not pass it on.
>
> **Optional, verification number on request:** We will give you the verification number on request if you wish to verify a reference number in the information system.

> ***Note (delete before sending):*** *The reference number is owed only to customers that are first downstream operators or traders, not to consumers or to companies that make products outside the scope from it (Commission FAQ 3.6.1). The form is up to you, for example the invoice or an email (FAQ 3.8). The verification number is voluntary (FAQ 3.6.1); without it the customer cannot check validity (FAQ 7.25). If you process your own imports into another covered product, you do not have to pass on the import number (FAQ 3.8); use B1b instead.*

B1b No number owed (downstream operators and traders)

We do not submit a due diligence statement of our own for these goods; under the Regulation, downstream operators and traders do not do so (Commission FAQ 3.10.1). Reference numbers are given by the operator to its first customer (Article 4(7)); the Regulation does not provide for passing them on any further. For your records under Article 5(3), our company details are:

- Name: [ ]
- Registered trade name or registered trade mark: [ ]
- Postal address: [ ]
- Email address: [ ]
- Website: [ ]

Optional: We will pass on the reference numbers we received from our supplier [on request / for each delivery].

Note (delete before sending): *Passing numbers on is voluntary. All that is required of you is to link the numbers you received to incoming goods and keep them for five years (Commission FAQ 3.4; Article 5(4)); in its answers of 21 May 2026 the BLE confirmed that the first downstream customer does not have to pass the number on. If you pass numbers on voluntarily, make sure they go with the right delivery. On our reading, you should pass on your suppliers' verification numbers only with their consent.*

B2 Copy or own statement

Operators: The Regulation does not provide for a copy of our due diligence statement to be sent to customers (Commission FAQ 3.6.1). [Optional: We will provide you with a copy on request.]

Optional, customer that is not an SME: With the reference number and verification number you can view the content of the statement in the information system if you have substantiated concerns.

Downstream operators and traders: We cannot submit a due diligence statement for you. Downstream operators and traders are not obliged to do so, and the information system does not technically allow it (Commission FAQ 3.10.1).

Note (delete before sending): *Providing a copy is voluntary. The PDF version generated by the information system does not contain the geodata (User Guide version 3.0, section 6.2(a)). Only customers that are not SMEs may view the content, and only where they have substantiated concerns (User Guide section 8.2). Any additional documents uploaded are visible in the system to the authority only (FAQ 7.23).*

B3 Geodata

Operators: The Regulation does not provide for geodata to be passed along the supply chain (Commission FAQ 7.15). [Variant, released: We have released the geodata in the information system for viewing by customers that are not SMEs where they have substantiated concerns, with the reference and verification number.] [Variant, confidential: The geodata remain confidential; the competent authorities can see them in any case.]

Downstream operators and traders: We do not hold geolocation data for the plots of production, and the Regulation does not provide for passing them on (Commission FAQ 7.15).

Note (delete before sending): *You set the release with a tick box when submitting the statement (FAQ 3.6; User Guide version 3.0, section 8.2). If you hold an upstream supplier's geodata, on our reading you should pass them on only with that supplier's consent; where they contain the names of producers, data protection law applies.*

B4 Request for an "EUDR certificate" or confirmation

You asked us for [an "EUDR certificate" / a confirmation of EUDR compliance]. For the deliveries concerned, we are providing the information the Regulation sets out for our role: [information from B0 and B1 or B1b].

Optional: In addition, we hold [certificate, number, valid until].

Note (delete before sending): *State the information your role requires, without commenting on the customer's term. Certificates such as FSC or PEFC help with the risk assessment, but they do not replace due diligence (Commission FAQ 5.7; Commission guidelines, section 10).*

B5 Customer's form

We have completed points [numbers] of your form. Points [numbers] concern obligations that the Regulation does not provide for in our role [downstream operators and traders: (Commission guidelines C/2026/3896, section 4(d))] [operators: delete the reference in brackets]; we make no declaration on them.

Note (delete before sending): *Downstream operators and traders do not have to ascertain that due diligence was exercised upstream (guidelines, section 4(d)). A commitment to inform corresponds to building block B8 and is unproblematic. Have any further-reaching commitments reviewed by a lawyer before signing.*

B6 Questionnaire on risk and legality

Operators: [Our risk assessment under Article 10 / Our assessment under Article 13] forms part of our records for the competent authority. Country of production of the goods supplied: [country]. [Not an SME: We will publish our report under Article 12(3) for the first time for the year 2027 at [web address].]

Downstream operators and traders: The Regulation does not provide for a risk assessment of their own by downstream operators and traders (Commission FAQ 3.6.1; Commission guidelines, section 4(d)).

> **Variant, substantiated concerns:** If you have substantiated concerns about a specific delivery, please tell us the delivery and the reason. We will support your verification under Article 5(6).

Note (delete before sending): *Choose the Article 13 variant only if all commodities were produced exclusively in low-risk countries and the assessment of the supply chain for circumvention and mixing has found nothing (Article 13(1); Commission guidelines, section 4(e)). Risk assessments and mitigation decisions are records for the authority (Article 10(4), Article 11(3)). Customers that are not SMEs may ask for further information on a voluntary basis where there are substantiated concerns (FAQ 3.6.2). If the customer's notice contains new information about a risk, inform the authority and the downstream operators and traders you supplied without delay (building block B8; Article 4(5), Article 5(5)). The first report under Article 12(3) covers the year 2027 (FAQ 5.14).*

B7 Contract clauses

We will review your draft on [liability / indemnity / audit rights / cooperation] separately and come back to you. The Regulation does not govern such clauses; under Article 4(3), responsibility for compliance lies with the operator.

Note (delete before sending): *Not legal advice. You owe assistance during checks to the authority (Article 4(6), Article 5(7)), not to the customer. Have clauses reviewed by a lawyer.*

B8 Informing (always)

If we obtain information that a product we supplied may not comply with the requirements of the Regulation, we will inform you and the competent authority without delay (Article [4(5) / 5(5)]).

Note (delete before sending): *The obligation applies to every role in the EU and every size: Article 4(5) for operators, Article 5(5) for downstream operators and traders. It is owed to the authority and to the downstream operators and traders you supplied; the commitment to customers without a role of their own is voluntary. In Germany, the draft act (Bundestag printed paper 21/8278, section 14, not yet passed) provides for fines of up to EUR 50,000 for failing to inform or informing late; against legal persons with a total turnover above EUR 1.25 million, the fine can reach 4 percent of EU-wide total turnover.*

B9 When there is no number

a) Not covered: The goods [CN code] do not fall under Annex I to the Regulation [reason, for example: not listed, used goods, packaging of other goods]; there is no due diligence statement for them.

b) Old stock: The goods were placed on the EU market on [date], before 30 December 2026. Evidence: [customs declaration no. / invoice no. / delivery note no.] (Commission FAQ 9.1, 9.2). [Timber produced before 29 June 2023: under Article 37(2), Regulation (EU) No 995/2010 continues to apply to these goods until the end of 2029.]

c) Deferral: We were already established as a [natural person / micro undertaking / small undertaking] on 31 December 2024 and therefore apply the obligations as an operator from 30 June 2027 (Article 38(3)). There is no reference number for deliveries until then; the invoice serves as evidence of the date of placing on the market.

d) Use by the customer: If you use the goods yourself or process them into products not listed in Annex I, Commission FAQ 3.6.1 does not provide for the reference number to be passed on. Please let us know if you resell the goods as such.

e) Customer outside the EU: [Operators: We state the reference number in the export declaration (Article 26(4)).] [Goods bought in the EU, SME: We export the goods as a downstream operator; the export declaration therefore

carries the code Y188 instead of a reference number (Article 26(4), last sentence, Commission FAQ 5.6.1).] [Goods bought in the EU, not an SME: as before, with the code Y196.]

> ***Note (delete before sending):*** *Customs codes: Y129 for ex codes, Y133 for used goods and waste, Y187 for samples, Y190 for packaging of other goods; for the deferral, Y141 until 29 June 2027. The deferral under Article 38(3) applies only to operators and not to timber and paper covered by the Annex to Regulation (EU) No 995/2010; downstream operators and traders are bound from 30 December 2026. If you bought the goods in the EU, you are a downstream operator when you export them, even if you are otherwise a trader (Commission FAQ 5.6.1). Under the last sentence of Article 26(4), the obligation to state the reference number then does not apply to you; the export declaration carries Y188 (SME) or Y196 (non-SME). For goods you imported yourself and export unchanged, see the article on export and re-import at polygon-one.com/en/eudr-export-re-import-re-export.*

Closing

Your contact for EUDR questions is [name, position, email address, telephone]. When you send us requests in future, please state the delivery or invoice number so that we can match them quickly.

Kind regards

[Name]
[Position]
[Company]

Annex: list of deliveries (operators only)

Invoice or delivery note	Line	Product	CN code	Quantity	Reference number	Verification number
[no.]	[line]	[description]	[code]	[quantity, unit]	[reference number]	[only if sent confidentially]

Note (delete before sending): *Fill in the verification number column only if the annex goes exclusively to the named person. Otherwise delete the column.*