

EUDR status overview

As at 12 October 2026. Everything on one page: dates of application, legal acts with their status, open points and sources. Continuously updated version: polygon-one.com/en/eudr-current-status

Dates of application

DATE	WHO AND WHAT
30 Dec 2026	Large and medium-sized companies and all downstream operators and traders that are not SMEs. In Germany the implementing act is due to enter into force on the same day.
30 June 2027	Micro and small enterprises and natural persons that are operators and were established as such on 31 December 2024. Not for timber covered by the Annex to the EU Timber Regulation.
30 Dec 2027	Products newly added to Annex I: soluble coffee, certain palm oil derivatives, frozen cattle tongues.

Legal acts and status

DOCUMENT	STATUS	WHAT IT MEANS FOR YOU
Reg. (EU) 2023/1115 as amended by Reg. (EU) 2025/2650 (19 Dec 2025)	In force	Binding. Always use the consolidated version; the December 2025 amendments concern roles and the passing on of reference numbers.
Implementing Reg. (EU) 2026/1565 (information system)	In force	Binding. Statements, reference, identification and verification numbers, simplified declarations, API.
Delegated Reg. (EU) 2026/2102 on Annex I, OJ L of 17 Sept 2026	In force since 18 Sept 2026	Binding. New product scope. HS code classifications can be frozen; the additions apply only from 30 Dec 2027.
Guidelines OJ C/2026/3896 (20 July 2026)	Guidance	Not binding, but decisive in practice for the authorities.
Commission FAQ version 5 (4 May 2026)	Guidance	Not binding. Older versions, in particular 1.4, are outdated in several places.
Evaluation report COM(2026) 191 (4 May 2026)	Report	Political assessment with no legal effect.
German implementing act (Entwaldungsfreie-Produkte-VO-DurchführungsG), government bill, Bundestag printed paper 21/8278 (30 Sept 2026)	Before the Bundestag, first reading on 8 Oct 2026, now in the agriculture committee	Competent authorities, checks and penalties in Germany. Planned entry into force 30 Dec 2026.
TARIC working document, revision 1 (23 Sept 2026)	Working document	Codes for the customs declaration, including C716, Y141, C717, C720 and C725, Y188 and Y196.
AVV on the implementing act, Bundesrat paper 577/26 (7 Oct 2026)	Before the Bundesrat	Relief for German primary production, including risk-based checks and recognition of existing land data.

Changes to Annex I made by Delegated Regulation (EU) 2026/2102

DELETED SINCE 18 SEPT 2026	NEW FROM 30 DEC 2027	EXPRESSLY OUT OF SCOPE
Cattle hides, skins and leather; conveyor and transmission belts; other articles of vulcanised rubber; aircraft and motor vehicle seats; soya beans for sowing. Retreaded tyres only as ex 4012 90 30 tyre treads.	Soluble coffee; certain oleochemical palm oil derivatives; frozen cattle tongues; soap containing oil palm.	Waste; used and second-hand products; samples and specimens as well as products for analysis and testing; packaging only if it supports, protects or carries another product; marketing material only if it accompanies a product or is free of charge; bamboo, rattan and similar materials.

Open points

TOPIC	STATUS
German implementing act in the Bundestag	Government bill before the Bundestag since 30 Sept 2026, first reading on 8 Oct 2026, now in the agriculture committee. The Bundesrat and associations are calling for milder penalties; the government rejects most of the Bundesrat's requests. The obligations under the Regulation are unaffected.
French Guiana	Proposal COM(2026) 661 to remove the territory from the scope. Until the Council decides, the Regulation applies there unchanged.
A third postponement	No proposal on EUR-Lex (checked on 12 Oct 2026). The Commission does not consider it appropriate to propose further changes to the basic legal text (report of 4 May 2026).

What to do now

Check scope via the CN code against the new Annex I and freeze the classification. Determine your role per supply relationship. Register in the information system. Obtain and validate geolocation data from suppliers. Run a test with one statement. Inform suppliers early. Mind the lead times: with a delivery time of two to four months, some goods ordered now already fall under the Regulation.

Sources: EUR-Lex and the Official Journal of the EU; Delegated Regulation (EU) 2026/2102, OJ L of 17 Sept 2026; Commission publications of 4 May 2026 and 13 July 2026; guidelines OJ C/2026/3896; Commission FAQ version 5; BMLEH publications of 13 Aug 2026 and 6 Aug 2026; answers of the BLE to the IHK webinar of 21 May 2026; Bundestag printed paper 21/8278; Bundesrat printed paper 438/26 (decision); COM(2026) 661; TARIC working document revision 1 of 23 Sept 2026. HRG Polygon One GmbH, polygon-one.com. Not legal advice.