



EUDR Explained

Clarification regarding EUDR Compliance

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What is EUDR?

European Union Deforestation Regulation

The European Union Deforestation Regulation (EUDR) is a new environmental policy aimed at ensuring that products sold in the EU (including printed books) are not linked to deforestation or forest degradation. This means verifying that the paper used in production originates from responsibly managed forests and meets strict traceability standards. Compliance requires detailed documentation of the paper's source, from forest geolocation to final product, and must be in place by December 31, 2025, for larger organizations.

Friesens is actively working with paper suppliers and developing internal tracking systems to meet these requirements, reinforcing its long-standing commitment to sustainability and FSC® Chain of Custody certification. In this document, we provide some information that we hope will be helpful to you regarding EUDR.

Why was EUDR introduced?

The European Union Deforestation Regulation (EUDR) was introduced in response to alarming global deforestation trends, with over **420 million hectares of forest lost between 1990 and 2020**, primarily due to agricultural expansion. Recognizing the urgency, the EU outlined its forest protection strategy in **2019**, leading to the formal adoption of EUDR in **June 2023**, replacing the previous EU Timber Regulation (EUTR). Although originally set to take effect in **December 2024**, enforcement has been postponed to **December 30, 2025**. For Friesens, this regulation reinforces our long-standing commitment to responsible sourcing and environmental stewardship.



Friesens Perspective

Andrew Fennell

At Friesens, we have long upheld a commitment to environmental responsibility by sourcing paper from responsibly managed forests for the production of trade books and school yearbooks.

As part of this commitment, Friesens has maintained FSC® Chain of Custody (COC) certification since 2004. We continue to participate in the FSC COC certification program and undergo annual audits to ensure compliance with FSC standards, most recently in March 2025, under the FSC-STD-40-004 v3-1 standard.

Friesens is committed to ensuring that our products meet the requirements of the European Union Deforestation Regulation.

In response to the European Union Deforestation Regulation (EUDR), we are actively engaging with our paper suppliers to determine their readiness to provide the data required for compliance by the December 31, 2025 deadline. Supplier responses have varied—from full confidence in meeting the requirements to indications that some may not be ready by year-end.

As of mid-September, we have been advised by 90% of the paper mills from which we buy paper that they expect to be ready and able to provide the required documentation to comply with EUDR by year-end. At Friesens, we are proactively developing an internal tracking method to track EUDR-compliant paper usage. This will support our ability to provide the required information and data to publishers for EUDR submission requirements.

We remain committed to building a robust process for data collection and provision, ensuring that Friesens is fully prepared to comply with EUDR regulations by the end of 2025.



EUDR FAQ's

The European Union Deforestation Regulation (EUDR) is a critical piece of legislation that directly impacts book manufacturers and publishers. This FAQ is designed to provide answers to common questions about EUDR compliance for those in the book industry. Understanding the requirements and deadlines is essential to ensure your shipments are not denied access.

DOES EUDR APPLY TO ME?

The European Union Deforestation Regulation (EUDR) applies to you if you are an “operator” or “trader” who places certain commodities [like wood] (or products made from them) [like **books!**] on the EU market *or* exports them from the EU.

North American book publishers who import books into Europe (to be sold there) must comply with the regulation to get books into the EU. Failure to provide EUDR information/data means shipments will be denied access to the EU market.

WHAT IS THE ENFORCEMENT DEADLINE?

The enforcement deadline depends on the size of your company

Large enterprises: Must be compliant by **December 30, 2025**.

Small and micro-enterprises (SMEs): Have until **June 30, 2026** to comply.

SMEs are defined for the EUDR as companies that fulfil two of the following three criteria:

Less than 50 employees

Annual turnover below €10 million

Balance sheet total below €10 million

WHO IS RESPONSIBLE FOR SUBMITTING EUDR INFORMATION/DATA WHEN IMPORTING BOOKS INTO EUROPE (TO BE SOLD THERE)?

The “operator” or “trader” is responsible for submitting EUDR information/data when importing books into Europe. This means that **the Book Publisher** (the “Operator”) must submit EUDR information/data.



HOW DO YOU SUBMIT EUDR INFORMATION/DATA?

To submit EUDR information/data, you must complete a **Due Diligence Statement (DDS)** through the EUDR Information System, accessible via the **TRACES-NT portal**. This process requires collecting detailed data, including product type, country of origin, and geolocation of production plots, then assessing and mitigating deforestation risks. After submitting the DDS, you will receive a reference number that must be linked to your shipments and provided to your downstream partners as proof of compliance.

WHERE CAN PUBLISHERS GET THIS EUDR INFORMATION?

Book manufacturers (like Friesens) have been connecting with paper mills to determine if and when the paper mills will be able to provide the required EUDR information/data. In most cases, the paper mills have indicated that they will be able to do so by the implementation date (December 30, 2025).

While the exact details are not yet finalized, the process will likely be as follows:

The paper mills will send EUDR information/data to Friesens that pertains to every shipment of paper delivered to Friesens.

Friesens will collect and hold that EUDR information/data.

When a book publisher requires EUDR information/data for a title to enable them to submit a DDS to TRACES-NT, the book publisher will request the relevant EUDR information/data from Friesens (for that title).

Friesens will combine the EUDR information/data for the various components of the book/title (text paper, cover paper, etc.).

Friesens will send the total EUDR information/data “package” to the publisher.

If you know already or anticipate that you will be importing books into Europe to be sold, please let us know! The sooner we are informed, the sooner we can connect with you and provide clarification for you and Friesens.



EUDR vs FSC

Is EUDR different from other sustainability certifications?

At Friesens, we recognize the importance of both regulatory compliance and voluntary certification in promoting sustainable forestry. The **EU Deforestation Regulation (EUDR)**, enforced by the European Union since June 2023, is a mandatory regulation designed to prevent deforestation-linked products—such as wood, cattle, soy, coffee, and cocoa—from entering the EU market. It requires companies to provide detailed due diligence, including geolocation of land plots, risk assessments, and mitigation strategies, with government oversight and penalties for non-compliance. In contrast, the **Forest Stewardship Council (FSC)**, established in 1993, is a voluntary global certification focused primarily on timber and forest products. FSC emphasizes supply chain traceability, annual audits, and third-party verification, with the risk of losing certification for violations. While EUDR is EU-market specific, FSC is globally recognized, and Friesens has proudly maintained FSC certification since 2004—demonstrating our long-standing commitment to responsible sourcing and environmental integrity.



What role do each of us play?

Paper Mills

Since the supply of paper begins with paper mills, who source raw wood fibre and manufacturing the paper, the paper mills need to provide the information and data required for EUDR compliance. Under EUDR, mills must be able to trace the origin of their raw materials and demonstrate that the forests they source from are legally and sustainably managed.

Printers

Printers transform raw materials into finished products. Printers, like Friesens, are connecting with suppliers to ensure that all paper used in books that may be sold in Europe complies with EUDR traceability and due diligence requirements.

Publishers

Publishers who import books into the European Union are ultimately responsible for EUDR compliance. The documentation required to import books into the EU must include Due Diligence Statement (DDS) references and verification numbers (the numbers generated from submitting the information to the TRACES database).



Supplier EUDR Status of Compliance

As of September 15, 2025

Paper Mill	Product/Paper Name	Category	EUDR Ready Status
Billerud	Anthem Plus	Coated text paper	confirmed by mill/supplier
Billerud	Sterling Ultra C1S	Cover/DJ paper	confirmed by mill/supplier
Boise	Boise Offset	Uncoated text paper	not yet confirmed
Ecological Fibers	Rainbow	cover paper and endsheets	confirmed by mill/supplier
Kruger	Krubook	Uncoated text paper	confirmed by mill/supplier
Lecta	Garda	Coated text paper	confirmed by mill/supplier
Moorim	Neostar	Coated text paper	confirmed by mill/supplier
Moorim	Neostar C1S	Cover/DJ paper	confirmed by mill/supplier
Pixelle	Authors Tradebook	Uncoated text paper	confirmed by mill/supplier
Domtar (Resolute)	Alternative Book	Uncoated text paper	confirmed by mill/supplier
Domtar (Resolute)	Resolute Book	Uncoated text paper	confirmed by mill/supplier
Domtar	Husky	Uncoated text paper	confirmed by mill/supplier
Domtar	Cougar	Uncoated text paper	confirmed by mill/supplier
RYAM	Kallima C1S & C2S	Coated cover paper	confirmed by mill/supplier
Sappi	Opus	Coated text paper	will not be ready
Sappi	Flo	Coated text paper	will not be ready
Sappi	Lustercote C1S	Cover/DJ paper	will not be ready
Sustana	Sustana Enviro 100	Uncoated text paper	<u>100% PCW (exempt)</u>
Sustana	Sustana Satin 100	Uncoated text paper	<u>100% PCW (exempt)</u>
Sustana	Sustana Opaque	Uncoated text paper	confirmed by mill/supplier
Sustana	Sustana Endleaf	Endleaf paper	confirmed by mill/supplier
Sylvamo	Williamsburg	Uncoated text paper	confirmed by mill/supplier
Twin Rivers	Frontier Supreme	Uncoated text paper	not yet confirmed
Westrock	Tango C1S & C2S	Coated cover paper	confirmed by mill/supplier