EDITEUR

ONIX for Books

Product Information Message

Application Note: EU Deforestation Regulation and ONIX

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At the end of 2025, the European Union's Deforestation Regulation (EUDR) will come into force [1]. The aim of the Regulation is to limit deforestation, forest degradation and consequent loss of biodiversity, all over the world, by mandating that products sold in or exported from the EU are 'deforestation-free' – ensuring that EU citizens do not contribute further to deforestation and forest degradation [2].

The main driver of forest loss is changes of land use in order to expand agriculture. In particular, the Regulation is concerned with production of cocoa, coffee, palm oil, rubber, soy and wood, plus cattle, and with products derived from these commodities (*eg* chocolate, paper, leather goods). Physical books and other paper-based products fall within this scope.

The emphasis of the Regulation is on traceability and diligent record keeping by all parties in the supply chain. It requires that manufacturers and resellers of the listed commodities, and goods derived from them, ensure that the raw materials are not sourced from areas subject to deforestation, that they keep detailed records, and that they conduct an assessment of the risk that the data supplied to them is incorrect. In the book supply chain, this traceability of raw materials requires a seamless flow of trusted information from forestry companies to paper and board manufacturers, then onwards to printers, to publishers, and to resellers (including retailers). Compliance is required throughout the entire supply chain, and for all the raw materials used in the product.

The Regulation differentiates between 'operators' and 'traders' [3], with traders having a lower level of required due diligence and risk assessment. There is also a differentiation between micro- and small enterprises, and others. The smallest organizations do not themselves have to comply with the implementation requirements of EUDR until mid-2026 – but many will still have to provide data to their larger business partners by the end of 2025 – and the due diligence requirements are simplified.

The oversight process for EUDR builds on that already used for trading of animals and foodstuffs, and requires provenance records for the relevant commodities be uploaded to an EU online portal – Traces NT (henceforth, just Traces). Provenances require GPS coordinates and other data for the plots of land from which the timber used to make the paper and board was harvested, and a legal declaration that the raw materials are 'deforestation-free' and harvested in accordance with applicable local law [4]. The portal records a Due Diligence Statement (DDS), with a reference number. *Without* that reference, the product is excluded from the EU market (and excluded from being exported from the EU).

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[1] Technically, it passed into EU law mid-2023, but the 'implementation date' and the beginning of enforcement is 30 December 2025 (implementation was originally intended to be December 2024, but was subject to a 12-month delay). The period between mid-2023 and the end of 2025 is termed the 'transition period'.

[2] 'Forest degradation' is taken to mean the conversion of primary or naturally-regenerating forests into plantation forests or other wooded (but not naturally-forested) land. 'Deforestation' means conversion into non-wooded land for agriculture. Manufacturers must ensure that the items entering the EU market are not made from raw materials sourced from land that has been deforested or subject to forest degradation since the baseline date of 31st December 2020.

[3] Detailed discussion of the difference between operator and trader is outside the scope of this document, but broadly, operators are organizations primarily responsible for placing a product on the EU market (publishers or importers). Traders are usually small resellers.

[4] Scrutiny of an organization's compliance should be expected both from the national competent authorities and from private entities and activists. Non-compliance can be met with confiscation of the products or sales revenues, exclusion of the product from the EU market, and fines of up to 4% of an organization's in-EU turnover.

EDItEUR's aim is to ensure that ONIX can be used to communicate EUDR-relevant metadata from publishers to their downstream supply-chain partners. That metadata might include DDS document references *or* GPS provenance data – and sometimes might include *both*.

Having said that, it's important to realise that ONIX forms only *part* of the solution. Other methods will need to be found to communicate EUDR-related information from forestry company to papermaker to printer to publisher – parts of the supply chain where ONIX is not used. Not every publisher makes use of ONIX. And for print-on-demand, it will likely be necessary to carry EUDR information at the level of an order for a single copy, perhaps on a dispatch note or electronic invoice.

This application note is concerned primarily with the methods of communicating EUDR-related metadata in ONIX. It does not specify a particular workflow, nor does it consider the wider implications of EUDR for other workflows and business processes, or the responsibilities of operators and traders. [It may be updated to included guidance on those topics later.] But in a broad sense, **a product placed on the EU market [5] (or exported from that EU market) will require either a pre-existing DDS, or the information necessary to create one**. The DDS reference will be required on customs documentation as the goods enter or leave the EU. Without a DDS, the product will be excluded from the market.

Responsibility will fall upon publishers within the EU to register DDSs for their products. For publishers *outside* the EU, responsibility will pass to their local affiliates, sales agents (publisher representatives in ONIX terms), distributors and importers who are responsible for placing the product on the EU market. However, those publishers outside the EU cannot avoid the process entirely, as they will still have to supply the data required for DDS registration to those other parties. And publishers and others must maintain their records so that claims about their due diligence process, provenance of raw materials, production dates, legal compliance *etc* can be substantiated.

My product has a DDS. How can I specify the DDS reference in ONIX?

The Traces portal and the requirements for EUDR work mostly at the 'product level' – that is, a DDS refers to a specific ISBN and to shipments of copies of that ISBN. Registering a DDS within the portal returns a DDS document reference, a verification number (which others can use to inspect details of the DDS), and a UUID (which the DDS registrant can use within the Traces API). If the product has a DDS, all these can be included in an instance of the <ProductFormFeature> composite:

```
<ProductFormFeature>
    <ProductFormFeatureType>50</ProductFormFeatureType>      <!-- product DDS -->
    <ProductFormFeatureValue>24FRXVV3VOS991+0123456789</ProductFormFeatureValue>
                                    <!-- DDS reference + verification number -->
<ProductFormFeatureDescription>67917ed8-3f4b-4ad6-927d-
    dedfe1bd08c8</ProductFormFeatureDescription>                    <!-- UUID -->
</ProductFormFeature>
```

[5] 'Placed on the market', 'made available in the market' have technical definitions in the Regulation, but they can be read more-or-less as 'for sale in the EU'

Code 50 is the most basic of the Product form feature type codes in List 79 used for EUDR metadata. Product form feature value contains the DDS reference number (which is in fact alphanumeric), and this may *optionally* be followed by the verification number (separated by a + sign, and without spaces). Product form feature description may also contain the UUID that the portal supplies when a DDS is registered via the API. It may be included in internal ONIX data transfers, but should probably be omitted in ONIX sent to other organizations.

The DDS that's relevant to a specific product is likely to change over the lifecycle of the product – see below – so provision for post-publication updates to the ONIX product record is important.

My product hasn't got a DDS yet. How can I specify the raw material provenance so that another organization can create a DDS?

DDSs can only be registered by organizations based in the EU (specifically, the organization's EORI [6] must be linked to an EU country, although UK organizations, based outside the EU, may obtain a suitable EORI by applying for a Northern Irish 'XI EORI'). The organization can then register a Traces user identity and access the portal.

In order to create a DDS for a specific ISBN, the Traces portal requires – for each paper, card or board type used in the manufacture of copies of that ISBN – a list of the forest plots that were harvested in order to provide the raw timber and pulp used:

- there may be several different types (brands and grades) of paper, card and board. A pamphlet, Product form code BF, may use only one or two, but even a simple hardcover book may use one paper type for the main book block, a different type for endpapers, board for the cover, paper for covering the boards, jacket paper and a high-quality coated stock for a plate section (an insert) – six types in all. There could be more…
- each paper type may consist of a mix of pulp made from several different tree species
- each species may have been harvested from several different forest locations, and potentially at different times
- ultimately, these *provenance details* need to be sourced from the paper mill and forestry company, though the printer may be able to supply them to the publisher

but:

- if placed on the EU market (or exported from the EU), a reel of paper is a product that requires a DDS in its own right, in exactly the same way as does a book. So if the paper you use already has a DDS of its own, it can be associated with your book DDS, *and this may remove the requirement for full provenance details for that paper type*. In some cases, creating the DDS for the book as a whole might only require a list of the DDSs for the paper used to create the product (in ONIX these are termed 'embodied' or 'associated' DDSs).

If the book – the product as a whole – doesn't have a DDS, and you cannot create one yourself, then ONIX can be used to pass the necessary provenance details to a trading partner, who can then create the DDS for your product. Again, the Product form feature composite is used to carry the data – and for anything other than the simplest products, there are likely to be *many* repeats of the composite. In fact, even a single paper type might need several repeats of <ProductFormFeature>. Here's one:

[6] Economic Operator Registration and Identification number, an identifier for any commercial organization. Some EORIs are EU-based, but non-EU organizations can use EORIs too (for non-EUDR purposes.

```
<ProductFormFeature>
    <ProductFormFeatureType>47</ProductFormFeatureType>       <!-- provenance -->
    <ProductFormFeatureValue>NO Picea abies (Norway Spruce) 202411
        </ProductFormFeatureValue>      <!-- country + species + harvest date -->
    <ProductFormFeatureDescription>48.558981 -58.578193, 48.563800
        -58.568827</ProductFormFeatureDescription>              <!-- GPS data -->
</ProductFormFeature>
```

Note here that we're using code 47 from List 79. This Product form feature type signifies a provenance for some raw material of any component in any part of the product (book block, cover, jacket *etc*). Or if you want to limit code 47 to the raw materials of just the book block, then code 48 can be used to differentiate raw materials of the binding (the cover and jacket) and code 49 can be used for any other part of the product (for example, of the raw materials used to construct a slipcase).

The Product form feature value field in a provenance can be complex, since it contains up to four separate pieces of information, in order:

- the country from which the raw materials were harvested (Norway in the example above – see List 91 for the relevant country codes)
- the scientific name of the species (the 'Latin name', like *Picea abies*) [7]
- the common name of the tree species (in parentheses, like Norway Spruce)
- the date those trees were harvested (in YYYY, YYYYMM or YYYYMMDD format)

In terms of ONIX, only the first of these is mandatory and the others are all optional, but since all four are required to register a DDS, the expectation is that all four are supplied. There must be spaces separating each of the four pieces, and the common name of the tree species must be enclosed in parentheses (without *extra* spaces). For developers of recipient systems, the *ONIX Implementation and Best Practice Guide* [8] includes sample regular expressions that can be used to separate the different parts of the data. For example, the regular expression `(?<=\()\p{L}+(?:\s\p{L}+)*(?=\))` can be used to select just the common name of the tree species from a text string like '`NO Picea abies (Norway Spruce) 202411`'.

Note that although the Traces portal requires a common name, its utility is doubtful without a controlled vocabulary – trees have different common names in different languages, and even within a single language may have multiple common names [9]. And while the harvest date is needed for compliance, this may not be true after 2028. This is because timber harvested prior to mid-2023, and products made from that timber, are exempt from the requirements of EUDR (although such timber is *still* subject to the older EU Timber Regulation or EUTR [10]), and this exemption expires in 2028 [11].

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[7] The requirements for presentation of a scientific name are rigorous. It must be two words, with the first character of the first word capitalized and the remainder lower case. None of the following are correct: *Picea* (this is a genus name); *Picea Abies, PICEA abies,* or *picea abies* (wrong capitalization); Picea abies (in text, scientific names are displayed in italic, but no markup is allowed in <ProductFormFeatureValue>). ONIX allows for hybrid names such as *Picea × lutzii* (a natural hybrid of two species, *Picea glauca* and *Picea sitchensis*, where the name includes a multiplication sign), but it is not yet confirmed whether the Traces portal accepts such hybrid names.

[8] See doi:10.4400/ejtx

[9] A useful database linking scientific species names and common names in several European languages is available from website of the European and Mediterranean Plant Protection Organization (EPPO).

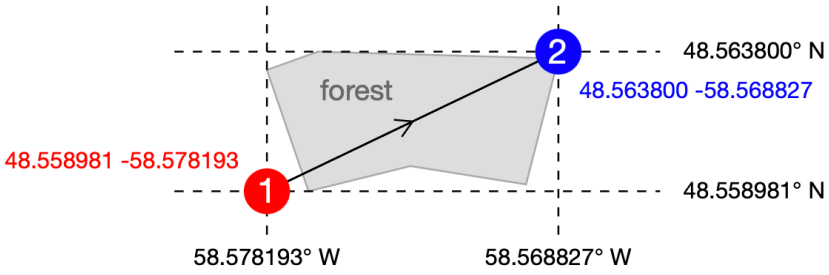
[10] See https://eur-lex.europa.eu/eli/reg/2010/995/oj/eng for the full text of the Regulation.

[11] The EU will conduct an assessment of the Regulation in 2028 and at five-yearly intervals thereafter, and may extend its scope to cover other agricultural crops which are drivers for deforestation, forest degradation or biodiversity loss, for example cotton or maize, or to cover non-forest ecosystems.

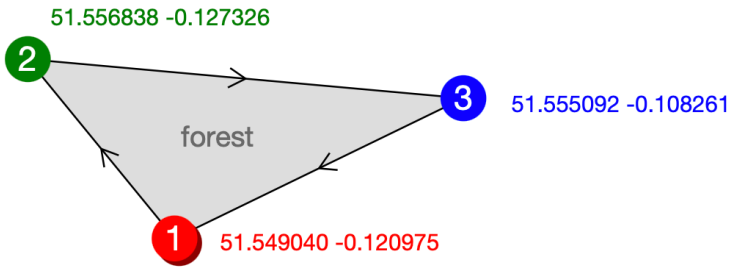
Product form feature description must contain the GPS coordinates of the plot of land from which the raw materials were harvested (*ie* 'where the trees grew'). This plot of land can be defined in one of three ways:

- a single GPS point (consisting of a pair of numbers, space separated, representing a latitude and a longitude) defines the center of a rectangular forest plot up to 200m × 200m in size (*ie* up to 4 hectares in area)
  - example `51.546235, -0.120328`

- two GPS points (consisting of two pairs of numbers, with a comma between the pairs, as in the example above), defining opposite corners of a rectangle bounded by lines of latitude and longitude, within which the forest plot lies [12]. The comma separator is highlighted in yellow
  - example `48.558981 -58.578193, 48.563800 -58.568827`



  - note there is an inherent risk where the forest boundaries do not fill the entire rectangle, in that any deforestation inside the rectangle but outside the forest may make your product non-compliant. A similar risk may attach to a single point plot, in that the area of forest may be much less than the full 4Ha. If this is an issue, a very small polygon can be used instead
- three or more GPS points (consisting of multiple pairs of numbers) forming a simple polygon bounding the forest plot
  - example (in this case a triangle, outlined by four pairs of numbers) `51.549040 -0.120975, 51.556838 -0.127326, 51.555092 -0.108261, 51.549040 -0.120975`



[12] Strictly not quite a rectangle, since lines of longitude converge towards the poles of the globe.

  - as a matter of best practice, the polygon is drawn clockwise and 'closed' by repeating the first point at the end of the list of points
- each GPS coordinate has a suggested *precision* of 6 decimal places, which implies accuracy to the nearest 10cm or so, at least in low latitudes – though it is unlikely this level of accuracy will ever truly be required. EU documentation suggests that GPS data collected via mobile phone is sufficiently accurate
- finally, a set of single points, a set of rectangles or a set of polygons can be assembled into a list, with the forest plots in the list separated by semi-colons (highlighted in pale blue below). You cannot mix single points, rectangles and polygons in a single list, and of course, the details of country, species names and date in Product form feature value must apply to all the plots in the list. A list may contain up to around 100 points in total, without exceeding the suggested maximum length of the data field, and best practice is to ensure each individual polygon in a polygon list is 'closed'
  - example (a list of two single points) `51.544708 0.061076; 51.556838 -0.127326`
  - example (a list of two polygons, the first a triangle in green and the second a square in blue) `51.549040 -0.120975, 51.556838 -0.127326, 51.555092 -0.108261, 51.549040 -0.120975; 51.515333 -0.117380, 51.516582 -0.118347, 51.517177 -0.115544, 51.516026 -0.114760, 51.515333 -0.117380`

There are a few restrictions on the GPS coordinates, and a couple of best practice points. Latitude (the first number in each pair) can vary between 90 and –90, and negative numbers indicate points south of the equator. Longitude (the second number) varies between 180 and –179.999999, with negative numbers indicating points west of the Prime (Greenwich) meridian. A single plot of land (and all the plots in a list) must lie entirely within a single country, and the outline of a polygon cannot cross itself – the polygon cannot contain holes – or the 180° line of longitude.

It is best practice with pairs of GPS points defining rectangles to list the points in south-west to north-east order. With the points outlining a polygon, it is best practice to list them clockwise, as well as ensuring the outline is 'closed'.

The Traces portal also requires the area of a plot, in hectares. For a polygon, this can be calculated using Gauss's area formula (the 'shoelace formula') [13], with an additional adjustment based on latitude [14]. Most GIS software libraries also include a suitable area( ) function, and this is likely to be slightly more accurate that Gauss's formula for very large forests, as it will take better account of the curvature of the earth.

[13] Some versions of Gauss's formula might produce a negative area, because the points around the polygon are listed clockwise, in which case take the absolute value.

[14] You need to convert degrees used in GPS coordinates to Cartesian coordinates in metres to calculate the area using Gauss's formula, and this conversion depends on latitude. For north-south distances at the equator, 1° of latitude is roughly 110,574m, increasing to about 110,852m at sub-tropical latitudes (30° N or S), 111,412m at boreal latitudes (60° N or S) and 111,694m at the poles. For east-west distances, 1° of longitude is about 111,320m at the equator, reducing to 96,486m at 30° N or S, 55,800m at 60° N or S, and zero at the poles. These distances are based on the WGS84 geodetic model used by the GPS system. A more complete conversion table is given in EDItEUR's *ONIX Implementation and Best Practice Guide* (doi:10.4400/ejtx). Finally, one hectare is 10,000m².

Note that provenances can be exchanged between organizations and used in the Traces portal in the form of GeoJSON [15] files. The ONIX format for a provenance described above is different, but it is designed to be relatively straightforward to convert between GeoJSON and ONIX.

Finally, remember – while all this GPS data, the provenance of the paper – looks complicated, it might be unnecessary if the paper, card or board used already has a DDS of its own. In principle, *either* a DDS for the paper *or* a set of GPS provenances should be enough (though there will no doubt be a few downstream resellers who want both…).

So how do I specify these associated DDSs for particular types of paper?

DDSs may refer to other, earlier, DDSs. The most likely case here is that the paper itself is a product in its own right, sold business-to-business within the printing industry. It will often have a DDS of its own, if it was produced within the EU or imported into the EU as a reel of paper (before being printed). Knowing the DDS reference for the paper reduces the need to use the GPS provenances for that paper when creating the DDS for the book. These 'associated DDSs' can be listed <ProductFormFeature> too, using Product form feature type code 51:

```
<ProductFormFeature>
    <ProductFormFeatureType>51</ProductFormFeatureType><!-- associated DDS(s) -->
    <ProductFormFeatureValue>25SEWBW6BMT874+0123456789
        25FIGRB31LV129+0123456789</ProductFormFeatureValue>   <!-- DDS references
                                    + verification numbers (without any spaces),
                                with each separate reference space-separated -->
</ProductFormFeature>
```

Note that code 51 can be used with or without code 50, *ie* where code 50 is absent, the code 51 DDSs are listed for future inclusion in the DDS for the book, and where a code 50 DDS is present, the code 51 DDSs can be retained as a sign that the code 50 DDS for the book includes these DDSs.

OK, so what if I change the paper source for my book?

Whether the paper is supplied by the printer, or by the publisher, it is common for different impressions of the same book (*ie* same ISBN, different manufacturing batch) to use different batches of paper, or even entirely different types, grades and brands of paper. And each batch of a specific type, grade and brand may be made from pulp from different sources. Thus – in an ideal world – the provenance geolocations for each impression of a book could be listed separately, per impression, and only the details for the latest or 'current' impression would need to be included in the ONIX.

However, that ignores the reality of the book supply chain. Put simply, most book distributors and wholesalers do not operate a strict lot control system where copies from different impressions are kept separate and fulfilled to retailers in a strict first in, first out manner. The various impressions are often commingled. Returned copies are used to fulfill new orders. And there is no machine-readable impression-level identification in use, so a retailer cannot order a copy from a specific impression. Throughout, the assumption is that all copies with the same ISBN are essentially interchangeable (fungible), even if they use physically different paper, card or board.

As a consequence of this, the EUDR provenances in ONIX should in principle include sources for *all* timber used for *all* the types, grades and brands of paper, card and board used across *all* impressions.

[15] A standard JSON data file format designed for representing simple geographical features, and used by the Traces portal. See https://geojson.org.

This 'cumulative' approach means that upon printing the third impression, the provenances of the papers used in that third impression should be *added* to the provenances listed in the ONIX or the provenances listed in a specific DDS, and the provenances of the first and second impression papers should *not* be removed.

> This exhaustive listing of *all* provenances could potentially be avoided, and only the 'current' provenances used, if all distributors and wholesalers in the supply chain implemented strict lot control and the use of returns to fulfill new orders was avoided. However, it would *still* require updates to provenances and DDS references for each distinct impression if the impression raw materials are derived from different sources.

This means that each new impression will most likely require an update of the DDS information, unless the papers used are *exactly* the same, with all the same raw material provenances as previous impressions. This 'update' process in fact involves creating a new DDS that is associated with both the previous DDS or DDSs *and* with any required new provenances.

So understanding that cumulative approach, and remembering that any particular paper might be associated with a DDS of its own *or* with a set of GPS provenances for that paper, there are two ways of getting there.

First, create the DDS for the first impression, associating it – for each type of paper – with either a pre-existing DDS for that paper, or the multiple GPS provenances for that paper. Until a second impression is created, that newly-created DDS is the DDS for the product as a whole.

When impression 2 is created, you can either:

i. create a new DDS for the product as a whole, associating it with the DDS for the previous impression, and additionally associating it with either a pre-existing DDS or the multiple GPS provenances for any *new* type of paper used solely in the second impression (if most of the papers are the same as the first impression, you don't need to repeat them, but remember the provenances might have changed even for a previously-used paper – it's really *new provenances* you add, not *new paper types*)
ii. OR create a new DDS *just for the second impression*, associating it with either the pre-existing DDSs or with the multiple GPS provenances for each type of paper used in the second impression – many of these are likely to be the same as those listed within the first impression DDS, but they still need to be repeated. Then, create a second new DDS, this time for the product as a whole, associating it with the DDSs for each of the two impressions

The net effect of i. or ii. Is the same, but method i. minimizes the amount of repetition.

Of course, using method ii., the repetition continues to build up. When impression 3 is created, you can either:

i. create a new DDS for the product as a whole, associating it with the DDS for the second impression and with the pre-existing DDSs or the GPS provenances for the *new* paper types not used in the first *or* second impression
ii. OR create a new DDS just for the third impression that is associated with either a pre-existing DDS or with lists of GPS provenances for *every* type of paper used in the third impression. Then create a second new DDS, for the product as a whole, associating it with the DDS of all impressions (including the third).

With method i., each 'product as a whole' DDS contains its predecessor nested within itself, and *that* predecessor DDS contains *its* predecessor, like a set of matryoshka dolls. With method ii., there are two DDSs per impression, and each product-as-a-whole DDS is associated with a complete and non-nested list of *all* the impression-specific DDSs up to that point (note that due to the nature of the book supply chain, those impression-specific DDSs don't have any real utility other than using them to create a 'product as a whole' DDS. They cannot be used as a DDS for the product except in very specific circumstances [16]).

Whichever method is used, i. or ii., ONIX's <ProductFormFeature> used with Feature type code 50 is for the 'product as a whole' DDS. Feature type code 51 encompasses any impression-specific DDSs used with method ii. (other than for the first impression), or just the immediately-preceding impression DDS with method i., or any DDSs for specific paper types. These code 51 associated DDSs are intended to be 'rolled up' into any code 50 DDS when it is created (or they may have *already been* rolled up, if a code 50 DDS is present in the ONIX). And of course, with either method, GPS provenances for any new paper without a pre-existing DDS use codes 47–9.

Overall, method i. is recommended. Method ii. is suitable for those who wish to retain impression-specific DDSs largely for internal use (as they can never represent the 'product as a whole' to the outside world. While the ONIX data can include a list of these impression-specific DDSs (using Product form feature type code 51), you cannot tell from the ONIX which DDS in the list represents a particular impression.

And what about POD?

Clearly, a DDS for a POD product cannot be created in the normal way, for an entire print run, and well in advance of delivery of copies to a retailer – a DDS for POD copies can only be created with knowledge of the paper used to create those particular copies, at the time of the customer order and physical manufacturing, and that paper could in principle be different for each copy.

One potential workflow could involve POD printers creating a DDS at the beginning of each month, listing the provenances or associated DDSs for all the paper, card and board the printer holds in stock at that time. That DDS would apply to all books printed during the period – or at least, to all books that fall under the same TARIC code [17] – until stock of one of the papers is exhausted and newly-delivered stock needs to be used. At that point, a new DDS would need to be created that incorporates the new paper. Of course, depending on the amount of stock held by the POD printer, the period could be longer or shorter than a month. A more nuanced alternative would be for POD printers to create one DDS per month, per 'standard specification' they use, so that paperbacks and hardbacks might have different DDSs – each specification-specific DDS would associate the different card and board types used with each specification. And dictionaries, encyclopedias, children's picture books and some other product types have TARIC codes that are different from 'normal' books, so they always require different DDSs.

For single-copy POD, that one-month DDS should be used on any shipping and customs documentation for copies printed that month. It should not be recorded by the publisher as 'the DDS for that ISBN', since it is unlikely to apply to POD copies of that ISBN for more than a month, and it would never apply to any conventionally-printed copies of that ISBN.

[16] Shipping an entire print run to the EU direct from the printer, maybe?

[17] See the following section

For copies printed using POD technology that are put into stock by the publisher's distributor or other primary stockholder, the POD DDS for that month should be recorded as if is related to a new impression of the book – that is, incorporated into the DDS for the product as described on page 8.

There are still practical issues with this workflow, including the fact that shipping and customs documentation does not currently include data fields for the necessary DDS references.

Aside from the provenances and associated DDSs, what else does registration of a new DDS require?

Import and export activity requires information about the nature of the goods being traded. As goods progress along the supply chain, various <ProductClassification> codes (also known as commodity codes, customs codes, tariff codes *etc*) are required. And if the product is transformed at various points in the chain – from timber to pulp to paper to books – a new commodity code, and for EUDR purposes, a new DDS, is required each time. For EUDR purposes, the correct <ProductClassification> is vital. Here's an example of the Product classification required for importing a typical book into the EU (different book types will have different codes):

```
<ProductClassification>
    <ProductClassificationType>05</ProductClassificationType>      <!-- TARIC -->
    <ProductClassificationCode>4901990000</ProductClassificationCode>
</ProductClassification>
<ProductClassification>
    <ProductClassificationType>20</ProductClassificationType> <!-- Additional -->
    <ProductClassificationCode>C716</ProductClassificationCode>    <!-- TARIC -->
</ProductClassification>
```

There are many different commodity coding schemes, applicable when importing or exporting from different countries. For purposes within the EU, the TARIC and CN (Combined Nomenclature) codes are important. TARIC codes are used for imports and various internal purposes, and are vital for DDS registration in Traces. CN codes are used for exports.

> Within the TARIC scheme – as with the many other classification schemes based on the WCO Harmonized System – the various codes for different types of book begin 4901,4903, maps begin 4905 and so on, but other types of physical product within ONIX might use almost any code beginning 49. Wood intended for pulping mostly uses codes beginning 4403, pulp of different types (chemical, mechanical *etc*) uses codes beginning 47. Paper, card and board products begin 48. Remember though that the complete TARIC code – of 10 (or very occasionally 11) digits – is required. Publishers not fully aware of how commodity codes are used should consult their distributor, international shipper or customs broker.

In the example above, an 'Additional' TARIC code is also included. TARIC codes are normally ten digits, but these Additional TARIC codes are four characters. There is a small group of these with specific meanings in the context of EUDR – C716 is a confirmation that a DDS is available. Y144 should be included by micro- and small enterprises to declare they are subject to the transitional arrangement that delays implementation of the Regulation by six months (until 30th June 2026). There are a small number of other Additional TARIC codes that confirm *exceptions* from EUDR.

Ooh, there are *exceptions*?

Not many. Obviously, EUDR does not apply to digital products, or to physical products that are not made (ultimately) of wood (or coffee, cocoa *etc*). But within the broad TARIC categories where EUDR does apply, there are a few exceptions.

Products that are not made of paper, card or board are outside the scope of the Regulation, even if their TARIC code suggests they are *in* scope. Examples here would include waterproof maps made of Tyvek or similar, bath books made of vinyl (unless the pages are stiffened with card inside the vinyl), or rag books made of textile – and Additional TARIC code Y129 would apply to all of these. Equally, products where the paper, card and board are all *entirely* made from recycled material are outside the scope, Y133 applies.

'Non-commercial' activities, which perhaps might include Book Fair stock that will not go on sale in the EU, can also be excepted. Y142 applies.

And products that were manufactured before 30th June 2023 (specifically, *all* copies of the product were printed on material from before that date [18]), or where more recent copies are physically present within the EU (in a warehouse or at a retailer) before 30th December 2025 are also (mostly) out of scope. Y132 applies to the former (only) [19]. These transitional arrangements are described in more detail on page 14.

Can I also express these exceptions in ONIX?

Of course. There are a number of ways to do this. First, it is obviously important to get <ProductForm> and <ProductFormDetail> correct (and for the waterproof maps example, Product form detail code B524 would be vital). Second, for 100% recycled paper, <ProductFormFeature> with Product form feature type code 37 can specify the pre- and post-consumer waste percentage (although don't forget, if the book block is 100% recycled but the jacket or cover card or board is not, the product as a whole does not meet the required 100%). If you are satisfied that the product is beyond the scope of the Regulation, then you can use <ProductFormFeature> (in addition to Y133 or Y129) to attest to this:

```
<ProductFormFeature>
    <ProductFormFeatureType>56</ProductFormFeatureType>     <!-- beyond scope -->
</ProductFormFeature>
```

This is a simple 'flag', and neither Product form feature value nor Product form feature description are needed, but a few words of explanation in Product form feature description would not go amiss. A similar flag can be used to attest that all stock present in the EU was physically present before the implementation date of the Regulation. Of course this becomes irrelevant as soon as there is a DDS, or when any new copies are printed and distributed, and at that point it should be removed from the ONIX.

```
<ProductFormFeature>
    <ProductFormFeatureType>54</ProductFormFeatureType>        <!-- all stock -->
</ProductFormFeature>            <!-- present in the EU prior to 30 Dec 2025 -->
```

[18] This is why the date of harvest in a provenance is important. See page 4. The importance of this date will diminish over time, and will most likely become irrelevant in mid-2008.

[19] The Additional TARIC codes described above are not the only codes available.

One final exception can be where all copies of a product were manufactured before EUDR passed into law in mid-2023. This can be expressed in ONIX using the <PublishingDate> with date role 12 – the date of the most recent reprint. Stock that has been in a warehouse since that date (and not commingled with more recent reprints) is exempted.

```
<PublishingDate>
    <PublishingDateRole>12</ PublishingDateRole >     <!-- latest reprint date-->
    <Date>20230505</Date>                          <!-- prior to 29 June 2023 -->
</PublishingDate>
```

Obviously, there is no ONIX equivalent of Y142 for non-commercial activity, since that would only apply to a specific shipment of goods.

Getting back to what else is needed to obtain a DDS…

Aside from 'beyond scope', there are a couple of other legal attestations that must be made in order to register a DDS with the Traces portal. The Regulation contains a requirement that the timber (or coffee, cocoa *etc*) is harvested in accordance with all local laws, and an overarching requirement that the product must be 'deforestation-free'. The former, using code 52, should include a list of country codes in <ProductFormFeatureValue>. Presence of code 52 and a country code acts as an positive indication that the product's raw materials which were sourced from the specified country in compliance with the national laws of that country. Code 53 requires only Product form feature type.

```
<ProductFormFeature>                          <!-- compliant with all relevant -->
    <ProductFormFeatureType>52</ProductFormFeatureType>    <!-- national laws -->
    <ProductFormFeatureValue>CA SE FI<ProductFormFeatureValue>
</ProductFormFeature>
<ProductFormFeature>                                    <!-- deforestation -->
    <ProductFormFeatureType>53</ProductFormFeatureType>            <!-- free -->
</ProductFormFeature>
```

Both of these ONIX attestations are essentially irrelevant once there is a DDS for the product.

And finally, there are a handful of ONIX product attributes which must be included for EUDR purposes if they're not already present. First, the *weight* of the product, ideally in grams; second, the names of both the publisher (or the in-EU publisher representative acting on the publisher's behalf) and the distributor (if there are multiple markets, obviously this is the in-EU distributor); and third, of course, the publication date or the local market publication date in the EU.

```
<!-- in Block 1 -->
<Measure>
    <MeasureType>08</MeasureType>                    <!-- weight is 225 grams -->
    <Measurement>225</Measurement>
    <MeasureUnitCode>gr</MeasureUnitCode>
</Measure>

<!-- in Block 4 -->
<Publisher>
    <PublishingRole>01</PublishingRole>          <!-- Book House publisher is -->
    <PublisherName>Book House Publishers Inc</PublisherName>  <!-- outside EU -->
</Publisher>
```

```
<PublishingDate>
    <PublishingDateRole>01</PublishingDateRole>         <!-- publication date -->
    <Date>20260102</Date>
</PublishingDate>

<!-- in Block 6, where <Market> specifies the EU countries -->
<PublisherRepresentative>
    <AgentRole>05</AgentRole>          <!-- BH GmbH acts as 'local publisher' -->
    <AgentName>Book House GmbH</AgentName> <!-- on behalf of BH Inc inside EU -->
</PublisherRepresentative>
<MarketDate>
    <MarketDateRole>01</MarketDateRole>    <!-- publication date in EU market -->
    <Date>20260102</Date>   <!-- (if later than the Block 4 publication date) -->
</MarketDate>

<Supplier>
    <SupplierRole>02</SupplierRole>        <!-- distributor of BH books in EU -->
    <SupplierName>Schengen Distribution SàRL</SupplierName>
</Supplier>
```

This all seems so sudden! Some of my books were printed years ago – are there transitional arrangements for old stock?

There are. It comes down to when the trees were harvested and when the physical books enter the EU. As previously noted, the Regulation came into force on 29th June 2023, the implementation date is 30th December 2025 [20], and the period between these dates is the 'transitional period'. There is also a review date for the legislation at the end of 2028. These are the three key dates.

i. book copies physically manufactured from trees harvested prior to the transitional period, and which enter the EU before the end of 2028 are exempted from the requirement for a DDS, but some due diligence and record keeping is still required so that compliance with these dates can be demonstrated if required. You also need to be sure that the wood conformed to the requirements of the older EUTR at that time
    a. if these books enter the EU *after* the end of 2028, they will be subject to the full requirements of EUDR

ii. book copies physically manufactured from trees harvested during the transitional period, and which enter the EU before the end of the transitional period are exempted from the requirement for a DDS, but some due diligence and record keeping is still required so that compliance with these dates can be demonstrated if required. You also need to be sure that the wood conformed to the requirements of the older EUTR
    a. if these books enter the EU *after* the end of the transition period, they are subject to the full requirements of EUDR

iii. of course, book copies physically manufactured from trees harvested after the end of the transitional period are subject to the full requirements of EUDR from the outset

iv. the transition period is extended to mid-2026 for micro- and small enterprises. However, these small organizations may still need to pass relevant data on to larger organizations downstream who are not afforded the extra six months.

[20] Or 30th June 2026 for micro-and small enterprises.

Frequently asked questions

Does EUDR apply to reprints, or only to books actually published after 30th December 2025?
It applies to reprints as well [21]. And if some copies of a particular impression are already physically in the EU by 30th December 2025, those copies are okay, but importing further copies – even copies of the same impression – into the EU in 2026 may not be in compliance if any of the raw materials used in that impression are non-compliant.

The level of due diligence over raw materials provenance, and the requirement to create Due Diligence Statements (DDSs), varies between 'operators' and 'traders'. Which one am I?
Discussion of this is somewhat beyond the scope of this application note. All parties should consult their legal advisers to understand their responsibilities under the Regulation.

Does EUDR apply across the European Economic Area (EEA) like the GDPR privacy regulations, or is it limited to the 27 countries of the European Union?
It's not yet clear. The three additional countries in the EEA (Norway, Iceland, Lichtenstein) are currently studying this.

Does EUDR apply to imports into the UK (from* outside *the EU)?
The UK has a special status in regard to EUDR. As a result of special arrangements for Northern Ireland, the United Kingdom is partly inside and partly outside the EU (at least for the purposes of the Regulation). In the near-absence of internal controls on transfer of books between the island of Ireland and Great Britain, it is best to assume books imported into the UK from *outside* the EU are subject to EUDR (because it is very difficult to exclude them from Northern Ireland). Of course, books imported into the UK from *inside* the EU are clearly in scope.

And what about books produced in the UK?
EUDR does not apply to books produced in the UK, unless they are then exported to the EU. However, as above, Northern Ireland counts as part of the EU in this context – so it may be best to act as if EUDR *does* apply to all UK-produced books.

You mentioned copies that are in the EU before 30th December 2025 are out of scope. Tell me more.
Yes, they are 'out of scope' – but they have to be physically in the EU, not waiting in a non-EU warehouse ready to be sent to the EU in 2026 or later. Obviously, you still need some level of due diligence on this, and documentation to prove the goods entered the EU before the key date. And this exception will not apply if any *further* copies are imported into to the EU after the end of the transitional period and commingled with the older stock.

Does EUDR apply to single copies fulfilled direct to an EU consumer from outside the EU, or only to books traded B2B?
It doesn't apply to individual B2C transactions, but there will still be a need to supply some data such as TARIC codes on customs documentation that may not have been necessary for single copies in the past.

[21] There is understandable uncertainty over this, as the Regulation uses phrases like 'make the product available before 30th December'. Publishers are used to interpreting 'the product' as 'the ISBN', so it appears that products published before the key date are outside the scope of EUDR. However, the Regulation considers 'products' to be individual copies, so the date of publication is not the correct criterion.

Does it matter where the publisher is based?
Not much. Unless the books are physically manufactured in the EU, the key trigger for non-EU publishers is when the physical products cross an international border, as they enter or leave the EU.

Is there some global master list of forests, with information about when a particular plot or polygon was deforested or degraded?
The EU will make use of the 'EU Observatory' – see https://forest-observatory.ec.europa.eu – which maps and monitors land use. It will be used to inform risk assessments and enforcements. The country a particular forest plot is in will also guide enforcement (countries have been classified as 'low risk' and 'standard risk', but these classifications are likely to evolve over time).

Does FSC accreditation remove the need for DDSs?
No. The Forest Stewardship Council helps organizations comply, but does not absolve operators of their responsibility for due diligence and registration of DDSs with the Traces portal. See https://fsc.org/en/fsc-eudr-offering for more detail.

Are there third-party agencies that can help with compliance?
Yes. A number of third parties offer compliance services, and can for example register DDSs in the Traces portal on behalf of a publisher or importer. However, they will be reliant on the same product data, provenances and associated DDSs data from printers and publishers that the publisher or importer would need to register its own DDS.

As a publisher outside the EU, who is responsible for creating the DDS when books are imported into the EU?
First, it's worth emphasizing that the Regulation specifies that *all* parties in the supply chain share responsibility for compliance. Now, the Traces access needed to create a DDS is only available to in-EU organizations, but on the other hand, a non-EU publisher could use a third party as above. The legal responsibility may ultimately depend on which party is the 'importer of record', and that in turn may depend on the INCO terms used when shipping the goods into the EU – these shipping terms define where and when responsibility for the goods transfers from consignor to consignee. But even if the sender avoids having to create a DDS, it will still need to source and supply the relevant data – the 'ingredients' – required to do so.

What happens if all the paper in my product is 'deforestation-free', except for the endpapers?
For a product to be compliant with the Regulation, *all* its raw materials must be compliant.

Are we concerned only with books here – ONIX Product forms beginning with B?
No, we're concerned with products constructed from paper, card and board. So even a bookmark or a postcard can be considered in scope.

Does EUDR apply to packaging, like a slipcase or a box that contains a book and a toy?
Yes. Raw materials used to construct packaging that is characteristic of the product like a slipcase or decorative box is within the scope of the Regulation. Secondary packaging like printer's cartons are not in scope when supplied full of books – but they are in scope when the cartons themselves are the product (*ie* when the carton manufacturer sells cartons to the printer).

How long does my DDS last?
A year. For regularly-reprinted titles, a new DDS will need to be created each time new sources of raw materials are used (and most likely, that will be at the time of each new impression). For less-frequently reprinted titles from outside the EU, a new DDS will be required when the most recent DDS is more than a year old and a new shipment of copies (even if from the same impression) crosses the border into or out of the EU.

How accurate do the polygons have to be? Could I create a polygon the size of Finland to cover all Spruce trees harvested there?
You could – though you'd need to account for several different species of Spruce. However, as your polygon grows, the risk of deforestation somewhere – anywhere – in Finland *but outside your particular forest*, grows too. And in turn, that deforestation could invalidate your DDS and lead to exclusion of your product from the EU market, or open up the possibility of fines, *even if no trees from that deforested area have been used in your product*. So there's a trade-off between polygon accuracy and business risk. Prudence would indicate polygon outlines should stick closely to land ownership boundaries or smaller parcels of land.

Do I always have to list the GPS coordinates?
No. In fact, for many products, there may not be a need for GPS coordinates at all. If the paper used has a DDS (one for each type of paper, card, board used in construction of the product, of course), then the DDS for the product just needs to reference the various DDSs for the constituent paper types. In effect, DDSs can be nested like matryoshka dolls, each one referencing previous DDSs – eventually going back to a DDS that *does* list the GPS provenances. On the other hand, some resellers may require the GPS coordinates as part of their internal due diligence processes.

As an SME, am I subject to the same requirements as larger organizations?
Broadly yes, although there are mitigations. A micro- or small enterprise has six extra months before the Regulation applies. Longer-term, small enterprises do not need to repeat due diligence that has already been carried out further up the supply chain (*ie* they can accept provided information at face value), and they have reduced requirements for risk mitigation. Micro enterprises can mandate 'the next organization along the supply chain' to complete the due diligence and submit a DDS.

What about the differences between 'operators' and 'traders'?
That's beyond the scope of this paper, but see page 2. Every organization should consult a legal advisor to understand its status and responsibilities under the Regulation.

What about POD products?
The workflows necessary to ensure compliance of POD products remain a little unclear, and the potential workflow discussed on page 10 of this application note is not universally agreed. The note will be updated as this changes.

I know the implementation of EUDR was delayed for a year. Is there any chance of another delay?
This looked unlikely, but another year's delay has recently been proposed by Jessika Roswall, EU Commissioner responsible for environment, water resilience and a competitive circular economy. However, any change of dates needs to be agreed by the EU Commission, the European Parliament and the Council of the European Union, so it remains uncertain.

Can the required EUDR metadata be included in ONIX 2.1?
No. And some key ONIX recipients who need EUDR metadata – for example Amazon – no longer accept v2.1 for the relevant physical products anyway.

And what about 3.0? Or do I have to use the latest 3.1?
3.0 is fine. EDItEUR deliberately chose to ensure use of 3.0 remained an option.

For further information

- Guidance from the EU
  – https://green-forum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation_en
  – https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en
  – https://environment.ec.europa.eu/publications/frequently-asked-questions-deforestation-regulation_en (FAQs)
  – https://green-forum.ec.europa.eu/nature-and-biodiversity/deforestation-regulation-implementation/factsheet-smes_en (guidance for SMEs)
  – https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/aa55d53f-a605-4d8d-8fce-1594abab3a40/details (Traces user guide)
  – https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115&qid=1687867231461 (full text of the Regulation)
- TARIC code browser
- ONIX code browser (multi-lingual)
- BIC's advice on EUDR practicalities (mostly for the UK)

This application note is *not* a full guide to a publisher's or a reseller's responsibilities under the Deforestation Regulation. Key topics not covered include how publishers and resellers should obtain necessary metadata from printers, paper manufacturers and even forestry companies, what constitutes the required level of due diligence and risk mitigation, and detailed legal requirements for operators and traders under the Regulation. It is intended primarily to illustrate how ONIX can be used to enable the flow of EUDR-related metadata from publishers to resellers. Later revisions of the application note may be expanded to tackle some of these other topics.

Graham Bell
EDItEUR
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