

A COMPREHENSIVE EUDR GUIDE 2025



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Introduction to EUDR

The EU Deforestation Regulation (EUDR) represents a pivotal shift in environmental legislation, aiming to curtail the detrimental impacts of deforestation and forest degradation on a global scale. The regulation originally entered into force on July 29, 2023 and prohibits companies from placing commodities associated with deforestation and forest degradation on the EU market or exporting them from the EU. The major compliance obligations were initially set for December 30, 2024, but were later delayed by one year.

This regulation emerged in response to alarming statistics, such as the loss of 420 million hectares of forest to deforestation between 1990 and 2020, which significantly contributes to climate change and biodiversity loss.

The EUDR seeks to address these issues by reducing the EU's influence on global deforestation, lowering greenhouse gas emissions, and promoting biodiversity. The regulation's comprehensive approach targets the root causes of deforestation and emphasizes the importance of sustainable practices.

This report aims to provide a thorough understanding of EUDR and the compliance journey. We will delve into the specifics of the regulation and outline steps to ensure compliance. Whether you're just starting or looking to deepen your knowledge, this guide will equip you with the essential information and strategies to navigate the complexities of EUDR compliance.

Which Commodities Must Be Compliant Under the EUDR?

The EUDR targets seven critical commodities that significantly impact global deforestation and forest degradation due to their high consumption volumes in the EU. According to a recent study, these seven commodities represent the largest share of EU-driven deforestation:

- Oil Palm: 34.0%
- Soy: 32.8%
- Wood: 8.6%
- Cocoa: 7.5%
- Coffee: 7.0%
- Cattle: 5.0%
- Rubber: 3.4%

In addition, operators must ensure that livestock feed does not contribute to deforestation. The regulation requires geolocation data for establishments where cattle were raised but not for the feed itself unless there are substantiated concerns about compliance.

For a comprehensive list of these commodities, you can have a look at [Annex I](#).

Key Terms

Key Terms	Definition
Relevant Commodities and Products	– Cattle, cocoa, coffee, oil palm, rubber, soya, and wood. – Products listed in Annex I that contain, have been fed with, or have been made using relevant commodities.
Deforestation	The conversion of forest to agricultural use, whether human-induced or not.
Forest Degradation	Structural changes to forest cover, such as the conversion of primary forests or naturally regenerating forests into plantation forests or other wooded land, or primary forests into planted forests.
Agricultural Plantation	Land with tree stands in agricultural production systems, such as fruit tree plantations, oil palm plantations, olive orchards, and agroforestry systems where crops are grown under tree cover; excludes plantations of relevant commodities other than wood.
Primary Forest	Naturally regenerated forest of native tree species with no clearly visible indications of human activities and undisturbed ecological processes.
Naturally Regenerating Forest	Forest predominantly composed of trees established through natural regeneration, including forests that cannot be distinguished as planted or naturally regenerated, forests with a mix of naturally regenerated native trees and planted trees, coppice from naturally regenerated trees, and naturally regenerated trees of introduced species.
Planted Forest	Forest predominantly composed of trees established through planting or deliberate seeding, with planted or seeded trees expected to constitute more than 50% of the growing stock at maturity, including coppice from planted or seeded trees.

Key Terms Continued

Key Terms	Definition
Plantation Forest	A planted forest that is intensively managed, consisting of one or two species, even age class, and regular spacing; includes short rotation plantations for wood, fiber, and energy, but excludes forests planted for protection or ecosystem restoration.
Other Wooded Land	Land not classified as forest, spanning more than 0.5 hectares, with trees higher than 5 meters and a canopy cover of 5 to 10%, or with a combined cover of shrubs, bushes, and trees above 10%, excluding land predominantly under agricultural or urban land use.
Deforestation-Free	Relevant products containing, fed with, or made using relevant commodities produced on land not subjected to deforestation after December 31, 2020; for wood products, harvested without inducing forest degradation after December 31, 2020.

What's New in 2025?

1. Country Risk Classification Published

As of May 2025, the European Commission has published the first official list differentiating between individual countries' deforestation risk for its seven key commodities:

- **Low Risk:** Simplified due diligence applies.
- **Standard Risk:** Full due diligence required.
- **High Risk:** Enhanced due diligence and more checks by authorities.

A Due Diligence Statement (DDS) must be submitted regardless of a country's risk category, but the risk category does impact the DDS requirements. Products from all countries must satisfy the deforestation-free (or degradation-free in the case of timber) requirement and production in accordance with local laws requirement (Article 3). For low-risk countries, fulfilling Article 3 is all that is required and is referred to as "simplified due diligence". However, products from standard and high-risk countries must also include a risk assessment (Article 10) and risk mitigation (Article 11) strategy as part of their DDS; this is termed "full due diligence". EU authorities will inspect at least 9% of operators and traders from High-Risk, 3% from Standard-Risk, and 1% from Low-Risk countries annually. These percentages apply not just to the number of operators but also to the volume of products being imported or exported.

Risk Classification	Minimum Inspection Rate	Due Diligence Required
Low	1%	Simplified
Standard	3%	Full
High	9%	Full

Key Impact: Operators can now adapt their risk assessment strategy based on the country of production, focusing efforts where risk is highest.

[🔗 Country Classification List](#)

[🔗 More on the methodology.](#)

What's New in 2025?

2. EUDR Simplification Measures Announced

In May 2025, the European Commission introduced administrative simplifications to help companies—especially SMEs:

- Streamlined data collection tools.
- Large companies can reuse existing due diligence statements when goods are reimported to the EU market.
- Authorized representatives can submit a Due Diligence Statement (DDS) on behalf of members of company groups
- Companies can submit DDS annually instead of for every shipment.
- Simplified obligation for large companies will be sufficiently met by collecting DDS reference numbers from their suppliers and using those references for their own DDS submissions.
- Clarification of 'ascertaining' that due diligence has been carried out, so that large companies downstream benefit from simplified obligations (a minimal legal obligation of collecting reference numbers of Due Diligence Statement (DDS) from their suppliers and using those references for their own DDS submissions now applies)
- Harmonized templates and clearer definitions.
- Enhanced support for micro and small enterprises.

[!\[\]\(6605b201d6f14d9b3bcb8ab5f274d107_img.jpg\) Press Release – Simplifications](#)

3. Updated FAQs & Guidance (May 2025)

The latest guidance clarifies:

- When packaging is excluded from compliance. For more on packaging see [Exempted Products](#).
- How operators and traders differ in their obligations.
- What geolocation data must include (precision up to the plot level).
- Updated due diligence and documentation requirements.

[!\[\]\(e8fb589d58dad1692debababa5e928b6_img.jpg\) Download FAQs & Guidance PDF](#)

When Do You Need To Be Ready?

Most companies must comply with the EU Deforestation Regulation (EUDR) by December 30, 2025. However, there is an extended compliance deadline of June 30, 2026, for operators that were deemed “small or micro-undertakings” before December 30, 2020. It covers all relevant products listed in Annex I of the EUDR

This approach allows smaller businesses additional time to align their practices with the requirements of the EUDR, ensuring a more manageable transition towards sustainability and compliance.



Exempted Products

1. EU Customs Codes Not Listed in Annex I

Any product associated with an EU customs code not listed in Annex I of the regulation is considered exempt from the EUDR.

2. Products at the End of Their Lifecycle

The EUDR does not apply to products produced entirely from materials that have completed their lifecycle and would otherwise have been discarded as waste. However, this exemption does not apply to by-products of a manufacturing process where the material involved is not classified as waste, as defined in Article 3, point 1 of EU Directive 2008/98/EC.

3. Packaging

Due diligence requirements apply to any wood or paper packaging that falls under an Annex I customs code when it is placed on the market or exported as a product in its own right.

Clarified in 2025 Guidance: Only packaging sold as a product in itself is subject to EUDR.

However, there are specific exemptions for packaging materials:

- CN Code 4415: Packaging material falling under this code is exempt from the regulation's requirements when used to support, protect, or carry another product placed on the market.
- Other Packaging Materials: The EUDR FAQ clarifies that packaging materials used to support, protect, or carry another product, regardless of their CN code, are not relevant within the meaning of Annex I. This includes paper and card packing materials, such as those falling under CN 4819.
- User Manuals: Manuals accompanying shipments are not considered relevant products unless they are purchased independently.

Obligations Under the EUDR: Operators

Obligation	Operators
Product Compliance	Operators must ensure their products are deforestation-free, produced according to relevant local laws, and covered by a due diligence statement.
Due Diligence	Operators must implement a due diligence system and take formal responsibility for product compliance. This involves collecting necessary information, assessing risks, and implementing risk mitigation measures for all products supplied by each supplier before placing them on the market or exporting them. Operators must also be ready to receive and investigate substantiated concerns from stakeholders.
Annual Review and Updates	Operators must review their due diligence system at least once a year. If new developments arise that could influence the system, they must update it accordingly. Records of these updates must be kept for five years.

The collected information must include:

1. Product Description
2. Product Quantity
3. Country of Production
4. Geolocation
5. Supplier and Recipient Information
6. Verification of Deforestation-Free Status

Obligations Under the EUDR: Operators

Obligation	Operators
Public Reporting	Operators, except SMEs, microenterprises, or natural persons, must annually report on their due diligence system. This report should be publicly accessible online and detail steps taken to meet Article 8 obligations. If subject to other EU due diligence laws, operators can include the required information in those reports to fulfill their EUDR reporting obligations.
Simplified Due Diligence	<ol style="list-style-type: none">1. Exemption Conditions: Operators are exempt from Articles 10 and 11 if all relevant products are from low-risk regions (Article 29). They must provide documentation to authorities upon request, demonstrating negligible risk of circumvention.2. Handling Relevant Information: If operators find information indicating non-compliance or circumvention, they must fulfill all obligations under Articles 10 and 11 and immediately inform the competent authority.3. Competent Authorities' Actions: authorities must take immediate action if they find risks of circumvention, including interim measures as outlined in Article 23.

The collected information must include:

1. Product Description
2. Product Quantity
3. Country of Production
4. Geolocation
5. Supplier and Recipient Information
6. Verification of Deforestation-Free Status

Obligations Under the EUDR: Traders

Obligation	Traders
Information Management	Traders must collect and maintain information on suppliers and buyers, including due diligence statement reference numbers, for at least five years. This information must be provided to authorities upon request.
Compliance Assurance	Non-SME traders must ensure due diligence is exercised and that products are compliant before making them available on the market.
SME-Specific Obligations	SME traders must keep information on suppliers and buyers and provide it to authorities when requested.
Reporting Non-Compliance	Traders must immediately inform authorities and downstream traders if new information indicates a risk of non-compliance.
Assisting Authorities	Traders are required to provide necessary assistance to authorities during compliance checks, including access to premises and records.

Risk Assessment

Operators must verify and analyze the information collected according to Article 9, along with any other relevant documentation. Based on this information, they must determine if there is any risk that the relevant products intended for the market or exports are non-compliant. Operators are prohibited from placing these products on the market or from exporting them unless the risk assessment indicates no or only a negligible risk of non-compliance.

Criteria	Description
Country of Production	The risk assigned to the relevant country or parts thereof, particularly regarding the presence of forests and indigenous peoples, and any claims made by these peoples about land use or ownership.
Environmental Factors	The prevalence of deforestation or forest degradation in the country or parts thereof.
Information Quality	The source, reliability, validity, and connection to other available documentation.
Country-specific Concerns	Issues such as corruption, document falsification, law enforcement, human rights violations, armed conflict, and sanctions.
Supply Chain Complexity	Challenges in linking products to specific plots of land and the risk of regulation circumvention.
Expert Group Conclusions	Recommendations from Commission expert groups.
Historical Compliance	Previous compliance issues within the supply chain.
Supplementary Information	Additional data on compliance, including third-party certifications recognized by the Commission.

Risk Mitigation Assessment

If the risk assessment reveals any risk greater than negligible, operators must adopt risk mitigation procedures before placing products on the market or exporting them. These procedures should ensure the risk is reduced to no or only negligible levels and may include:

1. **Additional Information:** Requesting further information, data, or documents.
2. **Independent Audits:** Conducting independent surveys or audits.
3. **Supporting Compliance:** Assisting suppliers, particularly smallholders, through capacity building and investments.

Operators must have adequate and proportionate policies, controls, and procedures to effectively manage and mitigate the risks of non-compliance. These measures include model risk management practices, record-keeping, internal control, compliance management (including appointing a compliance officer for non-SME operators), and independent audits.

All decisions on risk mitigation procedures and measures must be documented, reviewed annually, and made available to competent authorities upon request. Operators must be able to demonstrate how these decisions were made.

Obligations of Member States and Their Competent Authorities

Technical Assistance and Guidance (Article 15):
Member States and the Commission may provide assistance to operators, focusing on SMEs and micro-enterprises, to help them meet due diligence obligations.

Obligation to Carry Out Checks (Article 16):
Competent authorities must perform risk-based checks to ensure compliance. Annual checks must cover at least:

- 1% of operators from low-risk countries.
- 3% of operators from standard-risk countries,
- 9% of operators and the quantity of products from high-risk countries,

Immediate Action for High-Risk Products (Article 17):
Competent authorities must identify and take immediate action on high-risk products, potentially suspending their market placement or export.

Checks on Operators and Traders (Articles 18 and 19):
Authorities must verify due diligence systems of operators and non-SME traders through documentation and, if necessary, on-the-ground examinations. For SME traders, checks focus on compliance documentation, with spot checks as needed.

Recovery of Costs (Article 20):
Member States may allow authorities to reclaim non-compliance costs from operators or traders, including costs for testing and storage.

Cooperation and Information Exchange (Article 21):
Authorities must cooperate with each other, customs, and the Commission, sharing information and coordinating enforcement efforts. They must alert others about potential non-compliance.

Reporting (Article 22):
Member States must report annually on EUDR application by April 30, including plans, results, and corrective actions.

Controls on Products Entering or Leaving the Market (Article 26):
Relevant products under the customs procedure 'release for free circulation' or 'export' are subject to controls. Competent authorities enforce the EUDR using a risk-based approach, while customs authorities perform controls on declarations. The due diligence statement reference number must be provided to customs authorities before product release. Both authorities must closely cooperate and exchange necessary information.

Electronic Interface (Article 28):
By June 30, 2028, the Commission will develop an electronic interface to transmit data between national customs systems and the EUDR information system.

Obligations of Member States and Their Competent Authorities

Penalty	Description
Fines	Fines proportional to the environmental damage and the value of the non-compliant products or commodities.
Confiscation	Seizure of the non-compliant products from the operator and/or trader.
Confiscation of revenues	Seizure of the revenues gained from transactions involving the non-compliant products.
Exclusion from public procurement	Temporary exclusion from participating in public procurement processes, for up to 12 months.
Prohibition to trade	Temporary prohibition from placing products on the EU market or exporting them.
Prohibition to Use Simplified Due Diligence	Prohibition from using the simplified due diligence procedure outlined in Article 12.

Cooperation with Third Countries

Cooperation with Third Countries (Article 30)

The Commission and Member States will work with producer countries, especially those at high risk, to address deforestation by developing a strategic framework, considering existing and future partnerships, and mobilizing relevant EU instruments. These efforts will focus on tackling deforestation and forest degradation, promoting sustainable commodity production, and supporting local communities and smallholders.

Recovery of Compliance Costs

The regulation allows Member States to recover the costs associated with non-compliance from the responsible operator or trader. This can include costs for product testing, temporary storage, destruction (if necessary), and any additional investigative or administrative procedures. This provision acts as a financial deterrent against non-compliance, while also ensuring that public resources are not unduly strained by the enforcement process. Operators must be aware that failure to meet due diligence obligations could lead to significant financial liabilities, above and beyond potential market access restrictions.

Annual Reporting to the European Commission

Each Member State is mandated to submit an annual report to the European Commission by April 30. This report must detail the implementation of the EUDR, including the number and type of checks conducted, outcomes of these inspections, and any corrective actions taken. It must also include plans for improving enforcement strategies in the future. This reporting mechanism creates a continuous feedback loop, enabling the Commission to assess overall EU-wide compliance and to update guidance or enforcement priorities accordingly. Transparency in this process is critical to building trust across supply chains and among international partners.

Coordination and Information Sharing

Member States are obligated to coordinate closely with each other, the European Commission, and customs authorities to ensure consistent enforcement of the EUDR. This involves sharing intelligence on non-compliant operators, trends in deforestation-linked commodities, and best practices in enforcement. Additionally, this coordination helps identify fraudulent documentation or circumvention tactics that might span across borders. Effective collaboration will be especially important when dealing with operators who trade across multiple EU markets or when identifying systemic issues tied to specific countries or supply chains.

Controls at Border and Customs Points

For products entering or leaving the EU market under customs procedures labeled “release for free circulation” or “export,” Member States must apply rigorous control mechanisms. Operators must provide the due diligence statement reference number to customs authorities before a product is cleared. Customs authorities will use this number to verify the compliance of the shipment and may halt products suspected of non-compliance. In high-risk cases, both customs and competent authorities must work in tandem to inspect documentation and may even conduct physical checks. This system adds an important enforcement layer at the EU’s borders, preventing non-compliant goods from slipping through.

Digital Interface for Data Exchange

To streamline compliance and enforcement, the European Commission is developing an electronic interface by June 30, 2028. This digital system will connect national customs databases with the EUDR information system, enabling real-time data exchange between Member States and the Commission. Once operational, this interface will reduce administrative duplication, enhance traceability, and speed up inspections by providing authorities with immediate access to product declarations and due diligence documentation. This system is expected to become a cornerstone of long-term EUDR enforcement, especially as data volumes grow and more countries are classified under the risk system.

How Orbify Can Assist You in Getting EUDR Compliant

Our EUDR tool assists businesses in preparing for EUDR compliance. Utilizing reliable satellite data, our tool supports your compliance journey with just a few clicks!

Below, we present the key features of our EUDR platform:

Comprehensive Plot Overview

With just a few clicks, you can access detailed information about the location and plot specifics, ensuring you have all the necessary data at your fingertips.

EUDR Project Compliance Report and Screening

[Regulation \(EU\) 2023/1115](#) of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation.

Verification of Regulation (EU) 2023/1115 compliance for project **Oil palm plantation - EUDR compliance**, located in **East Kalimantan, Indonesia**.

Report was created at 2025-01-17 13:04

This report aims to determine if your plot is likely to be compliant by assessing:

- **Baseline forest extent** on 31/12/2020
- **Post-2020 deforestation/forest degradation**
- **Commodities** grown within the plot

EUDR compliance	Likely compliant
Location, country	East Kalimantan, Indonesia,Indonesia
Project area	11.72
Deforestation alerts	No deforestation alerts detected
Commodity plots	Industrial Oil Palm, HCS Oil Palm



As outlined in EUDR Article 29 we assess the administrative risk level in accordance with the country's risk classification.

Country Benchmarking Assessment

EUDR; Article 29

The European Commission has established a three-tier benchmarking system to classify commodity-producing countries as low, standard, or high risk. This enables regulators to target their product checks and allows operators to undertake simplified due diligence for products from low-risk countries.

- **Low risk:** Competent authorities will check 1% of operators. Operators must satisfy Articles 3, 13 and 31.
- **Standard risk:** Competent authorities will check 3% of operators. Operators must satisfy Articles 3, 10, 11, 13 and 31.
- **High risk:** Competent authorities will check 9% of operators. Operators must satisfy Articles 3, 10, 11, 13 and 31.

Standard Risk

Country Benchmarking System Risk

Competent authorities will check 3% of operators

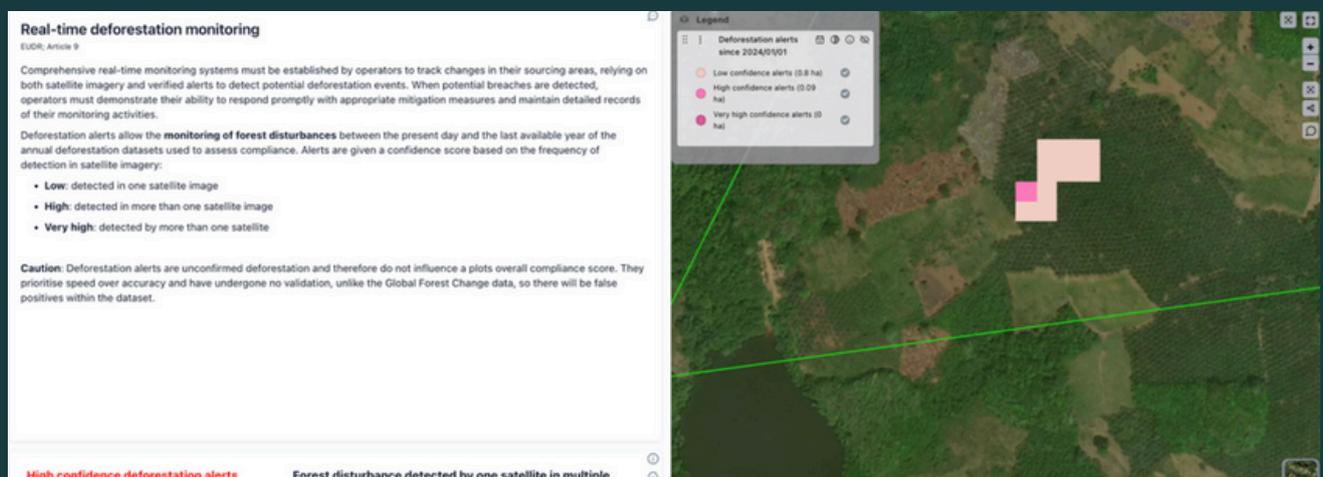
Details

Real-Time Deforestation Monitoring

Orbify's real-time deforestation monitoring assists with Article 9 alignment as a tool for risk assessment and mitigation within the due diligence process. Deforestation alerts enable the detection of forest disturbances occurring between the current date and the most recent year covered by annual deforestation datasets used for compliance assessments.

Each alert is assigned a confidence level based on how frequently the disturbance is detected in satellite imagery:

- Low: Detected in a single satellite image
- High: Detected in multiple images from the same satellite
- Very High: Detected by multiple satellites



This is particularly valuable for demonstrating an operator's capacity for ongoing vigilance and response.

However, to comply with Article 9:

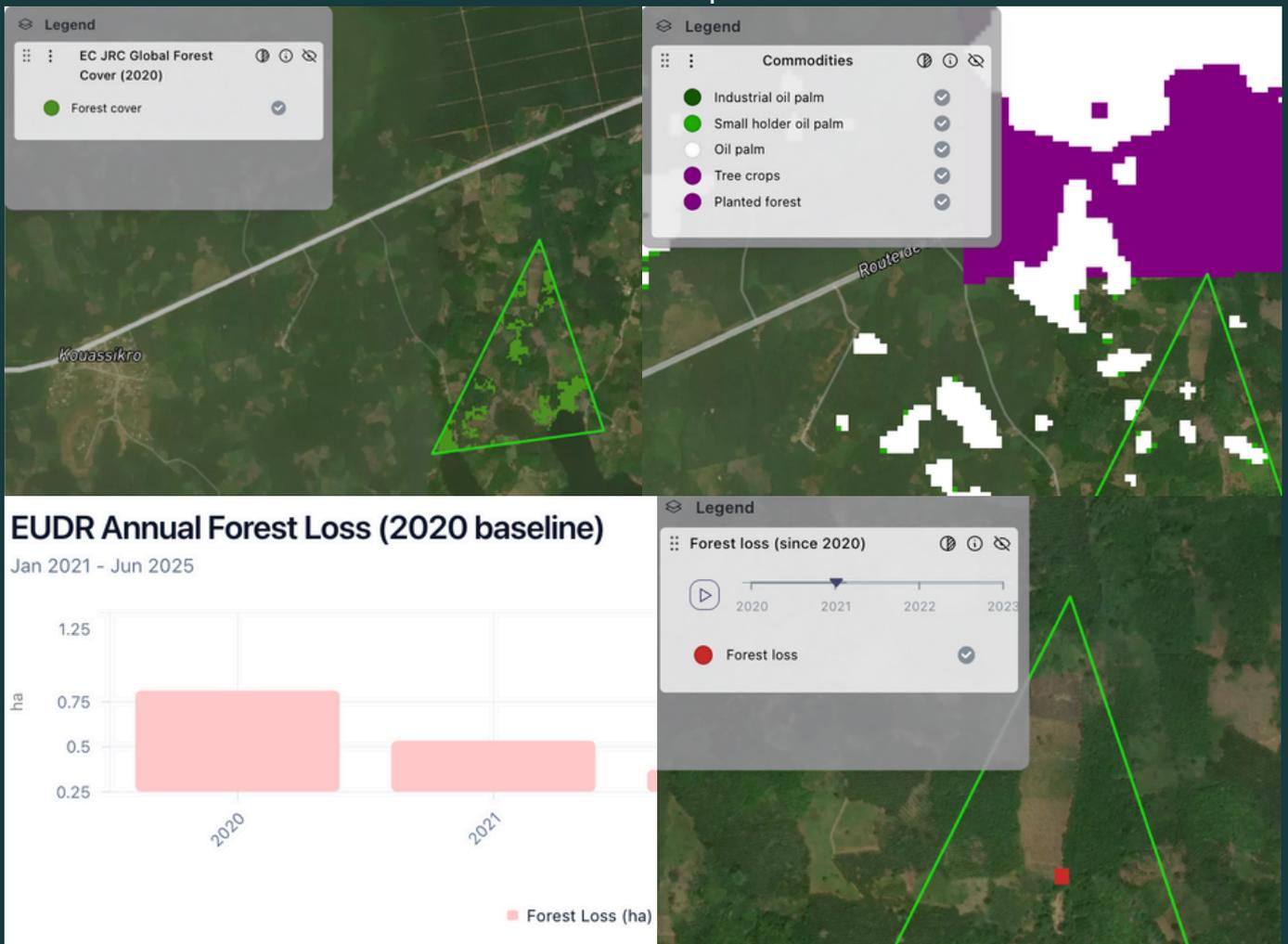
- Operators must still base their final due diligence conclusions on validated data,
- Complete the due diligence process before placing products on the market,
- Ensure they assess all relevant laws, not just forest loss.

EUDR Deforestation-Free Assessment

To assess the deforestation-free requirement of a plot after the cut-off date (31/12/2020) we analyze three critical aspects:

1. Forest extent at the cut-off date
2. Commodity extent at the cut-off date
3. Deforestation and forest degradation after the cut-off date

We combine these three aspects to provide you with a compliance score, which adheres to the deforestation-free requirement of Article 3.



Detected forest loss in the plot since December 2020

EUDR compliance assessment

Likely non-compliant

Details

Risk Assessment

Our EUDR risk assessment uses specific datasets and indicators to evaluate commodity plot risks.

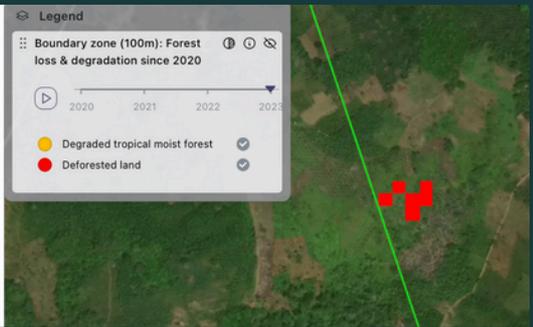
- **Perimeter Analysis:** Examines deforestation and degradation within 100 meters of the project boundary, determining if plot activities cause deforestation beyond the boundaries. Uses data from the Tropical Moist Forest dataset (2020-2024).
- **Nearby Deforestation:** Assesses if the project is within 5 km of a deforestation hotspot or significant forest loss area. Projects in these zones face increased scrutiny due to their potential impact on surrounding forests.
- Datasets for Indigenous territories and protected areas are critical for identifying whether activities within a region require additional permissions to meet legal standards.

Deforestation and degradation (within 100m from plot boundary)

Deforestation and degradation occurring at the plot perimeter (within 100m of the plot boundary) may indicate that the plot activities are responsible for deforestation or degradation outside of the plot boundaries.

It highlights any areas in the immediate project boundary that have undergone degradation and/or forest loss since 2020.

Deforestation and degradation detected in boundary
Boundary deforestation / degradation (100m) since 2020

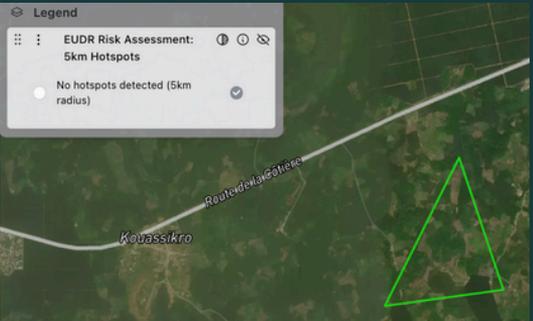


Deforestation hotspots (within 5 km radius)

Deforestation patterns within a 5km radius **AROUND** the plot, not the specific plot itself. This surrounding area analysis provides regional context about deforestation risks and, importantly, does not affect the overall EUDR compliance status. The tool identifies the following types of deforestation hotspots in the surrounding area:

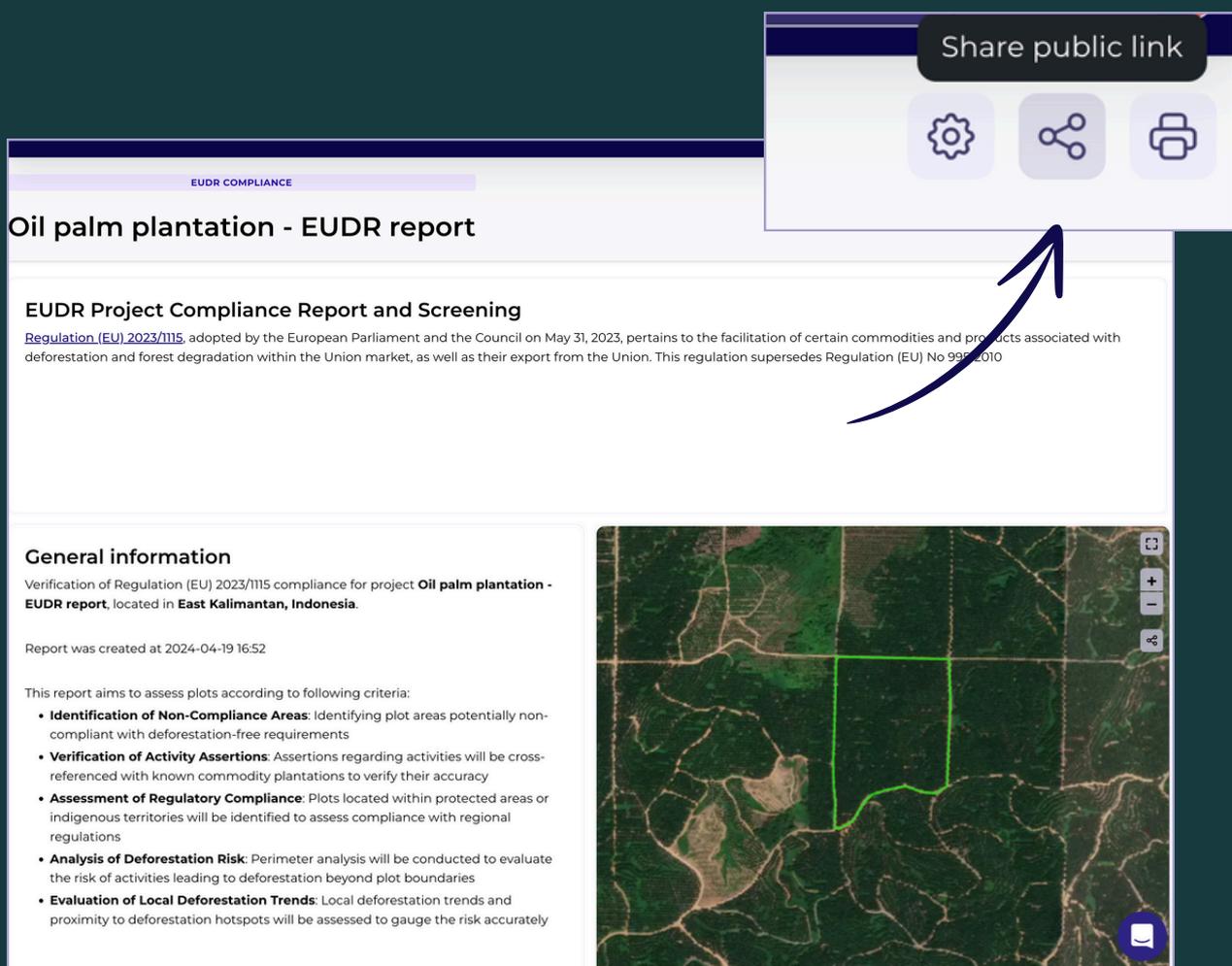
- New hotspots
- Sporadic hotspots
- Intensifying hotspots
- Persistent hotspots
- Diminishing hotspots

Remember: This is a [regional analysis tool](#) that helps understand the broader context and supports the risk assessment and due diligence processes. While a specific plot may be compliant, properties located near identified hotspots may receive additional scrutiny during compliance reviews.



Seamless Supplier Data Collection

With our platform you can easily gather data from your suppliers using a convenient and shareable link, ensuring efficient and accurate compliance data collection.



TRACES NT: DDS Creation and Submission

What is TRACES NT?

TRACES NT (Trade Control and Expert System New Technology) is the European Commission's established online platform for managing official control documents and traceability for a wide range of goods imported into or traded within the EU. It is particularly crucial for goods subject to sanitary and phytosanitary (SPS) requirements.

With the introduction of the EUDR, a new layer of compliance is required. The EUDR mandates that operators placing specified commodities and their derived products on the EU market, or exporting them, must submit a Due Diligence Statement (DDS). While TRACES NT handles many existing trade-related certifications, the EUDR DDS will be submitted via a new, dedicated EU Information System specifically developed for EUDR.

Orbify's EUDR compliance platform is engineered to simplify this complex regulatory landscape. Our solution focuses on two critical workflows for your business: comprehensive supplier and plot-level compliance assessment, and the efficient generation and submission of EUDR-compliant DDSs.

TRACES NT: DDS Creation and Submission

Orbify empowers you to:

- **Assess Supplier Compliance:** Consolidate all your supplier's plot data into a unified view, enabling ongoing risk assessment, deforestation monitoring, and proactive management of your supply chain.
- **Generate and Submit DDS for Shipments:** Easily combine information from multiple plots and suppliers to generate accurate, EUDR-compliant DDS forms. Orbify facilitates the submission of your DDS to the official EU Information System for EUDR. This means submitting to the new, specific EUDR system.
- The reference number generated from this submission ("DDS#") is critical for customs and will likely need to be cross-referenced in environments where TRACES NT is also used for other regulatory checks (e.g., SPS). Orbify will further assist by enabling you to monitor your DDS# and its status in relation to your shipments, ensuring smoother customs clearance and a holistic view of your compliance obligations.

In essence, while TRACES NT remains the backbone for many EU import controls, Orbify provides the specialized tools you need to navigate the distinct requirements of the EUDR, from plot-level assessment to preparing and managing the submission of your critical DDS to the appropriate EU system.

orbify



Website
www.orbify.com



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