



# **BRIDGING EUDR WITH FSC: A PASSPORT FOR COMPLIANCE AND MARKET ACCESS**

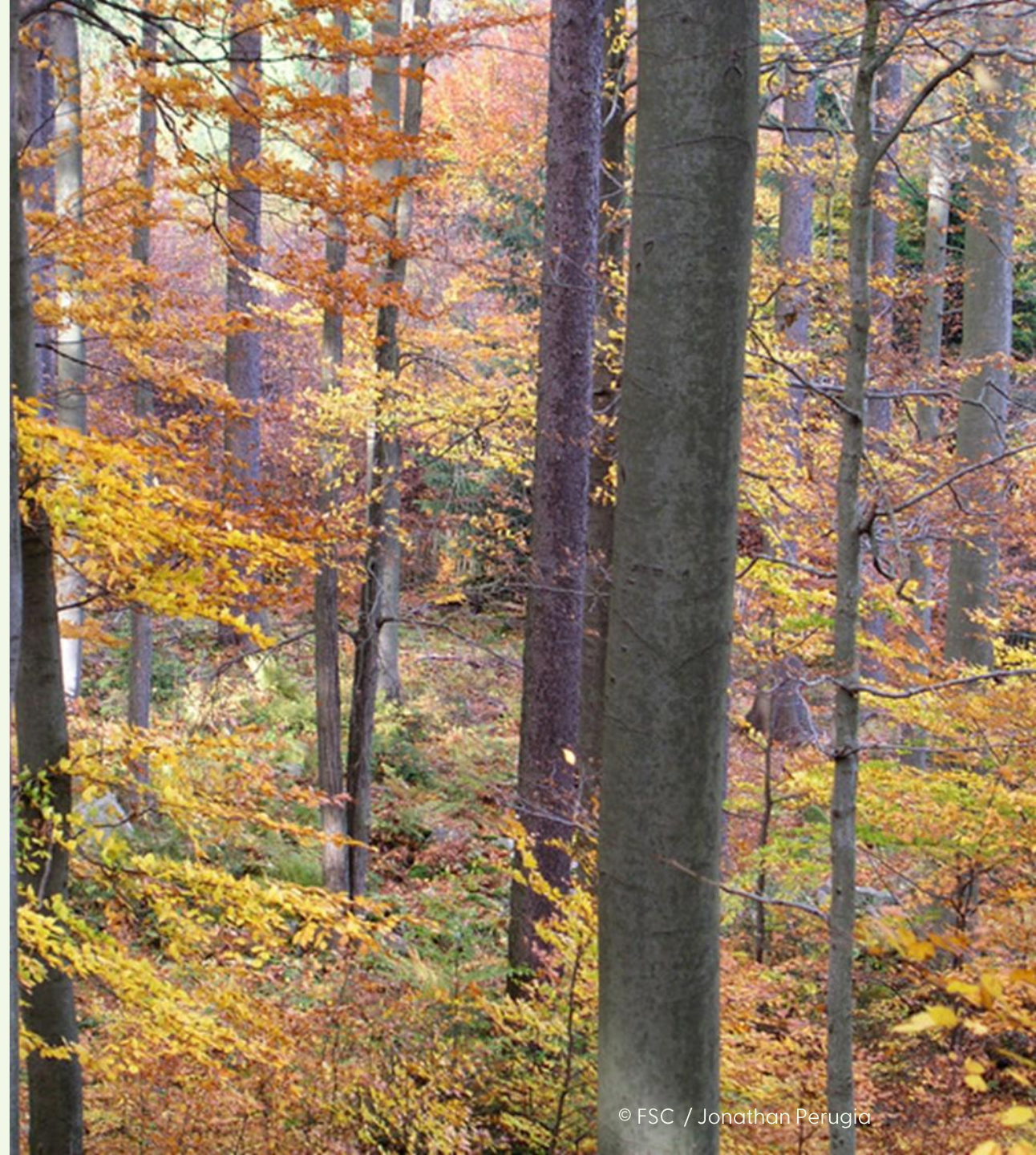
**Matteo Mascolo, Global Sustainability Policy Lead, Europe**

**FSC International**

**16.04.2026 - Ankara, Turkey**

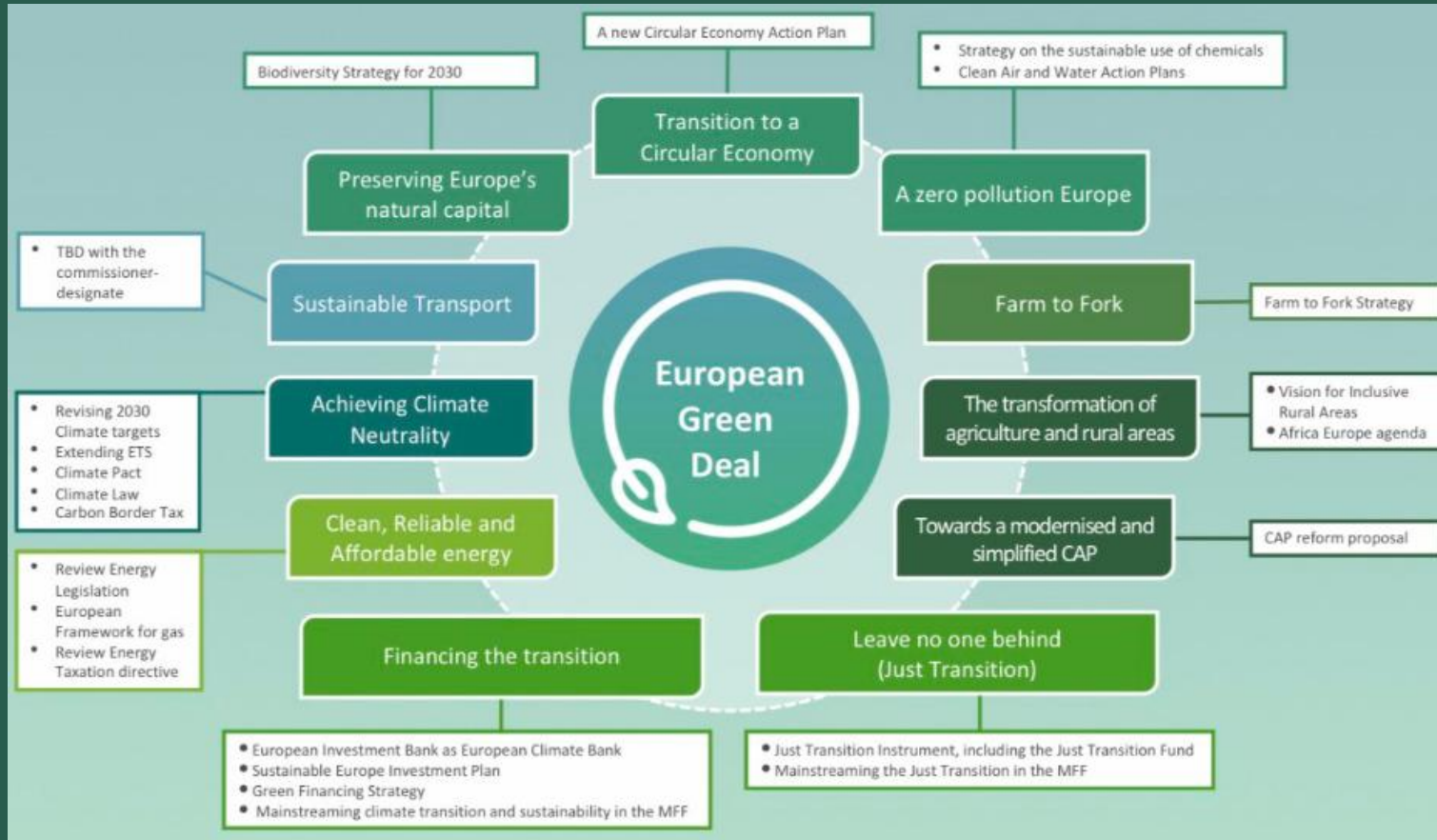
# Index

- 1 The global regulatory context
- 2 EUDR – why it matters for Turkish companies
- 3 The new EUDR and what to expect
- 4 EUDR & FSC
- 5 The added value of FSC



# 1. THE GLOBAL SUSTAINABILITY REGULATORY CONTEXT

# The EU Green Deal



## Takeaways:

- Mandatory and interconnected sustainability legislations
- Forests central in the EU policy agenda.
- **Catalyst** for sustainability legislations in Europe – and worldwide.

# Global forestry legislative initiatives



Australia's Illegal Logging Prohibition Amendment Act 2024



EU Regulation on Deforestation-free Products (EUDR)



EU Timber Regulation (EUTR)



Japan Revised Clean Wood Act



Korean Act on the Sustainable Use of Timbers



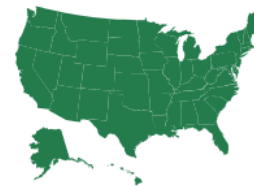
New Zealand Forests Amendment Act



Swiss Timber Trade Ordinance



UK Timber Regulations



U.S. Lacey Act

# The world in transition – what does sustainability mean?



## SUSTAINABILITY

**More green rules:** more ambition (EU Green Deal)  
**Implementation:** EUDR, Lacey Act, EU illegal logging act  
**Triple planetary crisis:** threats to address  
**Global obligations:** rising of corporate reporting



## RESILIENCE

**Reframing:** autonomy, security, resilience (clean energy)  
**Pressure:** consumers, climate shocks, regulations, geopolitics  
**Risk management:** risks and reputation to be managed  
**Market access:** Free trade agreements (MERCOSUR, etc.)



## COMPETITIVENESS

**Less rules:** diluting ambition  
**Simplification:** “omnibus”  
**Competitiveness:** Focus on economic angles  
**Harmonisation:** reporting obligations

What does sustainability mean?



**BUILDING SUPPLY CHAINS THAT  
ARE COMPLIANT, COMPETITIVE,  
AND RESILIENT.**

## 2. EUDR – HOW IT WORKS AND WHY IT MATTER FOR TURKISH COMPANIES

# EUDR: a long story, in short



# What is the EUDR?

EU Regulation on Deforestation-free Products (EUDR) is the new landmark EU law to minimize the EU's contribution to deforestation and degradation.

The EU wants to increase the demand for 'deforestation-free' and legal products.

**EUDR goals and FSC's mission are mutually reinforcing**

# Products within EUDR scope



Cocoa



Coffee



Soy



Palm oil



Cattle & beef



Rubber

MUST BE LEGAL &  
DEFORESTATION-FREE



Wood

Wood has additional requirements under EUDR:  
all wood products must be **legal, deforestation-free, degradation-free**

MUST BE LEGAL, DEFORESTATION-FREE AND  
DEGRADATION-FREE

# EUDR: EU regulation, global relevance

## Exports

41% of Türkiye's goods exports went to the EU in 2024.

**€210bn+**

total EU–Türkiye goods trade in 2024.

## Imports

**€98.4bn**

EU imports of goods from Türkiye in 2024.

**~\$8bn**

Furniture, paper and forest products exports, (Feb 2025–Jan 2026).

## EUDR-relevant product groups

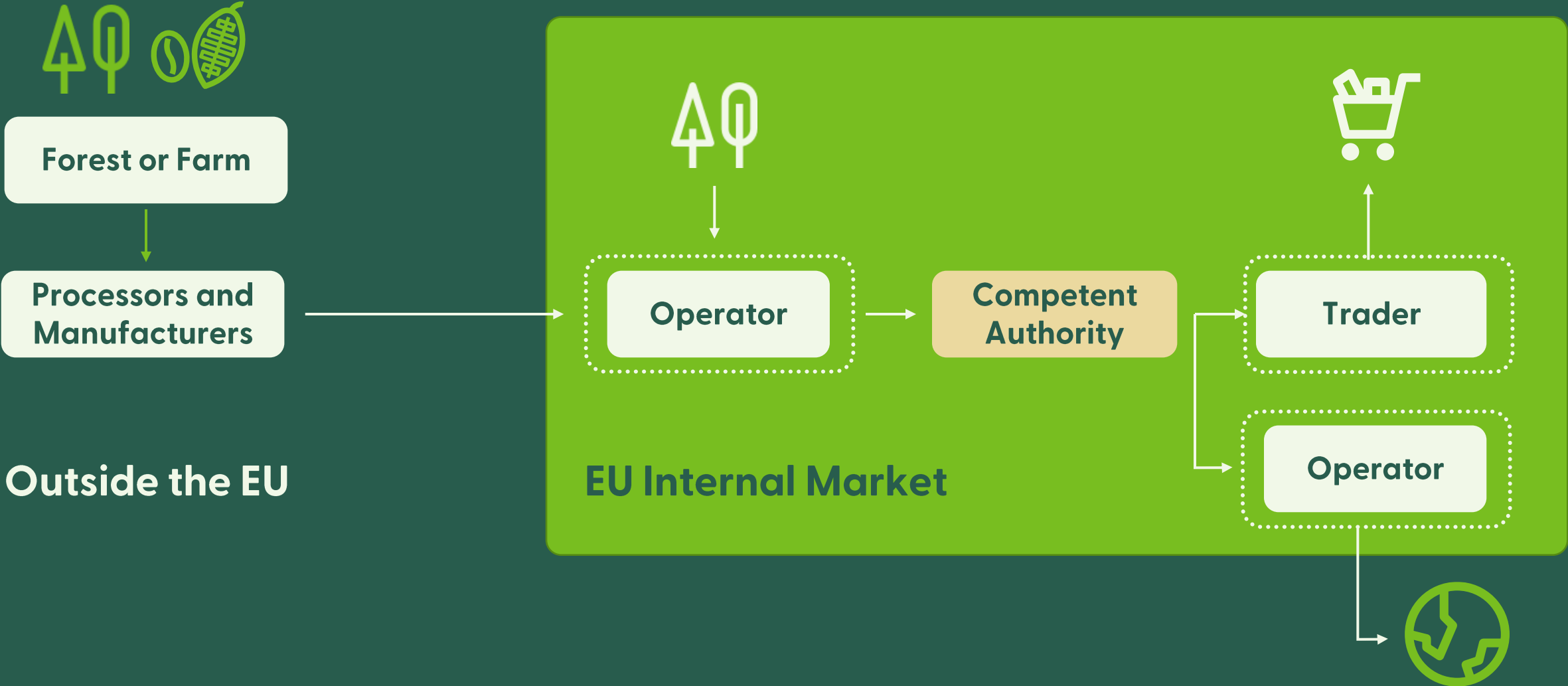
- **Wood** & wood-derived products
- **Furniture** and selected wood-based products
- Selected **paper, cardboard** and packaging products in *Annex I*
- Rubber-derived products, especially tyres

# EUDR main goals

1. The EUDR requires that selected commodities must be sourced **legally** and must come from a land that has **not been deforested** after **31 Dec 2020**.
2. Companies must **mitigate as much as possible the risks (due diligence)** of illegality and deforestation **before placing** or **exporting** the products in/from the EU market.



# EUDR main actors



# EUDR benchmarking & geo-location

## Assessing RISK



Risk benchmarking  
(by EU Commission)

Low

Standard

High

Simplified  
Due  
Diligence

- a. Risk assessment by operator
- b. Risk mitigation

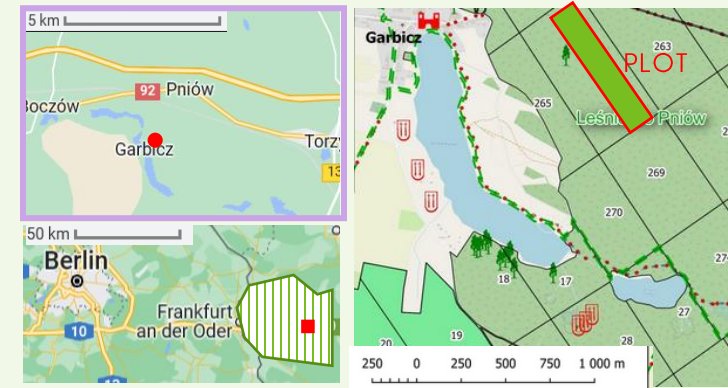


Information about supply chains



Information on supply chains, e.g.:

- Geo location of a plot
- Range/time of production



## Collecting DATA

# The role of certification schemes within the EUDR



- Certification schemes can be used to **support due diligence** duties.
- Schemes can be used if meeting **criteria in guidance document**
- **Companies' responsibility** checking to what **extent** schemes are **aligned** with the EUDR requirements
- The role of schemes will very much depend on whether the **EU Competent Authorities** will consider them **effective or not**.



# 3. EUDR – WHAT HAS CHANGED AND WHAT WE CAN EXPECT

# New EUDR scope



Cocoa



Coffee



Soy



Palm oil



Cattle & beef



Rubber

MUST BE LEGAL &  
DEFORESTATION-FREE



Wood

Books, newspapers, printed pictures are now **out of scope**.

Pulp and paper **still in scope**.

MUST BE LEGAL, DEFORESTATION-FREE AND  
DEGRADATION-FREE

# Overview obligations

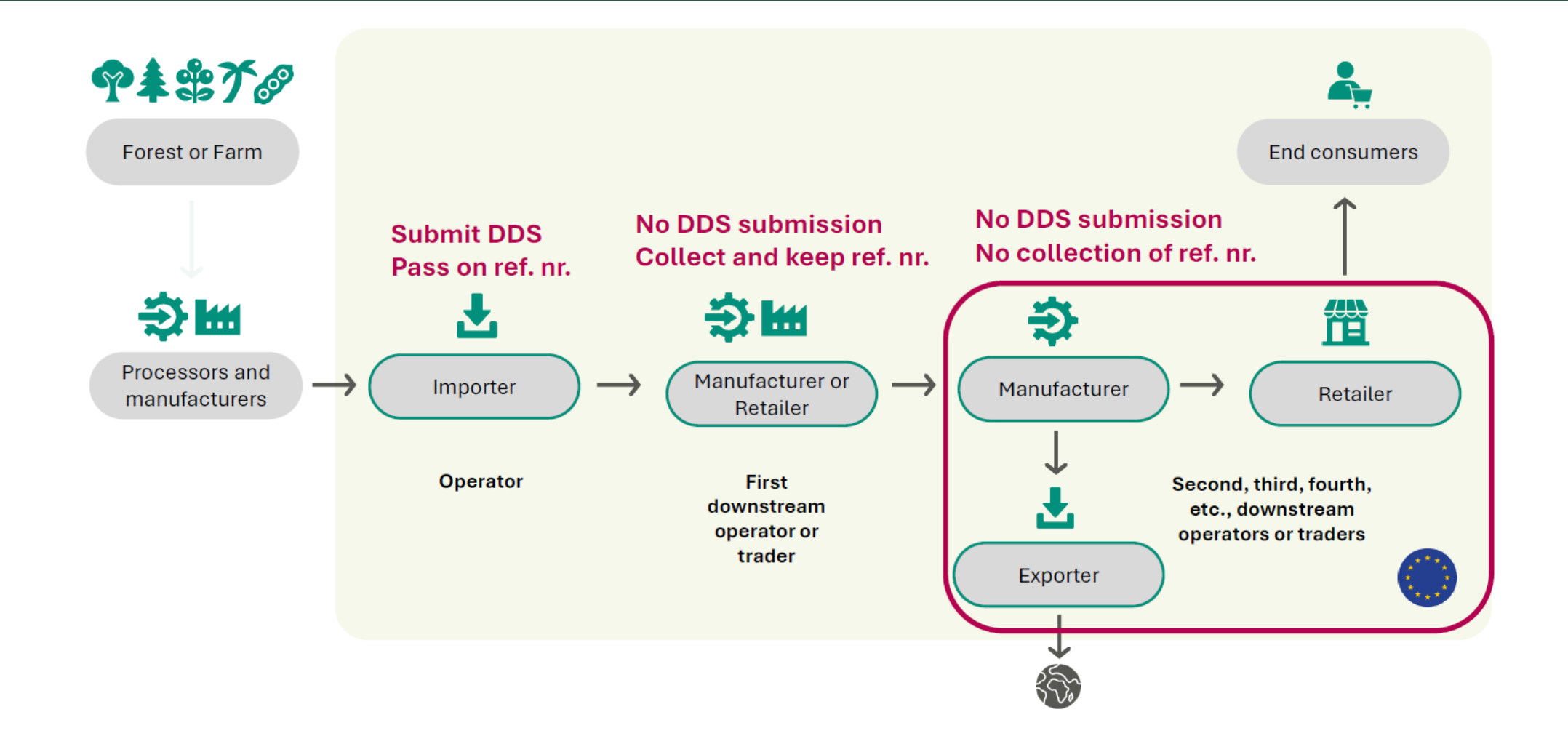
Company role	Action	Applicable Products	Due diligence obligations	Engage with the Information System	Responsibility for compliance in relation to due diligence	Action when information suggests product non-compliance	Record keeping requirement	Communicate DDS reference number or declaration identifier to downstream operators/traders	Public reporting requirement
Upstream operator	Places on or exports from Union market	Relevant products	✓✓ Exercise Art. 4(1)	✓✓ Submit DDS Art. 4(2)	✓✓ Assume and retain Art. 4(3) and 6(1)	✓ Inform (Art. 4(5))	✓✓ Keep record of DDS Art. 4(3)	✓✓ Art. 4(7)	✓✓ Art. 12(3) <sup>3</sup>
Upstream micro or small primary operator (MSPO)	Places on or exports from Union market	Relevant products that the operator itself has grown, harvested or obtained from or raised on relevant plots of land <sup>1</sup>	✓✓ Exercise Art. 4(1)	✓ Submit one-time simplified declaration Art. 4a(2)	✓✓ Assume and retain Art. 4(3) and 6(1)	✓ Inform (Art. 4(5))	✗	✓✓ Art. 4(7)	✗
First downstream operator or trader (non-SME)	Places on or exports from Union market (operators) or makes available on the Union market (traders)	Relevant products <sup>2</sup>	✗	✓ Register Art. 5(2)	✗	✓✓ Inform and verify (Art. 5(6)) <sup>4</sup>	✓✓ Collect and keep incl. DDS reference number / declaration identifier Art. 5(3) (4) and recital 6	✗	✗
First downstream operator or trader (SME)	Places on or exports from Union market (operators) or makes available on the Union market (traders)	Relevant products <sup>2</sup>	✗	✗	✗	✓ Inform (Art. 5(5))	✓✓ Collect and keep incl. DDS reference number / declaration identifier Art. 5(3) (4) and recital 6	✗	✗
Subsequent downstream operator or trader (non-SME)	Places on or exports from Union market (operators) or makes available on the Union market (traders)	Relevant products <sup>2</sup>	✗	✓ Register Art. 5(2)	✗	✓✓ Inform and verify (Art. 5(6)) <sup>4</sup>	✓ Collect and keep Art. 5(3) (4) and recital 6	✗	✗
Subsequent downstream operator or trader (SME)	Places on or exports from Union market (operators) or make available on the Union market (traders)	Relevant products <sup>2</sup>	✗	✗	✗	✓ Inform (Art. 5(5))	✓ Collect and keep Art. 5(3) (4) and recital 6	✗	✗

# EUDR: the new main actors



<b>(Large) downstream operators and traders</b>	<b>Micro and small primary operators</b>	<b>Overarching</b>
Those who place or export products that are <b>already covered by DDs</b> .	EU/non-EU operators that grow/harvest <b>products themselves</b>	<b>Timeline</b> adjusted. Companies: 30 Dec <b>2026</b> . SMEs: 30 June <b>2027</b> .
No <b>obligations exercise DD/or ascertain the DD was exercised</b>	Only for <b>low-risk countries</b> and <b>directly placing/exporting</b> the products	Review pushed till <b>2030</b>
No <b>obligation to submit DDs</b> or pass reference numbers.	One off <b>simplified declaration</b> submitted in the EU IT system	<b>EUTR repeal</b> adjusted. 31 Dec 2019.
Still required to register in <b>the EU IT system to ensure traceability</b> . Limited liability if aware non-compliance risks.	<b>No declaration needed</b> if information already available in EUDR IT system or other national database.	

# EUDR main actors



# EUDR due diligence statement sample



Status : AVAILABLE		Due Diligence Statement		Created on : 12/11/2025 13:20:11	
A	1. Reference Number 25NL6MHR153572	2. Activity IMPORT			
	Company Internal Ref REF-000000934				
B	3. Operator/Trader name and address				
	Name Master Sustainability	Address Hofplein 20,3033 Rotterdam			
	Country Netherlands	ISO Code NL	EORI BE123345		
	4. Authorised Representative				
	Name Sustainability Master	Address Hofplein 20,3036 Rotterdam			
	Country Netherlands	ISO Code NL			
	6. Commodity(ies) or Product(s)				
C	(1) 12 OIL SEEDS AND OLEAGINOUS FRUITS; MISCELLANEOUS GRAINS, SEEDS AND FRUIT; INDUSTRIAL OR MEDICINAL PLANTS; STRAW AND FODDER				
	- 1201 Soya beans, whether or not broken				
	Commodity(ies) or Product(s) Description	Net Mass (Kg)	% Est. or Deviation	Supplementary Units	
	Soytest	20000.0			
	Scientific Name		Common Name		
	Glycine max		Soy beans		
	Producer Name		Country of Production		
test		Belgium			
D	Last changes				
	EUDR Status	Date	User		
	Creation date	07/10/2025 14:33:41 +0200			
	Submission Date	07/10/2025 14:43:04 +0200	EUDR Support		
	Amend cutoff date	10/10/2025 14:45:01 +0200			
Available date	07/10/2025 14:45:01 +0200				

## Information likely to be requested

1. Collect information (legality)
2. Geo-location and CoC
3. Complexity of supply chain
4. Risk of circumvention
5. Risk of mixing products
6. Risk assessment
7. Risk mitigation

# EUDR review package

## 1 Annex I

- New products in scope: instant coffee, palm oil soap
- Delegated act – 4 weeks consultation.

## 2 FAQs

- Downstream operator (only if receives DDS number + 5 years)
- Importing = upstream operator
- When exporter acts as an operator, they must include the DD declaration number in the customs declaration

## 3 Guidance document

- Clarifying legality requirements (more risk based)
- Benchmarking not set to revised in April

## 4 “Chapeau” report

- Summarising changes thus far
- Summary burden for companies

## 5 Information system

- Changes in light of the new roles

# 4. EUDR & FSC

# FSC has supported EUDR since the start

## As of September 2025



### Supporting materials

- 2 microsites
- 10+ webinars
- 6 web pages
- 50+ informative materials
- 34+ videos
- 25 news items
- 13+ slide decks and adaptations
- 50+ B2B social posts



The EUDR Early Adopter Programme has helped us to fully appreciate the scope of the EUDR process and provided us with an excellent template to work from.

HELENA ARNOLD  
Panda Panel Agencies Ltd.

# FSC Aligned for EUDR: Solutions to support different compliance aspects

## FSC Aligned for EUDR



# FSC Certification is recognized as a strong foundation for EUDR compliance



## Independent assessment by ASI shows FSC's strong alignment with EUDR:

- ✓ FSC Regulatory Module brings companies into full alignment with EUDR
- ✓ Deforestation-free supply chains
- ✓ Independent, third-party verification
- ✓ Framework for assessing and mitigating risk

## Minor gaps remain, mainly temporary:

- Minor gaps remain, mainly temporary, linked to ongoing normative framework revisions
- Once the transition is completed, FSC's core cert. will mostly align with EUDR
- FSC Regulatory Module ensures **full EUDR alignment**
























## SUMMARY OF FSC'S ALIGNMENT WITH THE EUDR GUIDANCE DOCUMENT

Categories	Criterion	Core Cert.	Reg Mod
<b>1</b> <b>The relevant standards</b> Are FSC rules aligned with EUDR?	1.1 Certificate validity & scope	● ● ● ●	● ● ● ●
	1.2 Legal compliance & cut-off date	● ● ● ●	● ● ● ●
	1.3 Risk assessment (legality & deforestation)	● ● ● ●	● ● ● ●
	1.4 Traceability & geolocation	● ● ● ●	● ● ● ●
	1.5 Mixing rules	● ● ● ●	● ● ● ●
	1.6 Mass balance prohibition	● ● ● ●	● ● ● ●
	1.7 Conclusive Evidence	● ● ● ●	● ● ● ●
<b>2</b> <b>Implementation</b> Are they applied effectively?	2.1 Governance Transparency	● ● ● ●	● ● ● ●
	2.2 Public Database Access	● ● ● ●	● ● ● ●
	2.3 Independent Checks	● ● ● ●	● ● ● ●
	2.4 Origin Control	● ● ● ●	● ● ● ●
	2.5 Volume Verification	● ● ● ●	● ● ● ●
	2.6 Clear claims & labels	● ● ● ●	● ● ● ●
	2.7 Scheme Issue Reports	● ● ● ●	● ● ● ●
	2.8 Producer Issue Reports	● ● ● ●	● ● ● ●
<b>3</b> <b>Governance</b> Is the system credible and transparent?	3.1 Conflict of Interest	● ● ● ●	● ● ● ●
	3.2 Fraud Controls	● ● ● ●	● ● ● ●
	3.3 ISO Compliance	● ● ● ●	● ● ● ●
	3.5 Sanctions & Corrective Actions	● ● ● ●	● ● ● ●
	3.6 Stakeholder Inclusion	● ● ● ●	● ● ● ●
	3.7 Auditor Independence	● ● ● ●	● ● ● ●

**Legend:**

- Fully aligned
- Mostly aligned
- Partly aligned
- Not aligned
- Fully aligned when transition complete

# FSC Certification: Beyond EUDR Compliance

	Criterion		<b>EUDR</b> 		<b>FSC</b> 
	<b>Indigenous Rights</b>		EUDR requires FPIC <b>only if it is part of national law</b> (Art. 3c, FAQ v4).		<b>FPIC</b> is a <b>mandatory</b> , auditable requirement in all FSC-certified forests.
	<b>Worker Rights</b>		Not included		FSC upholds <b>ILO Core Conventions</b> ensuring labor protections, including CoC.
	<b>Communities engaged</b>		Not included		FSC requires <b>stakeholder engagement</b> in forest management decisions and <b>dispute resolution mechanisms</b> .
	<b>Conversion Prevention</b>		Forest-to-agriculture only; <b>other types not included e.g., mining</b>		FSC <b>prohibits all types of conversion of</b> natural forests and HCV areas, regardless of end use.
	<b>Ecosystems protection/restoration</b>		Protection of existing forests (deforestation-free and degradation-free), but <b>no restoration strategies</b>		FSC <b>mandates protection and restoration</b> of biodiversity, soil, water, and ecosystem services.
	<b>High Conservation values (HCVs)</b>		Not included		FSC <b>integrates HCVs</b> into forest management plans and risk assessments.
	<b>Auditing</b>		1-4% of companies are audited by national competent authorities		<b>All certified companies are audited</b> once per year by an independent auditor

# The role of CAs – the Dutch model



## Current potential cooperations for EUDR

Expressed interest	In acceptance process	Accepted	Cooperation
			

6

1. Avoid **duplication** efforts
2. Promoting **efficiency**
3. **Synergies** between public-private
4. Boosting **transparency**/info sharing
5. Risk-based supervisions – **certified batches likely less checks** (yet not “green lane”)

# 5. THE ADDED VALUE OF FSC

# Forest Stewardship Council: A holistic solution supporting EUDR and beyond



A comprehensive  
flexible  
framework



Environmental and  
social safeguards



Legality and  
sustainability



Forest solutions:  
Trace, risk  
assessment



Integrity,  
assurance, trust,  
acceptance

All built on independent, third-party verification

One final message



**FSC IS MORE THAN A CERTIFICATE:  
IT IS A STRATEGIC TOOL – FOR  
COMPLIANCE, TRUST, MARKET  
ACCESS**

An aerial photograph of a vast forest in Maramures, Romania, during autumn. The trees are in various stages of color change, with some showing bright yellow and orange, while others remain dark green. The forest extends to the horizon, with rolling hills and mountains visible in the distance under a soft, hazy sky.

# THANK YOU

**Matteo Mascolo**

**Forest Stewardship Council®  
FSC® Global Development**

Adenauerallee 134, 53113 Bonn, Germany

T +49 (0) 228 367 66-0

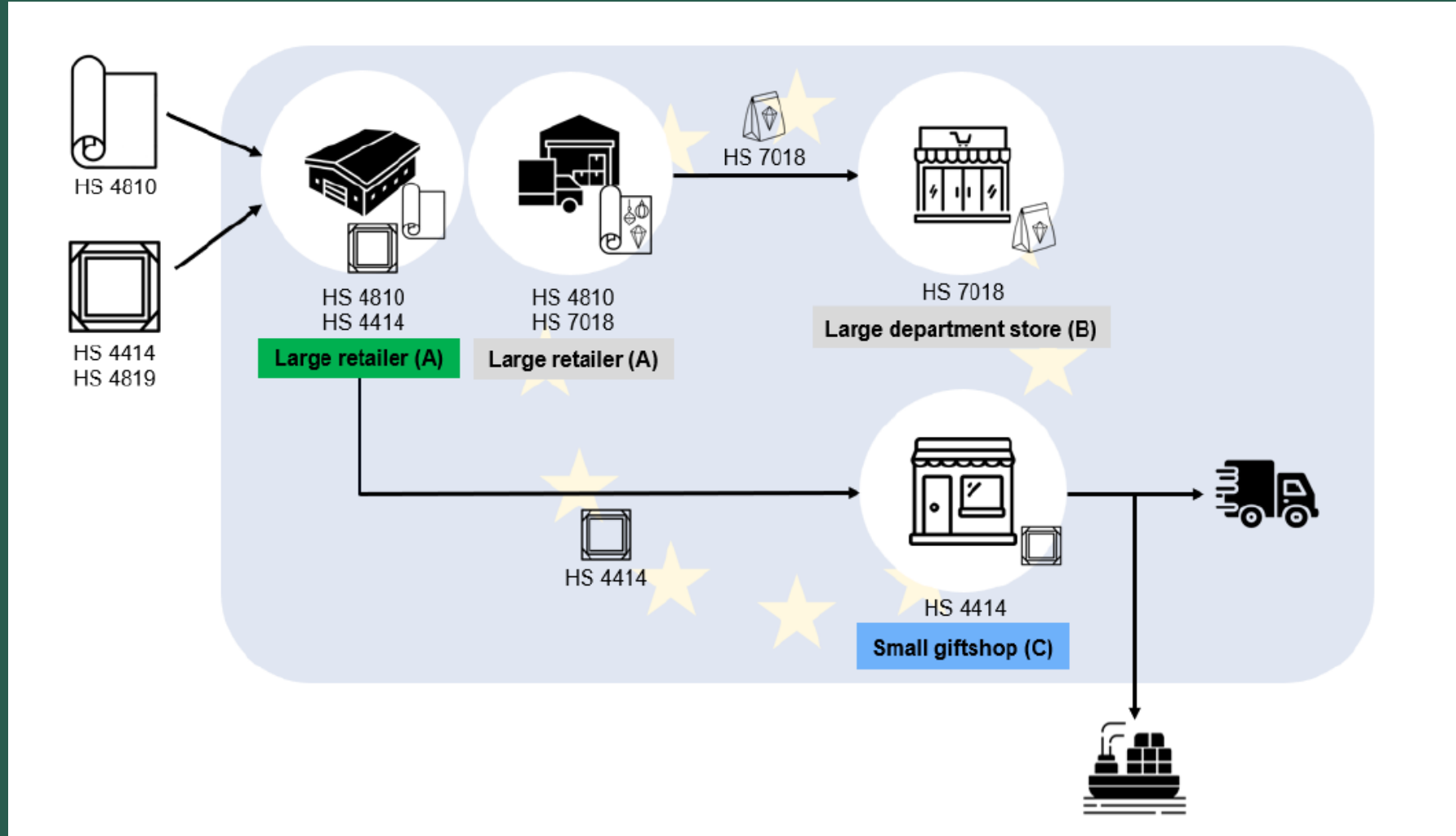
F +49 (0) 228 367 66-65

FSC Global Development © All rights reserved

FSC® F000100

**[www.fsc.org](http://www.fsc.org)**

# How the new EUDR could work



# EUDR definitions



## DEFORESTATION

---

Conversion of forest to **agricultural** use, whether human-induced or not.



## DEGRADATION

---

**Structural changes to forest cover** taking the form of the **conversion** of:

- primary forests/naturally regenerating forests into plantation forests/other wooded land
- primary forests into planted forests



## LEGALITY

---

Respect of **relevant laws in the Country of production**, e.g.:

- Legislation in the country of production
- Indigenous Peoples' rights
- Land use rights
- Forests regulations
- Human rights
- **Free Prior Informed Consent (FPIC)**
- Trade and custom regulations

# FSC RISK ASSESSMENT UPDATE

# FSC Risk Assessments are being updated



## Reasons for Updates:

- Stakeholder feedback
- Policy alignment (e.g., FSC's Policy to Address Conversion)
- Alignment with new regulations (e.g., EUDR)

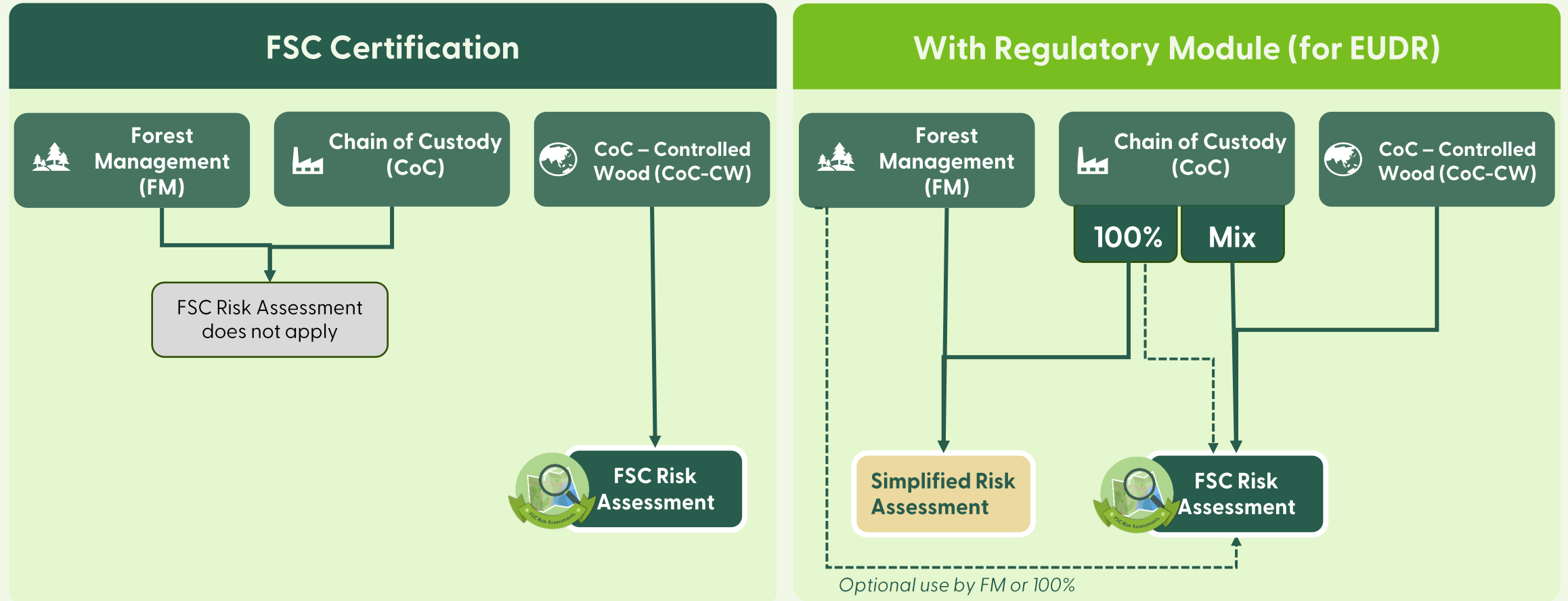
## Goals of Updates:

- Integrity and stability,
- Consistency,
- Clarity and precision,
- Regulatory compliance support.



# FCS Risk Assessments: Application in the FSC system and for regulations

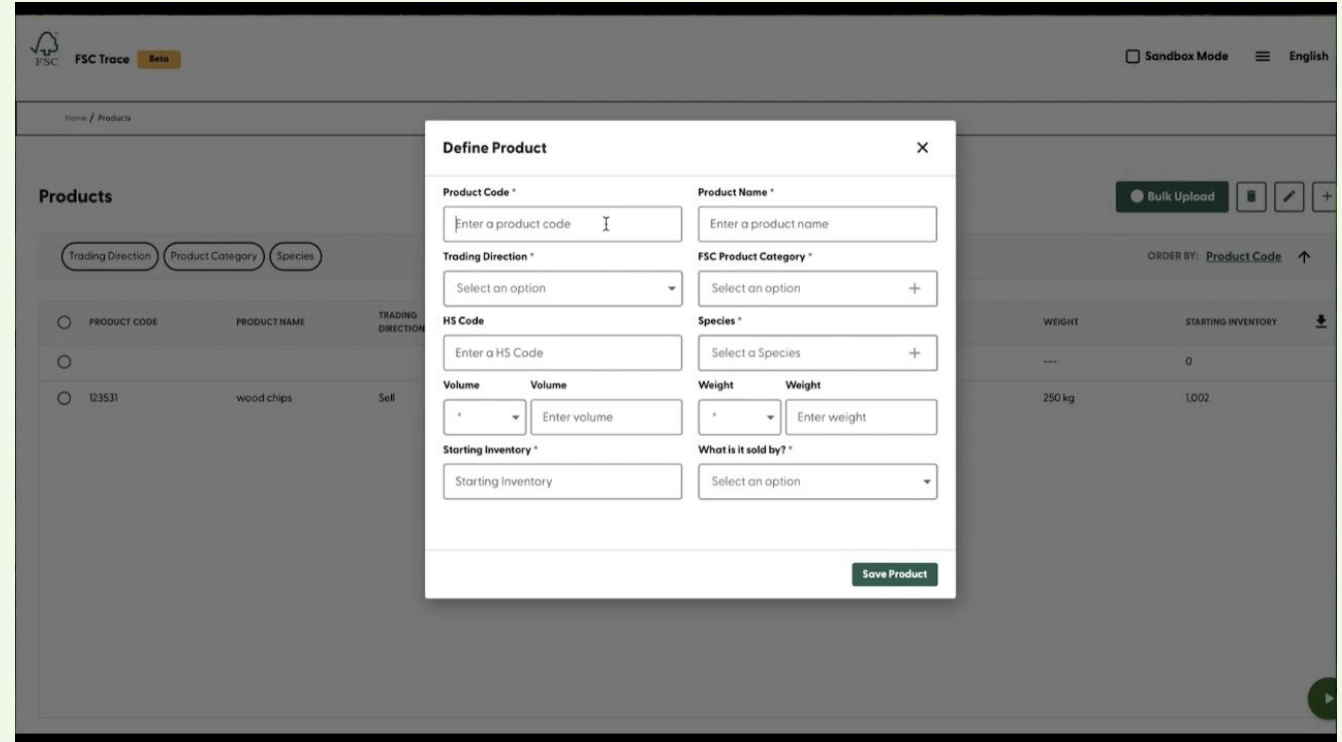
Application of updated FSC Risk Assessments (simplified)



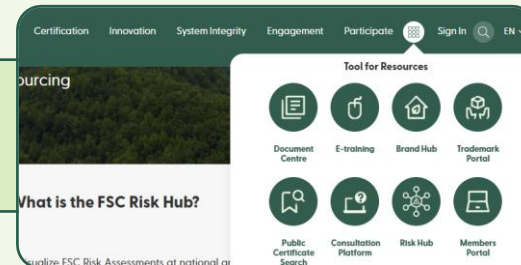
# FSC Trace is now available to certification holders



- FSC Trace is **now accessible** through the FSC Connect platform to all **certificate holders** with a signed eTLA
- **Core features available**, refinement and expanded functionality throughout 2026 and beyond
- Interface and self-onboarding material available in English, French, Spanish, Mandarin & Google translate plug-in



Access through the app palette on FSC connect



# Traceability enabled by FSC



FSC Trace

## Transparent & secure

Enhanced traceability with matching transactions and direct control over sensitive data.



## Automated checks

Real-time validation on certification licence and product data of trading partners.



## Integrity enhancement

Validated, tamper-proof transaction data, reduces risk and helps to spot discrepancies earlier.



## User-friendly design

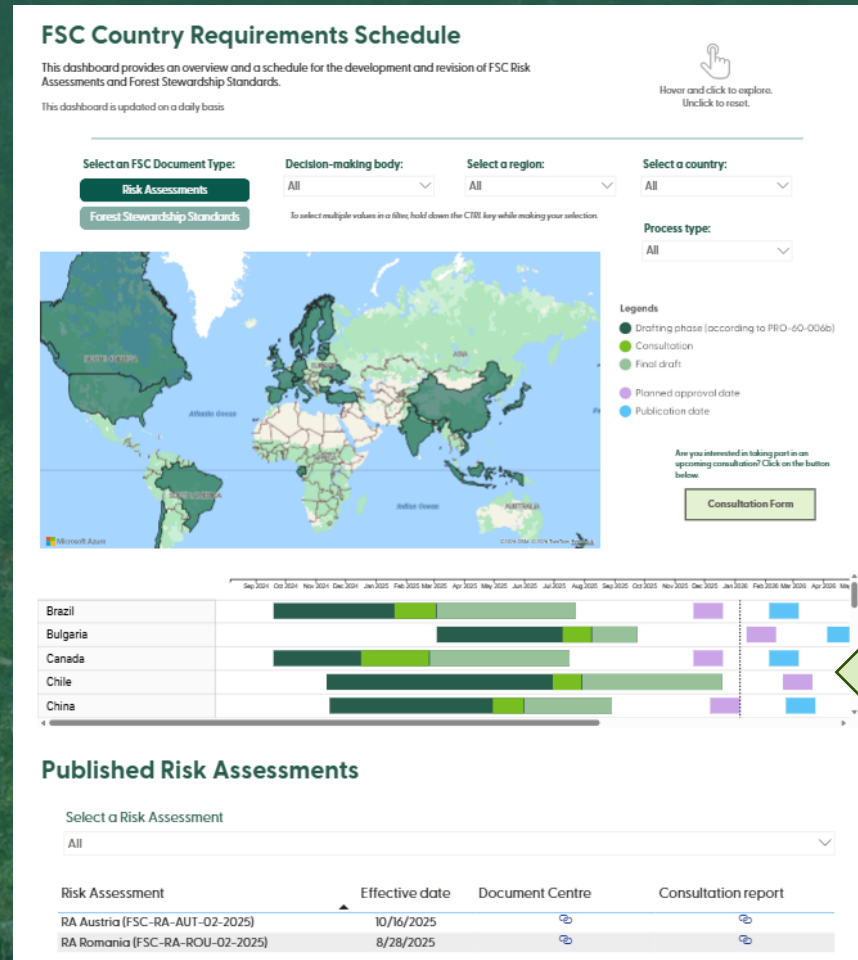
Bulk upload via Excel template and API-connection available to integrate to existing workflows.



# FSC Risk Assessment development is underway

Dashboard on **FSC Connect** to track progress.

Sign up to **stay informed** on upcoming consultations.



2 countries finalized, 31 in progress



For more information – [FSC Country Requirements Schedule](#) | [FSC Connect](#)

# What is FSC Trace

FSC Trace is a secure **traceability platform** designed to **share and verify transaction data** within FSC supply chains.

## FSC Trace enables to:

- ✓ Securely exchange data in the supply chain
- ✓ Check FSC conformity of materials in real time
- ✓ Supports verification, due diligence & regulatory compliance

