

Implementing the EU Deforestation Regulation

The role of voluntary certification

Brussels, 13 May 2026

Authors

- Samy Porteron, Senior Programme Manager – ECOS samy.porteron@ecostandard.org
- Martina Forbicini, Programme Officer – ECOS martina.forbicini@ecostandard.org

Acknowledgements

- Based on research from: Laura Väyrynen, Programme Manager – ECOS.

Contents

| | |
|--|----|
| Executive summary | 2 |
| Introduction..... | 3 |
| Key recommendations | 3 |
| Context..... | 6 |
| Methodology, scope, and limitations of this paper..... | 7 |
| Findings: How schemes are responding to the EUDR..... | 9 |
| Systemic risks and limitations of relying on VSS for EUDR due diligence... | 14 |
| Conclusions..... | 19 |
| References | 20 |

Executive summary

Voluntary Sustainability Standards (VSS, or schemes), which provide third-party certification and other checks against social and environmental sustainability criteria, have become widely used tools to assess and demonstrate supply chain sustainability in sectors exposed to deforestation and forest degradation risks. Yet they present limitations in supporting compliance against the requirements of the EU Deforestation Regulation (EUDR).

This report examines the role, performance, and governance of VSS in the context of EU due diligence obligations under the EUDR. The review focused on the following schemes:

- Bird-Friendly Coffee
- Certified Responsible Soya
- Fairtrade International
- Forest Stewardship Council (FSC)
- International Sustainability and Carbon Certification (ISCC)
- Programme for the Endorsement of Forest Certification (PEFC)
- ProTerra
- Rainforest Alliance
- Roundtable for Sustainable Palm Oil (RSPO)
- Sustainable Biomass Program (SBP)

The review shows that the schemes differ widely in their standards and services for traceability, geolocation tracking, risk assessment, and treatment of mixed products. Consequently, VSS support to companies in complying with EUDR obligations was found to differ.

The certification landscape faces structural challenges: practices such as mass balance which obscure traceability; inconsistent auditing practices; limited oversight of accreditation bodies; and conflicts of interest linked to commercial auditing structures. In the absence of strong governance, VSS fail to provide credibly independent verification of deforestation, ecosystem conversion, and other environmental harms. While the European Commission's EUDR Guidance¹ already clarifies that certification cannot provide a green lane for compliance, further clarity at national and EU level is still needed to avoid misunderstanding or over-reliance on certification.

To address these gaps, we propose a series of recommendations for companies, operators, policymakers and VSS. These include prohibiting mass balance models, strengthening auditing and accreditation requirements, harmonising definitions across legislation and standards, and ensuring that legal and certification covers all ecosystems at high risk of conversion, not only forests. Clearer guidance on the appropriate and limited role of VSS in due diligence processes is essential.

Ultimately, certification can play a supportive role in Europe's environmental and climate ambition, but only within a regulatory framework that ensures integrity, transparency, and environmental protection. To avoid burden shifting and ensure that markets do not further destroy nature, policymakers must set clearer rules, and certification schemes must raise their standards to higher environmental ambition and continuously improve their tools and processes.

Implementation of the EUDR has been postponed by 12 months to 31 December 2026, with ongoing political discussions creating uncertainty around its final scope. This uncertainty does not change the Regulation's core objectives or operators' responsibilities, and many actors are already preparing for compliance. Timely and full implementation remains critical to avoid continued deforestation risks and market instability.

Introduction

The European Union's consumption and trade patterns are a major driver of global deforestation and forest degradation. Although the EU represents only a small share of the world's population, its demand for commodities such as cattle, wood, cocoa, soy, palm oil, coffee and rubber is linked to a disproportionate share of forest loss embedded in international trade. Within the EU, remaining primary and old-growth forests are rare, fragmented and insufficiently protected.

The EU Regulation on deforestation-free products (EUDR) is the Union's flagship response to this footprint. It aims to ensure that certain commodities and derived products placed on or exported from the EU market are deforestation-free, produced in accordance with relevant legislation in countries of production, and covered by a due diligence statement. Voluntary sustainability schemes (VSS), or certification schemes, are explicitly recognised in the Regulation and the European Commission guidance as potential sources of information for risk assessment and traceability.¹ They are therefore widely perceived by companies as a key part of the emerging compliance architecture.

This paper examines how far VSS can support EUDR implementation, and where their limits lie. It focuses on schemes that already play a significant role in the commodities covered by the EUDR and that have publicly communicated adjustments to their systems in response to the Regulation.

Key recommendations

Use certification as only one aspect of a complete, due diligence strategy and legal framework

EUDR compliance applies to all raw materials entering a supply chain, and operators remain accountable for verifying that every component is legal and deforestation-free. While voluntary sustainability schemes may provide useful information, they legally cannot replace operators' responsibilities.

Operators and competent authorities should verify legality, traceability, and geolocation accuracy of claims.

This report's own assessment confirms that schemes do provide interesting tools, but their effectiveness is still to be tested and the inherent challenges the schemes face in providing assurances mean operators should still conduct additional independent checks and risk assessments to ensure they are not incidentally involved in trading illegal products. This includes verification of Free and Prior Informed Consent (FPIC), land rights, tax compliance, and other legal aspects that VSS may be unable to assess fully.

Competent authorities and policymakers should provide clear guidance and regulation of certification schemes' roles and processes.

- **Clarify expectations for VSS in the context of due diligence.** The European Commission Guidance Document for the EUDR¹ already helps clarify the possible role of schemes in supporting compliance: certification does not provide a 'green lane' for customs checks. National rules and guidelines should also specify that certification is not a substitute for due diligence.
- **Strengthen oversight of auditing and accreditation.** Policymakers should examine the governance and independence of certification systems, target conflicts of interest, and consider minimum requirements for auditing of EUDR-relevant data.
- **Enforce prohibitions on the use of mass balance for EUDR compliance claims.** Given the high risk of non-compliant material entering supply chains through mixing, policymakers should ensure that only supply chains which ensure physical segregation and identity preservation can claim EUDR compliance.

Schemes and competent authorities should establish communication channels and collaboration to support law enforcement.

Cooperation with competent authorities, including secure access to EUDR-relevant information strengthens authorities' ability to detect inconsistencies in declared origins, identify certificate misuse, and refuse non-compliant shipments. Collaboration can include developing joint procedures for information-sharing and handling of suspected non-compliance. These channels should allow customs and surveillance authorities to request geolocation data, legality documentation, audit summaries, and volume records when verifying shipments.

Schemes and competent authorities should support smallholders and SMEs.

Producers with limited resources often face challenges generating geolocation data, documenting legality, and demonstrating land-use history. Training, capacity-building, and access to financial and technical resources for certification can reduce the risk of non-compliance and exclusion from supply chains.

Use volume tracking to limit risks related to product mixing

This report's review of VSS shows that while some schemes are beginning to integrate digital volume-tracking tools, coverage remains uneven and often limited to certified inputs only. Fraud can go unnoticed when uncertified material can be mixed with certified material. Reliable volume tracking would be a simple step to improve the credibility of due diligence systems. Without clear accounting of inputs and outputs at each supply-chain step, operators face a heightened risk of discrepancies, false claims, or the laundering of non-compliant material into certified flows. Mandatory volume tracking across all supply chains, including non-certified fractions, provides a basic level of control to identify inconsistencies early, prevent fraudulent mixing, and support competent authorities during checks.

Operators should prioritise schemes with clear guidance on traceability, mixed products and the treatment of non-certified fractions.

Where mixing occurs, operators benefit from schemes that explain how non-certified inputs are assessed and how this relates to EUDR requirements, reducing ambiguity in due diligence. Schemes that support identity preservation and physical segregation of products allow operators to better assure EUDR compliance.

Schemes should clarify and regulate the treatment of mixed products.

Clear and prescriptive expectations on how certified and non-certified material may be combined eliminate ambiguity and prevent loopholes in supply chains. Explicit rules on traceability, separation, and verification of the non-certified fraction limit the risk of deforestation-linked or illegal material entering EUDR-aligned flows. Stronger guidance also helps avoid misuse of mass-balance systems and ensures that operators understand the safeguards required when mixed products are placed on the EU market.

Policymakers should introduce mandatory volume tracking for certified and non-certified materials.

Volume tracking has been identified as a simple accounting tool to prevent artificially inflated volumes of falsely certified or illegal material. Volume tracking across all operators in the chain would ensure that volumes match along the supply chain and thus strengthen fraud detection, supporting competent authorities.

Ensure progress towards a more complete and credible VSS service offer to help prevent deforestation and forest degradation

As discussed in this report, the coverage of relevant due diligence processes which VSS offer varies from one scheme to another, creating a patchwork of solutions depending also on the product supply chain. The following recommendations aim at improving the effectiveness and adequacy of schemes to support EUDR compliance, the credibility of auditing practices, traceability tools, and risk mitigation systems.

Schemes should drive continuous improvement of their services.

Schemes' services can help reduce compliance risks for operators and contribute more reliably to preventing deforestation and forest degradation. Achieving this objective requires credibility and practical usefulness of tools, as well as transparency and robustness of assurance systems. Continuous improvement is essential to avoid regulatory misalignment and ensure that certification remains a trustworthy and relevant component of responsible supply chains.

- **Align standards, add-ons, definitions and digital tools more closely with the EUDR.** Our assessment shows that schemes do not always align well with the EUDR requirements. Stronger alignment enables operators to use scheme data more effectively for compliance. Key areas include geolocation requirements, legality verification, traceability functions, and risk assessment tools covering both certified and mixed material.
- **Take adequate measures to improve the quality of audits and strengthen independence.** Third-party certification and auditing lose value and credibility when conflicts of interest and blatant auditing oversights enable compliance loopholes, while still delivering or maintaining misleading labels and certification. Measures such as random auditor assignment, surprise audits, stronger auditor training, and mechanisms that generally prevent audit shopping, altogether help reduce conflicts of interest and improve audit reliability. Ensuring the transfer of information when an auditor or certification body changes also avoids the loss of critical information concerning operators' compliance history, enabling new auditors to take adequate measures and decisions in light of the information recorded.
- **Enhance transparency of audit results and compliance information.** Publishing audit summaries, reporting non-conformities, and disclosing revoked certificates increases confidence in certification and accountability. Transparency over procedures, such as satellite monitoring and risk-scoring methods also support operators' choices while enabling feedback and continuous improvement from independent reviews.

Operators and competent authorities should continuously review schemes' credibility and adequacy for EUDR compliance.

We recommend companies and authorities to gather information and monitor schemes' service offer and their performance. Besides carrying out their own research and assessment, supply chain and governmental actors can also refer to analyses from NGOs and researchers can also provide valuable insights.ⁱ

- **Identify whether the scheme offers robust tools relevant to EUDR compliance.** Operators can check for schemes' service offering for geolocation data, risk assessments, legality checks, and volume tracking. The goal is to ensure the scheme provides the relevant functionalities in the first place.

ⁱ The works of EarthSight, Greenpeace, the World Wildlife Fund, and many other groups are notable on those topics. Some of the many relevant reports and articles are cited in references to this paper.

- **Check the transparency of audit and assurance processes.** Operators can look for publicly available descriptions of audit cycles, accreditation procedures, grievance mechanisms, and non-compliance handling. Transparent communication signals stronger scheme governance.
- **Consider whether the scheme demonstrates ongoing alignment with regulatory changes.** VSS that frequently update their standards and digital tools, and offer clear guidance materials and training on new changes can better prepare operators for new legal requirements, lowering long-term compliance risks for operators.

Context

Deforestation and forest degradation: status globally and in the EU

Deforestation, the loss of forest due to permanent land-use change, primarily to agriculture, and forest degradation, the conversion of natural forests into tree plantations, are globally rampant. Between 2001 and 2022, **86% of global deforestation** was attributable to crop and cattle production, underscoring the dominant role of agriculture in forest loss.² Recent data indicate a continued escalation in **primary tropical forest loss**, reaching **6.7 million hectares in 2024**, an increase of roughly **80% compared with 2023** with fires accounting for nearly half of this destruction.³ Fires are intricately linked to human activity, as many fires are often created for the purpose of clearing land for agriculture. This trajectory places the world far off course from commitments under the **2021 Glasgow Leaders' Declaration** to halt and reverse forest loss by 2030.

The European Union, despite comprising only **5.5% of the global population**, is responsible for an estimated **15% of global deforestation embedded in international trade**, reflecting the EU's significant external footprint on forest ecosystems.⁴ Within the EU itself, primary and old-growth forests are exceedingly rare and fragmented. Mapped primary forests amount to **just 3.2 million hectares**, representing **less than 3% of the EU's total forest area**, with around **90 percent** concentrated in Sweden, Finland, Bulgaria, and Romania.⁵ Yet this figure likely underestimates the true extent: there remains a **mapping gap of approximately 4.4 million hectares**, an area larger than the Netherlands, indicating that many primary forests are neither documented nor officially recognised.⁵ These remaining primary and old-growth forests face persistent threats due to weak or absent legal protection, incomplete mapping, and pressure from logging and land-use change. Without identification and safeguarding measures, the EU risks further degradation of its last intact forest ecosystems.

The EU Regulation on Deforestation-free products (EUDR)

The EU Regulation on Deforestation-free products (hereafter, EUDR or the Regulation),⁶ which entered into force on 29 June 2023, has been the landmark legislation taking aim at curbing deforestation and forest degradation from EU consumption of cattle, wood, cocoa, soy, palm oil, coffee, rubber, and some derived products such as leatherⁱⁱ, chocolate, tyres, or furniture.

ⁱⁱ As of May 2026, the European Commission proposed removing leather from the list of products covered under the EUDR, despite clear evidence of deforestation tied with EU leather imports. See EarthSight. (2026). [European leather sector tries to evade responsibility despite clear ties to deforestation](#). Web article.

The EUDR article 3 sets three key expectations from operators and traders of commodities:

“Relevant commodities and relevant products shall not be placed or made available on the market or exported, unless all the following conditions are fulfilled:

- (a) they are deforestation-free;*
- (b) they have been produced in accordance with the relevant legislation of the country of production; and*
- (c) they are covered by a due diligence statement.”*

Following from Article 3, operators and large traders must implement a due diligence system that:

- Collects information demonstrating that products are deforestation-free and legally produced. This includes traceability to the plot of land of production and the submission of geolocation coordinates for relevant production areas. (Art. 8)
- Assesses and mitigates risks. (Art. 8)
- Submits a due diligence statement (DDS) via the EU Information System before placing products on the market. (Art. 4(2))

A key principle is that an EUDR compliant products or products of unknown origin cannot be mixed with compliant products. This means that a mass balanceⁱⁱⁱ approach where compliant and non-compliant products are mixed is not allowed. Companies must maintain distinct flows for compliant and non-compliant materials, or else the entire shipment can be barred from entering the EU.

In response to the EUDR, voluntary sustainability schemes (such as those listed in Table 1) have developed their adapting their standards, tools, and digital systems to support companies' compliance. The EUDR^{iv} and related guidance^v explicitly mention that companies can call upon VSS to support the gathering of risk assessment and geolocation information. However, the EUDR is clear that VSS certification does not equal legal compliance and does not exempt operators from due diligence obligations.

Companies and civil society have been calling for the implementation of the Regulation without further delay.^{7 8} At the time of writing, these obligations have not entered into effect following a 12-month postponement of their entry into force, now expected 31 December 2026.⁹ While certain aspects of the Regulation remain subject to ongoing political discussions, including proposals related to simplification and reporting requirements, the European Commission has emphasized in the May 2026 'Simplification package' that it does not intend to alter the core objectives of the EUDR, the fundamental responsibilities placed on operators, nor the role of VSS in supporting compliance.¹⁰ Many countries, companies and certification schemes are already well advanced on the path to aligning their tools and practices with the EUDR requirements. The EUDR must now be implemented in its full scope by the end of 2026 as planned, as further uncertainty risks accelerating deforestation before the law comes into effect and creating economic instability in supply chains, affecting pristine ecosystems and local livelihoods.¹¹

Methodology, scope, and limitations of this paper

This paper examines how far VSS can support EUDR implementation, and where their limits lie. The findings aim to support further alignment of commodity sectors with the EUDR as a means of preventing further deforestation and forest degradation in the EU and globally.

ⁱⁱⁱ Mass balance is a chain-of-custody model that allows materials with different characteristics (for example, certified and non-certified materials) to be mixed in a single production process and a supply chain.

^{iv} *Recital (52); Article 10(2)(n) – Risk assessment*

^v [Guidance Document for Regulation \(EU\) 2023/1115 on Deforestation-Free Products - Green Forum](#)

Between December 2024 and May 2025, ECOS conducted a desk-based review of publicly available documentation from ten VSS and from academic and grey literature on the VSS offering of approaches and tools to comply with the EUDR. The schemes selected are all relevant to at least one of the commodities covered by the EUDR, have a significant presence in the EU supply chains, and have publicly communicated updates or guidance related to the EUDR. The schemes reviewed are:

- Bird-Friendly Coffee
- Certified Responsible Soya
- Fairtrade International
- Forest Stewardship Council (FSC)
- International Sustainability and Carbon Certification (ISCC)
- Programme for the Endorsement of Forest Certification (PEFC)
- ProTerra
- Rainforest Alliance
- Roundtable for Sustainable Palm Oil (RSPO)
- Sustainable Biomass Program (SBP)

Our analysis mainly focused on looking at how each scheme addressed compliance with EUDR requirements in three areas:

Traceability and geolocation

- Existence of systems for chain-of-custody (CoC) tracking
- Requirements for plot-level geolocation and land-use change monitoring
- Use of digital tools (e.g. GIS, satellite monitoring, blockchain platforms) to support traceability

Due diligence support and legality coverage

- Presence of EUDR-specific modules, add-ons, or guidance
- Extent to which schemes provide structured information for risk assessment and mitigation
- Legal compliance checks and their coverage (e.g. land tenure, FPIC, tax, labour, environmental law)
- Support for preparing DDS or interfacing with the EU Information System.

Treatment of mixed products and mass balance

- Allowed CoC models (identity preservation, segregation, mass balance, book and claim)
- Requirements placed on non-certified or controlled fractions in mixed products
- Alignment or conflict with EUDR rules on mixing compliant and non-compliant products

The review presents some key limitations:

- The review is based exclusively on publicly available information (standards, guidance, technical notes, online tools descriptions) published up to May 2025.
- Not all existing schemes relevant to the products listed under the EUDR could be reviewed within the scope of this research.
- We do not attempt to benchmark schemes against each other or to provide a comprehensive assessment of scheme performance on the ground.
- We did not assess other dimensions such as each scheme's governance, financial structures, or broader social and environmental impacts beyond what is relevant for EUDR alignment.
- As schemes are continuously revising their systems, this paper represents a snapshot in time and may not remain accurate over time.

This report is intended for **operators and companies** using or considering VSS as part of their due diligence systems, for the **schemes** themselves as they work to align with the EUDR, and for **policymakers** and **competent authorities** responsible for implementing and enforcing the Regulation.

Findings: How schemes are responding to the EUDR

Overview of the VSS landscape

The VSS landscape is clearly responding to the EUDR in similar ways to address the requirements of the EUDR. However, there are differences in how VSS choose to align. This requires companies to carefully evaluate which VSS and tools best fit their specific supply chains and commodities.

Echoing the EUDR, VSS consistently emphasize that the ultimate responsibility and liability for compliance rests with the operator, and that certification does not guarantee compliance. VSS are positioned both by the EUDR and themselves as tools for the due diligence process, providing data, assessments, and verification. However, operators must integrate this information into their own due diligence systems and cannot rely on certification as a substitute for their legal obligations.

Table 1 provides a brief overview of the selected schemes and their EUDR-related solutions.

Table 1 List of voluntary sustainability schemes assessed and the name or brief description of services offered.

| VSS name | Relevant commodities | EUDR solution |
|--|--|---|
| Bird-Friendly Coffee | Coffee, Cocoa | No specific EUDR add-ons or tools. |
| Certified Responsible Soya | Soy | Crop Insights software |
| Fairtrade International | Coffee, Cocoa | Updated Coffee Standard and Cocoa Standard |
| Forest Stewardship Council (FSC) | Wood, Rubber | FSC Regulatory Module; FSC Trace, FSC Risk Assessment Framework |
| International Sustainability and Carbon Certification (ISCC) | Cattle, Rubber, Cocoa, Coffee, Palm Oil, Soy, Wood | ISCC EUDR Add-on (for ISCC EU/Plus) |
| Programme for the Endorsement of Forest Certification (PEFC) | Wood, Rubber | PEFC EUDR DDS Module for Chain of Custody; Revised SFM Standard |
| ProTerra | Soy | Guidance issuance |
| Rainforest Alliance | Cocoa, Coffee, Palm Oil | Mandatory EUDR Assessment; Risk Assessment |
| Roundtable for Sustainable Palm Oil (RSPO) | Palm oil | Standard updates, enhancements to traceability systems |
| Sustainable Biomass Program (SBP) | Wood | EUDR add-on module within data transfer system |

Overall, our analysis identified four different strategies

Developing add-on modules

A prevalent approach among VSS, such as ISCC, FSC, PEFC, and SBP, is the creation of EUDR-specific add-on modules to their core standards. This allows schemes to integrate EUDR requirements without a complete revision of their core standards.

Leveraging technology and partnerships

There is a clear trend towards VSS partnering with specialised technology providers or developing in-house technological solutions to address the data-intensive aspects of EUDR. Examples include ISCC collaborating with GRAS for satellite monitoring and risk analysis, Fairtrade International partnering with Satelligence, SBP working with Global Traceability Solutions for its Data Transfer System module, and FSC developing its own blockchain-based FSC Trace platform.

Complementing traceability systems with EUDR-specific data

VSS are especially focusing on complementing their traceability systems. This often involves more specific data collection within existing chain of custody models, such as geolocation data, or the development of new digital platforms, such as RSPO's *prisma* and Donau Soja's Crop Insights.

Revising approaches to product mixing and supply-chain models

Several VSS have updated (or clarified) their supply-chain models. Schemes such as Fairtrade now emphasise physical segregation for EUDR-aligned claims, while others, e.g. ProTerra, exclude mass balance entirely for EUDR purposes. FSC, PEFC, and SBP have begun specifying how non-certified inputs in mixed products must still meet EUDR requirements, whether through Controlled Wood criteria or EUDR-specific due diligence modules.

Review of each scheme

Below we provide a descriptive summary of each scheme's main EUDR-related measures and approach to product mixing.

Bird-Friendly Coffee

The Bird-Friendly certification focuses on maintaining agroforestry systems that provide critical habitat for migratory and resident bird species. However, the certification does not define a deforestation cut-off date nor include dedicated tools for geolocation reporting, risk assessment, or due diligence documentation. As Bird-Friendly standards do not currently incorporate mechanisms designed for EUDR compliance, operators placing Bird-Friendly products on the EU market need to complement the certification with geolocation, traceability and DDS-generation systems to fulfil EUDR due diligence and reporting obligations.

Bird-Friendly Coffee is primarily a production-level biodiversity standard and does not provide specific guidance on EUDR-related product mixing or mass balance, so operators must ensure that any mixed products meet EUDR requirements independently of the Bird-Friendly label.

Certified Responsible Soya (Donau Soja, Europe Soya)

Donau Soja has developed Crop Insights, a software designed to assist companies in complying with the EUDR across their soy supply chains. This tool is applicable for both certified soy as well as non-certified soy sourced from Europe and South America. Donau Soja also provides guidance and advisory support to companies navigating EUDR requirements.¹²

The *Crop Insights* software incorporates geodata collection, enables the creation of a DDS, and facilitates the transmission of relevant documents.¹² However, it does not include standalone and automated risk assessment.

The *Crop Insights* software leverages Donau Soja's experience with European supply chains, but its applicability is also extended to South American sources. The decision to offer this software for both certified and non-certified soy also suggests a broader market strategy beyond merely supporting existing certificate holders.

For products making an EUDR claim that include non-certified soy, Crop Insights requires that the non-certified portion is also EUDR-compliant. Crop Insights provides tools to check compliance for non-certified soy. Note that Donau Soja does not impose their sustainability requirements on this non-certified portion.

Fairtrade International

Fairtrade International has updated its standards for coffee and cocoa to incorporate EUDR alignment. New elements include requirements for geolocation mapping, deforestation monitoring (in partnership with Satelligence), risk assessments, and mitigation plans. The standards will apply to all Fairtrade-certified products (coffee and cocoa), not just those destined for the EU.¹³ Fairtrade has partnered with Satelligence to provide deforestation risk data and monitoring services to its certified coffee and cocoa producers. The standards require producers to conduct risk assessments and develop mitigation plans, supported by trade partners with the goal of equalizing the compliance burden.¹⁴

A central theme in Fairtrade's EUDR response is supporting smallholder producer organizations, through requiring trading partners to support data collection and dissemination, and their efforts to provide tools like Satelligence-supported deforestation monitoring.¹⁴

The partnership with Satelligence for deforestation monitoring aligns Fairtrade with other VSS leveraging specialized tech providers.

Fairtrade's EUDR alignment focuses on ensuring that the Fairtrade-certified portion of a product meets EUDR requirements and Fairtrade's social and environmental criteria; it does not impose specific additional sustainability criteria on any non-Fairtrade portion, so responsibility for verifying the EUDR compliance of mixed or non-certified fractions rests with the operator.

Forest Stewardship Council (FSC)

FSC has launched a collection of solutions, including (i) a new voluntary standard, "FSC Regulatory Module", (ii) a blockchain-based traceability platform, FSC Trace, and (iii) the FSC Risk Assessment Framework.

The FSC Regulatory Module is an add-on to existing FSC standards, and users must already be certified with FSC or be in the process of seeking certification. It has specific requirements for implementing a due diligence system, information collection, risk assessment, and risk mitigation measures.¹⁵ It does not require each company in the supply chain to include the Regulatory Module in its certification scope.¹⁶ However, this can be demonstrated through new claims; the "Regulatory/REG" and "Regulatory+/REG+" claims have been introduced for products that conform to the Regulatory Module, with REG+ indicating that every operator in that specific supply chain has applied the module.¹⁵ FSC also mentions that even though the Regulatory Module standard focuses on wood and rubber, if other commodities falling under the EUDR, e.g. coffee, are included in the scope of FSC certification, the operator also has to demonstrate conformance for these commodities.¹⁷

FSC Trace is a platform using blockchain technology to create a record of transactions to verify the traceability of feedstock as well as transmission of other documents, such as harvesting licenses.¹⁸ The platform will also enable users to create a DDS.

The FSC Risk Assessment Framework provides a simplified risk assessment template, where EUDR-related indicators are pre-filled. Through the FSC Risk Hub, certified operators can identify applicable risks of origin for the products they procure and manage their own risk assessments.¹⁹

FSC's investment in technology, particularly FSC Trace, signals an understanding of the usefulness of digital tools in responding to the EUDR's complex traceability requirements. FSC Trace is being rolled out in phases and its practical uptake and integration with operators' workflows remains to be seen.

FSC offers "FSC 100%" (all material from FSC-certified forests), "FSC Mix", and "FSC Recycled" labels. In an "FSC Mix" product, any virgin wood that is not FSC-certified must meet FSC Controlled Wood standards, which are designed to exclude categories such as illegally harvested wood and wood from forests converted to plantations or non-forest use. These safeguards often go beyond EUDR minimum criteria but are not identical to the Regulation's definitions and scope.

International Sustainability and Carbon Certification (ISCC)

ISCC has introduced a dedicated "ISCC EUDR add-on" for operators that are already ISCC-certified. This voluntary module can be combined with either ISCC EU or ISCC PLUS certifications.²⁰ For an operator to be certified under the add-on, all members of the supply chain need to be ISCC-certified and use the EUDR add-on.²¹

The digital ISCC EUDRx tool can be used by the first individually certified actor in the supply chain to conduct geolocation-based deforestation analysis.²¹ It also generates a report, which can be used for the operator's DDS. The EUDRx report helps an operator prepare the DDS but does not in itself remove the legal responsibility of operators to carry out due diligence.

Because all supply chain actors must apply the EUDR add-on for an ISCC EUDR claim, there is no distinct "non-certified fraction" within an EUDR-certified chain: all inputs in such a chain must meet ISCC core sustainability requirements plus the additional EUDR criteria.

Program for the Endorsement of Forest Certification (PEFC)

PEFC has adopted a dual strategy to address the EUDR. Firstly, PEFC revised its core Sustainable Forest Management (SFM) standard to align that material originating directly from PEFC-certified forests should conform to EUDR requirements.

Secondly, PEFC has developed the PEFC EUDR Due Diligence System module for operators with the PEFC Chain of Custody certification.²² The PEFC EUDR DDS module outlines a structured approach for implementing an EUDR-aligned due diligence system. The revised SFM standard incorporates new and amended requirements to facilitate EUDR alignment. Key changes include more detailed structuring of forest input categories, specification of definitions for deforestation and forest degradation, and a framework for the consideration of Trees Outside Forests. PEFC's national members are now to amend their national and regional standards to align with this revised standard.²²

PEFC does not have an explicit tool to support the collection of, for example, geolocation data or new digital tools for traceability. The success of the SFM standard revision will depend on the timely and consistent transposition of these benchmark requirements into the national standards endorsed by PEFC. The status of this process is unclear at the time of writing. This process could introduce variability in implementation across different countries.

For products carrying a "PEFC-EUDR" claim that include non-PEFC certified virgin material, that material must be assessed through the PEFC EUDR DDS module to ensure it is deforestation-free and legal per EUDR. PEFC also has a Controlled Sources²³ framework that sets requirements for non-PEFC certified material to avoid "controversial sources", although public information on detailed criteria remains limited. The underlying PEFC CoC standard requires that any mixed non-certified material meets these Controlled Sources requirements.

ProTerra

ProTerra benchmarked its own Standard against the EUDR in January 2025 and concluded that it "strongly adheres" to all applicable articles of the regulation. ProTerra also issued a "specific mandatory guidance for organisations, certification bodies and auditors", supporting the implementation and assessment of compliance with the EUDR.²⁴ The mandatory guidance clarifies, for example, that certified operators must collect geolocation data for plots of land from which products are sourced.

ProTerra certification audits include a review of satellite imagery for potential deforestation. However, it seems that operators certifying with ProTerra would need to complement their compliance efforts with external tools or services to communicate the exact GPS data collection and formatting required by EUDR.²⁴ Similarly, ProTerra does not provide specific risk assessment services but positions itself as a tool to understand risk. Operators that target the European market will however be audited on their risk assessment and mitigation approaches.²⁵ ProTerra also does not support DDS creation.

The "specific mandatory guidance" is the central piece of ProTerra's EUDR adaptation, clarifying how the standard should be interpreted and applied in the context of EUDR. ProTerra is also transparent about the areas where its certification may not fulfil all the technical EUDR requirements, such as specific geolocation data formats or automated DDS submission, and openly suggests utilising third-party platforms.

For products making an EUDR claim with ProTerra, mass balance is not allowed: any EUDR-labelled product must consist entirely of material verified against EUDR requirements, rather than a mix of compliant and non-compliant fractions.

Rainforest Alliance

The Rainforest Alliance (RA) has introduced specific assessments against EUDR requirements and offers tools and policies to support compliance for the coffee and cocoa supply chains. This means that all current and future coffee and cocoa farm certificate holders will be audited against EUDR-aligned requirements. However, this does not mean that if an operator fails to fulfil the EUDR requirements, the operator would be decertified from the Rainforest Alliance Sustainable Agriculture Standard – only that they cannot claim EUDR alignment.²⁶

RA's EUDR alignment is managed through the Alignment with the EUDR Policy and the EUDR Data Sharing Policy. Additionally, RA has developed an EUDR Deforestation Risk Assessment Tool, accessible to both certified and non-certified coffee and cocoa operators.

The Alignment with the EUDR Policy document introduces five additional requirements for coffee and cocoa farm certificate holders, supplementing the existing Sustainable Agriculture Standard.²⁶ The EUDR Data Sharing Policy governs the sharing of EUDR-relevant data.²⁷ The EUDR Deforestation Risk Assessment Tool allows any coffee/cocoa actor, certified or uncertified, to generate reports on deforestation risk assessment maps.²⁸

The decision that non-compliance with these EUDR-specific requirements does not lead to decertification from the main RA standard creates a two-tiered system: RA certified, and RA certified plus EUDR-aligned. This could provide flexibility for producers not targeting the EU market and prepare operators to potentially meet the requirements in the future but might also create confusion if not clearly communicated. In addition, the fact that farm certificate holders can opt out of sharing their EUDR-aligned data²⁶ can pose a challenge for downstream companies needing the data for their DDS.

We did not find detailed public information on a specific EUDR solution for RA-certified palm oil. This suggests that operators sourcing RA palm oil for the EU market may need to seek further clarification or rely on other mechanisms for their EUDR alignment.

In the case of mixed products, RA's EUDR alignment focuses on the RA-certified component; it does not systematically extend RA's sustainability requirements to any non-RA certified fraction, leaving operators responsible for verifying that any mixed or non-certified portion meets EUDR requirements.

Roundtable for Sustainable Palm Oil (RSPO)

RSPO views its certification and systems as already complementary to the EUDR's objectives. In their 2024 revision of their Principles and Criteria, some requirements were updated to better align with the EUDR including a requirement to provide the geographical location of a plot of land with EUDR-specific details. However, no specific modules or add-ons were developed specifically for EUDR compliance purposes.²⁹

In February 2025, RSPO launched the *prisma* platform to enhance supply chain traceability. All operators dealing with RSPO Certified products are to use the system. The platform is designed to ensure that sustainability information, including deforestation status, is shared throughout the supply chain.²⁹ Public documentation does not present *prisma* as an automated DDS generator for the EU Information System (operators may still need complementary tools for DDS creation and technical DDS formatting).

RSPO's mass-balance model permits mixing certified and non-certified palm oil under RSPO rules, but these arrangements do not automatically satisfy EUDR expectations. For EUDR compliance of a mixed product, the non-certified portion would independently need to be verified as deforestation-free and legal, with RSPO itself recognising the distinction between its supply-chain models and the EUDR's requirements.²⁹

Sustainable Biomass Program (SBP)

SBP has developed a voluntary EUDR add-on module that integrates with its existing Data Transfer System (DTS). The module enables operators to conduct risk assessments, describe risk mitigation measures, and submit a DDS.³⁰

The SBP Data Transfer System is a platform already used for managing data related to biomass sustainability and origin. This approach suggests a focus on leveraging digital infrastructure to handle the data-related aspects of EUDR compliance, a trend also observed with other VSS. However, we only found limited publicly available information on the technical specifications of the way the add-on module addresses EUDR requirements. The operational details and uptake by certificate holders will determine how effectively it substitutes for third-party DDS/GIS solutions in real cases.

Where products claimed as EUDR-compliant include both SBP- and non-SBP-certified biomass, the non-SBP fraction must itself be EUDR-compliant (deforestation-free and legal), even if SBP's own certification system does not extend its full requirements to that material.

Systemic risks and limitations of relying on VSS for EUDR due diligence

General systemic risks in sustainability certification

Certification provides an essential function for sustainability, yet these profoundly human—and increasingly digital³¹ – systems are prone to error and fraud. Companies and competent authorities seeking the support of schemes to carry out due diligence and ensure sustainable and legal product sourcing should therefore be aware of these risks. Civil society, academia and EU institutions have repeatedly highlighted these risks, identifying various systemic failures to carry out their role, including when it comes to preparing for the EUDR.^{32 33 34 35} This section draws on the findings of these publications and on findings from the ECOS assessment of schemes.

Audit quality, consistency, and capacity

The credibility of any VSS hinges on the quality, consistency, and rigour of its audits. Sustainability standards can be complex, technical, and open to interpretation. Some issues are difficult or impossible to detect by spot audits. Several structural issues can further increase the risks related to auditing failures:

- Qualitative assessments can be of low quality,³¹ sometimes compounded by the lack of auditor training.³⁶
- Stakeholder engagement in the audit process might be limited and reduce the ability to detect fraud, making the audit principally reliant on the views of the audited company and the auditor.³⁷
- Auditors are typically financially dependent on the company being audited,³¹ increasing the willingness to gloss over non-compliance.
- There may be inconsistencies in how different auditors or certification bodies interpret and apply due diligence requirements.
- The risk of "audit shopping", i.e. when companies switch between certification bodies to find one that offers less strict application of a standard, can lead to a lowering of auditing stringency, increasing failures to uncover non-compliance.

The EUDR, and due diligence systems in general, mandate compliance with a broad spectrum of laws in the country of production. Some VSS claim comprehensive legality checks (e.g., ISCC states its EUDR add-on assesses all nine legality aspects). However, the extent to which certification bodies have the competencies to conduct sufficiently rigorous audits for complex topics such as national tax codes or nuanced land tenure and FPIC processes across diverse legal systems may be limited. Operators might overly rely on a VSS certificate as proof of full legality, neglecting their own due diligence for these broader legal aspects, especially those outside traditional environmental audits.

Robustness of traceability

A lack of traceability usually conceals problems in the supply chain. For example, the ultimate owners of certified companies might be involved in unsustainable and unethical activities through other corporate groups. The decision of what sort of traceability system(s) to accept can impact the credibility and transparency of a scheme. For example, if mass balance and book and claim systems are accepted by the scheme, mixing certified and uncertified products is allowed, thereby going against the EUDR. While some VSS are strengthening traceability requirements (e.g., Fairtrade mandating physical segregation), implementing and auditing segregation in traditionally bulk commodity supply chains is challenging and raises the risks of fraudulent mixing with low ability to actually discover fraud during an audit or during due diligence if tools such as volume tracking were not in place from the outset.

Lack of transparency

Lack of transparency is also an issue with schemes. For example, audit results are often not public, and a scheme might state that an operator is compliant without providing information on the extent or proof of compliance. If audit results or summary reports are published, they sometimes exclude essential details. Without transparency of audit results, stakeholders such as competent authorities and civil society can only assess the quality of the company's due diligence to a limited extent.

Audit information may not be transferred consistently between auditors or certification bodies, particularly when companies switch auditors. Important findings from earlier assessments can be lost, weakening the ability to detect recurring non-compliance. A parallel issue can arise when audit results are not communicated to the certification scheme, or with competent authorities, reducing the adequacy of certification schemes' internal monitoring processes, or the effectiveness of border controls and enforcement.

Communication of information between auditors is addressed in Commission Implementing Regulation (EU) 2022/996 on rules to verify sustainability and greenhouse gas emissions saving criteria and low indirect land-use change-risk criteria. This Regulation contains the requirement that “Voluntary schemes shall also ensure an efficient and timely exchange of audit information between them to support the effective preparation and conduct of the audit.”

On a different topic, the technological tools that VSS are adopting to answer to EUDR requirements (e.g. satellite monitoring) may have their limitations and be operated through data analysis processes and algorithms that may not always be transparent or independently scrutinised, potentially leading to inaccurate assessments.

Weaknesses in grievance, remediation, and community feedback mechanisms

Evidence from MSI Integrity’s³⁸ 2020 report shows that most multi-stakeholder initiatives (MSIs),^{vi} including those active in commodity certification, fail to provide communities with effective mechanisms to raise complaints or obtain remedy. The report found that nearly one-third of MSIs do not have a grievance mechanism at all, leaving rights holders dependent on company-level systems that often lack minimum safeguards. Even where mechanisms exist, they rarely meet internationally recognised standards. Most mechanisms are inaccessible to affected communities: complaint procedures are often available only in English, rarely translated, and not actively communicated to rights holders. Processes also tend to lack clear timelines or transparency about outcomes, which weakens trust and deters the use of the procedures. Very few MSIs provide support to complainants or ensure that harmed communities have equitable access to information or expertise. Importantly, only a handful of systems disclose complaint outcomes or publish data on cases filed and resolved, limiting public scrutiny.

Crucially, in most cases, mechanisms do not require meaningful participation of affected communities when determining remedies, nor do they ensure that complaints lead to actual corrective action. As a result, governance gaps persist: communities face barriers to raising concerns, harmful practices may continue undisclosed, and certification systems lose opportunities for continuous learning and improvement. This systemic weakness has direct implications for due diligence frameworks, including the EUDR, which rely on credible channels for identifying and addressing harms in supply chains.

Specific issues among schemes in aligning with the EUDR

Although schemes are rapidly adapting their tools, digital systems and standards to support companies preparing for EUDR implementation, their approaches differ considerably. These differences mean operators and competent authorities cannot assume consistent EUDR readiness across certifications. In this section we examine some of the potential challenges created by these divergences, including definitions, legal compliance expectations, technical capacities, and data requirements, all of which limit the extent to which certification can replace a company’s own due diligence. Certain issues noted here have immediate consequences for due diligence, whereas others remain potential risks that require monitoring to prevent them from materialising. Only ongoing assessment will reveal whether the schemes’ tools and services effectively support sustainability goals.

^{vi} The MSI Integrity study included some of this report’s assessed VSS, specifically: Fairtrade International, Forest Stewardship Council, International Sustainability and Carbon Certification, Programme for the Endorsement of Forest Certification, Rainforest Alliance, Roundtable on Sustainable Palm Oil.

Different scopes and definitions of forest

A key challenge across the schemes concerns differences in how forests and land-use change are defined, which can create gaps when compared with the EUDR's legally binding definitions. As highlighted by Cosimo et al. (2024), voluntary standards often rely on broader ecosystem protection concepts or focus on high conservation value areas, while others use historical cut-off dates or definitions centred on canopy cover thresholds that do not fully align with the EUDR's forest definition and reference date.

However, some schemes' requirements also go beyond what the EUDR prescribes, for example:

- ProTerra's core PT v5 standard has a stricter cut-off date (31.12.2008) compared to the EUDR while the MRV Standard applies the same cut-off date as the EUDR (31 December 2020). Both standards extend protection of vegetated areas beyond the definition of a forest, including grasslands, peatlands, wetlands, savannahs, etc.²⁴
- Fairtrade updated its coffee standard to set 1 January 2014 as its cut-off for deforestation/conversion at the farm level.³⁹
- RSPO has identified differences between its own system and the EUDR, such as the forest definition, helps set expectations for operators. The RSPO standard protects primary forests from November 2005 and secondary forests from November 2018.

Schemes also vary in how they address degradation, with some lacking explicit criteria. These discrepancies in definitions increase the need for operators to conduct additional checks, even when using certified materials, and limit the automatic transferability of certification claims into due diligence statements under the EUDR.

Different expectations regarding legal compliance

Several standards have been identified by Cosimo et al. (2024) as not aligning their legal compliance requirements for certification with the full scope of existing legal frameworks, creating loopholes in the need to comply while still being eligible to obtain certification. Documented instances of companies retaining certification have been reported across different sectors and geographies, even in blatant cases of illegality.^{33 40 41}

Due diligence statement generation and submission

While several VSS are developing tools to help operators compile the data necessary for their DDS, the connection of these VSS systems to the EU's official system for DDS submission is a new development. The ease of use and reliability of these interfaces will be key for operators and to ensure the completeness and validity of the data submitted.

One critical element is the reliance on suppliers to enter or upload valid legal documents demonstrating compliance. Schemes cannot fully automate or guarantee the authenticity of submitted proofs, meaning that the system is only as trustworthy as the information provided. This relates back to the dependency on suppliers' diligence and transparency in meeting EUDR requirements.

Generating accurate geolocation data

Specification and enforcement of geolocation and plot-level data, mapping and monitoring of land-use change must be accurate and fulfil EUDR data requirements. VSS should ensure that their own verification and audits of the data submitted increase accuracy and conformance. Compliance verification requires high levels of precision in mapping. Coordinates must be entered in the correct format and projection, and polygons must accurately reflect the areas under production. If these requirements are not strictly met, the results may be misleading. Trust in the system therefore depends not only on technological capabilities, but also on the accuracy and integrity of user inputs.

Data management and security

The proliferation of different VSS tools, often developed with partners, raises questions about data interoperability. Companies that source multiple commodities certified by different VSS may face challenges in consolidating data from different systems. Furthermore, the secure management of sensitive data is paramount.

Issues related to mass balance and product mixing

In response to the requirement on physical segregation of raw materials from non-certified sources, schemes emphasize physical segregation or identity preservation to ensure that materials claimed as EUDR-compliant are indeed compliant. Despite the legal requirement, there is a risk in mixing due to the inherent lack of control in the uncertified part of the supply chain, leading to possible import of products associated with deforestation.⁴² Indeed, many of the schemes we assessed allow for the mixing of uncertified products, and while some impose requirements on companies to ensure EUDR compliance of the entire shipment, others do not seem to place expectations on companies regarding mixing.

The integrity of the schemes' compliance checks relies heavily on the quality of the underlying data, the degree of cooperation from suppliers, the extensiveness of audits, and the accuracy of mapping processes. Without reliable inputs, even sophisticated traceability systems may fall short in practice.

Issues of control around trade of illegal products or products under false certification claims have plagued supply chains in sectors covered by the EUDR and related legislation, occasionally linked to product mixing. For instance, the Environmental Investigation Agency (EIA) reported on the fraudulent mixing and import of FSC-certified with uncertified plywood from illegal sources linked to deforestation in Oceania.³³ Frauds could be committed due to gaps in the tracking of shipments, particularly in the mass balance of the imported material in which certified material volumes were substantially inflated and blended into supply chains with illegal material under false certification claims. These cases undermine the integrity of claimed deforestation-free or certified supply chains, making it impossible for downstream operators simply to rely on certification labels without additional verification.

In response to these risks, EIA underlined the urgent need for digital systems to track the origin and volumes of material in each shipment to detect and prevent the laundering of non-compliant material into certified streams.

Our review confirms that mass balance and product mixing are handled very differently across schemes:

- Some schemes, such as **ProTerra**, explicitly prohibit mass balance for EUDR claims, requiring that all material in an EUDR-labelled product meets EUDR requirements.
- **ISCC** requires all supply chain actors in an EUDR-certified chain to apply the EUDR add-on, thereby avoiding a distinct “non-certified fraction” within that chain.
- Schemes like **FSC** and **PEFC** allow mixed products but apply additional requirements (e.g. Controlled Wood, Controlled Sources) to the non-certified portion. In the case of FSC, the requirements go beyond minimum legal requirements.
- Other schemes, such as **Fairtrade**, **Rainforest Alliance** or **RSPO**, focus on ensuring that the certified portion meets their standards and do not systematically extend equivalent sustainability or legality requirements to the non-certified fraction in mixed products. In these cases, the responsibility for verifying the non-certified portion's EUDR compliance falls entirely on the operator.
- Tools like **Donau Soja's Crop Insights** or **SBP's Data Transfer System** can help assess non-certified inputs, but the robustness of their use in practice depends on how operators implement them.

Across the schemes assessed, the treatment of mixed products reveals a limitation for EUDR compliance: certification systems focus primarily on the integrity of their own certified material and do not take responsibility for verifying the sustainability or legality of any non-certified portion. While some schemes provide tools or controlled-source frameworks that set minimum safeguards for mixed inputs, these are uneven in scope and do not consistently align with EUDR requirements. Others, such as ISCC or ProTerra, avoid the issue altogether by requiring full coverage of all inputs through their own EUDR-specific modules or by disallowing mixing.

From an EUDR perspective, this is a structural weak point: unless non-certified fractions are subject to EUDR-equivalent checks, mixed products pose a significant risk of importing material linked to deforestation or forest degradation under an EUDR claim. This is why we argue that mass balance should not be permitted for EUDR compliance claims, and that robust volume tracking, physical segregation, or identity preservation should be the norm for products placed on the market as EUDR-compliant.

What can operators reasonably demand from schemes?

Considering the risks outlined, certification cannot act as a replacement for due diligence. Instead, it can serve as one component in a company's wider system of risk assessment, verification, and monitoring. In particular, operators can inquire whether schemes within their sector can:

- Provide structured, independently verifiable information that feeds into companies' own due diligence.
- Support traceability with geolocation data, maps, and volume tracking that companies can integrate into risk assessments.
- Offer risk screening tools and country or region-specific risk profiles to help companies identify where further investigation is needed.
- Deliver training and capacity-building for producers and suppliers on legal compliance, labour rights, and environmental management.
- Facilitate grievance, remediation, and community feedback mechanisms that operators can use as part of ongoing risk monitoring.
- Provide access to documentation on legal compliance checks (e.g., land titles, harvesting permits, tax and labour records) to reduce information gaps.
- Serve as a platform for continuous improvement and long-term supplier engagement, rather than one-off compliance verification.

Conclusions

Across the literature and our review of schemes, several conclusions emerge:

Certification systems can support but cannot replace EUDR due diligence.

- VSS provide useful structures, data and tools, but systemic weaknesses in audit quality, traceability, transparency and legal coverage make them insufficient as evidence of EUDR compliance. Operators remain fully responsible and legally liable for verifying that each shipment is deforestation-free and legally produced.

Mass balance and product mixing are weak points for EUDR compliance.

- Where non-certified fractions are not subject to equivalent EUDR-level scrutiny, mixed products pose a high risk of laundering non-compliant material into EUDR-labelled flows. The diversity of approaches to mixing across schemes reinforces this risk.

Policymakers must define clear guardrails for the use of certification in EUDR implementation.

- Without explicit limits and expectations, there is a risk that VSS will be treated de facto as a shortcut for due diligence, undermining the Regulation's effectiveness.

Operators and schemes share responsibility for closing gaps.

- Operators must build robust internal due diligence systems and scrutinise scheme tools. Schemes must improve alignment with EUDR requirements, strengthen audits and clarify the treatment of mixed products and mass balance.

These conclusions provide a pathway of recommendations for operators and companies, voluntary sustainability schemes, and policymakers. In short:

- **Operators and companies** should never treat certification as a proxy for legality and build due diligence systems that use VSS data as one input among many, with particular attention to volume tracking, geolocation quality and any non-certified fractions in mixed products.
- **VSS** should tighten their audit, traceability and transparency requirements, explicitly address EUDR alignment across all relevant commodities, and clarify under what conditions (if any) mixing and mass balance can be compatible with EUDR claims.
- **Policymakers and competent authorities** should establish minimum rules for how certification can be used in EUDR implementation, prohibit mass balance for EUDR compliance claims, and strengthen oversight of auditing and accreditation systems.

Together, these changes would help ensure that certification plays a constructive role in the EUDR architecture in supporting the Regulation's objective to eliminate deforestation and forest degradation from EU supply chains.

References

-
- ¹ European Commission. (2026). [Guidance Document for Regulation \(EU\) 2023/1115 on Deforestation-Free Products](#).
 - ² West, C., Rabeschi, G., Singh, C. et al. The global deforestation footprint of agriculture and forestry. *Nat Rev Earth Environ* 6, 325–341 (2025). <https://doi.org/10.1038/s43017-025-00660-3>
 - ³ World Resources Institute. (2026, April 29). [Tropical rainforest loss slowed in 2025, but fire is a growing threat to forests worldwide](#). Global Forest Review.
 - ⁴ Grabbe, H., & Moffat, L. L. (2024, November 14). [Extra time for deforestation: lessons for future EU environmental legislation](#). (Policy Brief 28/2024).
 - ⁵ JRC. (2021). *Primary and Old-growth Forests in the EU: Mapping and Protection Status*.
 - ⁶ European Commission. (n.d.). [Regulation on deforestation-free products](#).
 - ⁷ Voice Network. (2025). [Cross-Commodity group of companies urges EU to not reopen EUDR](#).
 - ⁸ Earthsight. (2025). Risky Business. EU Timber Imports Linked to the Destruction of Borneo's Forests. <https://www.earthsight.org.uk/media/download/2366>
 - ⁹ Regulation (EU) 2025/2650 of the European Parliament and of the Council of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders.
 - ¹⁰ See European Commission press release and related documents. (2026). [Commission publishes simplification review of EU Deforestation Regulation](#). (Press release).
 - ¹¹ Fern. (2026, April 1). [As cocoa farmers suffer yet another "boom and bust" price cycle, EUDR and Schedule 17 could help](#).
 - ¹² Donau Soja. (n.d.). [Get ready for the EU Deforestation Regulation with Crop Insights; Crop Insights: The solution to accelerate your EUDR compliance](#).
 - ¹³ Daily Coffee News. (2024). [Fairtrade International Updating Coffee Standard to Meet or Exceed EUDR](#).
 - ¹⁴ Fairtrade International. (n.d.). [Fairtrade supports forest protection and deforestation prevention](#).
 - ¹⁵ FSC. (n.d.). [FSC Regulatory Module](#).

-
- ¹⁶ FSC. (n.d.). [FAQ](#).
- ¹⁷ FSC. (2024). FSC Regulatory Module. FSC-STD-01-004 V1-0. <https://static1.squarespace.com/static/65a5120f06652261eec4b6a4/t/65b921312d71e727146b5a17/1706631475938/FSC-STD-01-004+FSC+Regulatory+Module.pdf>
- ¹⁸ FSC. (n.d.). [FSC Trace](#).
- ¹⁹ FSC. (n.d.) STREAMLINE YOUR EUDR COMPLIANCE JOURNEY. https://fsc.org/sites/default/files/2024-09/FSC%20Aligned%20for%20EUDR_Fact%20sheet.pdf
- ²⁰ ISCC System. (2025, February 11). [The clock is ticking: Here's how to get ready for the EUDR](#).
- ²¹ ISCC System. (2024). *EUDR add-on guidance document* (Version 1.0). https://www.iscc-system.org/wp-content/uploads/2024/11/ISCC_EUDR-Add-on-Guidance-Document-final.pdf
- ²² PEFC International. (2024, November 13). *Revised PEFC sustainable forest management benchmark standard approved*. <https://pefc.org/news/revised-pefc-sustainable-forest-management-benchmark-standard-approved>
- ²³ PEFC International. (n.d.). *Use the PEFC label*. pefc.org/for-business/supply-chain-companies/use-the-pefc-label
- ²⁴ ProTerra Foundation. (2025). *ProTerra Standard V5 and the European Regulation on deforestation-free commodities (EUDR)*. www.proterrafoundation.org/news/proterra-standard-v5-and-the-european-regulation-on-deforestation-free-commodities-eudr/
- ²⁵ ProTerra Foundation. (2025). *EUDR-specific guidance for ProTerra Standard V5* (Version 1.0). proterrafoundation.org/wp-content/uploads/2025/01/2025-01-14-EUDR-Specific-Guidance-for-PT-V5-v1.0.pdf
- ²⁶ Rainforest Alliance. (2025). [EUDR and the Rainforest Alliance certification program: Upgrading our approach](#).
- ²⁷ Rainforest Alliance. (2025). [Policy: EUDR data sharing](#).
- ²⁸ Rainforest Alliance. (n.d.). [EUDR. What is Needed to Comply with the EUDR?](#)
- ²⁹ Roundtable on Sustainable Palm Oil. (2025). [RSPO and EUDR](#).
- ³⁰ Sustainable Biomass Program. (2024). [SBP launches EUDR add-on module for the DTS](#).
- ³¹ Castka, P., Searcy, C., & Fischer, S. (2020). Technology-enhanced auditing in voluntary sustainability standards: The impact of COVID-19. *Sustainability*, 12(11), Article 4740. <https://doi.org/10.3390/su12114740>
- ³² Forests & Finance Coalition. (2024). [Banking on false promises: The risks of overreliance on flawed certification schemes](#)
- ³³ Greenpeace International. (2021). *Destruction: Certified*. <https://www.greenpeace.org/international/publication/46812/destruction-certified/>
- ³⁴ Earthsight. (2024). [Academic study confirms green labels fall short of requirements set by upcoming EU deforestation law](#).
- ³⁵ MSI Integrity. (2020). *Not fit-for-purpose: The grand experiment of multi-stakeholder initiatives in corporate accountability, human rights and global governance*. https://www.msi-integrity.org/wp-content/uploads/2020/07/MSI_Not_Fit_For_Purpose_FORWEBSITE.FINAL_.pdf
- ³⁶ Leehane, N. (2018, June). *Future challenges for environmental auditing*. Institute of Environmental Management & Assessment (IEMA). <https://www.iema.net/media/tnbj3nx1/iema-future-challenges-for-environmental-auditing-june-2018-vs-2.pdf>
- ³⁷ European Commission, Directorate-General for Environment. (2021). *Study on certification and verification schemes in the forest sector and for wood-based products*. <https://op.europa.eu/en/publication-detail/-/publication/afa5e0df-fb19-11eb-b520-01aa75ed71a1/language-en>
- ³⁸ Not Fit-for-Purpose – The Grand Experiment of Multi-Stakeholder Initiatives in Corporate Accountability, Human Rights and Global Governance [MSI_Not_Fit_For_Purpose_FORWEBSITE.FINAL_.pdf](#)
- ³⁹ Fairtrade International. (2024, February 12). *Fairtrade coffee standard update expands deforestation prevention*. www.fairtrade.net/en/get-involved/news/fairtrade-coffee-standard-update-expands-deforestation-prevention.html
- ⁴⁰ Environmental Investigation Agency. (2021). *The lie behind the ply: How European and Chinese businesses traded 100,000 tons of problematic plywood*. <https://eia.org/wp-content/uploads/2021/06/EIA-LieBehindThePly.pdf>
- ⁴¹ Euractiv. (2018, January 25). [Ivory Coast cocoa sector hit by certification fraud](#).
- ⁴² Cosimo, L. H. E., Masiero, M., Mammadova, A., & Pettenella, D. (2024). *Voluntary sustainability standards to cope with the new European Union regulation on deforestation-free products: A gap analysis*. *Forest Policy and Economics*, 164, 103235. <https://doi.org/10.1016/j.forpol.2024.103235>