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//eur-lex.europa.eu/legal-content/EN/TX T/?uri=CELEX:32023R1115" target="_blank" rel="noopener noreferrer">EUDR, CSDDD, and EUFLR: Europe's Due Diligence Triple Mandate

By Sayari Analyst Team · Published March 2025

Three European regulations now require supply chain due diligence – and their requirements overlap without aligning perfectly. Here's what a unified compliance approach looks like.

Three separate European regulations converge on supply chain compliance with staggered deadlines, overlapping scopes, and different evidentiary standards. The EU Deforestation Regulation (EUDR) requires plot-level geolocation data for seven commodity categories. The Corporate Sustainability Due Diligence Directive (CSDDD) mandates human rights and environmental risk assessment across entire value chains. The EU Forced Labor Regulation (EUFLR) bans imports of goods made with forced labor.

For multinationals subject to Germany's LkSG or planning EU market expansion, the challenge is structuring supplier data, due diligence workflows, and evidence collection to satisfy all three regimes simultaneously without tripling operational overhead.

Regulatory Requirements and Where They Overlap

EUDR applies to seven commodities: cattle, cocoa, coffee, palm oil, soya, wood, and rubber, plus derivatives and products containing them. Any company placing these on the EU market must provide a due diligence statement demonstrating products are not linked to deforestation after December 31, 2020. The regulation demands geographic coordinates at plot level for traceability, with enforcement dates of December 2024 for most operators and December 2025 for smaller enterprises.

CSDDD applies to large EU and non-EU companies operating in the European market. EU companies must have 1,000 employees and €450 million annual turnover; non-EU companies need €450 million annual revenue generated in the EU. The directive requires due diligence on human rights and environmental impacts across entire value chains including direct and indirect suppliers, with companies preparing climate transition plans aligned with Paris Agreement's 1.5°C target. Compliance deadlines cluster around 2027 for larger firms and 2028-2029 for mid-size companies.

EUFLR, adopted by the European Parliament in 2024, bans products made wholly or in part with forced labor from the EU market. Unlike CSDDD, companies don't self-report; instead enforcement occurs through risk-based investigations by competent authorities with power to seize or ban products, expected to begin in 2027. Scope covers any good sold in the EU.

All three require upstream visibility into suppliers and demand evidence beyond certification or audit reports. Yet they differ substantially in scope and standards. EUDR is commodity-specific and geographically bounded, focused on deforestation and requiring geospatial data at plot resolution. CSDDD is horizontally universal-applying across all commodities and industries-but is risk-based and accepts multiple compliance methods including stakeholder consultation, risk screening, audits, and grievance mechanisms. EUFLR is product-focused and relies on behavioral indicators of forced labor and forensic investigation. Compliance timelines also differ: EUDR enforcement is active now, CSDDD deadlines cluster around 2027 and 2028, and EUFLR enforcement begins in 2027, creating phased burden for companies subject to all three.

The Data Challenge: Three Frameworks, One Supplier Network

Multinationals subject to these regulations source from overlapping supplier pools. A chocolate supplier may source cacao from producers EUDR monitors, employ workers in countries flagged by CSDDD risk screening, and operate in jurisdictions with labor law gaps. Treating EUDR, CSDDD, and EUFLR as separate workstreams means collecting overlapping data three times.

Data inefficiency is compounded by evidentiary misalignment. CSDDD audits won't generate plot-level satellite imagery EUDR requires. EUDR plot verification won't answer worker wage questions EUFLR investigators examine.

Yet all three investigations share a common foundation: supplier identification, geographic mapping, and operational transparency. Upstream supplier data aggregation and network

traceability is functionally identical across all three regimes.

Building a Unified EU Due Diligence Program

A unified compliance architecture begins with a single, authoritative supplier record capturing:

The path forward requires moving from regulatory-by-regulatory thinking to supply-chain-by-supply-chain approach. Map the network once. Identify and assess suppliers once. Collect evidence once, structured for multiple frameworks. This treats EUDR, CSDDD, and EUFLR as three lenses on the same supply chain reality.

Next Steps: Turning Visibility Into Compliance

Building unified architecture depends on supply chain visibility. Many companies lack complete maps of Tier 2 and Tier 3 suppliers. Others maintain supplier data in fragmented systems that cannot cross-reference commodity flows, ownership networks, or geographic location simultaneously.

If you are subject to these regulations or planning EU market entry, consolidate your compliance approach now. Start with a supply chain mapping exercise identifying all Tier 1, Tier 2, and Tier 3 suppliers, then layer risk assessment for all three frameworks onto a single network model.

Sayari's platform consolidates primary-source information from 10.6 billion+ primary-source records and 4 billion trade transactions across 250 jurisdictions, enabling companies to map supplier networks, identify beneficial owners, trace commodity flows, and assess risk across multiple regulatory frameworks. To see how Sayari helps build unified EU due diligence programs, request a demo with our experts, or explore our sourcing and procurement use case.

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