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## ESG / SUPPLY CHAIN

# The EUDR Deadline Has Moved – But the Compliance Work Hasn't

By Sayari Analyst Team · Published October 2024

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When the European Commission delayed the EU Deforestation Regulation (EUDR) enforcement date from December 30, 2024 to December 30, 2025, many supply chain teams treated it as permission to pause their compliance programs. That assumption is a critical miscalculation. The delay moved the enforcement deadline, not the compliance obligation itself.

EUDR due diligence requires operators and traders to provide geo-coordinates of production plots for seven regulated commodities—cattle, cocoa, coffee, palm oil, soya, wood, and rubber, plus derived products—and certify those plots were not linked to deforestation after December 31, 2020. This cannot be assembled in ninety days. It requires working directly with upstream suppliers across 3rd and 4th tier smallholders, and pulling together corporate registry verification, trade flow mapping, and satellite-based geolocation confirmation. Companies still in planning mode when enforcement resumes will face a compressed timeline, competing with competitors for the same verification resources.

## What the EUDR Actually Requires

The EU Deforestation Regulation applies to any operator or trader placing covered products on the European market. The seven regulated commodities—cattle, cocoa, coffee, palm oil, soya, wood, and rubber—extend to derived and processed products including leather, footwear, furniture, paper, chocolate, and animal feed.

The core requirement is a "due diligence statement" certifying that products are not linked to deforestation after December 31, 2020. Operators must provide geo-coordinates of the specific plots where commodities were produced—not approximate sourcing regions, but

precise latitude and longitude coordinates tied to each production unit.

For companies sourcing from Ethiopia, Ghana, or Indonesia, this means establishing a direct, verifiable connection between each shipment and the specific land parcels. That traceability chain cannot be automated or assembled from existing documentation.

## Why the Deadline Extension Doesn't Reduce the Compliance Obligation

The December 30, 2025 deadline is now nine months away. The European Commission proposed the 12-month delay in October 2023. The regulation was not weakened—only the enforcement date moved.

A delay in enforcement does not mean a delay in compliance work. It means companies have a shorter window to accomplish the same technical, operational, and governance tasks before penalties apply. For companies that treated the delay as a pause, that window is already closing.

The cost compounds when overlapping regulatory frameworks are considered. Companies must reconcile EUDR due diligence with FinCEN beneficial ownership disclosures, SEC ESG reporting standards, and CBP trade enforcement mandates such as the Uyghur Forced Labor Prevention Act (UFLPA). The data collection infrastructure serves multiple regulatory masters simultaneously. Building it once to satisfy all mandates is more efficient than building it piecemeal, but it requires more time. Companies cannot compress this timeline without sacrificing accuracy.

## What Supply Chain Traceability to EUDR Standard Actually Requires

EUDR compliance requires primary-source verification across four distinct layers of data collection.

Building this infrastructure requires direct integration with suppliers at multiple tiers. It cannot be completed through a single audit or certification program. It requires ongoing data collection, regular updates, and continuous verification.

# Building a Traceability-Ready Sourcing Program

For companies beginning EUDR compliance now, the path requires structured prioritization. Start with commodity scope definition: which regulated commodities are in your portfolio, from which geographies, and what percentage of total volume? Once clear, compile a comprehensive supplier map across all tiers.

Parallel to supplier mapping, assemble geolocation and trade flow data from primary-source trade datasets capturing transaction records, customs filings, and import/export documentation. This requires satellite data sufficient to verify current land cover and detect historical deforestation. Standard supply chain platforms do not provide this infrastructure.

Next, collect and verify country-specific regulatory documentation proving sourcing is legal under local frameworks. This reveals which suppliers have comprehensive documentation and which have gaps—often smaller or informal suppliers representing the highest risk.

Finally, integrate EUDR due diligence data into sourcing decisions and contract terms. Suppliers must understand that purchasing is contingent on maintaining compliance.

Companies beginning now face a 12-24 month timeline with nine months of enforcement already looming. There is no shortcut that preserves regulatory accuracy. The compliance obligation was never paused. The supply chain visibility required to demonstrate EUDR compliance must be built systematically and verified thoroughly. Companies that treated December 30, 2025 as distant are discovering it is now the near deadline they cannot avoid.

Sayari's supply chain mapping platform provides the foundational data infrastructure for EUDR compliance at scale. With access to primary-source corporate registry data across 190+ countries, trade transaction visibility across 4 billion documented transactions, and direct integration with satellite-based geolocation and deforestation monitoring, Sayari enables companies to move from supplier questionnaires to verified plot-level traceability. For companies that need to close the gap between today and December 2025, this is the difference between managed compliance and last-minute scrambling. Request a demo to see how Sayari's platform accelerates EUDR due diligence and builds supply chain visibility that satisfies EUDR, FinCEN, SEC, and CBP compliance requirements simultaneously.

Please visit [sayari.com](https://sayari.com) to learn more.

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