

Responsible
Wood



UPDATE ON THE EU DEFORESTATION REGULATION AND THE RESPONSE THROUGH AUSTRALIAN STANDARDS

October 2025

Responses to the EUDR- PEFC and AS/NZS 4708



The EUDR has now been postponed until December 2026 and likely to undergo significant revision

Integrated changes in the PEFC SFM Benchmark standard 1003

“The amendments to our
SFM standard will ensure the
raw materials coming out
of a PEFC-certified forest also
comply with EUDR requirements”

40 modifications

Australia/New Zealand Standard AS/NZS 4708

Now being amended to better align with the
EUDR

PROPOSED REVISIONS TO AS/NZS 4708

CLAUSE	PROPOSED AMENDMENT
PREFACE	Introduces the reasons and need for the revision.
1.1 SCOPE	Scope expanded to include “tree-based” products to recognize agroforestry.
SECTION 3- DEFINITIONS	
3.1 AGRICULTURAL PLANTATIONS	New definition added to align with the EUDR
3.2 AGRICULTURAL USE	New definition added to align with the EUDR
3.12 FOREST CONVERSION TO AGRICULTURAL USE	New definition added to align with the EUDR
3.13 FOREST CONVERSION TO OTHER LAND USE	New definition added to align with the EUDR
3.14 CONVERSION OF NATURAL ECOSYSTEMS	Existing definition for conversion slightly modified.
3.19 DAMAGED NATIVE VEGETATION	Previous definition for degraded native vegetation slightly modified
3.30 FOREST	Definition for forest slightly modified to align with PEFC and the EUDR. Needs further consideration by the committee.
3.31 FOREST DEGRADATION	Updated definition to align with the EUDR.
3.38 GEOLOCATION	New definition added to align with the EUDR
3.55 NATURALLY REGENERATING FOREST	New definition added to align with the EUDR
3.57 NON-WOOD FOREST PRODUCTS	Existing definition modified to align with PEFC ST:1003
3.58 NON-WOOD PRODUCTS FROM TOF AREAS	New definition to align with PEFC ST:1003
3.60 OLD GROWTH FOREST	Existing definition slightly modified to align with the EUDR. Old growth forests are similar to primary forests as defined in the EUDR.
3.62 OTHER WOODED LAND	New definition added to align with the EUDR
3.67 PLANTATION	Existing definition replaced to align with the EUDR
3.68 PLANTED FOREST	New definition to align with PEFC ST:1003

3.83 SIGNIFICANT BIODIVERSITY VALUES	NOTE 2 UPDATED TO NOTE ALIGNMENT WITH PEFC
3.98 TREES OUTSIDE FORESTS	Existing definition modified to align with PEFC st 1003.
SECTION 4- FOREST MANAGER	
4.3 SCOPE OF THE FOREST MANAGEMENT SYSTEM	Updated to add requirements to maintain geolocation
	New note 7- allowing geolocation to be restricted to active areas.
SECTION 6- PLANNING	
6.1.2 COMPLIANCE OBLIGATIONS	New note 2 added to confirm that compliance obligations include trade and customs.
SECTION 11- SUSTAINABILITY CRITERIA	
11.1.3 FOREST CONVERSION TO AGRICULTURAL USE	EUDR alignment. The forest manager shall not convert forest to agricultural use.
ORIGINAL 11.1.4	EUDR alignment
CONVERSION OF DEGRADED NATIVE VEGETATION TO PLANTATION	The allowance to convert degraded vegetation to plantation has been removed.
11.1.4 FOREST DEGRADATION	EUDR alignment. The forest manager shall not: a) Establish plantations by converting old growth or naturally regenerating forests into plantation forests; or, b) Convert old growth or naturally regenerating forests into other wooded land; or c) Convert old growth forests into planted forests. Note: this does not apply to plantation forests established for protection or ecosystem restoration, as well as forests established through planting or seeding which at stand maturity resemble or will resemble naturally regenerating forests
11.1.5 CONVERSION OF NATURAL ECOSYSTEMS	EUDR alignment. The forest manager shall not afforest ecologically important non-forest ecosystems
11.1.6 FOREST CONVERSION TO OTHER LAND USE	EUDR alignment The forest manager shall demonstrate that the defined forest area does not include areas converted from forest to other land uses after 31 december 2006, (excluding where legal approvals were obtained prior to that date).
11.6.2 INDIGENOUS PEOPLES RIGHTS, RESPONSIBILITIES AND VALUES	No proposed changes, but requirements need to be checked and benchmarked against new environmental rating tools, especially in regard to FPIC. Updates made as necessary.
GLOBAL CHANGE- MULTIPLE CLAUSES	EUDR alignment Replace degraded forest with damaged forest

Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS)



CoC voluntary module- allows an EUDR claim of conformity

- Scope specific to products/product groups intended for EU market
- Species will be required for each product/product group
- DDS system will take the incoming raw materials / components / products and process, making them EUDR aligned with respective PEFC EUDR output claims
- Passing on geolocation and harvesting date data will be responsibility of the supply chain actors

PEFC Data

Task Force conclusions

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Broad consensus that geolocation and harvesting data, deforestation and/or degradation checks will be left to actors in supply chain, with no central role for PEFC

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- PEFC Int has enlisted technology partners, to deliver solutions to CoC organisations, including risk assessment toolkit and geolocation data.
- The overall aim is to create tools that give certified organisations choice and flexibility

New Fact Sheets and Guidance



Responsibilities of non-EU based PEFC chain of custody certified organisations in implementing the PEFC EUDR DDS standard (Informative)



Background

The European Union Regulation on Deforestation Free Products (EUDR) came into force in June 2023 with the objective of preventing deforestation and forest degradation. Under the EUDR, EU-based operators and traders are responsible for ensuring that relevant commodities or products - whether sourced from within or outside the EU - comply with deforestation-free and legality requirements at the production (forest) level. The companies based outside the EU that supply these commodities and products therefore play a crucial role in facilitating EUDR compliance for products harvested outside of the EU.

The PEFC EUDR Due Diligence System (DDS) standard ([PEFC ST 2002-1:2024](#)) was developed as a market tool to be used by both PEFC chain of custody certified EU based and non-EU based companies. It is a module standard to be used together with the PEFC Chain of Custody standard (PEFC ST 2002:2020).

Companies whose relevant commodities and/or products are bound for the EU market can use the PEFC EUDR DDS standard to demonstrate that these commodities/products meet EUDR requirements for due diligence system implementation.

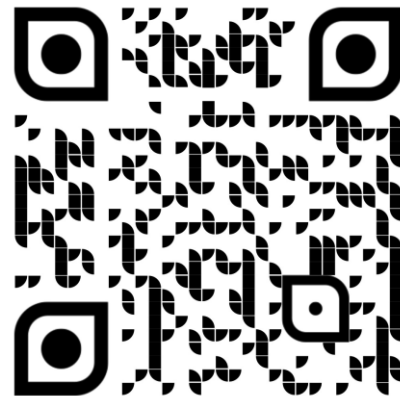
EUDR relevant commodities are timber, natural rubber, coffee, soy, cocoa, palm oil, and cattle. EUDR relevant products are those made of the relevant commodities and their derivatives and are listed in Annex 1 of the EUDR.

By obtaining PEFC EUDR DDS certification and passing on the PEFC-EUDR claim, non-EU companies can assist the EUDR compliance of their EU based customers. The PEFC EUDR DDS standard is an important tool for companies to meet legislative demands and thereby maintain the market access of their relevant products.

The PEFC EUDR DDS standard differentiates requirements for EU based and non-EU based companies.

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