

BEAst Recommendation – Handling of EUDR Requirements in Peppol

Guidelines for Digital Exchange of EUDR Information in Peppol Documents

Background

The EU Regulation on deforestation-free supply chains (EUDR)ⁱ, Regulation (EU) 2023/1115ⁱⁱ, as amended by Regulations (EU) 2024/3234 and (EU) 2025/2650, imposes requirements for traceability and documentation when trading regulated products within the EU. To ensure these requirements are met digitally, it is necessary that relevant EUDR information can be transmitted via the Peppol networkⁱⁱⁱ. This recommendation describes how this can be achieved in a clear and traceable manner by using the `AdditionalItemProperties` element in Peppol documents. EUDR covers products such as wood and wood products, palm oil, cocoa, coffee, soya, beef, and rubber, as well as products containing these raw materials.

The amended EUDR also introduces simplified obligations for certain small and micro operators and clarifies the role of downstream traders, which affects how EUDR identifiers are used and propagated in the supply chain.

Current regulatory status: under Regulation (EU) 2025/2650^{iv}, the EUDR application date has been postponed to 30 December 2026 for large and medium operators and traders, and to 30 June 2027 for natural persons and micro and small enterprises. Newly added products under the July 2026 Annex I update^v are expected to apply from 30 December 2027.

Purpose

The goal of this recommendation is to establish a uniform solution for how suppliers and buyers can exchange EUDR-related information. The focus is on defining the identifiers to be specified for each product subject to EUDR, covering both full due diligence statements (DDS) and simplified declarations:

- **European Union Deforestation Regulation Due Diligence Statement Reference Number:** A unique reference number from TRACES^{vi} relating to a full EUDR due diligence statement. The operator who first places the relevant product on the Union market or exports it is responsible for submitting the DDS where required. Downstream operators and traders should keep and transmit the upstream EUDR identifier needed to evidence coverage of the product.
- **European Union Deforestation Regulation Due Diligence Statement Verification Number:** The verification number issued together with a full DDS in TRACES. Where a DDS Reference Number is used, the corresponding Verification Number should be provided together with it when available. “NA” shall not be used as a substitute for an issued identifier.

- European Union Deforestation Regulation Declaration Identifier: The identifier from TRACES for a simplified EUDR declaration. This may be used instead of a DDS Reference Number and Verification Number where the amended Regulation allows a simplified declaration.

Applicable Standards

This recommendation applies to the following documents:

- Peppol Catalogue (T19)
- Peppol Advanced Despatch Advice (T120)
- Peppol BIS Billing 3.0

These have been considered the most relevant for EUDR information, but the recommendation can also be applied to other documents that include the AdditionalItemProperties group in their document type.

Product scope note: Commission Delegated Regulation (EU) 2026/2102^{vii}, which entered into force on 18 September 2026, amends Annex I to Regulation (EU) 2023/1115. It introduces targeted technical clarifications and changes to the list of relevant products, including additions and removals. Implementations should therefore always check the latest consolidated Annex I and the applicable CN codes before determining whether EUDR information is required.

Recommendation – Implementation in Peppol

Peppol Catalogue (T19) and Peppol Advanced Despatch Advice (T120)

For Peppol Catalogue (T19), Peppol Advanced Despatch Advice (T120), and other transactions with the AdditionalItemProperties group (except Peppol BIS Billing 3.0), the following applies for the elements under AdditionalItemProperties:

European Union Deforestation Regulation Due Diligence Statement Reference Number

- The Due Diligence Statement (DDS) Reference Number value can be set to NA (Not Applicable) in the European Union Deforestation Regulation (EUDR) Information System (TRACES) only in the cases foreseen under the applicable Union and national guidance, for example where an operator or trader is exempt from submitting a full DDS and a simplified declaration or other identifier is used instead. “**NA**” shall not be used as a general substitute where a valid Reference Number, Verification Number or Declaration ID has been issued.

cbc:Name	cbc:NameCode	cbc:Value
EUDR Reference Number	EUDRReferenceNumber	14-character reference number from TRACES

European Union Deforestation Regulation Due Diligence Statement Verification Number

The Due Diligence Statement (DDS) **Verification Number** should be provided together with the corresponding DDS Reference Number when a full DDS is used and the number is available

from TRACES. Where the upstream information is provided through a simplified declaration, the EUDR Declaration ID should be used instead. If a verification number is not available or not applicable in a specific downstream scenario, the parties should agree how this is represented in Peppol; “NA” should not be used as a substitute for an issued identifier.

cbc:Name	cbc:NameCode	cbc:Value
EUDR Verification Number	EUDRVerificationNumber	8-character verification number from TRACES

European Union Deforestation Regulation Declaration Identifier

The European Union Deforestation Regulation Declaration Identifier is the unique reference number assigned to a company’s EUDR due diligence statement so that customs and authorities can track and verify that specific declaration in the EU system.

cbc:Name	cbc:NameCode	cbc:Value
EUDR Declaration ID	EUDRDeclarationIdentifier	Identifier from TRACES for a simplified EUDR declaration

XML Example:

```
<cac:AdditionalItemProperty>
  <cbc:Name>EUDR Reference Number</cbc:Name>
  <cbc:NameCode>EUDRReferenceNumber</cbc:NameCode>
  <!-- 14-character reference number from TRACES -->
  <cbc:Value>25SEAMDIS29386</cbc:Value>
</cac:AdditionalItemProperty>
<cac:AdditionalItemProperty>
  <cbc:Name>EUDR Verification Number</cbc:Name>
  <cbc:NameCode>EUDRVerificationNumber</cbc:NameCode>
  <!-- 8-character verification number from TRACES -->
  <cbc:Value>RNV5IPXH</cbc:Value>
</cac:AdditionalItemProperty>
<cac:AdditionalItemProperty>
  <cbc:Name>EUDR Declaration ID</cbc:Name>
  <cbc:NameCode>EUDRDeclarationIdentifier</cbc:NameCode>
  <!-- Declaration Identifier from TRACES for a simplified EUDR declaration-->
  <cbc:Value>26SEBGHRT58291</cbc:Value>
```

For operators placing products on the Union market under a full due diligence statement, the EUDR Reference Number and EUDR Verification Number shall be provided together for each relevant batch or consignment. For operators making use of a simplified EUDR declaration under the amended Regulation (EU) 2023/1115, the EUDR Declaration ID shall be provided instead of a Reference and Verification Number. Downstream traders should, where applicable, propagate the identifier (Reference/Verification Number or Declaration ID) received from their upstream supplier.

In this context, “where applicable” means that the obligation depends on the party’s role and position in the relevant supply chain, as well as on whether the product is covered by a full DDS, a simplified declaration, or an upstream identifier that must be retained and passed on. The European Commission’s EUDR supply chain infographics^{viii} illustrate these role-specific scenarios for operators and traders across the relevant commodity supply chains; they should be used as explanatory guidance when determining which identifier is applicable in a particular transaction.

Peppol BIS Billing 3.0

Peppol BIS Billing 3.0 lacks a more advanced structure for AdditionalItemProperties, so the name must be used as the code value as follows:

European Union Deforestation Regulation Due Diligence Statement Reference Number

cbc:Name	cbc:Value
EUDRReferenceNumber	14-character reference number from TRACES

European Union Deforestation Regulation Due Diligence Statement Verification Number

cbc:Name	cbc:Value
EUDRVerificationNumber	8-character verification number from TRACES

European Union Deforestation Regulation Declaration Identifier

cbc:Name	cbc:Value
EUDRDeclarationIdentifier	Identifier from TRACES for a simplified EUDR declaration

XML Example:

```
<cac:AdditionalItemProperty>
  <cbc:Name>EUDRReferenceNumber</cbc:Name>
  <!-- 14-character reference number from TRACES -->
  <cbc:Value>25SEAMDIS29386</cbc:Value>
</cac:AdditionalItemProperty>
<cac:AdditionalItemProperty>
  <cbc:Name>EUDRVerificationNumber</cbc:Name>
  <!-- 8-character verification number from TRACES -->
  <cbc:Value>RNV5IPXH</cbc:Value>
</cac:AdditionalItemProperty>
```

```
<cac:AdditionalItemProperty>
  <cbc:Name>EUDRDeclarationIdentifier</cbc:Name>
  <!-- Identifier from TRACES for a simplified EUDR declaration-->
  <cbc:Value>26SEBGHRT58291</cbc:Value>
</cac:AdditionalItemProperty>
```

Prerequisites

- The supplier has access to the necessary EUDR details and can specify these in their business system.
- The buyer's system can receive and interpret AdditionalItemProperties as defined here.
- The parties have agreed that these properties will be used for relevant product purchases.

The supplier has, where required, registered either a valid DDS or a simplified EUDR declaration in the TRACES system^{ix} before the products are placed on the market. The corresponding EUDR identifier — Reference and Verification Number together, or Declaration ID — shall be provided consistently for the same DDS or declaration.

Other Information

This recommendation is general and not tied to any specific IT system. If future legislation or industry standards require additional EUDR-related information, these should also be added as AdditionalItemProperties or equivalent structure in Peppol. For questions regarding implementation, please contact the relevant Peppol authority or system provider.

Further Development

Should EUDR requirements expand in the future or cover more product areas, there may be a need for additional properties. One possible development is that these codes could also be added to the code list GS1 PackagingMarkedLabelAccreditationCode, which would strengthen traceability and enable even clearer labelling of affected products. Future changes to the EUDR, including further simplification measures or additional identifiers for operators and traders, may require new properties such as flags indicating whether a full DDS or a simplified declaration is used for a given item or batch.

Summary

By using AdditionalItemProperties for the European Union Deforestation Regulation Due Diligence Statement Reference Number, Verification Number and, where applicable, the Declaration Identifier, EUDR requirements are managed in a traceable and consistent way in Peppol. This facilitates control, follow-up, and reduces the risk of misunderstandings between business parties.

References

- ⁱ European Commission: Directorate-General for Environment, Regulation on deforestation-free products, European Commission, 2026, https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en
- ⁱⁱ European Parliament and Council of the European Union, Regulation (EU) 2023/1115 of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, Official Journal of the European Union, 2023, <https://eur-lex.europa.eu/eli/reg/2023/1115/oj/eng>
- ⁱⁱⁱ OpenPeppol AISBL, Peppol Documentation, OpenPeppol AISBL, 2026, <https://peppol.org/documentation/>
- ^{iv} European Parliament and Council of the European Union, Regulation (EU) 2025/2650 of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders, Official Journal of the European Union, 2025, <https://eur-lex.europa.eu/eli/reg/2025/2650/oj/eng>
- ^v European Commission: Directorate-General for Environment, Commission updates product scope and digital tools to support implementation of EU Deforestation Regulation, European Commission, 2026, https://environment.ec.europa.eu/news/commission-updates-product-scope-and-tools-support-eudr-2026-07-13_en
- ^{vi} European Commission, TRACES NT, European Commission, 2026, <https://webgate.ec.europa.eu/tracesnt/login>
- ^{vii} European Commission, Commission Delegated Regulation (EU) 2026/2102 of 13 July 2026 amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products, Official Journal of the European Union, 2026, https://eur-lex.europa.eu/eli/reg_del/2026/2102/oj/eng
- ^{viii} European Commission: Directorate-General for Environment, UNEP-WCMC, Womack, L., Outhwaite, O., Mark, J. et al., EUDR supply chain infographics (5th edition) – Understanding your position in beef, cocoa, coffee, palm oil, rubber, soy and wood supply chains, Publications Office of the European Union, 2026, <https://data.europa.eu/doi/10.2779/3712992>
- ^{ix} European Commission: Directorate-General for Health and Food Safety, TRACES, European Commission, 2026, https://food.ec.europa.eu/horizontal-topics/traces_en