

# Due Diligence Standard

v2.0

For Stakeholder  
Consultation

Preferred  
by Nature  
Certification



Title	Due Diligence Standard
Document code	PBN-03
Scope	Global
Status of document	Draft
Version	2.0
Date	8 September 2025
Official language(s)	English
Approval body	Preferred by Nature
Contact person	Christian Sloth
Contact email	csloth@preferredbynature.org



Preferred by Nature has adopted an [Open Source Policy](#) to share what we develop whenever this may contribute to advancing sustainability.

This work is published under the Creative Commons Attribution Share-Alike 3.0 Unported license. See the license conditions here: <http://creativecommons.org/licenses/by/3.0/>. Please note that for any use of the Standard, you must credit Preferred by Nature and include a visible link to our website [www.preferredbynature.org](http://www.preferredbynature.org).

The name Preferred by Nature™ as well as the Preferred by Nature Seal are trademarks owned and protected by Preferred by Nature. Any usage of these names, visual elements or related claims requires prior approval from Preferred by Nature.

Preferred by Nature has adopted an [Open Source Policy](#) to share what we develop whenever this may contribute to advancing sustainability.

# Contents

<b>Introduction .....</b>	<b>4</b>
<b>Scope .....</b>	<b>4</b>
<b>Using this Standard for EUDR alignment .....</b>	<b>4</b>
<b>Direct vs. indirect control: DDS application .....</b>	<b>5</b>
<b>Preferred by Nature Certification .....</b>	<b>6</b>
<b>Terms and definitions .....</b>	<b>8</b>
<b>Requirements for Due Diligence .....</b>	<b>9</b>
<b>Annex. EUDR module .....</b>	<b>16</b>

# Introduction

This Standard sets requirements for Due Diligence System (DDS) that ensures materials originate from sources where risks of non-conformance with applicable requirements have been identified, evaluated, and either demonstrated to be negligible or effectively mitigated through documented and verifiable actions.

As the foundation for Due Diligence Certification under the Preferred by Nature Certification (PBNC) programme, the DDS promotes a consistent, risk-based approach for all types of supply-chain actors and operational contexts. It supports legal compliance, sustainability performance, and deforestation-free sourcing across sectors and geographies.

When implemented effectively, the DDS ensures that:

- Only products with negligible risk are treated as conforming with the relevant requirements,
- Supply-chain actors support traceability where necessary,
- Risks are assessed and mitigated, and
- Non-conforming material is not mixed with conforming material in the supply chains.

This Standard is aligned with the EU Deforestation Regulation (EUDR) and can be used to meet its due-diligence requirements, by adding the indicators of the EUDR Module in **Annex A**.

## Scope

This Standard applies to organisations across the supply chain — regardless of size, sector, or regulatory obligations — and provides a robust, risk-based framework for sourcing products with negligible risk of non-conformance with defined requirements. Organisations located at different points in the supply chain, have different opportunities for risk mitigation, which in turn affects the available options for exercising due diligence.

The generic due diligence requirements found in the main section of this standard, can be used by all companies that wants to have their due diligence systems certified.

Companies within the EU that also want to be certified against additional EUDR-aligned requirements, must also conform with the requirements of Annex A: EUDR Module, in addition to the generic due diligence requirements.

## Using this Standard for EUDR alignment

**Inside the EU**, the legal obligation to implement a Due Diligence System sits with the company that places products on the EU market (the non-SME “Operator”) or makes them available on the market (the non-SME Trader).

These entities must implement a DDS that ensures (i) products are legally produced, (ii) they are deforestation-free, (iii) collection of plot-level geolocation data, and (iv) that products are covered by a due diligence statement.

In practice, Operators can integrate their DDS with Chain of Custody controls so geolocation and other required information are captured. In the PBNC system, this means implementing DDS requirements of this Standard, along with our Systems Standard (PBN-02), our Chain of Custody Standard (PBN-05), and ensuring that products (at minimum) conform with the Regulatory Scope requirements of the Sustainability Framework.

This Standard contains a set of generic due diligence requirements that may be used by any organisation, as well as **Annex A with EUDR-specific requirements**, which is to be used in combination with the generic Due Diligence Standard.

Organisations **outside the EU** that do not have direct legal obligations under the EUDR can, when selling to EU Operators, support EU customers providing clear evidence that the products they supply are legal and deforestation-free, together with geolocation data and any other information needed for the buyer's risk assessment. This can be achieved by implementing a risk-based DDS or by sourcing already certified materials.

#### Relation to other PBNC documents

This Standard is used alongside other normative documents of the programme (see **Box 1**), including the Sustainability Framework, the System Standard and the Chain of Custody Standard.

## Direct vs. indirect control: DDS application

The level of control an organisation has over its sourcing and supply chain operations defines the type of actions they can take to manage risks. Preferred by Nature recognises that companies operate under different business models, and the Due Diligence Standard has been designed to accommodate both organisations with direct control over production at the source and those without such control. It is therefore important to define the type of organisation applying a due diligence approach, to understand what approach to due diligence is possible.

**Organisations with direct control**, such as vertically integrated companies or those sourcing from production units, they have direct access to, can collect and verify data directly from the source. This includes obtaining geolocation data and, where applicable, production timeframes. These organisations can also conduct on-site risk assessments and implement risk mitigation actions directly at land-use level where risks have been identified.

**“Direct Control Organisations”**, therefore are well placed to implement a due diligence system, where they have access to relevant information, can assess risks, and have the ability to mitigate identified risks, directly at the production level.

In contrast, **organisations without direct control** over production have limited ability to access information and address risks in the supply chain. Therefore, this type of organisation is much more limited in their ability to implement a due diligence system. Often **“Indirect Control Organisations”**,



are confined to implement a DDS based on the information they can access by working with their suppliers. This also means that the access to information, ability to assess and mitigate risks, will depend on the level of access they are able to achieve through their suppliers.

Where supplier control is limited, supplier systems are incomplete, or supply chains are complex or opaque, effective risk assessment and mitigation may only be possible by avoiding the supply (or pausing purchases until controls improve) or by sourcing from different supply chains with credible third-party certification and traceability that demonstrate conformance.

In the case of Preferred by Nature Certification of an Indirect Control Organisation under this Due Diligence Standard, it is normally assumed and expected that the only credible option for such organisations to mitigate risks is to purchase material already certified under credible schemes. This ensures that the material originates from conforming sources and is not mixed with other material in the supply chain. Exceptions may be possible, for example highly integrated supply chains or in other exceptional circumstances.

## Direct vs Indirect Control in Due Diligence

### DIRECT CONTROL ORGANISATIONS



- Access to production units
- Can collect geolocation & production data
- Conduct on-site risk assessments
- Implement mitigation actions directly

### INDIRECT CONTROL ORGANISATIONS



- Limited access to production info
- Depend on supplier-provided data
- Risk mitigation normally via third-party certification
- May need to pause sourcing if risks cannot be mitigated

# Preferred by Nature Certification

The DDS Standard operates in concert with other PBNC normative documents: the Sustainability Framework (which defines the performance requirements for Sustainability and Regulatory Scopes), the Chain of Custody (CoC) Standard (which governs traceability, segregation/mass balance, and external claims), the System Standard (which covers the quality and general system-related requirements), Terms and Definitions, and applicable policies (e.g., the Policy of Association and technical policies relevant to specific risks). Together, these documents provide the basis for evaluation, decision-making, and the use of PBNC claims.

A list of the PBNC normative documents is provided in **Box 1**.

All parts of this document are normative unless otherwise stated. The most recent version of any referenced document shall apply unless otherwise specified.

## Box 1.

### Normative Documents for Preferred by Nature Certification

#### **PBN-01. Sustainability Framework**

Establishes the principles, criteria, and indicators that land-use managers must follow to demonstrate responsible, sustainable practices, as well as social requirements for supply chain entities.

#### **PBN-02. System Standard**

Sets out generic quality system requirements applicable to all Preferred by Nature certified operations.

#### **PBN-03. Due Diligence Standard**

Defines requirements for supplier collaboration, supply chain information, risk assessment, and mitigation for due diligence and includes a EUDR specific annex.

#### **PBN-04. Seal Use Standard**

Sets requirements and conditions for using the PBN Seal.

#### **PBN-05. Chain of Custody Standard**

Specifies requirements for chain of custody models and traceability systems used to manage claims and track products throughout the supply chain.

#### **PBN-06. Terms and Definitions**

Provides definitions and concepts used in the Preferred by Nature Certification programme.

#### **PBN-07. Pesticides Policy**

Defines PBN's policy on the use of pesticides.

#### **PBN-08. GMO Policy**

Defines PBN's policy on the use of Genetically Modified Organisms (GMOs).

## Version history

Version 1.0 | 25 September 2020

Version 1.1 | 3 June 2021

Version 1.2 | 15 December 2021

Version 1.3 | 13 January 2023

Version 1.4 | 13 November 2023

Version 2.0 | This draft

# Terms and definitions

## Conformance

Conformance, in general, means fulfilment of specified requirements. In PBNC, conformance means meeting the applicable indicators of the Preferred by Nature Sustainability Framework and the applicable requirements of other relevant PBNC normative documents, such as this standard.

## Due Diligence

In the context of Preferred by Nature Certification, Due Diligence (DD) is defined as the set of actions taken, as part of a risk-based approach, by organisations to ensure a low risk of non-conformities with the applicable requirements of the Sustainability Framework for the material used as input for any products traded under the programme.

## Due Diligence System (DDS)

A system of procedures and measures implemented to ensure that due diligence is exercised. The Due Diligence System (DDS) may consist of a policy, written procedures, and guidelines describing the due diligence process in detail.

## Geolocation

The geographic coordinates (typically latitude and longitude) that identify a specific plot of land where a product was produced or harvested.

## Negligible risk

A level of risk applied to a product that shows no cause for concern regarding its conformance with a specific set of requirements after a full assessment has been conducted and, where necessary, appropriate mitigation measures have been applied.

## Non-negligible risk

A conclusion following a risk assessment indicating that there is a risk that illegal or otherwise non-conforming products may enter the supply chain. In such cases, risk mitigation is required.

## Organisation

An individual, company, or legal entity responsible for meeting the requirements of this Standard. Organisation covers all legal entities owned or managed directly by that legal entity.

## Risk mitigation

Actions taken to reduce or eliminate identified non-negligible risks to a level where there is no cause for concern regarding conformance with applicable requirements.

## Supplier

An entity or individual that provides goods, products, services, or raw materials to another organisation, individual, or entity, typically as part of a business transaction or contractual arrangement.



### Time and date of production

The date or period during which the product or raw material was produced, harvested, or collected, as relevant for determining legal compliance or conformance with EUDR traceability requirements.

### Traceability

The ability to track the origin, movement, and handling of a product or material through specified stages of production, processing, and distribution.

# Requirements for Due Diligence

#	Requirements	Guidance
<b>1</b>	<b>Product origin information</b>	
<b>1.1</b>	<p>For all material within the scope of the DDS, the following information shall be collected, recorded, and verified:</p> <ul style="list-style-type: none"> <li>(a) Product/material description and composition</li> <li>(b) The origin of the material</li> <li>(c) Certification/verification status (if applicable)</li> <li>(d) Supplier identity; and</li> <li>(e) Species' common and scientific names (for wood products).</li> </ul>	<p>The organisation shall collect and maintain supply chain information for each product within the scope of the DDS.</p> <p>This includes the basic characteristics of the product, its volume, origin, supplier identity, and any applicable certification status. Such information is required to ensure traceability, support risk assessment, and confirm that materials conform to the Sustainability Framework.</p> <p>The level of detail relevant to the origin information shall depend on the traceability system applied to the specific material or product.</p>
<b>1.2</b>	<p>Information about the origin and supply chain is collected in sufficient detail to:</p> <ul style="list-style-type: none"> <li>(a) Confirm the origin of the material</li> <li>(b) Assess risks of non-conformance at the land-use level</li> <li>(c) Assess risks of mixing non-conforming products at any point in the supply chain; and</li> <li>(d) Effectively mitigate those risks.</li> </ul>	<p>Information provided shall clearly identify and describe all relevant entities in the supply chain, including primary producers, intermediaries, and processors.</p> <p>Documentation shall specify the locations and activities involved in production and processing, enabling users to accurately trace raw materials or products to their origins.</p> <p>This clarity supports effective risk assessment by highlighting potential risks related to origin, legality, environmental impact, or social responsibility.</p> <p>Furthermore, detailed and conclusive information enables targeted and efficient actions to mitigate identified risks.</p>

#	Requirements	Guidance
<b>2</b>	<b>Risk assessment</b>	
<b>2.1</b>	For every in-scope product, material, and supply chain, the organisation uses a current, PBN-approved risk assessment to evaluate the risk of non-conformance with applicable PBN requirements.	<p>Where available, the organisation must use the most recent Preferred by Nature–approved National Risk Assessment as the primary information source. In its absence, the organisation may undertake a proportionate, documented assessment for each product, material, and sourcing area within scope, and ensure approval by PBN.</p> <p>The assessment must identify material risks of non-conformance, assign a risk judgement (negligible or non-negligible), set out the rationale, and reference the sources consulted.</p> <p>Where the organisation has direct control over the supply chain and verified access to primary information (e.g., producer sites, records, geolocation), it may rely on a concise, site- and supplier-level assessment focused on evidence observed on the ground; a national-level risk assessment is not required beyond reference, where available. The assessment is expected to record the risks identified, their relevance, the evidence obtained and the current status.</p>
<b>2.2</b>	<p>Risk assessments are based on current and verifiable information and address:</p> <ul style="list-style-type: none"> <li><b>(a)</b> Risks of non-conformance with the Sustainability Framework indicators applicable to land-use operations; and</li> <li><b>(b)</b> Risks of mixing or contamination with non-conforming products.</li> </ul>	<p>Risk assessments shall use current, verifiable information reflecting the actual status of products, sourcing areas, and supply chains. Where the organisation has direct control and primary access to information (e.g., on-site observations, producer records, geolocation), the assessment may rely mainly on this site- and supplier-level evidence; national or sector analyses serve only as brief context.</p> <p>Where such access is limited, the assessment shall be supplemented with credible secondary sources, and supplier-provided data shall be independently verifiable.</p> <ul style="list-style-type: none"> <li><b>(a)</b> Production/harvest risks. Assess conformance with relevant Sustainability Framework indicators — legality, deforestation/conversion, human rights,</li> </ul>

#	Requirements	Guidance
		<p>and other material issues — considering both inherent (country/region) and site-specific risks, with supporting evidence and a clear risk judgement.</p> <p><b>(b)</b> Supply-chain mixing risks. Assess the risk of non-conforming material entering or mixing in the chain by evaluating traceability, segregation or mass-balance controls, transparency, and the reliability of supplier systems, documentation, and certifications.</p> <p>Where either risk is non-negligible, the organisation shall define, implement, and document mitigation before accepting material as conforming.</p>
2.3	<p>Where products are sourced through a supplier’s own due diligence system, it is ensured that:</p> <p><b>(a)</b> The materials or products present negligible risk of non-conformance with the relevant indicators of the Sustainability Framework.</p> <p><b>(b)</b> There is negligible risk of mixing conforming and non-conforming materials throughout the supply chain; and</p> <p><b>(c)</b> Any identified weaknesses, gaps, or risks in the supplier’s system are mitigated in a timely manner.</p>	<p>When relying on a supplier’s due diligence system (DDS) to demonstrate conformance, the organisation must conduct a structured and critical evaluation of that system.</p> <p>The supplier’s DDS must deliver negligible risk against relevant Sustainability Framework indicators. Verify effective procedures for risk identification, traceability (including geolocation), and mitigation covering legality, deforestation/conversion-free production, and other material sustainability issues. Confirm robust controls prevent mixing of conforming and non-conforming material throughout the chain. Acceptable evidence includes procedures, audit reports, traceability records, and recognised certifications, but certificates alone are not sufficient.</p> <p>The organisation shall have a direct relationship with, or demonstrable access to, the supplier’s DDS; it must be transparent and available on request. Where gaps exist (e.g. missing geolocation, unclear risk judgements, weak controls), implement additional mitigation before acceptance. Document the evaluation and mitigation, and review and update them as conditions change.</p> <p>If the supplier’s system does not provide adequate assurance of low risk, or if access to</p>

#	Requirements	Guidance
		the system is limited or indirect, the organisation must not rely on it to demonstrate conformance with the certification requirements.
<b>3</b>	<b>Risk mitigation</b>	
<b>3.1</b>	<p>Where risks are identified:</p> <ul style="list-style-type: none"> <li>(a) Appropriate mitigation measures are identified and implemented.</li> <li>(b) Mitigation measures are justified and recorded; and,</li> <li>(c) The effectiveness of risk mitigation actions is evaluated and documented.</li> </ul>	<p>When a risk is detected, the organisation shall select mitigation measures that directly reduce or eliminate the cause of the risk and implement them as soon as practicable. If the initial measure proves insufficient, it shall be strengthened or replaced until the risk is effectively managed.</p> <p>Example: A farm's health-and-safety review identifies that pesticide sprayers lack personal protective equipment. The manager purchases certified respirators, gloves, and coveralls within a month, trains all sprayer operators, and records invoices, training logs, and photographs. During the next spray cycle, auditors observe workers using the equipment and verify that no pesticide-related incidents appear in the accident log for the following quarter, demonstrating that the risk has been effectively mitigated.</p> <p>To demonstrate the effectiveness of risk-mitigation measures across the supply chain, the organisation is expected to convert each identified risk into a measurable target and monitor that target using methods appropriate to the level of risk.</p> <p>Where results indicate that a measure is only partially effective, it must be strengthened; where it is ineffective, it must be replaced or the source suspended until a suitable measure is in place.</p>
<b>3.2</b>	Before products are accepted as conforming with relevant PBN standard requirements, all identified risks shall be effectively mitigated.	This requirement ensures that material of unknown origin, or material identified as posing a risk with respect to one or more relevant Sustainability Framework requirements, is not used by the organisation as input for any products carrying Preferred by

#	Requirements	Guidance
		Nature certification claims without appropriate risk mitigation.
3.3	<p>Where management of risks depends on supplier cooperation:</p> <p>(a) It is ensured that the supplier agrees to cooperate and understands their role and responsibilities in managing risks.</p> <p>(b) Suppliers are verified to ensure that their responsibilities are implemented as agreed; and,</p> <p>(c) Corrective action is taken if suppliers fail to comply.</p>	<p>When supplier cooperation is critical to effective risk management, the organisation must:</p> <ul style="list-style-type: none"> <li>Clearly define and communicate the specific expectations, responsibilities, and actions required from each supplier to manage identified risks.</li> <li>Obtain explicit confirmation from suppliers that they understand their responsibilities and agree to implement the required actions.</li> <li>Establish a system to verify and document suppliers' adherence to the agreed actions, including regular checks, supplier reports, or audits as necessary.</li> <li>Promptly address any cases of supplier non-compliance through documented corrective actions. Depending on the severity, corrective actions may include follow-up communications, formal warnings, additional training, suspension of sourcing, or termination of the supplier relationship.</li> </ul>
3.4	<p>Where certification schemes other than PBN are used to mitigate risks, it shall be ensured that:</p> <p>(a) The certification scheme provides assurance of negligible risk against all relevant Sustainability Framework indicators.</p> <p>(b) The scheme prevents mixing with non-conforming materials.</p> <p>(c) Any gaps between the PBN requirements and the other certification scheme are identified and addressed; and</p> <p>(d) Certification claims made are valid, accurate, and specific to the products being purchased.</p>	<p>The organisation is required to evaluate any certification or verification scheme used, considering its ability to address relevant Sustainability Framework requirements and its capacity to provide appropriate levels of supply chain information, control, and quality assurance. Where significant gaps or weaknesses are identified within the scheme, these must be mitigated.</p> <p>Organisations must be aware that some certification schemes use mass-balance or credit system models, which allow the mixing of certified and non-certified materials. Each type of material or model permitted by the scheme may need to be evaluated separately.</p> <p>Guidance for (c): A certification or verification scheme cannot</p>

#	Requirements	Guidance
		automatically be considered proof that products or materials are low risk. The scope, validity, and integrity of certification or verification claims must be evaluated to ensure that the system can effectively address all relevant indicators of the Sustainability Framework.
3.5	If a supplier exhibits serious or repeated non-conformances, sourcing from that supplier is suspended. Procurement may resume only once it has been confirmed that the non-conformances have been fully corrected.	<p>When major or repeated non-conformances occur within the supply chain, the organisation is expected to:</p> <ul style="list-style-type: none"> <li>Clearly identify and document cases of significant or persistent non-conformance involving producers or suppliers.</li> <li>Immediately suspend sourcing of materials from the affected supplier, producer, or geographical area.</li> <li>Implement robust corrective actions to fully mitigate the identified risks, documenting each step taken.</li> <li>Resume sourcing only after conclusive evidence demonstrates that the risks have been effectively mitigated and compliance restored.</li> <li>Maintain clear records of non-conformances, corrective actions, and decisions regarding sourcing suspension and resumption.</li> </ul>
4	<b>Ensuring robust Due Diligence</b>	
4.1	All information necessary to demonstrate that due diligence has been exercised, and that no, or only a negligible, risk was identified, shall be communicated to downstream supply-chain entities upon request.	Organisations must be able to share clear and complete records — such as risk assessments, mitigation actions, and traceability data — that demonstrate due diligence and support a negligible-risk conclusion. This information is expected to be organised, accessible, and provided promptly when requested by downstream supply-chain partners or authorities.
4.2	Where relevant, suppliers collaborate with the organisation to a degree that enables access to necessary information and supports the effective assessment and mitigation of risks.	Supplier collaboration is essential for the organisation to implement an effective Due Diligence System. Where relevant, suppliers must provide access to accurate and timely information that enables the organisation to



#	Requirements	Guidance
		<p>assess and mitigate risks of non-conformance. This includes transparency regarding sourcing practices, traceability to origin, and provision of supporting documentation necessary to evaluate risk levels.</p> <p>The organisation must clearly communicate expectations to suppliers, specifying the information required and how it will be used. These expectations are expected to be formalised in agreements or contracts wherever possible. In some cases, collaboration may involve additional actions, such as:</p> <ul style="list-style-type: none"> <li>• Sharing geolocation data</li> <li>• Participating in audits</li> <li>• Implementing agreed mitigation measures.</li> </ul> <p>If a supplier is unwilling or unable to cooperate at the required level, the organisation must consider this a risk factor. In such cases, additional mitigation measures must be applied, or sourcing from that supplier discontinued. The level of cooperation shall be documented and factored into the overall risk assessment and conclusions.</p>

# Annex. EUDR module

The following table provides indicators aligned with the Due Diligence System (DDS) requirements of the EU Deforestation Regulation (EUDR). The EUDR Module is consistent with the generic DDS requirements and must be used in addition to them.

Op. = Operator

#	Requirements	EUDR Ref.	Non-SME Op.	SME Op.	Simplified DDS	Non-SME Trader	SME Trader
<b>EUDR 1</b>	<b>Procedures and responsibilities</b>		✓	✓	✓	✓	
<b>EUDR 1.1</b>	In order to exercise due diligence in accordance with the EUDR, an organisation shall establish and maintain a framework of procedures and measures to ensure that the relevant products it places on the market or exports comply with the requirements of the EUDR.	Art. 12 (1)	✓	✓	✓	✓	
<b>EUDR 1.2</b>	For non-SME operators, the procedures shall include an independent audit function to check the internal policies, controls, and procedures, including the effectiveness of risk mitigation actions.	Art. 11(2)	✓			✓	
<b>EUDR 1.3</b>	The organisation shall designate a compliance officer at the management level, who will be responsible for ensuring the effective implementation of, and compliance with, all aspects of the EUDR.	Art. 11(2)	✓			✓	
<b>EUDR 2</b>	<b>Product origin and information</b>		✓	✓	✓	✓	✓
<b>EUDR 2.1</b>	Information is collected: (a) For quantity of the products: Organisations shall express quantities as: <ul style="list-style-type: none"> <li>Kilograms of net mass and, where applicable, in the supplementary unit set out in Annex I to Council Regulation (EEC) No. 2658/87 corresponding to the indicated Harmonised System code.</li> <li>In all other cases, the quantity shall be expressed in net mass or, where applicable, in volume or number of items.</li> </ul> (b) Geolocation of all plots of land where the relevant commodities that the product	Art. 9 (1)	✓	✓	✓	✓	

#	Requirements	EUDR Ref.	Non- SME Op.	SME Op.	Simpli- fied DDS	Non- SME Trader	SME Trader
	contains or has been made using, were produced. <b>(c)</b> Date and time range of production.						
<b>EUDR 2.2</b>	SME traders shall collect and keep the following information relating to the relevant products they intend to make available on the market: <b>(a)</b> The name, registered trade name or registered trademark, postal address, email address, and, if available, web address of the operators or traders who have supplied the relevant products to them, as well as the reference numbers of the due diligence statements associated with those products. <b>(b)</b> The name, registered trade name or registered trademark, postal address, email address, and, if available, web address of the operators or traders to whom they have supplied the relevant products.	Art. 5(3)					✓
<b>EUDR 2.3</b>	The organisation shall obtain the reference number of the due diligence statement associated with the product, if applicable.	Art. 5(3)a Art. 4(8) Art. 4(9)	✓	✓	✓	✓	✓
<b>EUDR 2.4</b>	Information about products and supply chains shall be: <ul style="list-style-type: none"> <li>Adequately conclusive and verifiable information demonstrating that the relevant products are deforestation-free.</li> <li>Adequately conclusive and verifiable information demonstrating that the relevant commodities have been produced in accordance with the relevant legislation of the country of production.</li> </ul>	Art. 9(1) g&h	✓		✓	✓	
<b>EUDR 3</b>	<b>Risk assessment</b>		✓		✓	✓	
<b>EUDR 3.1</b>	On the basis of the collected information and documentation, operators shall carry out a risk assessment to determine whether there is a risk that the relevant products intended to be placed on the market or exported are non-compliant with the EUDR obligations.	Art. 10(1)	✓			✓	

#	Requirements	EUDR Ref.	Non-SME Op.	SME Op.	Simplified DDS	Non-SME Trader	SME Trader
<b>EUDR 3.2</b>	<p>The risk assessment of relevant EUDR Sustainability Framework indicators shall, at a minimum, take into consideration the following criteria:</p> <ul style="list-style-type: none"> <li>(a) The assignment of risk to the relevant country of production or relevant sub-national level, in accordance with Article 29 of the EUDR.</li> <li>(b) The presence of forests in the country of production or relevant sub-national level.</li> <li>(c) The presence of indigenous peoples in the country of production or relevant sub-national level.</li> <li>(d) Consultation and cooperation in good faith with indigenous peoples in the country of production or relevant sub-national level.</li> <li>(e) The existence of duly reasoned claims by indigenous peoples, based on objective and verifiable information, regarding the use or ownership of the area used for the purpose of producing the relevant commodity.</li> <li>(f) The prevalence of deforestation or forest degradation in the country of production or relevant sub-national level.</li> <li>(g) The complexity of the relevant supply chain and the stage of processing of the relevant products, in particular difficulties in connecting relevant products to the plot of land where the relevant commodities were produced.</li> <li>(h) The source, reliability, validity, and links to other available documentation of the supply-chain information.</li> <li>(i) The levels of corruption in the country of production.</li> <li>(j) The prevalence of document and data falsification.</li> <li>(k) The lack of law enforcement in the country of production.</li> <li>(l) Violations of international human rights, armed conflict, or the presence of sanctions imposed by the UN Security Council or the</li> </ul>	Art. 10(2)	✓			✓	

#	Requirements	EUDR Ref.	Non- SME Op.	SME Op.	Simpli- fied DDS	Non- SME Trader	SME Trader
	<p>Council of the European Union in the country of production.</p> <p><b>(m)</b> Conclusions of the meetings of the European Commission expert groups supporting the implementation of this Regulation, as published in the Commission's expert group register, including those of the Expert Group/Multi-Stakeholder Platform on Protecting and Restoring the World's Forests, including the EU Timber Regulation and the FLEGT Regulation.</p> <p><b>(n)</b> Substantiated concerns raised by third parties, or of which the organisation is aware, including those submitted under Article 31 of the EUDR.</p> <p><b>(o)</b> Where applicable, information on the history of non-compliance of operators or traders along the relevant supply chain in relation to the relevant Sustainability Framework requirements and the EUDR.</p> <p><b>(p)</b> Any other information that would point to a risk that the relevant products are non-conforming with the relevant Sustainability Framework indicators or risks of mixing.</p> <p><b>(q)</b> Complementary information on compliance with the relevant Sustainability Framework indicators and the EUDR, which may include information supplied by certification or other third-party certified schemes. This includes voluntary schemes recognised by the Commission under Article 30(5) of Directive (EU) 2018/2001 of the European Parliament and of the Council.</p> <p>Note: The risk assessment requirement is only applicable to SME operators where they do not rely on an existing DDS Statement already submitted.</p>						
<b>EUDR 3.3</b>	The operator shall assess the potential for circumvention or mixing of low-risk materials with materials from unknown or higher-risk	Art. 10(2) Art. 13(1)	✓		✓	✓	

#	Requirements	EUDR Ref.	Non-SME Op.	SME Op.	Simplified DDS	Non-SME Trader	SME Trader
	origins, and document the basis for concluding negligible risk.						
<b>EUDR 3.4</b>	Risk assessments shall be documented and reviewed at least annually, or whenever there are significant changes in the supply chain or context.	Art. 10 (1)-(4)	✓			✓	
<b>EUDR 4</b>	<b>Risk mitigation</b>		✓	✓	✓	✓	
<b>EUDR 4.1</b>	For all products or materials within the scope of the due diligence system, risks shall be concluded as low or mitigated before the products are placed on the EU market or exported from it.	Art. 3 Art. 4 (2) Art. 10 (1) Art. 11 (1)	✓		✓	✓	
<b>EUDR 4.2</b>	Decisions on risk mitigation procedures and measures shall be documented, reviewed at least annually, and made available by operators to the competent authorities upon request.	Art. 11(3)	✓			✓	
<b>EUDR 5</b>	<b>Ensuring a robust Due Diligence System</b>		✓	✓	✓	✓	✓
<b>EUDR 5.1</b>	The organisation shall submit a due diligence statement through the EU information system before placing a product on the EU market or exporting it from the EU.	Art. 4(2)	✓		✓	✓	
<b>EUDR 5.2</b>	All information necessary to demonstrate that due diligence was exercised and that no, or only a negligible, risk was found is communicated to downstream supply-chain entities, including the reference number of the DD statement.	Art. 4(7)	✓	✓	✓	✓	
<b>EUDR 5.3</b>	If the SME places on the market or exports products that have already been subject to due diligence by another operator, the organisation may rely on the existing due diligence statement, provided that: <b>(a)</b> The reference number of the due diligence statement is obtained and recorded; and <b>(b)</b> It can be demonstrated that the scope of the original statement fully covers the relevant product or component.	Art. 4(8)		✓			



#	Requirements	EUDR Ref.	Non- SME Op.	SME Op.	Simpli- fied DDS	Non- SME Trader	SME Trader
<b>EUDR 5.4</b>	An organisation may refer to due diligence statements that have already been submitted to the information system only after having ascertained that due diligence was exercised for the relevant products contained in, or made from, the relevant products.	Art. 4(9)	✓			✓	
<b>EUDR 5.5</b>	The organisation shall make all relevant information available to competent authorities upon request and collaborate with them as needed.	Art. 4(6) Art. 12(5) Art. 9(2) Art. 13(1)	✓	✓	✓	✓	✓
<b>EUDR 5.6</b>	The organisation shall publicly report at least annually — as widely as possible, including via the Internet — on its Due Diligence System. The report shall include the steps taken by the organisation to conform with the requirements of this Standard. It shall include the following information:  <b>(a)</b> A summary of the Due Diligence System. <b>(b)</b> The conclusions of the risk assessments carried out as per section 4 of this Standard, including a description of the information and evidence obtained and used to assess the risk, and the risk mitigation measures undertaken. <b>(c)</b> Where applicable, a description of the process of consultation with indigenous peoples, local communities, other customary tenure rights holders, or civil society organisations present in the area of production of the relevant commodities and products.	Art. 12 (3)	✓			✓	
<b>EUDR 5.7</b>	If the organisation identifies, including substantiated concerns, that a product which has been sold or supplied does not conform to a low-risk conclusion, the following steps shall be taken:  <b>(a)</b> The further supply of products found to be non-conforming with such claims shall	Art. 4(5)	✓	✓	✓	✓	✓

#	Requirements	EUDR Ref.	Non- SME Op.	SME Op.	Simpli- fied DDS	Non- SME Trader	SME Trader
	<p>cease until effective mitigation of any risks has been completed.</p> <p><b>(b)</b> Relevant companies to which the product has been supplied shall be informed in writing, as appropriate and in a timely manner.</p> <p><b>(c)</b> The competent authorities of the Member States in which the relevant product was placed on the market shall be informed immediately.</p> <p><b>(d)</b> For exports from the EU, the competent authority of the Member State which is the country of production shall be informed.</p> <p><b>(e)</b> Permissions granted under the EUDR Simplified Due Diligence requirements shall be ceased, ensuring that risk assessments are carried out and risk mitigation measures implemented.</p> <p><b>(f)</b> A record shall be made of the actions taken.</p>						

Preferred by Nature is an international non-profit organisation working to support better land management and business practices that benefit people, nature and the climate. We do this through a unique combination of sustainability certification services, projects supporting awareness raising, and capacity building.

For 30 years, we have worked to develop practical solutions to drive positive impacts in production landscapes and supply chains in 100+ countries. We focus on land use, primarily through forest, agriculture and climate impact commodities, and related sectors such as tourism and conservation.

[www.preferredbynature.org](http://www.preferredbynature.org)

