



EUDR in Operation – A Pathway to Audits in Germany

European EUDR Summit: EUDR in Practice - September 3rd 2025



Agenda





Implementation of EUDR in Germany by the BLE - Audits

- Digital control process Overview and focus on particular steps
- Summary: What is being controlled by the BLE?
- Use of geo data and map material
- Current challenges Dry Runs and testing of the service portal
- BLE's information offering

Background: EUDR digital control process Overview – steps of the procedure

Objective: Extensive automation in the initiation of checks and formal verification of incoming documents, automated creation of check notes and notifications as well as comparison of (geo)data sources, EU-IS data, etc.

Development of interface Service portal for Implementation Automatic data Preparation, submitting EU information synchronisation Creation of of checks, digital processing and documents system (EU-IS), annual plans transmission of transaction (e.g. geolocation regarding a data processing, data) processing reports control transfer to federal states

Development of EU information system interface, data processing, transfer of data to federal states

- Minimum requirements of the information system: Art. 33 para. 2 EUDR
- Specific/Tangible interface descriptions from the EU-Commission for the competent authorities of the member states were published in spring of 2024; the interface-test for operators is available since May 27th, 2024

Creation of the annual control plan

Starting point: checks on operators and relevant products in accordance with a risk-based approach (BLE)

Rates for checks / "Benchmarking" / 1%, 3%, 9%

Risk category of country/part thereof depending on the classification by EU-COM

Minimum checks for each relevant commodity individually based on the total number of operators in the previous year, and, if applicable, the quantity

Creation of the annual control plan

Checks in accordance with EUDR - three different scenarios:

Checks based on national risk criteria, Art. 16 EUDR Checks in accordance with Art. 16 para. 12 EUDR in the case of relevant information, including "substantiated concerns" from third parties in accordance with Art. 31 EUDR

Checks in situations requiring immediate action, Art. 17 EUDR -Uniform risk profiles in the EU IS

Deadline: 3 working days or 72 h (perishable products)

Creation of the annual control plan

Data management

- Data retrieval from EU-information system (expected daily approx. 50,000 data sets relevant for Germany; individual data set for DDS max. 25 MB)
- Import of other data sources
- Apply risk criteria to the data
- Transfer of data to the national authorities via an interface
- Monitor compliance with minimum check rates (1%, 3%, 9%)

Carrying out of checks (increasing the degree of automation in stages)

Service portal (under construction) - A web-accessible portal to:

- 1) Enter data and information
- Examination of the due diligence system
 - risk assessment and risk mitigation procedures
 - documentation and records that demonstrate proper functioning of the due diligence system
- 2) Upload evidence in defined common data formats
- Examination of documentation and records to ensure that specific relevant products comply with the regulation and examination of the associated due diligence statements
- 3) Communicate with operators, including communication in case of substantiated third party concerns
- If necessary:
 - on-the-ground examination of the relevant commodities/products
 - examination of corrective measures
 - material sampling, spot checks (including field audits)

Carrying out of checks (increasing the degree of automation in stages)

Service portal - Screens > (= "Questionary" to submit the relevant information on demand)

Examination order including login data:





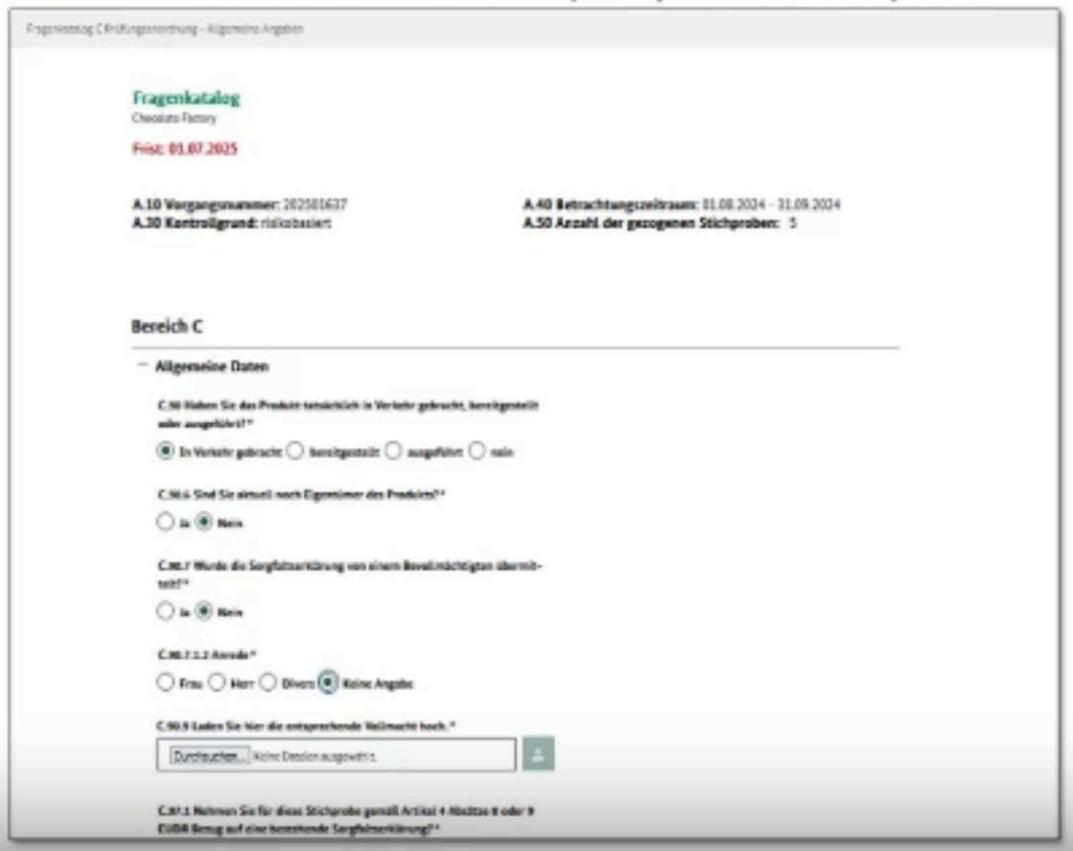
Submitting information about operator/trader and DDS

Bunderstehrl und Imilitary Landerstehrl und Imilitary	Serviceportal EUDR Kontrolle
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Carrying out of checks (increasing the degree of automation in stages)

Service portal - Screens

Information about selected sample by the control plan

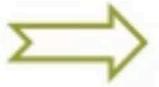


> Submission to BLE



Summary: What is being controlled by the BLE?

- Due diligence system
- Information on the product and production country
- Information of geolocation
- Upstream and downstream stakeholders
- Legal requirements of the production country
- Risk assessment
- Risk mitigation



The simplifications for SME operators and SME traders as well as for low-risk value chains apply

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Geolocation checks within the EUDR digital control process

From the start of EUDR-controlling:

- Creation of the annual control plan: Geolocation based risk rules
 - Risk criteria (EUDR Art. 16) e.g. "distance to forest edge", "distance to indigenous area"
- Digital control process: Analysis of Traces Polygons of DDS

Research project for future controlling of geo data (timeframe: August 2024 until July 2027):

- "Risk-Based Monitoring Service (RiMoDi)" in collaboration with the Thünen-Institute
- Objective: Development of a risk-based Geographic Information System (GIS) analysis tool. Based on satellite data, spatial information on land cover and land use, as well as their temporal changes (e.g., detection of deforestation or forest degradation), is calculated. In the BLE review process, the results are evaluated using a GIS analysis tool, along with the geolocation information of the companies.

Stepwise/Iterative-Analysis:

- 1.1 Automatised Intersection of EO-Datasets
- 1.2 Desktop-based Analysis of EO-Datasets
- 2. Cloudbased Satellite Imagery Processing and Analysis
- 3. VHR-Imagery visual interpretation

All DDS

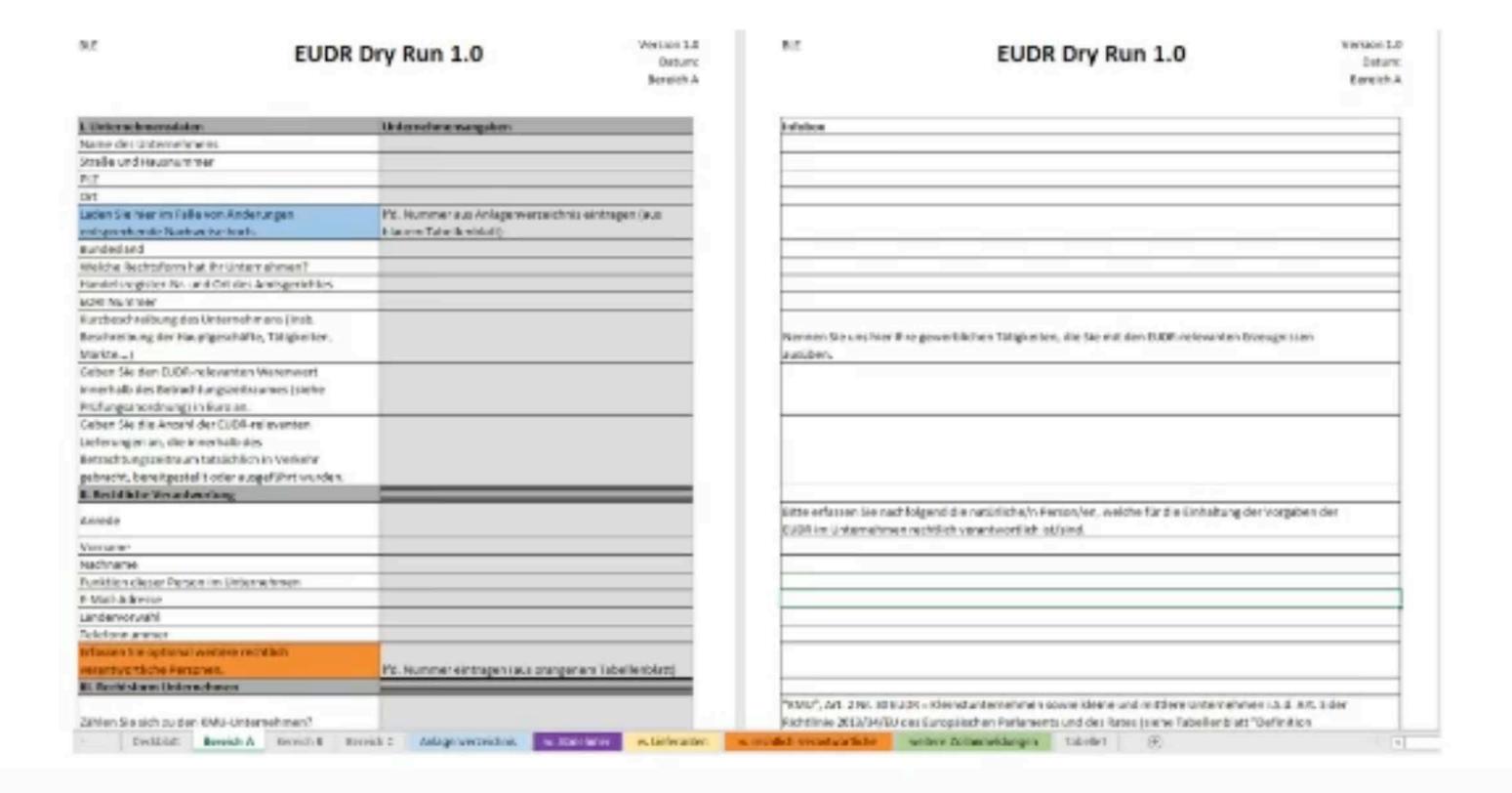
Selected DDS

Individual

Individual

Dry Runs in third countries

Carrying out dry-runs in different countries- a mutual learning process



Qualitive (technical) tests of the service portal

- Service portal currently scheduled to go live/launched in early 2026
- Qualitative testing of the service portal by voluntarily participating companies in September
- Requirements: Registration in Traces and completion of EUDR preparations by participating companies
- Selection is based on the test paths to be tested
- Objective: To identify errors and opportunities for improvement in the service portal
- Feedback will be incorporated into the development of the service portal.

Where can you find further information?



The BLE and the corresponding Federal Information Centre Agriculture (BZL) provide information on the implementation of the EUDR

1.	Website: www.ble.de/entwaldungsfrei	 Who has to take action? Overview of EUDR requirements for market participants: Visual aids for implementation Information on the EU Information System: with links to newly published videos by the EU Commission, German-language video to be published at a later date
2.	EUDR-newsletter	 Content: News from the EU Commission and the BMLEH, information to improve comprehension of the Regulation, notification of new content on the BLE website Frequency: irregular, first issue at the beginning of October 2024, a total of 8 issues in 2024 / between 2 and 3 editions per month Subscription at www.ble.de/entwaldungsfrei-newsletter
3.	EUDR webinars 2025	 Series of web seminars on EUDR with different thematic focuses (e.g. SMEs, customs issues, etc.) 8 dates planned, started in February - registration at www.ble.de/entwaldungsfrei-web-seminare
4.	Information for German primary production (soy, timber, cattle)	New article for domestic producers preparing for the EUDR: <u>www.praxis-agrar.de/eudr</u> (a website offered by the BZL)
5.	BLE-Helpdesk	The help desk answers questions about the EUDR at anfragen@entwaldungsfreie-produkte.de

Thank you for your attention!

Further information: www.ble.de/entwaldungsfrei

Contact

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Website: www.ble.de/entwaldungsfrei

Helpdesk: anfragen@entwaldungsfreie-produkte.de

The information given in this presentation reflects the current (technical) state of affairs and does not justify any legal claims in individual cases, particularly in the context of performed audits in the future.

