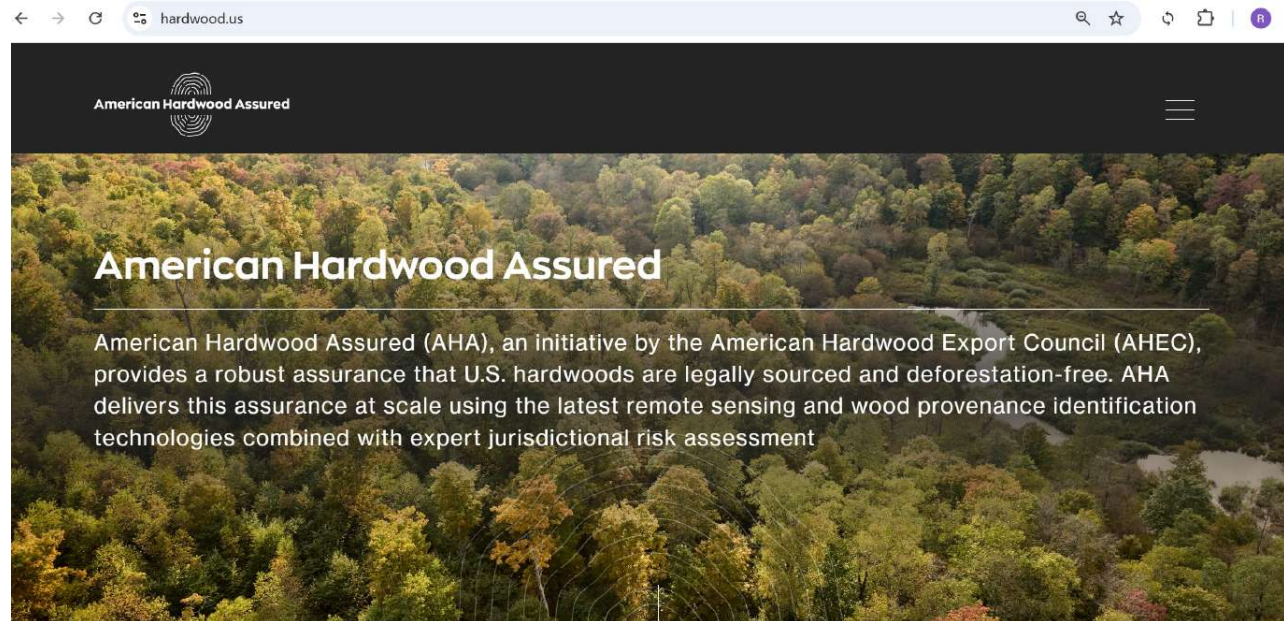


EUDR: From Regulation to Opportunity

Building a Competitive Edge Through Compliance in the Global Timber Markets

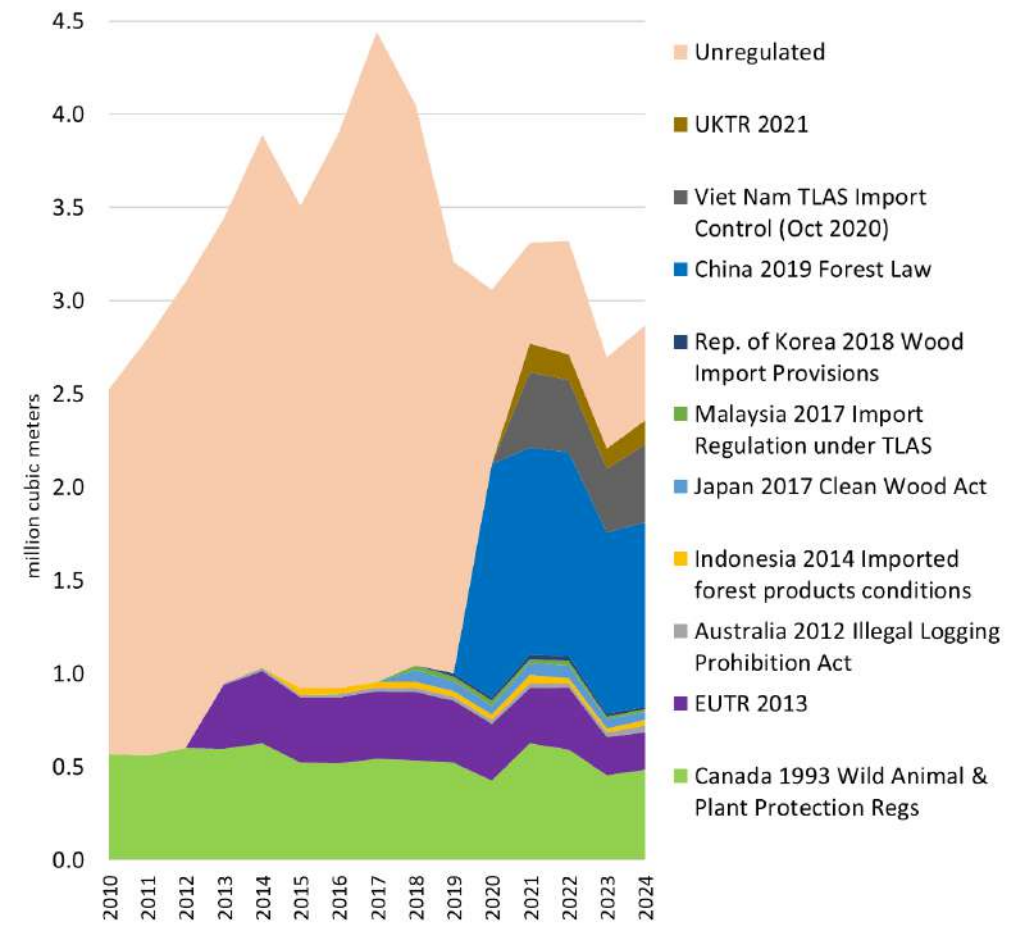
rupert@americanhardwood.org



Policy context: FLEG(T) demand side measures

- Regulations to prohibit placing of illegal wood on consumer markets
- Canada WAPP (1993), US Lacey Act (2008), Australia ILPA (2012), EUTR, Japan Clean Wood Act (2017)
- Most laws require due diligence to minimise risk of illegal origin
- Tracking to forest origin to the extent necessary to demonstrate negligible risk
- EUDR is an outlier:
 - 100% tracking rather than risk based due diligence
 - Deforestation-free rather than legal
 - Outsized influence
 - EU imports from 3rd countries
 - Responsible traders want to comply with “highest” standards

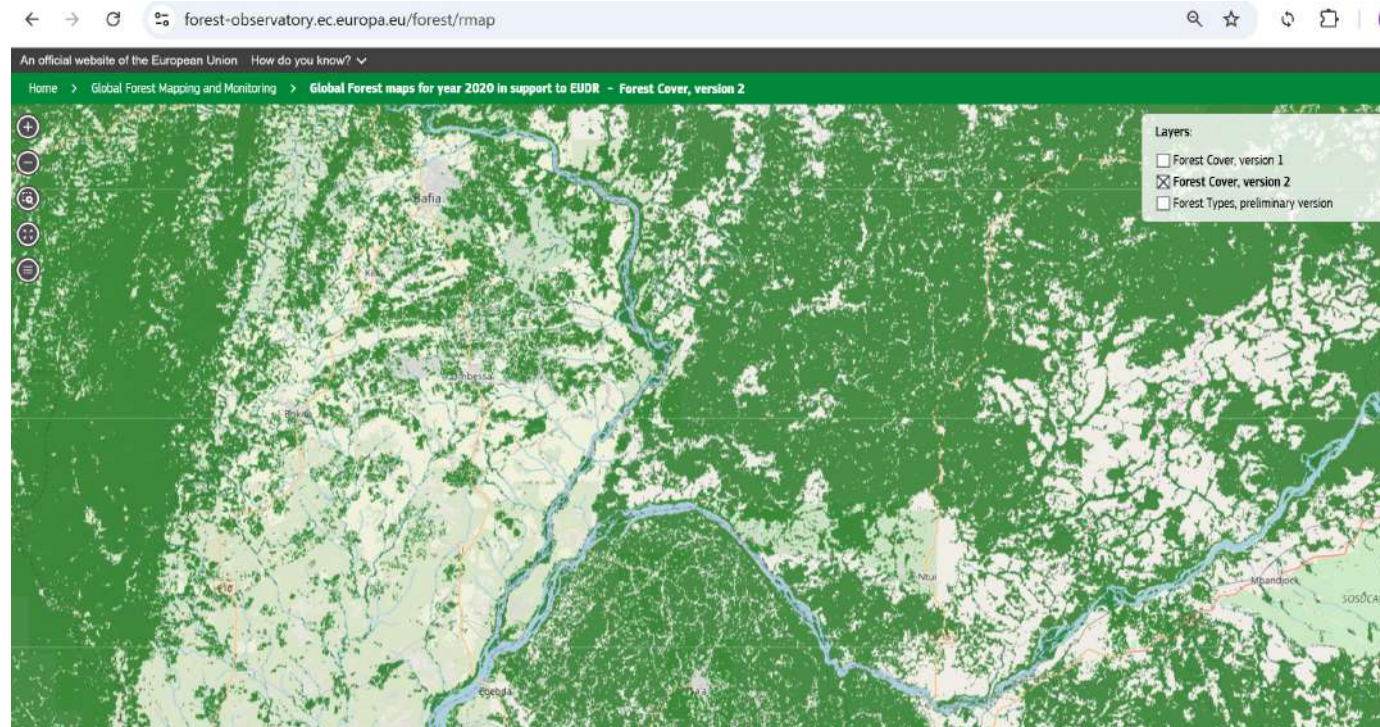
U.S. hardwood lumber exports to countries according to status of due diligence regulations 2010 to 2024



Scope of EUTR vs EUDR

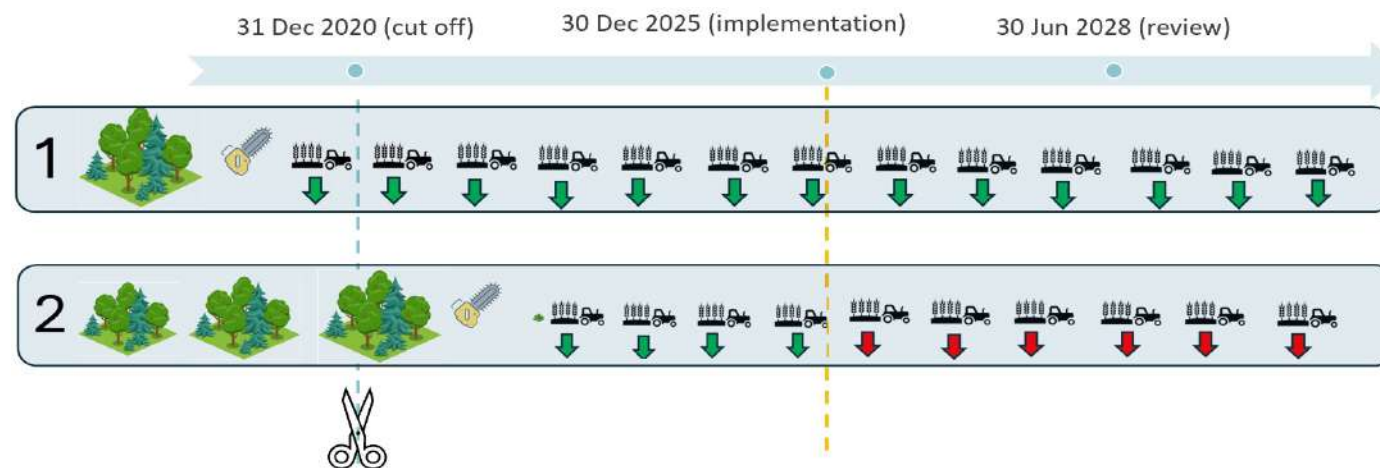
	EUTR	EUDR
Policy context	FLEGT: tackle illegal logging, promote good forest governance	EU Green Deal: reduce embodied carbon in imports, de-risk supply chains
Products	Timber	Timber, cattle, cocoa, coffee, oil palm, rubber, soya
Prohibitions	Illegally harvested	Illegally harvested, contrary to laws covering labour, human & indigenous rights, deforested, degraded
Operator obligations	Due diligence system (DDS) maintained	DDS maintained & DD statement submitted with each consignment before it is placed on, made available on (by non-SMEs), or exported from, the EU market
Traceability	To country of harvest and, beyond that, to the extent necessary to demonstrate negligible risk	Geolocation of "plot of land(s) within a single real estate property" where harvesting took place with each consignment irrespective of risk

The BIG IDEA behind EUDR



- Regulated products from “plots of land” that have been deforested or degraded after the 31 Dec 2020 cut-off date cannot be placed on or exported from EU market after 30 Dec 2025

- EU operators & regulators can verify by checking satellite imagery at plot geolocations against the 2020 base map produced by the EC Joint Research Council



FSC certified harvest location in Wisconsin

*Google Maps Images
(around 1m resolution i.e.
much higher resolution than
regularly updated publicly
accessible imagery)*

3 August 2011



26 April 2015



6 June 2017



20 March 2020



31 May 2023



***Nearly 10 years later, still not clear if this is a regenerating forest
or crop or pasture, even using very high-resolution imagery***



EUDR strengths and challenges

Strengths

- Commendable objective: to reduce commodity driven deforestation
- Includes agricultural commodities (> 90% of all deforestation)
- Maintains and extends prohibition against illegal trade
- Innovative and forward-looking – encourages new assurance mechanisms

Technical challenges

- Over-estimates access to technology & data in short to medium term, particularly by SMEs
- Under-estimates supply chain complexity, particularly for commodities from smallholders & composite products
- Over-specified and poorly geared
- Poorly adapted to forest products
- No international “degradation” definition
- Failure to understand time factor – conversion only becomes apparent several years after wood harvest

Political challenges

- Resistance from domestic producers (EUDR seen as disproportionate)
- Resistance from right wing EU politicians (excessive costs for businesses & farmers, privacy concerns)
- Rising calls for “negligible risk” country category & removal of all DD obligations inside the EU
- Resistance from trade partners (discriminatory, inflexible, WTO trade barrier)

EC proposal to amend EUDR, 21 October

Not yet approved by Council & Parliament – 1st EP debate expected 12-13 November

Date of general application unchanged (30 Dec 2025) but other adjustments to timeline:

- Application delayed until 30 Dec 2026 for “Micro and small” operators
 - Turnover <€10m & <50 employees (i.e. no delay for most EU wood importers)
- No checks or sanctions until 30 June 2026

Simplifications (EC claim to reduce load on IT system, ENGO claim due to interference by US & other non-EU countries, but real reason is INTERNAL EU POLITICS)

- Removes **nearly all requirements for DD in EU internal market, nothing of any value to non-EU producers**
- **“Micro and small primary operators” in “low risk countries”**:
 - No need for due diligence statement (DDS) with every harvest, only a “one-time simplified declaration” (SD)
 - Only applicable to primary operators that harvest & place products directly on EU market with no intermediaries (i.e. essentially only EU forest owners and farmers)
- **New category of “downstream operator”**:
 - All EU operators except importers & first placers of primary products
 - Only obliged to pass on DDS/SD numbers, no due diligence, only non-SMEs enter data on IT system
 - EU domestic industry still unhappy: want no obligation to transfer any reference numbers



Timeframe for forest products under EUTR & EUDR (October 2025 proposal)



Harvested before
29 June 2023



Medium & large
enterprises

EUTR

EUDR

Harvested
after 29
June 2023

Micro & small
enterprises

EUTR

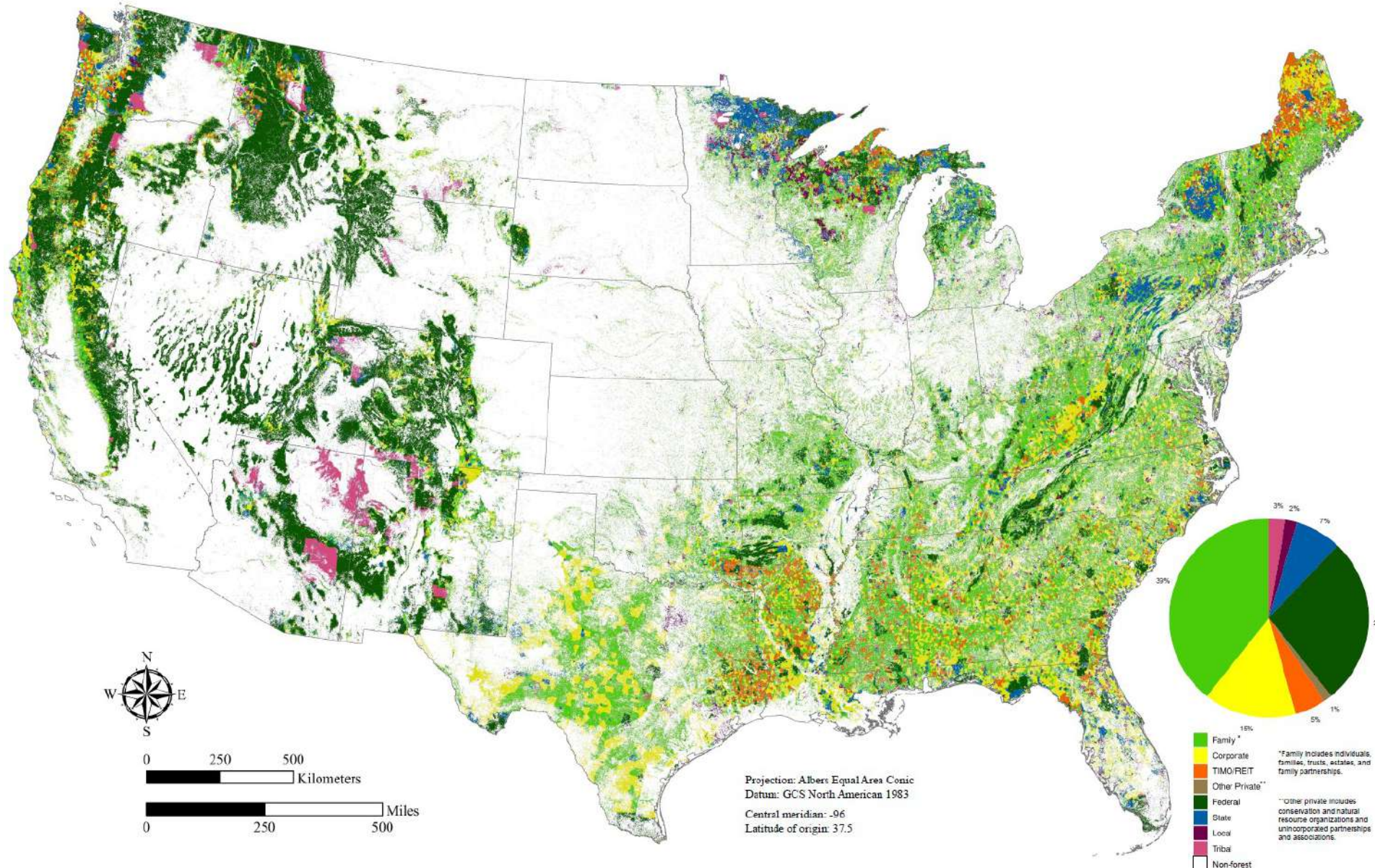
EUDR



Source: AHEC, DRAWING ON TIMBER DEVELOPMENT UK (TDUK)



U.S. forest context: ownership

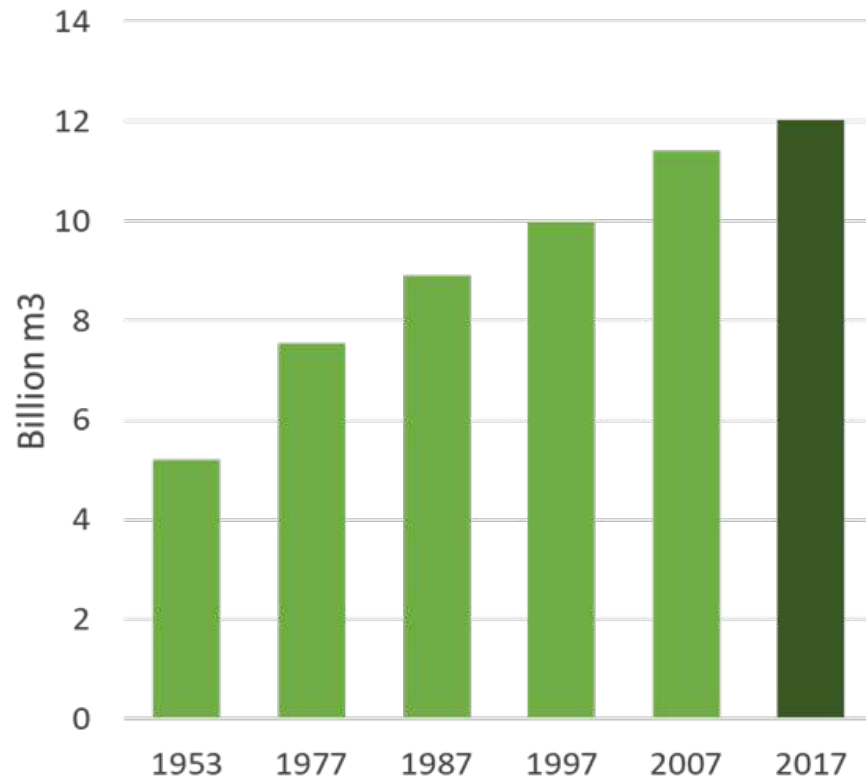


Source: *Estimated Distribution of Forest Ownerships Across the Conterminous United States, 2017* Emma M. Sass, Brett J. Butler, and Marla Markowski-Lindsay. USDA Publication, 2020



US forest context: hardwood forest growth and age-class

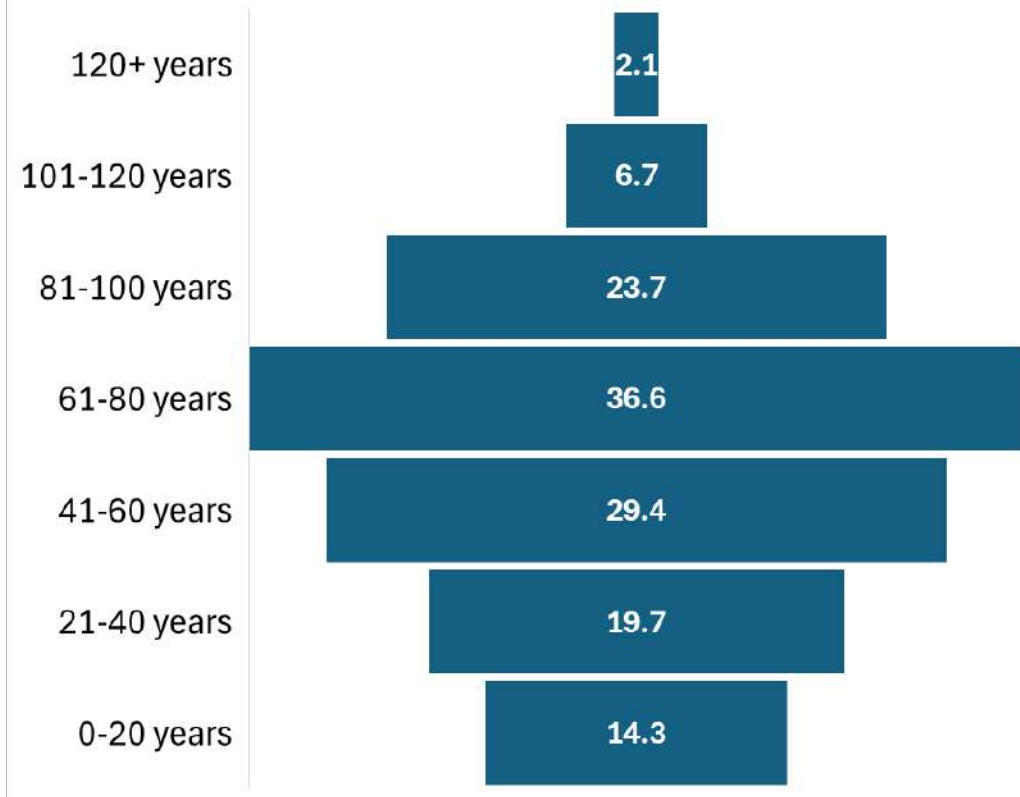
US hardwood standing volume 1953-2017



Source: US Forest Service, 2020 RPA



Area of US hardwood and mixed hardwood/softwood forest types by age class in million hectares (source USDA FIA)

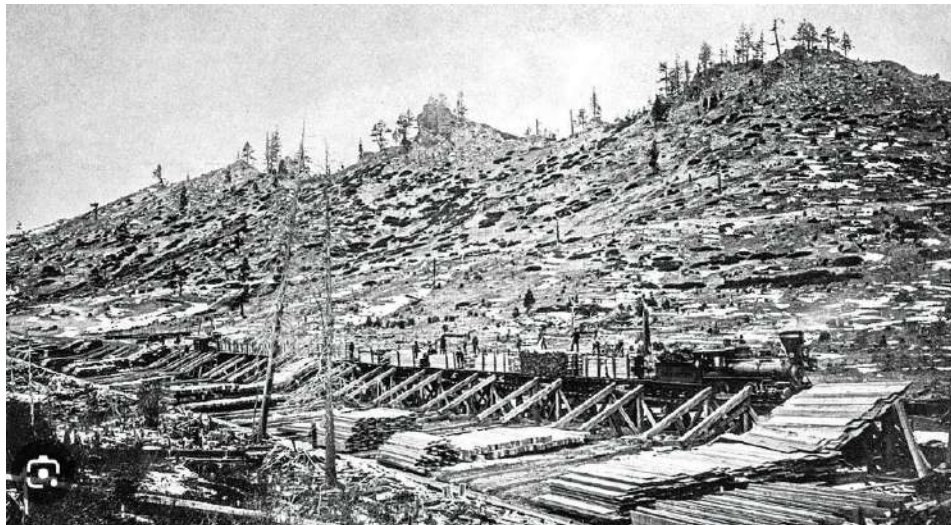


Source: US Forest Service, FIA, latest inventory, 2020-23 depending on state



Negligible risk of deforestation in US hardwood forest

Source	Period	Forest type	Annual average conversion to agriculture	
			hectares	% total area
EU Observatory on Deforestation & Forest Degradation, EC Joint Research Centre (JRC)	2020-2022	All	16,530	0.0045
BWA Preliminary Assessment of USDA Cropland Data Layer - commissioned by AHEC	2020-2023	Hardwood & mixed hardwood/softwood	3,300	0.0029

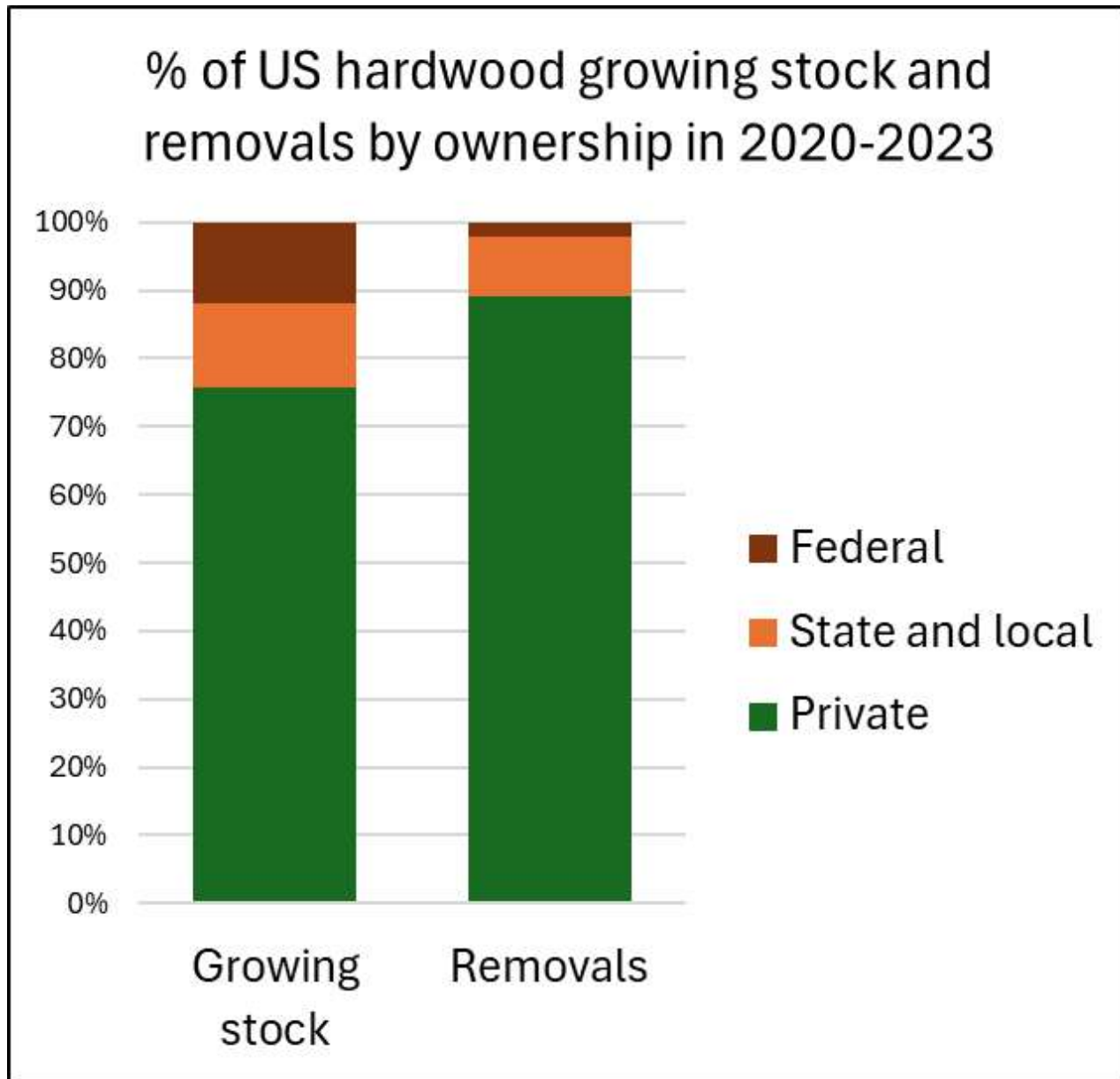


Pennsylvania: Allegheny area – late 1800s



2024

US hardwood supply



U.S. hardwood supply chain

Typical U.S. hardwood lumber mill (~2000 in the U.S.)

- Each mill sources logs from ~100-mile radius
- Circle enclosing 8m has. area & several 100k forest properties
- 200-300 harvest sites per year distributed across those properties
- Mainly low intensity selection harvest
- Log procurement:
 - 45% logs bought standing
 - 5% company lands
 - 45% hauled to sawmill by landowners/loggers
 - 5% from other mills/log brokers
- Logs sorted by species, size, grade
- Further sorts after sawing & drying

X

Typical U.S. mid-sized hardwood exporter

- Purchases from ~80-100 mills
- Several million forest properties
- Distributed across several states
- Further mixing & sorting to match customer specs

=

**16k to 30k
potential
harvest sites
for each
consignment**



American Hardwood Assured



Legal & deforestation-free proof of provenance

- Globally applicable assurance mechanism
- Inspired by EUDR
- Geographic ID not certification
- Strong focus on forest governance
- Easy & accessible online portal for suppliers
- Uses latest technology to increase accuracy and reduce costs
- Targeted independent expert risk assessment
- Blockchain tracking & plant-chemistry-based surveillance by 2026
- Initially operated by AHEC and free to all US-based hardwood traders
- Eventually independent, funded by pay-as-you-go volume-based licensing



American Hardwood Assured (AHA)

www.hardwood.us

Deforestation Risk Assessment
(county level)

U.S. Hardwood Legality Risk
Assessments (state level)

Phase 1 Web Portal for U.S.
hardwood exporters
Generates standardised due
diligence statements

Phase 2 Web Portal for global
supply chain &
Plant-chemistry-based wood
provenance testing
By September 2026

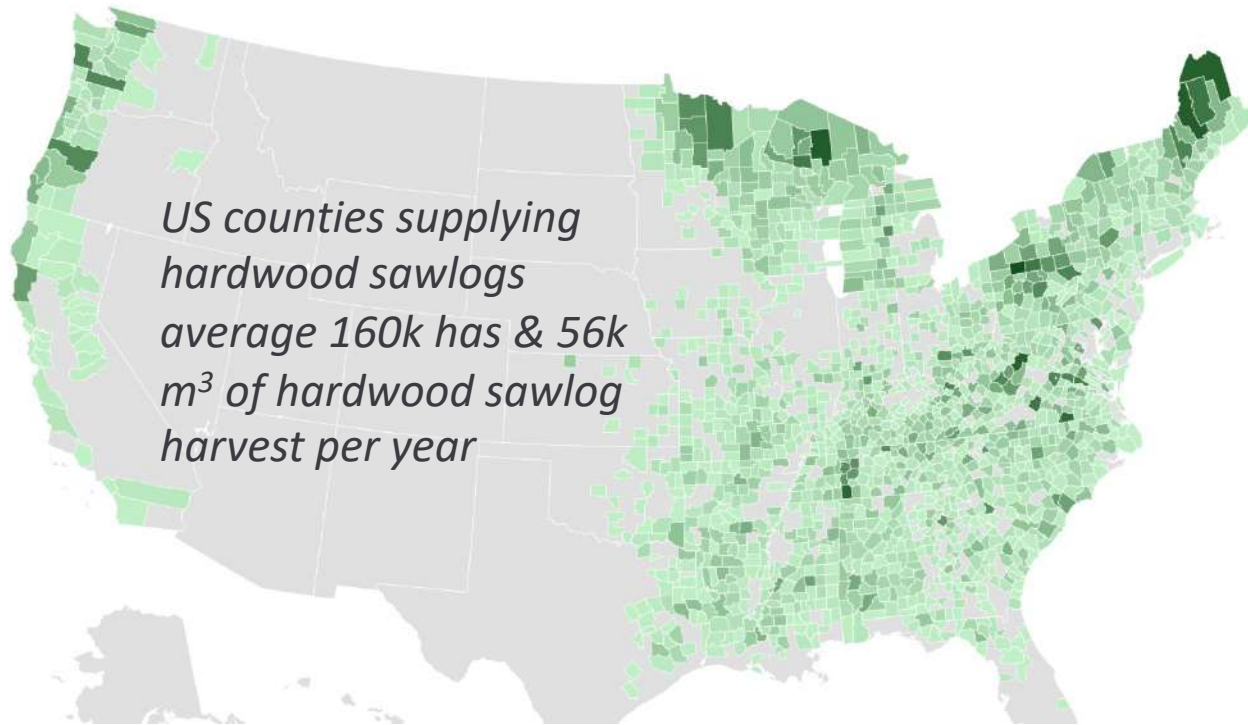


“Smart geolocation”: U.S. counties of origin

All US counties producing hardwood sawlogs

Based on latest State Annual Inventory (years 2020 to 2023 depending on state)

Hardwood Sawlog Removals (1000m³)
0.26 461.44



1600 counties account for 100% of US hardwood sawlog supply – more manageable than identifying forest owners

Only way to comply with limits placed on “in-excess” reporting in EU guidance and in the EUDR Information System

Equity in relation to state forest areas, tropical concessions, & industrial plantations

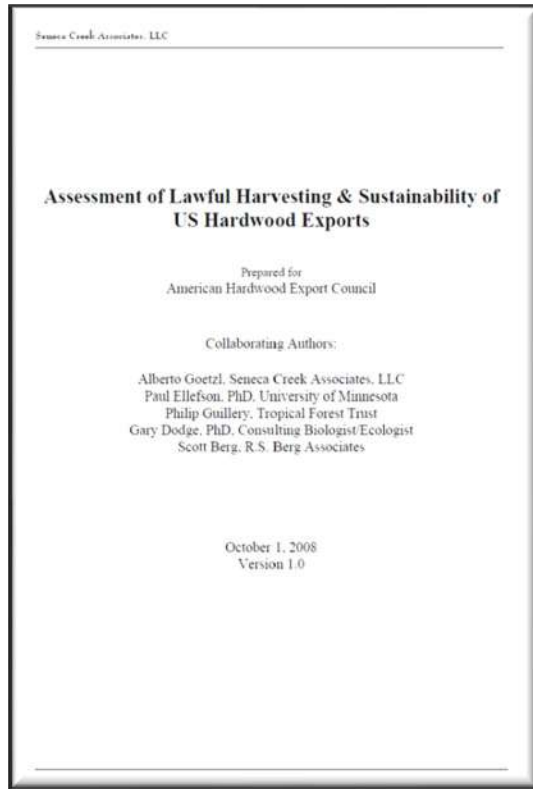
Counties are sufficiently compact to ensure a homogenous level of deforestation risk

Provenance verifiable using plant-chemistry-based provenance technologies (TEA, SIRA, LIBS)

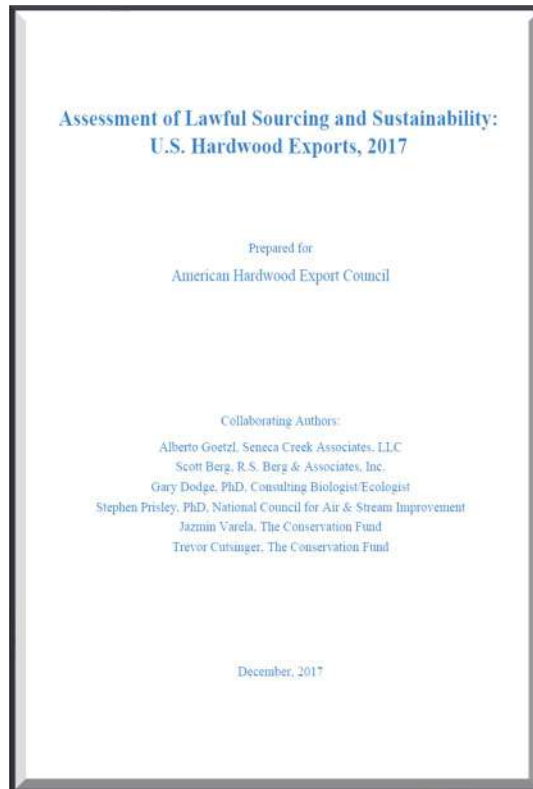
Resolves confidentiality and anti-trust issues surrounding provision of data on individual properties



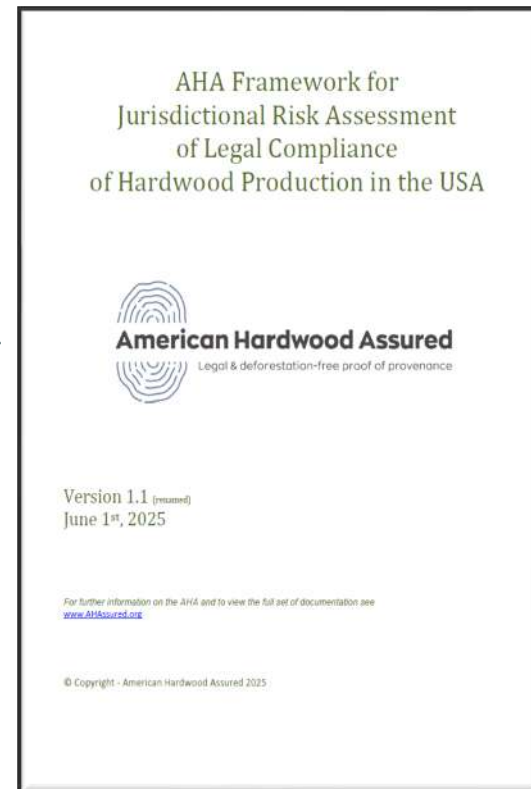
AHA Legality Jurisdictional Risk Assessment



2008 "Seneca Creek Report"



2017 "Seneca Creek Report"



2024 AHA JRA Framework



2024-2025 AHA State Risk Assessments by Dovetail
All 37 hardwood states
www.hardwood.us/aha-jra-results



AHA Legality Risk Assessment Summary for Virginia Feb 2024

Confirmed Negligible Risk across all 18 indicators



Summary of Risk Assessment against AHA Framework for Jurisdictional Risk Assessment of Legal Compliance of Hardwood Production in the USA



— State of Virginia

Detailed findings and conclusions for each indicator can be found in the assessment.

Table: JRA Summary

Indicator	Negligible Risk	Summary of findings
3.1 Timber theft, trespass laws and regulations are enforced	<input checked="" type="checkbox"/>	Incidents of timber theft/trespass are monitored and assessed. The laws relating to timber theft in Virginia are noted to be diverse and complex. Virginia adopted specific laws addressing timber theft in 2019 in response to criticism that the laws could be more effective for landowners. The new laws address intentional theft as a criminal act with possibility of jail and monetary penalties. As an additional safeguard, the laws include a requirement for load tickets for each load of timber removed.
3.2 Timber ownership rights are well established and upheld	<input checked="" type="checkbox"/>	The Virginia Department of Forestry is the state agency in charge of investigation of suspected cases of timber theft and trespass disputes. They have legal authority to access and assess all commercial logging activities on state and private lands. Isolated and independent cases of timber theft have been published since 2016, including convictions of perpetrators. There is no evidence that legal structures exist, and law enforcement agencies act on reported cases of timber theft. There are isolated instances where offenders are prosecuted as illustrations of a functional regulatory system.
3.3 Timber ownership rights are well established and upheld	<input checked="" type="checkbox"/>	Timber ownership rights, including the right to harvest and sell, are well established and legal processes and timber ownership rights are functioning in the State of Virginia. There are examples and individual cases of land disputes in Virginia that are addressed by the court system, including deed conflicts, deed overlaps, and zoning issues. These disputes provide evidence of the isolated nature of title disputes and the availability of the court system to resolve such disputes.
3.4 Legal processes are well established for resolving contract disputes	<input checked="" type="checkbox"/>	Legal pathways for resolving contract disputes are established by Virginia and federal law.
3.5 The occurrence of corruption within the forest regulatory system	<input checked="" type="checkbox"/>	Federal, state, and local governing bodies are in place and functional in terms of regulatory enforcement. Virginia has been identified within state assessments to be in the worst third (ranked 14 of 50) in terms of being prone to corruption. Virginia is reported to have a relatively poor set of laws addressing corruption but a strong journalist reputation.

Indicator	Negligible Risk	Summary of findings
7.4 Forest chemicals are applied in compliance with applicable laws and regulations	<input checked="" type="checkbox"/>	There is no evidence to suggest that chemicals used in forest management are applied regularly or systematically in a manner inconsistent with state and federal laws.
8.1 Legal processes to address public complaints, disputes and grievances associated with forest management are in place and applicable laws are upheld	<input checked="" type="checkbox"/>	The United States has a well-established and comprehensive system of laws which are administered and enforced at all levels of government, primarily at the federal and state levels. While the primary avenue for formal settlement of legal disputes is through the court system, disputes can be addressed informally, outside the state and federal judicial systems via structured mediation processes that are recognized as equally binding under the law.
9.1 Applicable laws and regulations addressing workers' rights, health and safety are upheld	<input checked="" type="checkbox"/>	Workers' rights and worker health and safety are protected through a comprehensive suite of national and state laws and regulations. Government agencies at both the federal and state level have regulatory enforcement authority within the state.
9.2 Applicable laws and regulations addressing child and forced labor are enforced	<input checked="" type="checkbox"/>	Oppressive child labor and forced labor are illegal throughout the United States. State and federal laws and regulations are in place, with specific government agencies designated with authority to enforce the regulations. Government agencies at both the federal and state level have regulatory enforcement authority within the state.
9.3 There is no evidence that illegal government based upon race, creed, color, or sexual identity occur regularly or systematically for hardwood production	<input checked="" type="checkbox"/>	Numerous federal and state laws and regulations are in place to prevent discrimination in the workplace. Government agencies at both the federal and state level have the authority and the means to enforce these laws. Equal Employment Opportunity Commission records for individual charges of discrimination filed in Virginia from 2009 to 2022 show a declining trend, with a slight upward shift over the past year. These statistics apply across the state economy and are not specific to the forestry and forest products sectors, or to hardwood production.

Indicator	Negligible Risk	Summary of findings
	<input checked="" type="checkbox"/>	The Center for Public Integrity gave Virginia a poor grade in a 2013 state integrity investigation. Although the report highlights challenges Virginia has in its political culture, there is no evidence that the issue extends to forest management or the forest products industries.
2.1 Hardwood production and transformer comply with all applicable legal and regulatory requirements governing forest management, and the sale and export of lumber and wood products	<input checked="" type="checkbox"/>	Legislation exists at the national, state, and local levels regarding taxes and other fees associated with timber management and harvest. State laws require load or log tickets. All timber buyers are legally required to provide landowners with an accurate accounting of each load of wood removed from the property. The load tickets must include the name of the mill receiving and scaling the loads, the type of wood and product, and the volume/weight, among other data. State law does not require delivery tickets or other documentation to verify the legal ownership of incoming wood. There is no evidence that load ticket forgery or circumvention of the law is at all regular or systematic. Timber trespass and theft are noted to occur in the state, but the assessors could find no evidence that hardwood transformers were involved with illegal activities.
3.1 Illegal activities associated with structures that affect forest resources are prevented	<input checked="" type="checkbox"/>	Evidence and legal structures support that unauthorized and illegal logging, mining, and other site disturbing activities are irregular, not systematic, and constitute a very low impact on legality of harvest in the State. There are no reports of new surface mines in Virginia thus the likelihood of any forest products originating from mining activities is low. The likelihood of forest products originating from illegal mining activities is exceptionally low. There is some likelihood that forest products originate from cleanings associated with hydraulic fracturing ("fracking"). Fracking occurs in Virginia and is regulated through the Virginia Department of Energy. Fracking has been banned in the eastern part of Virginia. There are no known instances of illegal fracking in Virginia. arson is noted as one of many human causes of wildland fires in the State. There is no evidence that arson affects legality of hardwood logs harvested and sold.
3.2 Laws addressing protection of cultural and historical sites are upheld	<input checked="" type="checkbox"/>	Laws addressing protection of cultural and historical sites exist in the State. There is no evidence that forest management activities in the state regularly or systematically circumvent state and federal laws addressing cultural and historical sites.
4.1 Laws associated with applicable taxes, fees, and assessments as they relate to timber ownership and purchase transactions are upheld	<input checked="" type="checkbox"/>	Legislation exists at the national, state, and local levels regarding taxes and other fees associated with timber management and harvest. There is no evidence that timberland owners, loggers, or hardwood mills systematically avoid payment of taxes or other fees associated with hardwood production.
5.1 Hardwoods are consistently produced in accordance with	<input checked="" type="checkbox"/>	Laws addressing traditional use rights and civil rights are well established and robustly enforced.

Summary of independent scrutiny

Element	Comment
Title of risk assessment (if version number if relevant)	Jurisdictional Risk Assessment of Legal Compliance for Hardwood Production in the State of Virginia
Date of submission	February 7 2024
AHA Framework used	AHA Framework for Jurisdictional Risk Assessment of Legal Compliance of Hardwood Production in the USA (January 2024) V2.1
Name of organization producing risk assessment	Dovecall Inc.
Suitability of qualifications and experience of core risk assessors	Suitably Qualified.
Suitability of qualifications and experience of additional third parties involved in the assessment	A suitably qualified and diverse range of third parties consulted.
Consideration of conflicts of interests declared	No material conflicts of interest.
Completeness of consideration of criteria	All criteria addressed.
Completeness of consideration of indicators	All indicators addressed.
Alignment of the format of the risk assessment report to the AHA framework guidance	Fully aligned with the suggested format of the AHA Framework.
Consistency of risk ratings based upon evidence gathered	Consistent.
Recommendation made by	George White - independent consultant
Date of recommendation	February 9 th 2024
Recommendation to AHA Secretariat	Suitable for enforcement by AHA.

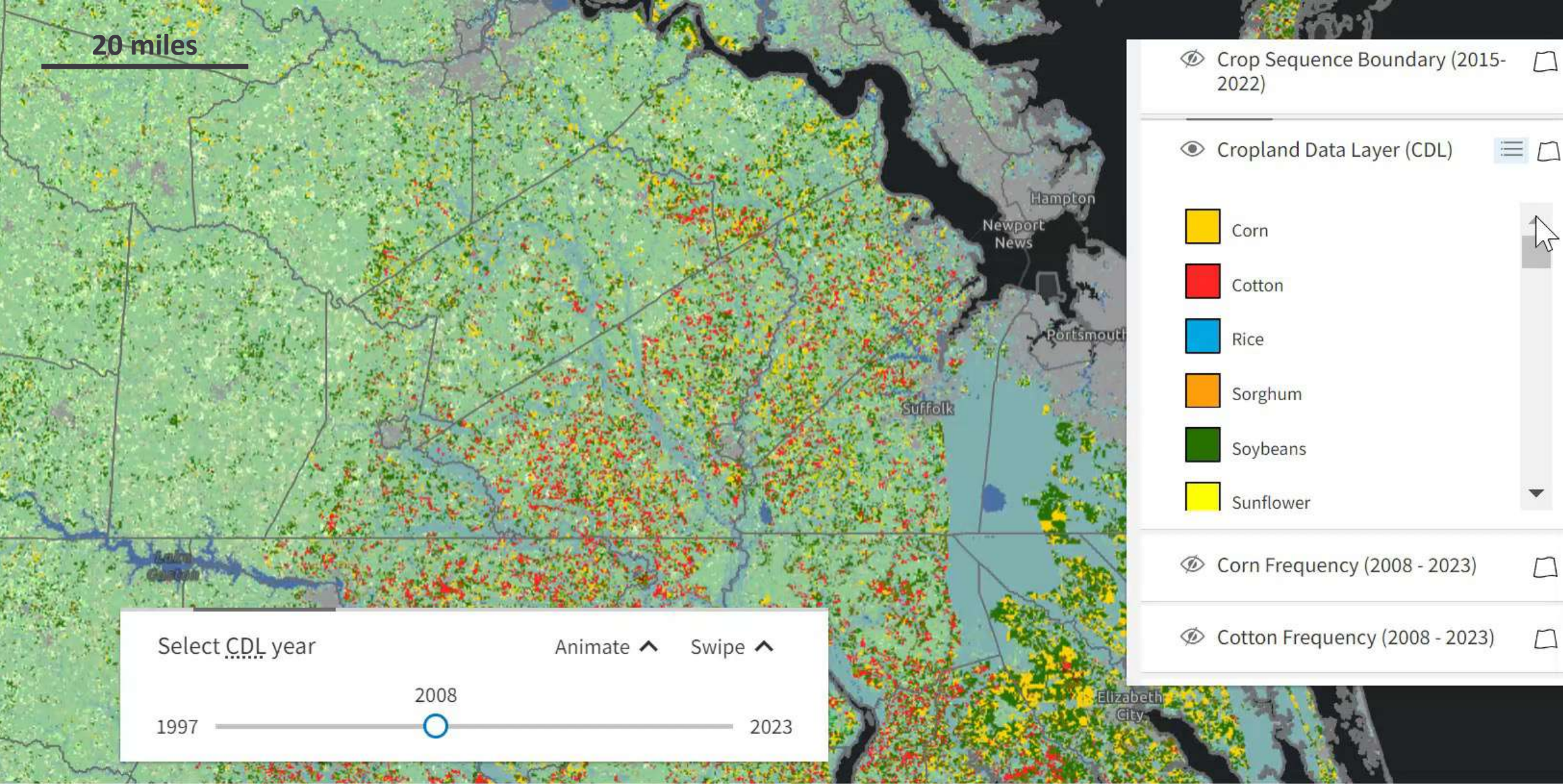
Summary of AHA Endorsement

The risk assessment was endorsed by AHA on February 20th, 2024.

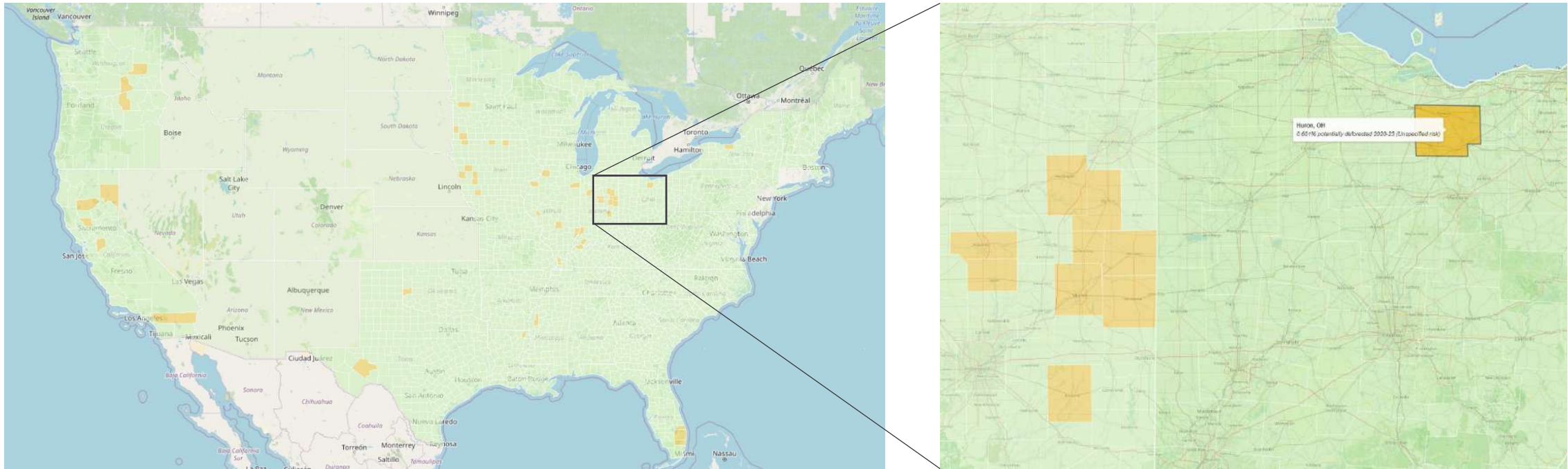
Indicator	Negligible Risk	Summary of findings
4.1 Applicable legally established traditional or civil rights	<input checked="" type="checkbox"/>	The assessors found no evidence to indicate a lack of consultation with Tribes, or the presence of meaningful controversy between Tribes in Virginia and state or federal governments regarding disputes over legal or customary rights. The US is recognized as a country with a well-established and comprehensive system of laws which are administered and enforced at all levels of government. Rankings indicate that the legal and regulatory compliance framework in the US is robust and effectively enforced.
6.1 Laws and regulations protecting hardwood forests and associated species are upheld	<input checked="" type="checkbox"/>	There are federal and state laws that ensure protection of threatened and endangered species. Additionally, there are public forest lands within the State that are managed for protection and conservation of hardwood forest ecosystems. There is no evidence that forest management activities are either illegal or contribute to illegal harm to state or federally protected, threatened or endangered species.
7.1 Laws and regulations addressing management of forest residual waste and debris to maintain long-term site productivity are upheld within the jurisdiction	<input checked="" type="checkbox"/>	There is no evidence that the laws associated with the distribution of logging slash and debris management are regularly or systematically circumvented and there is strong evidence that BMPs related to these laws have a high rate of conformance.
7.2 Laws and regulations addressing forest management impacts on surface and groundwater quality are upheld	<input checked="" type="checkbox"/>	Although the state's forestry BMPs are voluntary, they can serve as proxies for intentions to comply with federal laws. The State BMPs are thorough. BMP compliance overall in the state was reported to be 80% in 2015 and 93% in 2018. The Virginia Department of Forestry reports in 2022 that overall conformance to state BMPs is 95% ranging from 90% (sitting to 100% (chemical use and mechanical site prep). The Chesapeake Bay Preservation Act establishes that all forest operations within Tidewater Virginia must implement Forestry BMPs. BMP compliance in Eastern Virginia is reported to be 98% in 2022.
7.3 Laws and regulations addressing forest management impacts on air quality including smoke from prescribed burning and fugitive emissions, are upheld	<input checked="" type="checkbox"/>	State laws require that all commercial logging operations submit a notification to the Virginia Department of Forestry. This ensures the department has knowledge of the activities and access to the sites in order to verify legal compliance with water quality laws. There is no evidence that the notification requirement is regularly or systematically circumvented. There is no evidence that air pollution laws or fugitive emissions laws are regularly or systematically contravened in forest management and the state has taken multiple steps to avoid public health issues associated with smoke from prescribed burning/forest management.



USDA Cropland Data Layer: <https://croplandcros.scinet.usda.gov/>



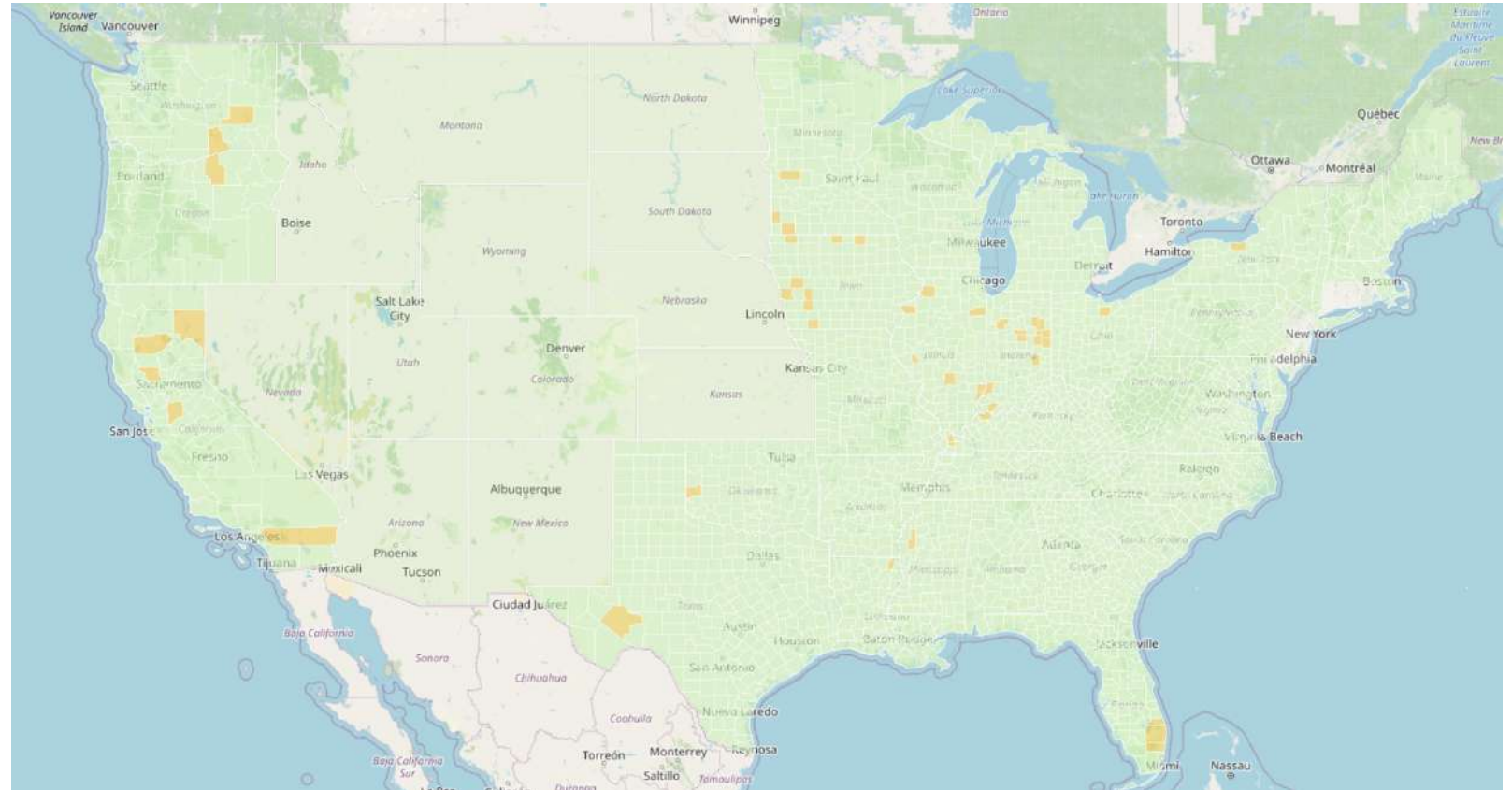
AHA Deforestation Analysis



- % hardwood forest area potentially converted to agriculture in each county 2020-2024. Counties classified as:
 - Negligible risk (green) – deforestation confirmed < 0.5% over the 4-year period (< 0.125%/annum).
 - Unspecified risk (amber) - deforestation possibly > 0.5%, subject to further assessment by AHA
 - Specified risk (red) – deforestation > 0.5% confirmed following further AHA assessment
- Where hardwood from “unspecified” or “specified” risk counties, users should declare mitigation action

AHA Deforestation Analysis

- For U.S. forests with a hardwood component between 2020-24:
 - 10,400 has/yr potentially converted to agriculture
 - 0.01% of total forest area (106m has) per year
- 2420 (98%) of 2471 counties confirmed negligible risk
- 99.35% of US hardwood sawlog production in counties confirmed negligible risk

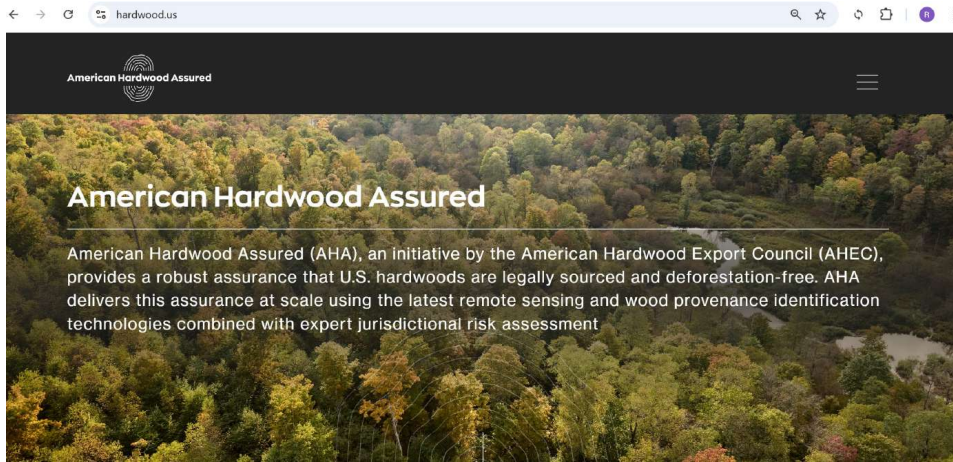


For every 10,000 m³ of U.S. hardwood sawlog harvested each year, only 1 m³ is on land potentially converted to agriculture

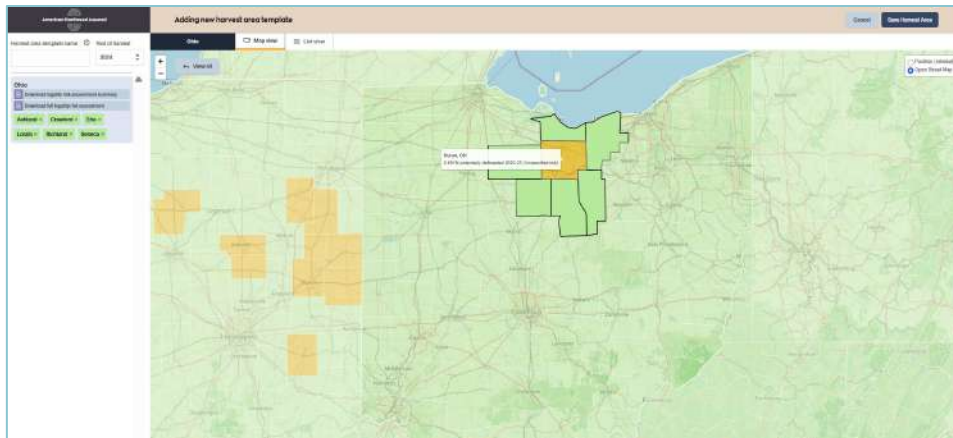


American Hardwood Assured (AHA)

www.hardwood.us



ID	Invoice number	Status	Date	Issuer
18.000110	0184841	Completed	03/01/2025	FISHER Lumber Associates SAREL, France
18.000114	Invoice 0204	Completed	06/26/2025	FISHER Lumber Associates SAREL, France
18.000117	Invoice number 346	Completed	06/19/2025	FISHER Lumber Associates SAREL, France
18.000111	Invoice 12345	Completed	06/19/2025	FISHER Lumber Associates SAREL, France
18.000116	Invoice number, contract number, bill of lading	Completed	06/25/2025	FISHER Lumber Associates SAREL, France
18.000104	Invoice 1234	Completed	06/19/2025	FISHER Lumber Associates SAREL, France
18.000103	Invoice number	Completed	06/04/2025	FISHER Lumber Associates SAREL, France
18.000102	Tree shipment inv 12	Completed	06/19/2025	FISHER Lumber Associates SAREL, France
18.000101	3476	Completed	06/19/2025	Horus Interim, Germany
18.000100	inv 224	Completed	03/25/2025	Forest Intelligence Intelligence Ltd United Kingdom
18.000099	184666576	Completed	06/25/2025	Horus Interim, Germany
18.000098	Invoice 28020	Completed	05/22/2025	Natix Hardwood Exports, United Kingdom
18.000097	inv 224	Completed	06/25/2025	Natix Hardwood Exports, United Kingdom
18.000096	1234	Completed	06/25/2025	FEIST, BEFORER, IN, United Kingdom
18.000095	Invoice A	Completed	05/29/2025	FISHER Lumber Associates SAREL, France
18.000094	inv1238	Completed	05/29/2025	Natix Hardwood Exports, United Kingdom
18.000093	inv1234	Completed	05/22/2025	FISHER Lumber Associates SAREL, France
18.000092	inv 224	Completed	06/25/2025	Natix Hardwood Exports, United Kingdom
18.000091	inv 123	Completed	06/22/2025	FISHER Lumber Associates SAREL, France
18.000090	inv 324	Completed	05/29/2025	Natix Hardwood Exports, United Kingdom
18.000089	Invoice 4567	Completed	05/29/2025	Natix Hardwood Exports, United Kingdom




AHA Statement Example

AHA Statement

AHA ID:
4306-3468-9567-5433

Creation date:
09/15/2025

Importer

American Hardwood Export Council
42777 Trade West Drive
Stelling
VA
20166

Importer

Forest Industries Intelligence Limited
The Little House
18 Church Street
Settle
North Yorkshire
BD24 9JE
United Kingdom

Container number

1254

Invoice number


1254

Products in shipment

American Hard maple	Mainly <i>Acer saccharum</i> . Very occasionally <i>Acer nigrum</i> .	10575Kg
Harvested	2025	
HS Codes	INT: 4407.93 EU: 4407.93.99 US: 4409.33.00.10	
Product type	Sawnwood: Sawn (exc. planed, sanded or end-jointed)	

Harvest state

New York

 Download legality risk assessment summary

 Download full legality risk assessment


Harvest counties: [Click here for more information on Deforestation risk assessment.](#)


[Cayuga](#) [Monroe](#) [Ontario](#) [Seneca](#) [Wayne](#)

American Cherry	<i>Prunus serotina</i>	5610Kg
Harvested	2025	
HS Codes	INT: 4409.29 EU: 4409.29.99 US: 4409.25.41.00	
Product type	Mouldings: Wood moldings: standard	

Harvest state

Ohio

 Download legality risk assessment summary

 Download full legality risk assessment

Harvest counties: [Click here for more information on Deforestation risk assessment.](#)


[Crawford](#) [Huron](#) [Richland](#) [Sandusky](#) [Seneca](#) [Wyandot](#)

Please note: This shipment includes American Hardwood products which have been sourced from one or more counties where the AHA risk assessment has identified an unaccepted risk of conversion to crops during the period of harvest. The exporter has confirmed that additional mitigation action has been undertaken to demonstrate negligible risk of conversion to crops at the harvest sites in this county (or counties). This was confirmed by Rupert Oliver of American Hardwood Export Council.

Description of action taken to mitigate risk of conversion to crops and any additional comments:

We source only from State Forests which are FSC certified in Wayne and Huron counties.

Origin Geo Data

 Download as GeoJSON file

American Hard maple Mainly *Acer saccharum*. Very occasionally *Acer nigrum* 10575Kg

```
[{"type": "FeatureCollection", "features": [{"type": "Feature", "properties": {"name": "Cayuga", "area": 191045, "geometry": {"type": "Polygon", "coordinates": [[[[-76.713006, 43.024034599058896], [-76.702324, 43.080158999056774], [-76.722002565712799, 43.337590195039649], [-76.684856, 43.35269099905824], [-76.630774, 43.41335599058119], [-76.617213732577582, 43.420175553523713], [-76.605012, 43.25356999058421], [-76.479224, 43.227518999058475], [-76.491941, 43.004963999058937], [-76.450738, 42.845759999059311], [-76.356974, 42.849449999059303], [-76.274675, 42.771258999059496], [-76.285584, 42.623587999059879], [-76.4584, 42.618614999059886], [-76.666543, 42.623455999058869], [-76.731636, 42.720399999059624], [-76.73674, 42.970285999059023]]]]}}, {"type": "Feature", "properties": {"name": "Monroe", "area": 173964, "geometry": {"type": "Polygon", "coordinates": [[[[-77.395698, 43.284962999058358], [-77.995389794958397, 43.965310254735817], [-77.994838, 43.365258999058199], [-77.816533, 43.54555999058243], [-77.808263409607193, 43.343207635956553], [-77.760231, 43.341160999058268], [-77.660359, 43.28297999905836], [-77.551022, 43.235762999058451], [-77.50092, 43.250362999058424], [-77.376051995953375, 43.274033762545379], [-77.371478, 43.034695999058883], [-77.485418, 43.034563999058868], [-77.482517, 42.943163999059081], [-77.580377, 42.943962999059075], [-77.759052, 42.940461999059082], [-77.730957, 42.96837199905897], [-77.906832, 42.987761999058975], [-77.904121, 43.03705999058879], [-77.905934, 43.1356099058659], [-77.99729, 43.132980999058667], [-77.995698, 43.284962999058358]]]]}}, {"type": "Feature", "properties": {"name": "Ontario", "area": 174304, "geometry": {"type": "Polygon", "coordinates": [[[[-77.61167, 42.763168999059516], [-77.580377, 42.940362999059075], [-77.482517, 43.034630999058868], [-77.371478, 43.034630999058883], [-77.246804, 43.2746604, 43.2746604, 43.2746604], [-77.215839, 43.03994399905886], [-77.133397, 43.012462999058933], [-76.962926, 43.013156999058928], [-76.901334, 42.861212999059269], [-76.971392, 42.76422299905952], [-77.313004, 42.761264999059513], [-77.337605, 42.732663999059591], [-77.369996, 42.655069999059791], [-77.366505, 42.576367999060011], [-77.455632, 42.576394999060009], [-77.490868, 42.577209999060005], [-77.466875, 42.670270999059754], [-77.398815, 42.671964999059746], [-77.61167, 42.763168999059516]]]]}}, {"type": "Feature", "properties": {"name": "Seneca", "area": 104145, "geometry": {"type": "Polygon", "coordinates": [[[[-76.981334, 42.661212999059269], [-76.963926, 43.013156999058928], [-76.713006, 43.024034599058936], [-76.731636, 42.970285999059023], [-76.731636, 42.720399999059624], [-76.666543, 42.623455999059069], [-76.58389, 42.54990999906007], [-76.656635, 42.546789999060088], [-76.895596, 42.541536999060099], [-76.895349, 42.65625499905979], [-76.947641, 42.759178999059522], [-76.971392, 42.76422299905952], [-76.961334, 42.861212999059269]]]]}}, {"type": "Feature", "properties": {"name": "Wayne", "area": 150236, "geometry": {"type": "Polygon", "coordinates": [[[[-77.376051995953375, 43.274033762545379], [-77.341092, 43.280660999058362], [-77.264177, 43.277362999058369], [-77.130429, 43.285634999058367], [-76.999691, 43.271455999058396], [-76.926174, 43.270691999058386], [-76.841675, 43.305398999058319], [-76.769025, 43.31845199905829], [-76.722002565712799, 43.337580195039649], [-76.702324, 43.080158999058774], [-76.713006, 43.024034599058896], [-76.963926, 43.013156999058928], [-77.133397, 43.012462999058933], [-77.215839, 43.03994399905886], [-77.246804, 43.03463099905886], [-77.246804, 43.034630999058861], [-77.371478, 43.034695999058883], [-77.376051995953375, 43.274033762545379]]]]}}]
```

American Cherry *Prunus serotina* 5610Kg

```
[{"type": "FeatureCollection", "features": [{"type": "Feature", "properties": {"name": "Crawford", "area": 104058, "geometry": {"type": "Polygon", "coordinates": [[[[-83.112737, 40.99344699906576], [-82.855614, 40.993665999065755], [-82.829512, 40.99662399906574], [-82.724792, 40.99637999065742], [-82.727164, 40.711202999067083], [-82.838905, 40.7125999067073], [-82.858302, 40.70501899906714], [-83.111136, 40.70291499906719], [-83.112737, 40.99344699906576]]]]}}, {"type": "Feature", "properties": {"name": "Huron", "area": 128936, "geometry": {"type": "Polygon", "coordinates": [[[[-82.841475, 41.290022999064469], [-82.342314, 41.283553999064488], [-82.344003, 41.211265999064793], [-82.344006, 41.202151999064839], [-82.336496, 41.065760999065425], [-82.436916, 41.06537999065437], [-82.432852, 40.992943999065758], [-82.724792, 40.996623999065742], [-82.829512, 40.99662399906574], [-82.838538, 41.21698999064771], [-82.840087, 41.25336999064596], [-82.841475, 41.290022999064469]]]]}}, {"type": "Feature", "properties": {"name": "Richland", "area": 1129659, "geometry": {"type": "Polygon", "coordinates": [[[[-82.724792, 40.996623999065742], [-82.432852, 40.992943999065758], [-82.420752, 40.823329999066544], [-82.339211, 40.72662999067009], [-82.338483, 40.638501999067437], [-82.336962, 40.555003999067843], [-82.374898, 40.550387999067882], [-82.623609, 40.549878999067879], [-82.644977, 40.666424999067303], [-82.627191, 40.70941599906709], [-82.689113, 40.711032999067079], [-82.727164, 40.711202999067083], [-82.724792, 40.996623999065742]]]]}}, {"type": "Feature", "properties": {"name": "Sandusky", "area": 106389, "geometry": {"type": "Polygon", "coordinates": [[[[-83.414626, 41.500227999063597], [-83.338196, 41.457507999063765], [-83.067459, 41.457163999063775], [-82.952224, 41.458238999063774], [-82.847804, 41.430515999063878], [-82.844565, 41.36239399906416], [-82.841475, 41.290022999064469], [-82.840087, 41.255336999064596], [-83.419843, 41.25400299906461], [-83.414626, 41.500227999063597]]]]}}, {"type": "Feature", "properties": {"name": "Seneca", "area": 142983, "geometry": {"type": "Polygon", "coordinates": [[[[-83.421054, 41.16677999064978], [-83.419843, 41.25400299906461], [-82.840087, 41.255336999064596], [-82.838538, 41.21698999064771], [-82.829512, 40.99662399906574], [-82.855614, 40.993665999065755], [-83.112737, 40.99344699906576], [-83.420319, 40.991888999065765], [-83.421054, 41.16677999064978]]]]}}, {"type": "Feature", "properties": {"name": "Wyandot", "area": 107308, "geometry": {"type": "Polygon", "coordinates": [[[[-83.514728, 40.905114999066164], [-83.45785, 40.991670999065768], [-83.420319, 40.991888999065765], [-83.112737, 40.99344699906576], [-83.11136, 40.70291499906719], [-83.304687, 40.710556, 40.687108999067199], [-83.419836, 40.686822999067203], [-83.495298, 40.701533999067109], [-83.495298, 40.809883999066609], [-83.515883, 40.818133999066568], [-83.514728, 40.905114999066164]]]]}}]
```


Legal Memo on AHA delivery of geolocation data at county level instead of property level

Cleary Gottlieb Steen & Hamilton LLP (CGSH) – September 2025

Key conclusions

- AHA county-level interpretation of EUDR geolocation avoids conflict with certain supra-legislative sources of EU law.
- These include the **general principles of proportionality**, the **freedom to conduct a business**, the **fundamental right to the protection of personal data**, as well as **international trade law agreements binding upon the EU**.
- It also **preserves the effectiveness of the EUDR’s geolocation data requirements and ensures fulfilment of EUDR objectives in the context of U.S. hardwoods**.

Recommendations

- The EC should clarify in its guidelines that a county-level approach is compliant with the EUDR in the context of wood in a low-risk country.
- The EC should remove the phrase “*within a single real-estate property*” from the definition of the “*plot of land*” for which geolocation data is required.
- “*Plot of land*” should be defined instead as “*land which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land*”.
- The Commission could propose this amendment as part of a next Omnibus simplification package or, at the latest, when EUDR is next subject to review, due by 30 June 2030.





American Hardwood Assured



Legal & deforestation-free proof of provenance

The forest demonstrates its own sustainability

The wood demonstrates its own provenance



American Hardwood Assured (AHA)

www.hardwood.us

rupert@americanhardwood.org

