Cearthsight

What volume of goods exported by the UK will be covered by the EUDR?

With the European Union Regulation on Deforestation-Free Products (EUDR) coming into effect at the end of 2025, pressure is growing on the UK government to announce its own plans for regulating British supply chains of forest-risk commodities. The European law will require beef, leather, palm oil, soy, timber, rubber, coffee and cocoa sold in the EU to be deforestation-free and legally produced.

In the UK, Schedule 17 of the Environment Act 2021 seeks to ban the import and sale of forest-risk commodities produced on illegally deforested land. Although the law was passed in 2021, it has not yet been implemented due to the absence of secondary legislation required for its enforcement. The previous UK government <u>announced its</u> <u>plans</u> for this legislation, but its proposal was full of loopholes, such as an exemption for businesses with under £50 million turnover or using less than 500 tonnes of each commodity, and weak due diligence requirements for companies.

One argument in favour of strong regulations in the UK is that **£5.3 billion worth of** existing UK exports to the EU will be covered by the EUDR – including paper, beef, chocolate and rubber tyres.

Which UK commodities are covered?

The majority of EUDR-liable exports from the UK are wood, pulp and paper – which make up 60 per cent of the total at £3.2 billion. The lion's share of this (£2.5 billion) is made up of paper and printed books.



Source: EUROSTAT data, average for 2020-2024

Rubber is also significant – primarily rubber tyres – at £715 million per year. Cocoa and chocolate make up £606 million per year. Cattle – primarily beef – makes up another £516 million in exports.

The full list of exports of product codes covered is provided below.

To comply with the EU law, **UK businesses exporting these goods will already be** required to trace these commodities to their source farm or plantation and ensure they were not produced illegally or on deforested land.

Implementing a strong supply chain regulation in the UK will ensure a level playing field for businesses. The high volume of UK exports that will already be covered by the EUDR suggests UK regulations should be just as robust, and in particular should require goods to be traceable to their place of harvest as required by the EUDR.

Cearthsight

UK exports of all EUDR-regulated goods to EU-27, average for 2020-2024

Source: EUROSTAT

Commodity	HS Code	HS Description	£ Average 2020-24
Cattle (beef &	010221	Pure-bred cattle for breeding	£359,782
	010229	Live cattle (excl. pure-bred for breeding)	£2,846,568
	0201	Meat of bovine animals, fresh or chilled	£306,943,087
	0202	Meat of bovine animals, frozen	£61,915,347
	020610	Fresh or chilled edible offal of bovine animals	£19,183,214
	020622	Frozen edible bovine livers	£64,690
	020629	Frozen edible bovine offal (excl. tongues and livers)	£6,783,282
	4101	Raw hides and skins of bovine "incl. buffalo" or equine animals, fresh, or salted, dried, limed, pickled or otherwise preserved, whether or not dehaired or split (excl. tanned, parchment-dressed or further prepared) Tanned or crust hides and skins of bovine "incl. buffalo" or	£34,649,964
leather)	4104	equine animals, without hair on, whether or not split (excl. further prepared)	£19,720,021
	4107	Leather further prepared after tanning or crusting "incl. parchment-dressed leather", of bovine "incl. buffalo" or equine animals, without hair on, whether or not split (excl. chamois leather, patent leather and patent laminated leather, and metallised leather)	£31,766,332
	160250	Prepared or preserved meat or offal of bovine animals (excl. sausages and similar products, finely homogenised preparations put up for retail sale as infant food or for dietetic purposes, in containers of a net weight of <= 250 g, preparations of liver and meat extracts and juices)	£31,665,789
		Total Cattle	£515,898,076
	1801	Cocoa beans, whole or broken, raw or roasted	£6,368,272
Cocoa	1802	Cocoa shells, husks, skins and other cocoa waste	£17,371
	1803	Cocoa paste, whether or not defatted	£41,084,532
	1804	Cocoa butter, fat and oil	£36,985,647
	1805 1806	Cocoa powder, not containing added sugar or other sweetening matter Chocolate and other food preparations containing cocoa	£3,144,540 £517,927,775
		Total Cocoa	£605,528,137
Coffee	0901	Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion Total Coffee	£137,674,369 £137,674,369
		Palm nuts and kernels(2012-2500);Palm nuts and kernels,	
Palm Oil	120710	whether or not broken(1988-2006)	£2,550

		Palm oil and its fractions, whether or not refined (excl.	
	1511	chemically modified)	£13,520,849
	151321	Crude palm kernel and babassu oil	£11,834
		Palm kernel and babassu oil and their fractions, whether or	
	151329	not refined, but not chemically modified (excl. crude)	£831,021
		Oilcake and other solid residues, whether or not ground or in the form of pellets, resulting from the extraction of palm nuts	
	230660	or kernels	£813,547
	290545	Glycerol	£2,154,174
	291570	Palmitic acid, stearic acid, their salts and esters	£4,986,226
		Saturated acyclic monocarboxylic acids, their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulphonated, nitrated or nitrosated derivatives (excl. formic acid and acetic acid, mono-, di- or trichloroacetic acids, propionic acid, butanoic and pentanoic acids, palmitic and	
	291590	stearic acids, their salts and esters, and acetic anhydride)	£44,379,991
	382311	Stearic acid, industrial	£154,301
	382312	Oleic acid, industrial	£55,962
		Fatty acids, industrial, monocarboxylic; acid oils from refining	
	382319	(excl. stearic acid, oleic acid and tall oil fatty acids)	£6,857,209
	382370	Fatty alcohols, industrial	£3,557,536
		Total Palm Oil	£77,325,200
	4001	Natural rubber, balata, gutta-percha, guayule, chicle and similar natural gums, in primary forms or in plates, sheets or strip	£2,650,124
Rubber	4005	Compounded rubber, unvulcanised, in primary forms or in plates, sheets or strip (excl. mixtures of natural rubber, balata, gutta-percha, guayule, chicle and similar natural gums containing synthetic rubber or factice derived from oils)	£104,281,322
	4006	Rods, bars, tubes, profiles and other forms of unvulcanised rubber, incl. mixed rubber, and articles of unvulcanised rubber, incl. mixed rubber (excl. plates, sheets and strip which, apart from basic surface-working, have not been cut, or have merely been cut into square or rectangular shapes)	£3,453,345
	4007	Vulcanised rubber thread and cord (excl. ungimped single thread with a diameter of > 5 mm and textiles combined with rubber thread, e.g. textile-covered thread and cord)	£2,740,492
		Plates, sheets, strip, rods and profile shapes, of vulcanised	,,.
	4008	rubber (excl. hard rubber)	£30,978,377
	4010	Conveyor or transmission belts or belting, of vulcanised rubber	£87,119,110
	4011	New pneumatic tyres, of rubber	£209,124,148
	4012	Retreaded or used pneumatic tyres of rubber; solid or cushion tyres, tyre treads and tyre flaps, of rubber	£40,653,250
	4013	Inner tubes, of rubber	£842,320

	4015	Articles of apparel and clothing accessories, incl. gloves, mittens and mitts, for all purposes, of vulcanised rubber (excl. hard rubber and footwear and headgear and parts thereof)	£23,224,285
	4016	Articles of vulcanised rubber (excl. hard rubber), n.e.s.	£208,847,008
	4017	Hard rubber, e.g. ebonite, in all forms, incl. waste and scrap; articles of hard rubber, n.e.s.	£684,163
		Total Rubber	£714,597,945
	1201	Soya beans, whether or not broken	£1,178,032
Soya	120810	Soya bean flour and meal	£4,193,117
	1507	Soya-bean oil and its fractions, whether or not refined (excl. chemically modified)	£21,331,599
	2304	Oilcake and other solid residues, whether or not ground or in the form of pellets, resulting from the extraction of soya-bean oil	£52,571,878
	2004	Total Soya	£79,274,627
	44	Wood and articles of wood, wood charcoal	£371,711,120
	47	Pulp of wood or of other fibrous cellulosic material; recovered (waste and scrap) paper or paperboard	£137,797,895
	40	Paper and paperboard, articles of paper pulp, of paper or of	04 470 000 400
	48	paperboard	£1,476,928,138
	49	Printed books, newspapers, pictures and other products of the printing industry; manuscripts, typescripts and plans	£980,428,362
	940131	Swivel seats with variable height adjustments, of wood (excl. medical, surgical, dental or veterinary, and barbers' chairs)	£1,584,750
Wood, pulp	940141	Seats, convertible into beds, of wood (excl. garden seats and camping equipment, and medical, dental or surgical furniture)	£447,532
and paper		Upholstered seats, with wooden frames (excl. convertible into	
	940161	beds)	£42,435,294
	940169	Seats, with wooden frames (excl. upholstered)	£4,882,994
	94019030	Parts of seats, of wood, n.e.s.	£289,106
	94019030	Parts of seats, of wood, n.e.s.	£4,691,271
	940330	Wooden furniture for offices (excl. seats)	£24,419,139
	940340	Wooden furniture for kitchens (excl. seats)	£23,182,688
	940350	Wooden furniture for bedrooms (excl. seats)	£17,618,385
	940360	Wooden furniture (excl. for offices, kitchens and bedrooms, and seats)	£64,207,504
	940391	Parts of furniture, of wood, n.e.s. (excl. of seats or medical, surgical, dental or veterinary furniture)	£15,620,190
	940610	Prefabricated buildings of wood, whether or not complete or already assembled	£31,578,551
		Total Wood	£3,197,822,919
	1	TOTAL	