

EUDR requirements for the Leather sector

Essentials guide

What is the EUDR?

The EU Deforestation-free Products Regulation (EUDR) is a legislation that concerns **all exports from and imports to the EU market** relating to the following **seven commodities: cattle, soy, palm oil, wood, coffee, cocoa, and natural rubber, as well as products derived from these commodities, such as leather, chocolate or furniture.**

The **operator**, i.e. the company placing these products on the EU market or exporting from it, are legally obliged to self-certify that the goods are not linked to deforestation and were produced in compliance with the national regulations in the production country (**the products are deforestation-free and legal**). To support their statement, operators **need to provide the exact geolocation of the production site** to EU authorities.

For cattle products, the production site refers to all establishments where the cattle has been kept since birth, as well as the slaughterhouse.

These operators are also required to cross-check their compliance through a **due diligence process**. This means that they are expected to analyse their supply chain for compliance with regulatory standards (e.g. are labour rights exercised, i.e. do all employees have contracts at the farm). **Suppliers to the EU market are often not legally responsible under the EUDR**, since the import is conducted by their buyers. These suppliers may be approached by their buyers requesting data and documentation to show the deforestation-free and legal nature of their operations.

Why is the EUDR important?

The EUDR is a **Market Access Requirement for the EU Market**, hence exporters/importers must ensure their products comply. Non-compliance could lead to confiscation of goods, fines or bans from trading in the EU. Compliance with EUDR may also provide a **competitive advantage** in the EU and other markets to showcase more sustainable practices.

When does it apply?

The regulation came into force on June 29, 2023 and **will be applied from December 30, 2025.**

Commodities affected by EUDR



Palm oil



Rubber



Soybean



Cocoa



Timber

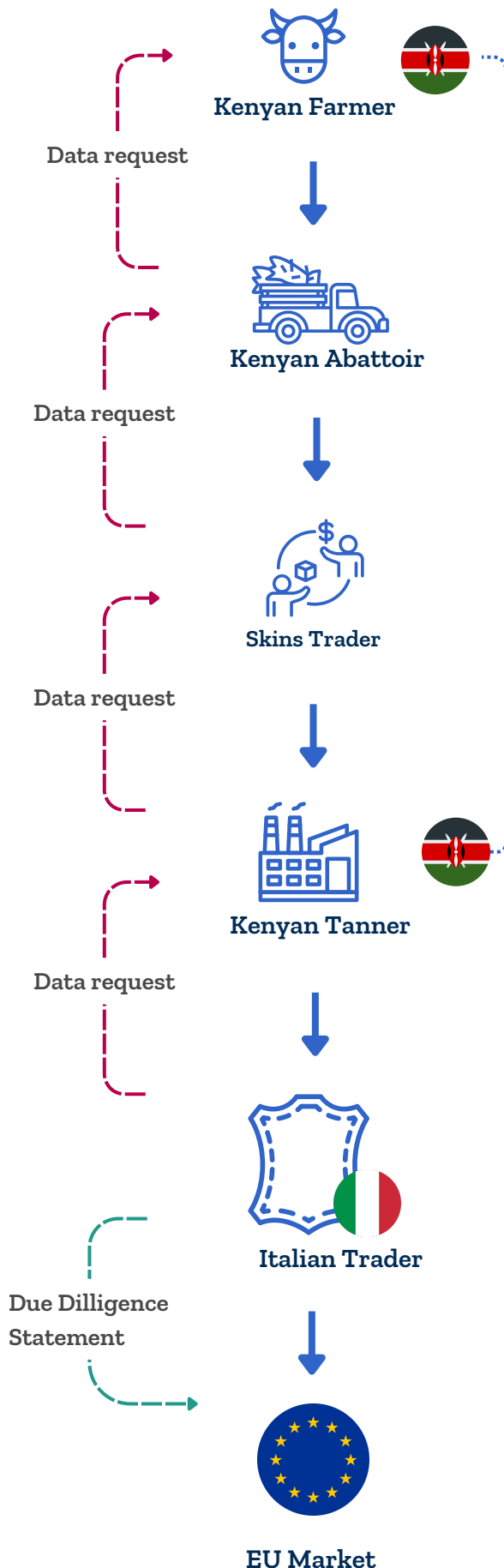


Cattle



Coffee

EUDR requirements - Example from a leather value chain



A cattle farmer in Kenya sells cattle on to the local abattoir. A tanner procures cattle hides and skins from the abattoir.

The tanner prepares the hides and skins and sells them on as leather to a trader from Italy.

The Italian Trader imports the leather hides to the EU, this means, they place them on the EU market.

For this scenario, **none of the entities based in the producer country, Kenya, have any direct obligations under the EUDR**, as they are not themselves placing products on the EU market.

The **Italian Trader** is the owner of the leather before it enters the EU and imports them to the EU market ("places the products on the EU market"). Therefore, this company **qualifies as an operator** with the obligation to provide necessary data to the EU authorities upon import.

The **required data** includes the **geolocation of production (all establishments where the cattle has been kept)** and a declaration confirming that due diligence has been conducted to ensure the leather has been produced in a **deforestation-free and legally compliant manner**.

To fulfill this obligation, the **Italian Trader will request relevant information from its supplier**, as key details regarding the origin of the leather and compliance with local regulations (in this case, Kenya's national legal framework) originate from the primary producer, the farmer, and other supply chain actors.

Practical steps around EUDR data requests

1

Understand EUDR Data Requirements

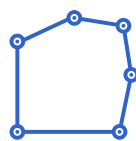
Identify the data needed for EUDR compliance, including product origin (geolocation), and production practices.



Company Information

Producer Information: Basic details about the farmer or cooperative, such as name or identifier (can be anonymized if needed).

Product Details: Information about the type, quantity, and production date of the commodity. For cattle products, including leather, the production date refers the day of slaughter, the time range of production from birth to this date.



Land plot

Product Origin: The location where the product was grown, including geolocation data (e.g., GPS coordinates). For cattle products, including leather, this refers to the single point of geolocation coordinate of the birthplace of the animal, farm(s) where it was fed, as well as the abattoir.



Documents

Supporting documentation on Legality: Evidence that the production followed the national legality framework. For example official registration documents, certification or documented practices.

2

Explore Compliance Tools

Review tools like traceability software or certification programs to support compliance. Choose manual or digital approaches based on your preferences.

Costs: Clarify who pays (supplier, buyer, etc.).

Interoperability: Ensure EU system compatibility.

Exportability: Data in usable, compliant formats.

Ownership: Users control data with update/removal options.

Confidentiality: Secure hosting with flexible updates.

Risk Mitigation: Support due diligence needs.

3

Data Collection

Gather accurate records on product origin, including geo-coordinates and production practices.

4

Manage Data Governance

Ensure you retain ownership of your data , and that you have control over who wants to access it.

5

Connect with Buyers

Exchange with buyers on your efforts and reassure them of your commitment; encourage any support measures, if needed.

EUDR Scope of the leather sector

For the sector, the following commodities are mainly relevant under the EUDR:

- ex 4101 **Raw hides and skins of cattle** (fresh, or salted, dried, limed, pickled or otherwise preserved, but not tanned, parchment-dressed or further prepared), whether or not dehaired or split
- ex 4104 **Tanned or crust hides and skins of cattle**, without hair on, whether or not split, but not further prepared
- ex 4107 **Leather of cattle**, further prepared after tanning or crusting, including parchment- dressed leather, without hair on, whether or not split, other than leather of heading 4114



Leather goods such as shoes, handbags or jackets are currently not in scope of the EUDR. For the full list of EUDR relevant commodities, please refer to Annex I of the regulation:



The European Union (EU)- East African Community (EAC) MARKUP II funded by the EU, aims to enhance economic development in the EAC through sustainable intra-African and EU-Africa trade.

Focused on improving livelihoods, employment, and export competitiveness for MSMEs, the programme supports the development of key export-oriented value chains as well institutional support in the six MARKUP II EAC recipient partner countries. EU-EAC MARKUP II is promoting exports and investment through addressing trade barriers, value addition, quality compliance, trade facilitation and technology transfer.

EU-EAC MARKUP II is implemented by the International Trade Centre in collaboration with the EAC Secretariat and national partners in the recipient countries. Under the project, ITC supports EUDR preparedness in the cocoa, coffee and leather value chains. This guide was developed as part of these efforts.

More about the program:



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