

## EUDR – European Union Deforestation Regulation

June 5th, 2025

**Dear Customer,**

In the context of the EUDR Regulation (EU) 2024/6789, which will take effect on December 30, 2025, we would like to inform you of the approach adopted by Papeteries des Vosges and Papeteries du Léman (PDV & PDL) to ensure EUDR compliance.

- **Current Regulations:**

Papeteries des Vosges and Papeteries du Léman are currently compliant with the EUTR, which has been in effect since March 3rd, 2013. This European directive requires Operators – those first placing wood or wood-based products on the EU market – to take appropriate measures to ensure that such products do not originate from illegal sources.

We apply a proactive due diligence approach, structured around a three-step system: information gathering, risk analysis, and risk mitigation. Additionally, we are certified under FSC and PEFC standards.

- **EUDR Principles:**

The EUDR is similarly based on a Due Diligence process comprising three main stages:

1. **Information gathering** (annual, per supplier, with review and reporting);
2. **Risk assessment:** Country risk classifications have not yet been released, so we do not currently know which countries will be considered at risk. However, only products from moderate- or high-risk countries will require risk mitigation measures;
3. **Risk mitigation:** While the required documentation has yet to be finalized, it will be mandatory to collect evidence of pulp origin. Independent audits of our suppliers will be conducted.

In continuity with EUTR, some audits are already being carried out, and EUDR requirements will be progressively integrated into these.

- **Regulation Management:**

Papeteries des Vosges and Papeteries du Léman management are fully engaged in the EUDR compliance process, with information and responsibilities shared across departments

(Purchasing, Sales, Quality, and IT). Our goal is to comply with the EUDR Regulation (EU) 2024/6789 by its enforcement date.

We are currently finalizing the agreement with the SaaS solution provider **Osapiens**, which will support us in managing Due Diligence Statements (DDS) and preparing for integration with the TRACES platform. We are organizing internally to:

- collect DDS data from our suppliers;
- manage DDS linked to the pulp-to-paper transformation process;
- associate these DDS with our finished products in order to provide a complete DDS to our customers.

As part of this implementation, we will soon be able to invite customers to test the system using fictitious data, allowing us to trial the TRACES platform in real conditions.

We remain dependent on the progress made by our suppliers and are therefore actively monitoring their developments:

- holding monthly meetings;
- requesting updates on key milestones;
- conducting regular progress reviews and on-site visits.

In parallel, we have registered on the TRACES platform and are preparing the integration of end-to-end lot traceability in our production system. We are benchmarking peers and have established an internal working group to support this transformation.

We are pleased to inform you that we are on track to be fully compliant with EUDR requirements by the end of December 2025.

Sincerely,

**Deborah CIBELLO**

Purchasing Manager

Papèteries du Léman

