

CONTROLLED EXTERNAL REGULATORY SUPPLEMENT

EU DEFORESTATION REGULATION

External Supplement Appendix

Product Origin, Geolocation and Due Diligence Evidence Governance

v1.0 | 11 August 2026

CORE PROPOSITION A due diligence statement is not the beginning of the evidence process. It is an authorised regulatory output produced from an upstream chain of product, origin, geolocation, legality, risk and mitigation evidence.

A controlled external regulatory reference layer for EMJ.NEXUS evidence infrastructure. This edition governs how EUDR-related sources, actors, products, plots, geolocation records, legality evidence, risk decisions, mitigation actions, declarations and continuing-evidence events may be linked without amending the canonical 128 MME Mapping or transferring statutory responsibility to EMJ.LIFE.

Document Control

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Executive Statement

Regulation (EU) 2023/1115, as amended, prohibits relevant commodities and relevant products from being placed or made available on the Union market or exported unless they are deforestation-free, produced in accordance with relevant legislation in the country of production, and covered by the required due diligence statement or simplified declaration. The regulated output depends on an upstream evidence chain that is frequently distributed across procurement, supplier, geographic, legal, customs, production and information-system records.

This Appendix defines an evidence-governance architecture for connecting those records. It does not determine legal compliance. It establishes how an enterprise may identify, version, associate, review, escalate, retain and package the evidence used by legally responsible and authorised actors.

GOVERNING PRINCIPLE Product traceability does not, by itself, establish EUDR eligibility. A regulated decision requires controlled relationships among product and commodity identity, production origin, geolocation, production time, legality, deforestation status, risk, mitigation and authorised submission.

Purpose

- Establish a controlled EUDR external-regulatory reference layer for EMJ.NEXUS.
- Translate statutory evidence dependencies into identified tasks, Evidence Units and authorised decision records.
- Preserve legal-source hierarchy, product-scope versioning, geolocation provenance, supply-chain lineage and due-diligence state.
- Enable protected enterprise Evidence Packages and limited public provenance disclosures.
- Prevent automation, mapping coverage or data availability from being represented as legal compliance.

Institutional boundary

EMJ.LIFE and EMJ.NEXUS do not act as an operator, trader, downstream operator, authorised representative, customs authority, competent authority, auditor, certifier, verifier, legal adviser or regulatory decision-maker merely by providing this architecture. The legally responsible actor retains responsibility for the completeness and accuracy of information, due diligence performed, conclusion reached, declaration submitted and product decision made.

1. Authority and Non-Amendment Boundary

1.1 Controlling source hierarchy

Layer	Source class	Function	Authority / control
A	Regulation (EU) 2023/1115 and amending Regulations (EU) 2024/3234 and 2025/2650	Statutory scope, prohibition, roles, duties, checks, remedies and application dates.	EU legislature; competent and judicial authorities.
B	Commission implementing and delegated acts in force	Country benchmarking, Information System operation and product-scope detail.	European Commission under delegated/implementing authority; subject to legal status.
C	Official Guidance, FAQ, user manuals and Commission communications	Non-binding implementation support and operational clarification.	Commission services; legal texts prevail.
D	Operator-controlled evidence and authorised decisions	Enterprise application, risk assessment, mitigation and submission.	Legally responsible operator or other authorised actor.
E	EMJ.LIFE External Supplement	Evidence structure, provenance, state, version, escalation and packaging controls.	EMJ.LIFE governance boundary; no regulatory authority.

1.2 Non-amendment statement

- No change to the canonical 38-field Physical Interface.
- No change to the six Governance Masters or six Direct Mapping Guidelines.
- No change to existing 128 MME task identities, Task Tags, points, value factors, weights, RCF, MCP, AEU or NTCC logic.
- No addition of EUDR as a tenth core mapping framework; EUDR is an external regulatory application layer.
- No conversion of EUDR evidence into an Evidence Tier, assurance opinion, certification, rating or public compliance claim.
- No automatic product-scope, operator-role, country-legislation, deforestation-free, risk, mitigation or market-access decision.

DECISION BOUNDARY Evidence infrastructure may establish provenance, association, review state and decision lineage. It cannot, by itself, establish that a product satisfies Article 3 or may lawfully be placed, made available or exported.

2. Controlled Regulatory Baseline

Source ID	Official source	Status at cut-off	Controlled use
EU-EUDR-BASE-2023-1115	Regulation (EU) 2023/1115	In force; consolidated text current to 26 Dec 2025	Core statutory basis.
EU-EUDR-AMEND-2024-3234	Regulation (EU) 2024/3234	In force	First application-date amendment.
EU-EUDR-AMEND-2025-2650	Regulation (EU) 2025/2650	In force	Role, submission, simplified-declaration and application-date amendments.
EU-EUDR-BENCH-2025-1093	Commission Implementing Regulation (EU) 2025/1093	In force	Country low/high-risk list; unlisted jurisdictions remain standard risk under the governing framework.

Source ID	Official source	Status at cut-off	Controlled use
EU-EUDR-IS-2024-3084	Commission Implementing Regulation (EU) 2024/3084	Earlier Information System act; read with successor/amendment status	Historical Information System rules and lineage.
EU-EUDR-IS-2026-1565	Commission Implementing Regulation (EU) 2026/1565	Adopted July 2026	Updated Information System technical rules, including simplified declarations and API-related operation.
EU-EUDR-GUIDE-2026-3896	Commission Guidance, C/2026/3896	Official non-binding guidance	Interpretive and operational support; not a substitute for law.
EU-EUDR-FAQ-V5	Frequently Asked Questions, Version 5, April 2026; published 4 May 2026	Non-binding Commission-services working document	Implementation clarification and examples.
EU-EUDR-DA-SCOPE-2026-07	Delegated Act adopted 13 July 2026 updating Annex I	Under Parliament/Council scrutiny at cut-off; do not treat as in force	Pending product-scope change event; added products scheduled for 30 Dec 2027 if the act enters into force.
EU-EUDR-REPORT-2026-191	COM(2026) 191 final	Commission report, 4 May 2026	Simplification history, implementation status and future repositories.

VERSION LOCK A webpage, FAQ, product list, country classification or Information System schema does not silently update an existing Evidence Package. Each change requires source registration, legal-status classification, impact assessment and controlled release.

3. Regulatory Architecture and Application Dates

3.1 Article 3 prohibition structure

Condition	Required regulated state	Evidence-infrastructure consequence
Deforestation-free	Relevant product satisfies the statutory deforestation-free definition and, for wood, applicable forest-degradation condition.	Preserve plot geometry, cut-off-date evidence, commodity-specific logic, remote-sensing/supporting sources, review and limitations.
Relevant legislation	Production complies with relevant legislation of the country of production.	Maintain jurisdiction-, time- and subject-specific legal evidence; do not reduce legality to a supplier declaration.
Regulatory output	Product is covered by a DDS or simplified declaration as required.	Link declaration content and identifier to the upstream evidence and authorised actor; preserve amendments, withdrawals and supersession.

3.2 Application dates

Actor / situation	Application date	Control consequence
Large and medium operators	30 December 2026	Full readiness, role, product, plot, legality, risk, mitigation and submission controls must be operational.
Micro and small operators already covered by the EU Timber Regulation	30 December 2026	Transition evidence and EUTR relationship must be preserved.
Other micro and small operators	30 June 2027	Deferred date must be linked to actor-size evidence; no assumed exemption.

Actor / situation	Application date	Control consequence
New products added by July 2026 Delegated Act, if it enters into force	30 December 2027	Maintain PENDING-LEGAL-EFFECT until scrutiny and publication are complete.

3.3 Transition evidence

Where a commodity or product was placed on the Union market during the transitional period, later downstream use may depend on adequately conclusive and verifiable evidence of that earlier placement. The system must preserve customs, production, invoice, felling, ear-tag or other appropriate records with dates, product identity and supply-chain linkage. A transition flag without supporting evidence is insufficient.

4. Actor and Responsibility Model

Actor state	Primary evidence responsibility	System control	Prohibited inference
Operator	Exercises due diligence before first placement or export; submits DDS where required; assumes responsibility.	Bind legal entity, role, product event, authorised user, due-diligence version and submission identifier.	Platform activity does not transfer operator responsibility.
Micro or small primary operator	May use one-time simplified declaration if statutory conditions are met.	Preserve size, primary-production, low-risk geography, plot and declaration-identifier eligibility evidence.	Small size alone does not establish eligibility.
First downstream operator / trader	Collects applicable reference numbers or declaration identifiers received directly from upstream operator, plus business-partner information.	Preserve first-downstream determination, direct supplier and identifier lineage.	Receipt of an identifier is not independent proof of Article 3 compliance.
Other downstream operator / trader	Maintains applicable direct-business-partner information and responds to substantiated concerns under governing rules.	Preserve counterparties, transaction chain, concerns and escalation.	Downstream status is not assumed from internal labels.
Authorised representative	May perform authorised submission functions within mandate.	Bind mandate, scope, duration, principal and submission activity.	Representative does not become the responsible operator merely through submission.
Competent / customs authority	Performs statutory checks, controls and decisions.	Record requests, holds, responses and outcomes without altering authority record.	EMJ.NEXUS cannot simulate or pre-empt authority decisions.

4.1 Role-determination gate

1. Identify the legal entity and establishment jurisdiction.
2. Identify the precise placing, making-available, import or export event.
3. Determine whether the entity is the first operator, a downstream operator or a trader for that event.
4. Determine SME and primary-operator status using controlled evidence.
5. Determine whether an authorised representative is acting and verify the mandate.
6. Record unresolved role questions as REVIEW-REQUIRED; do not inherit a role from a vendor master or contract label.

5. Product, Commodity and Transaction Identity

5.1 Minimum product identity

Field group	Minimum controlled attributes	Control objective
Commodity	cattle; cocoa; coffee; oil palm; rubber; soya; wood	Establish relevant-commodity relation.
Product	description; CN/HS code; nomenclature edition; Annex I version; quantity; unit; batch/lot	Establish scope candidate and transaction identity.
Transformation	input products; output product; processing site; production event; mass-balance or segregation method	Preserve lineage through derived/composite products.
Market event	placing / making available / export; date; customs procedure; shipment; destination	Determine relevant regulated event.
Scope status	IN-SCOPE; OUT-OF-SCOPE; REVIEW-REQUIRED; PENDING-LEGAL-EFFECT	Avoid silent or stale product classification.

5.2 Scope versioning

Every product-scope decision must cite the Annex I version and legal effect date used. The July 2026 Delegated Act is registered as a pending Regulatory Change Event until scrutiny and entry into force are confirmed. Existing products, removed products, exemptions and newly added products must not be applied to periods for which the relevant legal text is not operative.

NO-SCOPE INFERENCE A commercial description, supplier category, generic HS code match or platform tag does not establish final EUDR scope. Classification evidence and an authorised legal/customs decision remain required where uncertainty is material.

6. Plot, Geolocation and Production-Time Evidence

6.1 Evidence object model

Object	Minimum attributes	Validation / review
Production plot	plot_id; producer; tenure/rights reference; country/region; commodity; validity period	Identity uniqueness, ownership/authority boundary and duplication checks.
Geolocation	latitude/longitude or polygon; coordinate system; precision; capture method; source; capture date	Geometry validity, coordinate-order, range, closure, area and provenance checks.
Production event	production date or time range; harvest/slaughter/felling date where relevant; quantity; lot	Temporal consistency with plot, product and transaction.
Source evidence	survey; government registry; farm record; geospatial dataset; certificate; supplier record	Issuer, version, access rights, authenticity indicators and limitations.
Deforestation assessment	cut-off reference; data sources; method; reviewer; finding; confidence/limitations	No single map is treated as definitive solely by being available.
Forest-degradation assessment	wood-specific source, classification, method and conclusion	Commodity-specific application and authorised review.

6.2 Geometry controls

- Preserve the originally received geometry and a validated working geometry as distinct versions.
- Record point-versus-polygon logic, coordinate reference system and any conversion performed.

- Reject or escalate impossible coordinates, self-intersecting polygons, missing vertices, duplicate geometries and plot-country mismatches.
- Do not smooth, simplify or repair supplier geometry without preserving the original and documenting the transformation.
- Link every plot used in a DDS to the precise product quantity, production event and supply-chain path it supports.
- Apply access controls to sensitive farm, producer and personal data.

6.3 Mixed and bulk consignments

Where commodities from multiple plots or sources are mixed, the Evidence Package must retain every contributing plot and prevent inclusion of material from unknown or non-compliant sources. The system must support segregation, mass-balance or other applicable chain-of-custody records only as evidence methods; it must not infer regulatory acceptance of a method without authorised determination.

7. Relevant-Legislation Evidence

Article 2(40) and Article 9 require attention to the relevant legislation of the country of production. Legality is jurisdictional, time-specific and fact-specific. It cannot be represented by a global pass/fail field without the underlying legal domains, sources and evidence.

Legal domain	Illustrative evidence	Required control
Land-use rights	title, lease, concession, permit, cadastral or customary-right record	Jurisdiction, issuer, holder, plot, validity and challenge status.
Environmental protection	permits, protected-area checks, environmental authorisations	Applicable rule, location, activity and validity.
Forest-related rules	harvesting/felling permit, forest-management record	Species/product, plot, volume, period and authority.
Third-party rights	community consultation, access rights, grievance or consent record	Affected parties, process, unresolved claims and remedy status.
Labour rights	employment, forced-labour and workplace evidence where applicable to production legality	Site, workforce scope, source credibility and unresolved allegations.
Human rights / FPIC	indigenous and local-community rights, consultation and consent evidence	Rights-holder identity, process, outcome and continuing concerns.
Tax, anti-corruption, trade and customs	tax/royalty payment, licence, trade and customs documentation	Entity, transaction, authority, period and authenticity.

7.1 Legality-source hierarchy

7. Identify the applicable jurisdiction and production period.
8. Identify the relevant legal domain and controlling official source.
9. Record the legal-source version, effective dates and translation status.
10. Link fact evidence to the precise plot, producer, product and activity.
11. Record review owner, unresolved conflicts and limitations.
12. Reassess when the law, permit, rights status, supplier or production location changes.

8. Due Diligence Evidence Lifecycle

Stage	Regulatory function	Evidence-infrastructure control	Output state
1. Intake	Identify actor, product and regulated event.	Identity binding; role and scope gate.	INTAKE-COMPLETE / REVIEW-REQUIRED
2. Information collection	Collect Article 9 information and supporting evidence.	Completeness, provenance, plot/product linkage and gaps.	INFORMATION-COMPLETE / EVIDENCE-GAP
3. Risk assessment	Assess risk under Article 10 where required.	Criteria, sources, assumptions, concerns and reviewer.	NEGLIGIBLE-RISK / NON-NEGLIGIBLE-RISK / REVIEW-REQUIRED

Stage	Regulatory function	Evidence-infrastructure control	Output state
4. Risk mitigation	Apply Article 11 measures where risk is non-negligible.	Action, owner, evidence request, supplier response and residual risk.	MITIGATION-OPEN / MITIGATION-COMPLETE
5. Authorised conclusion	Responsible actor concludes whether Article 3 conditions are satisfied.	Decision record, authority, basis, date and limitations.	APPROVED-FOR-SUBMISSION / REJECTED / HOLD
6. Submission	Submit DDS or simplified declaration where applicable.	Payload version, user, mandate, timestamp, reference and verification/declaration identifier.	SUBMITTED / AMENDED / WITHDRAWN
7. Market event	Place, make available or export only under authorised state.	Transaction-to-declaration link and customs/market record.	RELEASED / BLOCKED / HELD
8. Continuing evidence	Respond to new information, concerns, checks or source changes.	Reopen, notify, supersede, remediate and retain history.	CURRENT / REOPENED / SUPERSEDED

8.1 Completeness is not credibility

A complete field set may still contain unreliable, inconsistent, stale or unsupported evidence. The system therefore separates field completeness, source credibility, relationship integrity, legal review and authorised decision status. None may be collapsed into a single compliance score.

9. Risk Assessment and Mitigation Governance

9.1 Risk-assessment record

Control group	Minimum record
Assessment identity	assessment_id; operator; product population; period; assessor; reviewer; rule version
Country context	country/part; benchmark status; effective date; source version
Supply-chain complexity	number and type of tiers/nodes; mixing; transformations; traceability gaps
Deforestation / degradation factors	forest presence, land-use change sources, cut-off analysis, wood-specific degradation factors
Legality factors	applicable legal domains, permits, rights disputes, sanctions, corruption or enforcement indicators
Third-party information	substantiated concerns, NGO/media/authority information, certification and audit evidence
Conflict analysis	contradictions, missing records, source hierarchy and resolution
Conclusion	negligible / non-negligible / review required; rationale; authorised approval; date

9.2 Simplified due diligence

Low-risk classification may permit simplified due diligence under Article 13, but it does not remove Article 9 information requirements or permit an operator to ignore information indicating a risk of non-compliance. The system must retain the benchmark source, effective date and the evidence supporting use of the simplified route. Any relevant risk information reopens the assessment and may require Articles 10 and 11 controls.

9.3 Mitigation action register

Field	Required content
risk_issue	Specific non-negligible risk or evidence conflict.
action	Additional information, independent survey/audit, supplier requirement, plot exclusion, segregation, remediation or other measure.
owner / due date	Authorised accountable actor and target date.
evidence_received	Source, date, scope, authenticity and relationship to the risk.
residual_risk	Post-action assessment and rationale.
closure_authority	Person authorised to accept closure or maintain a hold.
decision-use	Products, lots, DDSs and transactions affected.

10. Due Diligence Statement and Simplified Declaration Controls

10.1 DDS minimum linkage

- Operator identity and identifier used in the Information System.
- Relevant product description, HS/CN code, quantity and unit.
- Country of production and geolocation of all relevant plots.
- Production date or time range.
- Information on wood species where applicable.
- Due-diligence system and risk-assessment version.
- Authorised conclusion that no or only negligible risk was found.
- Submission payload, timestamp, submitting user and mandate.
- Reference number and verification number.
- Any amendment, withdrawal, authority review, downstream use or supersession relationship.

10.2 Amendment and withdrawal

Information System rules include time- and event-dependent limits on amendment or withdrawal. A submission must therefore be immutable as an historical event. A corrected record creates a new controlled version and relationship; it does not erase what was submitted, used or communicated. The current Information System act and user documentation must be checked at the actual submission date.

10.3 Simplified declaration

A micro or small primary operator route requires evidence that the actor, production activity and geography satisfy the statutory conditions. The one-time declaration identifier must be linked to the operator and relevant plots, maintained after major changes, and communicated downstream where required. A generic SME label or supplier assertion is not sufficient.

SUBMISSION RULE The reference number, verification number or declaration identifier proves that a system event occurred. It does not independently prove the correctness of the upstream evidence or the product's compliance.

11. Information System, API and Identity Boundary

Interface object	EMJ.NEXUS control	Boundary
EU Login / user	Internal user-to-authorised-actor and mandate record.	No creation or control of EU Login identity.
DDS / simplified declaration payload	Payload schema version, validation, hash, submission and response log.	Official Information System remains authoritative for acceptance and identifiers.
Reference / verification number	Protected identifier linked to product population and submission.	Verification numbers require strict access controls.

Interface object	EMJ.NEXUS control	Boundary
API / web service	Endpoint/specification version, request id, timestamp, response, error and retry history.	No reliance on undocumented or stale API behaviour.
Risk status / authority interaction	Record received status, request or decision with source and time.	No local substitution for competent-authority status.
Contingency procedure	Outage evidence, approved contingency route and later reconciliation.	Use only where official rules permit.

11.1 D-U-N-S and KYB

D-U-N-S and KYB may support enterprise-node identity, uniqueness and counterparty validation. They do not replace the legal identifiers, registrations or role determinations required by the EUDR Information System, customs law or competent authorities. The Evidence Package must preserve both the EMJ.NEXUS identity binding and the official identifier used for the regulated event.

11.2 Data protection and access

- Restrict plot, producer, verification-number and personal data to authorised roles.
- Separate public DOI metadata from protected operational evidence.
- Record disclosure purpose, recipient, legal basis and time where required.
- Apply retention and deletion rules without destroying regulatory audit evidence that must be kept.
- Do not publish precise smallholder locations, personal details or commercial volumes by default.

12. 128 MME Enterprise Application

OPERATING PRINCIPLE 128 MME supplies the enterprise task-and-evidence architecture. This EUDR External Supplement supplies the regulatory application layer. Together they support EUDR evidence readiness; neither mapping coverage nor a system output establishes legal compliance.

12.1 Reusable mapping contexts

Canonical context	Reusable contribution	EUDR boundary
ISSB S1	Governance, controls, risk process, ownership and decision-use.	Does not determine EUDR applicability or compliance.
ISSB S2	Climate and GHG data governance where relevant to land-use evidence.	Climate disclosure is not deforestation-free proof.
SASB / SICS	Industry and value-chain context, operational metrics and product classification.	Industry relevance is not Annex I legal scope.
GRI	Impacts, policies, stakeholder and supply-chain evidence.	Disclosure coverage is not plot-level legal evidence.
ESRS	Double-materiality, policies, actions, metrics and due-diligence context.	ESRS reporting does not replace EUDR due diligence.
TNFD	LEAP, location, nature dependencies/impacts and risk context.	TNFD assessment is not an Article 3 determination.
TISFD	Social, inequality, rights-holder and worker/community context.	Social mapping does not resolve country-of-production legality.
COSO	Control environment, risk assessment, control activities, information and monitoring.	Control maturity does not certify product compliance.
Scope 3	Value-chain identity, activity and emissions evidence.	Scope 3 inventory is not commodity/plot traceability.

Canonical context	Reusable contribution	EUDR boundary
SDGs	Impact and outcome context.	SDG contribution is not a legal defence.

12.2 Enterprise workflow

Stage	128 MME-enabled activity	EUDR extension	Controlled result
Intake	Assign task, owner, actor, time and Evidence Unit.	Role, product, event and scope candidate.	Intake state.
Origin	Route supplier, procurement and operational evidence.	Country, producer, plot, geolocation and production time.	Origin chain.
Legality	Route policy, permit, rights and control evidence.	Country-law domains and fact evidence.	Legality file.
Risk	Route risk assessment and review tasks.	Article 10 criteria, concerns and conclusion.	Risk decision.
Mitigation	Route corrective action and supplier engagement.	Article 11 action and residual risk.	Mitigation closure or hold.
Submission	Route approval and controlled output.	DDS/SD payload, mandate and identifiers.	Authorised submission record.
Continuity	Route monitoring, issue and change events.	New information, product/scope/source updates and authority interactions.	Current/superseded state.

13. Logical Control Extension Schema

The following fields are logical application controls. They may be stored in an approved extension object or protected Evidence Package. They are not new columns in the canonical 38-field Physical Interface.

Logical group	Illustrative attributes	Function
source_identity	instrument; article/annex; ELI/CELEX; version; legal_status; sha256; access_date	Authority, provenance and version lock.
actor_identity	entity_id; DUNS; official_identifier; role; SME_state; mandate_id	Role and identity binding.
product_identity	commodity; product_id; CN_HS; nomenclature_version; Annex_I_version; lot; quantity	Scope and transaction population.
origin	country; region; producer; plot_id; geolocation_id; production_period	Origin and production linkage.
geospatial	geometry; CRS; precision; source; capture_date; validation_state	Plot evidence and transformation lineage.
legality	jurisdiction; legal_domain; source; permit/right; validity; conflict_state	Country-of-production legal evidence.
risk	benchmark; criteria; concern; assessment_version; conclusion; reviewer	Risk-assessment lineage.
mitigation	issue; action; owner; evidence; residual_risk; closure	Mitigation governance.
declaration	DDS_or_SD; payload_hash; submitted_by; timestamp; reference; verification_or_declaration_id	Regulatory-output lineage.

Logical group	Illustrative attributes	Function
continuity	new_information; authority_request; reopened_at; superseded_by; retention_until	Continuing evidence and history.

13.1 Controlled null and exception states

State	Meaning
NOT-ASSESSED	Assessment has not been performed.
NOT-DETERMINED	Evidence exists but no authorised conclusion has been reached.
NOT-APPLICABLE	A reviewed decision establishes no application for the defined event and source version.
CONTEXT-ONLY	Source supports context but does not control the current decision.
EVIDENCE-GAP	Required evidence is missing, inaccessible or not linked.
CONFLICT	Sources or facts are inconsistent.
REVIEW-REQUIRED	Authorised legal, customs, geospatial or compliance review is required.
PENDING-LEGAL-EFFECT	A measure has been adopted/proposed but is not yet legally operative.
HOLD	Market or submission action is blocked pending resolution.
CURRENT	Record uses the current controlled sources and passed required review.
SUPERSEDED	A later controlled version replaces the current-use status; history is retained.
REOPENED	New information or change event requires reassessment.

14. Controlled Evidence Package and DOI Landing Page

14.1 Protected enterprise Evidence Package

Component	Minimum content
Manifest	Package id/version; entity; product population; period; creator; approver; hash.
Regulatory basis	Instrument, article/annex, legal status, effective dates and source hash.
Identity graph	Operator, suppliers, producers, representatives, products, lots, plots and transactions.
Geolocation package	Original and validated geometry, source, CRS, transformations and review state.
Legality package	Jurisdictional sources, permits/rights, fact evidence, conflicts and reviewer.
Risk package	Criteria, benchmark, sources, assessment, conclusion and authorisation.
Mitigation package	Issues, actions, responses, residual risk and closure.
Submission package	Payload, timestamp, submitting user/mandate, reference and verification/declaration identifier.

Component	Minimum content
Continuity package	New information, authority interactions, amendments, withdrawals, supersession and retention.
Limitations	Known gaps, third-party dependencies, unresolved questions and prohibited claims.

14.2 Public DOI Landing Page

The public page may disclose only provenance and status information authorised for publication: document title/version, regulatory basis, Evidence Package version, covered period, last review date, current/superseded state and high-level review status. It must not expose exact smallholder geolocation, verification numbers, personal data, supplier identities, volumes, contractual data, risk intelligence or protected legal evidence unless expressly authorised and legally permissible.

14.3 Permitted public statement

APPROVED LANGUAGE EUDR-related evidence has been structured, versioned, linked and reviewed through the EMJ.NEXUS evidence-infrastructure architecture for authorised enterprise use. This status does not constitute legal advice, certification, assurance, regulatory approval or a determination that any product complies with Regulation (EU) 2023/1115.

15. Change, Monitoring and Release Control

15.1 Change triggers

Trigger	Required action
New/amended EU legal instrument	Register source, legal effect and dates; hash official text; perform provision and data-model impact assessment.
Delegated Act exits scrutiny / enters force	Update Annex I version, product-scope rules, future-date logic and affected population.
Country benchmark changes	Version country/part classification; identify affected risk routes and reopen relevant assessments.
Guidance/FAQ update	Register as non-binding source; assess operational clarification; do not silently rewrite legal conclusions.
Information System/API change	Version schema, roles, validation, endpoint and error handling; execute integration test.
Supplier/plot/product change	Revalidate identity, geometry, lineage, legality and risk.
New substantiated concern	Reopen affected product population; notify and mitigate under authorised process.
Authority request or decision	Preserve request, evidence response, deadline, restriction and outcome.
Evidence expiry/conflict	Mark stale/conflicted; prevent use where decision-critical; escalate.

15.2 Release gates

- Official source identity, legal status, effective dates and locator verified.
- Pending and non-binding sources visibly distinguished from operative law.
- Role, scope, product, plot and transaction population defined.
- Every decision-critical Evidence Unit has provenance, time, owner and relationship.
- Geolocation validation and original-data preservation completed.
- Legality domains and unresolved rights or permit issues identified.
- Risk and mitigation conclusions authorised by the responsible actor.
- Submission identifiers protected and linked to immutable payload history.

- No canonical MME, tier, scoring, assurance or claims field altered.
- No EU, Commission, competent-authority, customs, certification or verifier endorsement implied.

16. Implementation Decision and Release Plan

Priority	Implementation	Acceptance condition
P0	Register the complete regulatory baseline; establish actor, scope, product, plot, geolocation and declaration objects.	No EUDR use case proceeds without a controlled source version and identified responsible actor.
P0	Implement role and product-scope gates, including PENDING-LEGAL-EFFECT for the July 2026 Delegated Act.	No pending scope amendment is represented as operative law.
P0	Implement plot/geolocation validation, original-versus-working geometry and product/lot linkage.	Every in-scope quantity is linked to all contributing plots or placed on HOLD.
P1	Implement legality, risk assessment, mitigation and authorised conclusion records.	The conclusion is reproducible from evidence, criteria, reviewer and decision.
P1	Implement Information System payload/version/identifier controls and API test environment.	Submission history is immutable and reconciled to official responses.
P1	Generate protected EUDR Evidence Package and limited DOI status record.	Protected data is not exposed publicly; package manifest is hashable and reproducible.
P2	Implement monitoring triggers for source, benchmark, product, supplier, plot and substantiated-concern changes.	Affected assessments reopen without deleting historical states.
P2	Run commodity-specific POCs for at least one simple chain and one mixed/composite chain.	End-to-end traceability and exception handling pass governance review.

FINAL ARCHITECTURE DECISION EUDR is governed as a version-controlled External Regulatory Reference Layer and enterprise application use case. It is not added as a tenth core framework and does not require reconstruction of the canonical 128 MME Mapping.

Appendix A. Requirement-to-Evidence Crosswalk

EUDR reference	Requirement / object	Controlled evidence	EMJ.NEXUS function	Boundary
Art. 3	Three conditions for market/export	Product, deforestation-free, legality and declaration evidence	Associate upstream evidence with authorised output.	No compliance determination.
Arts. 4–5	Operator/downstream/trader duties	Role, counterparty, identifiers, new information and assistance	Role gate, transaction lineage and issue workflow.	No transfer of statutory duty.
Art. 4a / Annex III	Simplified declaration	Actor-size, primary-production, low-risk and plot evidence	Eligibility evidence and declaration versioning.	No automatic eligibility.
Art. 6	Authorised representative	Mandate and submission activity	Authority and identity binding.	Representative authority limited to mandate.
Arts. 8–9	Due diligence / information	Product, quantity, origin, plots, production time and legality	Completeness, provenance and relationship controls.	Collection is not conclusion.

EUDR reference	Requirement / object	Controlled evidence	EMJ.NEXUS function	Boundary
Art. 10	Risk assessment	Criteria, benchmark, sources, concerns and finding	Assessment lineage and review.	No automated negligible-risk verdict.
Art. 11	Risk mitigation	Actions, evidence requests, audits, exclusions and residual risk	Action tracking and closure authority.	No substitute for operator judgment.
Art. 12	Due-diligence system / reporting	Policies, controls, annual review and report evidence	Governance and version control.	No assurance opinion.
Art. 13	Simplified due diligence	Low-risk status and absence/presence of contrary information	Conditional route and reopen trigger.	Low risk is not zero risk.
Arts. 16–24	Checks, measures and remedies	Authority requests, holds, responses and outcomes	Case file and deadline control.	Authorities retain enforcement power.
Art. 29	Country benchmarking	Classification, source version and effective date	Versioned external parameter.	No local reclassification.
Art. 31	Retention	Records and evidence for required period	Retention policy and legal hold.	No premature deletion.
Art. 33	Information System	Payloads, actors, identifiers and status	Integration and audit trail.	EU system remains authoritative.
Art. 38	Application dates	Actor category and transition evidence	Temporal applicability gate.	No assumed deferral.

Appendix B. Minimum EUDR Evidence Record

Domain	Required record
Control	record_id; version; status; created_at; updated_at; owner; reviewer
Source	source_id; instrument; provision; legal_status; effective_from/to; url; hash; access_date
Actor	entity_id; official_id; DUNS where used; role; SME_state; establishment; mandate
Product	commodity; product_id; CN/HS; nomenclature; Annex version; lot; quantity; unit
Transaction	event_type; event_date; shipment/customs reference; supplier; customer; market
Origin	country/part; producer; plot_ids; production date/range
Geolocation	geometry; CRS; original file; validated file; method; precision; transformation
Legality	legal domains; laws; permits/rights; evidence; validity; conflict status
Risk	benchmark; criteria; sources; substantiated concerns; assessment; conclusion; approval
Mitigation	risk issue; action; request; response; audit; exclusion; residual risk; closure
Declaration	type; payload version/hash; submitter; mandate; timestamp; reference; verification/declaration id

Domain	Required record
Continuity	new information; authority case; reopened; amended; withdrawn; superseded_by; retention

Appendix C. Evidence Conflict and Escalation Protocol

- 13. Detect and register the conflict without overwriting either source.
- 14. Identify every product, plot, lot, transaction, assessment and declaration dependent on the disputed evidence.
- 15. Classify materiality: informational, decision-relevant, submission-relevant or market-access critical.
- 16. Place affected decisions on REVIEW-REQUIRED or HOLD where the conflict could affect Article 3, risk or submission accuracy.
- 17. Request additional evidence from the responsible supplier or source owner with a controlled deadline.
- 18. Route legal, geospatial, customs, rights-holder or compliance issues to an appropriately authorised reviewer.
- 19. Record resolution rationale, residual uncertainty and authorised decision.
- 20. Issue a new Evidence Package version; mark the previous current-use state SUPERSEDED while preserving history.
- 21. Notify competent authorities and downstream actors where the legally responsible actor determines notification is required.
- 22. Close only when affected records, communications and retention requirements are reconciled.

Appendix D. Cryptographic Source Manifest

This v1.0 publication registers authoritative locators and source status. Byte-level hashes must be inserted after the official source files are acquired through the controlled publication workflow. A locator alone is not a byte lock.

Source ID	Official locator	Byte-lock state
EU-EUDR-BASE-2023-1115	http://data.europa.eu/eli/reg/2023/1115/oj	ACQUISITION / HASH REQUIRED
EU-EUDR-CONSOL-2025-12-26	https://eur-lex.europa.eu/eli/reg/2023/1115/2025-12-26/eng	ACQUISITION / HASH REQUIRED
EU-EUDR-AMEND-2024-3234	http://data.europa.eu/eli/reg/2024/3234/oj	ACQUISITION / HASH REQUIRED
EU-EUDR-AMEND-2025-2650	http://data.europa.eu/eli/reg/2025/2650/oj	ACQUISITION / HASH REQUIRED
EU-EUDR-BENCH-2025-1093	http://data.europa.eu/eli/reg_impl/2025/1093/oj	ACQUISITION / HASH REQUIRED
EU-EUDR-IS-2024-3084	http://data.europa.eu/eli/reg_impl/2024/3084/oj	HISTORICAL / HASH REQUIRED
EU-EUDR-IS-2026-1565	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32026R1565	ACQUISITION / HASH REQUIRED
EU-EUDR-GUIDE-2026-3896	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202603896	NON-BINDING / HASH REQUIRED
EU-EUDR-FAQ-V5	https://environment.ec.europa.eu/publications/faq-eudr-implementation_en	NON-BINDING / HASH REQUIRED
EU-EUDR-REPORT-2026-191	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52026DC0191	REPORT / HASH REQUIRED
EU-EUDR-DA-SCOPE-2026-07	https://environment.ec.europa.eu/publications/delegated-act-product-scope-eu-deforestation-regulation_en	PENDING LEGAL EFFECT / HASH REQUIRED

Appendix E. Standard Insertion and Citation Language

E.1 Core-document reference

APPROVED LANGUAGE EUDR regulatory materials are controlled through EMJ.LIFE EU Deforestation Regulation Product Origin, Geolocation and Due Diligence Evidence Governance External Supplement Appendix v1.0 (EMJ-EXT-

EU-EUDR-2026-APPX). They support evidence readiness, source provenance, product-origin and geolocation linkage, legality evidence, risk and mitigation lineage, authorised submission records and continuing-evidence governance. They do not amend the canonical EMJ.NEXUS architecture or determine legal compliance.

E.2 Task-note language

APPROVED LANGUAGE EUDR content, if used, is recorded as an external regulatory use case linked to the relevant canonical task and Evidence Unit. Canonical framework routing, points, value factors, weights, RCF, MCP, AEU, NTCC, Evidence Tier, assurance and claims conclusions remain unchanged.

E.3 Disclaimer

APPROVED LANGUAGE This supplement does not replace Regulation (EU) 2023/1115, applicable amending or implementing acts, the EUDR Information System, customs or competent authorities, or professional legal and technical advice. Inclusion within EMJ.NEXUS does not imply endorsement, certification, approval or recognition by the European Commission or any EU institution.

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