

EUDR Import Readiness & Operations Report

A fictional tyre-importer example of the written output from the EUR 1,000 diagnostic.

Client scenario	Review basis
Example Tyre Importer EU BV Fictional Netherlands entity	One representative purchasing/import flow Evidence cut-off: 4 October 2026
Five product/SKU families Two manufacturer chains	Report reference: MP-ILL-2026-01 Version 1.0 / 4 October 2026

This is not a self-assessment.

The diagnostic examines records and the relationships between them. It gives management a bounded evidence inventory, traceability assessment, blockers and an action plan. It does not issue a compliance certificate or a market-release decision.

Illustrative example - not a customer case study

Every company, product, shipment, batch, evidence identifier and finding in this report is invented. No actual supplier records, farm coordinates or customer outcomes are represented. Omitted fields are deliberately marked, not recovered from a real customer report.

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Management decision brief

The useful conclusion is what management can act on, including where the present evidence stops.

Finding	Management implication
Representative flow cannot yet support a complete evidence review	The manufacturer has supplied a plot set, but has not linked it to the selected output batch. Do not treat receipt of coordinates as closure.
Chain A has a practical evidence owner; Chain B has only a general declaration	Run a bounded reconciliation request for Chain A. Establish an upstream owner and sample pack for Chain B before assuming recurring support is feasible.
Commercial identifiers are usable; source version history is incomplete	Preserve the received originals and establish a versioned evidence register before further reviews.

Three proposed management actions

- 1. Assign ownership.** Procurement owns supplier access; operations owns shipment and batch references; the designated operator reviewer owns risk conclusions and placement decisions.
- 2. Resolve the principal blocker.** Ask Manufacturer A to reconcile batch B-A17 to input lots, sourcing set and plot-file version. Accept a documented explanation only after review of its supporting records.
- 3. Keep the service decision conditional.** A recurring proposal should follow a successful evidence retrieval test. Do not buy a platform on the assumption that upstream evidence will appear later.

Readiness is not a score

Status in this report describes the work: received, relationship supported, unresolved, or not reviewed. A missing legal-risk review is not converted into a green result by counting uploaded documents. No negligible-risk conclusion is reached in this fictional diagnostic.

Scope, boundaries & assumptions

A fixed engagement boundary makes the report useful without implying an audit of the entire business.

Included scope	Selected example
Legal entity	1: Example Tyre Importer EU BV
Product/SKU families	Up to 5: passenger summer, passenger all-season, van, light truck and heavy truck new pneumatic tyres
Representative flow	1: purchasing order PO-EX41 / shipment SH-EX41
Manufacturer/supplier chains	Up to 2: Manufacturer A / Processor A; Manufacturer B / Processor B
Output	Evidence inventory; traceability/geolocation assessment; blockers; remediation plan with owners/actions; management readout; written report

Assumptions requiring confirmation in a real engagement

The importer is assumed to be the EU operator for its direct imports. Customs classification and the presence of Hevea brasiliensis natural rubber require product-specific confirmation. The example does not establish an entity-size classification or entitlement to a delayed application date.

Outside this diagnostic

No site audit, laboratory composition test, farm survey, production-legality determination, satellite investigation, customs ruling, completed DDS or unlimited supplier follow-up is included. Confidentiality arrangements and delivery timing are agreed separately. An unavailable original record cannot be created through a diagnostic.

The second chain is reviewed for cooperation and available evidence within the same representative purchasing-flow context. It is not a second full shipment review. Findings cannot be extrapolated to all stock, every SKU or future sourcing.

Product scope & role register

Regulatory classification comes before designing the document request.

Question	Example record / open action
Are the goods listed?	New pneumatic tyres: assess ex 4011 and its described subset against the actual goods and current Annex I. CN classification assumed, not independently determined.
What rubber is present?	Specification asserts a natural/synthetic blend. Confirm the relevant natural rubber is Hevea brasiliensis and obtain the applicable specification version.
Who is the actor?	Direct EU importer assumed operator. Do not copy the duties of a downstream operator or trader into this role.
Which application date?	Most substantive obligations: 30 December 2026. Eligible micro/small/natural-person operators may qualify for 30 June 2027 under Article 38(3); confirm establishment by 31 December 2024 and the product conditions.
Do 2026 additions give tyres a 2027 date?	No blanket inference: the 30 December 2027 date concerns newly added products. The ex 4011 new-tyre entry was already listed.

September 2026 Annex I changes

Delegated Regulation (EU) 2026/2102 narrows the former 4012 entry to ex 4012 90 30 tyre treads and deletes the former 4010 and 4016 entries. Rubber coverage is limited to Hevea brasiliensis. This is not a claim that all tyres or all rubber articles are covered.

Sources: Regulation (EU) 2023/1115, Annex I; Regulation (EU) 2025/2650, amended Articles 2, 4, 5 and 38; Delegated Regulation (EU) 2026/2102, Annex. Linked reference list: page 12.

Representative product flow

Read the chain backwards from the goods being imported. A commercial relationship is not automatically a material relationship.

Link	Evidence state in the fictional flow
SH-EX41 -> SKU families	Invoice INV-EX41 and packing list PL-EX41 identify quantity and product references. Received; identifiers internally consistent in the example.
SKU -> manufacturer batch B-A17	Packing list has a production reference; batch manifest confirms the selected family. Relationship supported for the example, not all families.
B-A17 -> natural-rubber lots NR-11 / NR-12	Production allocation record requested. No batch-specific reconciliation received. Principal blocker F-01.
Input lot -> Processor A / sourcing set SS-07	Processor dispatch record received for NR-11 only. NR-12 remains unresolved.
SS-07 -> plot set PS-07 v1	Plot file received without a clear covered period or sourcing-set reconciliation. Link unresolved.
Plot set -> supporting evidence	Production-legality and deforestation evidence not reviewed in this example. No risk conclusion available.

What the picture means

The invoice supports the goods-to-product relationship. It does not establish the origin of the natural rubber. The supplied plot file supports only the assertion that a set of locations exists. The missing middle links prevent using it as shipment-specific evidence.

For Chain B, the direct supplier is a distributor. Its invoice names Manufacturer B but does not grant access to processor or origin records. Procurement must establish the route to the evidence owner before the operating model is extended.

Evidence inventory

Each record needs a source, a coverage statement and a retrievable version. These entries are fictional.

ID / source	Coverage / status	Limit / next action
E-01 v1 / importer INV-EX41 + PL-EX41	SH-EX41 / received	Confirm line-to-SKU mapping for all five families.
E-02 v1 / Manufacturer A Batch manifest	B-A17 / relationship supported	Does not identify natural-rubber input allocation.
E-03 v1 / Manufacturer A Material specification	Passenger family / received	Hevea species and current production applicability require confirmation.
E-04 v1 / Processor A Dispatch record	NR-11 / received	No receipt/allocation record tying NR-11 to B-A17.
E-05 v1 / Manufacturer A PS-07 plot file	Claimed origin set / unresolved	No covered period or batch-linked sourcing-set explanation. Coordinates omitted from illustrative report.
E-06 v1 / distributor Supplier declaration	General statement / received	No product, lot, period or origin relationship demonstrated.
E-07 / not supplied Legality and land-use records	Not reviewed	Request relevant records and define specialist review requirements.

Inventory convention

Received means the record was supplied, not that its assertions have been verified. Relationship supported describes a narrow link, not compliance. Source files remain unchanged; derived summaries and transformations have separate identifiers.

Traceability & mixed inputs

Mixed natural-rubber sourcing requires a bounded origin universe and an explanation of the allocation controls.

Finding F-01: output batch is not reconciled to inputs

Manufacturer A names two natural-rubber lots but provides no production consumption or controlled allocation record. Without that link, it is unclear whether PS-07 covers every relevant input to the imported output. A supplier-wide plot catalogue is not a substitute.

Test requested	Acceptance evidence to review
Define the production boundary	Batch identifier, production period, relevant output and material-allocation method; explain any pooled process.
Reconcile relevant input lots	Intake, consumption/allocation, stock carry-over and exceptions sufficient to explain which lots may contribute. Quantities are a control, not origin proof on their own.
Bound the origin set	For every contributing relevant lot, relate processor/sourcing-set references to production plots and periods. Explain additions, exclusions and unresolved mixing.
Explain uncertainty	If records cannot distinguish candidate inputs, disclose the full candidate set and the limits. Never replace unknown origin with one convenient farm.

Finding F-02: Chain B has no demonstrated upstream access

The distributor offers a declaration covering its catalogue. No technical owner, origin pack or escalation contact is identified. Proposed action: request a small representative pack through the manufacturer and agree restricted-access arrangements where justified.

The EUDR assessment considers complexity, circumvention and mixing risks under Article 10. A private certification or mass-balance label does not itself demonstrate the product-to-origin relationship or transfer the operator decision.

Geolocation assessment

Valid geometry and valid product linkage are different review gates.

Gate	Example result / limitation
File and identifiers	PS-07 v1 is received. Stable plot identifiers are present in the fictional inventory. No actual coordinate file is included or technically validated here.
Geometry requirements	In a real review: coordinate precision, latitude/longitude order, missing or duplicated IDs, polygon validity and area-dependent geometry requirements are checked.
Production coverage	Covered production period and relation to sourcing set SS-07 are not stated. Request both before extending the file to B-A17.
Substantive review	Production legality and deforestation-free status are not inferred from file validity. Define source reliability and land-use review work separately.

The legal geometry rule

Article 2(28) defines geolocation using at least six decimal digits. For non-cattle production plots larger than four hectares, polygons are required. An exactly four-hectare plot should not be silently treated as larger than four hectares. Technical format guidance supports submission; it does not supply missing origin relationships.

Finding F-03: scope and period are missing

Request a signed or otherwise attributable explanation identifying which sourcing set and production period PS-07 covers, the relevant plot identifiers and the records supporting that statement. Ask for the origin of the file, not only a re-export in a different format.

What is deliberately absent

This illustrative report contains no invented coordinates that might be mistaken for real production evidence, and no satellite image purporting to prove a fictional farm is deforestation-free. A real diagnostic reports the checks actually performed and unresolved specialist work.

Blockers & remediation plan

Priority describes operational consequence, not an automated regulatory score. Relative timings are illustrative, not a service promise.

Finding / priority	Owner & action	Closure evidence
F-01 / critical Batch-to-input gap	Operations + Manufacturer A technical owner Request B-A17 reconciliation; target: next 10 working days.	Attributable input allocation and sourcing-set links reviewed for the selected flow.
F-02 / high Chain B cooperation	Procurement Name manufacturer evidence owner and agree access; target: next 5 working days.	Representative pack and a workable follow-up route.
F-03 / high Plot coverage unclear	Manufacturer A origin owner Explain period, plot IDs and SS-07 relationship.	Coverage statement supported by traceability records.
F-04 / high Legal/risk review not done	Designated operator reviewer Define evidence and specialist review needed.	Recorded assessment of required information, risks and mitigation; no positive conclusion presumed.
F-05 / medium Versions can be overwritten	Evidence coordinator Freeze originals; open version and change register.	Retrieval test reproduces E-05 v1 and the review history.
F-06 / high Deadline/role assumed	Importer management + adviser Confirm entity status, role and Article 38 conditions.	Written scope/role/date rationale with supporting entity records.

An action is not closed merely because a reply arrives. Record the reviewer, evidence version, affected flow and rationale for accepting or rejecting the response. Escalate silent or inconclusive replies instead of converting them into readiness.

Repeated shipments & change control

A reusable supplier file needs a defined coverage boundary. It is not an unlimited approval for subsequent imports.

Trigger	Operational response
New output batch / production period	Check whether existing input allocation and origin evidence cover it; obtain the new batch-to-input relationship where required.
New processor, input lot or sourcing pool	Reopen origin coverage and mixing questions. Identify affected pending and previous flows.
PS-07 v2 replaces v1	Preserve both versions. Record whether coordinates were corrected, plots added/removed or coverage changed. Do not silently rewrite earlier decisions.
Contradiction or substantiated concern	Route to the responsible operator reviewer promptly. Assess consequences and applicable notification/action duties.
Same SKU, same supplier	Review changes; identical commercial labels do not establish identical material inputs.

Suggested control record

Change CH-EX02: PS-07 v2 adds two plot identifiers. Evidence coordinator records receipt and source; manufacturer explains the reason and affected production periods; reviewer identifies which shipment assessments need reopening. v1 remains retrievable with the earlier record.

Decision and statement references

Record the entity, role, assessed product flow, exact evidence versions and applicable DDS or declaration reference. An operator workflow can require due diligence and a DDS; amended downstream/trader obligations differ. Do not assume every repeat shipment means either a new DDS or no further review.

Relevant due-diligence and Article 5 information records have at least five-year retention duties under the applicable provisions. Map the record category and legal trigger rather than using one blanket deletion date for all files or enquiries.

Operating model & management readout

The proposed model is conditional on resolving the evidence dependencies. It is not a recommendation to proceed with placement.

Activity	Responsible role / practical output
Supplier access and commercial escalation	Importer procurement / named contacts, access agreement, outstanding requests
Flow and allocation records	Importer operations + manufacturer technical owner / batch and input reconciliation
Evidence maintenance	MarketPass, if separately engaged / inventory, originals, versions, request log and unresolved actions
Risk conclusion and placement decision	Designated operator reviewer / reasoned assessment and approval or escalation
DDS hand-off where applicable	Operator or explicitly mandated EU-established authorised representative / agreed submission route and reference record

Suggested readout agenda

- 5 minutes:** scope, assumptions and role/date confirmation.
- 10 minutes:** reconstruct SH-EX41 and identify where the evidence route stops.
- 10 minutes:** agree owners, closure criteria and escalation dates for F-01 to F-06.
- 5 minutes:** decide whether to resolve internally, use targeted support or request a separately scoped managed-service proposal.

Diagnostic recommendation

Resolve the batch-to-input link and upstream access first. Introduce a simple versioned ledger immediately. Scope recurring support only after the manufacturer can demonstrate a repeatable evidence response. Platform selection can then reflect the actual record volume and controls.

MarketPass by Encode supplies managed operational support. ENCODE INFO - FZCO is established in Dubai; this report does not appoint it as an EU authorised representative. Article 6 requires an EU-established representative and written mandate; operator responsibility remains with the operator.

Sources, method & limitations

Regulatory references reviewed against official sources on 4 October 2026. Links are clickable; the applicable legal text governs.

Regulation (EU) 2023/1115

Articles 2, 3, 4, 6, 9-13 and Annex I; read with the amendments.

Regulation (EU) 2025/2650

Amended roles, downstream/trader duties, primary-operator provisions and Article 38 dates.

Delegated Regulation (EU) 2026/2102

Rubber species restriction, revised Annex I and newly added-product timing.

Commission guidance, C/2026/3896

20 July 2026 guidance; does not replace binding law.

Commission EUDR overview

Current application timetable and implementation context.

Method and evidential limits

The real diagnostic reviews the agreed available records, maps their relationships and records untested assumptions, absent evidence and work needing specialist input. This fictional example demonstrates that structure; no supplier interview, document authentication, geometry validation, land-use assessment or compliance determination actually occurred.

The illustrative findings, priorities, owners and timings are invented. A real report varies with the chain and evidence. EUR 1,000 covers the defined diagnostic; taxes, access arrangements and timing are confirmed before acceptance. Recurring services are quoted separately.

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