

# GS1 European Union Deforestation Regulation Standard

EUDR requirements for trading partner transparency for EUDR implementation

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# Contributors

First Name	Last Name	Organisation
Raquel	Abrantes	GS1 Portugal
Mirva	Alatyppö	GS1 Finland
Dace	Andersmite	GS1 Latvia
Jonas	Andersson	Ikea
Anette	Andersson	ICA Sverige AB
Fredrik	Andersson	CILAB/COOP Sverige AB
Alejandra	Anzola	GS1 Colombia
Robine	Arnoys	GS1 Belgium & Luxembourg
Andrea	Ausili	GS1 Italy
Mahmoud	Badreldin	Movilizer GmbH - A Honeywell Company
Gabriela	Barriga	ALCAMPO, S.A.
Kai	Barz	Edeka Zentrale AG & Co. KG
Giulia	Basclet	Fédération du Commerce et de la Distribution (FCD)
Jonas	Batt	GS1 Switzerland
Nicolas	Becker	European EPC Competence Center GmbH (EECC)
Dieter	Beitz	CSB-System SE
Salima	Bekraoui	GS1 Italy
Dana	Benson	GS1 US
Rebecca	Berendt	GS1 New Zealand
Laura Merce	Bermudez	GS1 UK
Sven	Böckelmann	Benelog GmbH & Co. KG
Florent	Bouguin	Optel Group
Rob	Bouwels	GS1 Netherlands
Matthias	Bug	GS1 Germany
Elena	Campdelacreu	GS1 Spain
Peter	Carter	GS1 Australia



First Name	Last Name	Organisation
Emanuela	Casalini	GS1 Italy
Matic	Ceglar	GS1 Slovenia
Madalina	Cernat	GS1 Romania
Alessandro	Chelli	Trusty S.r.l. Società Benefit, Co-chair
Francesca	Chiovenda	GS1 Global Office
Marjolein	Christiaanse	GS1 Netherlands
Flavia	Costa	GS1 Brasil
Deirdre	Courtney	GS1 Global Office
Fredrika	Dannqvist	Arvid Nordquist HAB
Dennis	De Cat	GS1 Belgium & Luxembourg
Guillaume	Dejaille	EQUADIS SA
Nicolas	Delabrouille	Mars PF France
Wouter	Dessein	COLRUYT GROUP NV, Co-chair
Peta	Ding	GS1 Global Office
Lieven	Driessens	COLRUYT GROUP NV
Marcel	Ducceschi	GS1 Switzerland
Ngoc	Duong	GS1 Vietnam
Nordine	Eddaoudi	GS1 France
Simon	Eicher	GS1 France, Co-chair
Valérie	Fabri	Delhaize Group
Bernard	Faibella	GS1 Global Office, Subject Matter Expert
Clemence	Faucon	Tilkal
Nick	Fazio	Tilkal
Chuistian	Fernandez	Amazon Germany
Christian		
Janine	Föhn	Emmi Schweiz AG
	Föhn Font	Emmi Schweiz AG GS1 Spain
Janine		
Janine Oleguer	Font	GS1 Spain
Janine Oleguer Marc	Font Gale	GS1 Spain GS1 Global Office
Janine Oleguer Marc MeiLing	Font Gale Gao	GS1 Spain GS1 Global Office GS1 China
Janine Oleguer Marc MeiLing Stefan	Font Gale Gao Gathmann	GS1 Spain GS1 Global Office GS1 China GS1 Ireland
Janine Oleguer Marc MeiLing Stefan Eleanor	Font Gale Gao Gathmann Gayle	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa	Font Gale Gao Gathmann Gayle Giulieri	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole	Font Gale Gao Gathmann Gayle Giulieri Golestani	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole Robin	Font Gale Gao Gathmann Gayle Giulieri Golestani Goossens	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada GS1 Belgium & Luxembourg
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole Robin Nadi (Scott)	Font Gale Gao Gathmann Gayle Giulieri Golestani Goossens Gray	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada GS1 Belgium & Luxembourg GS1 Global Office
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole Robin Nadi (Scott) János	Font Gale Gao Gathmann Gayle Giulieri Golestani Goossens Gray Gyuris	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada GS1 Belgium & Luxembourg GS1 Global Office GS1 Hungary
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole Robin Nadi (Scott) János Kai	Font Gale Gao Gathmann Gayle Giulieri Golestani Goossens Gray Gyuris Hachmann	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada GS1 Belgium & Luxembourg GS1 Global Office GS1 Hungary Edeka Zentrale AG & Co. KG
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole Robin Nadi (Scott) János Kai Dominik	Font Gale Gao Gathmann Gayle Giulieri Golestani Goossens Gray Gyuris Hachmann Halbeisen	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada GS1 Belgium & Luxembourg GS1 Global Office GS1 Hungary Edeka Zentrale AG & Co. KG
Janine Oleguer Marc MeiLing Stefan Eleanor Vanessa Nicole Robin Nadi (Scott) János Kai Dominik Mark	Font Gale Gao Gathmann Gayle Giulieri Golestani Goossens Gray Gyuris Hachmann Halbeisen Harrison	GS1 Spain GS1 Global Office GS1 China GS1 Ireland GS1 Ireland GS1 Global Office GS1 Italy GS1 Canada GS1 Belgium & Luxembourg GS1 Global Office GS1 Hungary Edeka Zentrale AG & Co. KG GS1 Switzerland Milecastle Media Limited, Subject Matter Expert



First Name	Last Name	Organisation
Jana	Herrmann	Nestlé
David	Heulle	REWE Group
Frank	Hogema	GS1 Netherlands
Pia	Högström	GS1 Finland
On Pui	Hong	GS1 Hong Kong, China
Sharon Yun-San	Hsieh	GS1 Chinese Taipei
Matthieu	Hug	Tilkal
Yoshihiko	Iwasaki	GS1 Japan
Caroline	James	GS1 New Zealand
Han	Jie	GS1 China
Patrik	Jonasson	GS1 Global Office
Jonas	Jonsson	NorDan AB
Peter	Jönsson	GS1 Sweden
Nora	Kaci	GS1 Global Office
Iliada	Karali	GS1 Association Greece
Kimberly	Karambis	Arvato Systems GmbH
Katalin	Kecskés	GS1 Hungary
Kimmo	Keravuori	GS1 Finland
Sabine	Klaeser	GS1 Germany
Urban	Konda	GS1 Slovenia
Helene	Kraft	GS1 Sweden
Anne-Claire	Krid	GS1 France
Frank	Kuhlmann	GS1 Germany
Tomas	Langlais-Roy	Optel Group
To Nhu	Le	GS1 Vietnam
Frederic	Le Breton	Ferrero Commerciale Italia
Dirk	Leemans	COLRUYT GROUP NV
Eric	Lequenne	Kezzler AS
Piergiorgio	Licciardello	GS1 Global Office, lead editor
Ildikó	Lieber COE	GS1 in Europe
Jonathan	Ling	TrackVision
Carina	Lins	GS1 Brasil
Nicolas	Liou	GS1 Chinese Taipei
Chris	Liu	GS1 Global Office
Aurore	Lubrano	GS1 Global Office
Wayne	Luk	GS1 Hong Kong, China
Fumi	Maekawa	GS1 Japan
Pierre	Mauger	Optel Group
Edward C	Merrill	GS1 Global Office
Holly	Mitchell	Seagull Scientific
Alice	Mukaru	GS1 Sweden



First Name	Last Name	Organisation
Nirusa	Naguleswaran	GS1 Germany
Sophie	Nicolas	GS1 UK
Staffan	Olsson	GS1 Sweden
Sara	Ongaro	Renoon
Chensheng	Pan	GS1 China
Nicolas	Pauvre	GS1 France
John	Pearce	Axicon
Roberto	Perez-Franco	GS1 Australia
Sarina	Pielaat	GS1 Netherlands
Etienne	POT	GS1 in Europe
Quentin	Regan	GS1 UK
Craig Alan	Repec	GS1 Global Office, Subject Matter Expert
Joana	Rodrigues	Salsify
Miguel	Rodrigues	GS1 UK
Sylvia	Rubio Alegren	ICA Sverige AB
Bonnie	Ryan	GS1 Australia
Claudia	Sandell-Gándara	Wholechain
James	Sandland	GS1 Canada
Roxana	Saravia Bulmini	GS1 Argentina
Yuki	Sato	GS1 Japan
Sue	Schmid	GS1 Australia
Tom Eric	Schmidt	August Storck KG
Stephan	Schuler	Emmi Schweiz AG
Eugen	Sehorz	GS1 Austria
Renata	Sileika	GS1 Lithuania
Matija	Šimunić	GS1 Croatia
Tom	Sinoy	COLRUYT GROUP NV
Joakim	Skimutis	Foodchain by Blockchain
Grzegorz	Sokolowski	GS1 Poland
Peter	Stevens	GS1 New Zealand
Hana	Strahlová	GS1 Czech Republic
Roman	Strand	GS1 Germany
Hugo	Stuurman	JDE Peets
Maria	Svejdar	GS1 Ireland
Bernadett	Szeiler	GS1 Hungary
Diane	Taillard	GS1 Global Office
Henk-Jan	Timmerman	GS1 in Europe
Tomas	Tluchor	GS1 Czech Republic
Ralph	Troeger	GS1 Germany
Alec	Tubridy	GS1 Australia
Lev	Turner	GS1 Global Office



First Name	Last Name	Organisation
Lyubomir	Valchev	Coca-Cola European Partners
Arthur	Van crombrugge	Delhaize Group
Marcel	van den Berg	Koninklijke Ahold Delhaize N.V.
Wim	Van Edom	GS1 Belgium & Luxembourg
Krisztina	Vatai	GS1 Hungary
Linda	Vezzani	GS1 Italy
Micol	Vialetto	GS1 Italy
Adriana	Wolkowicz	Nestle Polska S.A.
Elizabeth	Waldorf	TraceLink, Co-chair
Jason	Walsh	IKEA Supply Services (Sweden) AB
Karolin	Weise	Salsify
Friso	Wempe	GS1 Netherlands
Tasha	Wiehe	GS1 Global Office, Standards Development Lead
Ruoyun	Yan	GS1 China
Belle	Yang	GS1 Chinese Taipei
Crystal	Yap	GS1 Malaysia
Nuala	Yelland	Mondelez International
Xie	Yi	GS1 China
Christian	Zaeske	METRO Group
Dejan	Zivkovic	Mondelez International

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# 1 Introduction

Regulatory requirements have become a key driver in enhancing transparency related to sustainability, and stricter rules on sustainability reporting have created an urgent need for accurate and verifiable data about company operations. The European Union (EU) is leading the way with a number of regulatory initiatives, spearheaded by the European Green Deal. The European Union Deforestation Regulation, 2023/1115, is one of these initiatives, aiming to limit the impact of EU trade on global deforestation and promoting the consumption of "deforestation-free" products.

The scope of the regulation impacts seven commodities and the derived product:

Wood: Includes timber products

Rubber: Includes natural rubber products

**Palm oil**: Includes palm nuts and palm oil derivatives **Soy**: Includes soybeans and soy-bean flour and oil

Cattle: Includes beef and leather

Cocoa: Includes chocolate

Coffee: Includes roasted coffee beans

Depending on the role in the supply chain and their size the economic operators will have to be compliant with some specific requirements and perform verification and assessment activities to attest that the products they are introducing in the market or trading are, effectively, "deforestation-free", have been produced in accordance with local legislation and are covered by a due diligence statement.

One important obligation for operators introducing a product in the market, and non-SME traders is the submission of **a Due Diligence Statement (DDS)**, including a set of data specified in the Annex II, on a centralised system, a dedicated module on the **Trade Control and Expert System (Traces)**, developed by the European Commission.

When a Due Diligence Statement is submitted and accepted, the Traces system returns two numbers: the **Reference Number** and the **Verification Number**.

These two numbers are the keys to verify the existence of a valid Due Diligence Statement and have access to the data contained into it.

The two numbers are also needed, when submitting a DDS, to include a reference to previously submitted diligence statements by upstream parties. An example is a non-SME retailer submitting a DDS for a traded product, referencing the DDS submitted by the supplier. Consequently, the two numbers must be, then, shared with downstream supply chain partners to make possible, for them, to fulfil their specific requirements.

This standard will provide guidance on how to leverage GS1 Data Sharing standards to share the DDS numbers, as well as other context data important to allow a correct processing of them.

It will also support multiple level of granularity, enabling trading partners to share the data at batch or serial level as well as at product level, if compatible with the specific process.

The technical solution will support the GS1 identification keys like: GTIN for product identification, GLN for parties and location identification and SSCC for logistic units identification.



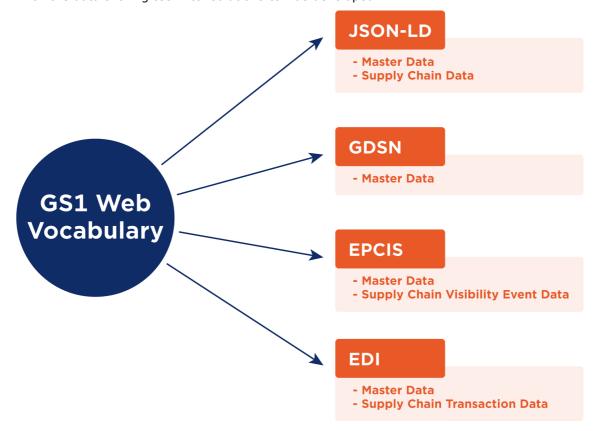
# 2 GS1 Data Sharing ecosystem

GS1 provides several data sharing solutions, mapping different steps in the supply chain and supporting different operators.

The development of GS1 data sharing standards to facilitate regulatory compliance depends on a common semantic model and core business rules.

This semantic anchor, in the GS1 ecosystem, is the GS1 Web Vocabulary.

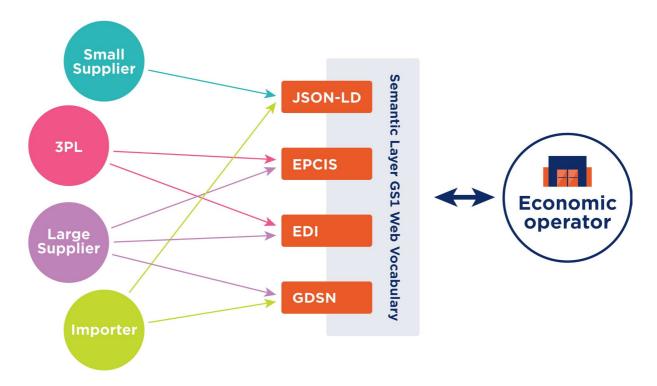
The data model defined in GS1 Web Vocabulary is, conceptually, "syntax neutral", meaning that it is not designed to support specifically a particular technology but provides the semantic layer on top of which the data sharing technical solutions can be developed.



The GS1 Web Vocabulary layer plays a key role in enabling interoperability across diverse data-sharing solutions. By providing a common semantic framework, it allows operators in the supply chain to connect with partners through multiple coherent solutions, making it easier to achieve critical mass and broader adoption. While some technical standards may only support part of the GS1 Web Vocabulary data model—depending on their specific capabilities or the level of granularity required—this does not limit its overall value. Even partial adoption delivers significant alignment and consistency, helping different systems "speak the same language" and ensuring smoother collaboration across the supply chain.

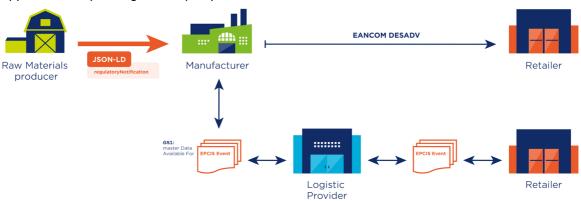
An example of application scenario for EUDR regulation is represented in the figure below:





An economic operator will be able to support multiple interfaces, all consistent with the semantic anchor, with no need to force the partners to use only one specific technical solution.

For instance, in a product manufacturing and trading supply chain, we may have different approaches depending on the party role.



A small raw materials producer, for instance supplying cocoa to a chocolate manufacturer, may leverage the simple JSON-LD regulatory notification message to share the two DDS numbers.

The manufacturer may then have a multi-step supply chain with some customers, involving logistic providers, where the EPCIS solution can be used to improve the logistic visibility. At the same time messages like the EANCOM DESADV can be used with customers that have an active EDI infrastructure.

The overall consistency and interoperability are enabled by the common semantic anchor provided by the GS1 Web Vocabulary data model.



# 3 GS1 Web Vocabulary Data Model

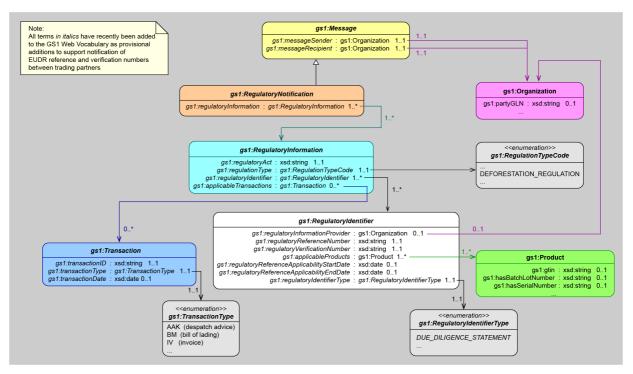
To support the exchange of the Due Diligence Statement Reference and Verification numbers, the GS1 Web Vocabulary **gs1:RegulatoryNotification** class is the semantic anchor.

This data class has been designed to support regulatory or legislative data sharing needs.

A particularly important use case is when parties are required to submit a document or dataset to a specific information system, which returns a confirmation of receipt that contains a reference number and possibly a verification number.

Those numbers, together with other relevant data, may be shared with the downstream partner to enable the fulfilment of that partner's regulatory obligations.

This is the UML class diagram from the perspective of the GS1 Web Vocabulary:



The following provides further explanation about how these are connected:

At the highest level, a new class **gs1:Message** (shown in yellow on the UML class diagram) provides two properties, **gs1:messageSender** and **gs1:messageRecipient**, both of which expect exactly one instance of the existing **gs1:Organization** class.

Through the existing **gs1:Organization** class, an organization may be identified either using the existing **gs1:partyGLN** property or via the corresponding GS1 Digital Link URI, based on /417/ followed by the 13 digit party GLN.

The **gs1:Message** class has a subclass, **gs1:RegulatoryNotification** (shown in orange on the diagram) which inherits the **gs1:messageSender** and **gs1:messageRecipient** properties from the superclass **gs1:Message** and introduces a further property, **gs1:regulatoryInformation**, which expects one or more instances of the **gs1:RegulatoryInformation** class (shown in cyanin the UML diagram).

Within the gs1:RegulatoryInformation class, the following properties are defined:

- gs1:regulatoryAct expects an xsd:string value, which precisely identifies the regulation or legislation involved. In the case of EUDR, the appropriate string value to use is "EU 2023/1115.87"
- **gs1:regulationType** expects exactly one value from the code list **gs1:RegulationTypeCode**. In the case of EUDR, the appropriate code value is "DEFORESTATION\_REGULATION".



- **gs1:regulatoryIdentifier** expects one or more instances of the gs1:RegulatoryIdentifier class (see below for further details).
- gs1:applicableTransactions expects 0 or more instances of the gs1:Transaction class.

The **gs1:Transaction** class defines two mandatory properties:

- gs1:transactionID, which expects an xsd:string and provides the transaction identifier.
- gs1:transactionType, which expects a code value from a standardized code list, gs1:TransactionType, with code values such as "IV" for invoice etc., to indicate which type of transaction the identifier corresponds to.

The **gs1:Transaction** class also defines one optional property:

 gs1:transactionDate, which expects an xsd:date value, corresponding to the date of the transaction.

The **gs1:RegulatoryIdentifier** class is shown as a white box in the UML diagram. Within this class, the following properties are defined:

- **gs1:regulatoryInformationProvider** is an optional property that expects zero or one instance of the existing **gs1:Organization** class, through which the provider of the due diligence statement may be identified either using the existing **gs1:partyGLN** property, which expects a 13-digit numeric string value for the party GLN or using the corresponding GS1 Digital Link URI that contains /417/ followed by the 13-digit numeric string value of the party GLN. This property can be omitted in case the due diligence statement provider is the same as the **gs1:messageSender**.
- gs1:regulatoryReferenceNumber and gs1:regulatoryVerificationNumber are both mandatory properties that are used to express the string values for reference number and verification number that are provided by the TRACES information system upon successful receipt of a submitted EUDR due diligence statement.
- gs1:regulatoryReferenceApplicabilityStartDate and gs1:regulatoryReferenceApplicabilityEndDate are optional properties. Both expect an xsd:date value. These may be used to express a date range during which the referenced due diligence statement is considered to be valid.
- gs1:regulatoryIdentifierType is a mandatory property that expects a code value from the gs1:RegulatoryIdentifierType code list. In the case of EUDR, the code value to be used is "DUE\_DILIGENCE\_STATEMENT".
- **gs1:applicableProducts** is a property that expects one or more instances of the existing **gs1:Product** class. When used within this lightweight regulatory notification message in JSON format, the property **gs1:applicableProducts** is considered to be mandatory. Within the **gs1:Product** class, a product may be identified either using a GS1 Digital Link URI (see below for further details) or by using the existing **gs1:gtin** property, which expects a 14-digit numeric string value.
  - If there is a need to specify product identifiers at finer granularity than class-level GTIN, the existing optional properties **gs1:hasBatchLotNumber** or **gs1:hasSerialNumber** may be used, to express a batch/lot identifier (corresponding to GS1 Application Identifier (10)) or a serial number (corresponding to GS1 Application Identifier (21)), each of which permit alphanumeric strings of up to 20 characters from the GS1 AI encodable character set 82, defined in the GS1 General Specifications.
  - As a valid and forward-looking alternative to using the properties **gs1:gtin**, **gs1:hasBatchLotNumber** and **gs1:hasSerialNumber**, the product identifiers may be specified using GS1 Digital Link URIs based on /01/ followed by the 14-digit numeric string of the GTIN, optionally followed by further primary key qualifiers such as /10/ followed by batch/lot ID and/or /21/ followed by the serial number.
- GS1 Digital Link URIs should be formatted in accordance with the GS1 Digital Link URI Syntax standard.

The data that can be exchanged, relevant to the EUDR context, is detailed in the table below.

The table will also include the reference to the technical standards that can be used to transfer the data between the trading partners.



√ = Supported

N/A = Not Applicable

N/S = Not Supported

Property	Usage/Definition	JSON- LD	EPCIS	GDSN	EANCOM	GS1 XML
messageSender	The sender of the data set. It can correspond to the owner of the DDS but there are use cases where the DDS submitter is another player	<b>√</b>	<b>√</b> ****	<b>✓</b>	<b>✓</b>	<b>√</b>
messageRecipient	The intended recipient of the data set.	<b>✓</b>	<b>√**</b> **	<b>✓</b>	<b>✓</b>	<b>✓</b>
regulationType	The type of regulation the data exchange applies to (e.g DEFORESTATION_REGULATION)	<b>√</b>	<b>✓</b>	✓	N/A *	N/A *
regulatoryAct	Reference to the specific regulatory act (e.g EU 2023/1115.87 for EUDR)	<b>✓</b>	<b>✓</b>	<b>✓</b>	N/A *	N/A *
regulatoryReferenceNumber	Reference number relevant to the regulation (e.g. DDS Reference Number)	<b>√</b>	<b>✓</b>	✓	✓	<b>√</b>
regulatoryVerificationNumber	Reference number relevant to the regulation (e.g. DDS Verification Number)	<b>√</b>	<b>✓</b>	✓	✓	<b>√</b>
applicableProducts	Identification of the products the regulatory notification refers to	<b>√</b>	<b>✓</b>	✓	✓	<b>√</b>
regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate	The interval of date into which the references are applicable	<b>√</b>	<b>✓</b>	<b>✓</b>	<b>√</b> **	N/S
hasBatchLotNumber hasSerialNumber	Lots and serials related to the references provided	<b>√</b>	<b>✓</b>	N/A	<b>✓</b>	<b>√</b>
regulatoryInformationProvider	The organisation having the ownership of the references provided in the message	<b>√</b>	<b>✓</b>	<b>√</b> ***	✓	<b>√</b> ***

<sup>(\*)</sup> the EDI technical solution implemented is specific to EUDR. No need to specify the regulation

<sup>(\*\*)</sup> The possibility to provide an interval of dates varies with the EANCOM message

<sup>(\*\*\*)</sup> The supported use case is the one where the regulatory information provider corresponds to the party owning the full message (e.g. the seller in a GS1 XML despatch advice)

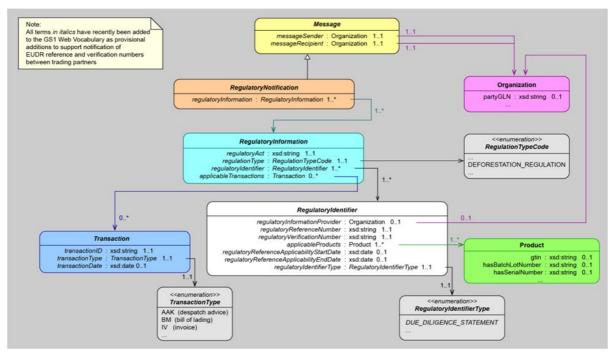
<sup>(\*\*\*\*)</sup> Note also that when EPCIS documents are used in an EDI-like approach, the XML format for EPCIS may make use of Standard Business Document Header (SBDH) fields to indicate a message sender and recipient, while the JSON format for EPCIS can make use of epcis:sender and <u>epcis:receiver</u> fields defined within the EPCIS ontology, to optionally indicate a sender and recipient. Neither the XML nor JSON format for EPCIS documents would make use of the gs1:messageSender and gs1:messageRecipient properties, although equivalent functionality exists, as described above.



# 4 JSON/JSON-LD simple exchange

A simplified JSON / JSON-LD exchange format, specifically intended for micro and small players in the supply chain.

This is the UML class diagram from the perspective of the JSON syntax used in the notification messages:



#### 4.1 The JSON-LD context resource in more detail

To make the regulatory notification message structure easier to read and easier for software to process as JSON data, a JSON-LD context resource has been developed. This takes care of all appropriate expansion of JSON keys and values to corresponding Web URIs within the GS1 Web Vocabulary, as well as data type casting of values, for values that should be interpreted as URIs or values that should be cast to specific formats such as xsd:date. This file is also provided as one of the normative artefacts.

The JSON-LD context resource file performs the following:

- 1. Maps the alias "type" to the special JSON-LD keyword "@type"
- 2. Maps the alias "id" to the special JSON-LD keyword "@id"
- 3. Declares the following namespace mappings for Compact URI Expression (CURIE) prefixes:
  - a. "gs1": "https://ref.gs1.org/voc/"
  - b. "xsd": "http://www.w3.org/2001/XMLSchema#"
- 4. Maps the following JSON fields to properties within the GS1 Web Vocabulary:

applicableTransactions	gs1:applicableTransactions
hasBatchLotNumber	gs1:hasBatchLotNumber
gtin	gs1:gtin
partyGLN	gs1:partyGLN
regulatoryReferenceNumber	gs1:regulatoryReferenceNumber
regulatoryAct	gs1:regulatoryAct



regulatoryIdentifier	gs1:regulatoryIdentifier
hasSerialNumber	gs1:hasSerialNumber
transactionID	gs1:transactionID
regulatoryVerificationNumber	gs1:regulatoryVerificationNumber

5. Maps the following JSON fields to properties within the GS1 Web Vocabulary and ensures that any string values are cast to URIs ("@type": "@id"):

applicableProducts	gs1:applicableProducts
messageRecipient	gs1:messageRecipient
messageSender	gs1:messageSender
regulatoryInformationProvider	gs1:regulatoryInformationProvider

- 6. Maps the JSON field **transactionDate** to the **gs1:transactionDate** property in the GS1 Web Vocabulary and ensures that its string value is case to an xsd:date format.
- 7. Maps the JSON field **transactionType** to the **gs1:transactionType** property in the GS1 Web Vocabulary and maps the following 'bare string' code values to the corresponding code value URIs within the GS1 Web Vocabulary:

AAK	gs1:TransactionType-AAK	
AID	gs1:TransactionType-AID	
ALO	gs1:TransactionType-ALO	
AUJ	gs1:TransactionType-AUJ	
AXO	gs1:TransactionType-AXO	
ВМ	gs1:TransactionType-BM	
BN	gs1:TransactionType-BN	
IV	gs1:TransactionType-IV	
МН	gs1:TransactionType-MH	
ON	gs1:TransactionType-ON	
VN	gs1:TransactionType-VN	

8. Maps the JSON field regulatoryInformation to the **gs1:regulatoryInformation** property in the GS1 Web Vocabulary and within its value, maps the following JSON fields to the corresponding properties in the GS1 Web Vocabulary and ensures that their values are cast to xsd:date values:

regulatoryReferenceApplicabilityStartDate	gs1:regulatoryReferenceApplicabilityStartDate
regulatoryReferenceApplicabilityEndDate	gs1:regulatoryReferenceApplicabilityEndDate

9. Maps the JSON field **regulationType** to the **gs1:regulationType** property in the GS1 Web Vocabulary and within its value, maps the following 'bare string' code values to the corresponding code value URIs within the GS1 Web Vocabulary:



DEFORESTATION_REGULATION	gs1:regulationType-DEFORESTATION_REGULATION

10. Maps the JSON field **regulatoryIdentifierType** to the **gs1:regulatoryIdentifierType** property in the GS1 Web Vocabulary and within its value, maps the following 'bare string' code values to the corresponding code value URIs within the GS1 Web Vocabulary:

DUE_DILIGENCE_STATEMENT	gs1:regulatoryIdentifierType-DUE_DILIGENCE_STATEMENT

#### 4.2 The JSON Schema validation artefact in more detail

To support validation of the notification messages a JSON Schema validation file has been developed – see <a href="https://ref.gs1.org/quidelines/eudr/json-schema.json">https://ref.gs1.org/quidelines/eudr/json-schema.json</a>

This will enable users to check that the regulatory notification messages that they send and receive are correctly formatted.

The JSON Schema performs the following checks on the EUDR Notification Message:

- 1. Checks that the message is a JSON object that specifies the following mandatory fields:
  - a. "@context"

(required to have a URI value:

https://ref.gsl.org/guidelines/eudr/context.jsonld )

b. "type"

(required to have a string value that is "RegulatoryNotification")

c. "messageSender"

(required to be either a GS1 Digital Link URI containing /417/ followed by 13 digits or an object in which the partyGLN field must specify a 13 digit numeric string)

d. "messageRecipient"

(required to be either a GS1 Digital Link URI containing /417/ followed by 13 digits or an object in which the partyGLN field must specify a 13-digit numeric string)

e. "regulatoryInformation"

(required to be an object that validates against the definition for RegulatoryInformationObject - or an array list of such objects) - see (2) below:

- 2. Performs the following checks that the value of "**regulatoryInformation**" is formatted against the definition of RegulatoryInformationObject, checking the following:
  - a. Mandatory fields within RegulatoryInformationObject:
    - i. "regulatoryAct"

(required to have a string value that exactly matches "EU 2023/1115")

ii. "regulationType"

(required to have a string value that exactly matches "DEFORESTATION\_REGULATION")

iii. "regulatoryIdentifier"

(required to be an object that validates against the definition for RegulatoryIdentifierObject - or an array list of such objects) - see (3) below:

- b. Optional fields within RegulatoryInformationObject:
  - i. "applicableTransactions"



(required to be an object that validates against the definition for TransactionObject - or an array list of such objects) – see (4) below:

- 3. Performs the following checks that the value of "**regulatoryIdentifier**" is formatted against the definition of RegulatoryIdentifierObject, checking the following:
  - a. Mandatory fields within RegulatoryIdentifierObject:
    - i. "regulatoryReferenceNumber" (required to have a string value)
    - ii. "regulatoryVerificationNumber" (required to have a string value)
    - iii. "regulatoryIdentifierType"

(required to have a string value that exactly matches "DUE\_DILIGENCE\_STATEMENT")

iv. "applicableProducts"

(required to be an object that validates against the definition for ProductIdentifier - or an array list of such objects) - see (5) below:

- b. Optional fields within RegulatoryIdentifierObject:
  - i. "regulatoryInformationProvider"

(required to be either a GS1 Digital Link URI containing /417/ followed by 13 digits or an object in which the partyGLN field must specify a 13 digit numeric string)

- ii. "regulatoryReferenceApplicabilityStartDate" (required to have a string value in xsd:date format, i.e. YYYY-MM-DD)
- iii. "regulatoryReferenceApplicabilityEndDate" (required to have a string value in xsd:date format, i.e. YYYY-MM-DD)
- 4. Performs the following checks that the value of "applicableTransactions" is formatted against the definition of TransactionObject, checking the following:
  - a. Mandatory fields within TransactionObject:
    - i. "transactionID" (required to have a string value)
    - ii. "transactionType" (required to have a string value)
  - b. Optional fields within RegulatoryInformationObject:
    - i. transactionDate

(required to have a string value in xsd:date format, i.e. YYYY-MM-DD)

- 5. Performs the following checks that the value of "applicableProducts" is formatted against the definition of ProductIdentifier, for which each specified value is required to be either:
  - a. A GS1 Digital Link URI containing /01/ followed by a 14 digit numeric string expressing the value of a Global Trade Item Number (GTIN).

Note that further GS1 Digital Link URI 'key qualifiers' may be expressed within the URI path information to constrain to a specific batch/lot, using /10/ - or to a specific serial number, using /21/

#### OR

b. An object in which the "gtin" field must be present and specified as a 14 digit numeric string for the GTIN value.

Note that within the same object, the "hasBatchLotNumber" field may also be present to specify a specific batch/lot identifier and/or the "hasSerialNumber" field may also be present to specify a specific serial number. If specified, the values for "hasBatchLotNumber" or "hasSerialNumber" are each required to be 1-20 characters in length and all from the GS1 AI encodable character set 82.



# 5 EPCIS event data

#### 5.1 Overview

The GS1 Web Vocabulary approach can, in turn, easily be leveraged by <u>EPCIS</u>, version <u>2.0 and later</u>. The "gs1:RegulatoryInformation" class and properties defined within it can be used to capture the required information in EPCIS visibility event data.

Note that EPCIS does not require the "gs1:Message" class. This is because an EPCIS Event is not intended as a message transmitted 1:1 between a message sender and message recipient, but rather as a snapshot of the physical supply chain which might be queried by authorised stakeholders further downstream. Note also that when EPCIS documents are used in an EDI-like approach, the XML format for EPCIS may make use of Standard Business Document Header (SBDH) fields to indicate a message sender and recipient, while the JSON format for EPCIS can make use of epcis:sender and epcis:receiver fields defined within the EPCIS ontology, to optionally indicate a sender and recipient.

Instead of using the property "gs1:applicableProducts", **the new property**"gs1:masterDataAvailableFor" can be used to connect an EPCIS event to a set of blocks of master data for which the RDF Subject is unambiguously specified via the "id" property, which is an alias for the JSON-LD special keyword "@id", used to indicate the RDF Subject of a set of RDF triples.

# 5.2 "Notifying" business step in an EPCIS Object Event

In the accompanying example, a GS1 Digital Link URI expressing a GTIN and Batch/Lot ID appears within the EPCIS Object Event as the value of the "epcClass" field within an element of the "quantityList" field, and additionally as the value of the "id" property for one of the elements within the list, specified by "gs1:masterDataAvailableFor". The "regulatoryInformation" field is an alias (defined within the JSON-LD context resource for GS1 Web Vocabulary and EUDR) for the property "gs1:regulatoryInformation".

Provision of EUDR-relevant regulatory information in this EPCIS Object Event with Business Step "notifying" eliminates the need for redundant inclusion of those details in any subsequent EPCIS events which capture business step "packing" or "shipping". Instead, the GTIN and Batch/Lot can be used to query the preceding "notifying" step, in which EUDR-relevant details were initially captured.



Note that readPoint and businessLocation can be optionally included but are omitted from this example to avoid confusion.

```
"@context":
                   "https://ref.gsl.org/standards/eudr/p.0.0/context.jsonld",
"https://ref.gsl.org/standards/epcis/2.0.0/epcis-context.jsonld"
          ],
"id": "https://id.example.org/document1",
"type": "EPCISDocument",
"schemaVersion": "2.0",
"creationDate": "2005-07-30T11:30:47.0Z",
"epcisBody": {
    "eventList": [
                                   "type": "ObjectEvent",
"eventTime": "2025-06-23T12:25:56Z",
"eventTimeZoneOffset": "+02:00",
                                    "action": "OBSERVE",
"bizStep": "notifying",
"persistentDisposition": {"set": ["subject_to_regulation"]},
"puntityList": [
                                                    "epcClass": "https://id.gsl.org/01/09506000134369/10/ABC12345", "quantity": 200, "uom": "KGM"
                                           },
{
                                                    "epcClass": "https://id.gsl.org/01/09506000134369/10/XYZ98765",
"quantity": 300,
"uom": "KGM"
                                          }
                                     "bizTransactionList": [
                                                    "bizTransaction": "https://transactions.sender.example/inv/XYZ123"
                                    ],
"gsl:masterDataAvailableFor": [
                                                   "id": "https://id.gsl.org/01/09506000134369/10/ABC12345", "regulatoryInformation": [
                                                                     "regulatoryAct": "EU 2023/1115",
"regulationType": "DEFORESTATION_REGULATION",
"regulatoryIdentifier": [
                                                                                     "regulatoryReferenceNumber": "r1236",
  "regulatoryVerificationNumber": "v9847",
  "regulatoryInformationProvider": "https://id.gsl.org/417/9521141123454",
  "regulatoryReferenceApplicabilityStartDate": "2025-06-01",
  "regulatoryReferenceApplicabilityEndDate": "2026-05-31",
  "regulatoryIdentifierType": "DUE_DILIGENCE_STATEMENT"
                                                                            }
                                          1
                                                                  ]
                                                    "id": "https://id.gsl.org/01/09506000134369/10/XYZ98765", "regulatoryInformation": [
                                                                    "regulatoryAct": "EU 2023/1115",
"regulationType": "DEFORESTATION_REGULATION",
"regulatoryIdentifier": [
                                                                                     "regulatoryReferenceNumber": "r987",
                                                                                     "regulatoryReferenceNumber": "r98/",
"regulatoryVerificationNumber": "v210",
"regulatoryInformationProvider": "https://infoProviderCo.example/417/9521141123454",
"regulatoryReferenceApplicabilityStartDate": "2025-01-01",
"regulatoryReferenceApplicabilityEndDate": "2025-12-31",
"regulatoryIdentifierType": "DUE_DILIGENCE_STATEMENT"
```



# 6 GS1 EDI Solution

#### 6.1 Introduction

The GS1 EDI standards are widely in use, in the GS1 community, as a data sharing solution for transactional data exchange, as well as for supply chain collaboration and traceability processes.

The following identified technical solutions provide the possibility to reuse and extend the exchanges already in place, limiting the impact and the required investments.

#### 6.2 EANCOM

#### 6.2.1 Technical solution

The EANCOM technical solution is based on the extension of the EDIFACT code list 1153 = Reference Code Qualifier.

The data element 1153 is part of the composite element C.506 in the segment RFF

RFF	- M	1	-	Reference			
Function:							
To specify	a reference.						
					ED	IFACT	EAN
C506	REFERENCE				М		М
<u>1153</u>	Reference code qualifier				М	an3	М
1154	Reference identifier				С	an70	R
1156	Document line identifier				С	an6	N
4000	Reference version identifier				С	an35	N
1060	Revision identifier				С	an6	N

Two new values have been added to the code list, identifying the Due Diligence Statement Reference Number and Due Diligence Statement Verification Number.

DDR		The unique EUDR Due Diligence Reference Number that is returned when the due diligence is registered on the EU platform
DDV	Due Diligence Verification Number	EUDR Verification Number that is created automatically by the system when registering a Due Diligence

Being that the RFF segment is widely adopted across the EANCOM set of messages, the identified solution is applicable to multiple data exchanges, specifically where this segment is used as a reference to a product level or below.

The use of the DDR and DDV values in an RFF segment at header level or, for instance, used in a segment group with a NAD segment, providing references referred to a party, is not to be considered as proper and applicable.

This standard will provide details on the implementation with the main documents that may come into play in the EUDR.

The implementation logic explained in the use cases will be applicable to other messages as well.



**Note**: Not all the data identified in the GS1 Web Vocabulary solution will be available in the EANCOM implementation. The mapping for the supported data will be provided.



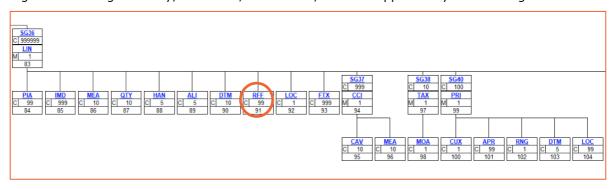


**Note:** Since the two codes in the 1153 are specific to the EUDR regulation, in the EDI exchanges, there is no need to specify the regulatory act details, as defined in the GS1 Web Vocabulary data model. The support to additional regulations will require the addition of new specific values in the 1153 code list.

#### 6.2.2 Master data alignment: PRICAT

The PRICAT message is used for product master data alignment and then, it can support only the product level of granularity.

Higher levels of granularity, like batch/lot or serial, are not supported by this message.



To express the two DDS numbers, the RFF segment in the SG36 can be used.



**Note**: the two numbers are included into two different RFF segments. There is no logical dependency between the two. The indication of multiple pairs will require a pair of RFF segment for each of the pair of DDS numbers where the verification number SHALL follow its specific reference number.



**Note:** In case the cardinality of the RFF segment is not enough to include all the pairs, the SG36 SHALL be repeated to accommodate all the pairs.

Since the usual use of the PRICAT is between the brand (or the importer) and the retailer, it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the SG2 with the data element 3035 = SU or AT.

In case there is the need to specify a specific DDS owner at line level, the NAD segment in the SG52 can be used.

The 3035 EDIFACT code list does not include a specific value for the EUDR submitter, however the value below, having a broader definition, can fit the purpose.

DT	Declarant	Party which makes a declaration to an official body or - where legally permitted - in whose name, or on whose behalf, a declaration to an official body is made
		benair, a declaration to an official body is made

In SG36, it is not possible to associate a specific pair of start and end dates (regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate in the GS1 Web Vocabulary) with each DDS. The applicability interval will be specified once for all the SG36 using the Segment DTM and the following values in the DE C507:2005



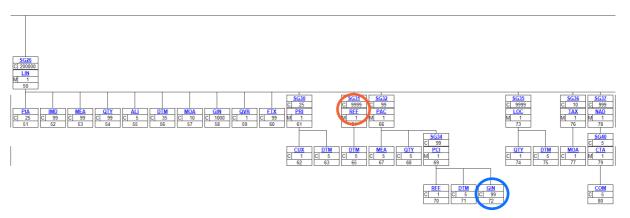
157	Validity start date	The first date of a period for which something is valid.
799	Validity end date	The last date of a period for which something is valid.

The **applicableTransactions** in GS1 Web Vocabulary can be provided through the RFF segment, in SG36, with the DE1153 indicating the proper type of reference.

#### 6.2.3 Procurement: ORDRSP

The ORDRSP is the response message to an order and provides the confirmation of the products that will be shipped.

An ORDRSP is usually generated before the specific lots or serial numbers to be shipped are fully known. In such cases, the supported level of granularity is usually the product level. Higher levels of granularity, like batch/lot or serial, are, in theory, supported by the structure of the message but may apply only to a use case where the goods are reserved upon the generation of the ORDRSP message.



The indication of the DDS reference number and verification number leverages the SG31.



**Note:** the two numbers are included into two different RFF segments. There is no logical dependency between the two. . The indication of multiple pairs will require a pair of RFF segment for each of the pair of DDS numbers where the verification number SHALL follow its specific reference number.



**Note:** In case the cardinality of the RFF segment is not enough to include all the pairs, the SG26 SHALL be repeated to accommodate all the pairs.

The RFF segment is specifically intended for the two numbers, in order to specify the properties **regulatoryReferenceApplicabilityStartDate** and **regulatoryReferenceApplicabilityEndDate** defined in GS1 Web Vocabulary, the DTM segment can be used with the C507:2005 data element assuming the following values:

194	Start date/time	Date/time on which a period starts.
209	End date/time	Date/time on which a period (from - to) ends.

The same segment group SG31 can be used to specify additional transactional references, leveraging the values available in the EDIFACT code list 1153.

Since the usual use of the ORDRSP is between the brand (or the importer) and the retailer, it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the SG3 with the data element 3035 = SU.



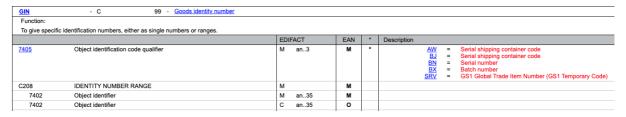
In case there is the need to specify a specific DDS owner at line level, the NAD segment in the SG37 than can, technically, be used.

The 3035 EDIFACT code list does not include a specific value for the EUDR submitter, however the value below, having a broader definition, can fit the purpose.

DT	Declarant	Party which makes a declaration to an official body or - where legally permitted - in whose name, or on whose behalf, a declaration to an official body is made
		behalf, a declaration to an official body is made

As stated at the beginning of the section, the ORDRSP typically applies only at the product level.

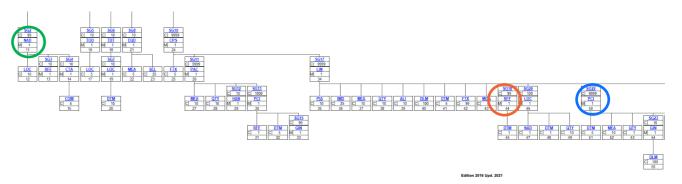
In the specific use case where the goods reservation is done, there is the chance to specify a set of lots and / or serials using the segment GIN, evidenced with the blue circle in the figure, in the SG34.



## 6.2.4 Shipment: DESADV

The DESADV message provides the goods recipient with complete details of the shipment composition, including logistic units, products, lots, serial numbers, and expiry dates.

The supported level of details and granularity makes the DESADV the preferrable solution when the requirement is to implement a level of granularity higher than the simple product level.



The indication of the DDS reference number and verification number SHALL use the SG18.



**Note:** the two numbers are included into two different RFF segments. There is no logical dependency between the two. The indication of multiple pairs will require a pair of RFF segment for each of the pair of DDS numbers where the verification number SHALL follow its specific reference number.



**Note:** In case the cardinality of the RFF segment is not enough to include all the pairs, the SG17 SHALL be repeated to accommodate all the pairs.

The same segment group SG18 can be used to specify additional transactional references, using the values available in the EDIFACT code list 1153.

In order to specify the properties **regulatoryReferenceApplicabilityStartDate** and **regulatoryReferenceApplicabilityEndDate** defined in GS1 Web Vocabulary, since the DTM



included in the SG18 has a restricted set of allowed values, the available solution is to use the SG22, evidenced in blue in the figure.

The DTM segment can be used with the C507:2005 data element assuming the following values:

194	Start date/time	Date/time on which a period starts.
209	End date/time	Date/time on which a period (from - to) ends.

The segment GIN, in the SG23, can, then, be used to specify the set of lots or serials that are covered by the DDS.

According to the usual application of the DESADV it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the SG2 with the data element 3035 = SU.

In the DESADV structure, it is not possible to specify the DDS owner at the line level. The only available option is to use SG2 at the header level, which means that the **regulatoryInformationProvider** will apply to the entire message rather than to specific lines. The 3035 EDIFACT code list does not include a specific value for the EUDR submitter, however the value below, having a broader definition, can fit the purpose.

DT	Declarant	Party which makes a declaration to an official body or - where legally permitted - in whose name, or on whose
		behalf, a declaration to an official body is made

#### **6.2.5 Logistic Process: INSDES**

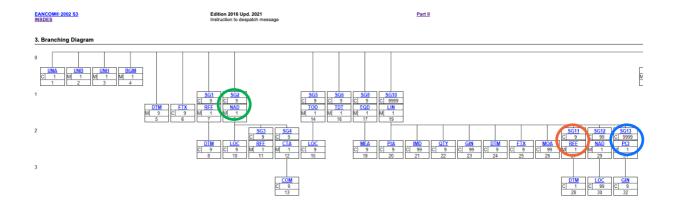
The INSDES is a message that provides the instructions to despatch to a third party service provider.

The INSDES can be used to identify at a complete message level or at a line item level;

- the delivery location(s)
- the date(s) on which delivery(s) should take place
- etc.

In the context of the EUDR regulation, it can be used to provide also the Due Diligence Statement Reference and Verification Numbers.

This applies, in particular, to use case when the service provider will deliver the goods and will generate the DESADV for the recipient, having the need to include those numbers there.



The indication of the DDS reference number and verification number leverages the SG11.



**Note:** the two numbers are included into two different RFF segment. There isn't any logical dependency between the two. The indication of multiple pairs will require a pair of RFF



segment for each of the pair of DDS numbers where the verification number SHALL follow its specific reference number.

- **Note:** In case the cardinality of the RFF segment is not enough to include all the pairs, the SG10 SHALL be repeated to accommodate all the pairs.
- The same segment group SG11 can, also, be used to specify additional transactional references, leveraging the values available in the EDIFACT code list 1153. For references applicable to all the message, the SG1 can be used as well.
- Note: The actual INSDES structure <u>does not support</u> the properties regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate defined in GS1 Web Vocabulary, since the DTM included in the SG11 has a restricted set of allowed values and same happens with the DTM in the SG10. To enable the use of the DTM segment in the SG11, an extension of the restricted code list would be needed, adding the following values:

194	Start date/time	Date/time on which a period starts.
209	End date/time	Date/time on which a period (from - to) ends.

The segment GIN, in the SG13, can, then, be used to specify the set of lots or serials that are covered by the DDS.

According to the usual application of the INSDES it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the SG2 with the data element 3035 = SU or = OB.

In the INSDES structure, it is not possible to specify the DDS owner at the line level. The only available option is to use SG2 at the header level, which means that the regulatoryInformationProvider applies to the entire message rather than to individual lines. The 3035 EDIFACT code list does not include a specific value for the EUDR submitter, however the value below, having a broader definition, can fit the purpose.

DT	Declarant	Party which makes a declaration to an official body or - where legally permitted - in whose name, or on whose behalf, a declaration to an official body is made
----	-----------	---

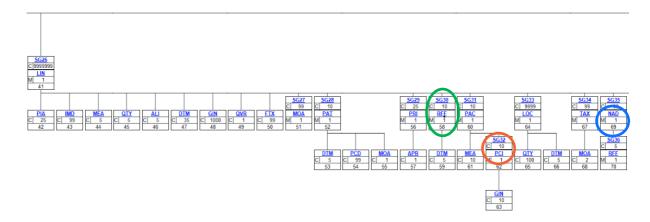
#### 6.2.6 Payment: INVOIC

The INVOIC is a message claiming payment for goods or services supplied under conditions agreed between the seller and the buyer.

Although it is usually a document issued at the end of the transaction, when the goods have already been delivered to the recipient, there are use cases where the document comes into play in earlier stages of the supply chain.

An example can be the "immediate invoice", that is issued immediately when the shipment starts and legally substitutes the shipping document. The message then assumes a double role, being at the same time a financial document and a logistic document, carrying also the EUDR related data.





The indication of the DDS reference number and verification number uses the SG30.

- **Note:** the two numbers are included into two different RFF segments. There is no logical dependency between the two. . The indication of multiple pairs will require a pair of RFF segment for each of the pair of DDS numbers where the verification number SHALL follow its specific reference number.
- **Note:** In case the cardinality of the RFF segment is not enough to include all the pairs, the SG26 SHALL be repeated to accommodate all the pairs.
- Important: The same segment group SG30 can, also, be used to specify additional transactional references, leveraging the values available in the EDIFACT code list 1153. For references applicable to all the messages, the SG1 can be used as well.
- The actual INSDES structure <u>does not support</u> the properties regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate defined in GS1 Web Vocabulary, since the DTM included in the SG30 has a restricted set of allowed values and same happens with the DTM in the SG26. To enable the use of the DTM segment in the SG30, an extension of the restricted code list would be needed, adding the following values:

194	Start date/time	Date/time on which a period starts.
209	End date/time	Date/time on which a period (from - to) ends.

**Note:** The actual structure of the INVOIC message <u>does not support</u> a level of granularity higher than the GTIN. Unlike the other messages, the GIN segment, in the SG32, can express only the SSCC while lots and serial numbers are not supported. In order to include this support, an extension of the restricted list of the values for the DE7405 would be needed.

According to the usual application of the INVOIC it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the SG2 with the data element 3035 = SU.

If needed, the structure of the INVOIC provides the possibility to specify the **regulatoryInformationProvider** both at header level, in the SG2, and at line level, in the SG35.

Multiplicity Definition



The 3035 EDIFACT code list does not include a specific value for the EUDR submitter, however the value below, having a broader definition, can fit the purpose.

DT	Declarant	Party which makes a declaration to an official body or - where legally permitted - in whose name, or on whose behalf, a declaration to an official body is made
		benair, a declaration to an official body is made

#### 6.3 GS1 XML

#### 6.3.1 Technical solution

The GS1 XML technical solution is based on the extension of the code list for the **transactionalReferenceTypeCode** type and it is used in the classes **TransactionalGenericReference** and **TransactionalReference**.

#### **TransactionalGenericReference** Name TransactionalGenericReference Reference to an associated information in support of related business processes. The type of references are defined in the Definition TransactionalReferenceTypeCode list. **Attributes** Multiplicity Length transactionalReferenceTypeCode TransactionalReferenceTypeCode 1..1 1..1 transactionalReferenceValue string {1..200} transactionalReferenceDateTime dateTime 0..1 **TransactionalReference** Reference to an associated document containing information in support of related business processes. E.g. a purchase order, a bill of Definition lading, etc. ;new class added in MR3 to replace some uses of TypedEntityIdentification Generalizations

Two new values have been added to the code list, identifying the Due Diligence Statement Reference Number and Due Diligence Statement Verification Number.

TransactionalReferenceTypeCode

Ecom\_DocumentReference

DDR	Due Diligence Reference Number	The unique EUDR Due Diligence Reference Number that is returned when the due diligence is registered on the EU platform
DDV	Due Diligence Verification Number	EUDR Verification Number that is created automatically by the system when registering a Due Diligence

These classes are widely adopted across the GS1 XML set of messages, so the identified solution is applicable to multiple data exchanges, specifically where this segment is used as a reference to a product level or below.

Generalization

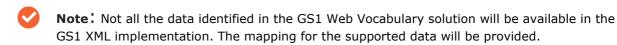
Attributes

transactional Reference Type Code



This guideline will provide details on the implementation with the main documents that may come into play in the EUDR.

The implementation logic explained in the use cases will be applicable to other messages as well.



- Note: Since the two codes in the **transactionalReferenceTypeCode** are specific to the EUDR regulation, in the EDI exchanges, there is no need to specify the regulatory act details, as defined in the GS1 Web Vocabulary data model. The support to additional regulations will require the addition of new specific values in the code list.
- Important: The master data message, the Item Data Notification message, <u>does not include</u> any of the classes supporting the **transactionalReferenceTypeCode** data type. Therefore, the master data alignment process is not supported in the EUDR context.

#### **6.3.2** Procurement: Order Response

The Order Response is the response message to an order and provides the confirmation of the products that will be shipped.

An Order Response is usually generated before the specific lots or serial numbers to be shipped are fully determined. In such cases, the supported level of granularity is generally the product level. Higher levels of granularity, like batch/lot or serial, are, in theory, supported by the structure of the message but may apply only to a use case where the goods are reserved upon the generation of the Order Response message.

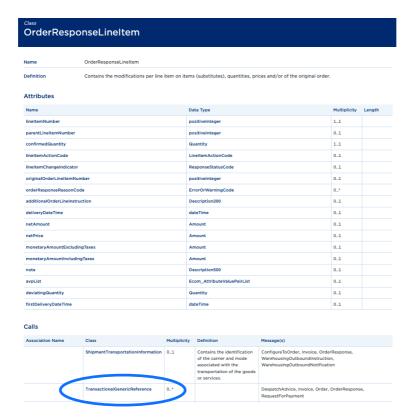
The indication of the DDS reference number and verification number leverages the association **TransactionalGenericReference** included in the class **OrderResponseLineItem**.

This class provides the details of a confirmed line.



**Note**: the two numbers are included into two different instances of the TransactionalGenericReference class. There is no logical dependency between the two. The indication of multiple pairs SHALL follow logical ordering with the reference number preceding its specific verification number







Note: The regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate, defined in GS1 Web Vocabulary, do not have a corresponding pair of attributes. There is a date, transactionalReferenceDateTime, but it represents the date the reference has been issued and therefore it cannot be assumed to be the applicability start date

The same TransactionalGenericReference class can be used to provide references to other transactions or documents. The allowed references are specified in the **transactionalReferenceTypeCode** code list.

Since the usual use of the Order Response is between the brand (or the importer) and the retailer, it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the **seller** class in the header of the message.



**Note**: the actual structure of the message <u>does not support</u> the need to specify a specific DDS owner, neither at header level, nor at line level.

As stated at the beginning of the section, the Order Response typically applies only at the product level. In the specific use case where the goods reservation is done, there is the chance to specify a set of lots and / or serials using the class **TransactionalItemData** 



Class Transactio	nalltemData			
Name	Transactional Item Data			
Definition	Dynamic characteristics used to specify individual instances of a trade item, such as the best before date, batch number or serial number.			
Attributes				
Name		Data Type	Multiplicity	Length
availableForSaleDate		date	01	
batchNumber		string	01	{180}
bestBeforeDate		date	01	
countryOfOrigin		CountryCode	01	
itemExpirationDate		date	01	
lotNumber		string	01	{180}
packagingDate		date	01	
productionDate		date	01	
productQualityIndicat	ion	Quantity	01	
sellByDate		date	01	
serialNumber		string	0*	{120}
shelfLife		string	01	{180}
tradeItemQuantity		Quantity	01	
avpList		Ecom_AttributeValuePairList	01	
itemInContactWithFoo	odProduct	boolean	01	

## **6.3.3** Shipment: Despatch Advice

The DESADV message provides the goods recipient with complete details of the shipment composition, including logistic units, products, lots, serial numbers, and expiry dates. The supported level of details and granularity makes the Despatch Advice the preferrable solution when the requirement is to implement a level of granularity higher than the simple product level.

The indication of the DDS reference number and verification number uses the association **TransactionalGenericReference** included in the class **DespatchAdviceLineItem**.

This class provides the details of a shipped line.



**Note**: the two numbers are included into two different instances of the TransactionalGenericReference class. There is no logical dependency between the two. The indication of multiple pairs SHALL follow a logical ordering with the reference number preceding its specific verification number.



Note: The regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate, defined in GS1 Web Vocabulary, do not have a corresponding pair of attributes in the GS1 XML Despatch Advice. There is a date, transactionalReferenceDateTime, but it represents the date the reference has been issued and therefore it cannot be assumed to be the applicability start date.

The same TransactionalGenericReference class can be used to provide references to other transactions or documents. The allowed references are specified in the **transactionalReferenceTypeCode** code list.

Usually, the Despatch Advice is issued by the supplier or by the logistic provider.

In case the exchange is between the brand (or the importer) and the retailer, even if the shipment is done by a logistic provider issuing the message, it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the **seller** class in the header of the message.

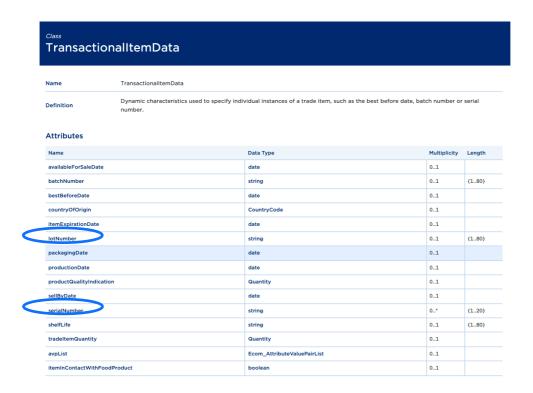




**Note**: the actual structure of the message <u>does not support</u> the option to specify a specific DDS owner, different from the seller, neither at header level, nor at line level.

The Invoice message supports multiple levels of granularity, from product level to lot or serial level.

To specify a set of lots and / or serials the class **TransactionalItemData** can be used.



## 6.3.4 Payment: Invoice

The INVOIC is a message claiming payment for goods or services supplied under conditions agreed between the seller and the buyer.

Although it is usually a document issued at the end of the transaction, when the goods have already been delivered to the recipient, there are use cases where the document comes into play in earlier stages of the supply chain.

An example can be the "immediate invoice", that is issued immediately when the shipment starts and legally substitutes the shipping document. The message, then, assumes a double role, being at the same time a financial document and a logistic document, carrying also the EUDR related data.

The indication of the DDS reference number and verification number uses the association **TransactionalGenericReference** included in the class **InvoiceLineItem**.

This class provides the details of an invoiced line.



**Note**: the two numbers are included into two different instances of the TransactionalGenericReference class. There is no logical dependency between the two. The indication of multiple pairs SHALL follow a logical ordering with the reference number preceding its specific verification number





Note: The regulatoryReferenceApplicabilityStartDate and regulatoryReferenceApplicabilityEndDate, defined in GS1 Web Vocabulary, do not have a corresponding pair of attributes in GS1 XML Invoice. There is a date, transactionalReferenceDateTime, but it represents the date the reference has been issued and therefore it cannot be assumed to be the applicability start date

The same TransactionalGenericReference class can be used to provide references to other transactions or documents. The allowed references are specified in the **transactionalReferenceTypeCode** code list.

Usually, the Despatch Advice is issued by the supplier or by the logistic provider.

In case the exchange is between the brand (or the importer) and the retailer, even if the shipment is done by a logistic provider issuing the message, it can be assumed that the **regulatoryInformationProvider**, as defined in GS1 Web Vocabulary, corresponds to the party indicated in the **seller** class in the header of the message.



**Note**: the actual structure of the message <u>does not support</u> the need to specify a specific DDS owner, neither at header level, nor at line level.

The Despatch Advice message supports multiple levels of granularity, from product level to lot or serial level.

To specify a set of lots and / or serials the class **TransactionalItemData** can be used.

Class				
Transactio	onalltemData			
Name	TransactionalItemData			
Definition	Dynamic characteristics used to specify individual instances of a trade item, such as the best before date, batch number or serial number.			
Attributes				
Name		Data Type	Multiplicity	Length
availableForSaleDate		date	01	
batchNumber		string	01	{180}
bestBeforeDate		date	01	
countryOfOrigin		CountryCode	01	
itemExpirationDate		date	01	
lotNumber		string	01	{180}
packagingDate		date	01	
productionDate		date	01	
productQualityIndicat	ion	Quantity	01	
sellByDate		date	01	
serialNumber		string	0*	{120}
shelfLife		string	01	{180}
tradeltemQuantity		Quantity	01	
avpList		Ecom_AttributeValuePairList	01	
itemInContactWithFor	adProduct	boolean	01	



# 7 GDSN Solution

#### 7.1 Introduction

The GS1 Global Data Synchronisation Network (GS1 GDSN) is the world's largest product data network. With GDSN, high-quality product content is uploaded, maintained and shared automatically, ensuring trading partners have immediate access to the most current and complete information needed to exchange products on both local and global markets.

GDSN is based on the master data approach and enables the structured exchange of product data across the supply chain.

Some of the information provided via GS1 Web Vocabulary can also be transmitted through GDSN. This includes key EUDR-relevant data elements such as the EUDR applicability, the Reference Number and the Verification Number.

The GDSN approach supports data readiness at the GTIN-level, allowing for early-stage preparation and integration into internal systems. When both trading partners have implemented a GDSN-based solution, this standard can effectively be used to communicate the Reference and Verification Number as required by EUDR.

#### 7.2 Technical solution

Attributes that can be transmitted using the GDSN Standard:

Module	Class	Attribute	Definition
RegulatedTradeItem	RegulatoryInformation	regulationTypeCode (= DEFORESTATION_REGULATION) isTradeItemRegulationCompliant (= TRUE - the product is subject to EUDR) (= NOT_APPLICABLE - the product is	The code indicating a type of regulation.  The indicator specifying whether the product is subject to EUDR or not.
		not subject to EUDR)	Remark: This definition is specific to regulationTypeCode = DEFORESTATION_REGULA TION.
		regulatoryReferenceNumber	A reference number for a record, document or dataset stored within a regulatory information system, repository or registry.
		regulatoryVerificationNumber	A verification number for a record, document or dataset stored within a regulatory information system, repository or registry, typically used in combination with the reference number when requesting access to the referenced document or dataset.
		regulatoryReferenceAvailabiltyStartDate	The earliest date from which the referenced information becomes applicable.
		regulatoryReferenceAvailabiltyEndDate	The final date for which the referenced information remains applicable.
		regulatoryIdentifierType (= DUE_DILIGENCE_STATEMENT)	The code indicating the type of regulatory information that is referenced.



## 7.3 General Use Case – EUDR Applicability

Suppliers may use GDSN to inform retailers about products which are subject to EUDR as retailers are obliged to ascertain that these products have not caused deforestation and can be sold to the consumer in EU. Following regulation information attributes shall be used:

- regulationTypeCode: DEFORESTATION\_REGULATION
- isTradeItemRegulationCompliant: TRUE, NOT\_APPLICABLE
  - Use value 'TRUE' if EUDR applies to the product: the product's Combined Nomenclature (CN) code is listed in Annex I of EUDR and it either contains, has been fed with, or has been produced using the relevant commodities.
  - Use value 'NOT\_APPLICABLE' if EUDR does not apply to the product: the product's CN code
    is not listed in Annex I of EUDR or it does not contain, has not been fed with, and has not
    been produced using the relevant commodities.

## 7.4 Use Case When Sharing Due Diligence Information

GDSN may be applied to products limited in quantity or time – for example, one-off or seasonal products with clearly defined quantities – where the respective sourcing parameters remain stable.

An example would be wooden garden furniture. These types of products lend themselves well to a master-data driven approach, where EUDR-related information – such as the Reference Number (regulatoryReferenceNumber) and the Verification Number (regulatoryVerificationNumber) – can be transmitted once and remain valid over a longer period.

In such cases, GDSN can be used to exchange the relevant regulatory identifier type (regulatoryIdentifierType), such as the Due Diligence Statement (DDS), the reference number and the verification number via GDSN.

Since these products are typically planned well in advance, the DDS can be prepared proactively to cover the anticipated quantities for the relevant period.

This information SHOULD include a Validity Start Date (regulatoryReferenceAvailabiltyStartDate) and Validity End Date (regulatoryReferenceAvailabiltyEndDate) to define the intended applicability of DDS and associated identifiers.

It should be noted that these dates reflect declared validity and do not inherently verify deforestation-free status at the batch level.

If an additional DDS is created later (e.g. for next year's stock), the entire product class (*RegulatoryIdentifier*) can be repeated in GDSN with the updated Reference Number, Verification Number, and the new Validity Period. This helps business partners distinguish which DDS is intended for a given period.

The EUDR applicability (regulationType + isTradeItemRegulationCompliant) SHOULD be communicated early via GDSN.

This gives non-SME buyers sufficient time to identify any obligations under the EUDR – such as whether a DDS must be carried out before the product is placed on the market.

If the product is sold shortly after ordering (i.e., within a short sales cycle), the seller should consider informing the buyer separately and directly about the EUDR compliance data to ensure timely availability.



**Note**: The master data approach using GDSN is most suitable when EUDR Reference and Verification Numbers remain stable for extended periods. For products with relatively stable documentation and predictable ordering cycles, GDSN may offer a framework for sharing regulatory data, though its applicability depends on the consistency of underlying compliance information.

For products with fluctuating sourcing, additional traceability mechanisms beyond GDSN may be necessary to ensure compliance. GDSN does not replace batch-level verification processes required



under EUDR. Companies should assess whether GDSN is appropriate for their product and sourcing setup.



# **Examples**

Future examples will be available via <a href="https://ref.gs1.org/standards/eudr/artefacts">https://ref.gs1.org/standards/eudr/artefacts</a>