Guide: **The Five Phases of Implementing a Solution for EUDR**

A Practical 5-Phase Approach to EUDR

EUDR implementation has at times been presented as straightforward. But, in reality, most organizations discover that there is an operational, organisation side to the task that they haven't considered, making the task more complex.

EUDR requires organizations to redesign how they collect, validate, and govern supplier and product data across multiple functions and external partners. This introduces operational complexity, dependency on supplier readiness, and a need for strong internal coordination.

Organizations that approach EUDR with a realistic understanding of this complexity are better positioned to avoid delays, ensure data quality, and reduce compliance risk.

This guide takes a more realistic approach. It is based on hands-on experience from Qarma's project managers, who have worked directly with multiple companies to implement EUDR in practice.

Drawing on these real implementation journeys, the guide breaks EUDR into five clear phases—helping you move from initial planning to full submission in a controlled and scalable way.

Phase 1: Initial Rollout

Timeline: ~4 weeks

The first phase establishes the foundation for your EUDR implementation. Without clear governance and ownership, even well-designed processes will fail to scale.

Key objectives

- Understand legal requirements under EUDR
- Define governance structure
- Assign ownership across teams
- Initiate internal planning

What this means in practice

Organizations must first translate regulation into operational requirements. This includes identifying which products, suppliers, and flows are in scope, and determining how responsibility is distributed internally.

Clear ownership is critical. Typically, responsibilities are split across compliance, sourcing, logistics, and IT—but must be coordinated centrally.

Phase 2: Design and Planning

Timeline: ~5-7 weeks

This phase focuses on building the operational model and defining how compliance will work day-to-day.

Key objectives

- Design internal processes
- Assign roles and responsibilities
- Define data requirements
- Plan IT setup and integration approach

Core questions to answer

- Who inputs data?
- Who reviews and validates it?
- Who makes the hard decisions?
- Who submits to EU TRACES?

Data requirements (minimum)

To comply with EUDR, organizations must structure and collect:

- Order data (order number, item number, item name)
- Supplier information
- Product data (HS code, net weight)
- Logistics data (ETD, country of entry)
- Activity classification (import, trade, etc.)
- Country of activity (customs clearance location)

IT considerations

Organizations must decide between:

- Full system integration
- Semi-automated (e.g., Excel-based workflows)

The right choice depends on scale, complexity, and internal resources—but should support traceability, validation, and auditability.

Phase 3: Supplier Engagement & Preparation

Timeline: ~12 weeks

Supplier readiness is often the most time-consuming and high-risk part of EUDR implementation.

Key objectives

- Communicate requirements to suppliers
- Explain legal obligations and business impact
- Collect required documentation
- Onboard suppliers into systems
- Train and support suppliers

What typically happens here

Suppliers must begin uploading required data and documentation. This requires clear communication, structured onboarding, and ongoing support. Delays in this phase are common - often due to lack of clarity, long document hunts for suppliers and sometimes even opposition to adopt a new tool.

Key success factors

- Clear, simple communication
- Standardized onboarding flows
- Continuous supplier support
- Visibility into supplier progress

Phase 4: Internal Review & Approval

Timeline: ~5 weeks

Once data starts flowing in, organizations must ensure it is accurate, complete, and compliant.

Key objectives

- Validate supplier data
- Review documentation
- Ensure compliance with EUDR requirements
- Approve data for submission

What this involves

- Checking completeness of submissions
- Verifying document validity
- Ensuring consistency across datasets

This phase is critical for reducing compliance risk before submission.

Phase 5: DDS Submission to EU TRACES

Timeline: ~5 weeks

The final phase involves submitting Due Diligence Statements (DDS) to the EU TRACES system.

Key objectives

- Perform final validation
- Submit DDS
- Ensure successful registration in EU TRACES

Key considerations

- Data must be complete and validated
- Submission processes must be reliable and repeatable
- Audit trails must be maintained

From Complexity to Control

EUDR implementation is not just a compliance exercise - it is an operational transformation. Organizations that succeed are those that:

- Establish clear ownership early
- Design scalable processes
- Engage suppliers effectively
- Ensure high data quality
- Leverage the right technology

How Qarma Supports EUDR Implementation

Qarma enables organizations to operationalize EUDR efficiently by:

- Structuring data collection
- Ensuring safeguards for data quality and validation
- Streamlining supplier onboarding
- Supporting DDS submission workflows
- Providing full auditability

Whether you are at an early planning stage or already engaging suppliers, Qarma helps reduce complexity and accelerate your path to compliance.

Ready to Get Started?

If you want to understand how your organization can implement EUDR efficiently, reach out to learn how Qarma can support your journey.