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# BCP EUDR Solution

Launch of the BCP EUDR Solution

2<sup>nd</sup> September 2025





# Agenda

1. **Welcome and Agenda**
2. **Solution Overview:** Demonstration of Key Features
3. **Supply Chain Perspectives:** Hear from Emami Paper Mills and CPI
5. **Call to Action:** Next steps for Mills and Suppliers
6. **Q&A**





# 1. Introduction



# An Introduction to the BCP EUDR Solution

With financial support from 12 publishers, BCP has developed its own solution to support the publishing supply chain with EUDR compliance.

We think this is important because:



EUDR requires a vast amount of data gathering from the supply chain, not least geolocation coordinates. The success of any solution will depend on it receiving **engagement from the supply chain**.



Book Chain Project has a proven track record of **engaging directly with the paper mill and printing supply chain** on behalf of the publishing industry, building their capacity to **provide data in a standard format**.



Paper sourcing is highly complex due to varied and mixed pulp inputs. Book Chain Project's deep **understanding of mill processes**, and sourcing strategies ensures a **practical and tailored solution for EUDR compliance**.



With nearly 20 years of experience, we understand the **challenges** mills face and focus on both data collection and **building their capacity** to meet new reporting requirements.



# The development of the solution has been financed by



\* Also includes Laurence King

\*\*Also includes PRH subsidiaries: DK, Hay House and Little Tiger

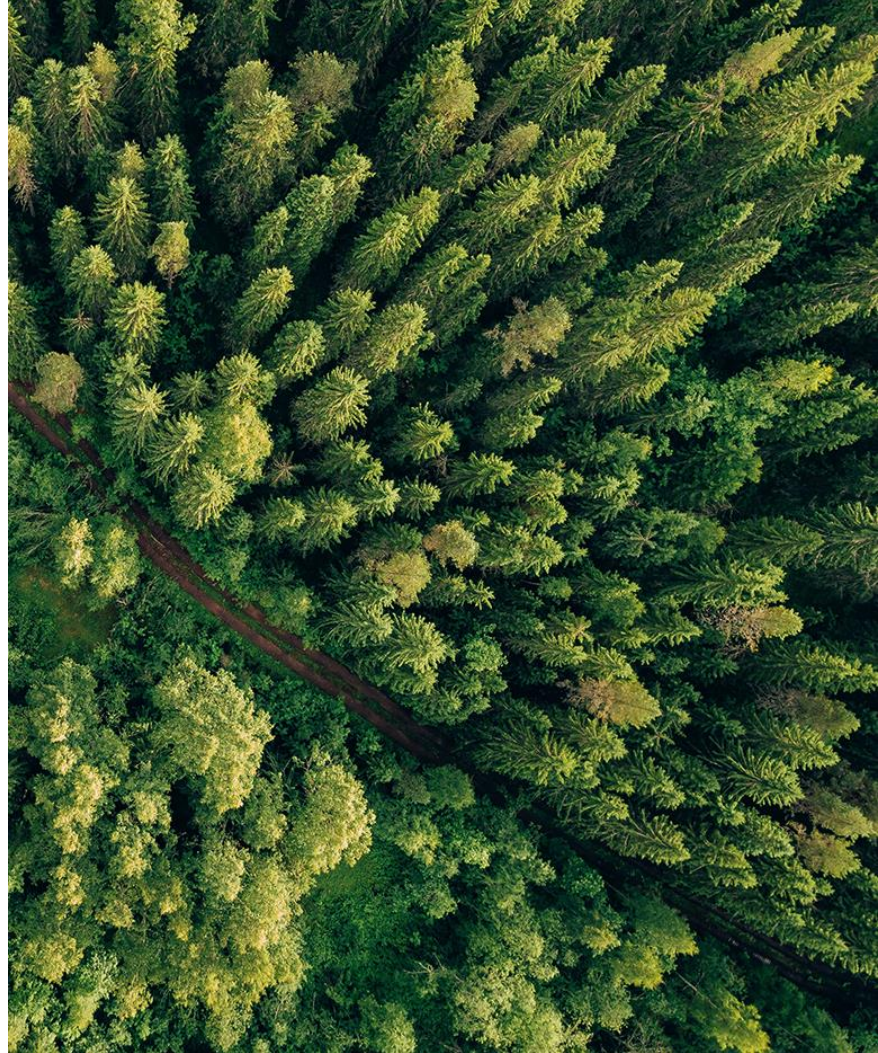
Plus, investment from  SLR



# Purpose of the Solution

The EUDR Solution facilitates data sharing and due diligence to support EUDR compliance. The Solution is designed to:

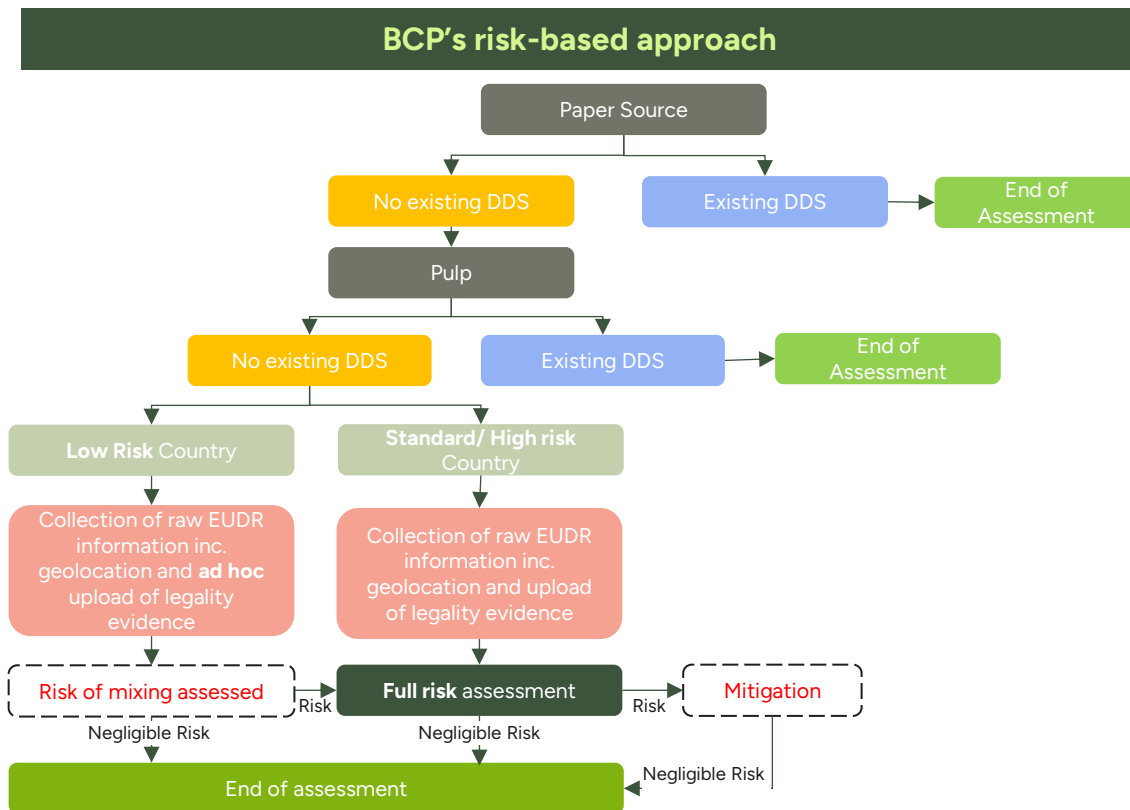
1. **Collect** relevant EUDR information (raw data and/ or DDS) from paper mills for the paper they produce.
2. **Assess risk** for deforestation/ degradation and legality.
3. Enable suppliers and publishers to **access mill data** and **view risk assessment** results.
4. Allow suppliers and publishers to **compile/ view a Bill of Paper** and **download and share EUDR information** with their customers.





# Risk-based Approach

- ❑ The Solution takes a risk-based approach, focusing on standard and high-risk sources:
  - No existing DDS
  - Following EU classifications
- ❑ Where DDS for paper sources exists, no further information will be required.

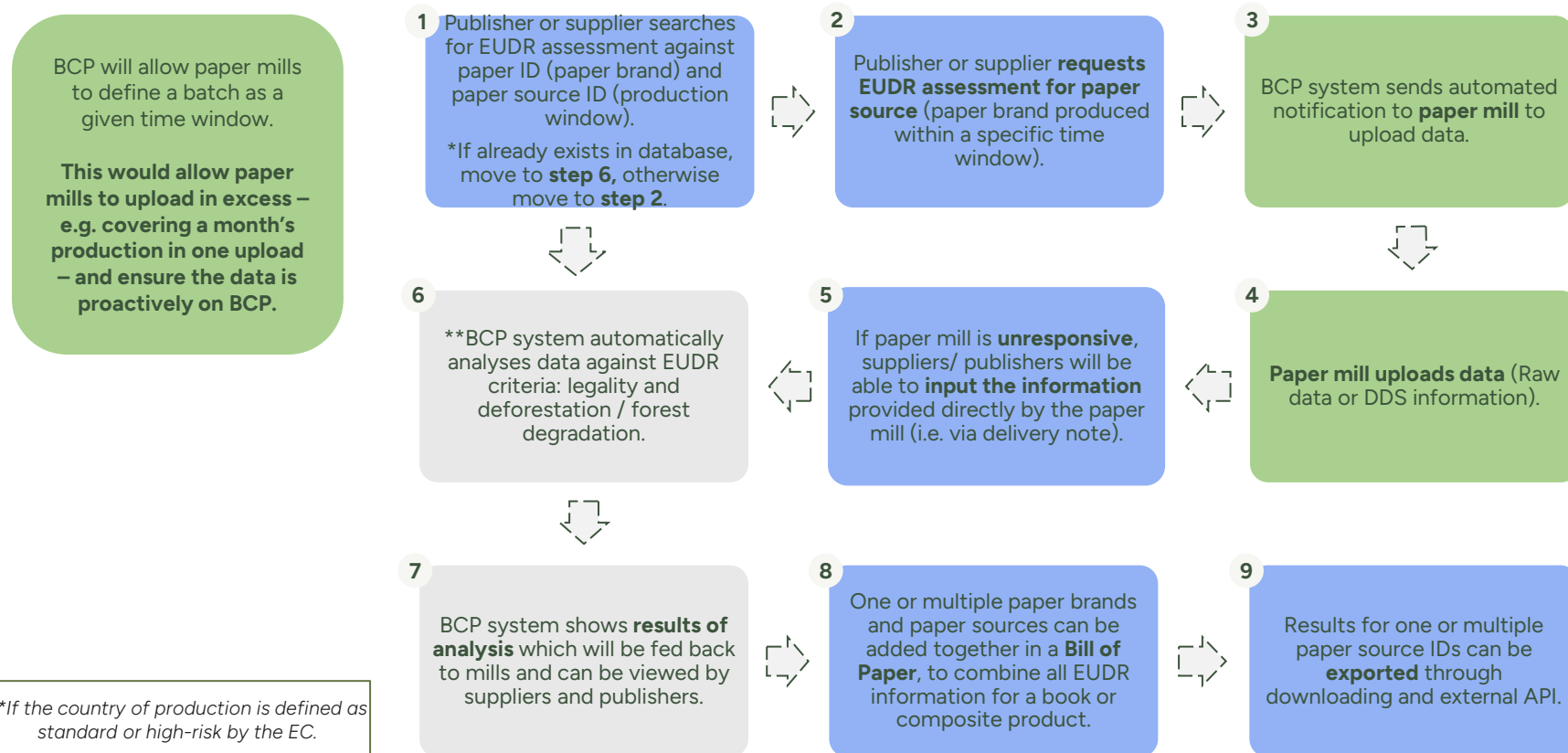




## 2. Solution overview



# High-level Workflow





# Features of the BCP Solution for Paper Mills



Standardised upload of EUDR information per paper source:

**Raw EUDR data** inc. geolocations and legality **OR DDS Reference and Verification** number

Flexibility in the frequency of data upload (daily, weekly, monthly etc)



**Automated risk assessment** for deforestation and legality for standard and high-risk sources



**1:1 support** from the BCP team if any risks are flagged



# Benefits of the BCP Solution for Paper Mills



**Avoidance of duplication** →  
share information with suppliers  
and publishers in one upload\*



Paper mills can use the BCP risk  
assessment and due diligence  
process to **comply with EUDR**



Data input designed with **paper  
mills in mind through consultation  
with 17** paper mills (1:1 and Working  
Group)

*\*While our preference remains for data to be input directly by paper mills, we understand that many mills have established their own processes for sharing data. To help avoid delays and ensure completeness of data, we have now enabled suppliers and publishers to enter DDS reference and verification information directly into the BCP system for paper when shared by other means (e.g. delivery note).*

## A high-angle, vertical photograph looking down into a dense forest. The image is filled with a thick canopy of green leaves, showing various shades from bright lime green to deep forest green. The texture is highly detailed, with individual tree crowns and branches visible through the foliage. The lighting appears to be natural daylight, creating a vibrant and lush atmosphere.



*\*Standard or high-risk sources as defined by the EU*

# Mill System Demo



EURD Test 0% Logout

Home Browse Bulletins Resources Events News Contact

## Mill Details ?

EDIT

Name EURD Test Mill ★

Mill Group EURD Test Mill Group ★

Country United Kingdom ●●●●●●

SME ?



## EURD Survey

Created 23 Jul 2025 EURD Test ★▲

Submitted 28 Jul 2025 Daniel Witte

View

## Messages [0] ?

ADD

## Users [1] ?

Name Job Title

EURD Test ★▲

ADD





# Features of the BCP Solution for Suppliers



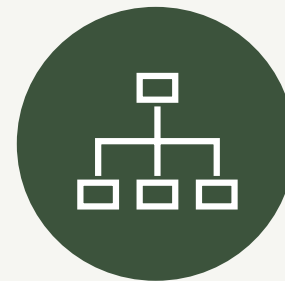
**View/ request EUDR information** from paper mills for a specific paper source



Where not already in the system, **input of DDS reference and verification numbers** for paper (provided offline by mill)



**View outcome** of the risk assessment



One or multiple paper brands and paper sources can be added together in a **Bill of Paper**, to combine all EUDR information for a book or composite product



# Benefits of the BCP Solution for Suppliers



**Cost effective due diligence solution for suppliers** → Supplier access through the forest sourcing subscription



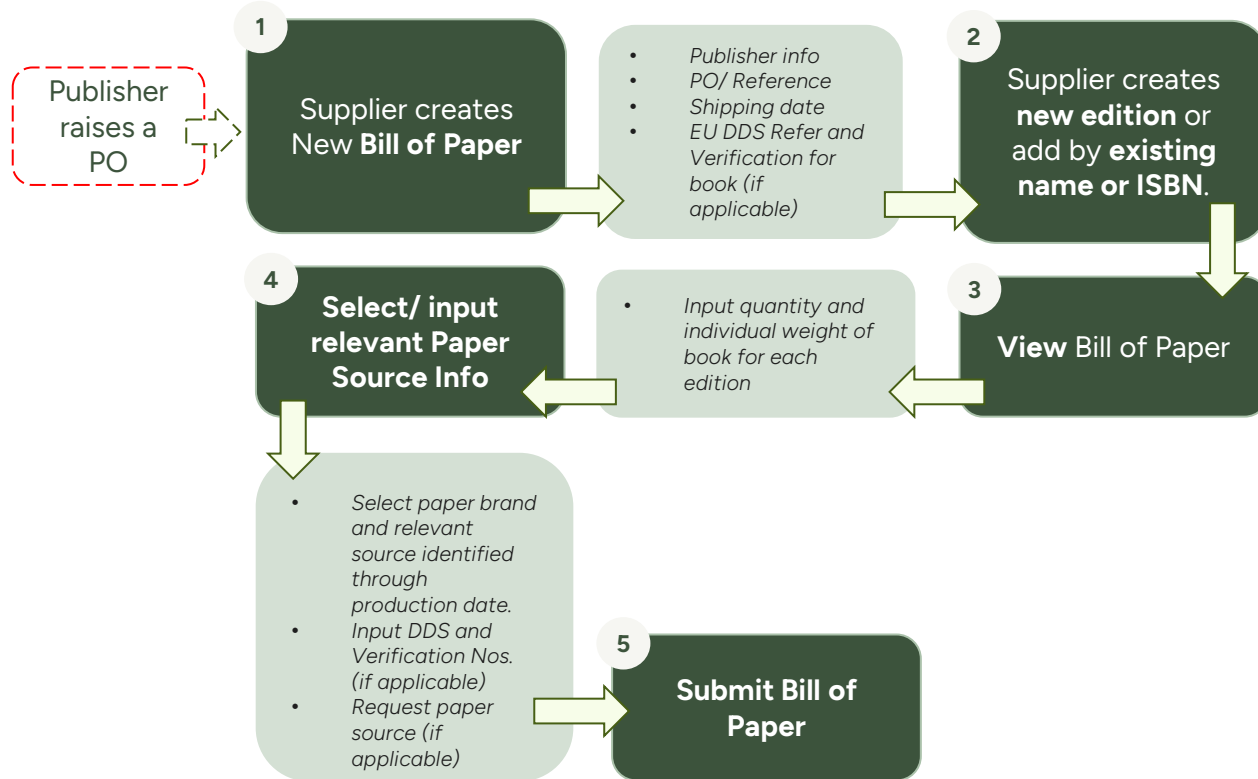
Suppliers and publishers can use the BCP risk assessment and due diligence process to **comply with EUDR**



Streamlined process for suppliers to **share EUDR information with customers**

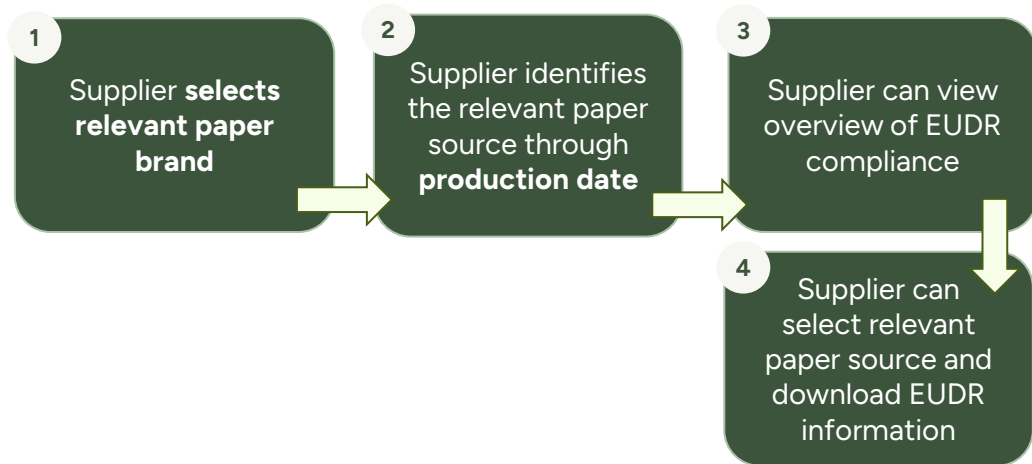
# Overview of Actions: Suppliers

## Creation of a Bill of Paper



# Overview of Actions: Suppliers

## View EUDR Assessment Results



# Supplier System Demo: Bill of Paper



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## Supplier

Name EUDR Test Supplier ✱

Supplier Group EUDR Test Supplier Group ✱

Country United Kingdom ●●●●●●

SME ⓘ --

## Status

✓ Forest Sourcing + EUDR ✱ Chemicals & Materials ✓ Labour & Environment

Created 30 Jun 2025

Last Login 1 Sep 2025

## EUDR Survey

Please complete and submit this survey on EUDR.

Complete Survey

## Services ⓘ ⓘ

Printer ▲

Testing House

Warehouse ▼



# Supplier System Demo: EUDR Status Check



## Supplier

Name	EUDR Test Supplier *
Supplier Group	EUDR Test Supplier Group *
Country	United Kingdom ●●●●●●
SME ?	--

## EUDR Survey

Please complete and submit this survey on EUDR.

Complete Survey

## Status

✓ Forest Sourcing + EUDR ✗ Chemicals & Materials ✓ Labour & Environment

Created	30 Jun 2025
Last Login	1 Sep 2025

## Services [8] ?

Printer	▲
Testing House	
Warehouse	▼



# 3. Supply Chain Perspectives



# Suresh Lodgala

AGM Quality Assurance & Product Development  
Emami Paper Mills Limited





# Lisa Faratro

Director of Environment & Sustainability European Lead  
CPI Group

**CPI**



# 5. Call to Action





# Call to Action: Paper Mills

1

**Complete the Mill EUDR Readiness Survey on the BCP platform**

*We will be reporting to suppliers and publishers which mills are engaging with the Solution.*

2

**Begin uploading relevant EUDR information for paper brands as soon as possible**

*This will enable you to familiarise yourself with the system and its functionality.*

3

**Engage with your customers**

*Inform your customers that you will be sharing information via the BCP EUDR Solution and leveraging the risk assessment.*



# Call to Action: Suppliers

1

## Complete the **Supplier EUDR Readiness Survey** on the BCP platform

*We will be reporting to publishers which suppliers are engaging with the Solution.  
We will be in touch with suppliers who do not yet have a subscription to forest sources.*

2

## Engage with your paper suppliers

*Inform your paper suppliers that you will be engaging with the BCP EUDR Solution and encourage them to engage.*

3

## Begin to **explore the system and Bill of Paper function**

*This will enable you to familiarise yourself with the system and give you time to prepare for compliance.*



# QUESTIONS?

# Q&A

**Q:** Risk based approach - if the pulp is with DDS, does this means the paper mill does not need to supply the geolocation and pulp info to us, the printer?

**A:** *Yes, following guidance from the European Commission, the only data sharing obligation for operators is the DDS reference and verification number, and not the raw data contained within it.*

**Q:** Does the system allow raw materials with DDS to be mixed with raw materials without DDS? I am mainly referring to raw materials purchased before December 2025.

**A:** *Yes, a mill can input all pulps that are contained within a paper course, with the option to provide a DDS where applicable.*

**Q:** How can there be a situation, where a Paper Mill does not have a DDS for previous processes? There are only a few Paper Mills in EU, who are producing their own pulp. Others are buying from paper pulp producers, thus - with valid DDS (Ref.Nrs and Ver. Nrs.).

**A:** *Paper mills located outside of the EU that are using non-European sources will likely not have a DDS for the pulp/ paper. The DDS is only created when importing into, placing on, or exporting from the EU.*

**Q:** How does BCP help with paper produced in the transition period?

**A:** *The system requires a mill to input the time period for the validity of sources, and this will enable the identification of any paper produced during the transition period of the data is provided by the mill.*

# Q&A

**Q:** Being a printing company in Asia with factories in Hong Kong and China. We export books to EU clients on an FOB basis from Hong Kong or China, where our clients typically handle import clearance and place the books on the EU market. Under the EU Deforestation Regulation (EUDR), could you clarify if we, as a non-EU supplier, are required to submit a Due Diligence Statement (DDS) in TRACES NT? Or is our responsibility limited to providing supporting data (e.g., geolocation coordinates, paper certifications) to our EU clients, who act as Operators?

**A:** *The importer of record will be considered to be the operator and therefore responsible for submitting the DDS into TRACES NT. Actors upstream will be required to share all relevant EUDR information.*

**Q:** What is the role of FSC with respect to EUDR or BCP? does it help to get EUDR certification?

**A:** *Certification is a useful due diligence tool, however it is not considered by the EC as a green lane for compliance. Certified sources will be treated the same as non-certified sources within the risk assessment to allow for the additional level of due diligence required by the regulation.*

**Q:** Would a bill of paper need to be produced at individual reel level due to mixing of production dates in the supply chain?

**A:** *The Bill of Paper allows you to select specific brands/ paper sources, based on the production date of the paper contained within the print run.*



# Q&A

**Q:** Your solution seems to be (only) directed to book publishing. What about commercial print?

**A:** *The development of the solution was supported by the book and journal publishers referenced in this slide deck.*

**Q:** Are mills going to be at a disadvantage with publishers not using this platform if they have their own way of distributing this information and need to avoid duplication of work?

**A:** *Unfortunately, there is fragmentation in the systems being used to share data (own or third-party) and so there will inevitably be some level of duplication. However, the BCP EUDR solution is not only a data sharing platform, but mills can also benefit from the risk assessment element to support their own due diligence.*

**Q:** Is your system language available in Chinese or other languages..? Traditional Chinese & Simplified Chinese..?

**A:** *The BCP system is only available in English.*

**Q:** How about integration and automatic uploading in printers ERP-systems?

**A:** *There are no current plans to integrate with printer ERP systems.*

# Q&A

**Q:** What if our customers (publishers) have appointed other third-party platforms. Can your information be shared to other third-party platform by API link?

**A:** *No, there are no plans to establish an API link with third-party platforms. However, we are exploring the establishment of an API link with publishers' order management systems (e.g. Biblio), to enable the automated flow of data, however there are no guarantees of this feature at this stage.*

**Q:** We have designed our DDS not on production time / day, but rather on sales order level - how to handle this?

**A:** *Products included within a PO would be linked to reel and so even if the DDS is at sales order level, you should be able to identify the production dates from that.*

**Q:** Will there be a way to import/upload on mass this information from the printer rather than manually using the web interface?

**A:** *Yes, you can bulk create bill of papers/ bulk upload using an excel template and also extract multiple paper source and Bill of Paper in one go in the system.*

**Q:** Which options does BCP offer to automate uploads of DDS/RN and linking it with paper brands?

**A:** *We currently don't have automatic uploads of DDS information into BCP. However, we are currently exploring the possibility of establishing an API link with EU TRACES.*

# Q&A

**Q:** Does forest sources still need to be maintained despite sharing DDS/ RN numbers?

**A:** *We are continuing to operate an EUDR process and standard paper grading process in parallel. We will continue to request the annual upload of paper sources for grading. There is functionality to base this submission upon data provided for EUDR purposes so there is no duplication of effort.*

**Q:** If there is no existing DDS, once the legality / geolocation data is input and checked what is the process to get a DDS?

**A:** *The process would be to combine the information in a Bill of Paper and extract the information for submission to TRACES to generate the DDS reference number. We are currently investigating whether we can automate that process, however we are unable to guarantee that this will be possible.*

**Q:** What is the price of the Forest Sourcing subscription?

**A:** *We are currently updating the workplan and annual subscription fee for printers. If interested, please reach out to the Book Chain team who would be happy to help: [info@bookchainproject.com](mailto:info@bookchainproject.com)*

**Q:** From my understanding, most of the publishers that joined BCP are UK-based. Since our EU publishing partners have not adopted BCP, could you advise how we, as a China printer, should proceed in this situation?

**A:** *Most engaged publishers are US or UK based. We recommend sharing information about the BCP platform with your customers and inform them that you plan to use the system to conduct your due diligence process. The BCP team are happy to set up an introductory call with anyone.*

# Q&A

**Q:** For non-EU paper mills who are supplying 100% recycled paper, which should be exempt, will they be able to submit this data as well?

**A:** *Yes, you can submit and record the material you are using is recycled and this will be exempt for EUDR risk assessment.*

**Q:** Can the Bill of Paper be shared with publisher clients who are not signed up to BCP?

**A:** *Information from the BCP platform can only be shared with publishers through the BCP platform, it should not be downloaded and shared offline, as per our terms of use. That said, you can share that you are using the BCP solution, however you would be unable to share any data from BCP.*

**Q:** What is the role of FSC with respect to EUDR or BCP? does it help to get EUDR certification? Does this make FSC and PEFC obsolete?

**A:** *Certification is a useful due diligence tool, however it is not a green lane for compliance. Certified sources will be treated the same as non-certified sources within the risk assessment to allow for the additional level of due diligence required by the regulation.*



Making  
Sustainability  
Happen