



Per-block record

# Harvest or Conversion

for wood under **EUDR**

A per-block record that tells a harvest from a conversion on the same cleared canopy, with two rounds of pre-registered controls published whether the gates passed or failed.



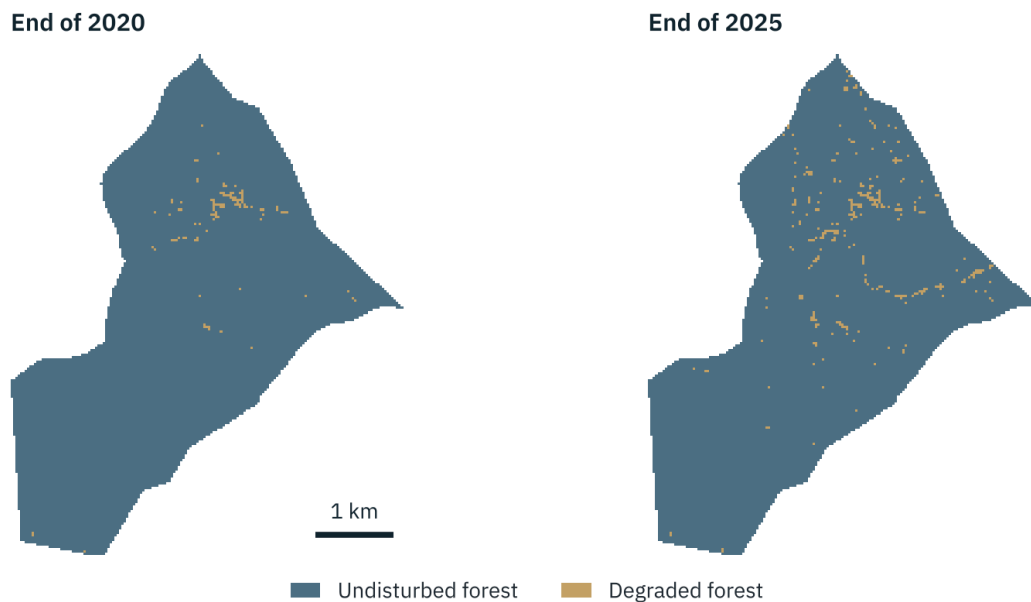
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# Introduction



Regulation (EU) 2023/1115 asks of wood whether the harvest left the forest standing. This paper describes the per-block record we built to answer that from public archives, the two rounds of pre-registered controls we ran against it, and the shipment report it feeds.



**Figure 1.** A Cameroon annual cutting area (Forest Atlas block CM-AAC-1007-5-1, harvest window 2021) read at the end of 2020 and the end of 2025. Degraded forest is 0.67 percent of the block in 2020 and 1.92 percent in 2025. The block is drawn in local pixel space with a 1 km scale bar and no coordinates.

## Motivation: harvest and conversion look alike from orbit

A tree crop is judged by what the land was at the cutoff. Wood comes out of forest by design, so almost every harvest block was forest on 31 December 2020, and the Regulation asks a second question of it: whether the harvest left forest that is still forest of the same kind, or ground that now serves another use. Article 2(13) gives wood a two-part definition of "deforestation-free", and the second part concerns forest degradation that the harvest itself induces.<sup>1</sup>

Public loss maps do not answer that question. A loss pixel marks a canopy fall and says nothing about what follows it, so a selective harvest and a clear-felled conversion are recorded in the same way. The scale of the problem is large. The FAO's Global Forest Resources Assessment 2025 puts forest cover at 4.14 billion hectares and deforestation at 10.9 million hectares a year in 2015 to 2025, down from 17.6 million in 1990 to 2000.<sup>2</sup> Global Forest Watch reports 25.5 million hectares of global tree cover loss in 2025, of which 4.3 million hectares was tropical primary forest, 36 percent below the record

6.7 million hectares of 2024.<sup>3</sup> Fire was the leading cause of tropical primary forest loss in 2024, accounting for nearly half of it.<sup>4</sup> A hectare count of loss therefore mixes harvest, fire, conversion and storm.

The European market is exposed to all of it. The Stockholm Environment Institute, using Trase data, attributes 16 percent of tropical deforestation associated with international trade to the EU in 2017, 203,000 hectares, and ranks wood products after soy, palm oil and beef among the commodities with the largest embedded tropical deforestation imported into the EU for 2005 to 2017.<sup>5</sup> The ITTO counts 1,608,800 tonnes of tropical wood and wood furniture imported by the EU in 2025, 10 percent more than in 2024.<sup>6</sup> Our record is built for the first placer who has to show, block by block, which of those cleared canopies were harvests.

- + **A loss alert has no cause.** It dates a canopy fall. Roads, log landings, selective harvest, fire and conversion all produce one.
- + **The Regulation names a forest type.** Article 2(7) turns on primary or naturally regenerating forest becoming plantation forest or other wooded land, which a tree-cover map cannot show.
- + **The newest clearing is the least visible.** The Landsat record needs time to show whether a disturbance closes again, and a clearing made after its last mapped year is not yet dated.



*A stack of cut round logs in a misty clearing, with tall conifers at either side.*

We publish the record with its controls. Round one failed its safety gate, four of 25 conversion controls received a finding, and we report that failure in full below next to the round two result on a held-out set, where both gates passed.

# What the Regulation Asks of Wood



*Two limbs, one cutoff, and a duty that sits with the company that first places the wood on the Union market.*

Article 2(13) of Regulation (EU) 2023/1115 defines "deforestation-free" in two parts. The first applies to every commodity: the product was produced on land not subject to deforestation after 31 December 2020, deforestation being the conversion of forest to agricultural use (Article 2(3)). The second applies to wood alone: the wood was harvested from the forest without inducing forest degradation after the same date. Article 2(7) defines forest degradation as structural changes to forest cover taking the form of the conversion of primary forest or naturally regenerating forest into plantation forest or into other wooded land, or of primary forest into planted forest.<sup>1</sup>

| Limb                       | Question for a harvest block                                                                               | Reading                                                                                          |
|----------------------------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Land use (Article 2(3))    | Was the block turned to agricultural use after 31 December 2020?                                           | Forest at the cutoff, and a compact clearing of it afterward that is not a road or a log landing |
| Degradation (Article 2(7)) | Did the harvest turn primary or naturally regenerating forest into plantation forest or other wooded land? | Forest type in the Commission's 2020 maps, compared with what stands on the block now            |

The Commission's FAQ (version 5, April 2026, questions 4.3 to 4.9) confirms that wood must satisfy both limbs, that different levels of harvesting are allowed provided they do not amount to degradation, that degradation not induced by harvest (fire, disease, storm) does not disqualify the wood, and that conversion to a road or another non-agricultural use is not deforestation.<sup>7</sup> A harvest block, whether a cutting block or a forest management unit, is therefore read for a narrower change than a tree-crop plot. Almost all of them were forest at the cutoff. The question is whether each is still forest, of the same kind, after the harvest that produced the shipment.

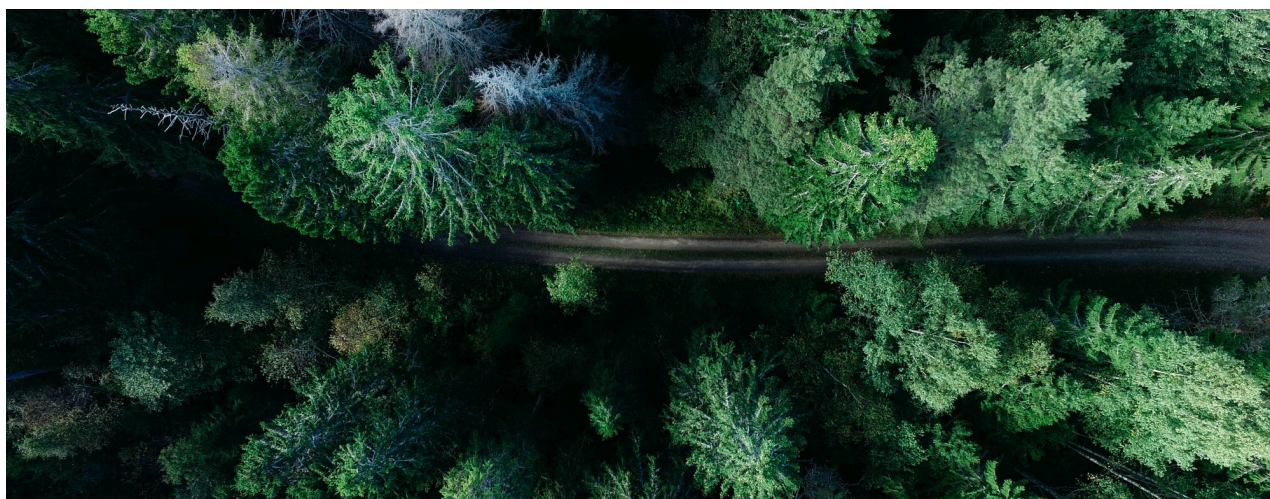
## Who carries the duty

Under Regulation (EU) 2025/2650 a downstream operator or trader submits no due diligence statement of its own. It keeps supplier information and the reference numbers of the statements it receives for five years.<sup>8</sup> The duty to exercise due diligence sits with the first placer, the company that brings the wood onto the EU market for the first time, whether as an importer or as a manufacturer importing it directly. The Regulation applies to large and medium operators from 30 December 2026 and to micro and small operators from 30 June 2027, with micro and small operators already covered by the EU Timber Regulation applying from 30 December 2026.<sup>8</sup> The Commission's simplification review of 4 May 2026 estimates about 275,000 unique importing operators under the revised scope,

down from 352,000, with annual compliance cost falling by about 75 percent, from EUR 8.1 billion to EUR 2.0 billion.<sup>9</sup> Article 25 sets the maximum fine for a company at no less than 4 percent of its annual Union-wide turnover.<sup>1</sup>

## Country risk

The Commission's 2025 country benchmarking (Implementing Regulation (EU) 2025/1093 of 22 May 2025, in force since 26 May 2025) rates each country of harvest low, standard or high risk and sets what Article 10 and Article 11 ask of the first placer.<sup>10</sup> Gabon and the Republic of the Congo, both significant tropical sawnwood origins for the EU, are rated low risk. Brazil, Cameroon, Indonesia and Malaysia, the four countries our controls cover, are standard risk under the residual rule of Article 1(2): the Commission names them as neither low nor high, so the full duty applies. ITTO data show what the volumes behind that look like. EU27 tropical sawnwood imports in January to September 2025 came to 179.1 thousand cubic metres from Cameroon, 95.9 from Gabon, 45.9 from the Congo and 12.8 from Ghana.<sup>11</sup> A first placer importing from any of the four standard-risk countries has a due diligence duty the Regulation does not relax, and the record meets it at the place a loss alert cannot: telling a harvest from a conversion on the same cleared canopy.



*A narrow dark track crossing a dense conifer stand, seen from directly above.*

## Why This Is Hard



*Four obstacles stand between a public archive and a statement about one harvest block.*

### **A loss pixel has no cause**

Tree cover loss layers such as the UMD/GLAD product record that a canopy fell between two dates.<sup>12</sup> A selective harvest opens the canopy, builds roads and landings, and then closes again as crowns regrow. A conversion opens it and keeps it open. The Landsat-based tropical moist forest record handles this by class: a disturbance that heals is degradation, one that persists is deforestation, and cleared ground that grows back is regrowth.<sup>13</sup> That distinction takes years to resolve, which is the second obstacle.

### **The newest years are unsettled**

The Landsat record's last mapped year has no later years against which to test whether a disturbance closes. A clearing made in that year, or after it, reads as a harvest that has not yet healed or as nothing at all. Optical looks from Sentinel-2 are the only public source fresh enough to catch it, and the tropics limit them. Flores-Anderson and colleagues report a median of about 12 cloud-free observations a year over tropical forests in 2017 to 2018 and about 40 a year in 2019 to 2021.<sup>14</sup> Round one of our controls failed on exactly this ground, and round two's rule was built around it.

### **Forest type is a map, and maps disagree**

The Commission's own 2020 forest maps are the reference for what counted as forest at the cutoff.<sup>15</sup> Version 3 of the forest cover map reports 92.8 percent overall accuracy and a 13.1 percent commission error.<sup>16</sup> Version 4 is the current release, and its accuracy report is expected by December 2026, so we quote no accuracy figure for it. Where a moist-forest record and the Commission's map disagree about the same ground, as they do on the cerrado-transition edge of the legal Amazon, a reader has two forest definitions and no arbiter.

### **Labels are documents, and documents are imperfect**

A control needs a label that does not come from the record under test. A loss layer alone is a poor source of conversion labels: three of round one's four false findings were controls labelled from a loss map that counts logging roads and skid trails as conversion. Authorities are also testing records already. Satelligence reports that in the Dutch authority's latest round of dry runs only two of ten companies passed the full audit.<sup>17</sup>

## Data



Three public archives, each serving a different part of the Regulation's own question, and nothing proprietary.

- + **JRC Tropical Moist Forest (TMF), version v1\_2025.** Landsat, 1990 to 2025, 30 m, pan-tropical, described by Vancutsem and colleagues in *Science Advances*.<sup>13</sup> Separating a canopy disturbance that closes again, such as selective logging, fire or wind, from one that persists is what this product was built to do. A disturbance that heals is degradation in the product's own sense, one that does not is deforestation, cleared ground that grows back is regrowth, and a transition map carries the product's own tree plantation classes. It is free of charge without restriction of use, and we acknowledge the journal article and the JRC on every record. We read it from a public re-packaging of the JRC's own tiles on source.coop whose publisher states the pixel values are unchanged. The JRC's own download endpoint ignores HTTP byte-range requests, so reading one block from the JRC directly means pulling an entire 10-degree tile.
- + **The Commission's 2020 forest maps.** The Global map of forest types 2020, version 1, at 10 m, separates primary, naturally regenerating and planted forest.<sup>18</sup> The Global map of forest cover 2020, version 4, is the Commission's own reference for what counted as forest at the cutoff.<sup>19</sup> Both are released under CC BY 4.0 under the Copernicus Regulation.
- + **Sentinel-2.** The newest cloud-free optical looks over ground the Landsat record still calls forest. The Landsat record's last mapped year is in the past by the time a block is read, and reading the freshest looks over exactly the canopy the record has not yet dated a change on is how a clearing made after that year is caught at all.

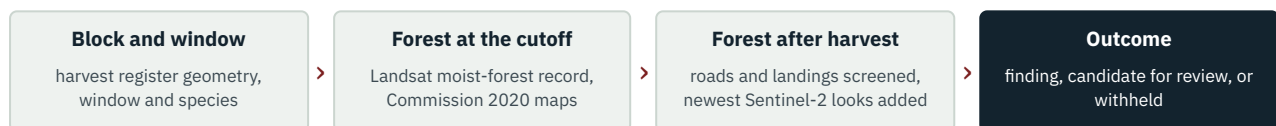
Two further layers travel with the record as supporting evidence and change nothing in it on their own. The WRI and Google DeepMind drivers of tree cover loss at 1 km are read against a block to name a plausible cause for clearing the record has already found, and are not used to find clearing.<sup>20</sup> For Indonesian ground, the Global Forest Watch licensed industrial pulpwood concession layer is read so that a plantation stand inside a licensed concession is reported as what it is and does not read as unexplained clearing.<sup>21</sup>

## The Block Record



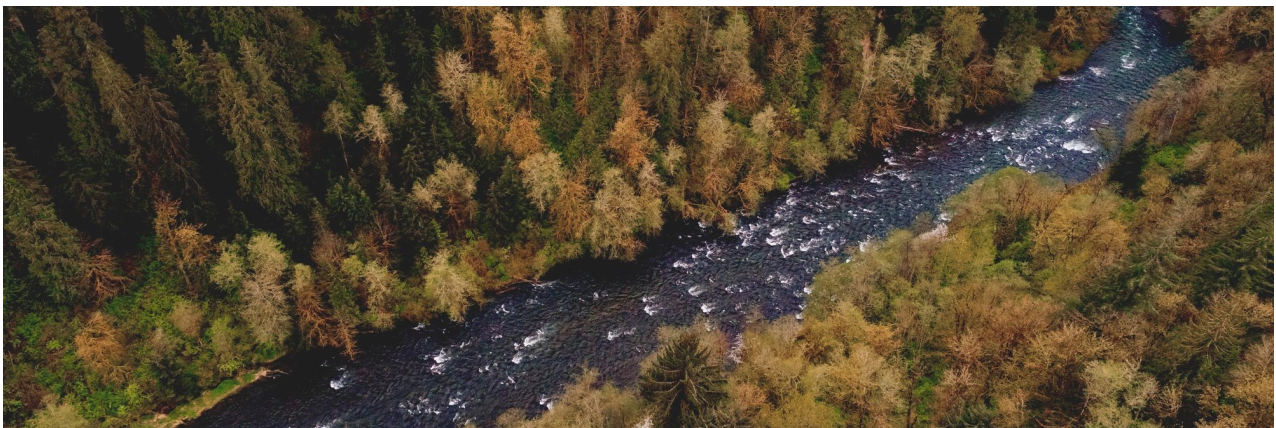
*One record per harvest block, three possible outcomes, and no numeric thresholds in the filed document.*

A harvest block, a cutting block, an annual cutting area or a forest management unit is a plot of the register that carries the window it was harvested in and the species harvested. Its record reads the Landsat moist-forest record and the Commission's 2020 maps over the block and asks whether the block was forest at the cutoff. It then asks what became of that forest after the harvest window closed. Either the forest stayed forest, or it closed again after a disturbance the record calls degradation, which is the pattern a selective harvest leaves, or some of it cleared in a way that survives the check for roads and log landings, which the Regulation does not count as deforestation, and stayed cleared. Where the Landsat record's most recent years have not yet had time to show whether a disturbance closes again, the newest Sentinel-2 looks are read over exactly that canopy.



**Figure 2.** *From a registered block to one of three outcomes.*

The block record carries what was measured and the outcome it produced. It does not carry the numeric lines the outcome was taken against. Those lines are the operating point of our service and move as controls accumulate, so a filed document quoting one would be wrong the day it moved.



*A narrow rocky river with white rapids running through a forest of orange and brown broadleaf crowns and dark conifers, seen from directly above.*

## Three outcomes

A tree-crop record issues a finding or withholds one. A harvest block has a third outcome, a candidate for review. A harvest block that cleared is not automatically a compliance failure under Article 9(1)(d). It may be a mining lease, an agricultural encroachment or a genuine conversion inside the same management unit. The record says where to look, and the operator adjudicates what the clearing was for.

| Outcome              | What it means                            | When it is reached                                                                                                                                                                                                                          |
|----------------------|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Finding              | Forest retained after harvest            | Forest at the cutoff, with no clearing of it afterward that survives the check for roads and landings                                                                                                                                       |
| Candidate for review | Compact clearing after the cutoff        | Forest at the cutoff, with clearing of it afterward that is not a road or a log landing, whether the Landsat record dates it or the newest Sentinel-2 looks do                                                                              |
| Withheld             | The record does not speak to this ground | The block was not forest at the cutoff on the record, or it is a forest type (dry forest, open woodland) the moist-forest record does not follow even though the Commission's map calls it forest, or too little of the block could be read |

A review carries two supporting flags where they apply. One marks a block where most of the forest is primary or naturally regenerating and part of what cleared now reads as tree plantation, which is the Article 2(7) question stated directly. The other marks a block that intersects a licensed industrial pulpwood concession on Indonesia's own concession layer.

Figure 1 shows what a finding looks like on the ground. The Cameroonian annual cutting area is read as forest retained after harvest in both rounds of the controls. The forest the record calls undisturbed at the cutoff is still almost entirely forest at the record's own end, and the small share reading as degraded forest in 2025 is a canopy disturbance that has not persisted, the signature a selective harvest leaves.

## Controls, Round One and Round Two



*Labels come from documents and never from the record under test, and two gates were set before any block was read.*

### Where the labels come from

Harvest labels come from the regimes' own records: Cameroon's annual cutting areas in the Forest Atlas of the Ministry of Forests and Wildlife,<sup>22</sup> Brazilian federal concessions under contract with the Serviço Florestal Brasileiro,<sup>23</sup> Malaysia's Deramakot and Anap Muput forest management units, and Indonesia's natural-forest logging licences.<sup>21</sup> Conversion labels come from an independent determination that the ground was cleared for something other than harvest: the photo-interpreted PRODES clear-cut polygons of Brazil's INPE,<sup>24</sup> and, elsewhere, 4 km square boxes placed on UMD/GLAD tree-cover loss inside documented plantation, mining or agricultural licences.<sup>12</sup> A box was kept only after a human reader confirmed forest in 2020 and cleared or planted ground replacing it by 2025 or 2026 on Sentinel-2 true-colour scenes.

Two gates were set before any block was read. The safety gate says no conversion control may receive a finding, and one is a failure of the gate. The usefulness gate says most harvest controls must receive a finding.

|                                                   |                                                                |                                                             |                                                          |
|---------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------|
| <b>86</b>                                         | <b>0 of 18</b>                                                 | <b>19 of 19</b>                                             | <b>4 of 25</b>                                           |
| control blocks read under the rule now in service | fresh conversion controls that received a finding in round two | fresh harvest controls that received a finding in round two | conversion controls that received a finding in round one |

### Round one

Round one read 49 blocks, 24 harvest and 25 conversion, against the frozen rule.

| Gate               | Result | Count                                                     |
|--------------------|--------|-----------------------------------------------------------|
| Gate 2, usefulness | Passed | 21 of 24 harvest controls (88 percent) received a finding |
| Gate 1, safety     | Failed | 4 of 25 conversion controls wrongly received a finding    |

We looked at every disagreement between a label and the record on Sentinel-2 true-colour scenes from 2019 to 2020 and from 2025 to 2026, and against the WRI and Google DeepMind drivers map, a determination independent of the record under test.

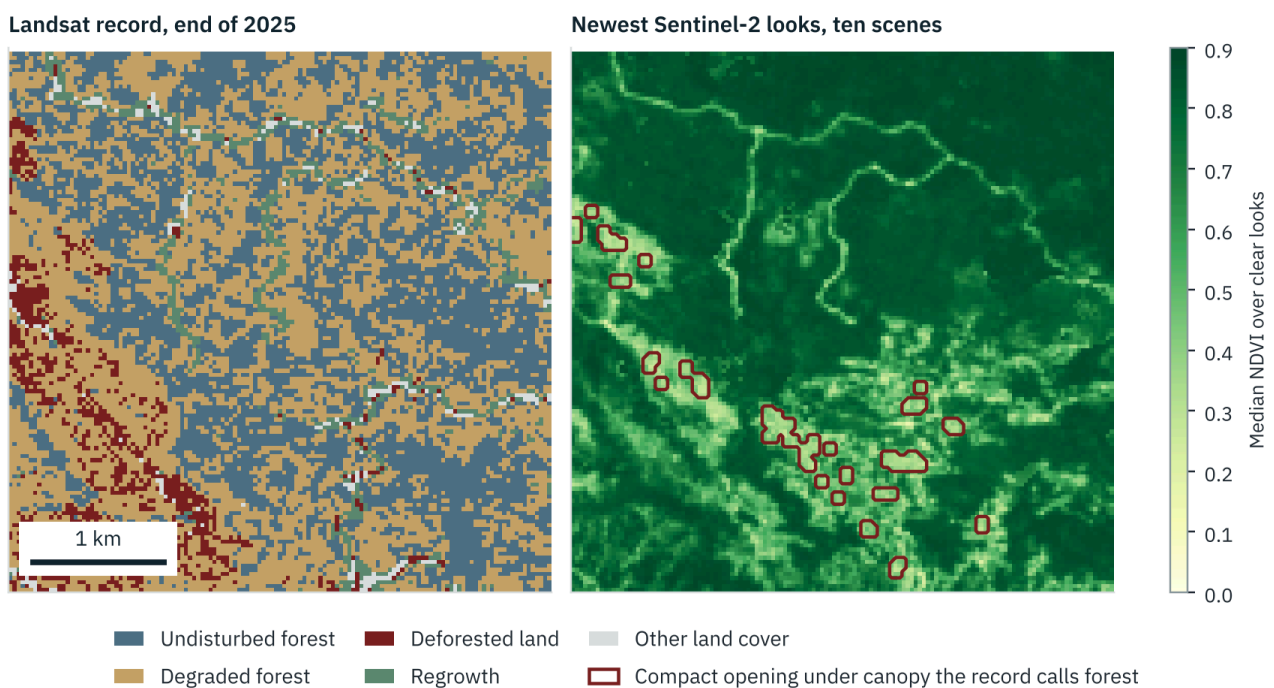
| Block                             | Label      | Record   | What the independent check showed                                                                                                                                                                                                                                                                                              | Whose error                                                                                |
|-----------------------------------|------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Sarawak oil palm box              | conversion | finding  | A clearing of several hundred hectares visible on the 2025 scene, forest in 2020. The record's most recent years had not yet had time to say whether the disturbance would close again, so round one's rule treated it as a harvest that had healed                                                                            | The method's                                                                               |
| Malaysia licence 0011, box 1      | conversion | finding  | A clearing present before the cutoff that had regrown by 2026, logging roads, and a new clearing at the edge of the box after the record's span. Drivers map: all post-cutoff loss is logging                                                                                                                                  | The label's, for the window the record covers; the 2026 clearing sits outside it           |
| Malaysia licence 0011, box 2      | conversion | finding  | Forest crossed by new logging roads and skid trails, with no cleared block. Drivers map: logging, not conversion                                                                                                                                                                                                               | The label's: the loss map that placed the control counts logging as loss                   |
| Malaysia licence 0006, box 1      | conversion | finding  | Forest with logging roads on both dates. Drivers map: logging                                                                                                                                                                                                                                                                  | The label's                                                                                |
| Brazil concession Saracá unit IA  | harvest    | review   | New bauxite mining plateaus opened inside the unit. Drivers map: hard commodities                                                                                                                                                                                                                                              | The label's: the unit carries mining as well as harvest, and the record names it correctly |
| Brazil concession Jamari unit III | harvest    | review   | A cassiterite mining pit enlarged inside the unit. Drivers map: hard commodities                                                                                                                                                                                                                                               | The label's                                                                                |
| Brazil concession Jacundá unit I  | harvest    | review   | A compact clearing in one patch, with cloud over it on the most recent scene. Drivers map: permanent agriculture                                                                                                                                                                                                               | Most likely the label's; not confirmed on a scene                                          |
| Brazil PRODES box, Pará 2021      | conversion | withheld | The record classes less than a third of the box as forest at the cutoff: the PRODES year label runs from August, and most of this clearing happened before the cutoff. Clearing after the cutoff was recorded but not named, because round one withheld a block below the forest-share line before looking for clearing at all | The rule's ordering. Not a finding, so gate 1 is not touched                               |

Of the four conversion controls that received a finding, one is a real clearing the method missed because it happened too recently for the record to say whether it would heal. Three were labelled from a loss map that counts dispersed logging roads and skid trails as conversion. That second fact does not rescue the gate. We set the gate on the labels as they stood, and it failed.

## What changed

We made three changes, each aimed at exactly one of round one's failures. The record's most recent years are now held as provisional, so a disturbance dated that recently is never read as a harvest that has already closed again. The newest Sentinel-2 looks are read over canopy the record still calls forest, which catches a clearing made after the record's last mapped year. A block under the forest-share line with clearing after the cutoff is now named a candidate for review before that line is applied, where round one withheld it without a look at what cleared. Nothing else in the rule moved.

We read round one's 49 blocks again with the new rule, in sample. We changed the rule after looking at them, so we report this reading and do not score it as a gate result. Three of round one's four false findings move to review. The Sarawak box and Malaysia licence 0011 box 1 now trigger on the newest Sentinel-2 looks finding compact open ground under canopy the Landsat record still calls forest, and Malaysia licence 0011 box 2 now triggers on the provisional treatment of the record's most recent years. Malaysia licence 0006 box 1 is still a finding. Its loss is dispersed logging roads and skid trails, with no compact patch at any date, and the newest Sentinel-2 look over it reads no compact opening either. No version of this rule reaches a loss pattern made of roads, so we class this as a labelling problem in the control, a loss map calling logging conversion, and see no defect in the record. Round one's own reading of the block found the same. Figure 3 shows what the newest-looks rule added for the clearest case, the Sarawak box.



**Figure 3.** The Sarawak false finding, and what the newest-looks rule added. Left: the Landsat record's classes at the end of 2025, the only reading round one's rule had for this ground. Right: median NDVI over clear looks from ten Sentinel-2 scenes (24 April to 24 September 2026), with 39.0 ha of compact openings under canopy the record calls forest outlined in red. Round one read this block as a harvest that had closed again, and round two's rule reads the clearing directly and moves it to review.

## Round two, on a fresh held-out set

We built a new set after the round two rule was fixed and read it for the first time against that rule. It holds 19 harvest controls: Cameroonian annual cutting areas assigned to 2023 to 2025, the recent harvests the new rule could most plausibly mistake for clearing, plus further boxes inside Deramakot, Anap Muput and four Indonesian natural-forest logging licences. It also holds 18 conversion controls: INPE PRODES clear-cut polygons dated 2024 across nine Brazilian states, plus five UMD/GLAD loss boxes in Malaysian, Indonesian and Cameroonian plantation licences. A human reader rejected twelve of seventeen candidate boxes on sight, most of them plantation already established by 2020 or logging roads with no cleared block, the same pattern round one found.

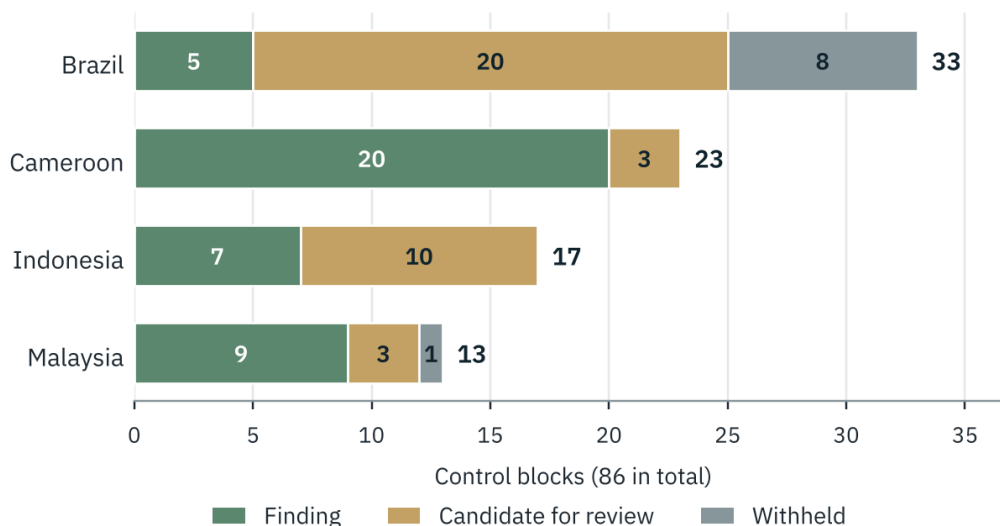
| Gate               | Result | Count                                                            |
|--------------------|--------|------------------------------------------------------------------|
| Gate 1, safety     | Passed | 0 of 18 fresh conversion controls received a finding             |
| Gate 2, usefulness | Passed | 19 of 19 (100 percent) fresh harvest controls received a finding |

Both pre-registered gates pass on a set the rule had never been shown before it was fixed. Nine of the eighteen fresh conversion controls came back withheld. The pre-registration asked us to report these and not to gate on them.

| Block or group                                                                                 | Code     | What it means                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Eight PRODES polygons (Mato Grosso, southern Rondônia, Tocantins and Maranhão: six; Pará: two) | withheld | Six sit on the cerrado-transition edge of the legal Amazon, where the Commission's forest-cover map calls the ground mostly forest and the moist-forest record does not follow that forest type at all. That is a disagreement about forest type and says nothing about clearing. Two Pará polygons disagree with both the Landsat record and the Commission's map about whether the ground was forest at the cutoff, a question for a third round that we have not resolved |
| Sarawak box 3                                                                                  | withheld | The record classes most of a 4 km square box as not forest at the cutoff, and the same box's review by eye called part of one corner forest in 2020. A conversion front centred inside a box this size reads mostly already cleared on an area-weighted record even where part of it still visibly carries forest. Both readings are correct about different things                                                                                                          |

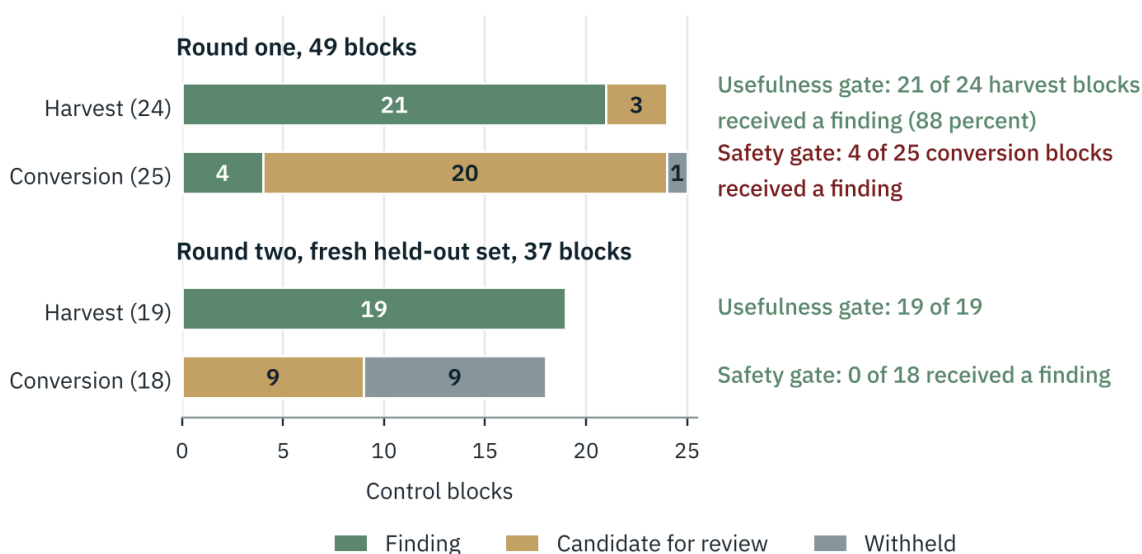
Every other fresh conversion control was named a candidate for review and none received a finding: four Indonesian and Malaysian boxes kept from the review by eye, and five Brazilian PRODES polygons outside the cerrado-transition states. One of them is a Kalimantan block whose Landsat-only clearing sits below the review line on its own and is named once the newest Sentinel-2 looks are added, which is the case that reading exists for.

Figure 4 places every control block read under the rule now in service by country and outcome: round one's 49, rescored, plus round two's 37 fresh blocks, 86 in total.



**Figure 4.** Control blocks by country and outcome, 86 in total. Brazil 33 (5 findings, 20 candidates for review, 8 withheld), Cameroon 23 (20, 3, 0), Indonesia 17 (7, 10, 0), Malaysia 13 (9, 3, 1). The campaigns' own geometries, named concessions, management units and PRODES polygons among them, are not published.

Figure 5 sets round one against round two's fresh set as a numerator over a denominator for each gate.



**Figure 5.** Round one's frozen rule against round two's rule, read for the first time on a fresh, held-out set. Round one: harvest 24 (21 findings, 3 reviews), conversion 25 (4 findings, 20 reviews, 1 withheld). Round two: harvest 19 (all findings), conversion 18 (9 reviews, 9 withheld). Green gate text marks a pass and red marks a failure.

## Limits and What Is Not Evaluated



*Where the controls are thin, and the one case neither round closes.*

### Brazil

No new federal concession boundary was found for round two's fresh set, so the harvest side of the Brazilian controls still rests on round one's eight management units alone. PRODES, Brazil's own photo-interpreted deforestation record, is the strongest conversion label we use anywhere. Six of the fresh Brazilian withholds sit on the cerrado-transition edge of the legal Amazon, a known boundary of the moist-forest product. The two withholds from core Amazon Pará disagree with both independent forest references about the ground's state at the cutoff, and we name that as a question for a third round.

### Malaysia and Indonesia

Outside Brazil the safety gate rests on a small set: five boxes kept from seventeen candidates after a human reader rejected most of them. The rejected ground was generally plantation or settlement by 2020, or showed logging roads and skid trails with no cleared block, the pattern behind three of round one's four false findings. A loss layer alone is not a usable source of conversion controls in these two countries without a human check against imagery.

### The one case neither round closes

Malaysia licence 0006 box 1, a tree plantation licence crossed by logging roads and skid trails on every date read, remains a finding in both rounds. No version of the rule reaches a loss pattern made of dispersed roads and no compact cleared patch. The independent drivers map confirmed that the control's label came from a loss layer that counts logging as conversion. The pattern recurred in round two's candidate pool before the review by eye removed it, and a method that reads for compact clearing will keep meeting it.

### Regional scope and what is not evaluated

We issue a finding or a review only in the four countries the controls cover: Brazil, Cameroon, Indonesia and Malaysia. A block of wood harvested anywhere else is read and reported with its sources and its readings stated, and with no finding. The record does not determine why a block cleared, whether the harvest was legal, how much wood left the block or whether the declared species grew there. A candidate for review marks ground to examine, and a withheld block carries the reason it was withheld. The control geometries stay unpublished, and so do the numeric lines behind the outcomes.

## How the Record Is Used



*The shipment report carries the record's sentence for every block behind a consignment.*

A shipment groups the harvest blocks, and any tree-crop plots, behind one consignment. Its report states what the record shows on every block drawn into it. The block table follows the order the EU's Information System asks for a wood consignment's fields.

| Order | Column             | What it carries                                                                                                                 |
|-------|--------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1     | Species declared   | Full scientific and common name of every species in the product                                                                 |
| 2     | Country of harvest | One of the four controlled countries, or a stated reading with no finding                                                       |
| 3     | Geolocation        | The block's own reference, standing for it as a producer's name stands for a tree-crop plot's geolocation on the statement page |
| 4     | Harvest window     | The window carried by the register                                                                                              |
| 5     | Supporting columns | Block type, the record's outcome, and the compact clearing read after the cutoff                                                |

Article 9(1)(a) and Annex II point 2 of the Regulation make the scientific name of every species in a wood product mandatory, checked against the EPPO list. The species declared on a shipment are what the report and the due diligence statement carry forward.<sup>1</sup>

### The sentence under each row

Under each row the report states the record's own sentence for that block. The sentence names the Landsat moist-forest record and the Commission's 2020 forest maps as what the record read. It also names the Regulation's two-part question for wood: that the land was not turned to agricultural use after the cutoff, and that the harvest did not turn primary or naturally regenerating forest into plantation forest or other wooded land, or primary forest into planted forest, after that date.

The report draws no conclusion beyond what the record shows. The determination under Article 10 stays with the operator who files the shipment.

# About Axine Laboratories

Axine Laboratories builds satellite spectral analytics for forestry, agriculture, water monitoring, energy and mining. The company is registered in the United States and run by a technical team of geologists and engineers.

Our approach rests on three commitments. Detection is physics-based and reproducible, derived from measured spectra and published formulations. Every published figure is backed by a pre-registered test against an independent reference, with the validation regime stated alongside it, and a result that fails its gate is published as failed. A plot or field the method cannot assess is reported as not evaluated, because a silent clear is the most expensive output a record can give.

Every record ships with the scenes, dates and parameters behind it, so a client can check any figure against the public archive it came from.

## Axine Laboratories

[axinelabs.com](http://axinelabs.com) | [contact@axinelabs.com](mailto:contact@axinelabs.com)

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