



# EUDR Requirements for the Cocoa Sector

## Essentials guide

### What is the EUDR?

The EU Deforestation-free Products Regulation (EUDR) is a legislation that concerns **all exports from and imports to the EU market** relating to the following **seven commodities: cattle, soy, palm oil, wood, coffee, cocoa, and natural rubber, as well as products derived from these commodities, such as leather, chocolate or furniture.**

The **operator**, i.e. the company placing these products on the EU market or exporting from it, are legally obliged to self-certify that the goods are not linked to deforestation and were produced in compliance with the national regulations in the production country (**the products are deforestation-free and legal**). To support their statement, operators **need to provide the exact geolocation of the production site** to EU authorities.

**For cocoa, the production site** refers to the plot of land where the cocoa was grown and also applies to chocolate, as a derived product.

The operators are further required to cross-check their compliance through a **due diligence process**. This means that they are expected to analyze their supply chain for compliance with regulatory standards (e.g. are labor rights exercised, i.e. do all employees have contracts at the farm). **Suppliers to the EU market are often not legally responsible under the EUDR**, since the import is conducted by their buyers. These suppliers may be approached by their buyers requesting data and documentation to show the deforestation-free and legal nature of their operations.

### Why is the EUDR important?

The EUDR is an environmental regulation with trade implications. It is a **market access requirement for the EU Market**, hence exporters/importers must ensure their products comply. Non-compliance could lead to confiscation of goods, fines or bans. Compliance with EUDR may also provide a **competitive advantage** when it comes to sustainable practices.

### When does it apply?

The regulation came into force on June 29, 2023 and **will be applied from December 30, 2025.**

### Commodities affected by EUDR



Palm oil



Rubber



Soybean



Cocoa



Timber



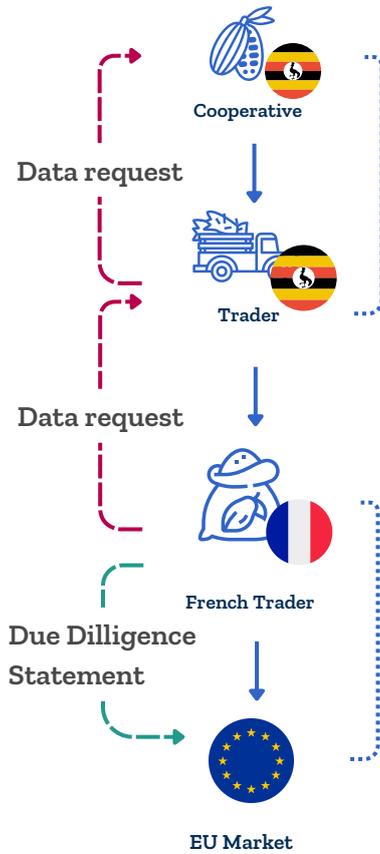
Cattle



Coffee

# EUDR requirements - Example from a cocoa value chain

A cocoa cooperative in Uganda sells cocoa beans to a local trader. The Ugandan trader sells the beans on to to a major cocoa trading company from France. The French trader then exports the cocoa beans to the EU, this means, they place them on the EU market.



For this scenario, **none of the entities based in the producer country, Uganda, the cooperative and local trader, have any obligations under the EUDR**, as they are not themselves placing products on the EU market.

The **French trader** is the owner of the cocoa beans before they enter the EU and exports them to the EU market (“places the products on the EU market”). Therefore, this company **qualifies as an operator** with the obligation to provide necessary data to the EU authorities upon import.

The **required data** includes the **geolocation of the production site** (the field or plantation) and a declaration confirming that due diligence has been conducted to ensure the products have been produced in a **deforestation-free and legally compliant manner**.

To fulfill this obligation, the **French trader will request relevant information from its supplier**, as key details regarding the origin of the cocoa beans and compliance with local regulations (in this case, Uganda’s national legal framework) originate from the primary producer, cooperative, and other supply chain actors.

## Practical steps around EUDR data requests

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### Understand EUDR Data Requirements

Identify the data needed for EUDR compliance, including product origin (geolocation), and production practices.



#### Company Information

**Producer Information:** Basic details about the farmer or cooperative, such as name or identifier (can be anonymized if needed).

**Product Details:** Information about the type, quantity, and harvesting date of the commodity.



#### Land plot

**Product Origin:** The location where the product was grown, including geolocation data (e.g., GPS coordinates or mapped boundaries).



#### Documents

**Supporting documentation on Legality:** Evidence that the production followed the national legality framework. For example official registration documents, certification or documented practices.

Selecting the methods and tools you will be using for data collection is important. Whilst doing so, try to keep in mind the following key considerations:

**Costs:** Clarify who pays (supplier, buyer, etc.).

**Interoperability:** Ensure EU system compatibility.

**Exportability:** Data in usable, compliant formats.

**Ownership:** Users control data with update/removal options.

**Confidentiality:** Secure hosting with flexible updates.

**Risk Mitigation:** Support due diligence needs.

## Fundamental data collection

Designed for users who prefer simple, manual data entry over complex IT systems.

### Data Management - EXCEL

<https://rb.gy/4mc2bc>

4	Group	Name	Type	id
5	Field name			
6	Data type	Text	Selection (Producer/Cooperative)	
	Field guidance	Name of the producer or cooperative	Select if this record represents a standard producer or a cooperative. Please refer to guidance or ask ITC if you need help deciding.	
7				
8	Your data goes here, please use one row per producer or cooperative		Producer	
9				
10				
11				
12				



You can use free tools like Excel or Google Sheets to manage and store your data on your computer, cloud, or phone. Recommended for users who prefer simple, manual data entry over complex IT systems.

### Geolocation Data - GEO JSON

<https://geojson.io>



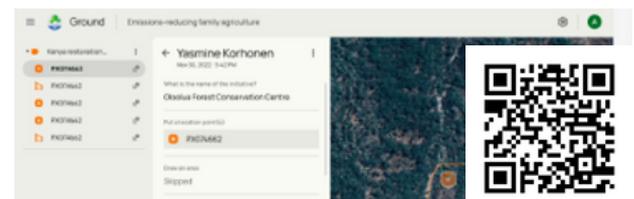
While producer or cooperative information can be added to Excel, collecting location-based data requires additional tools, such as using your phone for GPS coordinates or GEOJSON for polygon mapping, though GEOJSON often relies on satellite imagery and may need on-the-ground verification to ensure accurate boundaries. **Data can be transferred into the Excel / Google sheet for each plot.**

## Integrated data collection

Tailored for advanced users seeking data management solution with buyer connectivity.

### Data Management & Geolocation - Ground App

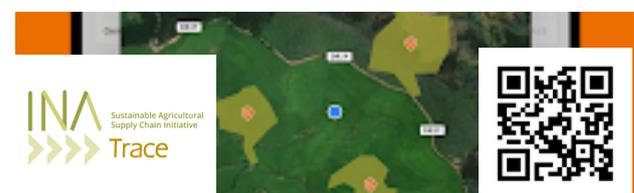
[openforis.org/solutions/ground/](https://openforis.org/solutions/ground/)



The FAO offers a free tool for managing farm data that works online and offline, collects geolocation data on the ground, and allows customization for additional information. Data can be exported to Excel, making it ideal for tech-savvy producers.

### Data Management & Geolocation - INATrace

<https://inatrace.org/en/>



INATrace is a **digital traceability solution for agricultural raw materials — from production to the final product.** INATrace software's source code is openly available, allowing IT companies and supply chain actors to adapt it according to their needs.

## 4 & 5 Manage Your Data & Connect With Buyers

Manage the data which you collected and gain visibility with buyers through the United Nations platform **ITC Deforestation-Free Trade Gateway** (DFTG). Data collected through the Excel template above can be imported in the DFTG easily, or data collected via the FAO ground App can be pushed to the DFTG.

The DFTG is a free web platform that helps producers collect, control, and share deforestation-free data, ensuring compliance with the EU Deforestation Regulation (EUDR).



Collect and manage data from multiple producers, ensuring it's compliant with EUDR standards and ready for international markets.



Get listed on the DFTG registry, making your cooperative more visible to EU buyers looking for deforestation-free products.



Assess your situation with a deforestation risk analysis



Conveniently export EU Information System (IS) compatible data

Access the Deforestation-free Trade Gateway at [dftg.intracen.org](https://dftg.intracen.org) or scan the QR Code :



The European Union (EU)- East African Community (EAC) MARKUP II funded by the EU, aims to enhance economic development in the EAC through sustainable intra-African and EU-Africa trade.

Focused on improving livelihoods, employment, and export competitiveness for MSMEs, the programme supports the development of key export-oriented value chains as well institutional support in the six MARKUP II EAC recipient partner countries. EU-EAC MARKUP II is promoting exports and investment through addressing trade barriers, value addition, quality compliance, trade facilitation and technology transfer.

EU-EAC MARKUP II is implemented by the International Trade Centre in collaboration with the EAC Secretariat and national partners in the recipient countries. Under the project, ITC supports EUDR preparedness in the cocoa, coffee and leather value chains. This guide was developed as part of these efforts.

More about the project:



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