



Addendum to the MARKUP II EUDR Training Handbooks

Based on latest 2025 EU FAQs & Guidance and Classification (April - May 2025)

1. Updated EUDR timeline

Large companies placing products on EU market: Deadline extended to 30 December 2025

SMEs placing products on EU market: New deadline is 30 June 2026

2. Uganda and Tanzania classified as “Standard Risk” (22 May 2025¹)

The EU has published its country benchmarking list. Tanzania and Uganda are classified as “standard risk.” What does this mean for these countries?

- EU buyers must still perform full due diligence on Tanzanian/Ugandan coffee.
 - This includes data collection, risk assessment, and risk mitigation steps.
 - There is no exemption or simplification as would apply to low-risk countries.
- ➔ Exporters should proactively support compliance by providing robust data and documentation to help EU operators reduce the perceived risk.

3. Burundi, Rwanda and Kenya Classified as “Low Risk”

The EU has published its country benchmarking list. Burundi, Rwanda and Kenya are classified as “low risk.” What does this mean for these countries?

- EU buyers are still required to submit a Due Diligence Statement (DDS), but they are exempt from conducting risk assessment and risk mitigation steps.
- Exporters only need to provide geolocation data (GPS coordinates of the production plot) and basic product information to their EU buyers.

¹ https://green-forum.ec.europa.eu/deforestation-regulation-implementation/eudr-cooperation-and-partnerships/country-classification-list_en

- This classification significantly simplifies the compliance process for exporters and EU buyers alike. It reflects the lower perceived deforestation risk in these countries. However, exporters should continue to maintain reliable and accurate data, especially on geolocation, to ensure smooth trade flows and reinforce trust with EU partners.

4. New clarity on geolocation requirements

Exporters must provide GPS coordinates for each plot where coffee is grown:

- < 4 hectares: One GPS point is enough.
- ≥ 4 hectares: You must map the full boundary as a polygon.

Use WGS84 format, ideally in GeoJSON.

4. Composite & bulk products still require traceability

Even for blends or bulk shipments, every batch must be traceable back to its origin. Mixing of compliant and non-compliant sources is not allowed.

5. EUDR: who is responsible? Clarified roles

Operators (EU importers placing the product on EU market) must submit DDS and do full due diligence.

SME traders only need to keep records.

Suppliers in producing countries are not legally obligated, but strongly encouraged to:

- Collect and share geolocation and legality data.
- Provide documentation supporting deforestation-free production.

6. Due Diligence Statement (DDS) flexibility

One DDS is needed per batch or consignment.

But: multiple shipments can be grouped under one DDS if the data is the same (same plot, product, origin, etc.).

7. Certificates can help, but are not enough

Certifications (like Rainforest Alliance, Fairtrade, Starbucks CAFÉ Practices or 4C) can support risk assessments. They do not replace the due diligence obligation.

8. Be ready for digital submissions

The EU has launched a central digital registry for DDS submissions.

Exporters should:

- Store data in digital formats.
- Prepare to share data quickly with EU buyers.
- Ensure traceability tools are interoperable.

9. What producers and exporters to EU should do now

- ✓ Finalize plot mapping and geolocation data.
- ✓ Prepare to respond to buyer due diligence requests.
- ✓ Engage with EU partners early – help them lower the risk rating of your supply.

- ✓ Stay updated via the ITC MARKUP portal and national coffee associations

Note: This addendum complements the November 2024 MARKUP EUDR Handbook. For full guidance, please consult the complete handbook or contact ITC Tanzania MARKUP support.