

EUDR Requirements for the Cocoa Sector

Essentials guide

What is the EUDR?

The EU Deforestation-free Products Regulation (EUDR) 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 applies to cocoa beans, shells, paste, butter, powder and 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 observance of regulatory standards (e.g. are labour rights exercised, i.e. do all employees have contracts at the farm). **Suppliers to the EU market are not legally responsible under the EUDR**, since the import is conducted by their buyers.

However, the suppliers will be approached by their buyers about production details 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**.

EUDR readiness may also provide a **competitive advantage** when it comes to sustainable practices required by new buyers.

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



Soya



Cocoa



Timber



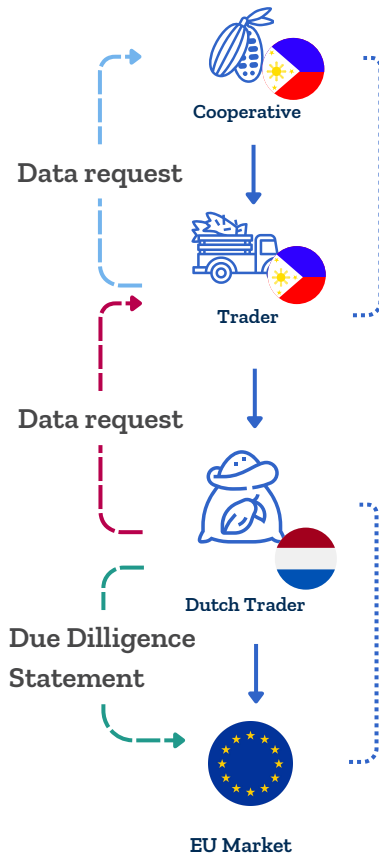
Cattle



Coffee

EUDR requirements - Example from a cocoa value chain

A cocoa cooperative in the Philippines sells cocoa beans to a local trader. The Filipino trader sells the beans on to to a major cocoa trading company from the Netherlands. The Dutch trader then exports the cocoa beans to the EU, this means, they place them on the EU market.



In this scenario, **none of the organizations in the Philippines, (including the cooperative and local trader) have obligations under the EUDR**, because they are not the ones selling products in the EU.

This means, the **Dutch trader** is considered an operator and must provide certain information to EU authorities when importing.

The **information needed** includes where the cocoa beans were grown , such as, the **geolocation of the production site** (the field or plantation) and a declaration confirming that checks have been conducted to ensure the beans have been produced in a **deforestation-free and legally compliant manner**. This is referred to as a due diligence process.

To meet this requirement, the Dutch **trader will need to ask its supplier for details** about where the cocoa beans came from and if they follow Philippine laws. Usually, this information comes from the original producers, cooperatives, and others involved in the supply chain.

Practical steps around EUDR data requests

1

Understand EUDR Data Requirements

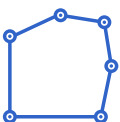
Identify the data needed for EUDR compliance, including product origin (geolocation), and production practices.



Company Information

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

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



Land plot

Product Origin: The geolocation 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.

2 & 3 Explore Compliance Tools & Data Collection

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

Cost responsibility: Identify 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.


Many tools are designed to EUDR requirements, below are selected publicly available options.

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	Text		
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		Producer	
9	here, please use			
10	one row per			
11	producer or			
12	cooperative			

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/



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.

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 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 or scan the QR Code :



The Climate Competitiveness Project

The International Trade Centre (ITC), implements the **Climate Competitiveness Project**, a project funded by the EU. The project works with a range of partner countries, including the Philippines, to strengthen engagement in the **discussions around trade and environment** issues at the World Trade Organization (WTO).

Based on an analysis of the role of trade in supporting climate change mitigation and adaptation objectives, it strengthens small business awareness around trade related climate measures and green transition market opportunities. The EUDR Guide was developed as part of this initiative.

More about the project:



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