

Thailand's

Policy Recommendations and Roadmap

for Due Diligence Readiness under European Union Deforestation Regulation (EUDR)
and Corporate Sustainability Due Diligence Directive (CSDDD)
Produced under the FIT for FAIR project.



This policy recommendation is developed under the "Enhancing readiness of Thailand to facilitate sustainable trade and alignment with EU Due Diligence Regulations" or FIT for FAIR (F4F) project.

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Project Framework & Methodology

Project Context

- Core Mandate: The FIT for FAIR project supports the co-creation of policy recommendations and enabling conditions for Thai businesses to effectively contribute to European operator' due diligence obligations under the EU Deforestation Regulation (EUDR) and the Corporate Sustainability Due Diligence Directive (CSDDD).

Significance and Objectives

- Main Goal: Establish a comprehensive national roadmap to prepare Thai farmers, smallholders, and exporters for evolving EU market expectations and European companies' due diligence requirements.
- Key Focus: Upgrade supply chain traceability, strengthen labor/human rights safeguards, and enhance environmental governance across critical sectors (rubber, timber, and oil palm) to maintain to maintain competitiveness in the EU market.



Participatory Policy Design Methodology

The roadmap was co-created through a multi-stage, 7-step systematic process involving inclusive stakeholder dialogue:

1. Status Quo Analysis: Evaluated existing laws and operational mechanisms, identifying data fragmentation, weak interoperability, and limited smallholder capacity as core structural challenges.
2. Kick-off Meeting: Conducted a systematic gap analysis to validate constraints across compliance channels and institutional coordination.
3. Thematic Working Groups: Held deep-dive workshops focusing on data standards, technology risks, labor vulnerabilities, and grievance systems.
4. Policy Lab Workshop: Applied systems thinking tools (e.g., Iceberg Model, Future Triangle) to shift from diagnosis to co-creating practical solutions via a mini policy canvas.
5. Policy Consultation: Engaged broader stakeholders to validate feasibility, assess business impacts, and refine practical application.
6. Policy Recommendations: Prioritized specific policy measures and explicitly mapped out designated lead agencies.
7. Due Diligence Roadmap: Synthesized actions into actionable short-, medium-, and long-term phases, highlighting recommendations to establish a national EUDR Single Window) and a dedicated business help desk.



Pillar 1

Digital Traceability Platform



Scaling National Digital Infrastructure

- **Eliminate Data Silos:** Build a unified national infrastructure to integrate fragmented government datasets and prevent institutional duplication.
- **Standardize Geolocation Data:** Mandate the use of GeoJSON format mapped strictly to the WGS84 global standard to verify plot boundaries and ensure deforestation-free compliance.
- **Centralize and Protect Data:** Securely integrate master maps and title deeds for risk assessments while ensuring strict compliance with the Personal Data Protection Act (PDPA) for smallholders.

Operational Governance Structure

- **Lead Authority:** The Ministry of Agriculture and Cooperatives (MOAC) handles upstream agricultural data collection and ongoing platform maintenance.
- **Central Coordinating Body:** Establish an executive governance mechanism acting as a National EUDR Single Window to facilitate inter-agency coordination and cross-system interoperability.
- **Key Supporting Anchors (By Strategic Function):**
 - **Land & Forest Governance:** Royal Forest Department (RFD), Department of National Parks (DNP), Department of Lands, and Agricultural Land Reform Office (ALRO).
 - **Smallholder & Crop Management:** Rubber Authority of Thailand (RAOT), Department of Agricultural Extension (DOAE), Department of Agriculture (DOA), and Department of Livestock Development (DLD).
 - **Processing & Labor Compliance:** Department of Industrial Works (DIW), Ministry of Labour (MOL), and Department of Labour Protection and Welfare (DLPW).
 - **Trade & Export Regulation:** Customs Department, Department of International Trade Promotion (DITP), and Department of Trade Negotiations (DTN).
 - **Digital Infrastructure & Technology:** Digital Government Development Agency (DGA), Government Data Center and Cloud service (GDCC), and GISTDA.

Pillar 2

Human Rights Due Diligence (HRDD)



HRDD Awareness and Knowledge Sharing

- Tailored Capacity Building: Develop sector-specific training toolkits covering labor rights, occupational health and safety, grievance mechanisms, and the eradication of forced/child labor.
- Inclusive Grassroots Outreach: Facilitate training via local agricultural extension channels, cooperative networks, and farmer field schools using multilingual and culturally appropriate materials.
- Lead Agencies: RAOT, Office of the Palm Oil Committee, and DOAE.

Agricultural Workforce Database & Registration System

- Centralized Workforce Visibility: Create a harmonized database covering informal, seasonal, migrant, and vulnerable workers on a voluntary basis under the "Do No Harm" principle.
- Professional Recognition: Establish a professional certification system for historically unrecognized roles (e.g., timber felling, chainsaw operating) to bridge them into voluntary social security (Section 40).
- Lead Agencies: MOAC and Ministry of Labour.





Strengthening Farmer Registration Systems

- **Database Interoperability:** Harmonize commodity-specific registries (e.g., RAOT, oil palm records, and RFD's e-Tree platform) with the centralized Farm Book registry managed by DOAE.
- **Tangible Incentives:** Drive registration through simplified digital/mobile procedures, offering preferred access to state subsidies, low-interest financing, and global certification support.
- **Annual Record Updates:** Enforce annual user notifications to update and verify plot boundaries (points/polygons), crop types, and production capacities to support operator due diligence.

Labor Protection Enforcement and Grievance Mechanisms

- **Risk-Based Inspection:** Increase targeted labor audits in high-risk zones (rubber, palm oil, and timber harvesting) focusing on subcontracting fees, document retention, and safe chemical/machinery handling.
- **Trusted Remedy Channels:** Promote accessible, confidential, and multilingual grievance channels (e.g., MOL Hotline 1506/1546 or civil society platforms like the Issara Worker Voice app) backed by non-retaliation safeguards.
- **Lead Agencies:** DLPW and the National Human Rights Commission of Thailand (NHRCT).



Pillar 3

Environmental Due Diligence & SME Readiness

Environmental Governance & SME Systems

- Green Industry Baseline: Encourage mid- and downstream processors (e.g., rubber smoking plants, palm oil mills) to achieve at least Green Industry Level 3 (GI3: Green System) as an internal operational foundation, while recognizing that EUDR/CSDDD compliance is not guaranteed by any certification scheme.
- Critical Caveat: Voluntarily obtaining green certifications (e.g., GAP, FSC, PEFC, RSPO, GI) serves strictly as supporting baseline evidence. Certification alone cannot be considered a substitute for legal due diligence obligations.
- SME One ID System: Leverage OSMEP's digital platform to register the 13,321 target SMEs across the furniture, timber, rubber, and oil palm sectors to unlock Business Development Service (BDS) funding and compliance aid.

Key Stakeholders & Governance

- Lead Agencies: Department of Industrial Works (DIW) and Office of Small and Medium Enterprises Promotion (OSMEP).
- Expected Outcomes:
 - Enhances SME readiness to process international due diligence queries.
 - Lowers operational compliance barriers while securing access to global green financing.



Pillar 4

Enhance Competency of Key Stakeholders



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Strategic Knowledge Integration

- Grassroots Digital Literacy: Implement localized, hands-on training to guide smallholders through farm registration, polygon geolocation mapping, and basic compliance data entry.
- Peer Mentorship Schemes: Deploy learning networks led by early adopters to build local community confidence, shift mindsets, and drive meaningful corporate compliance.
- Practical Documentation Skills: Provide hands-on training for suppliers and exporters on maintaining auditable records (e.g., supply chain maps, risk mitigation logs, and grievance resolution histories) to demonstrate "good-faith efforts".

Educational Governance Node

- Lead Agencies: MOAC (specifically the Department of Agriculture, Department of Agricultural Extension, and Rubber Authority of Thailand) along with the National Bureau of Agricultural Commodity and Food Standards (ACFS).



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Pillar 5

Data Repository & Supporting Platform

Unified Information Architecture

- Open-Access Policy Portal: Integrate existing research databases (e.g., eudrthai.com funded by ARDA) into a centralized national portal providing free public access to related environmental, forestry, and labor laws by 2026.
- Due Diligence Help Desk: Operationalize a hybrid (online + offline) advisory center offering direct troubleshooting on geospatial data (e.g., GFC2020), self-declaration templates, and compliance reporting.

Operations Management

- Lead Authority: National EUDR Committee in collaboration with the Big Data Institute (BDI).
- Strategic Outcome: Minimizes regulatory uncertainty, lowers documentation compliance costs, and accelerates private sector adoption.

Phased National Roadmap for Implementation

Timeline	Priority Areas & Core Activities	Expected Impact / Outcome
Short-Term (2026)	• Deploy national digital traceability platform using government 'One Map' system • Launch open-access legal repository and conduct documentation workshops • Scale Farm Book updates and multilingual public grievance hotlines.	Foundational systems are digitized. Smallholders accept the tools, reducing export compliance costs.
Medium-Term (2027–2028)	• Convene sessions to scale the Agricultural Worker Registration System and unified database • Accelerate industrial transitions toward GI3 standards • Operationalize the Due Diligence Help Desk and SME One ID support.	Social welfare extends across the supply chain. SMEs possess verified business data to securely fulfill EU operator requests.
Long-Term (2028–2029)	• Execute community-based participatory mapping for land-use overlaps • Institutionalize Free, Prior, and Informed Consent (FPIC) for ethnic communities • Deliver conflict-sensitive operational guidelines to exporters.	Inclusive governance is established. Social risks and land conflicts within forestry and farming are minimized.

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Structural Note: Thailand's National EUDR Committee is in a formative stage, with ongoing efforts to actively strengthen inter-agency coordination, data integration pathways, and the full rollout of the National Single Window framework.



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