

Sustainable Agriculture for Forest Ecosystems

Recommendations on due diligence regarding the legality of coffee produced in Cameroon

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Sustainable Agriculture for Forest Ecosystems (SAFE)
Quartier Bastos, Rue Round-about Bastos-Dragage, near
Huawei Cameroun HQ
B.P 7814 Yaoundé, Cameroon
+237 683 023 607
E : cm-developpementrural@giz.de
I : www.giz.de/en

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Design
CREATIVE CAMEROUN SARL
Yaoundé - Tsinga

Text
TAMI INTERNATIONAL CONSULTING

Contributions
Myriam Tieumena Epse Guebiapsi,
Technical Advisor GIZ/SAFE.

GIZ is responsible for the content of this publication.

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I. Background

The "Sustainable Agriculture for Forest Ecosystems" (SAFE) project develops activities in ten countries: Brazil, Burundi, Cameroon, DRC, Ecuador, Indonesia, Peru, Uganda, Vietnam, Zambia.

The SAFE project aims at providing for a fair transition to "zero-deforestation" and legal value chains in order to lay the groundwork for the new European Union Deforestation Regulation (EUDR). The SAFE project provides technical assistance with a view to building capacities, scaling up traceability systems, and facilitating reliable and stable partnerships, including through exchanging and learning from a wide range of actors. This is why its activities target cocoa and coffee sectors with the intention to focus on integrating traceability, "zero-deforestation", and legality criteria.

Actually, as a major consumer of forest-risk commodities, EU adopted Regulation 2023/1115 on the placing on the EU market and export from the EU of certain commodities and products associated with deforestation and forest degradation. This regulation requires operators and traders importing forest-risk commodities into the EU to demonstrate that these products complied with legal requirements and are deforestation-free. It therefore prohibits the placing on the EU market and export from the EU market of products that have contributed to deforestation or forest degradation after 31 December 2020 or that do not comply with national laws in force in the country of production. Coffee features prominently among the seven products covered by this document.

In this way, companies affected by the regulation are now required to carry out due diligence prior to exporting or placing their products on the market, in order to provide sufficient information to ensure that the product carries no or a negligible risk of deforestation and of non-compliance. Traceability and transparency therefore stand out as essential prerequisites for the legality of coffee.

Despite the importance of coffee to the Cameroonian economy[1], there is no clear definition of a legal coffee. Thus, it becomes necessary to analyse existing practice and to develop a new consistent framework for ensuring the legality, sustainability, and transparency of the coffee sector in Cameroon. In fact, coffee, like cocoa, must be produced and marketed in accordance with the legal framework in force in Cameroon, while remaining aligned with the areas listed by the EUDR. These areas are: (i) land-use rights, (ii) environmental protection, (iii) third parties' rights, (iv) labour right, (v) human rights protected by international law, (vi) the principle of free, prior and informed consent, including as set out in the UN Declaration on the Rights of Indigenous Peoples, and (vii) taxation, anti-corruption, trade and customs regulations.

To ensure Cameroon's transition to compliance with the EUDR, it is necessary that actors involved in the coffee value chains, more specifically exporters/operators, can be equipped not only to identify existing and relevant legal provisions, but also to be

1 During the 2023/2024 coffee campaign, Cameroon was able to export 10,161 tons of Robusta coffee and 286,246 tons of Arabica coffee, despite the production declined by just over 25%, according to the latest data published by the National Cocoa and Coffee Board (NCCB).

able to make sure that the coffee they are placing on the European Union market is produced in compliance with the relevant legislation of Cameroon.

This work was carried out with the technical support of experts in law and due diligence from the firm TAMI international Consulting.

II. Objectives

This document aims at providing recommendations for risk management based on the identification of the main legal risks of non compliance (absence of land certificates, informal contracts, etc.) and the proposal of mitigation and support measures for operators in the sector (institution-building, guides, trainings, legal assistance).

III. Methodology of the study

III.1. Definition of due diligence

Due diligence is a continuous and dynamic process aimed at identifying, assessing, and mitigating the risks associated with sourcing activities (art. 8). It is not a fixed tool (checklist), but a dynamic mechanism that evolves according to new information or changes in risk, for example substantiated concerns (art. 10 of the EUDR) and changes in the supply chain. Furthermore, due diligence is not a simple compilation of documents. When the operator collects documents, s/he must ensure the authenticity of these documents as well as the reliability and veracity of their content.

Due diligence is also contextual, as it varies according to the specific characteristics of each operator, the nature of the product (beans, butter…), its suppliers, the number of intermediaries, the sourcing area, etc.

In addition, it must be carried out by the operator for each shipment within the framework of the EUDR.

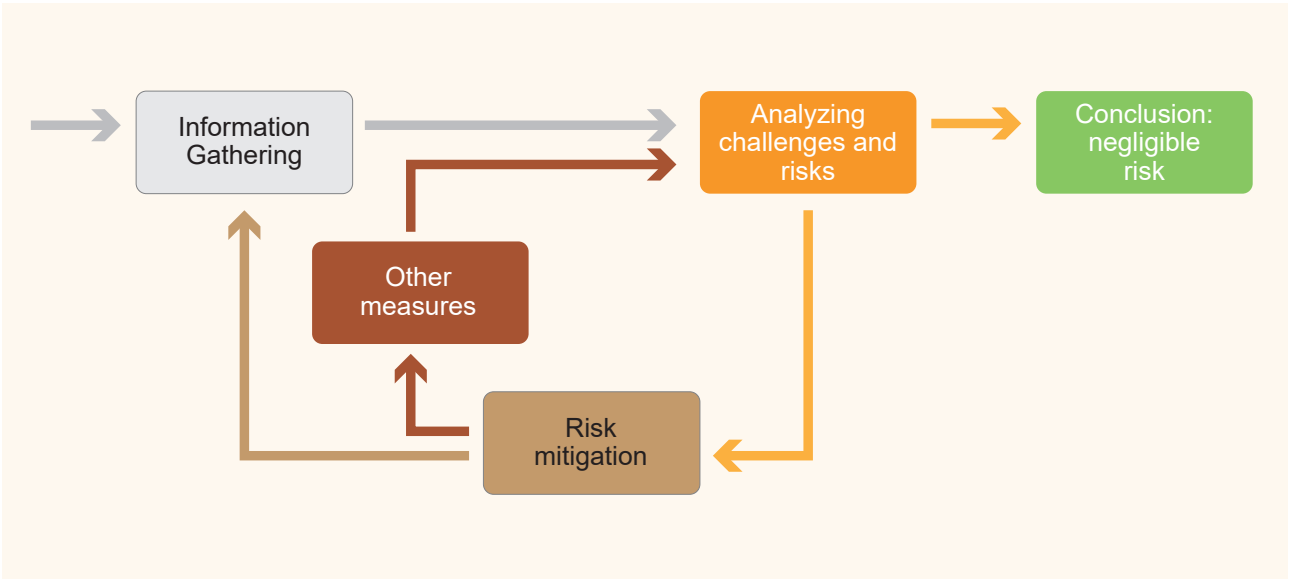


Figure 1: the steps of due diligence

Regarding the role **of the various actors in due diligence**, it should be remembered that the operator assumes all risks related to non-compliance with the EUDR of products imported into the EU. It is the operator who has the obligation to carry out due diligence (article 4.3.), who is liable, and who can be sanctioned in case of non-compliance (article 25).

Nevertheless, the European Union has recognised that producing countries can facilitate the work of operators and competent authorities, especially by providing information that allows for a better understanding of the applicable national laws (this is the purpose of step 1 of the study, which mapped the legal requirements relevant to coffee).

III.2. General approach

The development of due diligence recommendations for operators was based on the analysis of the level of implementation of the relevant legal requirements and existing means of verification, certification being in an embryonic stage in the coffee industry.

For the elaboration of these recommendations, due diligence models and repositories were used, such as those developed by Nepcon (Preferred by nature) with the support of the European Union's Life programme and the British Government, AMLA, and OECD State Aid, etc. The basis of reflection also built upon the Manuel d'appui à la diligence raisonnée sur la légalité dans le cadre du RDUE (Manual to support due diligence on the legality under the EUDR), in particular upon module 2, relating to the recommendations on due diligence regarding the legality of cocoa produced in Cameroon, developed in July 2025 by the European Forest Institute (EFI).

The preparation of the manual has been participatory, with the contribution of the main actor groups of the coffee production and marketing in Cameroon. This participatory process has made it possible to design a methodology that is tailored to Cameroon specificities.

The objective of this study is to promote a national, participatory, and consensual vision of the legal requirements that apply to Cameroonian coffee, in order to: (i) support the harmonisation of operators' due diligence approaches; (ii) encourage the simplification of procedures for upstream actors in the supply chain, by simplifying the process of collecting and transferring data required by their customers; and (iii) facilitate a better understanding of national contexts by the competent authorities in charge of controls. **It is important to note that the results provided are in no way legally binding, do not impose any obligation on the relevant actor, and do not constitute legal advice.** It is the responsibility of operators placing coffee or its derived products on the European market to identify the relevant legal requirements within the meaning of article 2(40) of the EUDR, and to adapt their due diligence to the risks identified. The results of this study, however, provide guidance that can support those operators and other industry actors in this direction.

In addition, the results of this study are likely to evolve over time and be updated due to several factors: potential legal reforms in the country, evolution of public or private certification standards, lessons learnt from the practical implementation of national

due diligence recommendations, additional guidance provided by the European Commission or competent authorities, integration of best practices and technological advances, etc.

The study is based on the work of national and international experts in law and due diligence, and on technical consultation with all the relevant national and international actors in the coffee industry: government departments and bodies, exporters, traders and chocolate makers, cooperatives and producer associations, certification bodies, civil society organisations and importing countries in the European Union.

III.3. Precautionary approach adopted for the study

In October 2024, the European Commission published a guidance document on the implementation of the Regulation. Concerning the legality criterion, the guidance proposes two criteria to define the relevance of legal requirements for the application of the EUDR. The requirements should firstly be strictly related to the legal status of the production area and should, secondly, be directly related to the objectives of the EUDR, that is, fight against deforestation, forest degradation, climate change, and biodiversity loss.

A strict interpretation of this guidance would lead to a potentially substantial reduction of national legal requirements, leaving out the labour law and certain human rights as well as third parties. At the same time, this guidance would extend the scope of the Regulation to the tax and anti-corruption requirements for the entire value chain, if this guidance is relevant to the EUDR objectives, and to the trade and customs requirements where they apply to the product in question.

However, the Commission guidance is not legally binding. It does not modify, add to or replace the provisions of the EUDR. Each EU Member State will adopt its own approach to control compliance with the EUDR. Moreover, only national judges have the power to interpret the EUDR in a binding manner and therefore determine its scope.

The study has accordingly adopted a precautionary approach, and covers all the areas of law listed in article 2.40 of the EUDR. It also includes the requirements relating to taxation, fight against corruption, trade and customs, including beyond the area of production. Nevertheless, there is a distinction between requirements which are directly related to the objectives of the EUDR and the others, the latter being marked with an asterisk. This flexible approach enables the user of the study results to choose the scope of the EUDR according to their reading of the EUDR scope.

III.4. How to use these due diligence recommendations?

For whom are these recommendations intended?

These recommendations are intended for various actors concerned with bringing coffee and its derived products into compliance with the EUDR. They may be useful to:

- **Operators within the meaning of the EUDR:** any natural or legal person who, in the course of a commercial activity, places coffee or derived products on the EU market or exports them.

- **Traders within the meaning of the EUDR:** any natural or legal person in the supply chain, other than the operator, who makes the products concerned available on the EU market.
- **Competent authorities of the EU:** authorities designated by the Member States to ensure compliance with the obligations of the EUDR.
- **Actors in the supply chain in Cameroon:** producers, cooperatives, dealers, exporters and other stakeholders involved in the production and marketing of coffee, who must provide operators with the information, data and documents necessary for the implementation of due diligence.
- **Cameroonian public entities:** government administrations and bodies responsible for: regulating the coffee sector (production and marketing); land; environment and sustainable development.
- **Civil society:** non-governmental organisations, associations and other actors playing a monitoring role, supporting producers and advocating to ensure the compliance of coffee and its derived products with Cameroonian legislation and international commitments.

What are these recommendations for?

These recommendations can be used in different ways and at different times depending on the actors involved.

Operators and traders can rely on these recommendations to set up and document their due diligence system, ensuring that the coffee they trade complies with the EUDR requirements on legality. They can use the recommendations to identify the documents and information to be collected or other actions to be carried out with their suppliers in Cameroon, and to assess the risks associated with their supply chain.

The competent authorities of the EU can use these recommendations as a standard for assessing the compliance of products placed on the EUDR's market. They can also rely on these recommendations to harmonise their controls and interpret documents from Cameroon.

Actors in the supply chain in Cameroon can use these recommendations to understand the implications of the EUDR requirements for Cameroonian coffee and the expectations of European operators and traders subject to those requirements. These recommendations may help them to structure and document the information to be provided. They can also help them anticipate the risks of non-compliance and adapt their agricultural and commercial practices.

Cameroonian public entities can use these recommendations to strengthen compliance checks of producers and exporters with national legislation, in order to guarantee that the coffee traded complies with the Cameroonian laws in force. They can also use them to support small producers in achieving compliance by providing them with better access to information on current regulations and buyer requirements. They can rely on these recommendations to make data more transparent and accessible, in particular by facilitating access to administrative documents, in order to help operators demonstrate the legality of coffee.

Civil society can use these recommendations to monitor the application of Cameroonian legal requirements by companies and the authorities. It can use them to conduct analyses and produce reports on the risks of non-compliance of Cameroonian coffee. It can also use them to raise awareness among producers, companies and consumers of the issues surrounding the legality of Cameroonian coffee.

III.5. Scope of the recommendations

Identification of the legal requirements relevant to the coffee industry in Cameroon

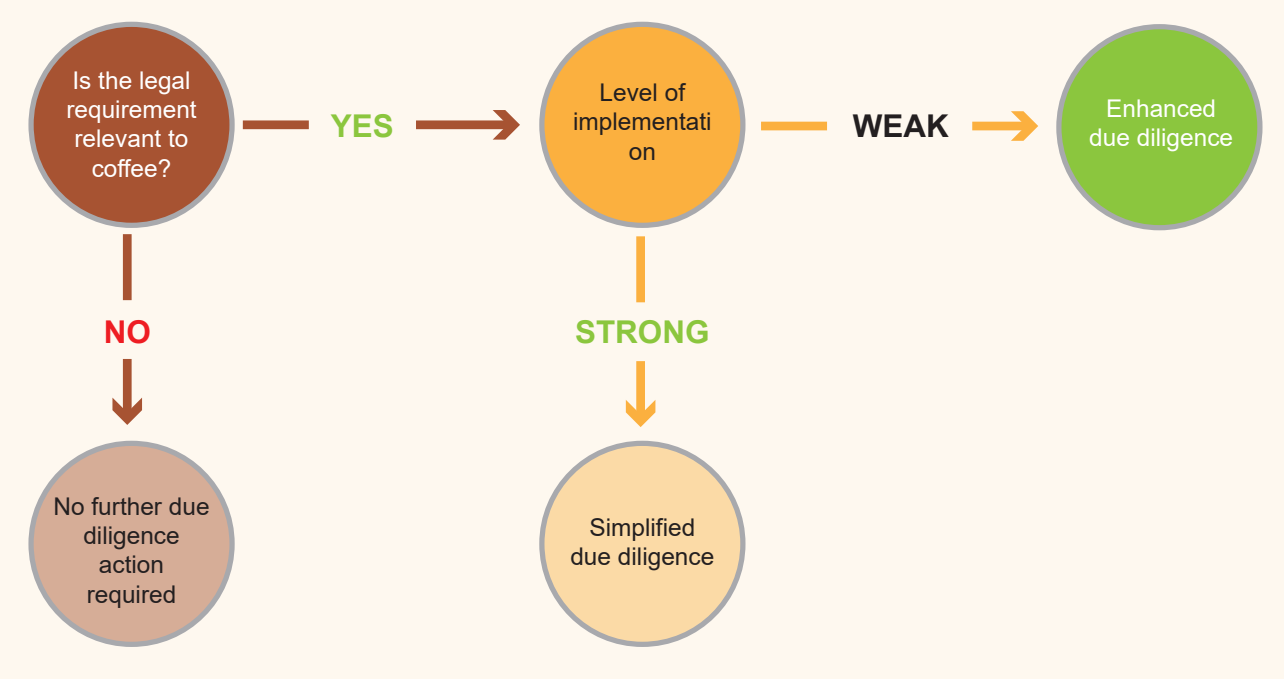
The recommendations presented in this document aim to address all the relevant legal requirements identified by the stakeholders in the first phase of this study (see the report Legal requirements relevant to coffee in Cameroon)[2]. These cover, in particular, all the legal areas listed by the EUDR (in article 2.40), in accordance with the precautionary approach adopted by the study (see appendix 1). Nevertheless, there is a distinction between requirements which are directly related to the objectives of the EUDR and the others, the latter being marked with an asterisk. This flexible approach enables the user of the recommendations to adapt their due diligence actions according to their reading of the EUDR scope.

Simplified or enhanced due diligence

This study adopts a pragmatic work approach, which aims to identify due diligence actions proportionate to the risks, in order to limit the burden on the industry actors. For each requirement deemed relevant to coffee production and trade in Cameroon, a level of implementation has been assessed. The level of implementation adopted by the study is based on: relevant literature, experts' knowledge of the sector, field surveys carried out as part of the study, and bilateral and multi-actor consultations organised throughout the study. Where the level of implementation assessed for a requirement is strong, the risk of non-compliance is considered negligible. Consequently, simplified due diligence actions are recommended.

In contrast, when the level of implementation adopted for a requirement is low, the risk of non-compliance is considered non-negligible. Consequently, enhanced due diligence is recommended.

2 Deliverable 2 of this mission



* For the legality criterion

Figure 1: Decision step for the development of due diligence recommendations

However, this analysis is only indicative and has only been carried out at the country level. It is the responsibility of the operators to carry out a risk analysis of non-compliance of their products for each coffee and its derived products shipment from Cameroon. It is within this framework that the present recommendations provide a range of due diligence options to facilitate such analyses of non-compliance. These actions are neither prescriptive nor presented in a hierarchical order. It is up to the operators to choose from these options according to the context, their knowledge of their supply chain and the identified risks for coffee and its derived products.

The tables are preceded by a paragraph which provides a general overview of the current context of the relevant area of law, sometimes relying on the legislative and regulatory framework or on other factual elements, allowing users to understand the policy directions of the area.

IV. Recommendations on due diligence regarding the legal requirements relevant to coffee production in Cameroon

IV.1. Category 1: Land-use rights

The Cameroonian land tenure system is based on the coexistence of customary law and civil law. The 1974 Ordinance on land establishes the land certificate as the sole proof of land ownership, but recognises peaceful customary land use by communities, including indigenous populations. In the coffee sector, this duality is reflected in a mainly informal land use: the vast majority of Arabica and Robusta coffee farms are established on untitled lands owned on the basis of customary land rights, historically recognised by village communities. To date, the Cameroonian government's efforts to simplify the proof of rights to land have not resulted in the creation of another document with the same weight as the land certificate. Only interim documents that can be issued in the course of the procedure for obtaining land certificate have been so far created, such as the certificate of customary land rights recognised administratively.

Therefore, small producers, which represent the core of coffee industry in Cameroon, do not have a legal obligation to hold a land certificate to exercise their land-use rights. Those rights, well rooted in the customary systems, ensure a relative land security, especially in traditional coffee areas like the West, North-West, Littoral, Adamawa regions and some areas of the Centre region. Besides, Cameroonian legislation prohibits agriculture in the permanent forest estate unless it is permitted in the management plans.

It should also be noted that a land law reform is under way in Cameroon, but its contours remain largely unknown. In the meantime, the minister of State Property, Surveys and Land Tenure is trying to reinforce the land management framework through specific legal texts, pending the completion of the reform initiated.

IV.1.1. Requirements calling for simplified due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Land ownership and use rights	Land ownership is demonstrated by a land certificate established in accordance with the laws and regulations in force.	Field surveys have shown that around 97,2% of producers are small producers whose farms are less than 5 hectares, and that 82,62% of those farms are family-owned (TAMI-2025). According to the International Coffee Organisation (ICO), coffee farms in Cameroon are generally of very small size, that is approximately 0.5 ha for Robusta coffee against 1.9 ha for Arabica (ICO). Access to land for coffee farming in Cameroon is governed by a legal framework that combines aspects of formal land law and customary practices. The coexistence of customary law and modern law is recognised in the texts in Cameroon. It is not strictly mandatory for small-scale coffee producers to have a land certificate in order to hold land rights and cultivate their land. Moreover, land registration is not widespread in rural areas and particularly in areas of coffee production in Cameroon. According to field surveys conducted in relation to this study, only 1% of the informants claims to have a land certificate on their production plots (TAMI, 2025).	**1. Stakeholder consultations** Confirm that there is no significant land dispute in the sourcing area by conducting interviews with key local actors: Chiefs and traditional authorities, family members, local residents, NGOs and other local actors. **2. Implementation of procedures/processes** Supporting producers in obtaining land certificates or other documents securing land (letter of no objection, grants, various contracts, Attestation of recognition of customary land rights (ARDFC), and Attestation of peaceful enjoyment of land [AJPTER], etc.). **3. Collection and verification of documents** If adequate documentary collection systems exist within the operator's company or producer organisations: collect and record available documents attesting to land ownership or to peaceful occupation rights of producers, including indigenous populations (land certificate, certificate of ownership, notarised deed of sale, deed of donation or inheritance, certification of customary ownership, deed of sale or traditional exchange, proof of residence or occupation, cadastral plan, rental contracts, grant, lease, certificate of customary rights ownership recognised administratively, letter of no objection, Attestation of recognition of customary land rights (ARDFC), and Attestation of peaceful enjoyment of land [AJPTER], etc.).

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
	Farmers must have either formal property rights sanctioned by a land certificate, or rights of occupation or peaceful use of the plot.	The vast majority of land in Cameroon, and particularly the plots used for coffee production, are occupied and farmed without title deeds. According to civil society, indigenous peoples or local family-oriented communities always have a land-use right, even without land certificates. Field surveys in production areas have also shown that coffee farms are often managed based on a contract between individuals. In any case, land rights and land-use or occupation rights are generally clearly determined at the local level by customary law. Disputes are very rare and are dealt with effectively through local processes. Eventually, it is worth mentioning the important place of Circular letter No. 0001/MINCAF/CAB/LC of 20 February 2026, which states that in case farms are larger than 10 hectares, producers can apply for an Attestation of recognition of customary land rights (ARDFC) and an Attestation of peaceful enjoyment of land (AJPTER) issued by third-class chiefs of the location where the relevant field is found, duly recognised by administrative authorities that have jurisdiction and co-signed by way of exception by first- or second-class traditional rulers of the location where the field is found when it is mandatory to conform to local customs and traditions. This circular letter marks an important milestone with regard to peaceful occupation and use rights of the plot. The text being still recent, there are no cases of documents to be collected yet.	**4. Collection of other relevant data** Identify which plots are occupied and developed by someone other than the holder of the land rights.

IV.1.2. Requirements calling for enhanced due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Protected areas	Any activity in a permanent forest estate must comply, as appropriate, to its development plan or to its simple management plan	Coffee farms located in permanent estate forests should be taken into account in development plans. Field surveys indicate that few coffee production activities are carried out in communal forests, protected areas, and FDUs (Forest Development Units, a type of forests within the permanent forest estate) (TAMI-2025). However, when agricultural production activities are provided for in the development plan or simple management plan, it is common for farms to extend beyond the areas permitted according to the forest management documents. Protected areas, including parks, form part of the permanent forest estate and are covered by this requirement. The Santchou wildlife reserve is particularly affected by coffee cultivation, though this remains on a very small scale.	**1. Determine whether the coffee comes from a forest in the permanent forest estate, and the type of forest if applicable:** **Map analyses** Overlay the geolocation data of the plots (data collected for the EUDR traceability requirement) with the boundaries of the Cameroon forest atlas. **2. Where applicable, if the production area is in the permanent forest estate** **Collection and verification of documents** Collect the classification document and the development plan or simple management plan, as appropriate. Check that these documents authorise the agricultural activity, and the associated constraints (location of the area, surface area). If applicable, check whether the area in question has been declassified (declassification decree). **Stakeholder consultations** Confirm the proper implementation of the provisions of the Development plan or Simple management plan relating to the area of production of coffee in the forest through interviews with community representatives, local NGOs, local authorities (notably in charge of forests and wildlife), and other local stakeholders.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
			Field verifications Conduct field visits to confirm the proper implementation of the provisions of the Development plan or Simple management plan relating to the area of production of coffee in the forest, especially by: (1) interviewing forest managers and producers of coffee in the forest; and (2) making direct observations in the forest and on the coffee plots.
	Land-use rights are maintained in forests of the national estate, except in areas closed off and those for which regulations are made by the minister in charge of forests or the minister in charge of mines, and in accordance with the regulation on pits.	It is common that areas are closed off, particularly for ecological reasons (fragile ecological systems, riparian zones, etc.). Studies show that production sectors entailing the extension of cultivation spaces drive deforestation[3] through the extension of existing farms or the creation of new farms in new areas of production, including to the detriment of forest areas where there are prohibitions. This is the case in Santchou where coffee farms extend to the wildlife reserve.	**1. Stakeholder consultations** Ask the local authorities, particularly the forestry authorities (central administration or forestry station managers) and other actors such as researchers and NGOs, if there are any closed off areas in the sourcing area. **2. Map analyses** Overlay the geolocation data of the plots (data collected for the EUDR traceability requirement) with the map of closed-off areas. **3. Field verifications** Conduct field visits to confirm the proper implementation of the provisions of the Development plan or Simple management plan relating to the area of production of coffee in the forest, through: (1) interviews with community forest managers and coffee producers in the forest; and (2) direct observations in the forest and on the coffee plots.

3 https://www.cifor-icraf.org/publications/pdf_files/OccPapers/OP-57f.pdf

IV.2.Category 2: Environmental protection

In terms of legal requirements relating to environmental protection for coffee cultivation, the main elements to note are as follows:

- Coffee cultivation requires the use of chemicals, although the phytosanitary protection involving the use of pesticides has always been low in coffee cultivation in Cameroon (2.54%)[4]. In the last few years, producers have actually been using fewer and fewer pesticides due to their high cost and the volatility of prices on the market. That being said, the use of prohibited products is reported in coffee farming. Several factors make it difficult to fight against prohibited products in coffee farming: 1) prohibited products are very popular in other crops, especially in food crops[5], hence their regular presence in supply chains. 2) due to the decline of the sector, there is much less control, in particular as far as the quality of agrochemical products used is concerned. The threat this situation poses to the quality of the environment and life is exacerbated by the timing of application of some products. Some products are actually intended to be applied at the time of coffee harvest. Admittedly, the main effects are found in the fruits not the seeds, but the harmful effects of those products are not annihilated so far. 3) the list of products approved for use is quite often effective for several years without being updated (the one currently in effect is from 2023).
- Both varieties of coffee found in Cameroon are grown under shade or without shade and require, depending on the inter-branch organisation, that more trees are cut down than for crops like cocoa. Production increase, however, takes place mostly through the regeneration of old plantations (ICO) with some cases of establishment of new plantations in the East region. These are generally of very small size, that is approximately 0.5 ha for Robusta coffee against 1.9 ha for Arabica (ICO). Formerly large size plantations are being converted to other uses. The small size of plantations is an obstacle to carrying out environmental and social impact assessments. No plantation of 100 ha or more has been reported.

https://www.ico.org/documents/cy2016-17/icc-120-5f-profile-cameroon.pdf 4

5 Tchekote (H), Nguiffeu Tajouo (E.-L.), Nguedia Melachio (M.), Siyapdje (E. C.), and Mbeng (E.), 2019. Farmers' Accessibility to Pesticides and Generalization of Farming Practices besides the Legal Framework in Northern Bafou, in the Bamboutos Mountains (West Cameroon). In: Sustainability in Environment, ISSN 2470-637X (Print) ISSN 2470-6388 (Online), Vol. 4, No. 1, 2019, www.scholink.org/ojs/index.php/se, pp. 41-56.

IV.2.1. Requirements calling for simplified due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Use of pesticides/ fertilisers and waste management	Pesticide applicators are authorised.	Field surveys conducted in this study reveal that up to 61.4% of the producers interviewed use pesticides in their plantations (TAMI-2025). Those producers do not consult professional applicators. According to MINADER, professional applicators rarely operate in rural areas (comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025). However, PARF-CAFÉ, which aims to increase yields per hectare from 385 kg to 700 kg, organises farm field schools in coffee production basins and trains producers on agricultural best practices, including on pesticide application. Also, on 4 June 2025 at the Hotel Mont Fébé in Yaoundé, cocoa and coffee industry actors launched the platform for regulatory watch, alerting, and sanitary and phytosanitary surveillance of cocoa and coffee quality. At last, thanks to the support from the CCIC, the Baditoum village now has an ultramodern centre of excellence comprising a fermentation room and a drying area meeting the optimal conditions not only for a better coffee quality but also for a better consideration of postharvest waste.	**Collection and verification of documents** Collect on the basis of a sample: 1. The authorisations of applicators used by producers (from applicators of MINADER) 2. The training certificates for producers on best practices 3. The producers benefiting from centres of excellence

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Soil use	Any activity related to soil use is carried out in such a way as to avoid or reduce soil erosion and desertification.	In general, coffee farming does not contribute to desertification or erosion. The potential erosion, particularly of sloping ground, is limited by the fact that the coffee plantations are perennial (the plants fix the soil) and by the way the coffee plantations are created (by digging holes, in an agroforestry system in forest areas [Centre and East regions in particular] and in some locations such as Kouoptamo or Magba in the Noun). One can also note the role of producer trainings on agricultural best practices (BPA) and the phenology of the cocoa and coffee trees. Those training, however, do not involve all coffee producers for now.	**At the level of the sourcing area:** **1. Collection and verification of documents** Consult the potential reports from NGOs, cooperatives, and the administration relating to potential cases of soil degradation in the sourcing area. **2. Stakeholder consultations** Confirm the absence of cases of soil degradation in the sourcing area through interviews with cooperatives, NGOs, authorities, and other local actors. **With producers and intermediaries in the supply chain, including:** **1. Implementation of procedures/processes** Support producers in the best practices for the use of soil at risk of erosion, for example through training, communication campaigns, etc. **2. Collection of relevant data** Possibly obtain details on potential training for producers (training organisations, date, participants, content, etc.) in best agricultural practices.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Environmental and social impact assessments	Any project likely to have an impact on the environment must undergo a social and environmental impact assessment, a strategic environmental evaluation, or an environmental impact notice, when the size of the proposed area is equal to or greater than 100 ha.	Due to the small size of coffee farms, they are not subject to the obligation to carry out an environmental impact assessment or the resulting consultations with local populations. It should indeed be noted that large colonial coffee plantations have been gradually replaced by market gardening. For example, in 1999, coffee cultivation was no longer present in most large plantations: COOPAGRO was exporting only 70 tons of coffee produced on 250 ha. Before 1980, it used to export 1,000 tons each year, with around 3,000 ha in production.[6] Since then, cultivated areas have continued to decrease to such an extent that field surveys show that nowadays, coffee farms are mainly small structures presented as follows: (i) micro-farms (14.1%), with areas less than 1 hectare; (ii) dominant small farms (63.4%), with areas ranging from 1 to 3 hectares; (iii) middle-size farms (19.7%), with areas ranging from 3 to 5 hectares, and lastly, large farms (2.8%), above 5 hectares or more (TAMI, 2025).	**Determine whether the plot is larger than 100 ha:** **Map analysis** Analyse the geolocation data of the plots to determine their surface area. **If applicable (plot <100 ha):** **Collection and verification of documents** Collect the study report, evaluation report, or environmental impact notice.

6 Laurien Uwizeyimana, "Après le café, le maraîchage ? Mutations des pratiques agricoles dans les Hautes Terres de l'Ouest Cameroun", Les Cahiers d'Outre-Mer [Online], 247 | July-September 2009, put online on 1st January 2012, accessed on 17 January 2026. URL: http://journals.openedition.org/com/5675; DOI: https://doi.org/10.4000/com.5675

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Conversion of forests	In community forests, any land clearing must be carried out in accordance with the Simple management plan.	This requirement only applies to coffee produced in community forests, which is not a major source of production for Cameroon. However, in the Centre, South, and East regions where large community forests are found, these being areas of coffee production, it is possible to establish coffee farms in community forests in contradiction with the Simple management plan. In the East region of Cameroon for example, coffee production, especially Robusta coffee, is being revived thanks to support programmes for young farmers and traditional practices. Simple community forest management plans (SMP) generally exist and do provide for authorised activities within the community forest. However, they are not always up to date. They must be revised every five years and the costs of this revision are not always affordable for the communities concerned (Circular letter from MINFOF to forestry station managers, 2023)[7]. Meanwhile, in the East region of Cameroon, coffee production, especially Robusta coffee, is being revived thanks to support programmes for young farmers and traditional practices.	**1. Determine whether the coffee comes from community forests:** **Map analysis** Overlay the geolocation data of the plots with the data of the Cameroon forest atlas to determine the cases where coffee is produced in community forests. **2. If applicable (coffee comes from a community forest):** **Collection and verification of documents** Collect the current simple management plan for the community forest in question. Confirm that the management plan authorises land clearing for agricultural activity, and the associated constraints (area, surface area, other conditions for land clearing). **Stakeholder consultations** Confirm the proper application of the provisions of the Simple management plan relating to land clearing for agricultural activity through interviews with community representatives, local NGOs, local authorities and other local stakeholders.

7 Circular letter No. 3398/L/MINFOF/SETAT/SG/DF/SDAFF/SDAF/SDFC, of 14 June 2023

IV.2.2. Requirements calling for enhanced due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Fertilisers **Phytosanitary products** **Water** **Soils**	Only approved phytosanitary products are used by farmers following the planned technical itinerary. Only approved fertilisers products are used in farms following the planned technical itinerary.	Coffee farming requires the use of pesticides to control pests and diseases. Excessive or inappropriate use of pesticides can result in soil and water pollution, as well as biodiversity loss. Nevertheless, some sustainable coffee cultivation methods such as sustainable agriculture or agroforestry help minimise the use of chemical pesticides and promote biodiversity. However, coffee cultivation – which was traditionally intensive in some production basins such as Moungo and West Cameroon – has become more extensive with the use of very few pesticides and fertilisers. The use of those pesticides and fertilisers is often low or non-existent among small producers, who rely more on hand weedings. Field surveys indicate that up to 38.6% of them do not use any chemicals (TAMI, 2025). Those who use those products do it in a consistent manner for coffee production. The obligation applies in particular to those who use pesticides: the producer and their applicators. It should also be noted that some producers use unapproved products on the pretext that these are more effective (comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025).	**Implementation of procedures/processes** **1. Systematic collection of information from producers,** if available, on: (i) the method of application of fertilisers and phytosanitary products (direct or by subcontracting); (ii) the type of fertilisers and phytosanitary products used (confirm that they are on the updated list of approved products); and (iii) the method of packaging treatment. This collection can be done, for example, by regularly filling in a fertiliser and phytosanitary product application monitoring sheet and a packaging monitoring sheet, or by regularly filling in a questionnaire. **2. Provision to producers of the up-to-date list of authorised/unauthorised fertilisers and phytosanitary products** at the cooperative level as well as the list of approved applicators

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
		It is worth noting that the majority of producers or applicators obtain pesticides either from cooperatives or on local markets. Producers covered by a sustainability certificate or members of a cooperative, as well as professional applicators, generally use authorised/approved pesticides. Several projects and initiatives to support producers do exist, such as the Project for the Relaunch of the Coffee Industry). This is a strategic programme of the Government of Cameroon, led by the Ministry of Agriculture and Rural Development (MINADER). Such projects aim at relaunching coffee cultivation by making it possible for producers to access inputs as well as training them in best practices. Furthermore, input supply to coffee producers in Cameroon is mainly supported by the Cocoa and Coffee Sector Development Fund (CCODEF) through its Producer's Desk, which subsidises inputs (fertilisers, seedlings, etc.) and equipment, requiring producers to make a financial contribution (60%) to receive vouchers[8]. However, producers not affiliated with a cooperative or with farm field schools have difficulty implementing this requirement. They are not always informed of the regulatory framework and the list of authorised pesticides and fertilisers. They purchase the products in very informal contexts.	**3. Provision to producers of tools for monitoring** the application of fertilisers and phytosanitary products and the treatment of packaging, for example monitoring sheets for collecting information. **4. Support for producers** on authorised/unauthorised phytosanitary products and fertilisers and on the treatment of packaging, for example through training, communication campaigns, etc.

8 https://www.fodecc.cm/?p=6271#:~:text=Pour%20s'assurer%20de%20l,Etat%2C%20Son%20Excellence%20Paul%20BIYA.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
		Pesticide use is generally low among small producers, but it is still significant among some producers who are more professional or targeted by mentoring projects. Small producers actually use very little or no pesticides, preferring hand weeding. Only 38.6% of producers interviewed as part of this study use no chemical (TAMI, 2025). Those who use pesticides do it in a consistent manner for coffee production. There is also a mixed use of authorised and unauthorised pesticides, but unauthorised products remain especially present among producers with little mentoring. Eventually, because of difficulties experienced in the sector for quite some time, checks are almost non-existent and are rarely designed for small or unaffiliated producers.	
	The spillage, burial or dumping of agricultural waste likely to compromise water quality is prohibited	Coffee production requires a lot of water, especially for grain processing. Coffee washing waters are often discharged into waterways without being treated. They can cause eutrophication and bacterial contamination, thus compromising water quality. However, surveys show that washing mainly concerns Arabica coffee, which is produced in the West, North-West, and Adamawa regions, although in this last region, production is marginal on the edge of the Adamawa plateau. Given the landform, most of the producers do not take their depulped coffee to waterways; they wash it in their homes, which minimises the risk of contamination of waterways.	

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
		Moreover, in some localities like Kouoptamo in the Noun, cherry coffee is sold to certain cooperatives that have the treatment equipment and techniques to minimise the contamination of waterways.	
	Waste should be treated in an environmentally sound way in order to eliminate or reduce their harmful impact on human health, natural resources, fauna and flora, and on the quality of the environment in general.	Treating coffee beans can generate wastewater containing caffeine residues and other potentially harmful substances. Such waste should be properly treated to avoid waterway pollution.[9] Meanwhile, the comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025, indicate that there is no specific waste treatment as long as waste is reusable for growing crops and when it is used as biochar. They are also used as wood chips. Coffee farming, furthermore, generates a lot of waste, including the packaging of products applied in plantations.	**Collection and verification of documents** **Collection and documentary verification of the following:** • Certificate of training for producers in the proper use of fertilisers and pesticides and in good practices in the treatment of packaging, by institutions like PARF-Café • Partnership contract with an organisation authorised to collect hazardous waste • Waste return slip to the central office of the cooperative or intermediary **Collection of relevant data** • Details of producer trainings (training organisations, date, participants, content, etc.) • Aggregate data on fertiliser and pesticide application methods and the type of fertiliser/ pesticide, as well as on empty packaging treatment methods

9 https://www.chacunsoncafe.fr/blog/impact-environnemental-du-cafe-faut-il-arreter-den-boire/

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
			Field verifications • Verification at the producer level, on a regular and sample basis, to assess the potential use of unauthorised fertilisers and pesticides and the treatment of empty packaging: (1) interviews with producers; and (2) direct observations, particularly in the storage and empty packaging disposal areas. Record these checks in the register of due diligence actions. • Verifications at the level of intermediaries, if they monitor producers at their level.
Biodiversity and endangered species	Activities in forest areas must take account of nature conservation, the preservation of animal and plant species and their habitats, the maintenance of biological balances and ecosystems, and the conservation of biological and genetic diversity against all causes of degradation.	The Cameroon forest area belongs to coffee farming areas, mainly Robusta coffee, which is typically grown in an agroforestry system where coffee trees and food crops or coffee cultivation and other cash crops, like cocoa or oil palm trees, are combined. Research has actually shown the contribution of agroforestry systems combining cocoa, coffee, and oil palm trees to biodiversity conservation around forest concessions[10]. However, some coffee farms are found in swampy areas and the edges of waterways. Such areas are ecosystems in which coffee production is quite good, and are therefore very popular with coffee farmers. The risk of degradation of these ecosystems is high.	**1. At the level of the sourcing area:** **Collection and verification of documents** • Collect and analyse the MINFOF offences register (search online on the ministry's website or request by post) to check whether the producer has been involved in offences relating to the preservation of ecosystems, fauna and flora.

10 https://www.cifor-icraf.org/ressac/analyse-du-fonctionnement-et-de-la-contribution-des-systemes-agro-forestiers-a-base-de-cacao-cafe-et-palmiers-a-huile-a-la-conservation-de-la-biodiversite-autour-des-concessions-forestieres/

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
		Also, some protected species of fauna can be found on farms, especially in agroforestry systems where forest trees are integrated (cases of human-wildlife conflicts recorded). Farms close to natural forests may see mammals and birds passing through, especially during migration periods. Producers whose plantations are located near protected areas and classified forests of the permanent forest estate are likely to engage in or facilitate illegal hunting activities. In recent years in Cameroon, there have been initiatives to relaunch coffee cultivation in Cameroon. These were supported by the Government of Cameroon. Programmes like New Generation from the CCIC support young farmers by providing training and inputs, while the search for improved crops and the improvement of local prices (reaching record highs) seek to revitalise the sector.	**Stakeholder consultations** • Confirm the proper application of biodiversity protection standards through interviews with community representatives, local NGOs, local authorities (forestry station, gendarmerie) and other local stakeholders (are there alternatives to bushmeat, are there frequent cases of arrest for poaching, etc.). **2. At the level of the production plot:** **Field verifications** • Conduct field visits to confirm the proper application of biodiversity protection standards, through (1) interviews with producers (level of knowledge of regulations, illegal hunting activities, protected species of fauna and flora, etc.); (2) direct observations on the coffee plots (presence or absence of sensitive ecosystems such as waterways and swampy areas, as well as protected flora and fauna).

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
		As part of this relaunch, coffee seedlings are provided to producers[11] for the renewal of orchards. However, in some production basins like in the East region, new plantations are created. These are often integrated into agroforestry systems with food crops, with strong positive impacts like local economic structuring, land development, and improvement of family incomes thanks to increased yields. These dynamics, however, do not always take into account the environmental challenges, including deforestation and biodiversity conservation.	

11 Donfack Olivier (2018), Programme de relance de la caféiculture au Cameroun : jeux d'acteurs et perspectives dans les départements de la Menoua et des Bamboutos (Hautes Terres de l'Ouest). Doctoral thesis. Department of Geography, University of Dschang. 294 pages

IV.3. Category 3: Third parties' rights

Due to the small size of coffee farms, they are generally not likely to infringe the rights of third parties. The obligations relating to environmental impact assessments, in particular consultation procedures, are only relevant above a threshold of 100 hectares. In practice today, not a lot of coffee plantations in Cameroon reach such proportions, which makes these requirements relevant only in a very limited number of cases. Concerning other requirements that protect third parties' rights, other sections (categories) can be consulted.

IV.3.1. Requirements calling for simplified due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Information of local communities	The environmental and social impact assessment or the strategic environmental evaluation or environmental impact notice must be conducted with the participation of the people concerned through public consultations and hearings, to gather their views on the project.	The size of coffee plantations in Cameroon today has decreased so much that it is no longer possible to find production plots reaching 100 ha. For this reason, smaller and smaller plots are not legally subject to the obligation to carry out an environmental impact assessment or to consult with local populations. Field surveys show that nowadays, coffee farms are mainly small structures presented as follows: (i) micro-farms (14.1%), with areas less than 1 hectare; (ii) dominant small farms (63.4%), with areas ranging from 1 to 3 hectares; (iii) middle-size farms (19.7%), with areas ranging from 3 to 5 hectares, and lastly, large farms (2.8%), above 5 hectares or more.	**Determine whether the plot is larger than 100 ha** **Map analysis** • Analyse the geolocation data of the plots to determine their surface area. **If applicable (plot <100 ha)** **Collection and verification of documents** • Collect the study report, evaluation report, or environmental impact notice.

IV.3.2. Requirements calling for enhanced due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Community rights	Everyone has the right to a healthy environment	Refer to all requirements relating to environmental protection.	Refer to all requirements relating to environmental protection.

IV.4. Category 4: Free, Prior and Informed Consent (FPIC)

Cameroon does not have a binding legal framework regarding free, prior and informed consent (FPIC). A few initiatives do exist, including within the framework of REDD+, but they are only non-binding guidelines. Nevertheless, in the context of the implementation of development projects and in accordance with the legal framework regarding the conduct of impact assessments, consulting with the populations is a legal requirement. This requirement simply does not seem to reflect the current situation of coffee in Cameroon..

IV.4.1. Requirements calling for simplified due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
FPIC	Concerning projects that affect local and indigenous communities, the participation of these through public consultations and hearings is required.	The size of coffee plantations is generally unlikely to pose a threat to the lives of local communities or indigenous populations. Moreover, the size of plantations is unlikely to inspire the implementation of procedures requiring the participation and consultation of these people.	**Determine whether the plot is larger than 100 ha** **Map analysis** • Analyse the geolocation data of the plots to determine their surface area. **If applicable (plot <100 ha)** **Collection and verification of documents** • Collect the study report, evaluation report, or environmental impact notice, the minutes of the consultation meeting.

IV.5.Category 5: Taxation, fight against corruption, trade and customs

The decline of the sector since the late 1990s, marked by a profound breakdown of producer organisations, has led to a weakening of administrative controls, including at the level of production. Only the marketing segment (marketing and export formalities and taxes paid by the exporters) remains well controlled. Thus, it has been the subject of extensive codification in recent years, as reflected by the decree No. 0096/ MINCOMMERCE/CAB of 15 April 2024, specifying the marketing, transport, and storage arrangements of green coffees.

Lastly, this EUDR category may concern the entities in the entire supply chain of the producing country, namely producers, factory owners, tradesmen, and coffee exporters, and not only at the level of the coffee production plot.

IV.5.1. Requirements calling for simplified due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Taxes and duties	The coffee marketing activity is subject to the payment of either the synthetic general tax or licensing rights and the corporate tax, depending on the type of business.	Field surveys indicate that the collection of taxes and duties in the context of coffee marketing is relatively easy and facilitated by the existence of a one-stop shop linking all producer mentoring organisations and aiming at digitise, streamline, and secure foreign trade transactions (TAMI, 2025). Documents certifying the payment of the different taxes and duties, such as receipts and certificates of tax compliance, are available, dematerialised, and regularly issued by the tax administration. The issuance of the certificate (ACF), which is the end point document, is easy.	**Collection and verification of documents** **Collect by sampling:** • Receipts/ certificates of tax compliance (ACF) of actors in the value chain involved in coffee marketing activities • Certificate of exemption, as necessary.
Trade	The coffee exporter must have a certificate of tax compliance	Certificates of tax compliance are easily issued from the digital platform of the Directorate General of Taxation at the end of the telereporting and payment process. They prove that taxpayers have paid all their taxes and duties.	**Collection and verification of documents** • Systematically collect the certificates of tax compliance and sales slip of the actors involved in the chain.
	All coffee exports must be recorded in terms of volumes, quality, type, and price for statistical purposes	Procedures are generally properly observed at the time of the export, be it for cocoa or coffee. Recording information relating to volume, quality, types, and prices facilitates the development of a national database on the Cameroonian coffee exported.	

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
	Batches of coffee intended for export are accompanied by an inspection note certified by the National Cocoa and Coffee Board, and a valid phytosanitary certificate.	This requirement aims to guarantee the quality of coffee for export through authentication issued by the NCCB and a phytosanitary certificate. The interviews conducted, especially with the Directorate General of Customs, show that this obligation is respected and is a mandatory prerequisite for the export procedure.	**Collection and verification of documents** **Systematically collect for actors involved in the supply chain:** • Inspection notes certified by the National Cocoa and Coffee Board, and • Valid phytosanitary certificates
	The export of dark beans, coffee chips, unprocessed residues, and samples of green coffees can take place with the authorisation of MINCOMMERCE.	This requirement aims at ensuring the quality of the coffee meant for export and at controlling the export of dark beans, coffee chips, unprocessed residues, and sample of green coffees, which can only be exported with an authorisation. The interviews conducted, especially with the Directorate General of Customs, indicated no evidence of risk of non-compliance with this requirement.	**Collection and verification of documents** **Systematically collect for actors involved in the supply chain:** • Inspection notes • Export authorisations
	All coffee exports must be the subject of a bank domiciliation and the repatriation of foreign currency in accordance with the conditions and time limits stated by the regulation in force.	This requirement aims to ensure the repatriation of foreign currency at the end of the coffee export cycle. The interviews conducted, especially with the Directorate General of Customs, indicated no evidence of risk of non-compliance with this requirement.	**Collection and verification of documents** **Systematically collect for actors involved in the supply chain:** • Certificates of bank domiciliation, and • Bank statements showing previous transactions.
Product quality and packaging	Coffee can only be marketed having been shelled or hulled. It must be properly dried and free of all foreign matter. The moisture content should in no case exceed 12%.	This requirement aims at ensuring a certain quality of the coffee exported. The results of consultations carried out suggest that producers have an advanced knowledge of the physical and technical quality requirements for preparing the beans for marketing.	**Collection and verification of documents** **Systematically collect the following documents for the intermediaries in the supply chain:** • Inspection note • Phytosanitary certificate

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
	Coffee must be bagged in bags complying with packaging standards.	This requirement aims to ensure that coffee packaging standards are met. No clear infringements of the coffee packaging standards on export were reported during surveys or stakeholder consultations.	**Collection and verification of documents** **Systematically collect the following documents for the intermediaries in the supply chain:** • Inspection note (before export, batch checks by licensed private companies like ACE Cameroun, SGS, Bureau Veritas) • Packing certificates
Customs	The export of green coffees is subject to the exit note after the operator has completed all administrative formalities, technical controls, and payment of exit duties and royalties required on the e-GUCE platform	This requirement aims to ensure that all customs obligations are met at the time of coffee export. The interviews conducted, especially with the Directorate General of Customs, show that this obligation is respected and is a mandatory prerequisite for the export procedure.	**Collection and verification of documents** **Systematically collect certificates of exit note (end point document) for actors in the supply chain.**
	The shipment of green coffees intended for export must be accompanied by some documents	This requirement aims to ensure the compliance with all administrative procedures related to coffee export. The interviews conducted, especially with the Directorate General of Customs, show that this obligation is respected and is a mandatory prerequisite for the export procedure.	**Collection and verification of documents** **Systematically collect for actors involved in the supply chain:** • Pre-liquidation sheets • Inspection notes • Phytosanitary certificates • Receipts of payment of taxes and royalties • Packing or loading certificates • Consignment notes

IV.5.2. Requirements calling for enhanced due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Trade	The milling and sales of green coffees are limited to producers, producer organisations, economic operators who have signed the declaration of existence, and local roasting plants	This requirement aims to restrict the marketing activity to four categories of actors involved, because of their occupation, in the coffee production and marketing chain. The producers consulted report a strong presence of informal intermediaries, commonly called coxeurs (63%) alongside farmers' organisations (32%) (TAMI, 2025). This situation reveals shortcomings in the discharge of this obligation.	**1. Collection and verification of documents** **Systematically collect documents from the following actors:** a) Producers, producer organisations, and economic operators • Registration receipt • Declaration of existence **b) Local roasting plants** • Certificate of expertise • Inspection report **2. Field verifications** Visits to plants or points of sale
	Any green coffee buyer must hold a certificate of existence and a professional card issued by the interprofessional association	This requirement aims at enabling the public administration and the interprofessional association to have a good knowledge of the national pool of coffee traders. The producers consulted report a strong presence of informal intermediaries, commonly called coxeurs (63%) alongside farmers' organisations (32%). This situation allows risks of illegality to persist in this segment of the coffee marketing chain.	**1. Collection and verification of documents** **Systematically collect for actors involved in the supply chain:** • Declarations of existence • Professional cards • Exporter code number **2. Field visit** Data collection, on a sample basis, from producers, producer organisations, economic operators to check the quality and identity of buyers
	Sales of shelled or parchment coffee, door-to-door or night sales and purchases of green coffees, allocation of quotas to exporters, and transfers to dominate a buy zone are prohibited	The requirement is intended to outlaw practices that are likely to alter the quality of coffee on export, or to taint its marketing process. The fact that the segment of direct purchases from producers is dominated by coxeurs suggests serious risks on this matter.	**1. Collection and verification of documents** **Systematically collect the following documents for the actors in the supply chain**: • Inspection note • Sales slip **2. Field visit** Data collection, on a sample basis, from producers on commercial practices in their locality.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Product quality and packaging	The practice of mixing botanical species or crops is prohibited	This requirement aims at ensuring a certain quality of the coffee exported. The fact that the segment of direct purchases from producers is dominated by coxeurs suggests serious risks with regard to the integrity of species and crops.	**1. Collection and verification of documents** Systematically collect the following documents for the actors in the supply chain: • Inspection note • Sales slip • Phytosanitary certificate **2. Field visit** Data collection, on a sample basis, from producers, buyers and factory owners on coffee processing, packaging, and storage.

IV.6. Category 6: Labour law*

Coffee is in general a labour-intensive crop, ripe cherries being picked by hand and dry-treated in most cases. Plantations, which in the past had been larger, were organised in a semi-autonomous way, with geometrical plots and areas for pastures and workers, among others. However, due to the structural challenges facing the coffee industry for almost 30 years, there are only remains of those large plantations left, with impacts on the employment structure in the sector. Although the sector seeks to revitalise itself, thanks especially to producer rejuvenation programmes, jobs mostly remain informal.

IV.6.1. Requirements calling for simplified due diligence actions

The legal requirements below apply only in the case of wage labour. In several cases, they are not applicable in the sector of coffee production, where family plantations dominate. A first step in the due diligence process is to determine, at the level of the sourcing area, whether there is wage labour. This can be achieved, for all producers, through collecting information on the type of employment of the plantation workers using a questionnaire. This questionnaire can be filled out during systematic surveys or during the collection of plot geolocation data. Intermediaries can support this collection of data relating to producers and their employees. The questionnaire will also raise awareness amongst farmers about the issue of wage labour. If the result of this first step shows that there is no wage labour in the production basin, then no further due diligence action is recommended.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Working hours, rest periods, extra shifts, weekly rest	In all agricultural or allied companies, working hours are based on a total of 2,400 hours per year, i.e. forty-eight (48) hours per week.	Work in coffee plantations is based on the involvement of the members of the household as well as on a seasonal workforce. Production systems are usually family-owned farms combining coffee cultivation with food crops, involving women and children in complementary roles, although female labour is often underestimated[12]. However, the Labour Law does not specifically regulate piecework. The provisions relating to working hours do not apply to piecework. The comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025, as well as field surveys (TAMI-2025) indicate that this requirement is usually met when it comes to permanent workers, as the work in coffee production does not take place overnight and on the 24-hour weekly day of rest (Sunday or another day depending on the religious denomination. However, coffee farming being dependent on the harvest seasons, producers and plantation workers are often required to work more during harvest seasons. Extra shifts are common for temporary workers or day workers employed at the coffee harvest. These workers can be required to work long days, sometimes well beyond normal hours, to meet the harvest demand and other activities related to coffee production (like fermentation, washing, sorting, drying or transport).	**1. At the level of the sourcing area:** **Collection of relevant data** Possibly consult the reports on the detailed analysis of the coffee supply chain, including discussions on workers' rights) and Human Rights Watch (reports on human rights in various sectors, including coffee, highlighting working conditions), as well as potential reports produced by national and local NGOs. Confirm if the sourcing area does not present a particularly high risk of non-compliance with working hours, impediments to freedom of association of workers, or remuneration below the legal minimum. Check whether employment contracts do exist, even though oral contracts are current practice (ensure that those contracts mention working hours that comply with the legal requirement) Check the prevailing wage level with a sample of employees

12 Hélène Guétat-Bernard, "Cultures du café et dynamiques des rapports de genre en pays Bamiléké au Cameroun : effet de similitude avec la situation kikuyu au Kenya", Les Cahiers d'Outre-Mer [Online], 243 | 2008, put online on 1st July 2011, accessed on 20 January 2026. URL: http://journals.openedition.org/com/5351; DOI: https://doi.org/10.4000/com.5351)

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Workers' rights	Workers have the right to join a trade union of their choice within the framework of their profession or branch of activity and may not be subject to sanctions for this reason.	The study did not reveal any cases of deprivation of freedom of trade union membership.	**Stakeholder consultations** Where appropriate, consult local organisations working for workers' rights to obtain information on working conditions and possible cases of failure to respect working hours, impediments to freedom of association of workers, or remuneration below the legal minimum, including local NGOs, workers' rights associations, and trade unions. **2. At the level of the production plots:** **Collection and verification of documents** Possibly collect, on a sample basis, in case workers are employed in the plantation, documents relating to the freedom of association of workers employed by coffee producers (procedures illustrating the association and consultation mechanisms, list of staff representatives, minutes of meetings between staff representatives and the employer, grievance registers, collective agreements, etc.)
Workers' remuneration	For people employed on a piecework basis, their remuneration should be so calculated that it provides a worker of average capacity, working normally, with a wage at least equal to that of the worker engaged in similar work and paid by unit of time.	The comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025, as well as field surveys (TAMI-2025) indicate that few employees are permanent in the coffee-growing sector in Cameroon and as a result, they are paid the Guaranteed Minimum Interprofessional Wage (SMIG). Workers who carry out tasks on the plots earn the SMIG or more at the end of the month. Moreover, as the SMIG is set at a fairly low level, it is respected and often even exceeded.	
	If workers are employed on a permanent basis, their monthly remuneration must not be less than the statutory minimum.	The comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025, as well as field surveys (TAMI-2025) indicate that this requirement is met. Moreover, as the SMIG is set at a fairly low level (FCFA 45,000)[13], it is respected and often even exceeded.	

13 Decree No. 2023/00338/PM of 21 February 2023 establishing the Guaranteed Minimum Interprofessional Wage (SMIG).

IV.6.2. Requirements calling for enhanced due diligence actions

The legal requirements below apply only in the case of wage labour. In several cases, they are not applicable in the sector of coffee production, where family plantations dominate. A first step in the due diligence process is to determine, at the level of the sourcing area, whether there is wage labour. This can be achieved, for all producers, through collecting information on the type of employment of the plantation workers using a questionnaire. This questionnaire can be filled out during systematic surveys or during the collection of plot geolocation data. Intermediaries can support this collection of data relating to producers and their employees. The questionnaire will also raise awareness amongst farmers about the issue of wage labour. If the result of this first step shows that there is no wage labour in the production basin, then no further due diligence action is recommended.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Workers' rights	Under equal working conditions and professional competence, all workers receive an equal wage, regardless of their origin, sex, age, status and religious denomination.	Even though the workforce in coffee cultivation was historically based on family employment, agricultural wage labour emerged with the establishment of large colonial plantations. Today, even though there are no longer colonial plantations and the size of plantations have reduced, producers resort to wage employment, although mainly temporary (clearing, maintenance, harvesting, and sorting). In some large production basins like the Moungo or Noun, producers resort to internally displaced workers from crisis regions because of their availability. However, the study did not find any cases of wage discrimination against them. Women, although very involved in coffee farming (harvesting, washing, drying, and sorting) often have less access to resources, land and training. The case of the Coopérative Agricole des Femmes Rurales du Littoral, de l'Ouest et du Sud-Ouest (COOPAFERLOS) that supports female coffee growers is an isolated one.	**1. At the level of the sourcing area:** **Collection of relevant data** • Consult the public reports of organisations specialising in these issues, in particular the Cocoa Barometer (detailed analyses of the coffee supply chain, including discussions on women's rights). • Ensure that the sourcing area does not present particularly high risks of harm to the health and safety of workers, lack of appropriate provisions for the handling of chemicals or failure of employers to provide appropriate equipment. • Ascertain the existence of a certificate of compliance of the machinery and equipment. • Collect reports from labour inspectors if available.

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Occupational health and safety	The employer must look after the health and safety of employees and ensure that the working environment, conditions, and equipment are adequate.	Although the activities in the coffee sector in Cameroon are not mechanised and the activities are seasonal and on a piecework basis, safety and health issues are nevertheless relevant with regard to certain equipment used for maintenance operations (pruning shears), for pulping and the application of chemicals.	**Stakeholder consultations** • Consult local organisations and trade unions working for workers' rights to obtain information on the working conditions and possible cases of discrimination at work, harm to the health and safety of workers, lack of appropriate provisions for the handling of chemicals or failure of employers to provide appropriate equipment.
	Appropriate arrangements must be made in all workplaces where hazardous substances are produced, handled, used, stored, transported.	The comments gathered during the presentation of the report of the analysis of legal requirements relevant to coffee production, Ebolowa, November 2025, as well as field surveys (TAMI-2025) indicate that in coffee plantations, tools and instruments for spreading fertilisers, fungicides, and insecticides are often handled without proper precautions. **N.B. This study interpreted the 1984 Order as also applicable to piece-workers.**	**2. At the level of the production plot** **Collection and verification of documents** • Manuals of procedures relating to the health and safety of workers • Manuals of procedures relating to the handling of chemicals • Manuals of procedures relating to workers' equipment **In the event that one or more permanent or long-term employees on the plantation are displaced workers and/or women:** • List of workers/employer register • Employment contracts (verify the expected wages) • Proof of payment of workers (verify the differences in wages with employees who do not belong to the aforementioned groups)

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
	Effective equipment must be provided to workers according to the specifics of the work to be performed.	Coffee farming involves phytosanitary treatments, including the use of herbicides and insecticides. Furthermore, in the coffee production basin, several shelling plants are set up. Several plants and cooperatives specialise in coffee shelling and processing. A few illustrative cases include the Central Union of West Region Agricultural Cooperatives (UCCAO), which has shelling plants in Dschang, Foumban, Foumbot, Mbouda, and Bafoussam, the North West Cooperative Association in the North West, which has a processing unit (roasting, grinding), and several shelling industrial companies established in the Robusta coffee production basins. These companies must provide workers with essential personal protective equipment (PPE) including gloves, safety glasses, dust masks and masks against debris, safety boots, headphones or earplugs against noise from machinery, and appropriate work clothing to protect against cuts and dust, in order to prevent the risks of skin, eye, respiratory, and hearing injuries associated with shelling, cleaning, and sorting operations.	**Field verifications** **In the event that there is one or more employees on the plantation or in shelling plants:** • Ensure that working conditions and work equipment do not harm the health and safety of workers. • Ensure that appropriate arrangements are made for the handling of chemicals. • Ensure that appropriate work equipment is provided, especially in plants. • In the event that one or more permanent or long-term employees on the plantation are displaced workers, members of indigenous populations and/or women. • Ensure that wages are equal for all workers with equal working conditions and professional competence.

IV.7.Category 7: Human rights*

N.B. This category is specifically listed in Article 2 of the EUDR, but is not directly related to the objectives of the Regulation.

Human rights requirements in the coffee sector mainly concern the issues of child labour and the absence of forced labour.

Child labour on coffee plantations in Cameroon is a major issue, although it is sometimes perceived and defined as a socialising activity. According to the International Labour Organisation (ILO), child labour is defined as any activity that deprives children of their childhood and their potential, harming their physical and mental development (references: ILO conventions 138 and 182).

According to Cameroon's Labour Code, children are allowed to work from the age of 14, and those under 14 in coffee farms may do so within a family context marked by socialisation and learning. Also, field surveys did not specifically note child labour in coffee farms.

With regard to human rights, the majority of the relevant requirements relate to labour rights. The survey did not find any cases of sexual harassment or forced labour in the sector. The protection of indigenous peoples is enshrined in the Constitution. Furthermore, the Labour Code prohibits any form of discrimination based on origin, age, sex, status or religious denomination. However, cases of discrimination persist in the regions where these peoples live, particularly with regard to remuneration. Nevertheless, this requirement is also covered by the Labour Code and is dealt with in category 6.

IV.7.1. Requirements calling for simplified due diligence actions

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Human rights are observed according to national and international laws	The Constitution establishes the principle of protection of minorities and preservation of indigenous populations' rights	The Cameroonian Constitution of 18 January 1996 enshrines the protection of minorities and preservation of indigenous populations' rights. It promotes advocates for equality, non-discrimination, and cultural diversity management. The consultations carried out did not identify any form of discrimination in coffee production basins.	**1. At the level of the sourcing area** **Collection of relevant data** • Consult the public reports of organisations specialising in these issues, in particular Human Rights Watch (reports on human rights in various sectors, highlighting working conditions), the annual report of the National Commission on Human Rights and Freedoms, as well as potential reports produced by national and local NGOs

Legal requirements		Context and levels of implementation and risk	Recommended due diligence actions
Absence of modern slavery and forced labour	Except in the cases provided for by law, no deductions may be made from wages.	Consultations carried out show that although family labour is very common, the size of farms or the labour intensity usually requires hiring external workers. Up to 97.1% of respondents hire people who are not family members. In 92% of cases, job opportunities are temporary. Therefore, more than half of the people consulted claim they have no written contracts and pay their employees in an informal manner.	• Ensure that the sourcing area does not present a particularly high risk of modern slavery, forced labour or sexual harassment. • Consult framework documents and corporate policies or cooperative policies, certifications, which state the sanctions provided for in case of sexual harassment or gender-based discriminations. **Stakeholder consultations** • Consult local organisations working for workers' rights to obtain information on working conditions and possible cases of modern slavery, sexual harassment or forced labour, e.g. through deductions from wages by the producer in the sourcing area.
	Forced or compulsory labour is prohibited.	Consultations carried out as part of this work did not reveal any cases of forced labour in the sector.	
Women's rights are observed according to national and international law	It is prohibited to exert pressure on a worker or to coerce them in any way to obtain sexual favours.	Consultations carried out as part of this study did not reveal any cases of work performed under duress or pressure from a third party in coffee plantations.	**2. At the level of the production plots** Document collection and verification [in connection with wages]: Collect, on a sample basis, documents relating to the payment of wages of workers employed by coffee producers (procedures illustrating the payment of wages, lists of workers, employment contracts, pay slips or pay checklists, etc.).
	The employer should not discriminate on grounds of gender, particularly in terms of wage.	Although 95% of producers consulted claim they have no worker belonging to minorities, this situation seems to be the result of the absence of those populations in the areas concerned.	

IV.7.2. Requirements calling for enhanced due diligence actions

<table>
<tr><th colspan="2">Legal requirements</th><th>Context and levels of implementation and risk</th><th>Recommended due diligence actions</th></tr>
<tr><td rowspan="2">Absence of worst forms of child labour</td><td>Unless otherwise specified by the Minister for Labour, children under 14 years cannot be employed.</td><td>Children under 14 years are, however, employed in coffee plantations, but more and more in the family context.</td><td rowspan="2">At first, determine whether it is part of the family labour or a job.

At the level of the sourcing area:

Collection and verification of documents
• Consult the public reports of specialised organisations on these issues, in particular Human Rights Watch (reports on human rights in various sectors, including coffee), as well as potential reports produced by national and local NGOs, for example.
• Ensure that the sourcing area does not present a particularly high risk of labour involving children under 14 and posing risks to their health.
• Collect school maps of primary schools in the districts of the sourcing area to assess whether there is good school coverage or a lack of schools that increases the risk.

Stakeholder consultations
Consult local organisations that work for workers' rights to obtain information on the risk of labour involving children under 14 and posing risks to their health in the sourcing area.</td></tr>
<tr><td>Children do not take part in activities that are disproportionate to their physical and mental abilities, in deplorable conditions and which pose risks to their health</td><td>An order signed in November 2025 by the Minister of Labour and Social Security (MINTSS) determines the list of hazardous work prohibited for children in Cameroon. The order applies to any type of employment or economic activity, of whatever nature, paid or not, carried out by a child on their own account or that of a third party in a home or in a professional environment. Although children are involved in coffee farming, activities in the production of coffee are not particularly dangerous for them.</td></tr>
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V. Consultations carried out

The results presented in this report were the subject of the following exchanges and consultations:

- Methodology launching and validation workshop on 2 October 2025 in Yaoundé;
- Between October and November, 70 coffee producers, including 9 women and 61 men, were consulted in the West, Centre, Littoral, East, North-West and South-West regions. In addition, resource persons were consulted. These were:
  - Public entities (MINFOF, MINFI/DG Customs, MINFI/DGI, MINCOMERCE, MINADER, MINT, MINAS and MINTSS, MINDCAF);
  - Operational actors (Project for the Relaunch of the Coffee Industry [PARF-Café], NCCB, CCIC, CCODEF, GEX, CERTISPEC Services Cameroon, SGS, Global control…);
  - Producers/producer groups and/or traders (Central Union of West Region Agricultural Cooperatives [UCCAO], SOCOPROCA, GIC COPACAM, GRASSFIELD COOP-CA…);
  - Certification bodies (Rainforest Alliance);
- Workshop to validate the legal requirements relevant to coffee production in Cameroon, with respect to EUDR, on 9 and 10 December 2025 in Ebolowa;
- Workshop to present recommendations on due diligence for the coffee industry in Cameroon, on 17 February 2026 in Yaoundé.

