

Legal requirements relevant for the coffee value chain in Cameroon with respect to EUDR

FINAL REPORT

Project Sustainable Agriculture for Forest Ecosystems (SAFE) in Cameroon

Global Gateway
Co-funded by the European Union
Team Europe Initiative on Deforestation-free Value Chains
german cooperation
DEUTSCHE ZUSAMMENARBEIT
Ministry of Foreign Affairs
Implemented by giz Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
In partnership with MINEPAT

Published by the

Deutsche Gesellschaft für
Internationale Zusammenarbeit (GIZ) GmbH

Registered offices
Bonn and Eschborn, Germany

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As at
November 2026

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Content

Preface 6

I. Background 8

II. Objective 9

III. Methodology for identifying relevant national requirements 9

III.1. Collection of legislative and regulatory texts 9

III.2. Legal requirements relevant under the EUDR 9

III.3. Legal requirements relevant in the national context of coffee production 10

III.4. Analysis of legislative and regulatory texts 11

III.4.1. Approach 11

III.4.1. Outline of the methodology for conducting the analysis of legal requirements applicable to coffee 11

IV. Inventory of the legal requirements relevant to the coffee produced in Cameroon 12

Category 1: Land-use rights 12

Category 2: Environmental protection 15

Category 3: Third parties' rights 20

Category 4: Free, Prior and Informed Consent (FPIC) 23

Category 5: Taxation, fight against corruption, trade and customs 23

Category 6: Labour law* 29

Category 7: Human rights* 33

V. Identification of institutions competent for the issuance and verification of legal documents required 36

VI. Areas of ambiguity or contradiction between the Cameroonian Law and European requirements 36

VII. Consultations carried out 37

Preface



The coffee sector plays an important role in Cameroon's rural economy, making a significant contribution to the livelihoods of thousands of male and female producers, as well as to the development of processing, marketing and export activities. In an international context characterised by increasingly stringent requirements for sustainability, transparency and traceability in agricultural supply chains, strengthening the competitiveness and resilience of this sector is a major priority for Cameroon.

The entry into force of the European Union Regulation on products derived from deforestation-free supply chains (EUDR) introduces new requirements for operators and other stakeholders involved in accessing the European market. For coffee, these requirements relate in particular to the legality of production, product traceability back to their origin, the geolocation of production plots, verification that no deforestation has taken place, and the implementation of a due diligence process to identify, assess and, where necessary, mitigate risks of non-compliance.

In this context, it is essential to establish a clear and shared understanding of the legal requirements applicable to coffee production and marketing in Cameroon, as well as how these requirements relate to those of the EUDR. It is against this background that this study was conducted under the Sustainable Agriculture for Forest Ecosystems (SAFE) project. The project is funded by the Government of Netherlands and the European Union and is implemented in Cameroon through German Development Cooperation, specifically by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH.

The study has contributed to a better understanding of the legal and regulatory framework governing Cameroon's coffee sector, identified the requirements relevant to the EUDR, and highlighted the key areas requiring attention from the various stakeholders across the value chain, with a view to achieving the highest possible level of alignment with the EUDR. It also provides recommendations for implementing due diligence, with the aim of facilitating the collection, verification and documentation of the required information, as well as the identification and management of potential non-compliance risks.

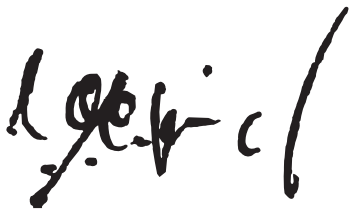
Beyond its regulatory dimension, this document should be viewed as a tool to

support the sector as a whole. Its purpose is to foster a common understanding of the responsibilities of the various stakeholders-including producers, producer organisations, cooperatives, buyers, operators, exporters and public institutions-and to support the development of traceability, transparency and sustainability mechanisms suited to the Cameroonian context. Establishing such mechanisms will therefore be an important driver of improved competitiveness for Cameroonian coffee on international markets, while ensuring due regard for environmental protection.

The public sector welcomes the completion of this study, which forms part of ongoing efforts to strengthen the organisation, competitiveness and sustainability of Cameroon's coffee sector in international markets. Its implementation should be based on a coordinated and gradual approach, involving the various stakeholders and taking into account the realities and constraints encountered on the ground, particularly by exporters.

We hope that the findings and recommendations of this study will help strengthen the preparedness of Cameroon's coffee sector to meet the new requirements of international markets and, in particular, facilitate its sustainable access to the European market. They also provide a valuable basis for continuing dialogue among public authorities, private sector stakeholders, producer organisations, technical and financial partners, and all other stakeholders committed to building a more sustainable, transparent and competitive coffee sector.

I would like to commend the commitment of all the institutions, professional organisations, economic operators, producers and partners who contributed to this initiative, as well as the support provided by the SAFE/GIZ project in conducting this study.



Michael NDOPING

The Director General
National Cocoa and Coffee Board
(NCCB)

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.

As part of the implementation of its objective, which is to provide 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 are deforestation-free and legal. 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. 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.

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

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.

II. Objective

The present deliverable analyses the relevant legal standards of the coffee sector, and focuses on:

- Developing a comprehensive legal mapping of requirements applicable from (i) an exhaustive inventory of national laws, regulations, and standards (land tenure, environment, labour, taxation, customary rights, etc.) applicable to the coffee industry under the EUDR, and (ii) the identification of institutions competent for the issuance and verification of legal documents required.
- Analysing legal compliance in reference to the EUDR based on (i) a mapping of national legal requirements to the EUDR legality criteria, and (ii) an identification of potential areas of ambiguity or contradiction between the Cameroonian Law and European requirements.

III. Methodology for identifying relevant national requirements

III.1. Collection of legislative and regulatory texts

A documentary review was done to find the different legislative and regulatory texts likely to apply to coffee production and marketing in Cameroon, including the EU regulation directly related to the issue. The different websites of ministries and national institutions involved were used (National Cocoa and Coffee Board, NCCB, Cocoa and Coffee Inter-professional Council, CCIC, Cameroon Trade Portal, Cocoa and Coffee Sector Development Fund, CCODEF, MINCOMMERCE…), as well as websites of other international institutions that work in the sector, collect and disseminate legal information (FAO Lex, JuriAfrica, European Union…). An on-site investigation in the ministries involved, particularly MINCOMMERCE, helped find documents that are not published online.

For their better use, documents found were organised according to the pyramid of legal standards on the one hand, and according to their binding force on the other hand. Those documents were also presented depending on the extent to which they are referred to in the production and marketing of coffee from Cameroon.

III.2. Legal requirements relevant under the EUDR

- The EUDR defines the legality of commodities based on two criteria:
- The national legal requirements should only be related to the legal status of the production area
- Seven fields of law (for agricultural products) are concerned: (1) land-use rights, (2) environmental protection, (3) third parties' rights, (4) labour rights, (5) human rights protected by international law, (6) the principle of free, prior and informed

consent, including as set out in the UN Declaration on the Rights of Indigenous Peoples, and (7) taxation, anti-corruption, trade and customs regulations.

On 2 October 2024, the European Commission published a guidance document for the implementation of the EUDR. This document proposes to study the relevance of legal requirements through the below criteria:

- The requirements should only be related to the legal status of the production area (except for trade and customs rules) ;
- The requirements must be related to the objectives of the EUDR, that is fighting against deforestation, forest degradation, climate change, and biodiversity loss.

A literal interpretation of this guidance would result in a shorter list of legal requirements since all aspects of the labour law, as well as some human rights and third parties' rights, are not directly related to the objectives of the EUDR.

This guidance would, furthermore, extend the scope of regulations related to taxation and fight against corruption at stages of the value chains beyond the area of production, if these regulations help to combat deforestation. Moreover, regulations related to trade and customs would be relevant as long as they apply to the product in question.

It should be noted that the guidance of the Commission is not legally binding. As specified in the guidance document itself, it does not supersede, add to, or amend the provisions of the EUDR, which sets out the legal obligations. Each EU Member State will adopt its own approach to control operators' compliance with the EUDR. At the end of the day, only the judge, in each EU country, has the power to interpret the European regulation in a binding manner and to determine the scope of the legality criterion.

In this context, this study adopted a precautionary approach, which considers all the areas of law listed in Article 2.40 and includes all requirements deemed relevant in those seven areas. Moreover, it covers the requirements relating to taxation, fight against corruption, trade and customs, beyond the area of production.

The study highlights, by an asterisk, the requirements that do not directly relate to the objectives of the EUDR. Thus, this comprehensive approach will enable final users to choose the scope of their work depending on their understanding of the EUDR and the guidance provided therewith. Under the EUDR, the operator is responsible for performing due diligence to ensure that the products they place on the market pose a negligible risk of illegality. It is therefore up to them to decide which legal requirements they want to incorporate into their due diligence system.

III.3. Legal requirements relevant in the national context of coffee production

All legal requirements identified were a priori considered as relevant, unless it can be clearly determined that:

- The legal requirement is not related to the coffee plot or to the workers and third persons concerned by the plot (except for trade and customs rules),

- The legal requirement is not relevant in the context of a family-dominated small-scale coffee production,
- The legal requirement is of general scope, has no corresponding implementing legislation that helps to make it operational or to monitor its implementation, and/or is covered by other, more specific requirements.

III.4. Analysis of legislative and regulatory texts

III.4.1. Approach

The exegetical (analysis of legislation according to its letter and spirit), historical (consideration of historical elements that influenced the adoption of texts), and teleological (analysis of texts according to their purpose) approaches were used to analyse all texts found. This analysis allowed: (i) the identification of legal and regulatory requirements related to coffee production and/or marketing in Cameroon, and (ii) the identification and ranking of potential challenges in terms of clarity or implementation of these legal requirements and/or in terms of lack of information, data and/or a document to demonstrate the zero or negligible risk of legal non-compliance. The analysis allowed to draw up a table of the legal and regulatory requirements for the production and marketing of coffee. This table includes legal requirements, documents, information or data required for each of the texts, and the stratified risks of non-compliance.

III.4.1. Outline of the methodology for conducting the analysis of legal requirements applicable to coffee

The legality criteria of the EUDR should be recalled here, with an emphasis on the fact that:

- The legality requirement of the EUDR refers to the legislation in force in the producing country;
- This is not a reference point for a legislative reform or the adoption of new laws to address the identified areas before compliance can be achieved;
- Legality should be measured against the existing legal framework;
- If the law exists, there is a legal obligation; if the law does not exist, then there is no legal obligation;
- If the law does not exist, this does not mean that there is illegality or non-compliance;
- The absence of documentary evidence does not imply illegality or non-compliance.

IV. Inventory of the legal requirements relevant to the coffee produced in Cameroon

Les tableaux ci-dessous présentés par domaine de droit font état des exigences The tables presented below by area of law outline the requirements considered relevant and irrelevant, and the justifications provided by the stakeholders consulted, for cocoa produced in Cameroon. Those areas are as follows: (i) land-use rights, (ii) environmental protection, (iii) third parties' rights, (iv) free, prior and informed consent (FPIC), (v) taxation, fight against corruption, trade and customs, (vi) labour law, and (vii) human rights.

The requirements marked with an asterisk do not directly relate to the objectives of the EUDR.

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.

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 in the West, North-West, Adamawa 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

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Land rights and/or land-use rights are secure					
Land ownership is clearly defined and respected	Land ownership is proven by a land certificate established in accordance with the laws and regulations in force	• Ordinance No. 74 of 6 July 1974 to establish land tenure (Art. 17); • Decree No. 76 laying down the terms for obtaining a land certificate (Art. 1); • Decree No. 76/165 of 27 April 1976 to establish the conditions for obtaining land certificates, amended and supplemented by Decree No. 2005/481 of 16 December 2005. • Circular Letter No. 0002/ MINDCAF/CAB/LC of 9 February 2024; • Circular Letter No. 0003/ MINDCAF/CAB/LC of 2 April 2025 creating a "Letter of no objection" from first- or second-class traditional rulers on surface areas of 20 ha.	Relevant	Land certificate	Ministry of State Property, Surveys and Land Tenure
The farmer has land use rights	If one does not have legal ownership, they must have peaceful occupation and use rights over the plot	• 1974 Ordinance to establish land tenure (Art. 17)	Relevant	- Lease Temporary concession	• MINDCAF • Presidency of the Republic

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Where applicable, expropriation was carried out as required by law	The agricultural promoter beneficiary of an expropriation in the public interest is required to pay a just and prior compensation to people affected.	• 1985 Law on expropriation in the public interest (Art. 4 and 6)	Irrelevant. The requirement is not relevant as the State will not expropriate and then produce coffee. The government focuses on improving existing agricultural practices rather than on the destructive expansion of forests, through funding projects like those of CAFI, CCODEF, and the SAFE project.	NA	NA
The legal requirements for land use and management are met					
Agriculture is permitted on the plot **Agriculture is permitted on the plot**	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.	• 1995 Decree on forest regime (Art. 26 (3))	Relevant	No specific document Maps can be used	NA
	Any activity in a permanent forest estate must comply, as appropriate, to its development plan or to its simple management plan.	• 2024 Forestry Law (Art. 26; 27 (3))	Relevant	No specific document Maps can be used	NA

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%)[2] . 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. Moreover, 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 like cotton, 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 completely 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), not through the establishment of new plantations. 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.

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

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
Environmental requirements applicable to agricultural activities					
Only authorised pesticides are used	Only approved pesticides and insecticides are used by farmers following the planned technical itinerary.	• Law No. 2003/003 of 21 April 2003 relating to phytosanitary protection (Art. 3, 20, 21, 22, 24, 25, 27, 33) • Decree No. 2005/0772/PM of 6 April 2005 to lay down terms and conditions for the approval and control of phytosanitary products (Art. • Decree No. 2011/2584/PM of 23 August 2011 to lay down conditions for soil and subsoil protection (Art. 6, 9, 11, 12)	Relevant	No specific document, but pesticide monitoring sheets can be used	NA
	Pesticide applicators are authorised.	• Law No. 2003/003 of 21 April 2003 relating to phytosanitary protection (Art. 20) • Decree No. 2005/0772/PM of 6 April 2005 to lay down terms and conditions for the approval and control of phytosanitary products (Art. 40)	Relevant	Authorisation	MINADER
Only authorised fertilisers are used	Only approved fertilisers products are used in farms following the planned technical itinerary.	• Law No. 2003/007 of 10 July 2003 regulating activities of the fertiliser sub-sector (Art. 07, 08, 09, 12) • Decree No. 2011/2584/PM of 23 August 2011 to lay down conditions for soil and subsoil • protection (Art. 6, 9, 10, 12) • protection (Art. 6, 9, 10, 12)	Relevant	Fertiliser and pesticide monitoring sheet	Producer

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
Water resources are protected and used as required by law	The spillage, burial or dumping of agricultural waste likely to	• Law No. 98/005 of 14 April 1998 on the water regime (Art. 4, 6)	Relevant	No specific document	NA
Waste is reduced and managed as required by law	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.	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 42) • Decree No. 2012/2809/pm of 26 September 2012 to lay down conditions for sorting, collecting, transporting, recovering, recycling, treating and final disposing of waste	Relevant	No specific document	NA
sols Soils are managed as required by law	Any activity related to soil use is carried out in such a way as to avoid or reduce soil erosion and desertification.	• Decree No. 2011/2584/PM of 23 August 2011 to lay down conditions for soil protection (Art. 3)	Relevant	No specific document	NA
Air contamination is avoided as required by law	It is prohibited to compromise air and atmosphere quality.	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 21). • Decree No. 2011/2582/PM of 23 August 2011 to lay down conditions for the protection of the atmosphere	**Irrelevant:** The 2011 Decree to lay down conditions for the protection of the atmosphere, which also provides for the implementing provisions of article 21 of the framework law, lists a range of institutions subject to its provisions, and coffee plantations	NA	NA

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
Protection of forest ecosystems and wildlife					
The conversion of forests is consistent with the legal requirements	The clearing, of all or part, of a forest designated for coffee cultivation is subject to the total or partial declassification of said forest	• Law No. 2024/008 of 24 July 2024 to lay down forestry and wildlife regulations (Art. 17 (1	Relevant	Declassification act	Prime Minister
	Without prejudice to the exercise of land use rights, timber cutting in forests of the national estate requires obtaining a sale of cutting rights, art. 81(1), a license to operate, art. 86(1), or a personal cutting authorisation, art. 94 (1)	• Law No. 2024/008 of 24 July 2024 to lay down forestry and wildlife regulations (Art. 74-76 and 77) • 1995 Decree on forest regime (Art. 81(1), 86(1), and 94(1))	Relevant	• Sale of cutting rights • License to operate • Personal cutting authorisation	MINFOF
	In community forests, any land clearing must be carried out in accordance with the Simple management plan.	• 1995 Decree on forest regime (Art. 30 and 31)	Relevant	No specific document	MINFOF
The conversion of forests is consistent with the legal requirements	In private forests, any land clearing must be carried out in accordance with the Simple management plan.	• Decree implementing the forest regime of 1995 (Art. 34(2))	**Irrelevant:** Not only private forests are rare, but no coffee plantations were identified in such spaces.		

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
An environmental impact assessment was carried out where required by law	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.	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 17); • Decree No. 2013/0172/PM to lay down terms and conditions for conducting environmental and social audit (Art. 3 (1)); • Order No. 00001/MINEPDED of 8 February 2016 to lay down the various categories of operations whose implementation is subject to an environmental and social assessment (Art. 4 (IV), Art. 5 (IV); • Order No. 0002/MINEPDED of 9 February 2016 defining the standard framework of the terms of reference and the content of the environmental impact notice (Art. 10); • Law No. 2024/008 of 24 July 2024 to lay down forestry and wildlife regulations (Art. 17 (2)).	Relevant	Certificate of environmental compliance	
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	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 62)	Relevant	-	-

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, not a lot of coffee plantations in Cameroon reach such proportions, which makes these requirements relevant only in a very limited number of cases. Also, coffee farming is often an agroforestry practice, involving the single stem pruning system and the combination with food crops. While income from coffee is very often managed by men, women for their part control food crops, which guarantees them sources of income and means of subsistence. In localities like the West of Cameroon, there is actually a women's relationship to the market economy through the cultivation and marketing of food crops[3]

In the East region where there is a relationship between coffee cultivation and indigenous peoples, those peoples, especially the Baka, face the loss of their lands and the lack of access to resources. The pressure from large plantations and cash crops, including coffee grown on lands that are often managed by other actors, creates conflicts in the use and makes living together difficult for local populations , which raises the issue of the right of those peoples to a healthy environment.

3 Guétat-Bernard, Hélène. "Culture du café et transformations des rapports de genre en pays bamiléké au Cameroun". Du grain à moudre, edited by Christine Verschuur, Graduate Institute Publications, 2011, https://doi.org/10.4000/books.iheid.6755.

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
Substantive rights					
Sites, resources, and habitats of cultural, archaeological, or historical significance, or of religious/sacred significance to the traditional cultures of the communities affected by the operations, are identified and protected as required by law.	Coffee farming should contribute to the conservation, protection, enhancement, promotion, and transmission of cultural heritage.	• Law No. 2013/003 of 18 April 2013 governing cultural heritage (Art. 2).	**Irrelevant:** Cases of coffee plantations on site or habitats of cultural, archaeological, historical significance, or religious significance were not reported in the literature and at the end of the interviews	No specific document	NA
The rights of local communities to a healthy environment are observed	Everyone has the right to a healthy environment.	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 5) • The constitution of Cameroon (Preamble)	Relevant	No specific document	NA
Procedural rights					
Right to access information on the environment	Any person who, by their actions, creates conditions likely to harm human health and the environment, is required to ensure or to arrange for the elimination thereof.	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 43)	**Irrelevant:** This requirement applies to large-scale farming. Coffee farming is carried out on a smaller scale and below the legislated threshold for conducting environmental impact assessments. Since these assessments include the obligation to inform the local communities, this obligation does not apply to coffee cultivation. In practice, producers are never required to inform about their waste management.	NA	NA

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
Right to claim compensation in case of harm	Any person who produces or holds waste, is also required to ensure that information on the impact of production, holding, disposal, or recycling of waste on the environment and public health is made available to the public.	• Law No. 96/12 of 5 August 1996 on the framework law on environmental management (Art. 9 (d), 77, 78)	**Irrelevant:** As practised, coffee farming has no significant negative impacts on heath or the environment	NA	NA
Local communities must be informed and consulted during the EIA process as required by law	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.	• 2013 Decree laying down the terms and conditions for conducting impact assessments (Art. 20, 21, and 22)	Pertinent	Report of the consultation meetings Certificate of environmental compliance	Operator

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.

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent authority
FPIC					
The FPIC is obtained when the rights of the indigenous peoples or local communities are affected	Concerning projects that affect local and indigenous communities, the participation of these through public consultations and hearings is required.	• 2013 Decree on conducting impact assessments (Art. 20, 21)	Relevant	Report of the consultation meetings	Operator

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

The customs and taxation legislation related to coffee production, marketing, and export is specified by the General Tax Code updated under the successive finance laws. It establishes the legal regime of the taxes that apply to coffee producers with respect to income from the sale of their production. It also lays down the exemptions which producers can claim within the context of the facilities granted under the incentives for agricultural activities like the exemption from the land property tax for agricultural plots or the purchase of some inputs.

The legal regime for the marketing of coffee, as far as it is concerned, is laid down by several texts among which Law No. 2004/025 of 30 December 2004, amending and supplementing certain provisions of Law No. 95/11 of 27 July 1995 on the organisation of trade in cocoa and coffee. Among the regulatory texts, there can be mentioned the Decree No. 2005/1213/PM of 27 April 2005 to regulate the packaging and marketing of green coffees, as well as Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 to lay down terms and conditions for the marketing, transport, and storage of green coffees. The legal regime for the marketing of coffee sets the rules applicable in the context of the sale and export of these coffees. Of particular note is the obligation to report the volumes, quality, types, and prices of products purchased, and the prohibition of mixing species or crops.

Corruption, meanwhile, is punishable under Law No. 2016/007 of 12 July 2016 relating to the Penal Code, notably in article 134.

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Taxes and duties are paid					
Land taxes, value-added taxes, taxes on corporations, and export taxes, royalties, and fees are paid	The exercise of the activity of coffee production is subject to a set of tax obligations related to the production company (corporate tax, synthetic general tax, license, personal income tax)	• General Tax Code (Articles 2, 24, 55, 122, C8); • Law No. 2025/012 of 17 December 2025 on the Finance Law of the Republic of Cameroon for the 2026 financial year	**Irrelevant:** The State does not systematically compel coffee producers to comply with their tax obligations.	NA	NA
	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.	• General Tax Code (Articles 2, 24, 55, 122, C8) • Finance Law (Law No. 2025/012 of 17 December 2025 on the Finance Law of the Republic of Cameroon for the 2026 financial year)	Relevant	• Receipts, • Certificate of tax compliance, • Certificate of exemption, as necessary.	Ministry of Finance
	Some products and goods related to the activity of coffee production are exempt from taxes and duties.	• General Tax Code (Article 122)	**Irrelevant:** Given that coffee farming is exempt, there is no requirement for which the compliance must be assessed.	NA	NA

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
	All coffee exports must be recorded in terms of volumes, quality, type, and price for statistical purposes	• Law No. 2004/025 of 30 December 2004 (Art. 10); • Order No. 0002/MINCOMMERCE/CAB of 20 January 2016 (Art. 15) • Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 • Law No. 2016/004 of 18 April 2016 governing foreign trade in Cameroon; • 2024 Order, Law on foreign trade; • Decree No. 2005/1213/PM of 27 April 2005	Relevant	Records Registration receipt	Ministry of Trade
Customs and trade					
Customs duties are paid, commercial quotas and regulations are observed	The coffee exporter must have a certificate of tax compliance	• General Tax Code (Art. L2 ter 2) • Law No. 2004/025 of 30 December 2004 • General Tax Code	Relevant	Certificate of tax compliance	Ministry of Finance
Compliance with the requirements for the quality of the product	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%.	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (article 9)	Relevant	Sales slip	Factory owner
	Coffees must be bagged in bags complying with packaging standards.	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (article 9)	Relevant	Sales slip	Factory owner

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Compliance with the legal requirements for trade restrictions	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	• Law No. 2004/025 of 30 December 2004 (Art. 4 (1) and Art. 10); • Order No. 0002/MINCOMMERCE/CAB of 20 January 2016 (Art. 3 (1) and Art. 18)	Pertinent	• Certificate of registration • Certificate of existence • Certificate of expertise • Inspection report	Ministry of Trade CCIC NCCB
Compliance with the legal requirements for trade restrictions	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	• Law No. 2004/025 of 30 December 2004 (Art. 4 (1) and Art. 10); • Order No. 0002/MINCOMMERCE/CAB of 20 January 2016 (Art. 3 (1) and Art. 18)	Relevant	• Certificate of registration • Certificate of existence • Certificate of expertise • Inspection report	Ministry of Trade CCIC NCCB
Compliance with the legal requirements for trade restrictions	Any green coffee buyer must hold a certificate of existence and a professional card issued by the interprofessional association	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (articles 5, 6, and 26)	Relevant	Professional card issued by the CCIC, and certificate of existence and an exporter code number assigned by NCCB	Cocoa and Coffee Inter-professional Council (CCIC) and National Cocoa and Coffee Board (NCCB)

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Compliance with the legal requirements for trade restrictions	The practice of mixing botanical species or crops and collusion between factory owners or exporters to impose a single price on producers are prohibited	• Order No. 0002/MINCOMMERCE/CAB of 20 January 2016 (Art. 2(2)) • Law No. 2004/025 of 30 December 2004 to organise the marketing of cocoa and coffee (Article 8 (1) and (2))	Relevant	No specific document	NA
	Sales of shelled or parchment coffee, door-to-door or night sales and purchase of green coffees, allocation of quotas to exporters, and transfers to dominate a buy zone are prohibited	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (article 10)	Relevant	• No specific document	NA
Compliance with the legal requirements for trade restrictions	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.	• Order No. 0002/MINCOMMERCE/CAB of 20 January 2016 (Art. 17(2))	Relevant	Inspection note Sales slip Phytosanitary certificate	National Cocoa and Coffee Board
Compliance with the legal requirements for trade restrictions	The export of green coffees is subject to the exit note after the operator has completed all administrative formalities, technical controls, and payment of agricultural levies or royalties required on the e-GUCE platform	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (article 34)	Relevant	• Certificate of exit note	DGD/MINFI (e-GUCE platform)

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Compliance with the legal requirements for trade restrictions	The export of dark beans, coffee chips, unprocessed residues, and samples of green coffees can take place with the authorisation of MINCOMMERCE.	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (article 27)	Relevant	Authorisation from MINCOMMERCE	MINCOMMERCE
Compliance with the legal requirements for trade restrictions	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	• Order No. 0096/MINCOMMERCE/CAB of 15 April 2024 (article 37)	Relevant	• Certificate of bank domiciliation • Bank statement for the last export	Financial institution

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. Thus, at the production level, the workforce mainly consists of family networks of villagers (community mutual aid). These farming systems, considered as reciprocal services producers render to each other, do not involve a relationship of subordination between owners, operators, and farmworkers, make most social law requirements unrealistic (that is most of the requirements identified below).

Legal sub-category	Legal requirement (summary)	Legal grounds	Relevance	Verification document	Competent institution
Workers' rights are observed					
Working hours, rest periods, extra shifts, weekly rest are observed	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.	• Labour Code (Art. 80)	Relevant	• Contract of employment • Employer's record • Note from the labour inspector	• Employee • Labour inspector • Employer
No discrimination based on sex or race, or against migrant workers	Under equal working conditions and professional competence, all workers receive an equal wage, regardless of their origin, sex, age, status and religious denomination.	• Labour Code (Art. 61)	Relevant	No specific document	NA
The freedom of association, right to organise, and right to collective bargaining are observed	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.	• Labour Code (Art. 4)	Relevant	No specific document	NA
Social security rights are observed	The employer is required to register themselves, and to report and register people they employ, and pay their contributions to the NSIF.	• 1974 Decree to implement the 1969 law (Art. 4, 12) • 1974 Ordinance to organise the NSIF (Art. 4) • 2015 implementing Decree on NSIF debt recovery (Art. 3, 69)	**Irrelevant:** The requirement is not applicable to coffee plantations that mostly resort to a family workforce, mainly informal, and on a piecework basis, which may make this requirement trivial	NA	NA

Legal sub-category	Legal requirement (summary)	Legal grounds	Relevance	Verification document	Competent institution
Equality between men and women is maintained					
The legal provisions relating to maternity and paternity leave are observed	The employer must grant a maternity leave to pregnant women, who should also receive a leave allowance	• Labour Code (Art. 84 (2))	**Irrelevant:** The requirement is not applicable to coffee plantations that mostly resort to a family workforce, mainly informal, and on a piecework basis, which may make this requirement trivial	NA	NA
The workers' remuneration is legal					
The remuneration is in line with the legal requirements	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.	• Labour Code (Art. 63)	**Relevant**	No specific document	NA
The remuneration is in line with the legal requirements	Employers are required to issue an individual payslip to workers when paying wages.	• Labour Code (Art. 69)	Irrelevant: Workers are hired on a piecework basis	NA	NA

Legal sub-category	Legal requirement (summary)	Legal grounds	Relevance	Verification document	Competent institution
Operations and activities are secured					
The legal requirements for health and safety in the workplace are met	The employer must look after the health and safety of employees and ensure that the working environment, conditions, and equipment are adequate.	• 1984 Order on hygiene and safety measures in the workplace (Art. 4, 8)	Relevant	No specific document	NA
Legal requirements concerning workers who handle chemicals and operate machines, and the access to appropriate safety and health trainings are respected.	Appropriate arrangements must be made in all workplaces where hazardous substances are produced, handled, used, stored, transported.	• 1984 Order on hygiene and safety measures in the workplace (Art. 97; 100; 102)	Relevant	No specific document	NA
Legal requirements relating to the provision of personal protective equipment to workers are met	Effective equipment must be provided to workers according to the specifics of the work to be performed.	• 1984 Order on hygiene and safety measures in the workplace (Art. 4; 37; 32; 42)	Relevant	No specific document	NA

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).

By reference to the Cameroonian legal framework, working hours, and job duties considered acceptable for children. 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.

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Human rights are observed according to national and international laws					
Human rights protected by international and national law, such as cultural or land rights of indigenous populations, the right to health, right to water, or the right to a healthy environment, are observed	The Constitution establishes the principle of protection of minorities and preservation of indigenous populations' rights	• The 1996 constitution of Cameroon, amended in 2008 (Preamble)	Relevant	No specific document	NA
Absence of child labour					
Children are not employed if below the legal age	Unless otherwise specified by the Minister for Labour, children under 14 years cannot be employed.	Labour Code (Art. 86)	Relevant	No specific document	NA
Children do not carry out hazardous activities as required by law	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	Labour Code (Art. 87, para. 2 and Art. 96)	Relevant	No specific document	NA
Children do not work night shifts, as required by law	Night work for women and children is prohibited in the sector.	• Labour Code (Art. 82, para. 2)	Irrelevant: Night work is not common in coffee production	No specific document	NA
Children do not work longer than required by law	Working children must rest 12 consecutive hours as a minimum	• Labour Code (Art. 82, para. 1)	Irrelevant: Requirement irrelevant to the industry as work is completely done in the daytime	Employee record	Employeur

Legal sub-category	Legal requirement	Legal grounds	Relevance	Verification document	Competent institution
Absence of modern slavery and forced labour					
Wages, benefits, documents, or goods shall not be used to restrict workers' freedom	Except in the cases provided for by law, no deductions may be made from wages.	• Labour Code (Art. 75, 77)	Relevant	No specific document provided for	
Workers are free to terminate their employment after prior notice	Forced or compulsory labour is prohibited.	• Labour Code (Art. 2, para. 3)	Relevant	No specific document provided for	NA
No person is held in slavery or required to perform forced labour	Forced or compulsory labour is prohibited.	• Labour Code (Art. 2, para. 3)	Relevant	No specific document provided for	NA
Women's rights are observed according to national and international law					
There is no sexual harassment	It is prohibited to exert pressure on a worker or to coerce them in any way to obtain sexual favours.	• Cameroon Penal Code (Art. 302-1)	Relevant	No specific document provided for	NA
There is no discrimination based on gender	The employer should not discriminate on grounds of gender, particularly in terms of wage.	• Labour Code (Art. 61 (2))	Relevant	No specific document provided for	NA

V. Identification of institutions competent for the issuance and verification of legal documents required

See table above

VI. Areas of ambiguity or contradiction between the Cameroonian Law and European requirements

According to article 3 of the Regulation, operators who place coffee or derived products on the EU market shall ensure that these were produced in accordance with the relevant legislation of the producing country. In other words, the legality requirement is appraised in light of the legislation in force in the producing country. It is therefore clearly understood that the EUDR does not intend to contradict the provisions of national laws in the producing countries. It is also not intended to bring about legislative reforms in the producing countries, even though countries may make use of the elements presented by the analysis of the national regulatory framework.

Nevertheless, difficulties inherent in the national regulatory framework can be identified:

- The absence of verification documents for the majority of legal requirements;
- Lack of administrative check to ensure that some requirements are met;

In light of the foregoing, the study of areas of ambiguity or contradiction between the Cameroonian Law and European requirements seems irrelevant in the context of this work.

VII. 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).

