

Assessment of producer–country early responses to the EU Deforestation Regulation: Evidence from eight case studies

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Highlights

This paper presents early evidence on how producer countries in Africa, Asia, and Latin America are responding to the EU Deforestation Regulation (EUDR) ahead of its application. Drawing on eight case studies, it highlights the broad range of actions already taken across different sectors and outlines opportunities to strengthen the regulation’s effectiveness as implementation advances.

Case studies:

- Cameroon cocoa
- Colombia coffee
- Ethiopia coffee
- Ghana cocoa
- Indonesia wood
- Lao PDR coffee
- Malaysia palm oil
- Thailand rubber

Methodologically, this synthesis uses qualitative evidence from EFI country expertise (2021–2025) captured through questionnaires and semi-structured interviews, and a review of events, reports, and development partner projects across the countries studied. A short methodological note can be found at the end of this report.

While acknowledging limitations related to case selection and attribution, as well as the need for broader and deeper research, the following observations emerged:

- **EUDR appears to function in the eight cases studied as a constructive external policy signal**, supporting institutional coordination, data and traceability system upgrades, and multistakeholder dialogue, including cross-sector and cross-border engagement.
- **EUDR awareness has increased significantly in these countries**, contributing to greater attention to deforestation risks, legality considerations, data and transparency gaps, and the specific challenges faced by smallholders.
- **Governments and private actors are progressively aligning** their traceability, forest data, and risk-assessment systems with EUDR information requirements, often by building on existing frameworks and infrastructure.
- **Differences in national preparedness appear to reflect sector structure and institutional capacity**, rather than market dependence alone. In several case studies, sector actors have continued to advance technical elements

supporting EUDR due diligence even where political messaging has been cautious or has placed limited emphasis on EUDR-related engagement.

- **Continued progress towards achieving sustainability goals** will depend on regulatory clarity and complementing measures targeting technical preparedness, sustained legal reforms, economic incentives, scaled support for smallholders, and international cooperation on legal and deforestation free supply chains.

What the early evidence shows

1. EUDR has supported institutional engagement in several contexts

- Formal coordination bodies were created specifically in response to the EUDR:
 - **Thailand** established a *High-Level Committee on the EUDR* with inter-ministerial representation to coordinate rubber, forestry, and trade responses.
 - **Malaysia** formed a *Special Committee on the EUDR* to strengthen sustainability compliance across key export sectors and coordinate with the EU, in response to the result of the EU's benchmarking.
 - **Ethiopia** created an *Intergovernmental Taskforce on EUDR preparedness* bringing together agriculture, forestry, trade, and labour authorities.
 - **Colombia** formed an *EUDR Government Response Group*, a *Technical Group*, and a *Technical Inter-institutional Roundtable on EUDR*, involving multiple ministries and the National Coffee Federation, development partners, and other stakeholders.
- Other governments embedded dialogue on EUDR preparedness into existing sector governance structures:
 - **Indonesia** integrated EUDR discussions on preparedness of the wood sector into the governance framework of the national timber legality assurance system (SVLK).
 - **Cameroon** used the *Sustainable Cocoa Committee* as a coordination platform for EUDR-related dialogue and developed a set of *Cocoa Actions* to promote sustainable cocoa production.
 - **Lao PDR** incorporated EUDR discussions into the *Forest Sub-Sector Working Group on Forestry*.

- Bilateral technical dialogues with the EU and awareness events took place in all countries and across all relevant sectors, involving a broad range of stakeholders.
 - **Ghana** hosted semi-annual EUDR technical events jointly with the EU Delegation, involving the *Ghana Cocoa Board (COCOBOD)*, traders, and civil society. Similar EU Delegation led exchanges on sustainable coffee occurred in **Colombia**.
 - **Indonesia** and **Malaysia** initiated an *Ad-hoc Joint Technical Working Group on the EUDR* with the EU.

The establishment of new multistakeholder and/or cross-sectoral task forces, the repurposing of existing coordination bodies, and repeated technical exchanges with the EU involving a broad range of stakeholders all occurred prior to EUDR application. This demonstrates early institutional mobilisation linked to the regulation and its deforestation objective. Even though producer-country governments are not the regulation's legal addressees, their early engagement and cross-sector coordination efforts signal a clear commitment to supporting domestic producers in maintaining access to increasingly regulated markets.

2. Steps are being taken to review and align national traceability and forest data systems

Government responses to the EUDR have largely focused on technical tools, system upgrades, and alignment efforts. In several cases, governments are adapting existing national systems originally designed for domestic sustainability, legal compliance, sector management, or trade promotion objectives. Furthermore, technical exchanges and dry-run exercises involving the EU Competent Authorities and private sector representatives have offered opportunities to assess how national information systems, such as those in Ghana and Ethiopia, can provide due diligence information to operators.

- **Ghana:** The rollout timelines of the *Ghana Cocoa Traceability System (GCTS)* were aligned with EUDR implementation timelines. The Ghana COCOBOD committed to providing *buyer-facing due diligence reports* based on GCTS data, explicitly framed as supporting EUDR compliance.
- **Malaysia:** Government-led assessments, in collaboration with an EU-funded project, examined to what extent the *Malaysian Sustainable Palm Oil (MSPO) certification*, *eMSPO*, and other tools of the palm oil sector provide EUDR-relevant information on geolocation, legality, and traceability. Adjustments

were initiated to enhance data coverage, transparency and system interoperability, including plans for the development of a unified *National Traceability System* that integrates certification, geolocation and transaction data to better match EUDR information requirements.

- **Indonesia:** The government initiated SVLK+, an expansion of the existing timber legality assurance system SVLK, adding plot-level traceability and transaction data to meet EUDR requirements. Indonesia has also explored the creation of a multi-commodity digital dashboard to compile and synchronise traceability data in response to deforestation-free market demands.
- **Thailand:** The Rubber Authority of Thailand (RAOT) reviewed its *rubber farmer registration and traceability system* to collect plantation and transaction data supporting traceability and compliance with EUDR-related requirements. The Government is also exploring the creation of a multi-commodity digital dashboard.
- **Forest data alignment:** All eight countries have had some engagement with the EU, including information exchanges with the Joint Research Centre on the EUDR forest definition and available maps and data, such as the 2020 Global Forest Cover Map.
- **Data development:** Some countries have produced or are in the process of developing new data and information systems that could support EUDR due diligence.
 - **Ghana** is developing a 2020 forest map for the cocoa growing regions using the EUDR forest definition.
 - **Cameroon:** the Cocoa and Coffee Sector Development Fund is piloting farm mapping, covering over 300,000 farms. While earlier initiated, it has sustained momentum as part of EUDR preparations.

3. Legal gap assessments have supported clarity on national frameworks

All eight countries have conducted legality or regulatory gap assessments to compare elements of the national legal frameworks against Article 2 of the EUDR.

- Sector-specific legality assessments were conducted for cocoa and coffee in **Cameroon, Colombia, Ghana, and Lao PDR**, supported by EU-funded technical assistance. In **Indonesia** and **Thailand**, assessments focusing on rubber, including smallholder production, were undertaken with private sector support.

- Across countries, these assessments have contributed to clarify how existing laws and regulations apply in practice, including identifying recurring issues such as:
 - Unclear or overlapping land tenure regimes.
 - Agricultural production occurring on gazetted forest land.
 - Gaps in the implementation of labour standards, including child labour risks.
- In some contexts, the primary purpose of the assessments has been to improve clarity and legal certainty, providing assurances to private sector actors regarding applicable legal requirements and related documents or permits. In a few cases, assessment findings have been referenced in ongoing policy or reform discussions, alongside pre-existing domestic priorities.
- Illustrative examples include:
 - **Lao PDR** advancing land and land-use reform processes, including land titling in forest areas, in relation to tenure-related issues identified through the assessment.
 - **Ethiopia and Thailand** implementing measures to reduce informality in coffee and rubber supply chains respectively.
 - **Cameroon and Ethiopia** reinforcing child labour provisions in the legal frameworks.

4. Preparedness is better coordinated in sectors with well-established institutional structures

Evidence shows that countries with centralised sector authorities or strong producer organisations have been able to move more quickly and at scale. Examples of institutional structures involved in EUDR preparedness are:

- **Ghana:** COCOBOD centrally manages cocoa traceability and farmer registration.
- **Malaysia:** Palm Oil Board (MPOB) closely oversees the sector and supports mandatory MSPO certification.
- **Indonesia:** Ministry of Forestry provides with the SVLK system an established national framework for timber legality and licensing.
- **Thailand:** Rubber Authority manages farmer registration and traceability.
- **Colombia:** National Coffee Federation maintains a comprehensive farm registry.
- **Ethiopia:** Strong coffee sector institutions support coordinated responses.

In more fragmented sectors such as **Cameroon** (cocoa) and **Lao PDR** (coffee), responses rely primarily on individual companies, pilot projects or development partner funded initiatives.

5. Private sector engagement is emerging, with variation across sectors and contexts

Private sector engagement related to EUDR is progressing across countries and sectors, though at differing speeds and with varying levels of intensity. Drawing on observations from the case studies, a range of potential factors appear to be associated with differences in the scale and form of activity, including company size, degree of vertical integration, exposure to EU and other regulated markets, and the availability of national systems or external technical support.

- Significant activity has been observed among larger and vertically integrated companies, particularly those with established commercial relationships in the EU market. These actors have taken internal steps to generate EUDR-relevant information, including the development or enhancement of internal traceability, geolocation, and data management systems.
- Some companies in the selected case studies have explored or engaged third-party service providers to support preparedness activities, such as geospatial analysis, risk assessment, data verification and certification support.
- Private sector actors have been bolstering sector capacity and participated on a voluntary basis in pilot or testing activities, reflecting parallel public and private system development and alignment potentials.
 - **Indonesian** timber exporters are preparing to report through the SVLK+ system, aligning internal and national legality assurance mechanisms with EUDR-related requirements.
- Private sector-led activity has remained individual, except where strong associations exist.
 - In **Colombia's** coffee sector, the National Coffee Federation has coordinated sector-level efforts, including adjustments to existing tools and expansion of geolocation and traceability coverage to support EUDR-related requirements.
- While some preparedness efforts are addressing all markets, others have focused on specific products or market segments.

- **Thailand** (rubber), **Indonesia** (wood) are piloting segregated models limited to EU-bound trade volumes.

6. Smallholder inclusion remains an ongoing consideration

Across countries, smallholder inclusion is widely recognised as an important consideration for EUDR implementation. Ongoing efforts have largely focused on upstream segments of supply chains, including farmer registration, trader formalisation, and capacity support for smallholders. While potential risks of exclusion have been noted in several contexts, these remain localised. The current emphasis on upstream data collection and farm-level visibility provides a practical entry point for identifying and, where relevant, scaling inclusive support in line with national commitments.

- Examples of actions underway include:
 - GPS-based farm mapping initiatives in **Cameroon, Lao PDR, and Thailand**. In **Ghana**, a national farm registry has been established, and cocoa origin information is expected to be made available to buyers for EUDR due diligence. In **Thailand**, about 1.98 million of an estimated 2.2 million registered rubber plots have been mapped.
 - Mandatory certification of fresh fruit bunch dealers in **Malaysia**'s palm oil sector has been introduced through a revised national certification standard.
 - Capacity-building activities for cooperatives, small and medium-sized enterprises and mills took place, supported through EU and bilateral programmes.
 - Development of traceability tools intended to support smallholder inclusion, led by government and private sector actors.
- Early indications of potential challenges include:
 - In **Malaysia**, independent mills sourcing predominantly from individual smallholders have reportedly experienced greater difficulty in preparing for the EU market, though these account for a limited share of EU-bound exports.

Role of development partners

Development partners, including the EU and its member states, have supported EUDR-related activities through financing and technical assistance. This includes among others the Team Europe Initiative on Deforestation-free Value Chains, a joint initiative by the EU and its Member States to promote sustainable value chains for

smallholders and low-income countries, and its flagship projects such as the SAFE Programme, Sustainable Cocoa Initiative, Technical Facility, and AL-Invest Verde. This is complemented by other country-specific bi-lateral and multilateral programmes and projects. While not necessarily labelled as EUDR preparedness support and typically designed with broader sustainability objectives, this financial and technical assistance, nevertheless, is often supporting activities that help countries prepare for the EUDR through promoting tools and approaches that improve the sustainability of value chains.

Across countries, progress has been most pronounced where this support has aligned with existing national strategies, institutional arrangements, and sector systems, and where sector-level coordination mechanisms are in place. Support provided has included:

- Awareness raising activities across sectors.
- Legality and regulatory gap assessments.
- Traceability and GPS mapping pilots.
- Production of 2020 forest maps and exchanges on mapping.
- Development of deforestation risk assessment tools.
- Shipment testing exercises involving the EU Competent Authorities.
- Capacity-building activities for smallholders, SMEs, cooperatives, and government agencies.

Role of civil society organisations

Civil society organisations (CSOs) have participated in policy dialogues and technical exchanges related to EUDR across most case studies. In several cases, CSO engagement has been channelled through established structures and platforms, such as the **Ghana** Civil Society Cocoa Platform, which has served as a forum for discussion on EUDR-related issues and some engagement with COCOBOD. In a few contexts, CSOs have contributed as intermediaries between producers, downstream actors, and public authorities, particularly in smallholder-dominated sectors and supply chains characterised by fragmented actors and information flows.

Levels and forms of engagement vary by country and sector. To date, EUDR-related processes have not consistently generated the same scale or focus of civil society mobilisation as earlier initiatives centred on legality or governance reform. Examples of CSOs participation include:

- Consultations related to the **Indonesia's** SVLK+
- Coffee sector dialogue platforms in **Ethiopia**

- **Cameroon's** Sustainable Cocoa Committee

Considerations for future action from the case studies

The following considerations emerge from reflection on the case studies, observed actions taken by sector actors, and potential areas for further attention as the date of EUDR implementation approaches. They should not be interpreted as generalisable findings or recommendations applicable across all producer countries or sectors. Rather, they are intended to support reflection and dialogue, including to help where further support, coordination, or policy alignment may be most beneficial for advancing sustainability goals.

For EU institutions

Early responses observed across the eight producer countries analysed suggest that the EUDR may contribute to supply-chain transparency and sector-level coordination on sustainability goals in national contexts. To support this potential, EU institutions could consider a constructive enabling role through the following approaches:

- Providing operational clarity and guidance on how national traceability, legality, and forest data systems may be used within EUDR due diligence. Such guidance can help reduce uncertainty for operators and support confidence in producer-country systems that are in the process of alignment with EUDR information requirements.
- Exploring ways to reflect demonstrated progress in producer countries, including through assessments and communication.
- Continuing to combine technical compliance support with targeted assistance for legality reform and smallholder inclusion, recognising that deforestation-free supply chains are shaped not only by data and traceability systems, but also by land tenure security, labour protections, and producer capacity.

For producer-countries

The EUDR may present opportunities to build on existing sustainability and governance efforts in producer countries. In this context, producer-countries may consider the following approaches:

- Embedding EUDR-related preparedness within broader national governance, legality, and sustainability frameworks, so that investments in traceability and data systems contribute to longer-term institutional development and continued access to regulated markets.
- Enhancing coordination and clarifying mandates in liberalised or fragmented sectors, where current governance structures may limit sector-wide coverage.

Greater coordination may support consistency, reduce duplication, lower compliance costs for producers, and help address challenges faced by smallholders.

- Exploring timely, incentive-based approaches to encourage legal and deforestation-free production, particularly for smallholders and small and medium-sized enterprises. Such approaches may complement regulatory compliance by supporting wider uptake and reducing the risk of exclusion.
- Facilitating cooperation among producer countries through structured exchange of lessons learnt, technical experience, and good practices related to EUDR and regulatory market preparedness, including traceability systems, smallholder inclusion, and enforcement approaches. Such cooperation may help reduce preparedness gaps, promote peer learning, and strengthen collective capacity to respond to evolving regulatory requirements.

For private sector

As the EUDR places legal obligations on economic operators, private sector actors along the supply chain may consider the following actions to manage compliance risks and strengthen preparedness:

- Investing into supplier capacity for farm registration and mapping, record keeping and traceability, and strengthening long-term supplier relationships in sourcing regions to reduce exclusion risks and supply chain disruptions.
- Coordinating with other actors to promote sector-wide readiness and minimize supply chain risks through collaboration on standards for data collection, mapping initiatives, legality challenges or data infrastructure, in particular when individual company actions are costly or technically complex
- Engaging with producer country governments and EU Competent Authorities in testing exercises (e.g. dry runs) to identify operational challenges and promote alignment between systems, and to channel feedback on operational challenges and legal certainty.

Conclusion

Early evidence suggests that the EUDR is contributing to increased awareness of deforestation and legality risks, institutional mobilisation, multi-stakeholder dialogue, and technical alignment in producer countries, notably by accelerating attention to and use of national systems for sector management and sustainable trade. While implementation challenges remain, particularly in relation to smallholder inclusion, sector fragmentation, and legal reform, these challenges largely reflect underlying

structural constraints rather than a lack of engagement or sector wide commitment. If addressed through a solid partnership approach, proportional implementation, regulative clarity and sustained support and investment, the EUDR, in its current form, may help reinforce ongoing sustainability reforms, strengthen forest and agricultural governance, and support more transparent global commodity supply chains.

Methodological note

This synthesis draws on 1) EFI's country-level expertise accumulated between 2021 – 2025 and captured via questionnaire and interviews, and 2) evidence from events, reports, and development partner projects. Together these sources are used to describe some of the responses observed ahead of EUDR implementation across eight case studies. While these findings provide an initial picture of early responses to demand-side measures, further research is needed to better understand EUDR impacts more broadly, as conditions in other contexts, with different forest cover, sector organisation, regulatory capacities, commodity priorities and levels of support, may result in other responses. Future research should therefore extend to a wider range of cases. The present analysis focuses on contexts where EFI is directly engaged and is consequently biased towards settings with active development partner engagement and higher levels of institutional mobilisation. In addition, deeper within-case analyses would be needed to fully capture the dynamics and distributional effects of observed responses. It is also important to note that attributing impacts solely to the EUDR remains a challenge given the influence of national contexts, pre-existing sustainability initiatives, and broader global trade dynamics. Nevertheless, strengthening the empirical base will help to support informed dialogue with partner governments, the EU, and other stakeholders, and contribute to ensuring that evolving demand side measures deliver meaningful impact.