



EUDR Community of Practice

Public Session

17 September 2026

EU Sustainable
Supply Chains Coalition



EUDR Community of Practice

A joint initiative of the **Sustainable Supply Chains Coalition** and the **European Forest Institute**

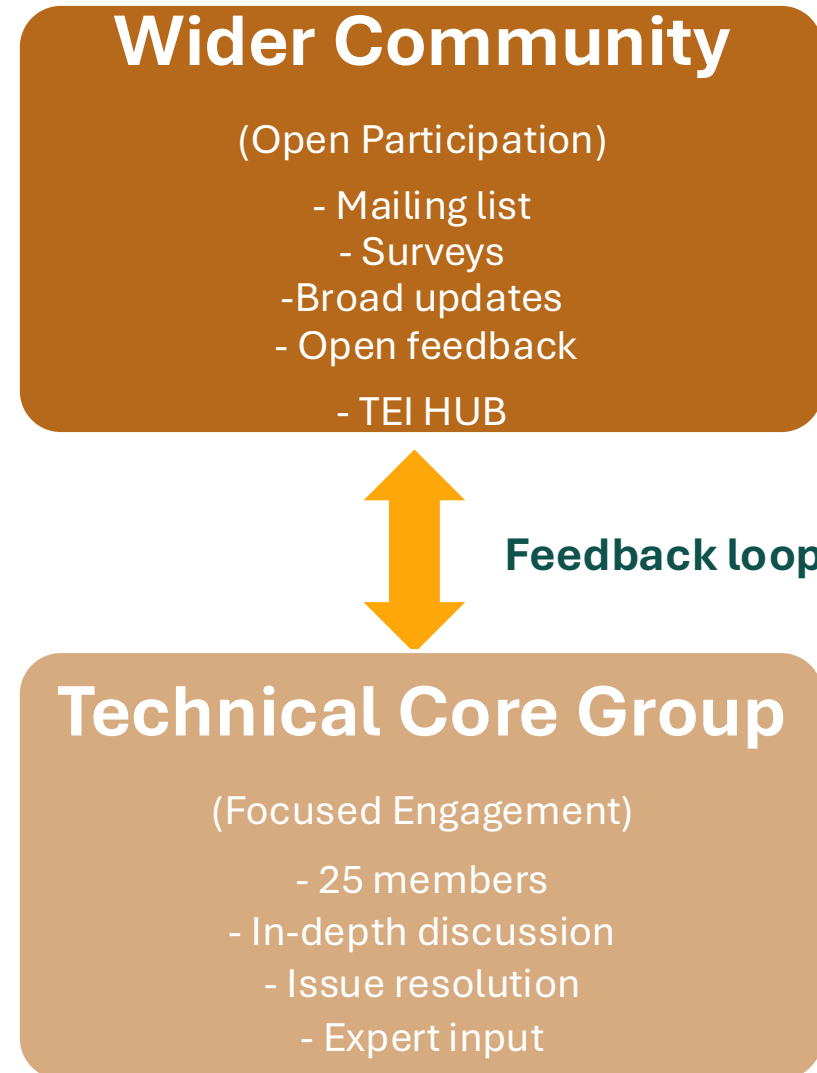
Launched 11 March 2026

~1200 subscribers

EUDR CoP - Objective

To promote **collaborative engagement** between **businesses**, EUDR **Competent Authorities**, **NGOs** and the **European Commission**, focusing on the exchange of practical solutions and the identification and resolution of implementation challenges.

EUDR CoP Structure: wider community + core group



EUDR CoP Core Group

Category (seats)	Organisation
Operators (7)	Sucafina, Ferrero, Bunge, Corrie MacColl Europe bv, Mars, IKEA, AAK
Traders, SMEs, Producers (8)	Walter Matter, Tony's Chocolonely, Marks & Spencer, Tatwin, Nestlé, Danzer, Grupo Garnica Plywood SAU, LIPSA
NGOs (3)	Earthright, EIA, WWF, FERN (rotational) Voice Network
Competent Authorities (11)	Belgium, Czech Republic, Finland, France, Germany, Netherlands, Portugal, Slovenia, Spain, Sweden, Italy
EC (observers)	DG ENV and DG INTPA
Co-facilitators	EFI and Sustainable Supply Chains Coalition

Welcome remarks – Core Group Reps

1

Jennie Sverker

Competent Authority,
Sweden

2

**Anke Schulmeister-
Oldenhove**

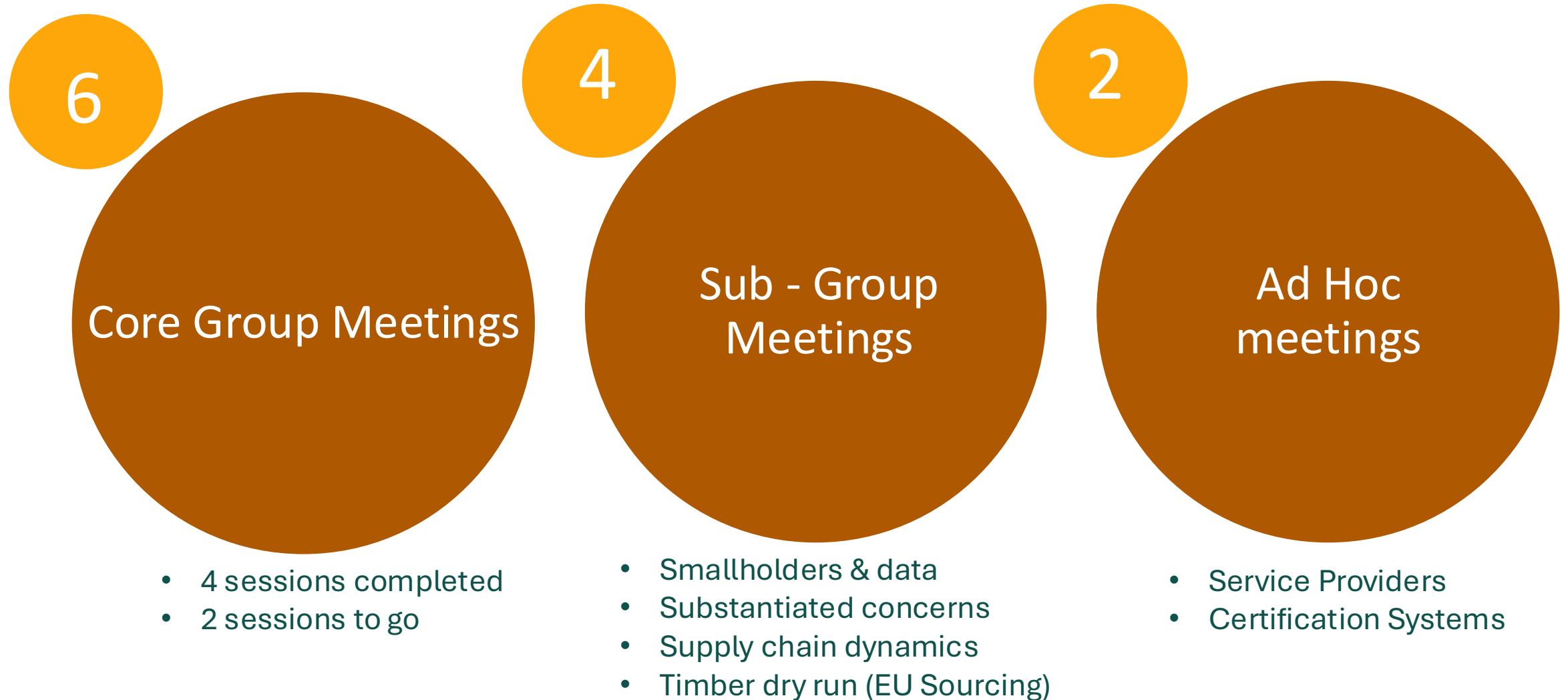
NGO, WWF

3

Karolina Zazvorkova

Observer
European Commission

EUDR CoP Meetings : Core Group + Wider CoP



Engagement with the wider CoP

- Published reports and presentations after each core group session: <https://efi.int/collection/eudr-community-practice>
- Joint interventions in other fora:
 - EU Multi-Stakeholder Platform on Protecting and Restoring the World's Forests
 - Global Palm Oil Community - Community of practice for palm oil producing companies and countries
 - Team Europe Initiative (TEI) Eurotrip – Asia & Pacific (Brussels) - Engagement with representatives from producer countries in Asia and the Pacific
 - Workshop: “EUDR – Triggering Systemic Changes” - CoP presented by Marta Angoloti (Spanish Competent Authority)
 - TEI partners meeting - Participation alongside partners including ITC, FAO, GIZ, IDH
 - International Coffee Organisation (ICO) - TW3 meeting
 - Webinar on Sustainable Palm Oil - Sustainable Development Festival 2026 ASviS
 - Sustainable Palm Oil Dialogue, Chester UK
 - Ethical Trade Denmark and Danish Competent Authority
 - ICO meeting – TW3 Meetings
 - TEI Learning Series on Public-Private Partnerships
- Use of online surveys (2)
- Public sharing session – this meeting!

EUDR Core Group Meetings

Six sessions scheduled in 2026
4 Sessions convened

Core Group sessions and key insights

Session 1 –
31 March 2025

Introductions, technical discussions on key implementation challenges – legality stood out, application of risk-based DD

Session 2 –
12 May 2026

European Commission simplification package and implication on downstream DD

Session 3 –
29 June 2026*

Legality case studies, and sub-group meeting on EUDR supply chain scenarios, substantiated concerns and timber dry runs

Session 4 –
8 September

Reporting from subgroups, session with Traces and discussion on an 'EUDR emergency pack'

*in person meeting

3rd Core Group Session – in person



Ad Hoc Meetings

Ad Hoc Meeting – Service Providers (16 June)

Service providers tend to reduce burden and act as ‘partners’ in EUDR readiness

- **Core Group** - Balancing intellectual property vs transparency
- **Core Group** - Smallholders' risk-averse approach points for better alignment with interpretations and more consistent updates on EUDR changes
- **Service Providers** - Enhancing interoperability and alignment across systems – particularly for SMEs (midchain)– dealing with many different systems
- **Service Providers** - Service Providers have to navigate legal uncertainty of EUDR, and keep up with EUDR updates
- **Service Providers** - Develop guidance on how to report / document results, evidence, risk-based approach, how to present data / info

Ad Hoc Meeting – Certification Systems (15 July)

**Legality Survey: certification widely used to support legality DD;
EUDR dry runs confirms value of certification but also its limits.**

- Dutch CA shared insights from the dry runs and NVWA's assessment and use of approved schemes to support supervision
- **Certification systems** – evidentiary value of audit reports + latest guidance on legality information collection
- **Certification Systems** – strengthen harmonisation between Competent Authorities is key
- **Core Group** - Certificate validity ≠ EUDR compliance (non-compliance may be tolerated during audit not EUDR)
- **Core group** - Risk-averse approaches and traceability gaps highlight the need for continued attention to smallholder inclusion

4 Legality Case Studies

Palm Oil / Rubber

Case Study 2: Palm Oil,
Malaysia (Sabah)

Use of national
certification

Soy / Beef

Case Study 4: Beef and soy,
Paraguay

Private certification
and national
registries

Cocoa / Coffee

Case Study 1: Cocoa, Côte
d'Ivoire

Smallholder land
tenure

Timber

Case Study 3: Timber,
Romania

Environmental
legality

Case Study 2: Palm Oil

Malaysia (Sabah)

Case Setting



Operator (Malaysia sourcing)

-> Relies on MSPO certification as legality compliance tool

Sabah Supply Chain



Smallholders



Intermediaries



Mills

Traceability risks • Weak **first mile traceability** due to use of intermediaries, risk of mixing

Legality risks:

- **NCR land claims:** indigenous customar claims,
- **Migrant labour issues:** recruitment fees, passport retention, low wages, poor living conditions

Key legality issues in play

- **Land tenure & NCR:** Different tenure arrangements exist. NCR may be legally recognised without formal title; boundaries and competing claims may require additional evidence.
- **New planting requirements**
 - No conversion of natural forests, protected or HCV after 31 Dec 2019.
 - HCV assessment required before new planting.
 - Environmental and social impacts must be assessed.
 - Restrictions on planting in sensitive areas (e.g. peat, steep slopes, riparian areas).
- **Deforestation:** Legal deforestation permitted in some cases
- **Third-party rights:** NCR, competing land claims & indigenous community rights should be considered; FPIC and grievance records may support due diligence.
- **Labour:** Key risks include forced labour and child labour

Key challenges and identified good practices (extracts)

	Key Challenges	Good Practices Identified
1	Preliminary risk assessment and the role of mandatory certification MSPO's mandatory status and Malaysian Palm Oil Board (MPOB) licensing link don't settle EUDR legality DD needs	• First understand applicable national legislation then complement with information from certification • Certification can help differentiate where further investigation is required - rather than repeating all checks
2	MSPO transition to 2022 standard MSPO definition of forest not fully aligned with the EUDR definition Dealer Certification new and coverage low	• transition to MSPO 2022 significantly increases the usefulness of MSPO for EUDR due diligence, particularly the deforestation cut-off and dealer certification, and strengthen first-mile chain of custody traceability, and labour/human-rights requirements
3	Legality: Understanding applicable laws and scope of legality • Uncertainty about how labour and human rights should be considered under EUDR legality • Concern that Competent Authorities may interpret these requirements differently	• Mandatory certification helps clarify the laws applicable to production in Malaysia • Assess key labour and human-rights risks and focus checks were salient issues identified • Provide grievance mechanisms for concerns to be raised.

	Key Challenges	Good Practices
4	Land tenure, NCR claims and third parties' rights - No individual title for communal land - NCR claims can stay unresolved for years - Risk of smallholder exclusion due to lack of verifiable information	- Don't equate land use rights with land ownership; - Verify community membership/ rights for communal titles then link individual plots to the communal titles - Check for competing claims not just land use rights - Use harvesting permits used as 'land use right' evidence
5	Environmental compliance & deforestation - differences in definitions & certification rules - EUDR-specific spatial check needed - Risk of mixing in the PO sector because segregation not possible downstream	- DD system should assess legality under Malaysian law and deforestation under the EUDR separately - Mitigations measures critical to demonstrate negligible risk of mixing
6	Traceability, mixing and segregation - Intermediaries weaken smallholder visibility - Continuous harvest (e.g. rubber) and processing (PO) adds complexity; - Mass Balance complicates plot-specific traceability.	- Describe complex supply chains with intermediaries and how first mile traceability can be achieved - Reconcile farmer-collector-factory flows via chain-of-custody controls; - Use monthly (not annual) plausibility checks to find errors - Document segregation arrangements per shipment;

Conclusion: Certification can provide a strong foundation for EUDR due diligence, but does not replace the operator's own assessment. Operators can use existing systems, while identifying and addressing EUDR-specific gaps. Mandatory certification is especially useful for clarifying laws applicable to area of production.

Case study 4: beef and soy

Paraguay

European Food Company: sources beef from a Paraguayan frigorífico aggregating cattle from the Gran Chaco and eastern region + soy from with cross-border crushing facilities with Argentina

No Direct Contract: The company has no direct contractual relationship with any ranch or soy farm.

Environmental Pressure: The Gran Chaco lost 3.5 million hectares of forest between 2001 and 2020, primarily driven by cattle ranching.

Key challenges and identified good practices (extracts)

	Key challenges	Insights and good practices
1	International trade frameworks and contextual governance indicators: • Relevance of the EU-Mercosur Trade Agreement? Art. 55/Annex 18A refers to mutual recognition & dialogue regarding certification and traceability • WBGI on Rule of Law & Control of Corruption < the world average for Paraguay.	• International trade agreements = general bilateral cooperation frameworks. Do not grant a 'green lane' or alter the direct EUDR legal obligations. • Use governance indicators (eg WBGI, CPI) as contextual risk inputs to evaluate the reliability of official documentation and government oversight.
2	Traceability system integrity: • SENACSA official movement permits, but system vulnerabilities—eg identifier tag re-use, paperwork falsification, unregistered movements. • Soy: grain aggregated at local silos and regional crushing facilities→ complex cross-border chain-of-custody tracking hurdles.	• Treat SENACSA info as one input + evaluate the systemic credibility and integrity of the tracking system. • Apply layered traceability checks including periodic third-party spot-checks at assembly points. • Soy: leverage sector-wide monitoring platforms that integrate deforestation screening with traceability + understand the underlying methodology.

Key challenges and identified good practices (extracts)

	Key challenges	Insights and good practices
3	Indigenous land rights & FPIC: • A rancher may hold a valid administrative title while operating on land subject to customary territorial rights recognised under the Constitution. • Invisibility of social land disputes: collecting formal titles and permits, missing ongoing land conflicts.	• Recognise that under domestic & international law, indigenous rights exist independently of administrative demarcation. • Check specialized databases (e.g., Mapbiomas), NGO reports (+ contact report's author when necessary) and court case reports. • Operational grievance mechanisms
4	False positive alerts: • Geospatial satellite screening frequently generates 'false positives'—flagging natural vegetation clearing, fire events... as deforestation.	• Establish protocols for analyzing & filtering false positives. • Compile evidence (eg., high-resolution imagery, official permit records, ground verification) used to clear a flagged alert. • Obtain service provider to disclose false-positive treatment methodology + map source data so the operator can defend its conclusions to Competent Authorities.

The 'presumption of innocence' principal vs EUDR

- Situation: EUDR commodity suppliers that local enforcement agencies have formally accused of serious offences, but still hold valid certificates (from voluntary certification schemes) until legal processes are exhausted and final confirmation of guilt proven (example in Brazil)

Challenge	Insights and good practices
• This creates a dilemma when certification schemes allow suppliers to retain valid certificates despite officials having exposed serious wrongdoing • Certs remain 'valid' until all avenues for appeal are exhausted • The illegality findings will not even create a 'non-compliance', though they may nevertheless get mentioned in audit reports • Sometimes auditors don't even notice	• Formal accusations by government agencies against a company = 'non-negligible risks' even if all legal processes have yet to be completed • Operators cannot assume that a valid cert from a voluntary cert scheme which takes this approach (all of them at present) guarantees EUDR compliance • Further work by the operator expected to ensure negligible risk • Operators must analyse cert scheme audit reports for examples of this for all their suppliers • Operators should also check that cert scheme auditors are required to seek evidence of such cases (eg in judicial databases); or if not, do so themselves

Q&A

Palm oil / rubber and soy / beef case studies

Case study 3: Timber

Romania

Case Setting



Company A

Large Romanian Producer
(beech + oak)
-> Privately owned forests



Company B

Romanian
company that
processes logs
into plywood



Company C

Large
downstream
customer



- Romania is one of the EU's largest producers and holds significant primary beech forests
- Cases of large-scale illegal logging and failures in country's forest governance

Discussion points:

- **Company A's obligations** as primary operator
- **Downstream reliance** on Company A's DDS
- **Simplified DD** for micro/small forest owners and logging companies
- **Handling substantiated concerns**

Key challenges and identified good practices (extracts)

	Key Challenges	Good Practices
1	Low-risk classification ≠ full governance picture; other frameworks flag risks independently	• Treat benchmark as one input; • Separate procedural vs. legality/deforestation risk assessments • Apply consistent cross-market screening
2	"Simplified" ≠ "none" MSPO status and update frequency remain ambiguous	• Document legality evidence • Support small operators via representatives • Track changes to update declarations • Seek collective clarification
3	Complex ownership/harvesting-rights models obscure who is "placing on the market."	• Map ownership/harvesting-rights structures • Assess by-products separately • Document the reasoning behind operator determinations

Key challenges and identified good practices (extracts)

	Key Challenges	Good Practices
4	Blending risks , tracking confirms movement, not legality; limited downstream access	• Treat national tracking systems as a partial tool • Continue developing sampling/lab techniques to cross-check origin claims
5	Legality extends beyond deforestation to protected areas, permits, habitat rule; satellite tools useful but limited.	• Build a separate environmental-legality • Cross-check with independent sources • Document remote-sensing limitations
6	Downstream actors: • only get a reference number, not full supply-chain detail, • face unsettled investigation expectation, • operate under distinction between public info and substantiated concern	• Retain upstream due diligence references and supplier identities, • Apply risk-based verification prioritizing higher-risk suppliers, • Engage directly with suppliers when concerns are confirmed, • Use contractual requests

Highlights

- Simplified DDS, country benchmarks, and tracking-system registration are all starting points, **not substitutes for judgement or proof of legality**
- Evidence obligations, actual legality, and lawful harvest verification require **independent scrutiny beyond procedural compliance**, and since due diligence obligations vary structurally across the supply chain

-> effective implementation depends less on data volume and more on how well information is verified, shared, and acted upon

Case study 1: Coffee and Cocoa

Côte d'Ivoire

Case Setting



Cooperatives

Company A

Sources from smallholders from western forested and centre-west zone in Côte d'Ivoire where **boundary between farmland and classified forests is contested**

Company B



Large Manufacturer
Sells finished chocolate products



Process and sell
cocoa mass

+ DDS reference
nbr



Topics covered:

- Customary land tenure and land conflicts
- Agricultural frontier and classified forests
- Child labour
- Agrochemicals
- Reliance on country tools
- Downstream operators and substantiated concerns
- Reconciling product prohibition with a risk-based due diligence approach

Key challenges and good practices: land tenure

	Key Challenges	Good Practices
1	Most smallholders hold land under customary arrangements, no formal title, hundreds of thousands of farmers	• Rely on combination of evidence – land registers, official and non-official sources, satellite data can support information on plot boundaries
2	Land disputes may occur (varies by country), grievance mechanisms frequently managed locally, not visible to operator	• Treat land-related grievances as early-warning signals for wider due diligence review, not as isolated administrative matters • Engage a broad set of local stakeholders – village councils, cooperatives, community representatives, etc. – when verifying land tenure
3	Fact-finding missions or field verification resource-intensive and slow	• Establish escalation triggers – use field trips only for specific grievance, NGO report, or other credible signal

Key challenges and good practices: agricultural frontier

	Key Challenges	Good Practices
4	Forest maps (if they exist) may be outdated or incomplete, or not clear on legal boundaries or classifications – encroachment common	• Overlay geolocation data against recognised protected-area datasets, but avoid excluding suppliers automatically on the basis of overlap alone – may still be legal • Situation is changing fast: some governments working to publish clearer information on forest and farm boundaries
5	Highly fragmented supply chains make it easy for non-compliant cocoa to enter supply	• Where overlap detected, engage directly with supplier • Exclusion of smallholders should be last recourse, only for cases that cannot be adequately substantiated • Put exclusion commitments in writing, link to contracts, while recognising this is a risk-reduction measure rather than an absolute guarantee • Competent Authorities underlined that operators should demonstrate proportionate, good-faith efforts

Q&A

Timber and coffee / cocoa case studies

Sub - Group Meetings

Subgroup topics and presenters

**Smallholders
and data**

Sebastien Garnier, Tony's Chocolonely

**Supply chains
dynamics**

Dominic Le Mare, M&S

**Substantiated
concerns**

Duncan Brack, Co-facilitator

**Subgroups 4
and 5**

Timber dry run and TRACES tests
Forthcoming reports

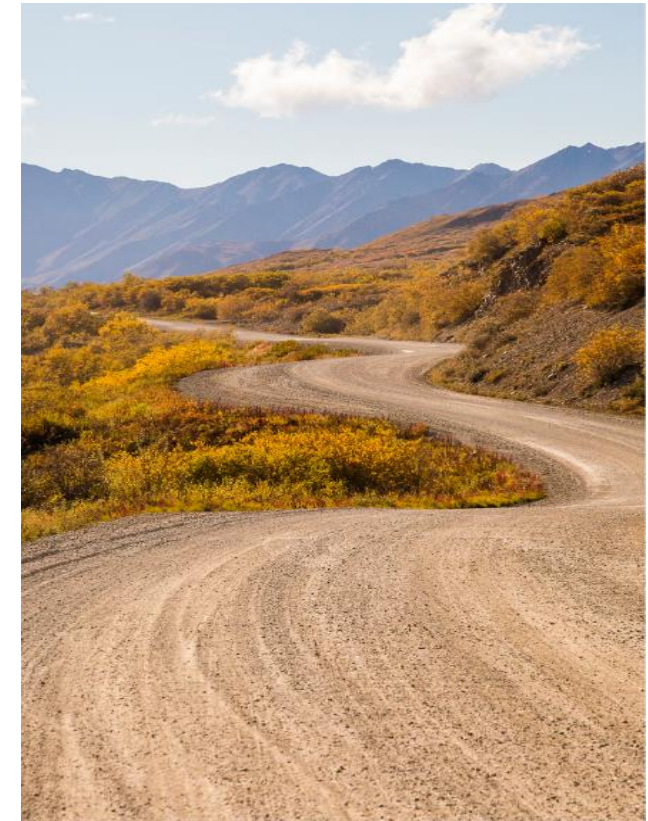
Sub-group objectives and working method

Address a set of urgent and under-examined questions at the intersection of EUDR implementation, smallholders and data issues.

During the first 3 (out of 4) meetings, the sub-group has:

- **Mapped and refined the landscape of concerns**
- **Identified and assessed existing solutions**
- **Developed practical (draft) recommendations**

Deliverable: a report with final recommendations and best practice (forthcoming)



Smallholders & Data sub-group participants

- 8 Companies subject to the EUDR
- 2 Data Companies
- 4 Certification organisations
- 7 Smallholder representatives, NGOs, CSOs & MSIs
- Facilitation: Tony's Chocolonely and the EUDR Community of Practice co-facilitator with support from IDH
- Scope of EUDR commodities represented: cocoa, coffee, palm oil, timber, natural rubber, soy and beef

Meetings under the Chatham House rule



Identified & prioritised categories of issues

**Smallholders'
risks of market
exclusion**

**The cost
burden of data
collection and
ongoing
maintenance**

**Smallholders'
access to their
own data,
ownership and
the right to
correction**



Next steps and deliverables

- 1) Final Sub-group meeting on 9 October :
 - Identify and select **priority solutions and recommendations** for the final report
 - Discuss **how solutions could be implemented** and who could support the solutions development
 - Identifying **possible next steps for this sub-group**
- 2) Finalise and share **Sub-group report with recommendations** to feed into the EUDR CoP Core group
- 3) **Disseminate the CoP report on Smallholders & Data** (EUDR CoP mailing list, blog post, social media)
- 4) **Continuation** of practical joint work (?)

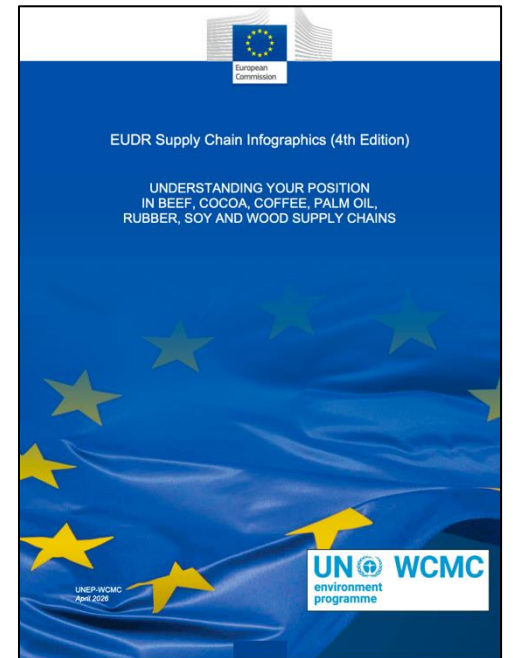
Subgroup 2

Supply Chains Dynamics and Scenarios

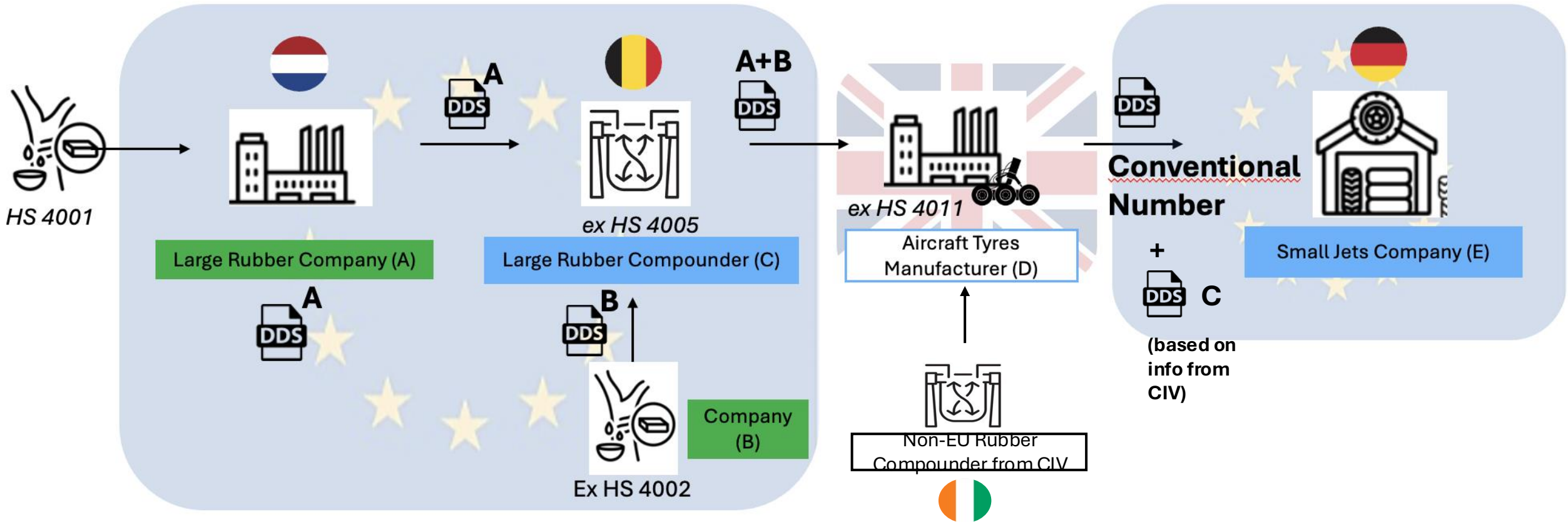
Purpose: seek more clarity on some real-world situations for which members of the EUDR CoP core group remained unsure about how to interpret their roles and obligations under the EUDR.

“Our most important scenarios are not reflected in the the EUDR Supply Chain Infographics”

1. EU re-import scenarios after processing in a non-EU country
2. Dynamics potentially increasing and decreasing DDS market coverage
3. EU subsidiary acting on behalf of a non-EU owner
4. Inspected entities in scenarios involving non-EU operators

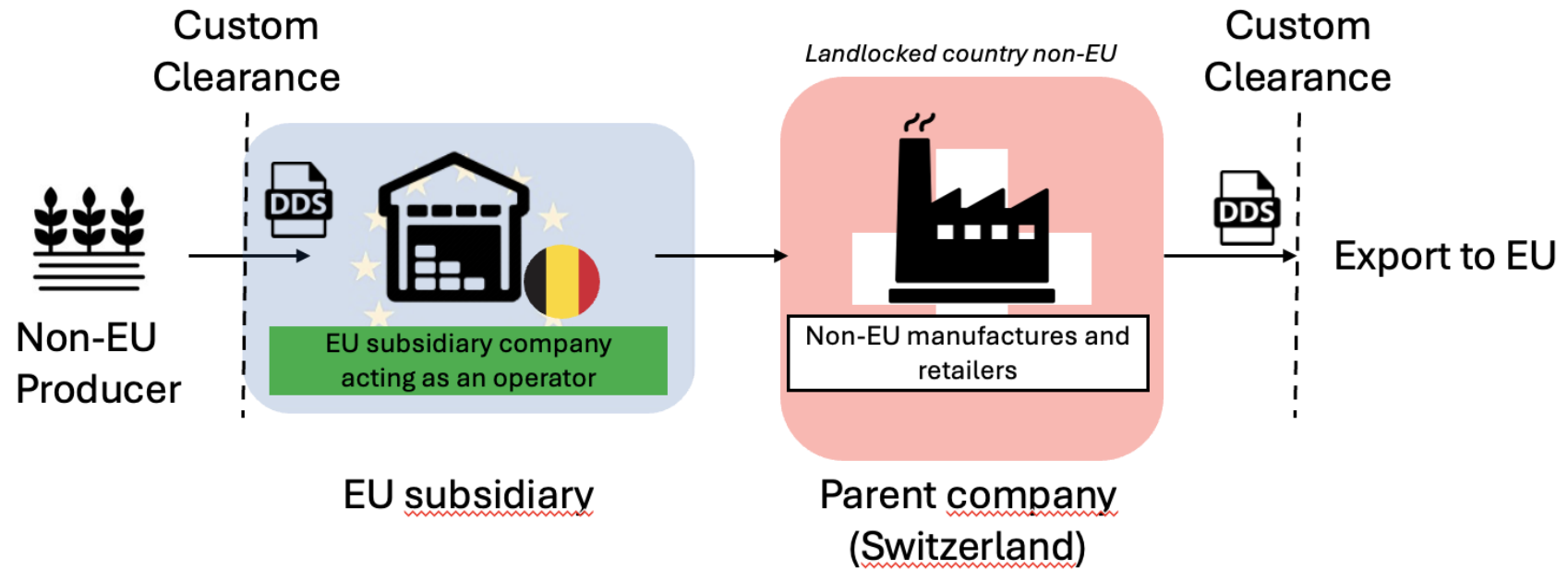


Example 1. EU re-import after processing in a non-EU country



- Given that the tyres are made of products *entirely* covered by a DDS in previous stages before being exported from the EU, company E is a downstream operator and uses the EC conventional reference number.
- No need for the geolocation information, but evidence of previous export from the EU. *What evidence type? e.g., export declaration; DDS A and DDS B reference numbers...?*
- For re-imports, traceability is required up to the point where it was exported for the EU ($\neq$ production point).
- However, if the tyres were made of products only *partially* covered by a DDS, then E would be considered an upstream operator and would need to submit a new DDS covering the Côte d'Ivoire origin.

Example 2. EU subsidiary acting on behalf of a non-EU owner



- Guidance: "For relevant products imported into the EU, the definition of 'operator' is independent of the change of ownership of the product and of other contractual arrangements." (*who clears customs is what matters*)
- FAQ 5.3: "The internal organisation of a group of companies (a mother company and its subsidiaries) is not governed by the Regulation."
- *Can an EU subsidiary act as the operator while ownership and all commercial activities remain with the non-EU parent? Any conditions (capacity, contractual relationships...)?*
- *Could this be considered a form of circumvention? If subsidiary with little or no turnover... does this create a risk that sanctions are not proportionate to the scale of the business?*
- *To what extent can the subsidiary rely on the parent company DD system?*

Subgroup 3: Substantiated Concerns

Challenges

- How specific must information be to qualify as a “substantiated concern” versus “other/relevant information”?
- Timeline for NCA responses to substantiated concerns, including requirements on operators.
- What constitutes “such high risk of non-compliance” as to justify Article 17 immediate action?
- Where a downstream actor cannot obtain information that due diligence has been carried out, does informing the NCA fully discharge the Article 5.6 obligation? Or must the company also refrain from selling the products?

Potential good practices

- Treating press/NGO reports and other informal “relevant information” as valuable input, even when it does not meet the substantiated-concern threshold.
- Running due diligence checks the moment a company becomes aware of a concern (rather than waiting for a NCA contact).
- Operators maintaining contractual provisions with suppliers that anticipate how a substantiated concern mid-shipment will be handled, rather than leaving this to be worked out ad hoc.
- NCAs distinguishing genuine engagement and improvement with a struggling supplier from mere box-ticking, in line with the EUDR’s broader aim of encouraging suppliers toward more sustainable practices rather than simple exclusion.

Q&A

Subgroups

EUDR CoP resources

Summaries of all core group discussions, sub-group meetings, and ad-hoc meetings, and presentations are publicly accessible [here](#)



EUDR Community of Practice

As implementation of the EU Regulation on Deforestation-Free Products (EUDR) moves into an operational phase, stakeholders across global value chains are addressing practical challenges related to compliance and implementation.

The EUDR Community of Practice (CoP) is a neutral, technical forum established as a publicprivate partnership by the [EU Sustainable Supply Chains Coalition](#) and the European Forest Institute (EFI). It brings together businesses, EU Member State Competent Authorities, civil society, technical experts and the European Commission to exchange practical experience, identify implementation challenges and explore operational solutions. EFI provides secretariat support in close collaboration with the Coalition and the [Team Europe Initiative on Deforestation-free Value Chains](#).



Knowledge

Launch of the EUDR CoP – 11 March 2026	✓
First session of the EUDR CoP Core Group – 31 March 2026	✓
Second session of the EUDR CoP Core Group – 12 May 2026	✓
Third session of the EUDR CoP Core Group – 29 June 2026	✓

<https://efi.int/partnerships/EUDRCoP>

Next Steps

- Upcoming Core group meetings reports
- Reports from the subgroups
- Traceability challenges
- Ad hoc meetings with national systems
- 'Emergency pack'
- Dry runs



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Thank you!