



Final report, 14 October 2026

Sub-group on Smallholders and Data Ownership, Verification and Sharing

Final Report: Recommendations and Best Practices

This final report draws on the work of the sub-group's participants during its four meetings held between June and October 2026, together with all written case submissions, survey responses and email input shared by participants around and after these meetings. Discussions within the sub-group were held under the Chatham House rule: this report reflects what was raised and shared without attributing specific statements, cases or figures to individual organisations.

This report was prepared by the sub-group facilitators; it was not reviewed nor validated by members of the EUDR Community of Practice (CoP) core group. As such, its content does not necessarily reflect the views of any particular core group member.

Executive summary

The EU Deforestation Regulation (EUDR) has triggered a rapid, largely uncoordinated expansion of smallholder data collection across producing countries. This sub-group, facilitated by Tony's Choclonely as a EUDR core group member and IDH, with the participation of interested organisations beyond the core group, was set up to facilitate in-depth discussions on the topics of Smallholders and Data Ownership, Verification and Sharing, with the aim of generating practical recommendations and uncovering potential solutions for consideration by the Core Group and the wider EUDR Community of Practice.

The sub-group's discussion converged on three connected challenges: the risk of market exclusion, the cost burden of data collection and ongoing maintenance, and the state of smallholder access to, ownership of, and the right to correction of their data. A recurring theme across all three is the tension between the EUDR's requirement to prohibit non-compliant products from being placed on the EU market, the scope for corrective action, and operators' risk mitigation obligations. Several participants reported that, in practice, uncertainty about data points and imagery, the lack of ground-truthing, and questions over how competent authorities will assess risk mitigation push operators toward automatic exclusion of plots rather than supporting farmers to remediate.

Members shared a wide range of solutions already in development or in use, from pre-screening and ground-truthing protocols to farmer-controlled data tools, tiered data-sharing models, and sector dialogue platforms. Section 4 sets out eight recommendations distilled from this input. Several of the original ten recommendations discussed during the sub-group's process have been merged, and all have been reordered, to reflect both the strategic importance and impact that participants assigned to each at the sub-group's final meeting on 9 October 2026, and their assessment of how readily each can be achieved in practice. Each recommendation is addressed to the actor(s) best placed to take it forward: government, private sector, civil society, or a combination.

1. Introduction and context

The EUDR imposes extensive data collection obligations on operators placing relevant commodities on the EU market. Under Article 9, operators must collect and retain, for at least five years, the geolocation coordinates of

every plot of production, the date or time range of production, evidence of legal harvest, and identifying information for every supplier. Operators are responsible for verifying this information and may need to support smallholder suppliers in generating, collecting and sharing it as part of their risk mitigation measures under Articles 10 and 11.

This has driven a rapid, largely uncoordinated build-out of farmer databases, mapping tools and traceability systems by individual operators, trader coalitions, technology providers and producing-country governments. Because these systems have developed in silos, without shared standards or smallholder-centred design, several questions about the fairness, efficiency and effectiveness of EUDR implementation have emerged from the sub-group's exchanges.

A theme that has run through the sub-group's discussion, and which frames much of Section 4, is the tension between Article 3 of the EUDR, which excludes non-compliant products from the market; Article 24, which provides for proportionate corrective action to bring non-compliance to an end within a reasonable period; and Article 11, requiring risk mitigation measures from operators.

The EUDR recognises that particular attention needs to be paid to indigenous peoples, local communities and smallholder groups as part of current and new partnerships and cooperation mechanisms enabling the transition to agricultural production that facilitates compliance (Article 30 EUDR). However, the first review of the EUDR's impact, including on farmers, in particular smallholders, Indigenous Peoples and local communities, and of the possible need for additional support for smallholders to meet the requirements of the EUDR is now only foreseen for 30 June 2030.

This sub-group's evidence, and its recommendations, provide specific input for guidance and support measures which companies, Member States and the European Commission may consider, to specifically address the exclusion of smallholders due to data collection, verification and sharing issues.

2. Scope, method and evidence base

The sub-group brought together companies subject to the EUDR, data and assurance providers, certification organisations, and smallholder representatives, NGOs and multi-stakeholder initiatives, and was co-facilitated by IDH and Tony's Chocolonely, with participation from the EUDR Community of Practice secretariat.

This report draws on discussion and summary notes from the sub-group's four meetings, together with written case submissions, existing research and tools, survey responses, and email input shared by participants around and after these meetings. The first two meetings focused on mapping and evidencing the challenges; the third meeting shifted the discussion to a wide-ranging brainstorm of solutions; and the fourth and final meeting, held on 9 October 2026, focused on the practical next steps for each recommendation and their prioritisation.

Discussion was weighted toward smallholder-specific concerns in cocoa, coffee and palm oil. Input was also provided from soy and beef sector dialogue platforms in South America. Rubber and timber remain under-represented in the evidence base.

3. Identified challenges

The sub-group organised members' concerns into three main challenges identified in the initial stages of its work. These three challenges are not independent of one another, and several of the solutions in Section 4 respond to more than one at once, but they provide a useful structure for describing the evidence gathered.

3.1 Risk of market exclusion

This challenge has two connected dimensions. The first is structural exclusion: a pattern, rather than a deliberate policy, in which operators lean toward excluding a smallholder whenever a compliance risk cannot be

immediately and conclusively discarded or resolved. Participants linked this directly to the tension between Articles 3, 10, 11 and 24 of the EUDR described in Section 1: the possible consequence of getting a risk assessment wrong is exclusion of products from the EU market, and because it is not yet clear how competent authorities will assess a given risk mitigation approach (which is context-specific), operators and their suppliers may take the more conservative, often less costly, option of excluding plots and/or smallholders. Participants noted a similar chicken-and-egg problem on the competent authority side: authorities find it difficult to indicate in advance how they would assess a given approach, but few test cases will come forward for them to assess as long as operators fear that a less conservative approach will be judged insufficient. Cautions were also raised that an implicit expectation of having overly perfect, complete information on every farmer and plot can itself become a driver of exclusion, independent of actual deforestation risk.

The second dimension is the risk and occurrence of false positives, and the limits of remote (satellite) sensing on which most screening currently depends. Case evidence shared with the group shows a false positive rate as high as 98% among cocoa farms initially flagged for deforestation in one supply base¹, and, separately, false positive rates as high as 55% (Peru) to 78% (Honduras) in agroforestry-dominated, mostly coffee, regions² using standard geospatial monitoring tools, reflecting the tendency of such tools to misclassify sustainably managed agroforestry as deforested land. By contrast, one company's structured pre-season pre-screening process, which flags a proportion of polygons for further review before the sourcing season begins, was reported to result in a positive (i.e. potentially non-compliant) finding rate of around 0.1% of polygons reviewed.

Participants agreed that field verification remains the only reliable way to confirm or rule out a flagged case, but that this is costly and slow, and is complicated further by inconsistent forest and protected area reference layers, since different actors do not always use the same boundaries or thresholds (for example, the share of polygon overlap between two data sources at which a plot is treated as duplicate or excluded varies significantly across companies). A related, more hopeful reflection was that as remote sensing data quality improves, this can reduce, rather than increase, the workload of ground-truthing and appeals, by making it feasible to focus field visits only on the farms genuinely flagged; participants were nonetheless clear that remote sensing alone should not be expected to ever deliver fully 'perfect' data and will always contain the risk of exclusion.

This leads to the question if relying on remote sensing alone is a sufficient risk assessment measure under Article 10 EUDR to assess for no or only a negligible risk, especially in the agroforestry contexts. On this point, the Commission's EUDR Guidance (July 2026) notes that data collection, risk assessment and risk mitigation must be causally related and reflect the characteristics of the operator's business and supply chains, and that the level of risk can only be assessed case-by-case, depending on a number of factors.

3.2 The cost burden of data collection and ongoing maintenance

Three related cost issues were raised. First, the scale and distribution of data collection and verification costs: a coffee cooperative case shared with the group put registration and verification costs at roughly USD 1.5 per farmer, while separate research pointed to costs to fully comply running in the low hundreds of thousands of US dollars for a mid-sized coffee cooperative, with further research shared by participants confirming that the relative burden of EUDR compliance costs falls roughly three times more heavily on SMEs than on large firms, even though the impact of passing these costs through to consumers would be minimal³.

¹ Tony's Open Chain Impact Report, 2024/25, page 75 <https://online.flippingbook.com/view/176457927/75/>

² Solidaridad, *The Key to Implementing EUDR Without Smallholder Exclusion*, April 2026 <https://www.solidaridadnetwork.org/news/the-key-to-implementing-eudr-without-smallholder-exclusion/>

³ Latin American and Caribbean Network of Fair Trade Small Producers and Workers (CLAC), *Analysis of the Potential Trade Impact of the European Union Regulation on Deforestation-Free Products (EUDR) and the Regulation on Organic Production and Labelling of Organic Products (EU 2018/848) on Fairtrade Small-Scale Coffee and Cocoa Producers in Latin America*, April 2026 <https://fairtrade-advocacy.org/storage/documents/LNu1d7dweiGu0Uq2gpGnhr7Jb49MYN9wEx96IGMN.pdf>

Second, costs arising from duplication and the absence of data interoperability between different data schemes: the same smallholder can be mapped, screened, and asked to provide the same information multiple times by different buyers using non-interoperable platforms, multiplying cost and effort with no corresponding benefit to compliance quality.

Third, a specific cost burden falls on cooperatives or, where cooperatives do not exist (as is common in some coffee origins, where exporters play this role instead), on the exporters and other intermediaries who act as de facto data custodians on behalf of many smallholders at once.

Members also stressed that this is not a one-off cost: because production, land use and risk flags can change from one harvest cycle to the next, data collection and verification has to be substantially repeated at least annually, so any solution needs to be sustainable on a recurring basis rather than solving the problem only once.

3.3 Data access, ownership and the right to correction

Members identified four connected concerns under this challenge. First, data currently flows upward from farmers to buyers but rarely flows back down to the farmer in a usable form, so farmers cannot see or verify what has been collected about them. Second, misclassification of agroforestry and mixed land use systems (see also Section 3.1) means that farmers, in these cases, practising legitimate, sustainable production are disproportionately likely to be flagged and fall victim of false positives, without an accessible way to challenge the finding. Third, questions of data ownership and governance remain unresolved, including who, as between the farmer, the cooperative or exporter, and the buyer, is considered to own, process, control or manage farm-level data, and what data (sharing) rights and obligations parties have towards the farmers or cooperatives who are the original collectors and owners of data(bases). Fourth, and most acute, is the near total absence of correction or appeal mechanisms: where a farmer disagrees with a finding, there is typically no defined route to have it reviewed or corrected.

A further, closely related and increasingly urgent concern is personal data protection, raised in detail during and after the third meeting. Participants described how, as a single flow of product moves through a supply chain, the same farmer's data can end up tested for EUDR compliance by several companies in that chain in parallel, each in turn supported by further specialist vendors carrying out polygon or deforestation checks, so that, in practice, a single farmer's data, sometimes even personal data, may be passed through numerous hands before reaching the operator ultimately responsible.

One example described an in-situ verification report, containing a farmer's name, identification number and precise location, requested by a buyer several tiers removed from the original collector, with only a two-day turnaround to provide it, raising open questions about consent, data ownership and legal exposure. While the EUDR does not require the passing of farmers' name or other personal information, industry players have nonetheless requested such information in some cases.

A separate example described a multi-layered certification and audit system in which a third-party auditor can visit a farmer or aggregator to check data the farmer did not know had been shared with the scheme in the first place. While this did not appear as common practice, participants noted that some certification organisations and companies already anonymise what they pass to external vendors, for example by replacing personally identifiable information with unique reference numbers that can only be matched back to a farmer's identity using an internal table that is not shared onward, and saw this as a practical model worth exploring more widely.

During the final meeting, participants reiterated the principle, reflected in at least one participating company's own data briefing, that operators should seek farmers' informed consent before collecting, using or sharing their data.

Members also flagged that industry certification schemes in some sectors already hold detailed polygon and legal databases on certified growers, but that mechanisms to anonymise and transfer this data into EUDR-compliant,

smallholder-inclusive supply chains have not yet been fully developed, and saw this as an area worth exploring further.

Three points were flagged as needing further work: first, what and how minimum documentation should be captured when a farmer is first on-boarded as a supplier, so that later compliance queries can be answered without repeat farm visits. Second, the legal question of when a combination of smallholder's farm information with other data is treated as personally identifiable information (PII) under the EU GDPR rules, and whether guidance from competent authorities or the European Commission on acceptable data-handling standards would help align practice across operators. And third, how the European Commission's forthcoming repository of national legislation, to which producing-country governments will voluntarily contribute, will affect which legality-related data companies need to collect, and which EUDR data may be blocked from collection and sharing by governments (e.g. on the basis of national privacy laws).

Separately, several participants noted that rewarding farmers and farmer cooperatives directly for the data they provide is a recurring idea that has been piloted in various forms but has not yet been achieved at scale.

4. Solutions and recommendations

Participants were clear that solutions are rarely tied to only one of the challenges described in Section 3; a given practice, for example a shared pre-screening standard, can at once reduce cost, reduce the risk of false-positive-driven exclusion, and improve a farmer's ability to demonstrate compliance. The table below therefore presents recommendations which may relate to several challenges, together with suggestions on which type of actor (government, private sector, civil society, or a combination) is best placed to take each forward.

At the final meeting on 9 October 2026, participants discussed the practical next steps for each and rated them, through a live polling exercise, by strategic importance and impact. The resulting eight recommendations have been ordered to place those combining high importance and high feasibility first. Recommendations 7 and 8 below score as highly important and impactful, but were flagged as the hardest to deliver quickly; they remain in this report as priorities, not afterthoughts.

#	Recommendation	Addressees	Why it matters	Suggested next steps
1	Policy: Clarify risk-screening, exclusion and due-diligence criteria Clarify risk-screening, exclusion and reintegration criteria, including how the Article 3 exclusion duty interacts with the Article 9–11 due diligence obligations and the Article 24 corrective-action route; and set due-diligence quality criteria so that a robust risk-mitigation system earns proportionate treatment of isolated non-compliance, rather than automatic disengagement.	Competent authorities, EU and/or national policy-makers	Must-have + long-term value. Companies are screening and excluding smallholders now with no agreed criteria. The unresolved tension between Articles 3, 10/11 and 24 pushes operators toward exclusion rather than correction, and there is no clear signal that mitigation efforts are valued over disengagement. Guidance on both points could be issued relatively quickly and would set a shared compliance baseline.	• Welcome further guidance from the Commission on how to address this issue, e.g., through a FAQ or formal guidance on risk-screening, exclusion and due-diligence criteria. • Invite competent authorities to apply a consistent approach across Member States. • Connect with the Smallholder Coalition, which has published closely aligned recommendations on smallholder inclusive risk mitigation.

#	Recommendation	Addressees	Why it matters	Suggested next steps
2	Policy and/or Practical: Shared data, mapping and interoperability standards Development and adoption of shared data, mapping and interoperability standards, plus collectively agreed minimum onboarding documentation (e.g. plot boundaries, establishment date), and recognition of credible national and regional systems, such as Vietnam's national EUDR database, Colombia's APSColombia and ARS-1000 in West Africa.	Member States, producer-country governments, industry, MSIs, EC	Cost-efficiency + long-term value. Rated by participants as having the highest combined strategic importance and impact of the group. Ends repeated registration of the same farmer across companies and lets downstream queries be answered against joint, data-minimising standards without repeat farm visits, building on nationally owned traceability architecture.	• Organise collective initiatives by/with industry actors. • Build on the Dutch competent authority's appreciation of Malaysia's MSPO scheme, alongside RSPO, as a credible private control system (not a 'green lane') • Work toward other origin-country national systems reaching similar alignment and recognition • Harmonise this approach across competent authorities at EU level • Extend support for countries without a national traceability system yet, e.g. Liberia and Sierra Leone
3	Practical: Collaborative ground-truthing and false-positive protocols Adopt collaborative, pre-competitive ground-truthing and false-positive protocols, including a shared field-verification protocol, so that a smallholder verified once by one buyer is not automatically re-checked or excluded by another.	Companies, MSIs, data and certification providers	Must-have + cost-efficiency. The largest avoidable duplication identified in the system: one verification can serve many buyers instead of one visit per buyer, lowering field costs for smallholders, cooperatives and companies alike.	• Build on existing certification standards already carrying out this kind of verification (e.g. in palm oil and soy) • Where certification is not used, rely on a trusted third-party or independent system rather than a single company's own verification • Draw on local NGOs' independent field-monitoring capacity, particularly for smallholders for whom certification is cost-prohibitive

#	Recommendation	Addressees	Why it matters	Suggested next steps
4	Policy and/or Practical: Data-governance and personal-data standards Use data-governance and personal-data standards for cooperatives and exporters, covering consent, access, retention, sharing and correction, with tiered sharing by sensitivity (individual, aggregate-only, or never shared), and clarity on which data is personally identifiable under the GDPR and how data-protection rights are preserved as data moves down the supply chain.	Companies, MSIs, cooperatives, EU and/or national policy-makers, data-protection authorities	Must-have + long-term value. Many producing countries lack enforced data rights or GDPR-equivalent protections; settling this durably protects farmers and reduces operators' own liability.	• Develop a joint data protocol with/for cooperatives and producer organisations, with a standard, minimised set of data requirements and clear consent standards, building on the principle that operators should seek farmers' informed consent before collecting, using or sharing their data • Confirm and communicate clearly whether personal data is actually required for EUDR compliance, since several participants felt companies over-collect • Alignment and clarification of EU and national data-protection laws • Address how the Commission's forthcoming repository of national legislation will affect legality-related data needs, which may vary by country
5	Practical: Appeal and right-to-correction mechanism Have a standard appeal and right-to-correction mechanism in place for farmers to contest exclusion decisions, grounded in their data rights and in companies' own disengagement limitations, mainstreamed across supply chains and built on existing operator appeal models.	Companies, MSIs, certification bodies, with Commission guidance	Must-have + long-term value. Makes data rights enforceable rather than purely declaratory, and brings clarity that disengagement should only ever be a last resort under Article 11, in accordance with general due diligence legislation and standards (CSDDD, UNGP, OECD).	• Build on the role cooperatives can already play in channelling farmer complaints (e.g. the Côte d'Ivoire example discussed) • Explore embedding a right of appeal within national traceability systems as they mature, as well as directly with buyers • Draw on existing grievance-mechanism models, including the European Cocoa Association's guidelines, and the OECD Guidelines and UN Guiding Principles • Identify internal mechanisms already in place at individual companies (e.g. Rainforest Alliance/Fairtrade's, currently underused due to limited internet access) that could be mainstreamed

#	Recommendation	Addressees	Why it matters	Suggested next steps
6	Practical: Equitable cost-sharing and remuneration for farmer data Design and implement an equitable cost-sharing and remuneration scheme for farmer data, combining collective landscape-level funding, rewards for cooperatives that deliver high-quality data, and use of existing government records (e.g. linking certification, registration and tax systems) to reduce collection costs.	Companies, MSIs, donors, EU funding instruments	Long-term value + cost-efficiency. Scored among the most important and impactful of the practical recommendations. Participants stressed this should be framed as sharing the cost of producing compliant data, rather than payment for the data itself, so as not to treat farmer data as a commodity.	• Recognise that data cost-sharing needs to cover ongoing updating and maintenance of data, not only initial collection, since this recurs annually • Meaningfully engage producers and relevant stakeholders in the design and delivery process. • Draw on examples already in use, such as Tony's Chocolony's cooperative premium supporting professionalisation of cooperatives, including data handling • Build on national-level cost-sharing models, such as the one in place for Colombia's APSColombia system
7	Practical: Pre-season screening and “verify once, share many” monitoring Collect and combine pre-season polygon pre-screening — pairing satellite monitoring with mitigation and verification support to resolve data-quality issues before sourcing starts — with farmer- or cooperative-controlled monitoring. Once this ground-level verification is completed, this is shared with multiple buyers rather than repeated by each (“verify once, share many”). Convergence-of-evidence methods help reduce agroforestry false positives, while buyers co-fund pre-competitive initiatives to scale the approach regionally or nationally, building on local systems where they exist.	Companies, with MSIs, cooperatives, exporters, donors, farmer organisations	Must-have + cost-efficiency + long-term value, but flagged by several participants as one of the harder recommendations to achieve in practice. On its own, pre-season screening by an individual company has limited impact; it only delivers its full value once the resulting verification is recognised and shared at supply-chain level, which requires collaboration. Participants pointed to the Brazilian coffee sector's shared risk-assessment platform as the closest existing example of this working at scale.	• Position this as a long-term commitment to work with producers, not a one-off batch check • Pilot shared recognition of pre-season assessments within a single supply chain before scaling further • Build in recognition of cooperatives' contracting role • Pursue policy recognition in parallel, with origin governments implementing and the Commission's appreciation for such efforts, alongside pre-competitive industry collaboration

#	Recommendation	Addressees	Why it matters	Suggested next steps
8	Policy and/or Practical: Consistent, authoritative geospatial reference data Establish consistent, authoritative geospatial reference data, ending the situation where the same plot receives different verdicts depending on an operator's tool, buffers or dataset, including known weaknesses in public protected-area data; shared across companies, authorities and farmers/cooperatives to support risk mitigation.	Competent authorities, or companies/MSIs, EU policy-makers	Must-have + cost-efficiency + long-term value, but, like recommendation 7, flagged by several participants as one of the more challenging to deliver in the near term, since no single map or remote-sensing system is likely ever to be treated as the sole source of truth. A common reference layer would nonetheless cut the risk of disputed assessments and reduce the need for costly, duplicative ground checks.	• Build on examples such as the coffee sector's shared canopy mapping, where recognition matters more than any one data source being declared definitive • Work toward a shared recognition, between operators and competent authorities, of an acceptable margin of error and of good-faith effort as the standard • Align on this across operators and competent authorities in parallel

Prioritisation key: 'Must-have' relates to direct risks for smallholders and/or companies; 'Cost-efficiency' relates to cost-efficiencies for smallholders and/or companies; 'Long-term value' denotes recommendations that require more sustained effort but create lasting value for smallholders and/or companies.

5. Implementation and follow-up

The recommendations in Section 4 differ in maturity. Some describe practices already in use by one or more participants that could reasonably be adopted more widely without further development. Others describe directions the sub-group considers promising in principle but which would need further technical or legal work, piloting, or wider buy-in before they could be implemented, in particular those relating to due-diligence quality criteria, pre-competitive data sharing, and incentive mechanisms for farmers.

Several participants suggested that a group of interested organisations, drawn from this sub-group or the wider Community of Practice, could be convened to continue the practical implementation of one or more of these recommendations, for example to develop common data collection, use and sharing protocols, with dedicated resources pooled across participants.

Organisations that are Brussels based and interested could remain engaged on the policy-facing recommendations, given their existing engagement with EU policy processes in Brussels, including continued work with the Smallholder Coalition and the EU Sustainable Supply Chain Coalition, on messages to the European Commission. The more practical recommendations will need wider engagement from companies and multi-stakeholder initiatives to take up and scale the solutions described; several participants indicated they would like to stay involved in this follow-up work, within the constraints of their own resources, and further organisations are welcome to come forward.

This final report will be shared with the EUDR Community of Practice coordinators ahead of the Core Group's meeting on 20 October 2026, and will be published on the EUDR CoP's webpage once adopted. The Core Group may wish to consider how best to support continued work on the recommendations, alongside its own engagement with the European Commission and competent authorities on the recommendations addressed to them in Section 4.

IDH and Tony's Chocolonely, as co-facilitators of this sub-group, would like to thank all the participating organisations for the time, expertise and candour they brought to this process over its four meetings⁴. The quality of this report reflects their willingness to share real, often sensitive, experience of a genuinely difficult set of challenges, and their constructive engagement throughout in working toward practical, shared solutions.

List of participants

- 60 Decibels
- Barry Callebaut
- Edelsource
- Enveritas
- EFi and Duncan Brack, on behalf of the EUDR Community of Practice
- Fairtrade International
- FERN
- Ferrero
- Hershey's
- IDEF (Côte d'Ivoire)
- IKEA
- ISEAL
- Koompasia Enviro Institute (Indonesia)
- Olam Agri
- Rainforest Alliance
- RSPO
- SOCA2PD (Côte d'Ivoire)
- Solidaridad
- Uganda Coffee Farmers Alliance (Uganda)
- Walter Matter

⁴ The content of this report cannot be attributed to any of the participants. The authors bear sole responsibility for its content.

Annex: Glossary

Chatham House rule: The convention under which the sub-group has met, allowing what was said or shared to be reported without attributing it to the individual or organisation who said it.

Competent authority: The national body in an EU Member State responsible for enforcing the EUDR, including assessing operators' risk mitigation measures and taking corrective action.

Convergence of evidence: An approach to verifying land-use or deforestation status by combining several independent data sources or methods, for example satellite imagery, field visits and farmer records, rather than relying on a single dataset, so that agreement across sources increases confidence in the result.

Cooperative management fee: A per-volume or per-transaction charge built into a buyer's purchase price and paid to a cooperative to fund data collection, mapping, verification and related field programming, so cooperatives do not have to absorb these recurring costs alone.

Data custodianship: The role of holding, managing and being accountable for farm-level data on behalf of others, typically referring to cooperatives, exporters or other intermediaries who collect and hold data on behalf of many smallholders.

Due diligence: The process operators must carry out under the EUDR to collect information, assess risk and mitigate the risk of non-compliant products entering the EU market.

EUDR Community of Practice (CoP): The wider multi-stakeholder forum, of which this sub-group is a part, set up to support the implementation of the EU Deforestation Regulation.

EUDR CoP Core Group: The body of the EUDR Community of Practice to which this sub-group reports, and which will receive this final report.

False positive: A case in which a monitoring system flags a plot or farmer as being at risk of non-compliance, typically deforestation, when field verification subsequently shows there is no such risk.

Forest reference layer (or forest baseline): The dataset used to establish what land was, or was not, forest at a given cut-off date, against which later land-use change is measured. Different actors sometimes use different reference layers, which can produce different risk assessments for the same plot.

Geolocation polygon: The set of coordinates marking out the full boundary of a plot of land, as distinct from a single geolocation point, used to meet the geolocation requirements of Article 9 EUDR.

GDPR: The EU General Data Protection Regulation, which governs the handling of personal data, including the question of when farm-level data, such as a geolocation polygon combined with other information, counts as personally identifiable information.

Ground-truthing: The process of verifying a remote-sensing or desk-based finding through direct, on-the-ground checks, such as a field visit or high-resolution imagery review, before a compliance decision is made.

Interoperability: The ability of different data systems, platforms or standards to exchange and make use of the same information, so that a farmer's data collected by one buyer or system can be recognised and reused by another without being recollected from scratch.

Personally identifiable information (PII): Data that can be used, on its own or combined with other data, to identify a specific individual, and which therefore falls under data protection rules such as the GDPR.

Pre-screening: A structured review of polygons or farmer data carried out before the sourcing season begins, intended to identify and resolve data-quality issues or flagged risks in advance, rather than reacting to them once sourcing is under way. Participants stressed that this works best as an ongoing, long-term commitment to work with producers on both EUDR compliance and broader deforestation mitigation, rather than a one-off seasonal check.

Reintegration pathway: A defined route by which a farmer or plot previously excluded from a supply chain, for example following a confirmed non-compliance, can re-enter that supply chain once the underlying issue has been remediated.

Right of correction: The ability of a farmer to challenge, and have reviewed or corrected, a finding made about their plot or their compliance status.

Structural exclusion: A pattern in which operators exclude smallholders whenever a compliance risk cannot be immediately and conclusively resolved, arising from the incentives created by the regulation rather than from a deliberate policy of exclusion.

Tiered data-sharing: A model for sharing farm-level data in which the level of detail shared varies according to sensitivity, distinguishing, for example, between individual-level data, aggregate-only data, and data that is never shared beyond the original collector.

"Verify once, share many": A model in which a single verification of a farmer or plot, once completed and shared, is recognised by multiple buyers, rather than each buyer independently re-verifying the same farmer.

APSColombia: A Colombian national sustainability standard, cited in Section 4 as an example of a recognised national system with EUDR-relevant data.

ARS-1000: The African Regional Standard used in West African cocoa, cited in Section 4 as an example of a recognised regional system.

Sources & Further Reading

Sub-group process sources

- Member contributions and meeting minutes of the EUDR Community of Practice Sub-group on Smallholders and Data, covering its four meetings held from June to October 2026.
- Scoping Paper, EUDR Community of Practice Sub-group on Smallholders and Data, 15 May 2026.
- Written case submissions shared by sub-group participants.
- Existing research, tools and methodologies shared by participants during and after the sub-group's meetings.
- Survey responses collected from sub-group participants.
- Email correspondence and links shared by participants around and after the sub-group's meetings.

Further reading (public reports and links shared during the process)

- Smallholder Coalition, Towards Smallholder Inclusive Risk Mitigation Under the EU Deforestation Regulation (October 2026).
https://www.fern.org/fileadmin/uploads/fern/Documents/2026/Towards_Smallholder_Inclusive_Risk_Mitigation_Under_The_EU-Deforestation_Regulation_2026.pdf
- Tropenbos, Achieving Deforestation Free Supply Chains (2025).
https://www.tropenbos.org/app/data/uploads/sites/2/Main_Report_Achieving_Deforestation_Free_Supply_Chains-1.pdf
- Tony's Chocolonely, Open Chain Impact Report 2024/25. <https://online.flippingbook.com/view/176457927/>
- Profundo, The real cost of EUDR compliance: what agri-commodities companies need to know.
<https://profundo.nl/projects/analysis-of-eudr-compliance-costs/>
- International Institute for Sustainable Development (IISD), Smallholders and the European Union Deforestation Regulation: Challenges, implications, and pathways to compliance (2026).
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