

Cocoa Insight / March 2024

Preparedness check of Ghana for the EU Deforestation Regulation

Deforestation and forest degradation driven by agricultural expansion are growing at an alarming rate in tropical forest countries. As a major consumer of forest-risk commodities, the European Union (EU) has decided to take action to reduce the impact of its consumption of some of these commodities and products. The EU Deforestation Regulation (EUDR) came into force on 29 June 2023. Its main obligations will apply to all in-scope companies (other than micro-undertakings or small undertakings) from 30 December 2024, and to micro-undertakings or small undertakings from 30 June 2025. The Regulation prohibits operators and traders from placing on the EU market or exporting from the EU, certain commodities (cattle, cocoa, coffee, oil palm, rubber, soya and wood) and derived products, unless they are “deforestation-free”, have been produced in accordance with the relevant legislation of the country of production, and are covered by a due diligence statement including traceability information.

In parallel to the development of the EUDR, the EU initiated policy dialogues on sustainable cocoa with Côte d’Ivoire, Ghana and Cameroon in 2021. These policy dialogues are expected to be sustained and further developed to facilitate the implementation of the EUDR and support producing countries in addressing sustainability challenges. Structured dialogues will be put in place to support producing countries’ frameworks to ensure sustainable commodity production and trade.

This preparedness check aims at providing an overview of existing policies, tools and data in Ghana that could support cocoa operators’ EUDR due diligence efforts, as well as identifying outstanding challenges for the compliance of the Ghanaian cocoa supply chain. To do so, this paper provides a state of play – to be regularly updated – of the cocoa sector in Ghana when it comes to traceability, deforestation and legality and standards.

1. Traceability requirements

The EUDR requires that operators collect the following information, accompanied by evidence: the geolocation coordinates of all plots of land where commodities and products were produced (Art. 9 (1.d)), for plots >4 hectares, GPS polygons are required (Art. 2(28)), the date or time range of production (Art. 9 (1.d)), and last supplier information (Art. 9 (1.e)).

1.1 State of play

COCOBOD is currently developing a digitised Cocoa Management System (CMS), an integrated system that will include several modules to manage traceability and purchasing, farm and farmer information, input distribution, quality control, the farmer pension scheme, and information on Licensed Buying Companies (LBCs) and the Purchasing Clerks. **The backbone of the CMS will be the Ghana Cocoa Traceability system (GCTS), which aims to provide full digitised physical and financial traceability from farm to point of export.** The system will capture all cocoa transactions in real time. The GCTS is being piloted and is planned to be operational by the end of 2024.

As part of the CMS, COCOBOD will manage farmer information and has completed a national cocoa farmers' registration exercise and mapping of cocoa farms, including GPS coordinates. This resulted in the registration of 792,954 farmers in cocoa-growing regions, with 1,239,169 farms covering 1,373,756 ha. Farmers are registered with unique IDs, and the GCTS will track cocoa and cocoa purchases through the supply chain using the tagging system (QR code embossed on a tag).

The development of the GCTS is completed: the IT system is developed and the COCOBOD is now carrying out a pilot in two districts, including the development of standard operating procedures, farmer sensitisation, procurement of equipment, and training of stakeholders and roll-out.

Large trading companies have developed their own traceability systems, primarily **focusing on tracking cocoa from their direct supply chains and mostly back to the first point of purchase (LBCs)**. Traceability efforts are sometimes combined with mapping of cocoa farms and collection of data on the farmers to inform their supply management and sustainability programmes. **Despite progress in mapping their cocoa sourcing areas, only a fraction of cocoa bought by international traders is traceable.** Cocoa and Forests Initiative (CFI) signatory companies reported that 72% of cocoa in their direct supply chains is traceable, and in 2022, 339,928 farms had been mapped¹.

The GCTS will ensure that all farms are mapped, and cocoa is traced in a unique centralised system, addressing the issues of first mile traceability and indirect sourcing. Once implemented, it is intended to provide the traceability and geolocation information required under the EUDR.

¹ CFI 2022 Annual Report. <https://www.idhsustainabletrade.com/uploaded/2023/09/2022-Report-Cocoa-and-Forests-Initiative-Ghana-2.pdf>

This effort will also support the future implementation of the African Regional Standard on Sustainable Cocoa (ARS-1000), which requires cocoa plot polygons. The ARS-1000 also aims at reinforcing cooperatives as key actors in the cooperative value chain.

1.2 Remaining challenges

While the EUDR places obligations on operators, COCOBOD's role in the supply chain makes its development of a national traceability system essential to facilitate operator due diligence. COCOBOD through the Cocoa Marketing Company has the monopoly on cocoa trade and would be, under the EUDR, considered as a trader supplying cocoa to operators who would place the cocoa on the EU market. Given this and its oversight and integration throughout the supply chain, COCOBOD is uniquely placed to capture information on the entire supply chain and provide the required geolocation and traceability information to operators supplying the EU market.

However, developing a comprehensive national system to trace all cocoa and that can provide relevant, accurate and up-to-date information for due diligence purposes is complex. Ensuring the **reliability of data** is essential for the functioning of the CMS, and procedures should be in place to ensure that all farmers and farms are registered correctly and regularly updated. Chain of custody information must also be correctly linked to true cocoa origins and transmitted with each bag of cocoa.

If the national system will be relied on for due diligence purposes, it is important that COCOBOD establishes trust with supply chain actors on the **credibility of the system**. Confidence in the system could be fostered by transparency in the development of the CMS and operating procedures, verification and auditing of the system (including by independent third parties) and information sharing. A governance framework with well-defined actor responsibilities, data management and sharing protocols, training, and sensitisation efforts, as well as cost-sharing, could bolster the system. Additionally, implementing risk mitigation measures to identify and address issues such as leakage, fraud, and illegal border trafficking is crucial for enhancing effectiveness.

2. Deforestation-free criteria

The EUDR requires that operators collect adequately conclusive and verifiable information that relevant products are deforestation-free (Art. 2(13) and 9 (1. g)). Cocoa produced on lands converted from forests after 31 December 2020 would not be considered deforestation-free and would not conform with EU requirements. Forests are defined according to the FAO definition (Art. 2(4)).

In this context, useful data and tools might include:

- Forest cover at the cut-off date (31 December 2020)
- Permanent national forest monitoring system
- Deforestation alerts

2.1 State of play

Ghana has produced **land use/cover maps for 2019 and 2021**². The land use/cover maps include relevant layers, such as monoculture cocoa, shaded cocoa and forest cover that provide useful information on land use dynamics. The forest cover layers were based on the canopy cover thresholds used nationally, outlined in the REDD+ programme. The use of the FAO definition in the EUDR may mean there are differences³ in areas considered forests.

The map production incorporated robust methodology including consultation and validation by experts and local stakeholders, resulting in high accuracy. They are available publicly for viewing but are not downloadable. Biennial updates of the national land use/cover maps are planned, subject to funding availability.

The Forestry Commission, Kwame Nkrumah University of Science and Technology and Ecometrica have partnered to develop the Ghana Forest Compliance Service, a platform adopted by CFI in Ghana to provide land use/cover data and CFI commitment compliance information to signatory companies.

CFI has also engaged the Forestry Commission Resource Management Support Centre (RMSC) to provide deforestation analysis and risk maps for 2019–2022 in the six Hotspot Intervention Areas to improve understanding of land use dynamics in their signatory companies' sourcing areas.

In parallel, the Forestry Commission has planned to develop a **National Forest Monitoring System**, which would include a deforestation alert system. A forest monitoring portal has been piloted.

Deforestation risk monitoring for cocoa

As part of the CMS, COCOBOD is developing a **deforestation risk assessment module** (DRM) that will link cocoa supply chain data (e.g. cocoa polygons) to forest cover and protected area information. The objective of the DRM is to monitor non-compliance risks related to the EUDR. Cocoa will be classified as 'sustainable' if it is determined that it was not grown in areas deforested after 2020, nor illegally within protected areas. Otherwise, it will be classified as 'conventional'. Cocoa would then be segregated. The intention is to provide operators sourcing cocoa from Ghana with relevant information to carry out their risk assessment.

² The maps were produced through a partnership with the Forestry Commission Resource Management Support Centre (RMSC), Kwame Nkrumah University of Science and Technology (KNUST), the United Kingdom (UK) Space Agency, and Ecometrica in the context of the UK-funded Forest 2020 project.

³ Under REDD+ in Ghana, forests are any piece of land with a minimum area of 1 hectare, with a minimum canopy cover of 15% and with trees that have the potential to reach or have reached a minimum height of 5 metres at maturity in situ. The forest definition excludes agricultural trees such as rubber, cocoa, oil palm, fruit and nut trees. The national land use maps used a minimum mapping area based on 30m resolution. The EUDR uses the FAO definition of forests as 'land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use'.

2.2 Remaining challenges

Nationally endorsed reference data for EUDR due diligence is unavailable in Ghana. Existing national land use/cover maps are **not completely aligned** with the EUDR requirements, specifically on the 2020 cut-off or forest definition. Furthermore, the relevant government institutions or stakeholders **do not have access to the maps** in downloadable formats (e.g. raster files) that could be integrated into risk assessments as part of a due diligence process.

Ghana **does not have an operational forest monitoring system**, and historically, forest mapping and monitoring efforts have advanced piecemeal and were project-based. The lack of funding prevents putting a national system in place. A national forest monitoring system could provide official reference information on forests to facilitate due diligence for the EUDR, inform country benchmarking, monitor risks of future deforestation and raise alerts, thereby supporting efforts to improve cocoa sustainability and reduce deforestation.

3. Legality criteria

The EUDR requires that operators collect adequately conclusive and verifiable information that the relevant commodities were produced in accordance with the “relevant legislation of the country of production” (Art. 9 (1.h) and Art 2(40)).

Relevant legislation of the country of production is defined as the laws applicable in the country of production concerning **the legal status of the area of production** in terms of: land use rights; environmental protection; forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting; third parties’ rights; labour rights; human rights protected under international law; the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples; and tax, anti-corruption, trade and customs regulations’ (Art. 2 (40)).

Consequently, operators who place cocoa or cocoa products on the EU market must ensure that they have been produced in accordance with the relevant Ghanaian legislation applicable to the area of production. It is our understanding that the EUDR legality criteria does not cover the entire cocoa supply chain.

Further guidance on the legality criteria is expected from the European Commission before the EUDR’s entry into application.⁴ Yet stakeholders can already identify which national requirements concerning the relevant areas of law will be applicable, discuss the information, documents and data required to demonstrate legality, as well as potential needs for clarification of the legal framework.

In this context, useful data and tools might include:

- Identification of the relevant legal instruments
- Lists of documents, information and data that can serve as evidence of legal compliance
- Up-to-date forest reserve, national park and other protected area boundaries
- Up-to-date boundaries of admitted farms

⁴ https://green-business.ec.europa.eu/implementation-eu-deforestation-regulation_en

3.1 State of play

Below is an initial overview of the legal requirements relevant to the area of cocoa production in Ghana. It does not constitute a thorough evaluation of the applicable legal framework or its enforcement. A more in-depth analysis is essential to comprehensively map the relevant legal requirements across all the areas of law outlined in the EUDR and assess their implementation. This would include identifying the relevant international treaties ratified by Ghana and the degree to which they have been transposed into national law. This would enable evaluating the availability of documents, information and data that can substantiate compliance.

Land-use rights

In Ghana, **there is no requirement to demonstrate land-use rights to cultivate cocoa, as long as it is done in an authorised area.** So, although farmers often do not possess proof of land-use rights, these are not required in these areas under the national legal framework. The Land Act of 2020 regulates land ownership and tenure. It also provides for the creation of Customary Land Secretariats and land registrations. Currently, there is no comprehensive land registry and cocoa farms are not yet fully registered.

Cocoa production is prohibited within forest reserves except in areas recognised as admitted farms. There is limited available documentation of admitted farm status. The admitted farm boundaries should be listed in the forest management plans of each forest reserve, and some have recently been digitised by RMSC. Nonetheless, this data is not shared publicly. The expansion of cocoa farms beyond admitted farm boundaries within forest reserves is a growing concern and a highly sensitive political issue, but the extent of illegal cocoa encroachment in forest reserves has yet to be publicly determined. The **COCOBOD DRM will assess the risk of cocoa illegality specifically related to whether cocoa was produced in prohibited areas in protected areas.** This information will be incorporated into the GCTS and made available to cocoa buyers. The data sharing modalities are under development.

In off-reserve areas, conversion from forest to agricultural land uses is legally allowed, but the felling of economic trees requires permission from the Forestry Commission (Timber Resources Management Act of 1998, Act 547).

Environmental protection

Environmental impact assessment: The Environmental Assessment Regulations, L.I. 1652 of 1999 amended in 2002, require that all developmental activities likely to impact adversely on the environment be subject to environmental assessment. The requirement applies to agricultural activities that either involve the clearing of land: greater than 40 hectares in area; or in an environmentally sensitive area. Smallholder cocoa farmers would therefore not be required to carry out an environmental impact assessment unless their activities are carried out in an environmentally sensitive area.

Pesticide and fertilisers: Their use is regulated by Environmental Protection Agency Act, 1994 (Act 490), the Pesticide Control and Management Act, 1996 (Act 528) and the Plant and Fertiliser Act 2010 (Art. 803).

Water: Its use is regulated by the Water Resources Commission Act, 1996 (Act 522) and the Water Use Regulations, 2001 (L.I. 1692). These texts outline the procedures to apply for and grant of authorisation by the Commission to use water, including for agricultural water use.

Farmers will likely lack explicit proof of compliance with environmental norms, such as a certificate from an environmental inspectorate. Consequently, it falls upon the operator when exercising due diligence to assess whether this legal aspect poses any risk of non-compliance.

Third parties' rights

Public participation in environmental regulation involves the Environmental Protection Agency overseeing environmental impact assessments in response to public concerns about proposed large-scale projects. Further, Ghana's National Land Policy emphasises community involvement in land management for sustainable urban and rural development. And the Lands Commission has developed draft guidelines for large-scale land transactions, aligning with international texts like the FAO Voluntary Guidelines.

However, regulations pertaining to public consultation for large-scale projects would not apply to small-scale cocoa farming activities, which constitute over 90% of Ghana's cocoa farming.

Labour rights

The Labour Act, 2003 (Act 651) contains provisions on the maximum working hours, overtime work, paid leave for pregnant and nursing mothers, and safety at work. For a discussion of the legal framework regarding child labour, see the section below on human rights.

Not all requirements applying to permanent workers apply to seasonal workers. Most labour relations among smallholder farmers are likely to be informal. Consequently, it falls upon the operator when exercising due diligence to assess whether this legal aspect poses any risk of non-compliance.

Human rights

Child labour: Ghana is a party to the International Labour Organization (ILO) Convention on the Worst Forms of Child Labour (No. 182).⁵ The Children's Act of Ghana, 1998 (Art. 560), states that a child of 13 years may be engaged in light work, which is not hazardous and does not affect the child's attendance at school or capacity to benefit from schoolwork. The Act also allows a child of 15 years to be fully employed if not hazardous.

Ghana has also enacted specific legislation to address child labour issues in the cocoa sector. The Cocoa Industry (Child Labour) (Amendment) Act, 2009 (Act 879) outlines measures to combat child labour, including provisions for monitoring and enforcement. Further, in collaboration with international organisations and stakeholders, Ghana developed a National Plan of Action to eliminate the worst forms of child labour in the cocoa sector. The Plan outlines strategies, interventions, and timelines for addressing child labour issues.

⁵ See also section below on human rights.

Finally, the Hazardous Child Labour Regulations, 2017 (LI 2263), enacted under the Labour Act, define and prohibit hazardous work for children. They provide guidelines for determining what constitutes hazardous work and outline measures for identifying and eliminating such work in various sectors, including cocoa farming.

The government of Ghana has issued a National Action Plan and developed a National Child Labour Monitoring System. Ghana has been working with international organisations, including ILO and the United Nations Children's Fund to address child labour in the cocoa sector.

A number of prevention, remediation and mitigation activities are also implemented through voluntary certification schemes, NGO programmes and corporate sustainability initiatives, to address child labour in the cocoa sector.

The COCOBOD is developing a Cocoa Sector Child Labour Monitoring System, which will be linked to the National Child Labour Monitoring System for the reporting and referral of cases. It will also be linked to the Ghana Cocoa Traceability System, and will provide information on the risk of non-compliance with national laws related to child labour.

Other human rights

Ghana is a Party to the Convention on the Elimination of All Forms of Discrimination against Women, the International Convention on the Elimination of All Forms of Racial Discrimination, the International Covenant on Economic, Social and Cultural Rights, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families and Conventions on Minimum Age (Convention No. 138) (minimum age specified: 15 years) and on the Worst Forms of child Labour (Convention, No. 182).

FPIC

Ghana is not a party to the ILO Convention 169 and free, prior, and informed consent (FPIC) is not explicitly incorporated into the legal framework. Nonetheless, it contains certain aspects of its elements. Under the Constitution, customary authorities have the right to decide on customary land matters. The Chieftaincy Act, 2008 (Act 759), emphasises that land disposition decisions by customary authorities require consent from elders and community members, aiming to benefit the entire landowning community. However, cocoa production by smallholder farmers is typically conducted on a small scale, whereas FPIC is more commonly associated with major projects that have significant impacts on communities. FPIC is therefore likely to be irrelevant to smallholders' cocoa production.

Anti-corruption

Ghana ratified both the Convention against Corruption and the African Union Convention on Preventing and Combating Corruption in 2007. There is no singular piece of legislation to tackle corruption, but the criminal code criminalises corruption in the form of active and passive bribery, extortion, wilful exploitation of public office, use of public office for private gain and bribery of foreign public officials.

The National Anti-Corruption Action Plan of 2014 aims to improve the prevention, investigation and prosecution of corruption by strengthening several state agencies and putting a premium on public awareness of corruption. However, a UN report of February 2015 underscored challenges in the government's ability to execute its anti-corruption policies and prosecute offenders effectively.

Ghana scored 43 points out of 100 on the 2022 Corruption Perceptions Index⁶ (CPI) reported by Transparency International, ranking 73 out of 180 countries.

In their risk assessments under due diligence obligations of the EUDR, operators will need to consider the level of corruption in the sourcing country when selecting valid evidence of legal compliance.

Tax, trade and customs

Trade: The cocoa trade is extensively governed by the Ghana Cocoa Board Act of 1984. The Act mandates COCOBOD to exercise centralised control over the sale and trade of cocoa, with powers over the purchase, inspection, grading, sealing, certification, export and sale of cocoa. Only COCOBOD or persons or organisations authorised by the COCOBOD are allowed to purchase cocoa. The COCOBOD issues licences to cocoa buyers (LBCs). No person shall market or sell cocoa unless authorised by the COCOBOD. The Government sets the minimum farmgate price to be paid to farmers, at the beginning of each season.

Cocoa produced in Ghana is graded under the Cocoa Industry (Regulation) (Consolidation) Decree, 1968 (NLCD 278).

Customs: COCOBOD is backed by law to sell cocoa which is not subject to any customs duty or regulations. Cocoa is thus exempted from any form of custom regulations.

The scope of the legality criteria is confined to the area of production, and further assessment would be needed to understand to what extent requirements along the supply chain, including on trade and tax would apply.

⁶ The CPI ranks 180 countries and territories around the world by their perceived levels of public sector corruption, scoring on a scale of 0 (highly corrupt) to 100 (very clean). EC guidance on the EU Timber Regulation cite the CPI as one of the most commonly used indicators of corruption levels.

ARS-1000

- The ARS-1000 was adopted on 15 June 2021 by members of the African Standards Organisation. Ghana supported the drafting of the standard and developed a national operational guide, which complements the standard and was made available in December 2023.
- The Ghanaian Government plans on making the standard mandatory for the sector.
- The ARS-1000 could play a role in facilitating operators' due diligence under the EUDR and harmonising their due diligence approaches. Indeed, the information collected and verified under ARS-1000 in terms of product traceability, environmental and social sustainability, and legality could provide operators with relevant data for the risk assessment required by the EUDR. However, the ARS-1000 certification is not sufficient to ensure full compliance with the EUDR and was not adopted for this purpose.

3.2 Remaining challenges

A map of admitted farms' boundaries or documentation of rights to farm within forest reserves will be necessary to determine the legality of cocoa produced in these areas. However, protected area boundaries are not publicly available, and concerns have been raised about the accuracy of boundary maps. Further, while some admitted farm boundaries have been mapped by the Forestry Commission, this data is not available to other government institutions, such as COCOBOD, nor publicly available. **Updating and making publicly available legal and spatial reference data on forest reserve boundaries and admitted farms** would greatly mitigate operators' non-compliance risks and potentially avoid the unnecessary exclusion of farmers.

Government policy documents and commitments provide conflicting guidance about forest conversion and cocoa legality. Under the CFI, Ghana committed to no further conversion of forests for cocoa. However, in the same commitment, cocoa production can continue for a period up to 25 years in the most degraded forest reserves (classified as conditions 4 and 5 in the national system) and in highly degraded off-reserve forest lands⁷. Despite being permitted under the CFI Framework for Action, cocoa produced in these degraded forest reserves resulting in forest conversion after the cut-off date would not be considered deforestation-free under the EUDR and could not be exported to the EU. In addition, as long as this commitment is not translated into law, cocoa produced in forest reserves remains non-compliant with the legality requirement.

⁷ <https://www.idhsustainabletrade.com/uploaded/2017/03/NATIONAL-IMPLEMENTATION-PLAN-Ghana.pdf?x16739>

The table in annex summarises the potential compliance of cocoa based on the type of conversion the land it is produced on has been submitted to.

Overall, the legality of cocoa in Ghana is complex and several aspects require in-depth analysis. Cocoa operators could benefit from **guidance on the applicable scope of legality** under the EUDR in the context of Ghana, and relevant data and information that can be collected to provide evidence of legality and conduct due diligence. Some voluntary third-party certification schemes may serve as a tool, or a proxy, but they cannot replace a due diligence process, nor do they cover the full production volume of Ghana. ARS certification, once implemented, could potentially contribute to demonstrating EUDR compliance, but further analysis is needed to assess to what extent it would be aligned with EUDR and could serve as a tool to facilitate due diligence.

4. Conclusion

This preparedness check offers an overview of the current policies, tools and data landscape in Ghana related to traceability, deforestation, and legality that can support cocoa sector actors in navigating the complexity associated with demonstrating compliance with the due diligence obligations of the EUDR. The establishment of a national traceability system with a deforestation risk assessment module and a child labour monitoring module can serve as a key support for operator due diligence through the provision of cocoa plot geolocation and chain of custody information. However, challenges related to data reliability and the development of a robust and fit-for-purpose system infrastructure must be managed, while minimising the risk of issues related to leakage, fraud and illegal trafficking. The lack of availability and consensus on reference forest data pose a potential obstacle, requiring collaborative efforts to make information available, to align on data use for due diligence and to support national mapping efforts. Lastly, achieving clarity on the scope of legality under the EUDR and the information that could be used as evidence of compliance could further facilitate due diligence.

Annex: EUDR compliance table

The table below summarises the potential compliance of cocoa with the EUDR based on **the land use category** and **the type of land cover/use (on 31 December 2020)** of the plot where the cocoa was produced:

Land use category	Land cover/use (as of 31 December 2020) of the plot where the cocoa was produced	Legality criteria ¹ (with regards to land-use rights)	Zero deforestation criteria	EU market placement
Protected areas (e.g. forest reserves)	Forest ²	Non-compliant	Non-compliant	Non-compliant
	Agriculture	Non-compliant	Compliant	Non-compliant
Admitted farm ³ in forest reserve	Forest ²	Compliant	Non-compliant	Non-compliant
	Agriculture	Compliant	Compliant	Potentially compliant ¹
Off-reserve	Forest ²	Compliant ⁴	Non-compliant	Non-compliant
	Agriculture	Compliant	Compliant	Potentially compliant ¹
	Other, including wooded land ⁵ or grassland ⁶	Compliant	Compliant	Potentially compliant ¹

1 Only with regards to land-use rights. Compliance also requires that cocoa be produced in accordance with other relevant legislation of Ghana (labour rights, environmental protection, tax and customs...) and that a due diligence statement covering the products be submitted by the operator.

2. In this table, forests are understood as per the FAO definition (land spanning more than 0.5 hectares with trees higher than 5 metres and a canopy cover of more than 10%, or trees able to reach those thresholds in situ).

3. Accurate boundaries of admitted farms might still be missing in certain regions or not be publicly available to operators.

4. Forest conversion off-reserve is subject to an authorisation for tree harvesting from the Forestry Commission.

5. Other wooded lands are understood as per the FAO definition (land not classified as 'forest' spanning more than 0.5 hectares with trees higher than 5 metres and a canopy cover of 5 to 10%, or trees able to reach these thresholds in situ, or with a combined cover of shrubs, bushes and trees above 10 percent). In Ghana, these are mainly savannah areas. The potential inclusion of other wooded lands will be the subject of an evaluation conducted no longer than 1 year after entry into force of the EUDR.

6. The potential inclusion of grasslands will be the subject of an impact assessment conducted no longer than 2 years after entry into force of the EUDR.

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The European Forest Institute is one of the implementing partners of the EU Sustainable Cocoa Programme in Côte d'Ivoire, Ghana and Cameroon. We are supporting producer countries in developing robust standards and tools to achieve traceable and deforestation-free cocoa. Information and publication of EFI's Sustainable Cocoa Programme can be found here: <https://efi.int/partnerships/cocoa>

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