FOREST TRENDS

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HOW THE EUDR IS ALREADY DRIVING FOREST GOVERNANCE REFORM: FROM MARKET SIGNAL TO SYSTEMIC IMPACT

DUNCAN BRACK

ABOUT FOREST TRENDS

Forest Trends Association is a 501(c)(3) organization founded in 1999. Forest Trends works to conserve forests and other ecosystems through the creation and wide adoption of a broad range of environmental finance, markets, and other payment and incentive mechanisms. Forest Trends does so by 1) providing transparent information on ecosystem values, finance, and markets through knowledge acquisition, analysis, and dissemination; 2) convening diverse coalitions, partners, and communities of practice to promote environmental values and advance development of new markets and payment mechanisms; and 3) demonstrating successful tools, standards, and models of innovative finance for conservation.

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Executive Summary

Demand-side regulations like the EU Deforestation Regulation (EUDR) are designed to shift global production toward deforestation-free and legal supply chains by restricting access to key consumer markets. While there has been concern that such measures would create narrow “compliance islands,” early evidence suggests a more complex and potentially transformative dynamic is emerging.

KEY FINDINGS AND MESSAGES

- **Initial responses were rapid but largely confined to private-sector “compliance islands.”**

  Immediately following the EUDR’s adoption, private-sector initiatives focused heavily on ensuring compliance within specific supply chains—developing traceability tools, securing geolocation data, and tightening sourcing relationships for exports to Europe. These efforts have been rapid and visible, but inherently limited in scope, often confined to individual companies or export-oriented segments.

  Critically, there are structural gaps that private actors cannot address alone, such as incomplete or unreliable land registries, unclear tenure systems, and weak national traceability frameworks. These fall squarely within government mandates, and without them, private-sector initiatives cannot scale or easily find enough producers for robust supply chains.

- **Government responses were slower but are now driving more systemic change.**

  Most producer-country governments initially required more time to coordinate across agencies and stakeholders. However, there is now growing evidence of national, subnational, and sectoral initiatives that go beyond individual supply chains and have the potential to reshape entire commodity systems at subnational or national levels.

  As of February 2026, the research revealed at least 25 producer countries are already implementing over 60 government-led initiatives linked to EUDR compliance, many of which address systemic governance gaps, such as land tenure, traceability, and legal clarity that extend far beyond individual supply chains.

  Many countries are implementing multiple initiative types simultaneously (e.g., mapping + registration + traceability). The strongest activity is in cocoa and coffee-producing countries, where the EU’s share of global consumption, and therefore its impacts on global markets, is highest.

- **The EUDR is catalyzing national reforms that the private sector cannot deliver alone, despite their importance for robust supply chains.**

  These national-level reforms are also critical for the private sector. Many of the core requirements for the EUDR, such as traceability, legality verification, and geolocation depend on underlying public systems that individual companies cannot build on their own. Issues such as unclear land tenure, fragmented data systems, and lack of national registries have long posed structural barriers to both legality verification and deforestation monitoring (and thus to broader private sector investment). But government action, on national traceability frameworks, farmer registries, and clearer legal and regulatory systems, are essential to enable companies to establish compliant supply chains at scale. By strengthening these systems, governments help to expand the pool of producers able to meet private sector due diligence requirements, reducing compliance costs, lowering risk, and increasing market access for producers. Without these enabling conditions, compliance remains costly, fragmented, and limited in scale.

Table 1. Countries with EUDR-related Government Initiatives

Africa (10)	Cameroon, Côte d'Ivoire, Ethiopia, Ghana, Kenya, Liberia, Nigeria, Rwanda, Tanzania, Uganda
Asia (6)	India, Indonesia, Malaysia, Sri Lanka, Thailand, Viet Nam
Europe (1)	Ukraine
Latin America (8)	Argentina, Brazil, Costa Rica, Ecuador, Guatemala, Honduras, Peru, Uruguay

Table 2. Types of Initiatives (for more details, see Section 3)

Initiative Type	Numbers of Countries	Countries
3.1 Legality: Definitions, Clarifications, and Reforms		
Legal Framework Reviews / Reforms	7	Brazil, Cameroon, Ghana, Kenya, Honduras, Peru, Ukraine
3.2 Traceability Systems, Forest and Land Mapping, and Titles and Farmer Registration		
Traceability Systems (National or Sectoral)	19	Cocoa (Côte d'Ivoire, Ghana, Liberia, Nigeria), coffee (Ethiopia, India, Kenya, Liberia, Rwanda, Tanzania, Uganda, Viet Nam), palm oil (Indonesia, Malaysia), beef and soy (Argentina, Brazil, Uruguay), rubber (Sri Lanka, Viet Nam), timber (Costa Rica, India, Indonesia, Uruguay, Viet Nam), all commodities (Thailand)
Farmer Registration	12	Cameroon, Côte d'Ivoire, Ecuador, Ethiopia, Ghana, India, Kenya, Peru, Rwanda, Sri Lanka, Tanzania, Uganda
Land / Farm Geolocation and Mapping	11	Cameroon, Ecuador, Ethiopia, Ghana, Honduras, Kenya, Peru, Rwanda, Sri Lanka, Tanzania, Thailand, Viet Nam
Digital Platform Development	10	Cameroon, Côte d'Ivoire, Ghana, India, Indonesia, Rwanda, Sri Lanka, Tanzania, Thailand, Ukraine
National Certification / Standards Alignment	6	Cameroon, Côte d'Ivoire, Ghana (all ARS-1000), India (IWFCS, INDICOFS), Indonesia (ISPO), Malaysia (MSPO)
Forest Monitoring Systems (Satellite / Alerts)	2	Brazil, Côte d'Ivoire
3.3 Strategic Planning, Coordination, and General Preparedness		
EUDR Preparedness Incorporated into National or Major Sectoral Strategy	4	Ethiopia, Nigeria, Peru, Viet Nam
Institutional Coordination Bodies (Taskforces, Committees)	12	Cameroon, Honduras, Kenya, Liberia, Malaysia, Nigeria, Peru, Rwanda, Thailand, Uganda, Ukraine, Viet Nam
3.4 Dialogue with Stakeholders		
Stakeholder Dialogue Platforms	11	Cameroon, Ethiopia, Guatemala, Liberia, Nigeria, Peru, Rwanda, Tanzania, Thailand, Uganda, Viet Nam

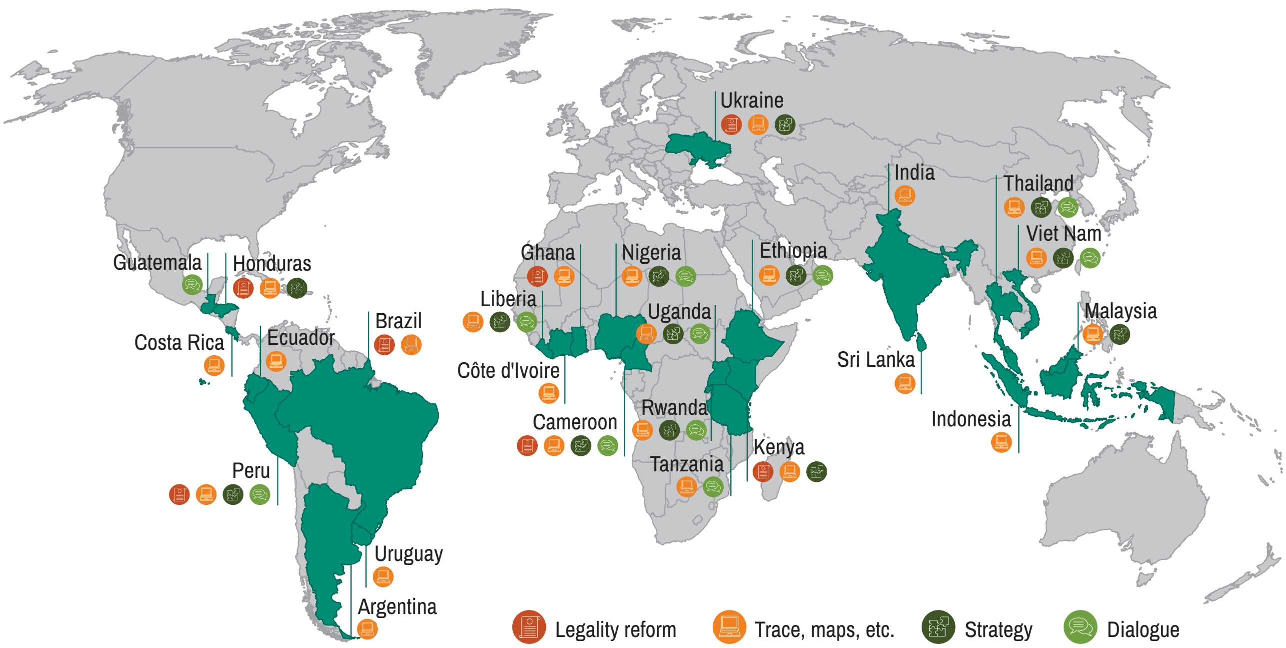
- **Political ownership is emerging, even if quality and outcomes remain uncertain.**

  Importantly, these initiatives are emerging at multiple levels (national, subnational, and sectoral) and demonstrate growing political ownership. While this report does not assess the quality, inclusiveness, or effectiveness of these efforts, it highlights that they are happening, and at scale. This distinction is critical: the presence of government-led action signals a shift from externally driven compliance toward domestically embedded reform processes. It also highlights the need for careful attention to implementation quality.

- **Donor strategies should align with momentum, not attempt to create it.**

  For donors and development partners, this has important strategic implications. Rather than attempting to initiate reforms in contexts where there is limited political will, there is an opportunity to support and strengthen initiatives that governments are already prioritizing in response to market incentives. Targeted support can help ensure these systems, particularly land registries, traceability platforms, and legal frameworks, are designed and implemented in ways that are robust, equitable, and inclusive, while also remaining practical for responsible companies to navigate.

Figure 1. Types of Initiatives and Their Geographies (for more details, see Section 3)



More broadly, the findings suggest that demand-side regulations, such as the EUDR, can be powerful catalysts for change when they send clear, credible, and consistently enforced market signals. However, such regulations only drive systemic change if they are backed by similarly credible, consistent enforcement; private-sector efforts alone will not shift entrenched national systems. When combined with well-targeted support, they can help to drive reforms that extend well beyond compliance requirements, contributing to improved forest governance, greater transparency, and more sustainable production systems. In a context of less development assistance, robust implementation of these regulations represents one of the most cost-effective ways in which to catalyse reform and target limited donor resources where they can have greatest impact.

Currently, with the EUDR at risk of being renegotiated for the third time, it is important for the EU to make no further changes to the regulation, to bring it fully into application on schedule and, once it is in place, to enforce it rigorously so that the momentum for change in producer countries is not lost.

1 Introduction

Demand-side measures, such as the EU Deforestation Regulation (EUDR), aim to tackle global deforestation by prohibiting the import or production of agricultural or timber market commodities whose production has been associated with deforestation. These measures are intended to complement producer countries' own efforts to enforce domestic laws and strengthen the governance of forest land management by creating a trade-linked incentive to produce and export products which are free of deforestation.

An obvious weakness of this approach is that only part of a producer country's commodity production may meet zero-deforestation requirements, or that portion exported to the country or jurisdiction applying the measure (in this case the EU). The rest of the supply chain may continue to operate under weaker or poorly enforced standards creating a "compliance island" effect which potentially limits any broader impacts on forest governance.

However, producer-country governments or businesses may instead choose to apply higher standards or implement broader improvements, applying them across the country or sector as a whole and therefore affecting all production, not just exports. This outcome is more likely when:

Source: Shutterstock

Demand-side measures, such as the EU Deforestation Regulation (EUDR), aim to tackle global deforestation by prohibiting the import or production of agricultural or timber market commodities whose production has been associated with deforestation.

- the regulated consumer country accounts for a significant share of the producer country's exports;
- there are clear direct benefits to the producer country, for example through improving revenue collection or market access;
- reputational gains from meeting higher standards are important to the producer country; and
- financial and/or technical assistance with compliance is provided to the producer country.

This report examines the extent to which countries that are major producers of the seven commodities covered by the EUDR—cattle products (beef and leather), cocoa, coffee, palm oil, rubber, soy and wood products—have 1) implemented national, sub-national, or sectoral reforms designed to meet the requirements of the EUDR, and have 2) the potential to affect production for other destinations as well, whether exports or the domestic market. It looks only at public measures (i.e. those implemented by producer-country governments). There has also been a very wide range of private-sector initiatives in response to the EUDR, but they fall outside the remit of this research, except where they have been implemented in collaboration with governments.

2 The EUDR and Its Challenges

Source: Shutterstock

Supply chains within producer countries are also often complex, involving several intermediate steps between the farmer or forester and the company that exports it or places it on the EU market.

The EUDR came into effect in June 2023 and is now due to enter fully into application for most companies at the end of 2026. Its core aim is to ensure that a designated list of forest-risk commodities and products placed on the EU market, or exported from the EU, satisfy two criteria: 1) they must be deforestation free, and 2) have been produced legally, in accordance with laws applicable in the country of origin.

The companies first placing the products on the EU market, or exporting them from the EU ("operators") are required to exercise "due diligence" to avoid placing or exporting non-compliant products. This due diligence process involves three steps: collecting information about the products, including geolocation data for their places of origin; assessing the risk that the products may not meet the criteria; and, if necessary, implementing measures to mitigate the risk to a negligible level. The regulation also includes a "benchmarking system," placing producer countries, or parts of them, in three tiers of risk: high, standard, and low. Operators sourcing products from low-risk countries will be subject to a simplified due diligence procedure, which includes only the information collection requirements, without the risk analysis or mitigation steps. The benchmarking level of the countries from which a company sources its products also determines how frequently it may be scrutinized by EU member-state enforcement authorities. (Full details of the EUDR in Annex 1).

Suppliers in product countries of origin have no direct obligations under the EUDR; it is only companies with a presence in the EU that are subject to its requirements. However, as part of their commercial relationships, a supplying company must be able to collect and pass on the information necessary to enable the EU-based operator to place their products on the EU market, including evidence that the products are legal and deforestation-free, and information on their origin, including the geolocation data for the place of harvesting.

This poses challenges for many suppliers based in low-income countries that are exporting their products to the EU. Detecting whether deforestation has occurred in product place of origin can be assisted through satellite images or on-the-ground inspections, though this may not always be straightforward. Verifying the legality of production is likely to be even harder. Many producer countries have complex and layered legal systems governing land, forests, and agriculture, often involving overlapping mandates between national, regional, and local authorities and involving different levels of customary law (which may not always be documented or published) alongside statutory law. Operators and competent authorities may therefore face some difficulty in defining what constitutes "relevant law" in practice.

In particular, the rights of ownership of and access to land are sometimes not documented, leaving it unclear whether the farmer or forester who has produced the products had the legal right to do so. While the European

Commission does not require documentary proof, or even possession of a land title, per their EUDR guidance, many EU-based operators request it anyway to reduce the risk of sourcing products from illegally harvested land.

Supply chains within producer countries are also often complex, involving several intermediate steps between the farmer or forester and the company that exports it or places it on the EU market. Often local traders are involved, such as the “pisteurs” in Côte d’Ivoire, who collect cocoa beans from small farms and pass them on to larger companies further down the chain. Passing the information necessary to show compliance with the EUDR through these steps, including the geolocation data for the products’ origins, is not straightforward. This is likely to create an incentive for EU operators or their suppliers to simplify their supply chains by buying direct from farmers. Some countries, including Côte d’Ivoire, have legislation requiring exporters to purchase a minimum proportion from local suppliers through indirect supply chains.

3 Producer-country Government Responses

Source: Shutterstock

Most of the initiatives seen to date have focused on supply chain management responses to meet the EUDR's geolocation and due diligence requirements, such as the development of national or sectoral traceability systems for the products destined for export to the EU.

Many companies based in producer countries, and their governments, have begun to adopt a wide range of measures to facilitate compliance of their products with the EUDR. Most of the initiatives seen to date have focused on supply chain management responses to meet the EUDR's geolocation and due diligence requirements, such as the development of national or sectoral traceability systems for the products destined for export to the EU. However, a number of countries are introducing more far-reaching reforms that have the potential to transform forest and land governance and production practices across entire sectors or at the national level. In some cases, the development of national traceability systems has required these reforms; in other cases, they are proceeding independently. Annex 2 includes a summary of government initiatives organized by country, with full references. This section provides an overview by theme.

This report does not contain an assessment of the quality or effectiveness of the initiatives summarized here and, in many cases, they are too new for this to be feasible; many are announcements of intentions and plans rather than measures completed. While it is obviously encouraging that such a wide range of measures is being implemented, it does not automatically follow that they will be effective; for example, stakeholder consultations may not be fully inclusive, plans may not be comprehensive, and land registry processes may not be fair and equitable. Stakeholders, including donors, should pay attention to the quality of these reforms as they evolve, and they should likewise encourage these reforms to start.

3.1 LEGALITY: DEFINITIONS, CLARIFICATIONS, AND REFORMS

Given the difficulties operators and EU competent authorities may face in defining what constitutes "relevant law" in practice, some producer-country governments have begun to analyze the coherence, clarity, and enforceability of their domestic legal frameworks, leading to reform processes in some cases—the clearest example of the EUDR stimulating governance reforms.

In cocoa-producing countries in West Africa, for example, the European Forest Institute (EFI), with support from the EU, has produced analyses of the national legal frameworks relevant to cocoa production. Although these were produced independently of government, the processes involved extensive stakeholder engagement, including government, and have accelerated discussions on opportunities for legal reform where laws proved to be unclear or lacking. EFI has conducted similar preparedness checks or gap analyses for the coffee sector in Ethiopia, Kenya, and Tanzania, as well as the rubber sector in Sri Lanka, other organizations for coffee in Viet Nam, and for all commodities in Brazil. As with the cocoa studies, the analyses were published independently of government, but they included consultations with government stakeholders. In several countries, including Honduras, Nigeria, and Thailand, the various coordinating bodies for EUDR implementation include legal and regulatory reviews.

The laws identified as in need of clarification or reform include those governing the legal status of farms located in protected areas or forest reserves. While national law generally prohibits agricultural production in such areas, enforcement has often been weak or selective. In addition, national definitions of "forest" and "deforestation" may vary from those included in the EUDR. In Côte d'Ivoire's Forest Code, for instance, deforestation is only considered when it occurs in the state forest estate, while forest conversion is legal in the rural domain under certain conditions.

In October 2025, Malaysia was reported as planning to engage with the EU to clarify the status of lands possessed through native customary rights, where documentation of legal ownership does not generally exist; this was expected to be a key topic for debate within the Joint Task Force between the EU, Indonesia, and Malaysia.

In some cases, the reinforcement of legality has occurred primarily through judicial or regulatory channels, rather than field-level enforcement, such as in Brazil. Over recent years, court rulings have restricted the regularization of land that was cleared illegally, limiting the ability of producers to legalize past deforestation through administrative processes.

3.2 TRACEABILITY SYSTEMS, FOREST AND LAND MAPPING, AND TITLES AND FARMER REGISTRATION

The requirement for plot-level geolocation data is one of the most demanding features of the EUDR. For each batch of regulated commodities placed on the EU market, operators must provide the geographic coordinates of the plots of land where production occurred, enabling operators to demonstrate that production did not take place on land deforested after the cut-off date at the end of 2020, or that it breached the relevant laws of the country of origin.

Many countries are in the process of establishing national traceability systems for specific commodities, ensuring that EUDR-relevant information can be passed securely through the supply chain from farm to import to the EU, including through all the intermediate steps. Systems so far established cover cocoa in Ghana, coffee in Ethiopia, Kenya, Rwanda, Tanzania, and Uganda, rubber in Sri Lanka, timber in Costa Rica, and both cocoa and coffee in Côte d'Ivoire and Ecuador. Similar initiatives have been announced for cocoa and coffee in Liberia and for cocoa in Nigeria. Thailand has established a traceability platform for all EUDR-listed commodities.

In other cases, countries have been able to make use of existing monitoring systems. Brazil, for example, already operated satellite-based forest monitoring platforms capable of detecting deforestation at relatively high spatial and temporal resolutions. They also possessed extensive farmer and land registration systems. However, linking the deforestation information to commodity flows has proven complex; beef supply chains often involve multiple intermediaries and indirect suppliers, making it difficult to associate final products with specific production plots. A number of systems are under development, including the AgroBrasil+Sustentável Platform and the SeloVerde MG platform in the province of Minas Gerais.

Another example is Argentina's VISEC (Sectoral Vision of the Gran Chaco) platform for environmental and social sustainability and traceability in the soybean and beef sectors. Established in 2019, VISEC is a voluntary scheme with extensive coverage in the two sectors, and it has established systems to issue certificates to EUDR-compliant products, which are now required for export to the EU. In Uruguay, a major beef exporter, a comprehensive individual electronic traceability system for livestock has been in place since 2011, and similar systems for timber, soybeans, and cattle hides are under development.

While the establishment or adaptation of such traceability systems may not lead to fundamental forest and land governance reforms, the process has exposed long-standing gaps in forest data, agricultural registries, and land title and administration systems in several cases. These traceability systems will not function effectively if these gaps are not addressed. In many examples, governments lack accurate, up-to-date information on the number, size, and location of farms producing commodities. Land tenure may be informal or customary, farm boundaries poorly defined, and administrative data fragmented across agencies. In Côte d'Ivoire, for instance, spatial data on protected area boundaries are inconsistent, and a significant share of "classified forests" (which should be protected) are subject to extensive cocoa cultivation; production in these areas may may lack legal backing, but spatial information is not publicly available.

In response, governments have accelerated or initiated efforts to develop or expand national mapping programs for forests and farms and farmer identification and registration systems, in an effort to improve clarity and resolve disputes over land access and tenure.

In Cameroon, Côte d'Ivoire, and Ghana, where cocoa production is overwhelmingly smallholder-based, governments have launched some of the most ambitious mapping exercises seen to date, accompanied by farmer registration schemes. Under Ethiopia's agricultural land registration system—one of the world's largest land registration projects—coffee farmers are being issued with certificates that include geolocation data. The Indian Coffee Board has been conducting mass registration drives amongst farmers.

Viet Nam has made extensive efforts to create forest maps (including identifying planting areas at high risk of causing deforestation), collect coffee area data, and establish a coffee product traceability system. Honduras is developing its national forest cover map with base year 2020, a palm oil cover map, and cocoa cover to add to its already completed coffee map, all with base year 2020. This will strengthen its information systems for the issuance of certificates of zero deforestation. A central component of Peru's strategy to align with the EUDR is the update and formalization of the rural land cadastre, aimed at improving land tenure security, expanding access to agrarian services, and increasing producer participation in sustainable agricultural systems.

As well as facilitating compliance with the EUDR, mapping and traceability systems can bring direct benefits. In Ghana, for example, the introduction of the Ghana Cocoa Traceability System has generated more accurate information for forecasting and for avoiding disputes, such as those over land and forest boundaries and payments to cocoa farmers from Purchasing Clerks.

In some cases, national certification schemes have been promoted as facilitating compliance with the EUDR. This includes the mandatory Indonesian Sustainable Palm Oil (ISPO) and Malaysian Sustainable Palm Oil (MSPO) schemes, and the African Standard for Sustainable Cocoa (ARS-1000), currently being implemented as a mandatory requirement in Côte d'Ivoire and as a voluntary option in Ghana and Cameroon. At present, all these schemes' principles and criteria differ from those of the EUDR to a certain extent, which limits their usefulness. They do, however, offer possible foundations for future developments, especially since they are national rather than voluntary sustainability standards and their certification systems, such as those of the Forest Stewardship Council or Rainforest Alliance. Though these voluntary standards can certainly help, certification under one of the standards does not automatically guarantee compliance with the EUDR. While many of them include very similar criteria and systems to help deliver the information necessary for compliance, they operate supply-chain control systems that offer useful models on which to build broader national systems.

The ARS-1000, ISPO, and MSPO schemes all existed before the EUDR was agreed, but the EU regulation has accelerated the adoption of ARS-1000 and prompted a number of reforms to the MSPO scheme. In India, two voluntary certification systems, the Indian Forest & Wood Certification Scheme and the Indian Coffee Board Sustainability Certification Scheme, have been introduced since the EUDR's entry into force, with alignment with the EUDR one of their claimed benefits.

3.3 STRATEGIC PLANNING, COORDINATION, AND GENERAL PREPAREDNESS

Many producer countries have built measures into existing or new strategic plans for the country or commodity sectors to ensure that their products meet the EUDR criteria. This often includes establishing new bodies to coordinate action. Facilitating compliance with the EUDR is likely to involve several different government departments or agencies, including those dealing with forests, agricultural production, and commodity marketing; several countries have brought in scientific institutions to work with other government agencies in developing traceability systems. While these processes do not guarantee long-lasting reforms in forest and land governance and law enforcement, they can help facilitate them.

Examples include:

- **Honduras:** inter-institutional technical committee, including 16 state institutions, led by the National Institute for Forest Conservation and Development
- **Malaysia:** Special Committee for EUDR Implementation, including three ministries
- **Peru:** a comprehensive strategy to align with the EUDR led by the Ministry of Agrarian Development and Irrigation
- **Rwanda:** a 28-member EU Due Diligence Working Group, representing every link in Rwanda's coffee value chain, aiming to look at both the EUDR and the EU Corporate Sustainability Due Diligence Directive (CSDDD)
- **Thailand:** Ministry of Agriculture and Cooperatives' sub-committee, with working groups covering topics including forest mapping, farmer adaptation, specific commodities, and negotiations with international and foreign organisations.
- **Viet Nam:** comprehensive Action Plan Framework for EUDR Compliance.

3.4 DIALOGUE WITH STAKEHOLDERS

One of the most basic steps that producer-country governments can take in facilitating alignment with the EUDR is to establish forums for dialogue between relevant stakeholders in each sector, or across sectors, to discuss the steps needed to ensure the export of EUDR-compliant products. Although these may be one-off or short-term initiatives, they have the potential to evolve into more long-lasting multistakeholder dialogues, with implications for improved transparency over forest, land governance, and decision making.

Sometimes existing institutions may be used for this purpose, sometimes new forums established through external support. Examples include:

- **Cameroon:** National Forum on Compliance with the EU Deforestation Regulation
- **Peru:** series of regional technical workshops aimed at cocoa and coffee producers designed to develop technical skills, improve understanding of the EUDR, and gather key information for the design of sectoral actions
- **Rwanda and Uganda coffee sectors:** South–South learning exchange on best practices for EUDR compliance
- **Viet Nam:** national and regional task forces to develop technical guidelines, pilot solutions, and organize dialogue

4 Conclusions: The Impacts of the EUDR

The examples summarized above illustrate the very wide range of measures being adopted by producer-country governments (more detail in Annex 2).

As noted above, it is not possible to evaluate the impact of most of these initiatives yet, as many of them are still in the process of development and implementation; many were initiated in 2025, often in the second half of the year. Part of the explanation for this delay in action since the EUDR came into force may be the relative lack of capacity-building support initially available from the EU (at least compared to the frameworks put in place through the Voluntary Partnership Agreements aimed at trade in illegal timber under the EU's Forest Law Enforcement, Governance and Trade (FLEGT) initiative launched in 2003). Some support was always available for West African cocoa producers under the EU's Sustainable Cocoa Initiative, and more is now being provided across other sectors through the Team Europe Initiative involving the European Commission and EU member states; many of the initiatives described in Annex 2 are now being undertaken with EU or EU member-state support.

Source: Shutterstock

The range of measures summarized here conclusively demonstrates the impact that the EU's Regulation on Deforestation-free Products has had so far, and the potential for encouraging much greater and more far-reaching reforms in the future.

This makes it more likely that the systems will be partly or fully in place by the time the EUDR enters fully into application at the end of 2026, though the repeated delays in the EUDR also threatens the position of those countries which have invested most heavily in preparations. Viet Nam is the best example, where in October 2025, a number of coffee-exporting companies observed that if the EU decided to delay the EUDR again (which it then did) this would harm Viet Nam's first-mover advantage in the European market. If the EUDR is delayed yet again, after the European Commission's review is completed in April 2026, this will undercut early movers even further and encourage those countries that have not yet taken any measures to continue to avoid action. The ultimate result would be to undermine the credibility of the EUDR and the EU's commitments to tackle global deforestation.

This scenario will hopefully be avoided, as it is clear that the approach of the EUDR has triggered, or at least accelerated, the introduction of a wide range of measures. In July 2025, for example, the Ministry of Agriculture in Kenya warned that the country was in danger of losing 90 billion Kenyan Shilling (about US$700 million) in coffee exports if it was not ready in time. Similarly, at the launch of Nigeria's National Strategy for EUDR Compliance in November 2025, the minister warned that his country stood to lose over US$1 billion in direct export earnings and more than US$3 billion in total economic value each year if its agricultural commodities failed to meet the EU's new standards.

In September 2025, the Director General of the Tanzania Coffee Board commented how the EUDR "has given us the market push to build [the farmer registry] properly and to collect crucial new data needed to provide extension services to our coffee farmers, such as farm geolocation information." In Viet Nam, according to the Director of the Institute for Agricultural and Environmental Policy and Strategy, the EUDR has helped to act as a “driving force for green transition and long-term sustainable agricultural development.” In Costa Rica, the incentive of EUDR compliance appears to have accelerated the implementation of the government’s Sustainable Agrolandscapes Initiative.

Unsurprisingly, most of the examples described here affect the cocoa and coffee sectors, the two commodities included in the EUDR in which the EU accounts for the largest share of global markets. In Peru, for example, the EU accounts for 48 percent of the country’s coffee exports and 30 percent of its cocoa exports. However, the EU can also be important for other commodities, such as rubber exports from Sri Lanka, 30-35 percent of which are affected by the EUDR. The incentive to comply with the EUDR is accordingly higher in these sectors and these countries.

It is also clear that the EUDR is affecting consumer countries outside the EU, or at least that some producer countries perceive this to be the case. At the launch of Liberia’s proposed National Agriculture Traceability System Roadmap, the agency’s Acting Director explained that “many people misunderstand the intent of EUDR. It is not just a European requirement; it is a global requirement [...] In my recent meeting with the Chinese Embassy, as we seek to place our products on the Chinese market, EUDR was mentioned. This tells us that it is not targeted at one locality [...] If EUDR is not addressed, we as legislators, government officials, and technicians risk a situation where over 30 percent of our farmers’ products will grow and die on the farms without access to markets.”

Even Indonesia, one of the countries most critical of the perceived imposition of external standards on exports, has taken action to respond to the EUDR. In June 2024, the government announced its intention to establish a National Sustainable Commodity Dashboard to increase supply chain transparency and promote sustainability standards. In September 2025, a representative of the Joint Task Force established to design the system stated that, ”This is not just about the EUDR [...] we are addressing all global regulations that now demand traceability and sustainability for the commodities we export worldwide.”

These are still early days in producer-country governments adoption of measures to assist their producers to comply with the EUDR. The range of measures summarized here—and they are accompanied by a much wider spread of initiatives pursued by the private sector independently of government—conclusively demonstrates the impact that the EU Deforestation Regulation (EUDR) has had so far, and the potential for encouraging much greater and far-reaching reforms in the future.

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ANNEX 1

BACKGROUND: THE EUDR

The EUDR was agreed and entered into force in June 2023. It was originally due to enter fully into application at the end of 2024 (for most companies; small companies and micro-enterprises were given an additional six months). In October 2024, in the face of mounting concerns about companies' ability to comply (stemming mainly from businesses within the EU), application was delayed until the end of 2025. Several proposals for much more significant amendments were put forward by members of the European Parliament at the time (the Parliament's political composition had shifted to a right-wing majority after the election of June 2024), but they were resisted by the Council (the representatives of EU member states' governments).

In October 2025, the European Commission published a second proposal for a delay in application, this time through the implementation of a "grace period" of six months to the end of June 2026, during which the regulation would in effect not be enforced (small companies and micro-enterprises were given an additional six months for application, until the end of 2026). The reason the European Commission gave was that the IT system needed for companies to input their information on products (see below) would not be ready in time. This triggered another round of proposals for delays and so-called "simplification" measures, some of which were adopted. In the end, the proposal for a grace period was dropped, and another year-long delay was agreed. The EUDR is now scheduled to enter fully into application on 30 December 2026 for large and medium-sized companies, and 30 June 2027 for small companies and micro-enterprises, except those in the timber sector.

The European Commission will also be required to conduct a "simplification review" of the regulation, with particular regard to its impact on micro and small operators, by the end of April 2026. Although it is not required to come forward with further amendments to the legislation, it is likely to come under pressure to do so. The description of the regulation below represents the text as agreed in December 2025, but this may not be its final form.

Due Diligence Obligations

The core aim of the EUDR is to ensure that a designated list of forest-risk commodities and products placed on the EU market, or exported from the EU, satisfy two criteria. They must be:

- **Deforestation-free**, meaning they must have been grown or made from commodities that were produced on land that had not been subject to deforestation after 2020. For wood products, wood harvested after 2020 must have been without inducing forest degradation.
- **Produced legally**, which means in accordance with the laws applicable in the country of origin concerning the legal status of the area of production in terms of land use rights, environmental protection, forest-related rules, third parties' rights, labour rights, human rights protected under international law, the principle of free, prior and informed consent, and tax, anti-corruption, trade and customs regulations.

The companies first placing the products on the EU market, or exporting them from the ("operators") are required to exercise "due diligence" to avoid placing or exporting non-compliant products. This due diligence process involves three steps:

- The collection of information about the products in order to demonstrate that they satisfy the deforestation-free and legality criteria; this includes geolocation data for their place of origin (defined by latitude and longitude coordinates, or, for farms larger than 4 hectares, as polygon maps of the perimeters).
- An assessment of the risk that the products may not be compliant, including consideration of the risk level of the origin, determined by the benchmarking process (see below), the presence of and consultation with indigenous peoples and any claims over land ownership they may have, the degree of reliability of the documentation on the products' origins, the complexity of the supply chain, the risk of circumvention or mixing with products of unknown origin and any history of non-compliance by companies in the supply chain.
- Measures to mitigate risk where the assessment shows a higher than negligible level of risk of non-compliance. This may include supporting the company's suppliers, particularly smallholder farmers, through capacity building and investments.

Operators are obliged to submit a "due diligence statement" before their products are placed on the EU market or exported from the EU, stating that the products, and the commodities from which they were made, meet the deforestation-free and legality criteria, or at least that there is a negligible risk of them not doing so. The statement must also contain information about the source of the products, including the geolocation coordinates of their origins.

In the EUDR's original form, large companies (larger than Small and Medium-sized Enterprises (SMEs)) further down the supply chain were placed under the same obligations as the "first place" operators, including carrying out due diligence and filing due diligence statements. As a result of the changes in late 2025, however, these obligations have been largely removed. All these companies now have to do is register in the Information System (the system through which operators file due diligence statements) and collect the reference numbers of the due diligence statements filed by the operators from which they buy the products (these are similar to the obligations possessed by SMEs further down the supply chain under the original EUDR). This includes "traders" (companies that buy and sell EUDR-listed products but do not transform them into other products) and "downstream operators" (companies that buy EUDR-listed products that have already been placed on the EU market (e.g., cocoa beans) and transform them into other products also listed (e.g., chocolate).

In addition, a new category of company was established by the 2025 amendments: "micro and small primary operators," which are micro- or small-sized enterprises established in a country classified as low risk under the benchmarking system (see below) and which place EUDR-listed products directly on the EU market themselves. These companies are obliged only to submit a one-time simplified declaration to the Information System instead of due diligence statements. This benefits small EU producers such as small forest-owners; it is unlikely to be of any value to similar sized companies outside the EU (cocoa or coffee smallholder farmers, for example), who almost always sell their products to larger companies to import into the EU rather than placing them directly on the EU market.

Benchmarking and Enforcement

The EUDR prescribes a "benchmarking system" placing producer countries, or parts of them, in three tiers of risk: high, standard, and low. The risk level is based primarily on an assessment of the rate of deforestation and the rate of expansion of agricultural land and the production trends of relevant commodities and products in the country, though a range of other factors can also be taken into account. In May 2025, the Commission published the methodology and first categorization, which included only four high-risk countries (Belarus, Democratic People's Republic of Korea, Myanmar, and Russian Federation—all countries operating under EU and/or UN sanctions) and 141 low-risk countries; all other countries are standard-risk. The list will be kept under review and updated in light of new evidence.

Operators sourcing products from low-risk countries, and where there is a negligible risk of mixing with products of other origins, will be subject to a simplified due diligence procedure, which includes only the information collection requirements, and not the risk analysis or mitigation steps. Companies sourcing products from high-risk countries will not face different obligations from those sourcing from standard-risk origins, but they will be subject to an increased frequency of checks by EU member states' enforcement agencies ("competent authorities"). Of course, operators should not be importing any of these commodities directly from the four countries identified so far as high-risk, because of sanctions, but products made from raw materials from these sources and manufactured in other countries not applying the sanctions, such as wooden chairs made in China from Russian timber, could still be imported into the EU.

The regulation specifies the minimum levels of checks the authorities must carry out each year, in terms of minimum percentages of the numbers of operators placing on the market or exporting each commodity: nine percent of operators sourcing from high-risk countries, three percent from standard risk, and one percent for low risk. For high-risk sources, the checks must also cover at least nine percent of the quantity of the relevant products.

Suppliers in the countries of product's origin have no direct obligations under the EUDR; it is only companies with a presence in the EU that are subject to its requirements. However, as part of their commercial relationships, the supplying company must be able to collect and pass on the information necessary to enable the EU-based operator to place their products on the EU market: evidence that the products have been produced in compliance with the EUDR (i.e., that they are legal and deforestation free), and information on their origin, including the geolocation data for the place of harvesting. Accordingly, many companies based in producer countries, and their governments, have begun to adopt a wide range of measures designed to improve the chances of their products complying with the EUDR.

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ANNEX 2

PRODUCER-COUNTRY GOVERNMENT RESPONSES

A2.1 Africa

In July 2025, **Cameroon**, an important cocoa producer, held a meeting of its National Forum on Compliance with the EU Deforestation Regulation, jointly organized by the Interprofessional Council of Cocoa and Coffee (CICC) and the Ministry of Trade, and attended by international partners and leading cocoa exporters. (GIZ 2025; Business in Cameroon 2025).

Farmer registration and cocoa plot mapping is being undertaken by the cocoa industry (EFI 2025a). The CICC, with funding from cocoa export levies, is establishing a database of cocoa farmers and geolocation information, with the objective of covering about 40 percent of producers by the end of 2025; the total eventual cost of 100 percent coverage is estimated at about €15 million. The government's claim, in July 2025, that 99 percent of Cameroon's cocoa and coffee growing regions were already covered by geolocation and traceability systems seems at odds with EFI's estimate that about 50 percent of the cocoa volume traded is geolocated, as it is certified either by voluntary or industry schemes (Business in Cameroon 2025).

Also in July 2025, the CICC announced the establishment of GeoShare, a digital platform designed to pool geolocation data of cocoa and coffee farms contributed by six major exporting companies; smaller exporters, and EU buyers, will be able to access the data to verify the origin of their products (GIZ 2025).

In 2025, the government, with EU support, published practical support tools for due diligence on the legality of cocoa under the EUDR; Module 1 details national legal requirements, while Module 2 provides risk-based recommendations for compliance verification (Republic of Cameroon 2025). These are based largely on an analysis of Cameroon's national legislative framework produced by the European Forest Institute (EFI) (EFI 2025a) Although this was produced independently of government, the process involved extensive stakeholder engagement and stimulated discussions on opportunities for legal reform where laws proved to be unclear or lacking (EFI 2025b).

In **Côte d'Ivoire**, the world's largest cocoa producer, legislation to establish a unified, mandatory national traceability system for cocoa, and coffee, was passed in September 2023 (EFI 2025c). The system is based on the registration of all farmers, the allocation of individual registration numbers and cards to farmers, and the labelling of cocoa or coffee bags at the first point of purchase. At each stage, digitized information on farmers, financial transactions, and the supply chain is recorded. By the end of 2024, the vast majority of farmers had been issued with registration cards.

The roll-out of the national traceability system, integrating cooperatives and buyers, is under way, supported by the implementation of the African Standard for Sustainable Cocoa (ARS-1000) (currently being implemented as a mandatory requirement), which requires cocoa plot polygons. The main challenges include ensuring the interoperability of data between public and private systems (in 2024, the exporters' group GEPEX began consolidating its members' databases to enable the government to identify farmers who were not in its own database); verifying the accuracy of the data recorded; and integrating information on the sustainability of cocoa from other national tools, such as the 2020 land-use map or the Child Labour Monitoring and Tracking System. The country is setting up a national forest monitoring and deforestation alert system.

Challenges also remain with definitions in national legislation. In Côte d'Ivoire's Forest Code, deforestation is only considered when it occurs in the state forest estate, while forest conversion is legal in the rural domain under certain conditions (EFI 2025c). The African Standard for Sustainable Cocoa also permits harvesting in secondary forests under some circumstances, which is not consistent with the EUDR. Ensuring that cocoa sourced is legal requires access to accurate spatial data on protected area boundaries; yet in Côte d'Ivoire, those datasets that are available are inconsistent. In addition, a significant share of "classified forests" are subject to extensive cocoa cultivation; they may lack legal backing, and spatial information is not publicly available. As in Cameroon, EFI has produced an analysis of the national legal framework relevant to cocoa production (EFI 2025c), and engaged stakeholders extensively in the process, encouraging discussions over potential legal reforms (EFI 2025b).

Ethiopia has incorporated alignment with international standards such as the EUDR into its 15-year Coffee Development Strategy (USDA 2025a). In August 2025, the Ministry of Finance and Ethiopian Coffee and Tea Authority (ECTA) convened a meeting of representatives from government agencies, development partners, coffee farmers' cooperatives and unions, exporters and coffee buyers' associations to discuss progress towards alignment with the EUDR (ENA 2025).

ECTA has built on its existing Market Information Management System (MIMS), first established in 2022, to track the movement of coffee beans from the primary coffee transaction posts at the district level to export (EFI 2025d). Under stage two of the country's agricultural land registration system—amongst the world's largest land registration projects—farmers are being issued with certificates including geolocation data. By 2025, the Ministry of Agriculture had issued certificates for 31 million out of an estimated 50 million plots, the vast majority of which are included in the digital information system managed by the government. Over the next five years, the Ministry intends to complete the issuance of certificates development of the land database and data-sharing policies.

In **Ghana**, the Ghana Cocoa Board (COCOBOD), which is responsible for promoting and regulating the country's cocoa industry, is developing a digitized Cocoa Management System, an integrated system including several modules, such as traceability and purchasing, farm and farmer information, input distribution, quality control, the farmer pension scheme, and information on Licensed Buying Companies and Purchasing Clerks (EFI 2025e). As part of the Cocoa Management System, the Ghana Cocoa Traceability System (GCTS) aims to provide full digitized physical and financial traceability from farm to the point of export. The system captures cocoa transactions through the supply chain in real time using a tagging system (a QR code embossed on a tag and fixed on the cocoa bag). The Cocoa Management System also enables COCOBOD to manage farmer information, and in 2025 it completed a national cocoa farmers' registration exercise and mapping of cocoa farms, including GPS coordinates; farmers are registered with unique IDs. The GCTS was largely completed by August 2025, in time for the first week of the 2025–26 main crop season (Cocoa Radar 2025).

Like Côte d'Ivoire, Ghana is also introducing the African Standard for Sustainable Cocoa as a voluntary system to start. As well as facilitating compliance with the EUDR, the mapping and traceability systems have already brought direct benefits to cocoa farmers in the form of more accurate information for forecasting and the avoidance of disputes over land and forest boundaries and payments from Purchasing Clerks (B&FT Online 2025). In 2025, the government, in partnership with Cameroon, with EU support, published practical support tools for due diligence on the legality of cocoa under the EUDR (EFI 2025f). This was based largely on EFI's analysis of the national legislative framework (EFI 2025e) and, as in Cameroon and Cote d'Ivoire, the process of stakeholder engagement helped stimulate discussions over potential legal reforms (EFI 2025b).

In 2024, **Kenya** established an Inter-Ministerial Committee on Implementation of the EUDR to develop and implement a roadmap towards EUDR compliance, including sub-committees on data, legality and strategic communication (EFI 2025g). Its legal sub-committee has developed a matrix of laws governing the coffee value chain. The EFI analysis of this work, published in January 2025, regarded it as a good first step, but recommended further development to make it more comprehensive and to include sections on verification of compliance and compliance issues; it also recommended broader multistakeholder input. In July 2025, the Ministry of Agriculture warned that the country was in danger of losing 90 billion Kenyan shilling (about US$700 million) in coffee exports if it was not ready in time (Kenyans.co.ke 2025).

The Directorate of Resource Surveys & Remote Sensing is leading a geo-mapping project, together with the Kenya Forest Service, the Kenya Space Agency, and the Agriculture and Food Authority (EFI 2025g). The project aims to geolocate all coffee plots in Kenya and integrate farmers' data with remote sensing data, with the target of completing all mapping by the end of 2025, followed by field verification; between July and September 2025, 30 per cent of coffee-growing areas were mapped (Kenya News Agency 2025). The country already possessed a mandatory coffee traceability system built around unique codes given to dry mills; the coffee beans could be traced back to wet mills (where the beans are washed), but not always back to individual farmers. There is currently no nationwide registry of growers and farmers.

In September 2025, the **Liberia** Agriculture Commodity Regulatory Authority (LACRA) organized a one-day stakeholder engagement event with coffee and cocoa exporters, leading to the establishment of a committee comprising heads of major exporting firms to consider the set-up of a national traceability platform (Front Page Africa 2025). It also announced its plans to establish a national traceability system for the country's cocoa and coffee sectors. The country's Roadmap to a Sustainable Cocoa Sector includes a commitment to 100 percent traceability from farm to point of export by 2026; limited progress has been made since this was agreed in 2021 (EFI 2025h).

The new National Traceability Steering Committee met in January 2026, representatives from LACRA, the Forestry Development Authority, the Cooperative Development Agency, farmers' groups, parliamentary committees on agriculture, the International Fund for Agricultural Development, International Finance Corporation, and the UN Industrial Development Organization (UNIDO) (Front Page Africa 2026). At the launch of the proposed National Agriculture Traceability System Roadmap, LACRA's Acting Director stressed the urgent need to address challenges associated with EUDR, describing it as Liberia's "next nightmare," if not properly managed. "Many people misunderstand the intent of EUDR. It is not just a European requirement; it is a global requirement," he explained. "In my recent meeting with the Chinese Embassy, as we seek to place our products on the Chinese market, EUDR was mentioned. This tells us that it is not targeted at one locality [...] If EUDR is not addressed, we as legislators, government officials, and technicians risk a situation where over 30 percent of our farmers' products will grow and die on the farms without access to markets."

In **Nigeria**, a consultative meeting of the National EUDR Taskforce was held in September 2025, including representatives of the Federal Ministry of Agriculture and Food Security, the National Cocoa Management Committee, cocoa exporters, farmers' cooperatives, compliance service providers, donor agencies, and international development partners (Von 2025). Organized by the Food and Agriculture Organization of the United Nations (FAO), the meeting identified seven key topics: good agricultural practice assessments, polygon mapping and traceability, development of a national cocoa database, stakeholder capacity building, the use of GIS tools for deforestation analytics, legal and regulatory reviews, and improved logistics and institutional coordination.

In November 2025, a memorandum of understanding was signed between the Ministry of Agriculture and Food Security and the National Space Research and Development Agency, with the aim of establishing a national traceability and environmental monitoring system. At the same, time the government launched a White Paper on Nigeria's National Strategy for EUDR Compliance (Tribune Online 2025). At the launch, the Minister warned that Nigeria stood to lose over US$1 billion in direct export earnings and more than US$3 billion in total economic value each year if its agricultural commodities failed to meet the EU's new standards.

In February 2026, the Cross River state government announced the launch of its traceability program for cocoa, coffee, and palm oil (The Sun 2026). The program involves farm mapping, geolocation of production areas, registration of farmers and value chain actors, and secure data management.

Rwanda has established a 28-member EU Due Diligence Working Group, representing every link in the country's coffee value chain. As well as the EUDR, it aims to consider the EU Corporate Sustainability Due Diligence Directive (CSDDD), which will require large EU-based companies to adopt a broader approach to human rights and environmental due diligence when it is transposed into EU member-state legislation (UNDP 2025). In November 2025, the National Agricultural Export Development Board announced a digital "Smart System" to track coffee from farm to export. The tool is designed to collect data on production, inputs, and farm management practices. A nationwide coffee census was also under way to gather geospatial data and socioeconomic profiles of farmers (New Times 2025).

Tanzania began the development of a National Coffee Registry in September 2024, along with a coffee profiling app developed to collect farmer and farm data, including EUDR-relevant information such as farmer geolocation, deforestation-free status, and other legality aspects (The Citizen 2024; EU Delegation to Tanzania 2025). Building on an existing app for fertilizer subsidies, it has undergone field testing and improvements to ensure accuracy and reliability. Data collected is validated before being stored in the National Farmer Registry, after which a farmer card is issued. The existing traceability system for coffee only allows traceability back to the Agricultural Marketing and Cooperative Societies (AMCOs), but each of these buys coffee beans from a relatively small and stable group of coffee farmers, allowing a reasonable level of traceability for EUDR purposes. (EFI 2025i.)

In September 2025, the Tanzania Coffee Board and the EU Delegation jointly convened a two-day event bringing together 40 coffee exporters, alongside representatives from eight government agencies and ministries and technical partners (EU Delegation to Tanzania 2025). Through information sharing, dialogue, and practical demonstrations, participants explored systems and tools to help exporters enhance due diligence, improve data collection, and ensure Tanzanian coffee remains competitive and compliant in the European market. The Tanzania Coffee Board Director General commented how the EUDR "has given us the market push to build it [the farmer registry] properly and to collect crucial new data needed to provide extension services to our coffee farmers, such as farm geolocation information."

Uganda has established a National EUDR Task Force, aiming to deliver capacity-building program, awareness campaigns, and partnerships with key stakeholders in the coffee sector (PML Daily 2024). Similarly to Rwanda, it is also working on compliance with the forthcoming EU CSDDD, which is expected to affect the widespread use of child labor in coffee farming (IPS 2024). In 2024, the Uganda Coffee Development Authority began a program of registering coffee farmers with geolocation information; by September 2025, 1.5 million farmers across 126 districts had been mapped (EU 2025). It also launched a national traceability system for coffee, with the aim of issuing due diligence certificates to exporters of coffee to the European market by mid-October 2025 (New Vision 2025). The government made a point of reassuring farmers that the digital registration system was not intended for taxation but to meet the requirements of the EU, one of the country's largest export markets (Monitor 2025).

Some cross-border collaboration has also taken place. In July 2025, representatives of the coffee sectors in **Rwanda** and **Uganda** met for a South–South learning exchange on best practices for EUDR compliance; discussions covered the development of national frameworks for meeting due diligence requirements, the role of public–private commitments, and strategies for effective communication, and awareness raising throughout the value chain (UNDP 2025).

A2.2 Asia

In December 2023, **India** launched the Indian Forest & Wood Certification Scheme, offering voluntary third-party certification aimed to promote sustainable forest management and agroforestry. In February 2026, the CEO of the scheme, which is overseen by the Indian Institute of Forest Management, claimed that the scheme was well-positioned to support exporters in demonstrating compliance (Pulp and Paper Times 2026). "Indian businesses must adopt more stringent, transparent sourcing practices and demonstrate that their supply chains are deforestation free," he observed. "While this may seem like a regulatory burden, it is actually a valuable opportunity for Indian industries to raise their sustainability standards and strengthen their credibility in global markets. Indian industries must seize this opportunity to transform what could be seen as a trade barrier into a competitive advantage. Compliance with the EUDR is essential for accessing premium international markets, especially in Europe, where ethical sourcing is a top priority for buyers and consumers."

In November 2025, the India Coffee Board launched the voluntary Indian Coffee Board Sustainability Certification Scheme (INDICOFS) and the India Coffee App, including an integrated EUDR compliance module, enabling farmers to upload documents and geo-coordinates directly (The Times of India 2025; onmanorama 2025). The Coffee Board was also conducting mass registration drives among farmers.

As noted, not all governments have responded to the legality dimension of the EUDR by announcing new measures. Some have instead emphasised the adequacy of their existing legal frameworks and governance systems, arguing that these should be recognized as equivalent to EUDR requirements. **Indonesia** has been particularly vocal in this regard: government representatives have highlighted national forest governance reforms, licensing systems, and moratoriums on new forest conversion permits, arguing that these measures demonstrate a strong legal basis for sustainable production. This includes the timber legality verification and export licensing systems established under the country's Voluntary Partnership Agreement with the EU; any licensed timber exports are automatically assumed to be in compliance with the EUDR's legality requirement (though not the zero-deforestation criterion). In June 2023, the European Commission announced the establishment of a Joint Task Force with Indonesia and Malaysia to discuss implementation issues around the EUDR (European Commission 2023). The Task Force held its third meeting in October 2024, but no further meetings appear to have been held since.

Nevertheless, the country has taken steps to align its systems more closely with the EUDR. In February 2026, the Ministry of Forestry announced a series of reforms to the timber legality system (SVLK), including its extension to a wider range of sustainability criteria (SVLK+). (RRI 2026.) In June 2024, the government announced its intention to establish a National Sustainable Commodity Dashboard to increase supply chain transparency and promote sustainability standards (Reuters 2024). A Joint Task Force of relevant ministries was established to design a system containing geolocation data, legal documents, and transaction histories for export products, including cacoa, coffee, palm oil, rubber and timber. "This is not just about the EUDR," said a Task Force representative in September 2025. “We are addressing all global regulations that now demand traceability and sustainability for the commodities we export worldwide” (Palm Oil Magazine 2025).

The Indonesian Sustainable Palm Oil (ISPO) scheme was introduced in 2011 for plantations. It was extended to smallholders in 2015, and became mandatory for them in November 2025. Implementation has been slow. By May 2025, it covered less than 40 percent of the country’s production area, including only a handful of smallholders (GAPKI 2025). A new ISPO regulation enacted in March 2025 extended certification to plantation businesses and downstream industries, but technical implementation guidance has yet to be published.

In June 2025, **Malaysia** established a Special Committee for EUDR Implementation, involving the Ministries of Plantation and Commodities, Natural Resources and Environmental Sustainability, and Investment, Trade and Industry, to align policies, technical implementation, and data readiness to comply with the EUDR’s requirements, and to engage with the EU (Ministry of Plantation and Commodities Malaysia 2025). A key priority of the Committee is to change Malaysia’s classification from standard risk to low risk under the EUDR benchmarking process. In October 2025, the country was reported as planning to engage with the EU to clarify the status of lands possessed through native customary rights, where documentation of legal ownership does not generally exist (though in fact the guidance on implementation of the EUDR published by the European Commission makes it clear that documentary proof is not necessary) (Sarawak Tribune 2025). As noted above, Malaysia is part of the Joint Task Force with the EU and Indonesia.

Like Indonesia, Malaysia possesses its own national certification system for palm oil. Introduced in 2015, the Malaysian Sustainable Palm Oil (MSPO) scheme became mandatory in 2020 for smallholders, plantations, and processing facilities and aims to deliver 100 percent traceability to the farm level by 2025. By February 2026, about 90 percent of plantations and 85 percent of independent smallholders had been certified (The Edge 2026). In 2024, MSPO published a gap assessment with EFI of the scheme against the requirements of the EUDR. It concluded that while the scheme “contains much information that could be relevant for EU operators,” a number of critical gaps remained, and it included recommendations to close them (MSPO and EFI 2024).

In **Sri Lanka** in August 2025, the Cabinet approved a proposal for the creation of a digital system for mapping and registering rubber-producing lands held by smallholders, and priority is being given to smallholder producers with clear legal titles (EFI 2025j). The work is being carried out by the Survey Department of Sri Lanka and the Rubber Development Department through a hybrid process involving community consultations and, where necessary, manual collection of coordinates. Rubber dealers are already supposed to collect information on the producers they buy from and on the rubber they export, providing the basis for a more comprehensive traceability system. The Forest Department is updating the latest forest map (for 2015) to 2020, with the aim of completing it by the end of 2025.

In **Thailand** in April 2025, the Ministry of Agriculture and Cooperatives established a sub-committee to drive the implementation of the EUDR, with working groups covering topics including forest mapping, promoting adaptation of farmers, specific commodities and negotiations with international and foreign organisations (Bangkok Biz News 2025). In 2025, the Agricultural Research Development Agency (ARDA), together with nine public and private organisations, organized the event “Kick-off to upgrade Thai agricultural products and products to support the EUDR regulations” (MGR Online 2025). Research projects were proposed on traceability systems, geolocation, data storage, the submission of due diligence statements through the EU system, the Thai legal framework, the attitude of partner countries in ASEAN, and awareness-raising amongst farmers. In January 2026, ARDA launched the national traceability platform covering all EUDR-listed commodities (Prachachat 2026).

Also in April 2025, the National Land Policy Commission signed a cooperation agreement with the National Science and Technology Development Agency to research and develop technology to enable the certification of areas as deforestation-free (Thansettakij 2025). Farm data was being registered through the Geoplots Digital Agricultural Plot Database, covering an anticipated 444,000 farmers by September 2025 (Thailand Plus 2025).

Viet Nam has been one of the most active producer countries in preparing for the EUDR, creating its Action Plan Framework for EUDR Compliance as early as July 2023 (EU MSP 2024a). This included the establishment of taskforces, both at national and local levels, to develop technical guidelines, pilot solutions, and organize dialogue, with both industry (which were included in the task forces) and the EU. National task forces included groups on coffee, timber, and forest data in two major crop-producing provinces. No fewer than 11 conferences or technical meetings were organized with stakeholders between March 2022 and September 2024, to share information on the EUDR and discuss compliance solutions. Technical guidelines have been produced for coffee, wood, and rubber, to help companies meet the requirements for GPS/polygon positioning and traceability down to each land plot (Vietnam.vn 2025a).

The Ministry of Agriculture and Environment, the Plant Production and Protection Department, local provincial authorities and coffee businesses are working together to meet EUDR requirements, including creating forest maps (including identifying planting areas at high risk of causing deforestation), collecting coffee area data and establishing a coffee product traceability system (USDA 2025b; Vietnam.vn 2025b). Exporting businesses themselves are implementing traceability systems, adding an estimated US$40–60 per tonne (about 0.9 percent) to the total price (Vinanet 2025).

In February 2026, it was reported that provincial-level forest boundary databases and maps were required to be published by the end of 2026 (meeting the new deadline for EUDR implementation agreed in late 2025), including identifying and publishing areas for coffee, rubber, and timber production at risk of deforestation and forest degradation (Vietnam.vn 2026). The Department of Forestry and Forest Protection was planning to develop a set of indicators and forest monitoring guidelines, enabling companies to demonstrate compliance with the EUDR and an integrated technology platform combining EUDR-based traceability data with data on planting area codes and sustainable forest management certification; developing a technical guide for tracing the origin and geographical indications of forest products to demonstrate compliance.

According to the Director of the Institute for Agricultural and Environmental Policy and Strategy, the EUDR has helped to act as a “driving force for green transition and long-term sustainable agricultural development” (Vietnam.vn 2025a). This level of preparedness, coupled with the country’s designation as low risk under the benchmarking process, led a number of coffee-exporting companies to observe in October 2025 that if the EU decided to delay the EUDR again—which it did—it would harm Viet Nam’s first-mover advantage in the European market (Vinanet 2025).

A2.3 Europe

In **Ukraine**, a working group, including representatives of the Ministry of the Environment, the relevant parliamentary committee, the state-owned enterprise Forests of Ukraine, other public organizations, scientific institutions and other stakeholders, has been established to develop a new Forest Code in line with the EUDR, and with EU legislation more broadly (Interfax 2025). In March 2025, the government claimed that the country was 98–99 percent ready for EUDR standards, partly thanks to the replacement of a paper-based permit system for logging with a digital one (Business Information Network 2025). This claim, however, seems unlikely given widespread reports of illegal logging in recent years, including an analysis suggesting a 30 percent increase in illegal logging between 2023 and 2024 (ForestCom 2025).

A2.4 Latin America

The Network of Experts in Agri-Food Trade in **Latin America and the Caribbean** (RECA), an initiative led by the Inter-American Development Bank, FAO, and the Inter-American Institute for Cooperation on Agriculture, was established in 2023 to provide a neutral and independent space for the exchange of knowledge and experiences related to agri-food trade. In May 2025, RECA published a report analyzing best practices, capacity gaps, and priority actions needed for effective compliance with the EUDR in selected supply chains in 12 Latin American and Caribbean countries (Soto 2025). It also proposed a methodology for an institutional diagnosis of the degree of preparedness of the public and private sectors to comply with the EUDR.

In a number of countries, pre-existing monitoring systems are being adapted to the requirements of the EUDR. A good example is **Argentina**'s VISEC (Sectoral Vision of the Gran Chaco) platform for environmental and social sustainability and traceability in the soybean and beef sectors (VISEC n.d.) Established in 2019, VISEC is a voluntary scheme but has extensive coverage within the two sectors. It was established by the industry itself, but has support from civil society and has reached cooperation agreements with national and regional government, including customs. It receives financial support from the International Land Innovation Fund and the AL-INVEST Verde program, which is funded by the EU. It has now established systems to issue certificates to EUDR-compliant products, which are required for export to the EU.

Another example of a country integrating existing systems is **Brazil**, which already operated satellite-based forest monitoring platforms, capable of detecting deforestation at relatively high spatial and temporal resolutions. It also possessed extensive farmer and land registration systems. However, linking the deforestation information to commodity flows has often proven complex; beef supply chains often involve multiple intermediaries and indirect suppliers, making it difficult to associate final products with specific production plots. The AgroBrasil+Sustentável Platform, led by the public sector, is being developed with the primary objective of integrating existing public databases and systems, forming a large data source so that Brazilian export products meet the highest level of socio-environmental criteria, including those of the EUDR, in international markets (AgroBrasil n.d.).

Four dry runs of the implementation of EUDR requirements for soy and cattle products, carried out by Proforest with support from the EU, led to a number of recommendations for improvements in traceability and monitoring systems (Proforest 2025). In June 2025, analysis suggested that over 97 percent of soybeans produced in Mato Grosso, Brazil's largest soy-producing state, was in compliance with EUDR requirements; the three percent flagged as non-compliant was primarily because of post-2020 forest clearance (MosaicX 2025).

In Minas Gerais, the SeloVerde MG platform was jointly developed by the regional government, the State Institute of Forests, a local university and the coffee producers' association, with support from the EU. The platform also covers soybeans, cattle, sugarcane, and forestry products (AL-INVEST Verde 2024). The system analyzes data from Brazil's Rural Environmental Registry (CAR) and forest monitoring programs (SeloVerde MG n.d.).

Judicial decisions have also contributed to the improvement of forest governance. Over recent years, court rulings have restricted the regularisation of land that was cleared illegally, limiting the ability of producers to legalize past deforestation through administrative processes.

Costa Rica is creating a National Forest Traceability System as part of a wider national strategy to strengthen forest legality and reduce the risk of illegal timber trade (Tico Times 2025). The incentive of EUDR compliance also appears to have accelerated the implementation of the government's Sustainable Agrolandscapes Initiative (Delfino 2025).

In April 2025, **Ecuador** launched its Single Operator Registration System (SURO) to register and record geolocation data for cocoa and other farms (Ecuador 221 2025). By September, it was reported that more than 100,000 cocoa and coffee producers would be registered by the end of 2025, entitling them to free access to end-2020 deforestation reports and agricultural land-use maps (EuroEFE 2025).

In **Guatemala** in April 2025, a German government development program co-financed by the EU coordinated an exchange between actors in the public and private sector in the coffee, cocoa, palm oil, and sugar cane value chains (Revista E&N 2025).

Honduras is developing its national forest cover map with base year 2020, a palm oil cover map, and a cocoa cover map to add to its already completed coffee map (all with base year 2020), strengthening its information systems for the issuance of certificates of zero deforestation (Canal Ocho 2025). In July 2024, the country established an inter-institutional technical committee, including 16 state institutions led by the National Institute for Forest Conservation and Development, to facilitate the adaptation of exporting sectors to the EUDR (La Tribuna 2025; Canal Ocho 2025). In 2025, it conducted a detailed analysis of national laws, taking as a reference the legal categories established in the EUDR (La Tribuna 2025). This enabled the export of the first container of deforestation-free coffee to the EU market in May 2025.

In **Peru**, the Ministry of Agrarian Development and Irrigation (MIDAGRI) started work in 2024 on a comprehensive strategy to align with the EUDR; the EU accounts for 48 percent of the country's coffee exports and 30 percent of its cocoa (Agroberichten Buitenland 2024). In May 2025, the country established a "Multisectoral Working Group for Sustainable Agricultural Productive Development and the marketing of coffee chains, cocoa, oil palm and other associated products, as part of compliance with European Union Regulation (EU) 2023/1115"; the group includes representatives from 15 different government departments and agencies (MIDAGRI 2025a).

The strategy includes a process of geo-referencing agricultural land—particularly for coffee, cocoa, and palm oil production in the Amazon region—to provide the geolocation data required to verify deforestation-free sourcing. MIDAGRI has worked with regional governments and agencies of the 13 regions accounting for the bulk of the country's coffee and cocoa production (MIDAGRI 2025b). Another key component of the strategy is the update and formalization of the "rural land cadastre," aimed at improving land tenure security, expanding access to agrarian services, and increasing producer participation in sustainable agricultural systems.

To support implementation, the government is investing in capacity building, training producers on new land access procedures and environmental management practices that align with sustainability standards. Supported by the National Coffee Board and the Peruvian Association of Cocoa Producers, MIDAGRI has organized a series of regional technical workshops aimed at cocoa and coffee producers, designed to develop technical skills, improve understanding of the EUDR, and gather key information for the design of sectoral actions (MIDAGRI 2025c).

Uruguay, a major beef exporter, has a comprehensive individual electronic traceability system for livestock has been in place since 2011, and similar systems for timber, soybeans, and cattle hides are under development (INAC 2024). In September 2024, the government claimed that the entire country was ready for compliance with the EUDR, based on these systems and its deforestation-free status (verified by UNDP since 2015) (EU MSP 2024b).

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