

EUDR Coffee — Due Diligence & Compliance Pathways

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The Three-Step Due Diligence Framework

Article 8 of the EUDR establishes a mandatory three-step due diligence process that every operator must complete before placing coffee on the EU market. This is not optional due diligence — it is a legal prerequisite for market access.

Step 1: Information Collection

The operator must collect all Article 9 information for the specific consignment:

- Geolocation coordinates (point or polygon) of every production plot that contributed to the consignment
- Description and quantity of the product, including Combined Nomenclature (CN) code
- Country of production (and, if applicable, parts thereof — i.e., department/municipality in Colombia)
- Supplier identification: name, postal/email address, and where applicable, registration number for each actor in the supply chain
- Buyer identification: name, postal/email address for the entity receiving the product in the EU
- Date or time range of production (harvest season)
- Adequately conclusive and verifiable information that the products are deforestation-free
- Adequately conclusive and verifiable information that the production was in compliance with the relevant legislation of the country of production

Step 2: Risk Assessment

Based on the collected information, the operator must assess the risk that the coffee is non-compliant. The risk assessment must consider:

- **Country or sub-national risk:** The Commission's benchmarking classification (low/standard/high risk) for the country or region of production. For Colombia, this may vary sub-nationally — Eje Cafetero is inherently lower risk than the Caquetá-Amazon frontier.

- **Prevalence of deforestation:** Historical deforestation rates in the specific sourcing area, assessed using satellite data (GFW, IDEAM/SMBYC, Sentinel-2).
- **Concerns related to the country of production:** Governance quality, enforcement capacity, corruption indices, land tenure formalization status, conflict-related displacement.
- **Complexity of the supply chain:** More intermediaries increase the risk of traceability breaks. Direct-trade and cooperative-channel supply chains present lower risk than spot-market purchases through multiple brokers.
- **Risk of circumvention:** Whether the product may have been mixed with non-compliant coffee, re-exported through a third country to disguise origin, or had fraudulent documentation.
- **Complementary information:** Satellite imagery analysis, existing certifications (Rainforest Alliance, 4C, FairTrade), third-party verification reports, and information from civil society organizations.

Step 3: Risk Mitigation

If the risk assessment reveals anything other than negligible risk, the operator must take adequate and proportionate risk mitigation measures. These may include:

- Requesting additional information or documentation from suppliers
- Commissioning independent third-party audits or field verification
- Obtaining satellite imagery analysis for the specific production plots for the post-2020 period
- Engaging with local stakeholders or civil society for ground-truth information
- For blended lots: obtaining geolocation and deforestation-free evidence for each contributing farm

Only when risk is assessed as negligible (after mitigation if initially elevated) may the operator proceed to submit the Due Diligence Statement.

The Due Diligence Statement (DDS)

The DDS is the formal declaration that the operator submits to the EU's EUDR Information System before the product enters the EU market. Key requirements:

- The DDS must be submitted electronically through the designated EU IT platform
- It must reference all Article 9 information and confirm that due diligence has been exercised
- The DDS receives a unique reference number that must accompany the product through EU customs
- Operators must retain all supporting documentation for at least 5 years from the date of the DDS
- Competent authorities in EU Member States may inspect the DDS and underlying documentation at any time during the retention period
- False or misleading DDS submissions constitute a violation subject to the full penalty regime

The Role of FNC's Cédula Cafetera in Compliance

Colombia has a structural advantage over many coffee-producing countries: the FNC's cédula cafetera system already provides a farm-level identification and registration mechanism that maps closely to EUDR requirements. A compliance pathway leveraging the cédula cafetera would work as follows:

1. The caficultor's cédula cafetera number serves as the supplier identification (linked to the national ID — cédula de ciudadanía)
2. SICA provides the geolocated farm data associated with that cédula cafetera
3. At the purchase point, the cooperative records the cédula cafetera number against the parchment coffee purchased, creating the first traceability link
4. Through the dry mill and export chain, the cédula cafetera-linked lot data flows forward

5. The exporter cross-references the farm's SICA coordinates against IDEAM/SMBYC and GFW data to verify deforestation-free status
6. If verification passes, the DDS is submitted with the geolocation data and cédula cafetera-based supply chain record

This pathway is viable for the ~70% of Colombian coffee that flows through FNC-affiliated cooperatives. For the ~30% that moves through private channels (comercializadores privados), parallel traceability systems must be established.

Simplified Due Diligence for Low-Risk Countries

If the European Commission classifies Colombia (or specific sub-regions) as low risk, operators sourcing from those areas would benefit from simplified due diligence: reduced information requirements, lower verification intensity, and faster DDS processing. This creates a strong incentive for Colombia to invest in national-level deforestation monitoring and EUDR compliance infrastructure — as a low-risk classification would reduce the compliance burden on all 540,000 coffee families and maintain market competitiveness relative to other origins.

Third-Party Verification and Audit Frameworks

Several third-party verification frameworks are emerging or adapting to serve EUDR compliance needs:

- **Rainforest Alliance (RA):** Updated its 2020 standard to include geolocation data collection and deforestation monitoring. RA's farm data can partially satisfy EUDR Article 9 requirements, but operators must independently verify the data and cannot rely solely on RA certification as EUDR compliance.
- **4C (Common Code for the Coffee Community):** Provides a baseline sustainability standard with some traceability elements. Less granular than RA for EUDR purposes but covers a larger share of the global coffee trade.
- **Proforest/3PRCL:** Emerging EUDR-specific verification services offering satellite-based deforestation risk assessment integrated with supply chain data.
- **SGS, Control Union, Bureau Veritas:** Traditional auditing firms developing EUDR compliance verification products, including field audits and documentary review.

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