EUDR Coffee — Regulation Overview

commodity	coffee
regulation	EU Regulation 2023/1115 (EUDR)
article9_fields	geolocation, supplier_identification, deforestation_free_date, due_diligence_statement
cutoff_date	2020-12-31
enforcement_large	2024-12-30
enforcement_sme	2025-06-30
primary_country	Colombia
schema_version	1.1
last_updated	2026-05-27

Scope of the EUDR for Coffee

EU Regulation 2023/1115 — the European Union Deforestation Regulation (EUDR) — entered into force on 29 June 2023. It targets seven commodity groups linked to global deforestation: cattle, cocoa, coffee, oil palm, rubber, soya, and wood. For coffee, the regulation covers all forms placed on the EU market: green (unroasted) beans, roasted beans, ground coffee, soluble/instant coffee, coffee extracts and concentrates, and coffee husks and skins. The Combined Nomenclature (CN) codes covered include 0901 (coffee, whether or not roasted or decaffeinated), 2101 11 (extracts, essences, and concentrates of coffee), and associated derivative codes.

Article 9 — Mandatory Due Diligence Information

Article 9 of the EUDR specifies the information that operators and traders must collect, verify, and retain before placing coffee on the EU market or exporting it from the EU. The mandatory fields are:

- **Geolocation of production plots:** For plots larger than 4 hectares, a polygon boundary (set of latitude/longitude coordinate pairs) is required. For plots equal to or smaller than 4 hectares, a single GPS point (latitude/longitude with sufficient decimal precision — at least 5 decimal places, ~1.1 m accuracy) is acceptable. This is the field that presents the greatest compliance challenge for smallholder coffee producers in Colombia, where the average finca cafetera is 1.5–2.0 hectares.
- **Supplier identification:** Name, address, and where applicable, registration/tax identification number of each actor in the supply chain — from finca to exporter. In Colombia, the FNC's cédula cafetera (coffee farmer ID card) serves as a farm-level identification instrument that can map to this requirement.
- **Deforestation-free verification:** Evidence that the production land was not subject to deforestation (conversion of forest to agricultural use) or forest degradation after the cutoff date of 31 December 2020. Verification may use satellite imagery (Sentinel-2, Planet Labs, Landsat), national monitoring systems (IDEAM/SMBYC in Colombia), or third-party audits.

- **Due diligence statement (DDS):** A formal declaration submitted through the EU Information System (TRACES or the dedicated EUDR IT platform) before the product enters the EU market. The DDS must reference the geolocation data, confirm deforestation-free status, and be linked to the specific consignment.
- **Legality:** Confirmation that production complied with the relevant laws of the country of production, including land use, environmental protection, labour rights, tax obligations, and indigenous/community land rights (FPIC — Free, Prior, and Informed Consent).

Enforcement Timeline

The regulation applies in two phases based on operator size:

- **Large operators (non-SMEs):** Enforcement from 30 December 2024. This covers the major EU importers (e.g., Neumann Kaffee Gruppe, VOLCAFE, Sucafina, Louis Dreyfus Company) and large roasters (Nestlé, JDE Peet's, Lavazza, illycaffè).
- **SME operators and traders:** Enforcement from 30 June 2025. This phase brings smaller importers, specialty roasters, and trading houses into scope.

After enforcement, any operator placing non-compliant coffee on the EU market faces penalties determined by each EU Member State, which must be "effective, proportionate and dissuasive." Penalties may include fines proportional to environmental damage and market value, confiscation of products, temporary exclusion from public procurement, and prohibition from using the simplified due diligence procedure.

Country Benchmarking System

The European Commission will classify producer countries into three risk tiers:

- **Low risk:** Simplified due diligence (reduced documentation requirements). Countries with negligible deforestation rates and robust governance frameworks may qualify.
- **Standard risk:** Full due diligence as described in Article 9. This is the default tier and where Colombia is expected to be classified initially.
- **High risk:** Enhanced due diligence with additional verification requirements, increased sampling rates for checks, and more frequent audits. Countries with high deforestation rates and weak enforcement may be classified here (e.g., parts of the Amazon frontier in Peru or Brazil).

The benchmarking assessment considers: rate of deforestation and forest degradation, rate of expansion of agriculture for relevant commodities, production trends, and information from indigenous peoples and local communities. The initial country benchmarking list was expected by 30 December 2024 but has been subject to delays. Colombia's classification will significantly impact the compliance burden on its ~540,000 coffee-farming families.

Interaction with Existing Certification Schemes

The EUDR explicitly states that existing voluntary sustainability certifications (Rainforest Alliance, UTZ — now merged into Rainforest Alliance, 4C, FairTrade International) do not automatically confer EUDR compliance. However, these certifications may partially satisfy due diligence requirements — particularly around farm-level traceability, environmental management plans, and audit trails. Operators using certified supply chains still need to independently verify geolocation and deforestation-free status against satellite data for the post-2020 cutoff date.


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