EUDR Learning Community for Africa

July 9th Meeting — Session 1 Minutes

Record of discussion, decisions, and follow-ups from the July 9th session.

Meeting Overview

The inaugural virtual meeting officially launched the EUDR Learning Community for Africa as a collaborative platform for African coffee stakeholders to exchange knowledge and practical experiences on implementation of the EU Deforestation Regulation (EUDR). Organized by AFCA and COSA, the meeting brought together representatives from the European Union, national coffee platforms, development partners and industry stakeholders.

Key Learnings

The meeting generated several key insights and practical lessons that will guide ongoing EUDR implementation efforts across Africa's coffee sector; including following:

- Collaboration across public and private sectors is essential for successful EUDR implementation.
- Digital traceability, geolocation and interoperable data systems are becoming critical for EU market access.
- Open-source technologies provide practical and affordable compliance solutions.
- Smallholder inclusion, continuous capacity building and peer learning remain priorities.
- EUDR presents an opportunity to modernize governance, transparency and sustainability across the coffee value chain.

Agenda & Discussion

Part 1 — Updates on EUDR (Matthias Reusing, European Union Delegation to the African Union)

Matthias Reusing provided an overview of recent EUDR developments, revised implementation timelines, simplification measures, and available guidance while emphasizing that the Regulation's objectives and legal requirements remain unchanged.

He highlighted the EU's continued efforts to support stakeholders in understanding and preparing implementation through updated guidance documents, Frequently Asked Questions (FAQs), training resources, and enhancements to the EU Information System. He also explained the rationale behind the implementation postponement and simplification package, noting that these measures are intended to facilitate implementation without weakening the Regulation. Participants were encouraged to use the additional preparation time to strengthen traceability systems, improve due diligence processes, and build the technical capacity required to meet EUDR requirements before the Regulation becomes fully applicable.

The European Commission has postponed the application of the EUDR to the end of 2026 for most operators and introduced simplification measures; such as streamlined due diligence requirements and enhanced implementation guidance; to provide stakeholders with additional time and practical support for compliance while maintaining the Regulation's core objectives.

Part 2 — Learnings from the Field: Kenya EUDR compliant export experience (George Watane, Kenya Coffee Platform)

George Watane presented Kenya's coordinated approach, highlighting farmer registration, digital traceability, geolocation, stakeholder coordination, and the successful pilot export of an EUDR-compliant coffee shipment using open-source tools.

The presentation demonstrated how collaboration among government institutions, industry actors, cooperatives, and development partners has supported Kenya's readiness for EUDR implementation. Mr. Watane explained how digital public infrastructure and open-source technologies were integrated to improve transparency from farm to export, enabling successful verification of coffee origins and compliance requirements. He also discussed the practical challenges encountered—including maintaining accurate farmer records and integrating different information systems—and emphasized that continuous stakeholder collaboration and investment in digital infrastructure will be essential to scaling EUDR compliance across the sector.

Kenya successfully completed a pilot export of an EUDR-compliant container of coffee to Poland using open-source digital tools, QR-code-enabled traceability, and coordinated stakeholder collaboration, demonstrating that practical and cost-effective solutions can support compliance for coffee-exporting countries.

Part 2 — Learnings from the Field: Uganda EUDR compliant export experience (Scovia Namusobya, Uganda Coffee Platform / Café Africa)

Scovia Namusobya shared Uganda's national implementation progress, including large-scale farmer registration, polygon mapping, development of a national data warehouse, traceability prototypes, and pilot exports to Europe.

She emphasized Uganda's coordinated national framework that brings together government agencies, exporters, cooperatives, and technology partners to build an integrated compliance system. The presentation highlighted the country's significant progress in mapping coffee farms, developing centralized data systems, and testing traceability solutions through pilot exports. Ms. Namusobya noted that these efforts are helping improve supply chain transparency while identifying practical implementation challenges that must be addressed before full-scale compliance, particularly around data quality, interoperability, and sustained support for smallholder farmers.

Uganda has registered more than 1.5 million coffee farmers and mapped over 1.65 million farm polygons, while testing end-to-end traceability systems through pilot coffee exports to Europe, illustrating the scale of national coordination required to prepare for EUDR implementation.

Part 3 — Field Assessment: From Regulation to Practice (Matthew Himmel, COSA)

Matthew Himmel discussed practical implementation challenges including traceability, legality verification, interoperability, and data governance, emphasizing collaborative, scalable, and field-oriented approaches.

Drawing on implementation experiences from multiple producing countries, he illustrated how EUDR requirements can be translated into practical actions at farm and supply chain levels. He stressed that successful implementation depends on reliable data collection, interoperable digital systems, and coordinated approaches to legality verification rather than isolated organizational efforts. The session also demonstrated how practical, low-cost digital solutions and strong partnerships can help countries build efficient compliance systems that not only meet EUDR requirements but also strengthen long-term sector resilience and market competitiveness.

The presentation demonstrated how freely available digital tools can support first-mile traceability, geolocation, and supply chain transparency, while emphasizing that effective legality verification and data governance require coordinated action among governments, exporters, cooperatives, and technology providers rather than isolated efforts by individual organizations.

Q&A

The meeting concluded with an interactive Q&A session, where participants sought clarification on key aspects of EUDR implementation, shared experiences, and discussed practical compliance challenges. Key discussion highlights are summarized below.

Questions addressed to Mr. Matthias Reusing

1. **What is your consideration of the high compliance cost of the EUDR for smallholder producers and small-scale cooperatives, and the resulting risk of excluding these categories from EU supply chains?**

   ANSWER

   EUDR is not intended to exclude smallholder producers; rather, smallholders should be recognized and rewarded for their role in producing sustainable coffee. The responsibility for compliance should be shared across the value chain, with operators and importers supporting the costs associated with building sustainable and traceable supply chains.

The EU's simplification measures also provide more straightforward due diligence procedures for smaller operators. While EUDR does not regulate the price paid to farmers, it should not result in reduced prices for producers. Instead, it encourages responsible value-chain partnerships where actors share the benefits and contribute to the long-term sustainability of coffee production.

There is also a need to communicate the value behind sustainable coffee to consumers, highlighting the efforts of smallholders and encouraging greater appreciation for quality coffee produced through responsible practices.

2. **According to the EUDR policy, what is the definition of "forest" in that context, as distinct from nationally or governmentally identified conserved forests?**

ANSWER

Under the EU Deforestation Regulation (EUDR), the relevant concept of "forest" follows the FAO-based definition used in the Regulation. In the EU Deforestation Regulation (EUDR) (EU) 2023/1115, the definition of "forest" is set out in Article 2(4). Here is the exact wording: "forest" means land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use.

So, if a national system labels an area differently, that does not override the EUDR definition. National classifications may still matter for other legal or administrative purposes, such as biodiversity protection, land tenure, conservation status, forestry management rules. However, for assessing compliance with the EUDR deforestation cut-off and forest-conversion rules, the EUDR's own definition is the one that applies.

Questions addressed to Mr. George Watane

3. **Could you tell us what percentage of Kenyan coffee is EUDR compliant? Would traceability to the cooperative level work for EUDR?**

ANSWER

a. Available data indicate that around 90% of active coffee farmers (those regularly delivering cherries for processing) have been mapped. With this mapping data integrated into traceability systems, over 80% of Kenyan coffee is expected to be able to meet EU market requirements under EUDR.

b. Traceability up to the cooperative level already exists in Kenya's coffee value chain. The main gap for EUDR compliance is strengthening traceability from the cooperative level down to the individual farm plots through geolocation data.

4. **To what extent did the off-taker in Poland compensate producers for the additional costs of producing traceable, EUDR-compliant coffee?**

ANSWER

The Kenya EUDR Working Group has emphasized that smallholder farmers should not bear the additional costs of EUDR compliance alone. To address this, partnerships and cost-effective solutions, including the use of open-source tools, have been explored to support geolocation data collection.

In the specific case of the Polish buyer, the direct trade arrangement created a win-win outcome, as farmers received prices above the prevailing auction price, helping to offset compliance-related efforts. More broadly, efforts are ongoing to mobilize support from buyers, government, and partners to ensure that the costs of EUDR compliance are shared across the value chain rather than transferred to smallholders. For example, the Government of Kenya has committed approximately USD 1.2 million in public funding to support farm geolocation data collection.

Questions addressed to Mrs. Scovia

5. **How do we access the Uganda system as a Ugandan coffee exporter? Does the system track coffee at the export level, or at different stages of aggregation?**

ANSWER

Ugandan coffee exporters can access the system by applying through the EUDR and CSDDD Taskforce via eudrtac@ugandacoffee.go.ug. The system supports traceability across the value chain, tracking coffee from the first point of transaction through the different stages of aggregation up to the final export stage.

6. **How did you obtain the deforestation risk assessment tool, and how are farmers who legally live inside protected areas handled?**

ANSWER

The current deforestation risk assessment tool is from a commercial provider, Meridia. However, Uganda is also in the process of developing a harmonized approach to legality and deforestation risk assessment through the National EUDR Taskforce.

The Taskforce Legality Working Group (LWG) is working with the European Forest Institute (EFI) to adapt and contextualize a due diligence and legality assessment tool that reflects Uganda's legal and institutional framework.

This includes the use of national forest information, satellite data, and land-use information to support the assessment of deforestation risk and provide credible evidence (ground truthing) for EUDR implementation.

Regarding farmers located within protected areas, Uganda recognizes that each case must be assessed individually and the approach to be used will be determined by the output from the legality framework.

Additional Questions

7. Could you please post the link to the repository for country regulations?

ANSWER

In its 4 May 2026 EUDR update, the European Commission announced plans to establish a legal information repository that will help economic operators identify the national legislation relevant to the production of commodities and derived products covered by the EUDR.

The repository will not be maintained directly by the Commission. Instead, producer countries will be responsible for providing and updating information on the legislation applicable within their jurisdictions. To ensure the information is consistent, relevant, and aligned with the EUDR legal framework, the Commission will supply standardized templates indicating the required content.

The Commission intends to make the repository available before the EUDR enters into application on 30 December 2026. Producer countries and other relevant stakeholders will be invited to contribute information so that the repository is as complete and useful as possible for operators carrying out legality due diligence.

8. How is the coffee industry leveraging the African Regional Standard (ARS 1000) to enhance sustainability and comply with evolving market requirements, including the EUDR?

ANSWER

The African Regional Standard for Sustainable Coffee (ARS 1000) provides a common sustainability framework for the African coffee sector, with the objective of harmonizing sustainability requirements across producing countries and facilitating market access.

While ARS 1000 is not an EUDR compliance standard and does not by itself demonstrate compliance, it can support EUDR implementation by promoting good agricultural and environmental practices, strengthening farm management and record-keeping, and improving traceability and transparency within coffee supply chains. These elements can provide a useful foundation for meeting EUDR due diligence requirements when complemented by additional measures such as plot geolocation, deforestation risk assessment, legality verification, and robust chain-of-custody systems.

9. I would like to ask about recommended and approved organizations that issue DD certificates.

ANSWER

According to the European Commission, there are currently no recommended, approved, or officially recognized organizations authorized to issue EUDR Due Diligence (DD) certificates or Due Diligence Statements (DDSs) on behalf of companies. Under the EUDR, the legal responsibility for conducting due diligence and submitting the Due Diligence Statement rests with the operator, and this responsibility cannot be delegated or transferred to a third party. Third-party certification schemes or verification services may support the due diligence process by providing information, audits, traceability systems, or risk assessments, but they do not replace the operator's legal obligations and do not constitute proof of EUDR compliance.

Under Article 2(15) of the EUDR, an operator is a natural or legal person that places a relevant product on the EU market for the first time or exports it from the EU in the course of a commercial activity. Depending on the supply chain, this may include an EU importer, an EU producer, a manufacturer placing a new relevant product on the market, or an exporter. The operator is the entity legally responsible for exercising due diligence, assessing and mitigating risks, and submitting the Due Diligence Statement through the EUDR Information System before placing or exporting the product.

Therefore, if you are looking for an organization officially approved by the European Commission to issue EUDR DD certificates, no such approval system currently exists. Companies may choose to work with private service providers or certification bodies to support their due diligence processes, but these organizations cannot issue an EU-recognized certificate of EUDR compliance or assume the operator's legal responsibility.

10. Our biggest problem in Ethiopia is a lack of access to a deforestation risk assessment tool. Can anyone help us get free access to one?

ANSWER

There are several free or open-access tools that can support plot-level deforestation risk assessments for EUDR due diligence. Two widely used options are:

1. **Open Foris WHISP** (What's in That Plot?), developed by the Food and Agriculture Organization (FAO), is a free and open-source tool that analyzes geolocated farm plots using multiple satellite and land-use datasets to provide information relevant to deforestation risk assessments.
2. **Sylva,** developed by the European Forest Institute (EFI), provides free access to deforestation risk assessment capabilities for EUDR implementation. The platform integrates geospatial datasets and Earth observation information to support the assessment of deforestation risk for geolocated production plots and is being made available to stakeholders as part of EFI's support to EUDR implementation.

   It is important to note, however, that no single tool can determine EUDR compliance on its own. The Regulation requires operators to conduct a due diligence process that combines geolocation data with a broader risk assessment, considering additional factors such as country risk classification, supply chain complexity, the reliability of available information, and, where relevant, compliance with applicable legislation in the country of production.

11. Beyond the EUDR itself, are there complementary tools or initiatives being developed to address broader sustainability issues, such as sustainable soil management and the underlying drivers of deforestation?

ANSWER

Yes. Uganda recognizes that EUDR compliance alone will not address the root causes of deforestation or ensure long-term sustainability. The National EUDR Action Plan therefore includes a range of accompanying measures that go beyond regulatory compliance and support the transformation of Uganda's coffee sector.

These measures include promoting climate-smart coffee production, agroforestry, and sustainable soil and water management practices such as mulching, composting, soil fertility improvement, erosion control, and water conservation. In addition, efforts are being made to rehabilitate existing coffee farms through rejuvenation and stumping, enabling farmers to increase productivity on existing farmland rather than expanding into forested areas.

The Action Plan also prioritizes farmer capacity building and extension services, digital traceability and farmer registration systems (Farmer Digital Profile), improved land governance, and stronger collaboration among government institutions, the private sector, development partners, and farmer organizations. These efforts are complemented by initiatives to support landscape restoration and forest conservation, recognizing that protecting forests requires coordinated action beyond the coffee value chain alone.

The broader objective is not only to maintain access to the EU market but also to build a more resilient, productive, and sustainable coffee sector that improves farmer livelihoods while conserving Uganda's forest resources.

12. Does the EUDR impose any specific requirements on the packaging of green coffee beans during export, or are there recommended best practices to ensure compliance throughout the supply chain?

ANSWER

The EUDR does not prescribe specific packaging materials or packaging standards for green coffee beans. The packaging standard is jute or burlap sacks combined with hermetic or polyethylene inner liners.

13. How can a similar EUDR network or community be established in Ethiopia?

ANSWER

The EUDR Learning Community for Africa was established as a pre-competitive platform for stakeholders to exchange experiences, learn from one another, and collaborate on EUDR implementation. The establishment of national communities is therefore left to stakeholders within each country and is outside the scope of the Learning Community.