

EUDR Learning Community for Africa

September 4th Virtual Meeting Minutes:

From Requirements to Implementation: Practical Tools and Approaches for EUDR Compliance

Record of discussion, decisions, and follow-ups.

Meeting Overview

The second virtual meeting focused on practical digital and methodological approaches to EUDR implementation, with particular attention to farm mapping and geolocation, deforestation-risk assessment, digital traceability and data interoperability, and legality due diligence. The session emphasized how complementary tools can support smallholder organizations, cooperatives and SMEs without requiring them to build complex systems from scratch.

Key Learnings

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

- Digital tools for geolocation, traceability, risk assessment and legality due diligence are increasingly important for practical EUDR implementation.
- No single tool or approach addresses all EUDR requirements; complementary systems and methodologies are needed across the supply chain.
- Open-source and accessible digital solutions can provide practical and affordable options, particularly for smallholder organizations and SMEs.
- Data quality, interoperability and organizational readiness are as important as the technology itself for effective implementation.
- Legality due diligence requires a risk-based and context-specific approach, rather than a simple checklist or document-collection exercise.
- National legal mapping and stakeholder engagement are essential to ensure that relevant legal requirements are properly identified, understood and kept up to date.

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- Practical capacity building, peer learning and continued collaboration remain critical to address implementation challenges and supporting inclusive EUDR compliance.

Agenda & Discussion

Part 1 — Digital Solutions for Farm-Level Data and Risk Assessment (FAO)

Rémi d'Annunzio, Forestry Officer at the Food and Agriculture Organization (FAO), presented FAO's digital tools, including **GROUND**, **WHISP** **and related applications**, highlighting their use for farm mapping, geolocation, data collection, interoperability, and deforestation-risk assessment.

The presentation demonstrated how accessible digital tools can support the collection and management of farm-level data required for EUDR compliance. GROUND can support plot identification and geolocation, while WHISP provides risk-assessment outputs that can be downloaded and further used by supply-chain actors. The discussion emphasized the importance of data quality, appropriate approaches for different farm sizes, interoperability between digital systems, and the need to complement digital outputs with appropriate validation and verification processes.

The session demonstrated that open and accessible digital tools can significantly reduce practical barriers to farm-level data collection and EUDR risk assessment. At the same time, their effectiveness depends on the quality and completeness of the underlying data, their adaptation to local contexts, and their integration into broader traceability and due diligence systems.

Part 2 — Digital Traceability and Data Management: INAtrace (GIZ SAFE)

Juan Fernando Larco, Technical Advisor – Agricultural Value Chains – Digital Transformation at GIZ Ecuador, presented **INAtrace**, an open-source digital solution designed to support traceability, data management, and supply-chain transparency. He provided an overview of the solution and its potential to help supply-chain actors structure, manage, and exchange information required for effective traceability and EUDR implementation.

The presentation highlighted the importance of understanding existing processes, information flows, and data requirements before introducing a digital solution. INAtrace can be adapted to different supply-chain contexts and has potential to support interoperability between systems. However, successful implementation requires appropriate technical capacity, clearly defined organizational processes, reliable data, and effective data governance. Participants also discussed the potential for wider application of the solution and the availability of guidance and technical support for organizations interested in exploring its use.

The presentation demonstrated that effective digital traceability is not solely a technology issue. Sustainable implementation requires a combination of appropriate digital tools, clear business processes, reliable and standardized data, interoperability, and sufficient organizational capacity to maintain and use the system effectively.

Part 3 — Legality Due Diligence: From Legal Requirements to Practice (European Forest Institute – EFI)

Alice Bisiaux, Legal Expert at the European Forest Institute (EFI), presented the **Legality Due Diligence Navigator**, explaining how operators and other supply-chain actors can identify relevant national legal requirements and apply a risk-based approach to verifying compliance. The presentation provided practical guidance on navigating the legal dimensions of EUDR due diligence across different producing-country contexts.

The presentation covered key areas of legislation relevant to EUDR, including land-use rights, environmental protection, labour and human rights, taxation, trade and customs, and third-party rights. Ms. Bisiaux emphasized that legality due diligence should not be treated as a simple checklist or document-collection exercise, but rather as an ongoing process of information gathering, risk assessment, verification, and risk mitigation, supported where appropriate by stakeholder engagement and consultation with relevant authorities and other actors.

The session highlighted the importance of systematically mapping and regularly updating national legal frameworks, while recognizing practical challenges related to enforcement, data availability, administrative procedures, and smallholder production realities. It also underscored the value of practical, risk-based approaches that help operators identify relevant legal risks and determine proportionate measures for verification and mitigation.

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 Rémi d'Annunzio

1. **About the system Ground, is it approved by the EU (that its Due diligence statement is recognized). And how much is the charge per use?**

   ANSWER

   When evaluating digital tools for EU Deforestation Regulation (EUDR) compliance, using software like Ground is entirely free, with zero subscription charges or usage fees. Operators can collect farm-level coordinates and generate boundary polygons as extensively as needed without incurring licensing costs. However, Ground serves exclusively as an open-source data collection tool; it does not generate or file legal Due Diligence Statements (DDS) directly.

A central takeaway is that EUDR compliance cannot be treated as a simple box-ticking exercise. Crucially, the European Union does not officially approve, label, or certify any compliance tool or software platform. There is no "white pass" or master list of recognized technologies that guarantees automatic regulatory compliance.

The legal burden of proof rests entirely on the operators placing commodities on the EU market. Importers and operators are legally responsible for conducting thorough due diligence and gathering sufficient, verifiable information within reasonable limits. While software tools are not officially endorsed, public open-source initiatives like Ground are developed under technical frameworks such as the Team Europe Initiative (including the SAFE project). This ongoing institutional backing signals strong encouragement from European counterparts for supply chain actors to adopt open digital public infrastructure for their compliance workflows.

2. **I tried using WHISP, and it is excellent. However, it does not seem to cover some of the criteria required by operators, such as overlapping areas, proximity to deforestation, built-up areas, and similar indicators. Are these features available or planned?**

ANSWER

Whisp scope is to assess land use at plot level. The deforestation risk flags are based on an assessment of land use before and after 2020. Anything else is outside the scope and not planned. For proximity to deforestation, you can run a Whisp analysis on the buffer of your geometries. For overlapping areas, you can look into the georoots tools, maintained by EFI. If you have any questions, you can ask them at forest-monitoring@fao.org.

3. **I tried using WHISP, can we download the risk assessment report from WHISP?**

ANSWER

The primary output generated by WHISP is a downloadable raw tabular dataset containing all the underlying core data required for deforestation risk evaluations. While WHISP itself focuses on serving this raw structured data rather than styled document reports, several integrated platforms and traceability tools leverage WHISP data to generate user-friendly reports. For instance, Earth Map enables users to download concise summary reports for individual geometries, GIZ's Hugging Face chatbot interface produces structured risk reports, and INATrace incorporates WHISP data directly into its platform to generate downloadable compliance reports.

4. **How can an organization become an implementation partner with FAO for GROUND and WHISP?**

ANSWER

Whisp and Ground are entirely open and free and published under open licenses, so you don't need to be a partner to use them. If you have any questions, you can ask them at forest-monitoring@fao.org

5. **Are GROUND and WHISP freely available to all users? Can anyone use these tools to conduct their own deforestation-risk analysis? If so, where can they access the tools and user guidance?**

   ANSWER

   Yes, OpenForis solutions are entirely open and free and published under open licenses, so they can be used by anyone. All guidance and access are on the main landing pages:

   - www.openforis.org/whisp
   - www.openforis.org/ground
   - www.openforis.org/geoid

6. **Have the geolocation tools been tested on commercial size farms and how easy are they to use for large areas?**

   ANSWER

   Geolocation tools like Ground have been extensively tested across diverse farm sizes and geographical contexts globally, with the FAO-hosted database currently managing around 300,000 geometries. Mapping large commercial holdings poses practical challenges because physically walking or driving extensive boundaries is unfeasible. To address this, Ground combines mobile GPS positioning with an intuitive on-screen manual drawing feature. Field collectors can stand in a central location and accurately draw or adjust farm boundaries directly over high-precision satellite imagery on their screen, providing a fast, practical, and accurate method for capturing large farm geometries.

Questions addressed to Juan Fernando Larco

7. **What free tools are available to Nigerian traders exporting EUDR-regulated commodities to the EU market, and how can interested organizations establish a partnership for INATrace implementation?**

   ANSWER

   To access open-source and freely available digital tools for EUDR compliance such as WHISP, INATrace, Ground, or GIZ resources, exporters and operators can visit the SASSY or DIASA community web pages, where these tools and technical documentation are centralized.

   Regarding **INATrace**, although the underlying source code is open-source and freely accessible, implementing it within a specific organization requires a structured technical deployment process rather than an immediate off-the-shelf setup. To support broader access, a standardized version of INATrace is currently being developed alongside implementation guidance and manuals to allow for easier deployment across countries. Furthermore, work is underway with partners to establish a dedicated help desk. Interested organizations and potential partners are encouraged to stay connected and follow updates published on the SASSY and DIASA platforms as these standardized deployment packages and support channels become available.

Questions addressed to Alice Bisiaux

8. What is the Legal process to register land that was cleared for production after 31 December 2020 to enable participation and trade with the EU?

ANSWER

Under the EU Deforestation Regulation (EUDR), land cleared of forest after the 31 December 2020 cutoff date cannot meet EUDR deforestation-free requirements.

EUDR compliance requires meeting two independent and cumulative criteria: legality and being deforestation-free. Even if land conversion or clearance is fully legal under a producer country's national legal framework, commodities produced on land cleared after 31 December 2020 remain non-compliant with the EUDR and cannot be exported to or traded within the EU market.

Because post-2020 land clearance automatically fails the deforestation-free requirement, operators do not need to evaluate the national legality of forest conversion that took place after the cutoff date. Determining national land clearance legality is only relevant for land converted prior to 31 December 2020, subject to the specific requirements of each country's legal framework.

9. How does the Legality DD Navigator framework address situations where smallholders do not have formal land-use rights certificates but hold land under customary or other legally recognized tenure arrangements?

ANSWER

Where smallholders hold land under customary or other legally recognized tenure arrangements that are not systematically documented, the legality due diligence tools developed using the Legality Due Diligence Navigator methodology recommend due diligence actions that reflect this reality. The approach recognizes that such tenure arrangements may be legally valid and widespread in many producing countries, and that the absence of a formal land-use certificate does not, in itself, indicate non-compliance.

Accordingly, the recommended due diligence measures do not rely exclusively on collecting formal tenure or land-use documents. Depending on the country context and the risks identified, alternative means of verification may include consulting relevant local stakeholders—such as village or customary authorities, local administrative officials, civil society organizations or local NGOs—to identify any known land disputes or competing claims in the sourcing area; verifying whether the cooperative or producer organization has an accessible grievance or anonymous complaints mechanism and reviewing any land-related complaints received and how they were addressed; and, where available, consulting public records or databases on land disputes, forced displacement or evictions.

The objective is therefore not to require documentation that smallholders may not legally be required, or reasonably expected, to possess, but to identify proportionate and context-appropriate means of assessing whether their land-use rights are legally recognized and whether there are credible indications of conflicting rights or claims.

10. How is agricultural land that was legally acquired and cleared up after the EUDR cut-off date, with all required national permits, but is not located within a gazetted forest area, treated under the EUDR?

ANSWER

This question concerns primarily the EUDR's deforestation-free criterion, rather than its legality criterion. The two requirements are separate and cumulative: relevant products must both be produced in accordance with the relevant legislation of the country of production and be deforestation-free.

Therefore, even where land was legally acquired and all permits required under national law were obtained for its conversion to agricultural use, this does not in itself make products produced on that land EUDR-compliant. If the land met the EUDR definition of "forest" immediately before it was converted to agricultural use (i.e. according to the FAO definition of forests[1]), its conversion after the EUDR cut-off date of 31 December 2020 would constitute deforestation for the purposes of the Regulation, irrespective of whether the area was formally designated or gazetted as forest under national law.

In such a case, the clearance may comply with the EUDR's legality requirement, provided all relevant national legal requirements were met, but products produced on the converted land would not meet the EUDR's deforestation-free requirement. As both criteria must be satisfied, those products would not be EUDR-compliant.

Additional question addressed to all

11. Which components of an EUDR compliance system can realistically be implemented using completely free tools, and where would you recommend investing in paid technologies or professional services?

ANSWER

Understanding "free" vs. "open source" in EUDR compliance: when we talk about "free" tools for EUDR compliance, it is important to distinguish between software license costs and implementation effort. Zero-license tools like **WHISP** have no direct software fees, though they do require an investment in staff time and training. On the other hand, open-source solutions like **INATrace** make their source code freely accessible but setting them up still requires technical expertise and backend infrastructure to host and deploy effectively.

What smallholders and Co-ops can do with free tools: for producer organizations and small-to-medium enterprises (SMEs), baseline due diligence can be carried out using accessible, low-cost options. Tasks such as polygon mapping, farm-level data collection, and managing an Internal Control System (ICS) can be managed with existing open-source tools. In value chains like cocoa, many smallholder organizations can meet their local compliance needs without taking on expensive software subscriptions.

Where enterprise importers need paid solutions: the dynamics change for large multinational importers and enterprise supply chains. When managing vast data volumes

[1] *Land spanning more than 0.5 hectares with a tree canopy cover of more than 10 percent, where trees must be able to reach a minimum height of 5 meters at maturity, and the land must not be primarily under agricultural or urban use (https://www.fao.org/4/y1997e/y1997e1m.htm)*

across multiple countries, free tools hit their scaling limits. Large importers need dedicated investments in enterprise software systems and professional verification/auditing services to aggregate data, guarantee cross-border traceability, and deliver verifiable due diligence statements to regulatory authorities.

The bottom line for compliance strategy: there is no single "right" software for everyone. Smallholder groups and local co-ops can lean heavily on freely available tools for farm-level mapping and internal management. However, as data flows up the supply chain to enterprise buyers, paid technologies and professional services become necessary to handle multi-country aggregation, system integration, and official verification.