EUDR INFORMATION SYSTEM
DEMO AND DISCUSSION FOR COFFEE STAKEHOLDERS

14 February 2024

EUDR: The role played by the information system

Isabelle Lemmens, Sustainability Manager ECF

THE EUDR IS A REALITY...WITH THE FOLLOWING TIMELINE

EUROPEAN COFFEE FEDERATION

29 June 23

30 December 24

30 June 2025
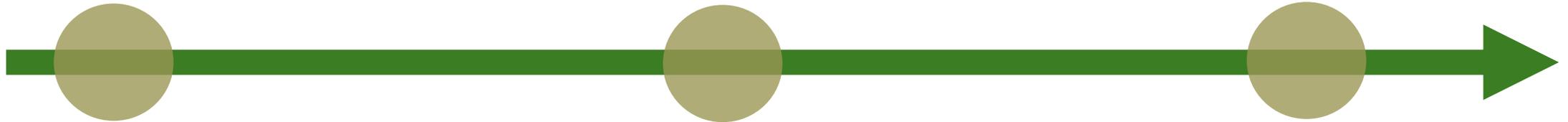
Entry into force

(established the legal existence of the Regulation)

Entry into application

(the Regulation is aplicable to ALL except MSE operators)

Applicable to MSEs operators as well

EUDR MAIN REQUIREMENTS

1. **Deforestation-Free (cut-off date: 31/12/2020)**

2. **Having been produced in accordance with the relevant legislations of the country of production** (including applicable human & labour rights)

+ Covered by a DD statement (submitted in the IS):

- Name and address of the operator/trader

- Geocoordinates or polygon points ($\geqslant$4 hectares)

- Self declaration that DD was carried out and that no or only negligible risk was found out

⚠ DDS ≠ information requirements (article 9)

DDS Information System WorkFlow
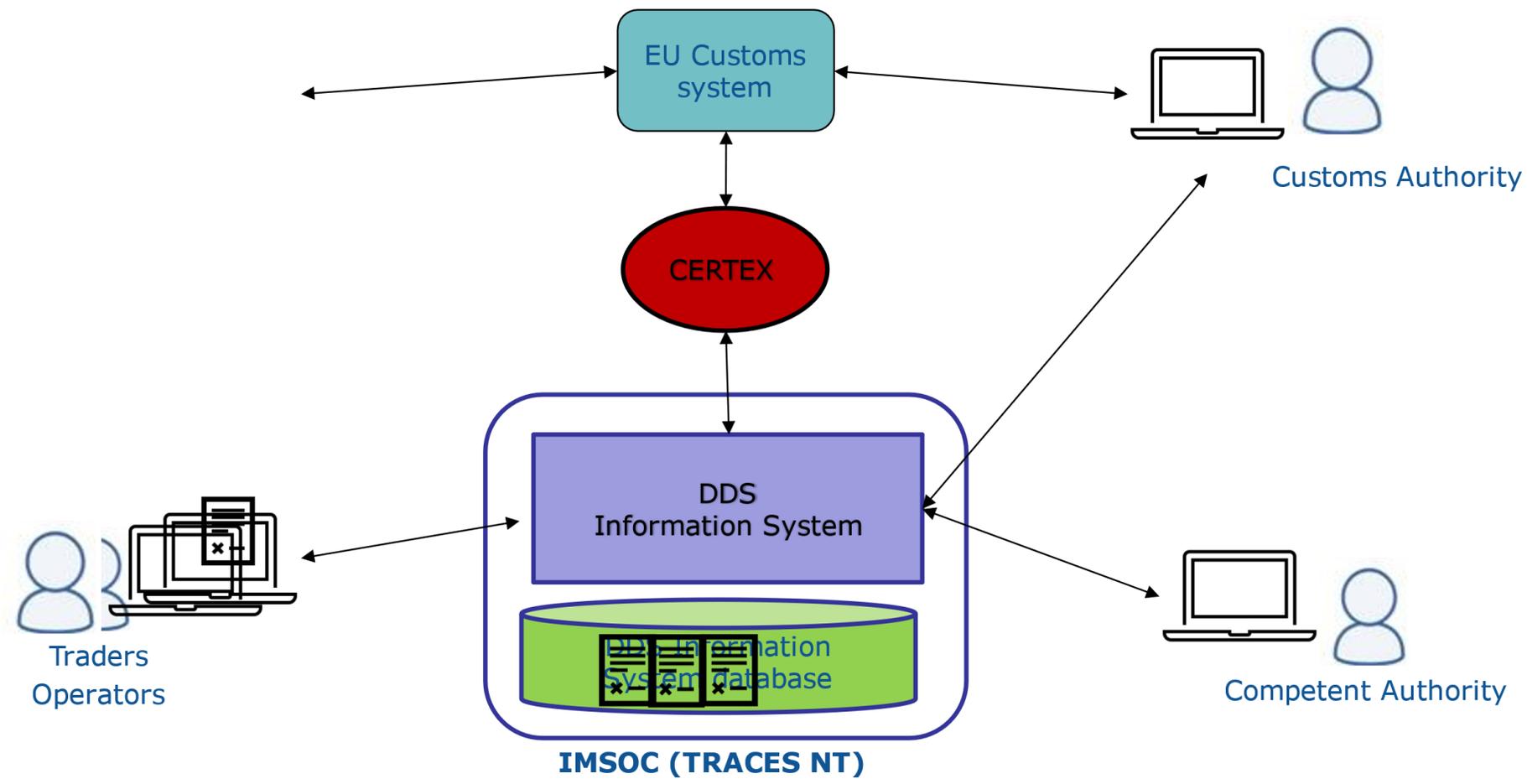
EC MULTISTAKEHOLDER PLATFORM TO PROTECT & RESTORE THE WORLD'S FORESTS

The Platform focuses on the EUDR implementation, including:

- Advising EC and EU MS on the implementation of the Regulation;

- Foster exchanges on best practices across stakeholders/operators and EU MS

+ oversight of the Information System development and testing

Main activities (EC + platform):

- Information System
- FAQ (latest update: 22 December 2023)
- Benchmarking
- Guidelines
- Reviews (1y – 2y – 5y)

ECF is an official member and the only representative of the coffee sector in the multi-stakeholder platform.

EUDR INFORMATION SYSTEM PILOT TEST

- Through official members of the MSP, selection of 100 private stakeholders from all relevant sectors to have a varied pool of participants in terms of commodities, size of economic operators and geography.

- Pilot test ran from 18 December 2023 to 31 January 2024.

- Objective: identify and solve possible issues and collect feedback to improve the existing functionalities of the system.

- 8 selected coffee companies

DEMO
Information System Functionality

Alexey Naumov, LDC

Challenges identified in the EU trial test

Dario Di Santolo, illycaffé

1. **Missing functionality for upload and download for large DDS files**

   - Geolocation entry and upload is inadequate for the accurate processing required by the regulation.

   - When importing geolocations, inconsistent behavior demonstrated by geolocation files (.json and .geojson)

   - Single polygon .json files which we typically collect from our suppliers were not importable using the 'Import' button, but had to be imported manually through the "select geolocation on map" function. But it is only possible to upload one file per production place, which is time-consuming and not efficient.

   - Impossibility to upload other geolocation formats like .kml, kmz, .shp, .csv, Excel, etc.

- The system does not yet provide an upload template for companies/users

- No way to export submitted information including the TRACES reference for post-review and documentation (exported GeoJSON files are not readable by any software). It would be interesting to download the DDS statement from TRACES in PDF to be able to comply with the 5-year documentation retention requirements.

2. **Requirement for API or batch import**

- Need for an API or Batch Import of DDS information that could be automated, not just for location files but the entire customs and non-customs due diligence requirements. This would require JSON or XML or similar templates.

3. **Missing validations**

- There are no controls preventing human errors: it is possible to submit form with the polygons located in a country different from indicated production country, point can be submitted for an area over 4 hectares.

4. **Searching function**

   - There are options to have multiple declarants connected to the same operator, therefore there would be a need to include a search function by operator, submission date, producer, address, country of production or company internal reference number.

5. **Timelines and communication DDS validation and DDS non-compliance**

   - Timelines on amendments / changes to compliance status or similar may not be clear if a product has been further traded within the market to downstream customers. Need for clarification of the time frame for a complete validation of a DDS.

   - On testing the 'WITHDRAWAL' and 'AMENDMENT' Features - Validation Information is not visible for verification by the operator / user.

6. **Portal support**

- The EUDR portal support exclusively provides technical assistance and does not address operational queries.

7. **Non-EU operators cannot create DDS statements in TRACES**

- There should be a solution allowing entities based in non-EU countries and exporting products in scope to EU to feed the data in the system.

8. **NEXT STEPS**

- Other test sessions are not planned yet

- Some fixes applied during test phase but no info on future release (current is an alpha version)

User interface

8 Create a case - manually

What is the production Place – Land of origin?

What is the meaning of producer name?
Name of the Farmer ?
Name of the cooperative?
Name of the trader?

What is the Production Place Description?
Address of the farmer?
Address of the cooperative ?
...

Area and Typ (GeoData) is mandatory – point or polygon

For what for there is the second producer name? Coffee is f. e. imported as single origin – the DDS should be generated for a specific shipment?

6. Commoditiy (ies) or Product(s)

+Add Commoditiy or Product   × Remove All

1

| 09 | KAFFEE, TEE, MATE UND GEWÜRZE | 🗑 Remove |
| 0901 | Kaffee, auch geröstet oder entkoffeiniert; Kaffeeschalen und Kaffeehäutchen; Kaffeemittel mit beliebigem Kaffeegehalt | |

Commoditiy (ies) or Product(s) Description *   Net Mass (Kg) *   Volume (m3)   Supplementary Units

test test   5000

Scientific Name   Common Name

1   Scientific Name   Common Name

+ Add Production Place   ⬆Import   🔁 Export

1 Producer Name   Producer Country : *

No country selection

#	Production Place Description	Area *	Typ *	Actions
1		ha	Point	× + 📍
2		ha	Polygon	× + 📍
3		ha	Point	× + 📍

2 Producer Name   Producer Country :

No country selection

| # | Production Place Description | Area * | Typ * | Actions |

11 Create a case – Geodata map
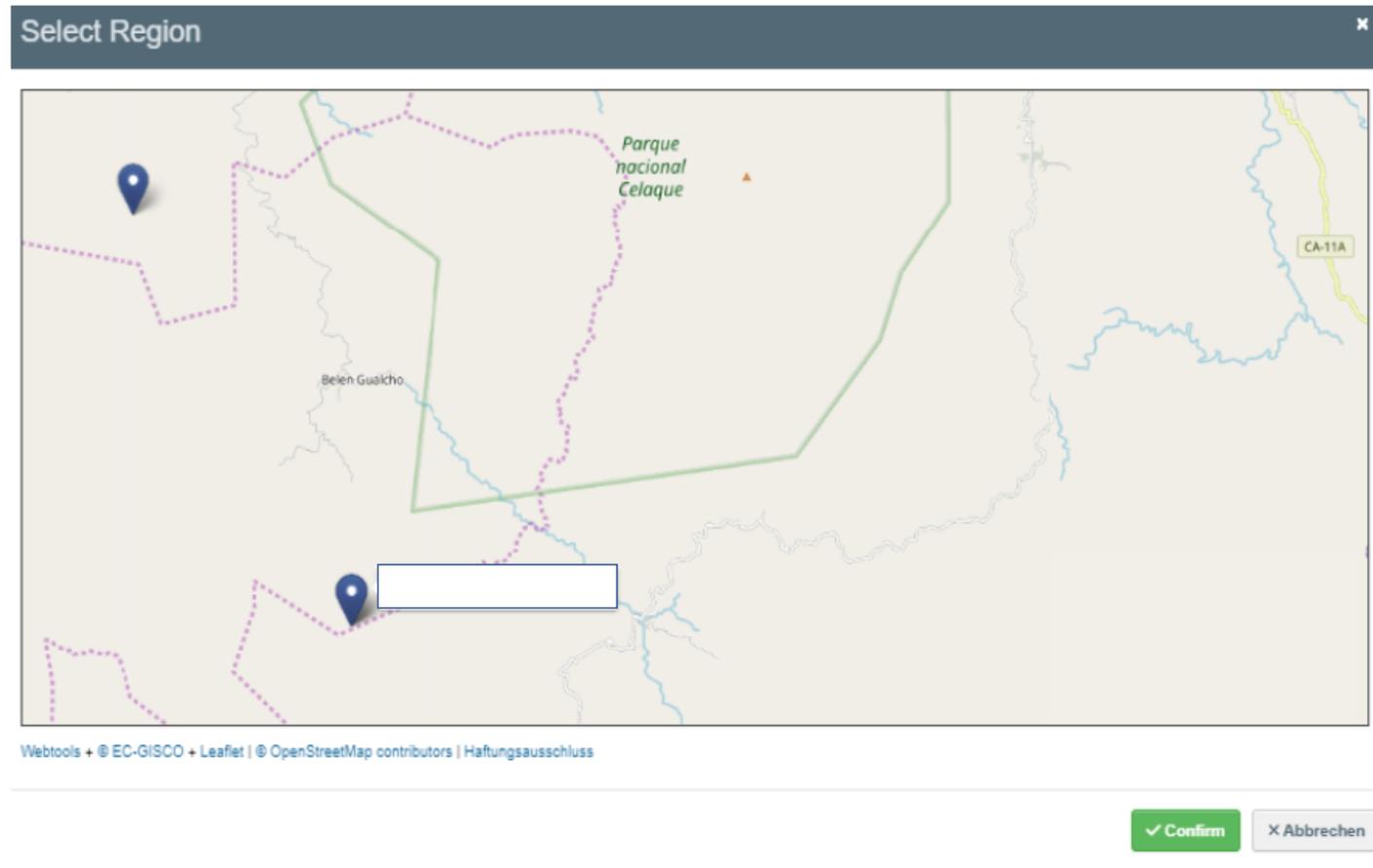
- By click on the GEO Data you can zoom deeper in map details

- You can only see this kind of map no forest or trees

- You can zoom only in direction with higher resolution – going back to a display with a better overview is only possible when you open the map again

Q&A

THANK YOU FOR ATTENDING!