

EUDR AND MARKET ACCESS

The EUDR Readiness Guide

What African exporters need to do before their products reach the EU market.

For exporters of cocoa, coffee, timber, rubber, palm oil, soya and cattle, and for the EU buyers who source from them.

Grounded in BALIA Consulting published guidance on the EU Deforestation Regulation, including Regulation (EU) 2025/2650.

BALIA Consulting
AfCFTA, EUDR, Trade Compliance, Export Readiness
baliaconsulting.com

What this guide covers

This guide turns the EU Deforestation Regulation into a practical sequence you can act on. It follows the same order BALIA uses with clients: confirm whether the rules apply to you, prepare the supply chain in the right order, collect the right geolocation data, and build a due diligence file that your buyer can actually file.

1. Does the EUDR apply to you	3
2. The six stages to prepare your supply chain	4
3. Geolocation data: what to collect	7
4. The due diligence statement, step by step	9
5. Costs and who pays: the smallholder reality	11
6. Readiness checklist	12
Talk to BALIA Consulting	13

How to use this guide. Work through the stages in order. Each stage depends on the one before it. Most difficulty we see comes from attempting due diligence before the supply chain has been mapped, or collecting geolocation data before the chain of custody is clear. If you only have time for one section today, start with the readiness checklist on page 12 and work backwards.

Regulation references reflect BALIA Consulting published material, including Regulation (EU) 2025/2650 as published in the Official Journal of the EU on 23 December 2025. This guide is general information, not legal advice. Check your buyer requirements and the current EU information system guidance for your shipment.

SECTION 1

Does the EUDR apply to you

Products entering the EU must be traceable to the land they came from, produced in line with the law of the producing country, and not linked to deforestation after the regulation cut-off date. The obligation is documentary. What decides whether a shipment moves is whether the evidence exists and holds together.

Products in scope

The regulation applies most directly to seven commodities and a range of derived products: cocoa, coffee, rubber, wood and timber, palm oil, soya and cattle. That covers a large share of what Cameroon and the wider region sell into Europe. Processed and derived goods can fall in scope even where the raw commodity was bought domestically.

Who carries the legal obligation

The obligation sits with the EU based operator placing the goods on the market, typically your buyer or their importer of record. In practice, the exporter does the data collection and the buyer files. A due diligence statement can only be as good as the information supplied upstream, and buyers are increasingly refusing to contract with suppliers who cannot provide it in the format their compliance system expects.

You may act as operator, downstream operator or trader depending on your position in the chain. Confirming that role early changes what evidence you need to hold and what you need to pass on.

Key dates to work from

Milestone	What BALIA published guidance states
Deforestation cut-off	31 December 2020. Products must be deforestation free after this date.
Regulation (EU) 2025/2650	Published in the Official Journal of the EU on 23 December 2025.
Large and medium operators	Must comply from 30 December 2026.
Micro and small operators	Must comply from 30 June 2027, but buyers are asking for data now, well ahead of that deadline.

The extra year in Regulation (EU) 2025/2650 is best read as time to do data collection properly, not as time to wait. Exporters who use 2026 to build a plot level system will be the ones buyers still source from in December 2026.

Quick test. If you export an in-scope commodity to the EU, supply someone who does, or your buyer has started asking for geolocation evidence, assume the EUDR affects your next contract. Confirm scope product by product before you plan costs.

SECTION 2

The six stages to prepare your supply chain

Each stage depends on the one before it. Most firms that struggle do so because they attempted stage four without completing stage two. The sequence below follows BALIA published guidance on the EUDR Market Access page.

1 Establish whether the EUDR applies

Identify which of your products fall inside scope, including derived products, and confirm whether you act as operator, downstream operator or trader for each product line. Record the decision and the reason. That record prevents wasted mapping on out of scope lines and missed obligations on lines that look domestic but are not.

Output: a product by product scope register with HS codes, markets and role.

2 Map the supply chain

Trace every intermediary from the point of EU placement back to the producing plot. For cocoa and coffee this means buying stations and cooperative unions. For timber it means the actual harvested area for a given consignment, not just the concession as a whole. For rubber and palm oil, plantation and smallholder supply often need two different collection approaches in one chain.

Output: a chain map that names every actor and every point where product is bulked or mixed.

3 Assess risk

Document the risk of non-compliance across country, sub-national, supply chain and data reliability factors. Cameroon currently sits in the EU standard risk category, which means buyers face a 3 percent compliance check rate rather than the 1 percent reserved for low risk countries. Your assessment should show where risk concentrates and what you will do about it.

Output: a written risk assessment that your buyer can reference in their filing.

Six stages, continued

4 Prepare due diligence

Assemble the information your buyer needs before a shipment can be placed on the EU market. The due diligence file needs to connect product description, country of production, geolocation and risk evidence into one coherent record per consignment. Treating this as a one-off exercise fails on the second shipment, so design for repetition from the start.

Output: a due diligence template and a named owner inside your organisation.

5 Assemble legality evidence and risk mitigation

Collect legality evidence for the country of production, design mitigation measures where risk is identified, and prepare supplier clauses and a record retention approach. For timber, a FLEGT licence demonstrates legal sourcing. It does not on its own demonstrate that the specific harvest area was not deforested or degraded after 31 December 2020. That gap is where most timber preparation is needed.

Output: legality evidence pack, mitigation plan and supplier terms.

6 File the due diligence statement

The EU operator submits the Due Diligence Statement through the EU information system before goods are placed on the market or exported. Your job is to supply data that survives verification and to keep shipping with a defensible evidence file behind every consignment, with a system that repeats next season.

Output: a per shipment evidence file and a repeatable filing rhythm with your buyer.

Where exporters get tripped up. Aggregated or estimated coordinates, a single GPS point for a collection centre rather than individual plots, and missing chain of custody linkage when product from ten plots is bulked at a buying station. The fix is procedural: keep plot level data attached to the batch, not lost at the point of mixing.

SECTION 2

Where the obligation bites hardest

The work differs by commodity. Use this view to prioritise your first mapping and evidence effort.

Cocoa

Hundreds of thousands of smallholdings. Evidence of land tenure is usually harder than geolocation itself. Cooperative delivery is efficient, but data quality varies and needs quality control.

Coffee

Arabica and Robusta through cooperative unions, where cohort delivery is efficient but plot attribution must be maintained through bulking.

Rubber and palm oil

Plantation and smallholder mixed supply, requiring two different collection approaches in one chain. Plantation operators often hold land records, but rarely in a form the regulation will accept without rework.

Wood and timber

FLEGT legality systems already exist. The work is the gap between those systems and what the EUDR requires: plot level geolocation, cutting block records and a separate deforestation free determination.

Derived products

Processed and derived goods can fall in scope even where the raw commodity was bought domestically. Establish scope for finished products as well as raw material lines. Soya and cattle follow the same logic: traceability to production land, legality and the 2020 cut-off.

What BALIA does in this phase

- EUDR readiness assessment: where you stand against the requirements, with a costed roadmap to close the gap.
- Supply chain mapping: every intermediary traced from EU placement back to the producing plot.
- Traceability advisory: field protocol, enumerator training, data schema and quality control for plot level collection.
- Risk assessment, due diligence preparation and bilingual exporter training for staff, suppliers and cooperative members.

Geolocation data: what to collect

For a cooperative aggregating cocoa or coffee from several hundred smallholders, geolocation is the single biggest operational burden in the regulation. It is also where money is most often wasted, either by collecting too little or by over engineering the format.

The requirement, stated precisely

For any plot of 4 hectares or larger, the regulation requires a polygon, the outline of the plot. For plots under 4 hectares, the overwhelming majority of smallholder cocoa and coffee farms in Cameroon, a single latitude and longitude point is sufficient. Cooperatives sometimes run a full polygon mapping exercise for farms that only need a point, at several times the cost and time.

A GPS point captured with a standard smartphone, with accuracy of a few metres, is adequate. Survey grade equipment is not required. What matters is that the point is captured on the actual plot, attributed to a specific identifiable farmer, and stored in a format such as GeoJSON or a compatible spreadsheet of decimal degree coordinates that can be attached to that farmer produce through the buying record.

Three failure modes to avoid

1. **One point per collection centre, not per farm.** The coordinate has to represent the production plot, not the place farmers deliver to. Centre point data fails verification.
2. **Coordinates collected once, never linked to subsequent harvests.** New members, replanted plots and boundary disputes need an update process.
3. **No chain of custody between the plot and the bag.** Use a simple lot numbering system tying each delivery to a farmer ID, which in turn ties to a mapped plot.

Do not build the export facing system before the farm data exists. That sequencing error is the most common source of wasted spend on geolocation projects. Build the register first, then formalise the file your buyer will query.

A realistic build sequence, starting from zero

1 Register every member

Assign a unique farmer ID to every registered producer. Without a stable ID, geolocation cannot be linked to deliveries.

2 Capture one GPS point per plot under 4 hectares

A field agent with a basic smartphone app can process dozens of farms a day. Capture on the plot, check accuracy, and record farmer ID, plot size estimate and date.

3 Link farmer ID to delivery

Build a simple digital or paper to digital record linking farmer ID to delivery weight and date at the buying station. This is the chain of custody.

4 Formalise the export facing file

Only then create the traceability file your buyer due diligence process will query, with plot register, delivery linkage and quality checks.

Timber needs a different approach

Cocoa and coffee geolocation deals with static smallholder plots. Timber concessions involve harvest areas that shift within a broader concession boundary over time. The unit that needs geolocating is the actual harvested area for a given consignment. That requires GIS based concession and cutting block mapping. Confirm whether your existing legality documentation includes geolocated cutting block records, not just concession boundaries, and whether your buyer needs a standalone EUDR risk assessment separate from FLEGT paperwork.

Practical standard: digitised plot register with GPS per farmer; documented chain of custody from farm to first buying point, and a named person who owns the file.

SECTION 4

The due diligence statement, step by step

Under Regulation (EU) 2025/2650, large and medium sized operators placing in scope commodities on the EU market must submit a Due Diligence Statement through the EU information system before those goods can be placed on the market or exported. Micro and small operators have until 30 June 2027, but most are selling into supply chains where a large buyer is asking for the data now.

Who files, who supplies

The EU based operator files. The exporter supplies. Without upstream data in the expected format, the statement cannot be submitted and the buyer will source elsewhere. Agree in writing who files and what data they need from you, especially if you sell through an intermediary.

What a statement contains

Category	What to include
Product description	Commodity, HS code, quantity, and for mixed origin shipments the breakdown by plot of origin.
Country of production	Country where the commodity was produced.
Geolocation	Coordinates of every plot where the commodity was produced: a single point for plots under 4 hectares, a polygon for larger plots.
Risk and legality evidence	Risk assessment and, where relevant, risk mitigation measures. Evidence that the product is deforestation free against the 31 December 2020 cut-off and produced in compliance with the laws of the country of production.

Filing without the scramble

A practical filing sequence

1. Confirm the shipment scope and product description with your buyer, including HS code and quantity.
2. Pull the plot list for that consignment from your register. For mixed origin shipments, keep the breakdown by plot.
3. Attach geolocation for every plot in the list and check point versus polygon rules against plot size.
4. Attach chain of custody records linking deliveries to farmer IDs and plots, especially where product was bulked.
5. Include legality evidence and your risk assessment. Note the standard risk context for Cameroon and any mitigation applied.
6. Send the pack to the EU operator in the format their system expects. Confirm receipt and the reference they will use in the EU information system.
7. Retain the full evidence file per shipment so the process repeats without rebuilding from scratch.

Where statements fail

- Aggregated coordinates for a collection centre instead of individual plots.
- Missing linkage when cocoa from ten plots is bulked and plot data is lost at mixing.
- No plan for the risk category. Standard risk means more checks than low risk, so documentation needs to be tighter.
- A traceability system that produces one clean report but cannot repeat it for the next shipment.

Buyer ready means repeatable. Buyers are consolidating their supplier base around exporters who can produce due diligence information without a scramble. A digitised plot register, a documented chain of custody and a named compliance owner put you in that group.

Costs and who pays: the smallholder reality

Cocoa entering Europe must be traceable to a geolocated plot, proven deforestation free since 31 December 2020, and produced legally. The paperwork lands on the European importer desk. The bill is landing somewhere else.

In a policy brief published on 13 August 2026, Cameroon Forests and Rural Development, Foder, described the cocoa industry economic model as placing a significant share of sustainability requirements on farmers even though they do not control the price at which their cocoa is ultimately sold. The producer bears the costs of the transition and assumes production and compliance risks, but controls neither the price nor the final value of the product.

Why timing makes this harder

Cameroon cocoa farmers have come through a difficult price period, with farmgate prices falling sharply before recovering. It is from a depleted cash position that farmers are being asked to finance farm mapping, traceability systems and legality documentation. Trade Minister Luc Magloire Mbarga Atangana raised the issue at the July Cocoa Days in Yaounde, noting that farmgate levels no longer cover compliance costs, farm inputs and labour for many producers.

The mapping gap

The Cocoa Interprofessional Council had geolocated 150,000 plots covering about 100,000 producers by April 2025, targeting 185,000 plots by the end of that year. Cameroon counts roughly 300,000 cocoa producers. Even at target, a majority of farmers will be unmapped when the deadline hits. Private operators are mapping at roughly 30 to 80 dollars per tonne. Across marketed production, that is a compliance cost running into tens of millions of dollars, paid overwhelmingly through a supply chain that starts with the farmer.

The July 2026 Abuja Declaration, signed by Cote d'Ivoire, Ghana, Nigeria and Cameroon, argued that buyers should share compliance costs. Whether that becomes market practice before 30 December 2026 is uncertain.

The two tiered market is already forming

From 2027, mapped traceable cocoa keeps EU access and commands the compliance premium. Unmapped cocoa gets discounted and rerouted to markets that do not ask the same questions. Farmers who mapped first, mostly those linked to organised cooperatives or exporters with mapping budgets, consolidate their position, while the unmapped smallholder loses value.

What we tell exporters and buyers right now. Map your supply chain to the plot now, because geolocation cannot be created retroactively at the port. Pay for the mapping and treat it as a procurement cost, not as farmer homework. Build the premium into the price, because compliance without a price signal filters out the poorest producers. Systems that do not work for the farmer at the bottom do not work at all.

SECTION 6

Readiness checklist

Use this as a tick box review with your team and your buyer. If you cannot tick an item, that is your next piece of work.

Scope and roles

- ☐ Every product line checked for EUDR scope, including derived products.
- ☐ Role confirmed for each line: operator, downstream operator or trader.
- ☐ Buyer filing responsibility confirmed in writing, including data format required.

Supply chain and geolocation

- ☐ Supply chain mapped from EU placement back to producing plot, with bulking points named.
- ☐ Digitised plot register with GPS per farmer, point under 4 hectares, polygon at or above 4 hectares.
- ☐ Farmer IDs stable and linked to delivery weight and date at buying station.
- ☐ Update process in place for new members, replanted plots and boundary changes.
- ☐ For timber: geolocated cutting block records held, not just concession boundaries.

Risk, legality and due diligence

- ☐ Written risk assessment covering country, sub national, supply chain and data reliability factors.
- ☐ Legality evidence pack assembled for country of production.
- ☐ Mitigation measures documented where risk is identified, with supplier clauses updated.
- ☐ Due diligence template ready per shipment, with product, HS code, quantity and plot breakdown.
- ☐ Named compliance owner in your organisation and record retention approach agreed.
- ☐ System tested on a second shipment, not just the first.

If three or more items are unticked, prioritise Stages 1 to 3 before investing in export facing software. Data first, system second.

NEXT STEP

Talk to BALIA Consulting

If you export to the EU, or you buy from African producers, the question is not whether the evidence will be asked for. It is whether it exists, holds together and can be produced without a scramble when your buyer asks.

BALIA helps African exporters and EU buyers build that evidence in the right order: readiness assessment, supply chain mapping, traceability advisory, risk assessment, due diligence preparation and exporter training. Advice that stays close to the shipment, with owners and dates.

Book a 30 minute consultation. Bring your product list, your main EU market and where you are on mapping. We will tell you plainly what to do next and what it is likely to cost to close the gap.

Book a consultation: cal.com/baliaconsulting/30min

Email: info@baliaconsulting.com

Sources and further reading on baliaconsulting.com

- EUDR Market Access page: six stages, commodity view and how BALIA helps.
- EUDR Due Diligence Statements: a step by step filing guide.
- Regulation (EU) 2025/2650: what the one year delay and simplifications actually changed.
- Geolocation data for EUDR: what smallholder cooperatives actually need to collect.
- Timber and EUDR: what Cameroon forestry exporters are facing in 2026.
- Who pays for deforestation free: Cameroon cocoa farmers are asking.

This guide draws only on BALIA Consulting published material listed above. Regulation timelines and requirements change. Confirm current requirements with your buyer and official EU guidance before shipping.

BALIA Consulting
AfCFTA, EUDR, Trade Compliance, Export Readiness
baliaconsulting.com