

EUDR Implementation Checklist: Step-by-Step Approach

Deadline: December 31, 2026

Compliance Required From: January 1, 2027

Critical Export Cutoff: October 2026 (products exported after this date must be compliant for January 2027 entry into EU)

Phase 1: Preparation & Assessment (Months 1-2)

1.1 Understand EUDR Requirements

- Review the full EU Deforestation Regulation (EUDR) text and official guidance documents
- Identify which commodities your organization handles (coffee, cocoa, cattle, oil palm, rubber, soya, wood, and derived products)
- Understand the deforestation-free requirement (post-December 31, 2020 baseline)
- Familiarize yourself with the due diligence obligations for your position in the supply chain
- Assess penalties for non-compliance (up to 4% of EU turnover or product seizure)

1.2 Conduct Internal Gap Analysis

- Map your current supply chain from origin to export
- Identify all suppliers, intermediaries, and trading partners
- Document current data collection methods and systems
- Assess data quality and completeness
- Identify data gaps and missing information
- Evaluate existing traceability capabilities
- Determine resource requirements (staff, technology, budget)

1.3 Stakeholder Alignment

- Secure executive/leadership buy-in and commitment
- Establish a cross-functional EUDR implementation team

- Define roles and responsibilities (data steward, compliance officer, technical lead, etc.)
 - Communicate timeline and expectations to all stakeholders
 - Identify training needs for staff at all levels
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Phase 2: System Selection & Planning (Months 2-3)

2.1 Evaluate Traceability Solutions

- Define technical requirements based on your supply chain structure
- Assess available traceability platforms (e.g., eProd, other solutions)
- Evaluate key capabilities:
 - Plot/farm mapping and GPS geolocation
 - Farmer/producer registry management
 - Transaction and batch tracking
 - Digital stock management
 - Offline-first functionality (for areas with limited connectivity)
 - Integration with national systems (CDWH, DFTG)
 - API capabilities for interoperability
 - Audit trail and immutable record-keeping
 - Multi-language support
 - Mobile app availability
- Compare pricing models and total cost of ownership
- Request demos and proof-of-concept trials
- Check references from existing users in similar contexts

2.2 Develop Implementation Plan

- Create detailed project timeline with milestones
- Define phased rollout approach (pilot region → scale-up)
- Allocate budget and resources
- Identify quick wins and priority areas
- Plan for change management and staff training
- Establish success metrics and KPIs
- Document assumptions and risks

2.3 Data Governance Framework

- Develop data governance policy
 - Define data ownership and stewardship
 - Establish data quality standards
 - Create data validation rules
 - Plan for data privacy and security compliance (GDPR, NDPR, etc.)
 - Document consent management procedures
 - Establish audit and monitoring protocols
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Phase 3: Infrastructure & System Setup (Months 3-4)

3.1 Deploy Traceability Platform

- Procure and license the traceability solution
- Configure system for your organizational structure
- Set up user roles and access controls (RBAC)
- Configure data fields and custom attributes
- Establish integration with national registries (if applicable)
- Set up API connections for interoperability
- Configure backup and disaster recovery procedures
- Ensure data security measures (encryption, firewalls, access logs)

3.2 Establish Data Collection Infrastructure

- Deploy mobile devices/tablets for field agents
- Install mobile applications on devices
- Set up GPS/geolocation capabilities
- Test offline-first functionality
- Configure QR code/barcode systems for batch tracking
- Establish data synchronization protocols
- Test connectivity in remote areas

3.3 Integrate with Payment Systems

- Map existing payment providers (mobile money, banks, PoS systems)

- Configure payment integration in traceability system
 - Establish closed-loop financial trail
 - Test payment transaction recording and verification
 - Ensure payment data links to commodity transactions
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Phase 4: Data Collection & Registry Building (Months 4-8)

4.1 Farmer/Producer Registration

- Conduct farmer census and registration campaigns
- Collect farmer personal information and KYC data
- Establish unique farmer identifiers (UUIDs)
- Create farmer profiles in the system
- Obtain farmer consent for data processing
- Verify farmer information and resolve duplicates
- Establish communication channels with farmers

4.2 Plot Mapping & Geolocation

- Train field agents on GPS mapping and polygon creation
- Conduct plot mapping campaigns in all supply areas
- Collect GPS coordinates for plot boundaries
- Create digital plot polygons/maps
- Assign unique plot identifiers (UUIDs)
- Verify plot information for accuracy
- Document plot attributes (size, crops, ownership, etc.)
- Establish plot versioning system for boundary changes
- Implement duplicate detection mechanisms

4.3 Sustainability Attribute Documentation

- Assess plots for EUDR compliance status
- Verify land use rights and ownership documentation
- Confirm harvest legality and compliance with local laws
- Document labor practices and compliance
- Assess environmental protection measures

- Collect evidence of deforestation-free status (satellite imagery, certifications, etc.)
- Tag plots with sustainability attributes in system
- Establish verification and audit procedures

4.4 Historical Data Collection

- Gather historical transaction records from existing systems
 - Digitize paper-based records where necessary
 - Link historical transactions to plots and farmers
 - Validate data completeness and accuracy
 - Establish chain of custody for historical batches
 - Create audit trail for data entry
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Phase 5: First-Mile Transaction Setup (Months 6-9)

5.1 Transaction Recording System

- Train farmers and intermediaries on transaction recording
- Establish standardized transaction documentation
- Configure transaction templates in system
- Set up transaction ID generation (unique identifiers)
- Establish volume tracking and yield benchmarking
- Implement controls to prevent volume inflation
- Create transaction approval workflows

5.2 Digital Stock Management

- Establish digital warehouse/stock accounts
- Create EUDR-Compliant and Non-Compliant stock accounts
- Implement mass balance tracking
- Set up segregation controls for compliant vs. non-compliant volumes
- Establish stock reconciliation procedures
- Create alerts for stock discrepancies
- Implement physical stock-take module

5.3 Batch Aggregation & Traceability

- Define batch aggregation rules
 - Create hierarchical batch ID system
 - Link aggregated batches to original first-mile transactions
 - Establish batch splitting procedures
 - Maintain parent-child batch relationships
 - Ensure traceability from export back to first-mile
 - Test batch tracking through supply chain
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Phase 6: Interoperability & Integration (Months 7-10)

6.1 Multi-System Interoperability

- Define standardized data formats (JSON, XML, etc.)
- Develop transaction export/import procedures
- Create QR code/encrypted data package system
- Test offline transaction transfers between systems
- Establish data validation for imported transactions
- Document interoperability protocols

6.2 National Registry Integration

- Establish connection with Central Data Warehouse (CDWH) or equivalent
- Configure API push/pull mechanisms
- Map eProd UUIDs to national system identifiers
- Test data synchronization
- Establish error handling and reconciliation procedures
- Create backup procedures for registry failures

6.3 Third-Party System Integration

- Document API specifications (OpenAPI/Swagger)
- Establish authentication protocols (OAuth 2.0)
- Create sandbox environment for testing
- Develop integration documentation

- Support third-party developers and partners
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Phase 7: Pilot Testing & Validation (Months 8-11)

7.1 Pilot Program Setup

- Select pilot region/cooperative for testing
- Recruit pilot participants (farmers, traders, exporters)
- Conduct intensive training with pilot group
- Deploy system in pilot area
- Provide on-site technical support

7.2 System Testing & Validation

- Test all core functionalities (registration, mapping, transactions, tracking)
- Verify data accuracy and completeness
- Test offline-first functionality
- Validate batch traceability from origin to export
- Test interoperability with other systems
- Conduct security and penetration testing
- Verify compliance with EUDR requirements
- Stress test system performance

7.3 Issue Resolution & Optimization

- Document issues and bugs discovered
- Prioritize and resolve critical issues
- Optimize system performance
- Refine workflows based on user feedback
- Adjust data collection procedures
- Update training materials based on lessons learned

7.4 Compliance Verification

- Verify that pilot batches meet EUDR requirements
- Conduct mock EUDR audits

- Prepare compliance documentation
 - Test evidence generation for regulatory submissions
 - Validate audit trail completeness
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Phase 8: Scale-Up & Full Deployment (Months 9-12)

8.1 Expand to Additional Regions/Suppliers

- Develop rollout plan for additional areas
- Conduct farmer recruitment and registration campaigns
- Deploy system to new regions
- Train local teams and field agents
- Establish local support structures

8.2 Continuous Data Collection

- Maintain ongoing farmer registration
- Continue plot mapping in new areas
- Establish regular transaction recording
- Monitor data quality metrics
- Implement feedback loops for data improvement

8.3 Staff Training & Capacity Building

- Conduct comprehensive training for all users
- Create training materials (manuals, videos, guides)
- Establish help desk and support procedures
- Provide ongoing technical support
- Conduct refresher training sessions
- Build local expertise and self-sufficiency

8.4 Quality Assurance & Monitoring

- Establish data quality monitoring dashboards
- Implement regular audits and spot checks
- Create escalation procedures for issues

- Monitor system performance and uptime
 - Track KPIs and progress toward compliance
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Phase 9: Pre-Compliance Audit & Preparation (Months 11-12)

9.1 Internal Audit & Compliance Review

- Conduct comprehensive internal audit of all data
- Verify completeness of farmer and plot registries
- Validate transaction records and traceability
- Review compliance documentation
- Identify and remediate any gaps
- Document audit findings and corrective actions

9.2 Evidence Preparation

- Compile EUDR compliance evidence for all batches
- Prepare due diligence documentation
- Gather supporting documentation (certifications, satellite imagery, etc.)
- Create compliance reports and summaries
- Prepare for regulatory inquiries

9.3 System Hardening & Security

- Conduct final security assessment
- Implement any remaining security measures
- Test backup and disaster recovery procedures
- Verify data encryption and protection
- Establish incident response procedures
- Conduct security awareness training

9.4 Stakeholder Communication

- Communicate compliance status to all stakeholders
- Prepare customer communications
- Brief regulatory authorities if required

- Establish communication protocols for compliance period
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Phase 10: Go-Live & Compliance Period (January 2027 onwards)

10.1 Compliance Monitoring

- Monitor all transactions for EUDR compliance
- Track compliance metrics and KPIs
- Maintain audit trail of all activities
- Respond to regulatory inquiries promptly
- Prepare for potential audits

10.2 Continuous Improvement

- Collect feedback from users
- Identify process improvements
- Optimize workflows and procedures
- Update training materials
- Implement system enhancements

10.3 Regulatory Compliance & Reporting

- Maintain compliance documentation
- Prepare for regulatory inspections
- Submit required reports and evidence
- Address any compliance issues promptly
- Maintain records for audit purposes (7+ years)

10.4 Stakeholder Support

- Provide ongoing technical support to users
 - Address compliance questions and concerns
 - Maintain communication with farmers and traders
 - Support customers in their EUDR compliance efforts
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Critical Success Factors

| Factor | Action |
|----------------------|---|
| Executive Commitment | Secure leadership buy-in and allocate sufficient resources |
| Early Start | Begin implementation immediately; do not wait until deadline |
| Quality Data | Invest in accurate farmer registration and plot mapping |
| Training | Provide comprehensive training to all users at all levels |
| Technology | Select robust, proven traceability platform with offline capabilities |
| Partnerships | Collaborate with government, NGOs, and other stakeholders |
| Farmer Engagement | Build trust and incentivize farmer participation |
| Regular Testing | Conduct continuous testing and validation throughout implementation |
| Documentation | Maintain detailed records and audit trails for compliance |
| Flexibility | Be prepared to adapt to regulatory changes and guidance updates |

Key Milestones & Timeline

| Milestone | Target Date | Status |
|------------------------------------|-------------|--------|
| Gap Analysis Complete | Month 2 | |
| System Selected & Contracts Signed | Month 3 | |

| Milestone | Target Date | Status |
|--------------------------------------|--------------------------|---------------|
| System Deployed & Configured | Month 4 | |
| Farmer Registration Campaign Launch | Month 4 | |
| Plot Mapping 50% Complete | Month 6 | |
| First Transactions Recorded | Month 6 | |
| Pilot Program Complete | Month 11 | |
| Full System Deployment | Month 12 | |
| Pre-Compliance Audit Complete | Month 12 | |
| EUDR Compliance Deadline | December 31, 2026 | |
| Compliance Enforcement Begins | January 1, 2027 | |

Risk Mitigation Strategies

High-Risk Areas

1. Data Quality Issues

- Risk: Incomplete or inaccurate farmer/plot data
- Mitigation: Implement rigorous validation rules, conduct regular audits, provide training

2. Low Farmer Adoption

- Risk: Farmers reluctant to participate or provide information
- Mitigation: Build trust, provide incentives, demonstrate benefits, engage community leaders

3. Technology Failures

- Risk: System downtime or data loss
- Mitigation: Implement redundancy, regular backups, disaster recovery plan, offline-first design

4. Regulatory Changes

- Risk: EUDR requirements change or new guidance issued
- Mitigation: Monitor regulatory developments, maintain flexibility, engage with authorities

5. Supply Chain Complexity

- Risk: Difficulty tracking products through complex supply chains
- Mitigation: Establish clear protocols, standardize procedures, implement interoperability

6. Interoperability Challenges

- Risk: Difficulty integrating with national systems or other platforms
- Mitigation: Plan early, establish clear standards, conduct extensive testing

7. Resource Constraints

- Risk: Insufficient budget, staff, or technical capacity
- Mitigation: Secure adequate funding, build team capacity, leverage external expertise

Key Documents to Prepare

- EUDR Compliance Policy
- Data Governance Framework
- Traceability System Procedures Manual
- Farmer Training Materials
- Field Agent Guidelines
- Transaction Recording Standards
- Batch Aggregation Procedures
- Interoperability Protocols
- Incident Response Plan
- Audit Trail Documentation
- Compliance Evidence Templates

- Staff Training Curriculum
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Recommended Tools & Partners

- **Traceability Platform:** eProd Solutions (or equivalent)
 - **Geospatial Analysis:** Satellite imagery providers, GIS tools
 - **Data Management:** Cloud infrastructure (AWS, Azure, Google Cloud)
 - **Training & Capacity Building:** Local NGOs, industry associations
 - **Regulatory Guidance:** Government agencies, industry consortiums
 - **Audit & Compliance:** Third-party auditors, compliance consultants
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Final Checklist: Ready for EUDR Compliance?

- All farmers and plots registered and mapped
 - All transactions recorded with complete traceability
 - All batches linked to first-mile transactions
 - EUDR compliance status verified for all products
 - Audit trail complete and immutable
 - Interoperability tested with national systems
 - Staff trained and competent
 - Systems tested and validated
 - Compliance documentation prepared
 - Regulatory requirements understood and met
 - Contingency plans in place
 - Ready for regulatory inspection
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Remember: The December 31, 2026 deadline is firm. There will be no further extensions. Start implementation now.