

The EUDR Coffee Compliance Checklist & Role Matrix

Operational Verification Framework for 2026/2027 Enforcement Readiness

1. EUDR ROLE DETERMINATION DECISION TREE STEP 1

Q1: Are you the first legal entity clearing green coffee into EU free circulation (Importer of Record)?

YES → UPSTREAM OPERATOR
You must collect plot Geolocation, conduct full Risk Assessment, and file a full Due Diligence Statement (DDS) before customs release.

NO → Proceed to Question 2
The coffee was already placed on the market under a prior DDS by an upstream entity.

Q2: Do you process the coffee in a way that alters its Annex I CN Code (e.g., Roasting 0901.11 → 0901.21, or Decaffeination)?

YES → DOWNSTREAM OPERATOR
You do NOT repeat full plot due diligence. You must retain partner data & upstream DDS reference numbers. Non-SMEs must register in EU System.

NO → Proceed to Question 3
The CN commodity code remains identical before and after your operation.

Q3: Do you trade or distribute the green or roasted coffee without changing its CN Code?

YES → TRADER
Maintain supplier/buyer data for 5 years. Retain received DDS numbers. Non-SME traders must fulfill information system verification duties.

DUAL-ROLE NOTE: If you both import green coffee AND roast it within the same legal entity, you hold BOTH Operator and Downstream Operator roles. *DDS reference numbers do NOT need to be communicated internally.*

2. GEOJSON & FARM GEOLOCATION CRITERIA CHECKLIST TECHNICAL VERIFICATION

✓	Technical Metric	Requirement & Tolerances	Status / Verification
☐	Plot Size Threshold	Plots > 4 hectares require Polygon coordinates covering the perimeter. Plots ≤ 4 hectares permit a single Point coordinate.	MANDATORY
☐	Coordinate Precision	WGS84 datum format (latitude/longitude) with minimum 6 decimal places (~0.1m accuracy).	MANDATORY
☐	Deforestation Cut-Off Date	Satellite overlay confirmation showing NO deforestation or degradation occurred on the plot after 31 December 2020 .	MANDATORY
☐	Legality Verification	Proof of production legality under origin country law (land tenure rights, environmental rules, labor standards, local taxes).	MANDATORY
☐	File Format Standards	GeoJSON or shapefile containing clean, non-overlapping closed rings without self-intersecting polygon boundary lines.	TECHNICAL STANDARD

Document / Data Asset	Responsible Role	Key Information To Retain	Audit Priority
Due Diligence Statement (DDS) & Ref Number	Upstream / Downstream Operators	Official DDS confirmation number generated by the EU Information System upon registration.	HIGH PRIORITY
Plot Geolocation Datasets	Upstream Operators	Raw GeoJSON/Point polygon mapping data tied to specific container batches and bill of lading numbers.	HIGH PRIORITY
Commercial Partner Records	Downstream Operators & Traders	Name, postal address, email, and tax IDs of immediate suppliers (previous step) and buyers (next step).	HIGH PRIORITY
Risk Assessment Records	Upstream Operators	Documented evaluation of origin risk rating, country legality compliance, and mitigation steps taken.	MEDIUM PRIORITY
Invoices & Shipping Manifests	All Supply Chain Actors	Commercial Invoices, Bills of Lading (B/L), Certificates of Origin, and Phytosanitary Certificates linking lots.	STANDARD AUDIT

Internal Audit Sign-Off Notes:

Non-compliance penalties under EUDR can reach up to 4% of EU-wide total annual turnover. Verify all 5-year data retention systems are hosted on secure, backed-up digital infrastructure with instant retrieval capability upon Competent Authority requests.