DTF Trading Partners
COCOA & GREEN COFFEE · CAMEROON → EU

EUDR Compliance Checklist for Cocoa & Coffee Importers

Regulation (EU) 2023/1115 on deforestation-free products — practical checklist, October 2026

> **Application dates:** 30 December 2026 for large and medium operators, all downstream operators and traders; 30 June 2027 for micro and small operators (established by 31 Dec 2024). Soluble coffee: from 30 December 2027. Cut-off date for deforestation: 31 December 2020.

1. Confirm your products and your role

- ☐ Cocoa in scope: HS 1801 (beans), 1802 (shells, husks, waste), 1803 (paste), 1804 (butter), 1805 (powder), 1806 (chocolate and preparations containing cocoa).
- ☐ Coffee in scope: HS 0901 (green, roasted, decaffeinated, husks and skins). Soluble coffee was added by Delegated Regulation (EU) 2026/2102 and applies only from 30 December 2027.
- ☐ Define your role per product: operator (first places on the EU market or exports), downstream operator or trader. The obligations differ; the 2025 amendment (Reg. (EU) 2025/2650) simplified duties for downstream operators and traders.
- ☐ Check your size class: large/medium companies apply from 30 December 2026; micro and small undertakings (established by 31 Dec 2024) from 30 June 2027.

2. The three conditions (Art. 3)

- ☐ Deforestation-free: produced on land not subject to deforestation after the cut-off date of 31 December 2020.
- ☐ Legal: produced in line with the relevant laws of the country of production (land use rights, environment, labour, human rights, tax, anti-corruption, trade and customs, FPIC where applicable).
- ☐ Covered by a due diligence statement (DDS) submitted in the EU Information System before placing on the market or export.

3. Information to collect per shipment (Art. 9)

- ☐ Product description, trade name, HS code and quantity (net mass).
- ☐ Country of production (Cameroon) and, where relevant, region.
- ☐ Geolocation of all plots of land where the cocoa or coffee was produced: a point (latitude/longitude, 6 decimals) for plots up to 4 ha; a polygon for plots over 4 ha.
- ☐ Date or time range of production (harvest period).
- ☐ Name, postal address and email of the supplier, and of the buyer you deliver to.
- ☐ Adequately conclusive and verifiable evidence that the goods are deforestation-free and legal (e.g. land documents, exporter registration, ONCC export documents, cooperative membership records).

4. Assess and mitigate risk (Art. 10–11)

- ☐ Use the Commission's country benchmarking (low / standard / high risk) — verify Cameroon's current classification on the Commission's EUDR page before each season.
- ☐ Assess supply-chain complexity, risk of mixing with unknown-origin beans, presence of forests and indigenous peoples, and documented concerns.
- ☐ If risk is not negligible: request additional data, commission independent surveys or audits, and do not place the goods until the risk is negligible.

5. Submit, record, review

- ☐ Submit the DDS in the EU Information System (TRACES) and keep the reference number; it must accompany customs declarations.
- ☐ Keep all due diligence documentation for 5 years.
- ☐ Review your due diligence system at least once a year and keep records of the review.

- [ ] Penalties set by Member States can include fines of up to at least 4% of EU annual turnover, confiscation and temporary exclusion from public procurement (Art. 25).

6. Questions to ask your Cameroonian supplier

- [ ] Is the exporter registered with the ONCC (Office National du Cacao et du Café) for the current season?
- [ ] Can you provide plot geolocation (points/polygons) for every farm supplying this lot, in a usable file (GeoJSON/KML/CSV)?
- [ ] How is segregation ensured from farm to warehouse to container — are lots mixed with beans of unknown origin?
- [ ] Which independent inspection body will issue quality and weight certificates before shipment?
- [ ] Will payment be made only by irrevocable L/C, against which documents?

Status as of October 2026, based on Regulation (EU) 2023/1115 as amended by Regulations (EU) 2024/3234 and 2025/2650, Delegated Regulation (EU) 2026/2102 and the Commission's 2026 Guidance. This checklist is general information, not legal advice; the operator placing goods on the EU market remains legally responsible. Sources: environment.ec.europa.eu (EUDR page), trade.ec.europa.eu Access2Markets.

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Cameroon Cocoa & Coffee Harvest Calendar

Typical harvest windows — plan sampling, contracts and EUDR data collection early

	J	F	M	A	M	J	J	A	S	O	N	D
Cocoa main crop	■	■						■	■	■	■	■
Cocoa mid crop				■	■	■	■					
Robusta harvest	■	■									■	■
Arabica harvest	■									■	■	■

Cocoa – main crop	≈ Aug/Sep → Jan/Feb (purchases peak Oct–Dec)
Cocoa – mid crop	≈ Apr/May → Jul
Cocoa – official marketing season	1 August → 15 July (Law 95/11)
Robusta – harvest	≈ Nov → Feb
Robusta – official marketing season	1 December → 15 November
Arabica – harvest	≈ Oct → Jan
Arabica – official marketing season	1 October → 15 September

Harvest months are typical and vary by region and weather; hybrid cocoa increasingly blurs main and mid crop. Sources: ONCC campaign report 2023/24; ICO Cameroon country coffee profile; ICCO feasibility study annex Cameroon.

How DTF Trading Partners works

- ☐ Supplier KYC/KYB · coordination with a licensed Cameroonian exporter
- ☐ Independent pre-shipment inspection (quality and weight)
- ☐ EUDR data per lot: plot geolocation, harvest period, legality documents
- ☐ Payment only by irrevocable documentary L/C under UCP 600 — never advance payment outside banks
- ☐ Start with a sample kit or a trial lot of about 10 MT

DTF Trading Partners SARL is being incorporated in Douala and works through a licensed exporter. We claim no certification, licence or reference we do not hold. All specifications are indicative and subject to independent inspection and contract.

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contact@dtftradingpartners.com · +49 176 62616173 (WhatsApp) · linkedin.com/company/dtf-trading-partners · dtftradingpartners.com