

EUDR SURVEY

EUROPEAN UNION

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Proyecto trazabilidad y sostenibilidad de los productos de exportación

Solidaridad

**From the Origin to the European Market:**

# An Assessment of the Readiness Level of the Cocoa, Coffee and Palm Oil Export Chains regarding the EUDR

**September 2026**





# Solidaridad

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September 2026

This survey was led by Solidaridad and supported by the European Union's technical assistance program, TRACECOL. The analyses presented in this report do not necessarily reflect the official opinion of the European Union. The report's conclusions are the result of a technical assesment based on data collected through the survey and offer a strategic perspective regarding the state of readiness for the EUDR.

These figures represent a sample from a specific set of actors within the national cocoa, coffee, and palm oil supply chains; therefore, they should not be interpreted as representative of the total values or the entirety of those chains.

# Excutive Summary


The European Union (EU) has positioned itself as Colombia's most dynamic trade partner in recent years (2024-2025)[1]. Amid this expansion, non-mining and non-energy exports —which comprise the agricultural, agro-industrial and industrial sectors— experienced significant growth. Among agricultural products, the increase in foreign sales of products such as cocoa, coffee and palm oil stand out[2]. However, sustained access to the European market and the mitigation of trade-exclusion risks for Colombia depend on the country's capacity to comply with Regulation (EU) 2023/1115 (EUDR).

This regulation establishes unavoidable requirements for the aforementioned products and their derivatives to enter the European Union. The requirements focus on demonstrating that the products are free of deforestation after 31 December 2020, comply with the legislation of the country of origin and are covered by a due diligence process. As established by the Regulation, the legal responsibility for the due diligence statement before the European authorities lies with the importer; however, the actors in Colombia assume the critical role of generating and consolidating the technical evidence that underpins the export. In practice, the capacity of local actors to validate their technical and environmental processes turns regulatory compliance into a strategic competitiveness asset.

In order to assess the level of readiness for this regulation among the actors located in the country of origin, Solidaridad Colombia, supported by the European Unión's technical assistance program, applied a consultation instrument to 120 Colombian organizations from the coffee, cocoa and palm oil chains. The study integrated a representative sample of the productive base, associations and processors, as well as exporting companies. The findings confirm a systematic asymmetry in the level of readiness: while exporters lead the transition with significant progress, the origin faces operational lags and technical gaps.

In operational terms, progress in farm geolocation information stands out, while full access to and systematization of legal compliance information presents cross-cutting gaps. In turn, the automation of risk assessment and mitigation is the priority digital challenge for all actors across the three chains. These findings indicate that greater technical capacity and human talent training are required to ensure these gaps do not impede the effective implementation of the EUDR. Nonetheless, addressing these challenges is subject to the availability of financial resources, whose limitation was identified as one of the main obstacles to regulatory compliance, especially in the production base.

To close the identified gaps, strategic guidelines are proposed, aimed both at local links and at public and trade-association entities, whose institutional support is decisive in this process. It is imperative to move towards a governance model based on financial and technical co-responsibility, where sector success depends on shared investment schemes at the origin. Under this approach, exporters and international partners should lead collaborative financing mechanisms that ensure that the productive base not only collects data, but also develops the technical capacity needed to autonomously validate the evidence that the European market demands.

Strengthening collaboration with trade partners in the EU and trade-association entities is essential to articulate all the links of the chain and ensure the inclusion of smallholder producers in a process of continuous learning. This sectoral synergy will make it possible to transform EUDR compliance into a competitive advantage, consolidating Colombia as a global benchmark in the supply of sustainable, deforestation-free agricultural products.


[1] During the 2024–2025 period, the value of exports to the EU grew by 20.6%, outperforming traditional partners such as the Andean Community (9.43%) and Mercosur (2.88%), as well as key markets like Japan (9.2%) and the United States (3.75%) (DANE, 2026). Available on: https://www.dane.gov.co/index.php/estadisticas-por-tema/comercio-internacional/exportaciones

[2] Non-mining and non-energy exports posted a 41.7% increase during this period. Within the agricultural sector, a notable increase was recorded in foreign sales of cocoa beans (35.7%), coffee (80.7%), and palm oil (138%) (Ministry of Trade, Industry and Tourism, 2026). Available on: https://www.mincit.gov.co/mincit_files/mincit/25/256feb0a-e9ac-420b-95fb-93d0a160884e.pdf

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# 1. Introduction

Regulation (EU) 2023/1115 on deforestation-free products (EUDR), framed within the European Green Deal, requires demonstrating that commodities such as coffee, cocoa and palm oil —and their derivatives— are produced legally in the country of origin and are not associated with deforestation after 31 December 2020. The regulation enters into force on 30 December 2026 for general operators and on 30 June 2027 for micro and small enterprises.

Solidaridad Colombia, supported by TRACECOL (a technical assistance program funded by the European Union), conducted a survey of 120 organizations (47 cocoa, 44 coffee, and 29 palm oil) to measure the readiness level of the three supply chains. This report presents a general overview of the findings by actor, aiming to facilitate a concise synthesis for decision-making. For a more in-depth analysis, the sector-specific reports for each chain develop each element exhaustively.

Three specific objectives guide this document: (i) to analyze the level of understanding and operational readiness of the actors in the three supply chains regarding EUDR obligations, (ii) to identify the critical gaps and structural challenges within the sector, and (iii) to propose practical recommendations oriented toward regulatory compliance.

# 2. Key Elements of the EUDR Regulation

The EUDR establishes that commodities such as cocoa, coffee, and palm oil may only enter the European market if they fulfill three core requirements:



1. Be deforestation-free after 31 December 2020.



2. Be legally produced in accordance with the legislation of the country of origin.



3. Be covered by a due diligence statement.

To demonstrate compliance, the supply chain must leverage strict traceability. It is no longer enough to merely know the suppliers; it is essential to obtain the exact geolocation of the plots to enable the satellite monitoring required to prove that the commodities are deforestation-free and have been produced in legally permitted areas.

The success of this process relies on shared responsibility, structured across three core due diligence stages: information collection, risk assessment, and risk mitigation. While the European importer assumes the legal responsibility of submitting the Due Diligence Statement, actors in the country of origin play the critical role of generating, consolidating, and transferring the technical evidence that enables the export.

In practice, the distribution of these operational responsibilities can be structured as shown in Figure 1. It is worth noting that these functions may vary depending on the structural complexity of each supply network.

**Figure 1.** Roles and Responsibilities of Actors within Colombia's Cocoa, Coffee, and Palm Oil Supply Chains regarding the EUDR

| | Level 1<br>**Actor** | Level 2<br>**Actor** | Level 3<br>**Actor** | Level 4<br>**Actor** |
|---|---|---|---|---|
| Cocoa  | Producers | Second-tier organizations | Exporters | Importers (operators in the EU) |
| Coffee  | Producers | Associations / cooperatives | Exporters | Importers (operators in the EU) |
| Palm oil  | Palm growers (núcleos palmeros) | Processors / refiners | Traders / exporters | Importers (operators in the EU) |
|  Responsibilities | • Protect natural forests.<br>• Comply with applicable legislation.<br>• Provide plot geolocation coordinates. | • Ensure product traceability.<br>• Facilitate data collection in the territory.<br>• Support risk analysis execution. | • Consolidate the information supporting due diligence (DD)<br>• Manage the identified risks.<br>• Provide evidence of compliance to the EU importer. | • Maintain due diligence records.<br>• Submit the due diligence statement to the European authorities |

# 3. Methodology and Profile of Respondents

To ensure a comprehensive analysis, the study employed a mixed-methods approach (combining quantitative and qualitative data) through two primary mechanisms. First, a structured online survey comprising 30 questions was administered to assess the level of readiness and identify gaps among various actors regarding EUDR implementation. Second, semi-structured interviews were conducted with key stakeholders to delve deeper into qualitative aspects.

The instrument involved the participation of 120 organizations. Across each supply chain, this sample was distributed as follows:



## Level 1

Cocoa **51%**

**Producers:** These are producer organizations primarily dedicated to cocoa production and commercialization through various market intermediaries.

Coffee **16%**

**Producers:** This group represents the origin of the supply chain. The sample predominantly features medium- to large-sized, formally established farms, contrasting with the general reality of small, informal coffee growers across the country.

Palm oil **65%**

**Palm growers:** These represent the productive and consolidation base at origin, managing direct relationships with farms, primary supply, and initial traceability data.



## Level 2

Cocoa **32%**

**Second-tier organizations:** Represented by regional producer organizations or multiple associations clustered together. They possess a higher level of structuring and formality, operating under a cocoa marketing model that can include direct farm-gate purchasing, supplying aggregated cocoa to exporters, or direct exportation.

Coffee **18%**

**Associations and cooperatives:** Essential stakeholders for product consolidation and a strategic bridge within the supply chain.

Palm oil **14%**

**Processors and refiners:** This group constitutes the oil processing link, responsible for managing the flow of raw material from origin toward the commercialization stages.



## Level 3

Cocoa **17%**

**Exporters:** Companies dedicated to the international trade of cocoa beans, establishing a direct connection with European operators. Participants in this sample account for nearly 70% of Colombia's total exported volume.

Coffee **66%**

**Exporters:** Representing the closest link to European operators. Participants account for 60% of the total volume exported in 2025.

Palm oil **21%**

**Traders / exporters:** Representing the link with a direct connection to international markets and European buyers. Participants account for 45% of the volume exported in 2025.

To analyze the general landscape of the chains and the distribution of responsibilities across all chains, we will refer to these levels throughout the report.[3]

[3] The total sample of 120 organizations ensures a robust confidence margin, considering that the participating exporters represent between 45 - 70% of the volume traded to the EU in the cocoa, coffee and palm oil chains.

# 4. Survey Results: Analysis by Level

The analysis reveals a systematic asymmetry: compliance with and adaptation to the regulation intensify in direct proportion to an actor's proximity to the European market. Level 3 leads the transition, Level 2 advances moderately, and Level 1 faces the most significant lags. The upstream origin represents the primary critical bottleneck, largely due to limited conceptual clarity regarding the scope of the regulation. Without a clear understanding, complete and formalized roadmaps cannot be developed. Consequently, the priority challenge for the production base is to establish systematic processes to capture, validate, and maintain the technical evidence required by the EUDR.

To understand the root causes of this asymmetry and propose strategic recommendations, the following sections assess regulatory adoption, the progress of its operational pillars, structural challenges, and the enabling factors that can facilitate compliance at each level.

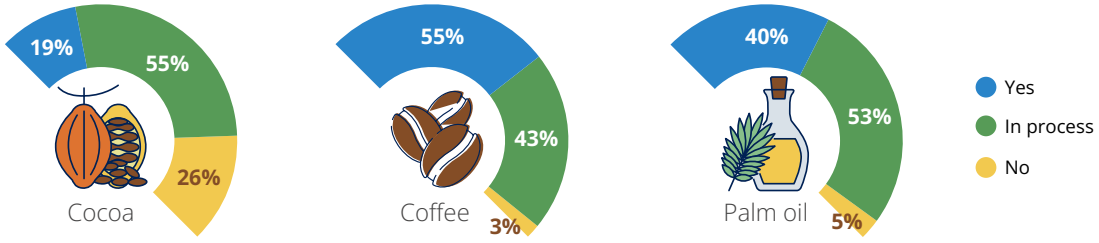


## Level 3 - Exporters and Traders:

### Leadership in Readiness

This level is undergoing an active preparation phase, characterized by progress in internal diagnostics and structured roadmaps—particularly in the coffee and palm oil sectors, given their well-established export-oriented models. However, this process is not yet complete; the critical next step requires the effective integration of strategic planning, resource allocation, and operational execution.

**Figure 2.** Exporters: Integration of EUDR Compliance into Export Protocols and Commercial Contracts



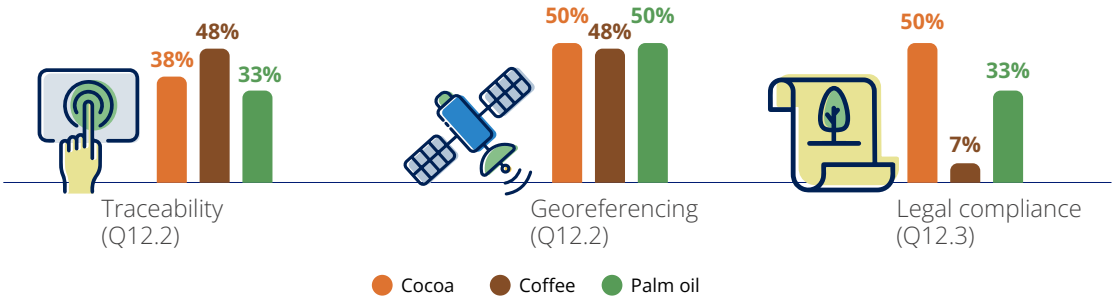

### Operational Progress

Regarding operational performance, the study identified that while this level possesses the capacity to manage information and has made significant efforts toward its systematization, this has not yet translated into fluid data transfer across the supply chain links. Evidence of this is found in the fact that, despite maintaining robust systems to identify farm origin, organizations report low levels of direct access to traceability information: only about a third of those consulted in the palm oil and cocoa sectors, and less than half in the coffee sector, have direct access to this data.

When analyzing geolocation and deforestation assessment, Level 3 shows clear progress in the geographic data collection stage (polygon and plot coordinates) and possesses the technical capacity to carry out deforestation analysis. This confirms that a substantial portion of the responsibility for processing and validating this component falls squarely on this link.

Furthermore, although this level has legal risk assessment frameworks already implemented, data access remains a cross-cutting gap in both the palm oil and coffee sectors. Regarding the most vulnerable themes, the shared difficulty for cocoa and coffee centers on land use rights and free, prior, and informed consent (FPIC); conversely, for palm oil, the most critical aspects involve environmental protection, human rights, and forestry regulations.

**Figure 3.** Complete and Timely Access to Key Information




Additionally, a high proportion of organizations at this level report that they are developing due diligence models. For these processes to be verifiable over time, the systematization of data is indispensable. In this regard, this link demonstrates clear workflows and established internal capacity to manage the information required by the EUDR. However, training needs remain critical: while the coffee sector has narrowed its gap—with only 41% of key personnel lacking training—the need for capacity building is urgent in cocoa and palm oil, where more than 80% of respondents indicate that key staff have not yet completed specific training on the European regulation.

Regarding market communication, approximately 75% of actors in the cocoa and coffee sectors and half of those in palm oil have already received formal information requests from European buyers. This market pressure has driven the implementation of periodic communication mechanisms in nearly half of the cocoa and coffee organizations, and a third of the palm oil firms.

In terms of enabling factors, pre-existing sustainability certifications serve as the primary foundational support—particularly in the palm oil sector, where they received the highest rating—followed by internal organizational capacities. Voluntary sustainability standards have historically fostered robust databases and operational processes that now accelerate adaptation to the EUDR. In fact, organizations' internal institutional strength outweighs the external support currently received from technical assistance programs or trade partners.



## Structural Challenges in Implementation

Regulatory challenges vary significantly by supply chain. In cocoa, financing is the primary obstacle—as the financial burden of compliance represents a hurdle that local actors cannot overcome on their own—followed closely by the technical capacity of their teams. In coffee, challenges are perceived as balanced and moderate across the board (covering financing, digitalization, technical capacity, and traceability), reflecting a process of ongoing systemic adjustment. In palm oil, **digitalization** is the predominant challenge: given its high-volume scale, this supply chain requires a comprehensive technological overhaul, ranging from geographic mapping to full data integration.

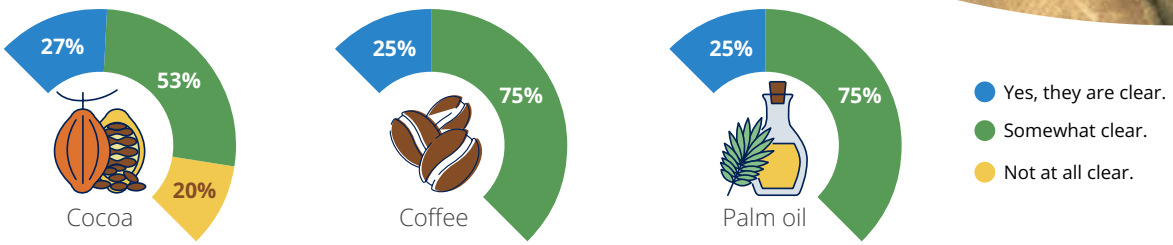
Despite these sectoral differences, all three supply chains agree that automating risk assessment and mitigation is their priority digital challenge, followed by data management, standardization, and integration. Ultimately, the core challenge is not merely collecting the information, but processing it through interoperable digital ecosystems.



## Level 2 - Cooperatives, Associations, Processors:
### Moderate Progress in Readiness

Level 2 organizations are actively working to adopt regulatory guidelines, demonstrating moderate progress in the coffee and palm oil sectors, alongside a slower pace in cocoa. This variation is directly linked to a lack of full regulatory clarity; specifically, 75% of coffee and palm oil organizations, along with 53% of cocoa associations, report only partial clarity regarding their obligations. With this limited understanding, these actors struggle to establish definitive compliance roadmaps or seamlessly transfer data to the next links in the supply chain.

**Figure 4.** Clarity about EUDR Obligations




This comprehension gap is directly reflected in strategic planning. In the cocoa sector, while 40% of organizations have an assessment in progress, an equal percentage still lack a solid initial diagnosis. Conversely, 50% of palm oil organizations and 38% of coffee associations have fully completed their assessments, with both sectors leveraging pre-existing or related diagnostic frameworks. Backed by this data, the coffee and palm oil sectors are currently in an active phase of constructing compliance roadmaps. Cocoa, for its part, needs to further strengthen its planning processes to effectively identify operational gaps and prioritize upcoming investments.

### Status of Operational Progress

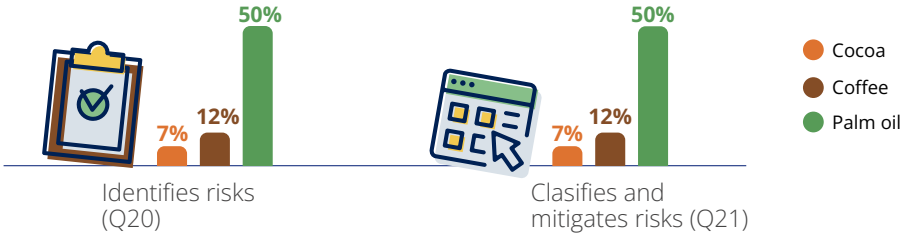
When inquiring about operational progress, a heterogeneous landscape is observed across the board at this level. First, the general capacity to collect and manage the information required by the regulation presents stark contrasts: while the palm oil sector reports that more than half of its organizations have clear processes and technical capacity, this is evident in only a low proportion of coffee and cocoa actors.

These asymmetries are further confirmed in the collection and processing of geographic data. Most organizations in the coffee supply chain have robust systems to track the origin of the product, while half of the palm oil actors have full access to data and the capacity to systematize it. At the same time, both supply chains have a significant proportion of actors with established systems to analyze deforestation alerts. By contrast, this represents a greater challenge for cocoa, which still records limited access to and processing of information.

A common factor at Level 2 is that legal compliance remains a primary obstacle. Although most palm oil organizations indicate the existence of legal analysis systems, all supply chains present reduced ranges in access to information that demonstrates legality. This scenario suggests that strengthening this component is a priority for sectoral articulation, given that these organizations act as the critical bridge in receiving information from the production base for its subsequent delivery to exporters. Regarding the most difficult themes, there is a cross-cutting consensus that the principle of free, prior, and informed consent (FPIC) represents the greatest complexity.

Finally, the divergence is highly pronounced when it comes to due diligence. While half of the actors in palm oil report complete procedures to identify, classify, and mitigate risks, this progress sits below 12% in coffee and cocoa. This significant gap implies that both sectors present critical weaknesses in risk management, which could compromise their compliance validation against EUDR requirements before third parties.

**Figure 5.** Due Dilligence Procedures




In general, operational progress hinges on targeted training: without teams equipped with the necessary knowledge and tools to adopt the core pillars of the regulation, organizations will face greater barriers to implementation. In this regard, Level 2 faces a major challenge, as key personnel who have not yet completed specific EUDR training remain within a high range (75% to 88%). The case of palm oil is particularly notable: while it reports the most advanced compliance systems, half of its personnel have not yet begun this training. This indicates that at this level of the supply chain, tools and procedures have been deployed without fully preparing human talent to manage them.

The survey findings also point to an absence of periodic communication at Level 2, with a high proportion of organizations reporting no formal procedures. This challenge must be addressed in the short and medium term, given that more than half of the organizations in cocoa and palm oil, and nearly a third in coffee, have already received formal information requests from buyers. Consequently, defining standardized communication channels and technical reporting structures is essential.

Finally, palm oil and coffee organizations view pre-existing certifications and their own internal capacities as the primary enablers for advancing readiness. In contrast, for actors within the cocoa supply chain, the technical assistance they receive is positioned as the main driver in this process.

## Structural Challenges in Implementation



Challenges are not uniform across Level 2. The cocoa and coffee supply chains identify **financing** as their main obstacle, suggesting they operate under tight economic constraints that prevent them from assigning dedicated personnel with a specific budget for EUDR readiness. This financial limitation, in turn, restricts investment in data systematization and human talent. As a secondary challenge for both sectors, **technical capacity** emerges as an indispensable structural factor required to translate the regulation into concrete actions.

For palm oil organizations, the challenge is entirely different. **Digitalization** emerges as their greatest challenge: although these actors possess stronger corporate backing, they face the complex task of consolidating large volumes of data from multiple disparate sources. Consequently, this supply chain reports the most critical digital challenges at this level, centered heavily on data standardization, automated risk modeling, and systems integration.

Across the board, platform interoperability and information standardization stand out as the predominant digital challenges for all three supply chains, which are currently constructing fragmented digital ecosystems or "data islands." This challenge is further exacerbated because organizations receive data inputs from Level 1 (the production base) in manual formats or closed, incompatible systems. As a result, Level 2 faces an enormous burden of manual data reprocessing alongside the clear need to establish data governance frameworks that ensure fluid and verifiable traceability toward the European market.



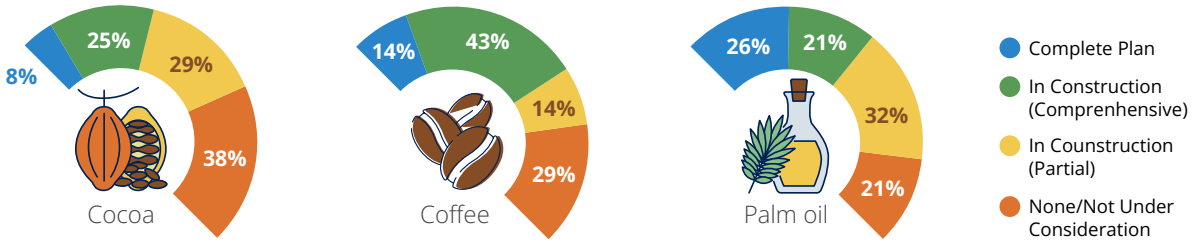
## Level 1 - Producers (including Palm Oil Nucleus):

### The Readiness Challenge of the Producton Base

The transition of the production base toward European regulatory compliance is an ongoing process, representing the link with the greatest lags and structural challenges to achieving full adoption. Rather than total unfamiliarity, a partial understanding of the guidelines predominates at this level, highlighting the clear challenge of translating these regulations into an understanding that aligns the standards of the regulation with local agricultural dynamics.

This lack of clarity is closely associated with a lag in conducting internal assessments. While the majority of cocoa organizations have not yet analyzed their level of compliance, coffee and palm oil actors frequently rely on related or pre-existing processes as alternative diagnostic resources. Despite this lack of formal processes to identify their exact EUDR readiness status, the active development of action plans remains evident across all three supply chains.

**Figure 6.** EUDR Roadmap or Action Plan Status




### Status of Operational Progress

Although Level 1 reports operational progress, it remains the link with the most pronounced gaps across various aspects of the regulation, notably in capturing, validating, and maintaining evidence. Achieving this level of data management at the point of origin is an essential factor for regulatory compliance. In this regard, while more than half of the palm oil and coffee organizations have established systems for physical traceability, only a third of the cocoa supply chain has achieved similar progress.

Geolocation stands out as the dimension with the highest degree of progress at Level 1. Within this area, 79% of palm oil nucleus estates have successfully mapped more than 70% of their farms (with 63% exceeding 90% coverage), while in the coffee sector this progress reaches 72%, and in cocoa, it sits close to half of the organizations. Nonetheless, raw access to this geospatial data does not guarantee its processing; critical limitations persist in the systems used to assess deforestation alerts across all sectors—a challenge that manifests itself most strongly in the cocoa and coffee sectors.

It is relevant to highlight an unprecedented finding in the palm oil supply chain: Level 1 nucleus farms, with 74% complete georeferencing, actually surpass Level 3 traders, who record 50% on this same indicator. This phenomenon, unique among the sectors analyzed, demonstrates that the palm oil origin has developed a data-capture capacity that exceeds its upper links. However, this strength is still incomplete because the technical capacity to process and analyze these polygons through automated systems continues to fall almost exclusively on exporters and processors. Consequently, palm oil's leadership in georeferencing could serve as the primary driver to close the challenge of autonomous environmental risk assessment directly within the territory.

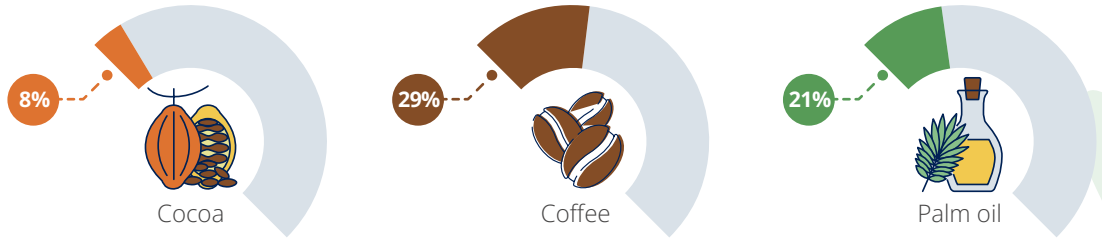
Regarding legality, cocoa and coffee producers exhibit only incipient capacities for information processing. Across all three supply chains, environmental guidelines and forest protection emerge as the most vulnerable themes. Sectoral articulation is key to ensuring that the evidence generated in the territory is consolidated and utilized effectively.

Due diligence requires priority attention. Although more than half of the coffee and palm oil organizations report progress in information systematization, low ranges persist across the board regarding complete procedures to identify, classify, and mitigate risks. Specialized human talent is the key to addressing this lag; however, the specialization of technical personnel is still in its infancy, consolidating as one of the main structural obstacles at this level.

Communication is another factor requiring attention in the near future. The absence of organized channels to transfer reporting standards from Europe to the point of origin restricts the production base's capacity to anticipate information collection. As a result, data standardization and the flow of documentary evidence lag behind the growing information requests from international buyers.

Each supply chain identifies different enablers for integrating the EUDR into its operations. For palm oil nucleus estates and cocoa producers, internal capacities, pre-existing certifications, trade partners, and technical assistance all received ratings within the same range. In this way, their readiness relies simultaneously on an institutional, commercial, and internal network. For coffee producers, meanwhile, although internal capacities represent their greatest strength, the support of trade partners appears as a relevant backing that compensates for the lesser weight of pre-existing certifications in this primary link.

**Figure 7.** Key Staff with Advanced EUDR Training



## Structural Challenges in Implementation

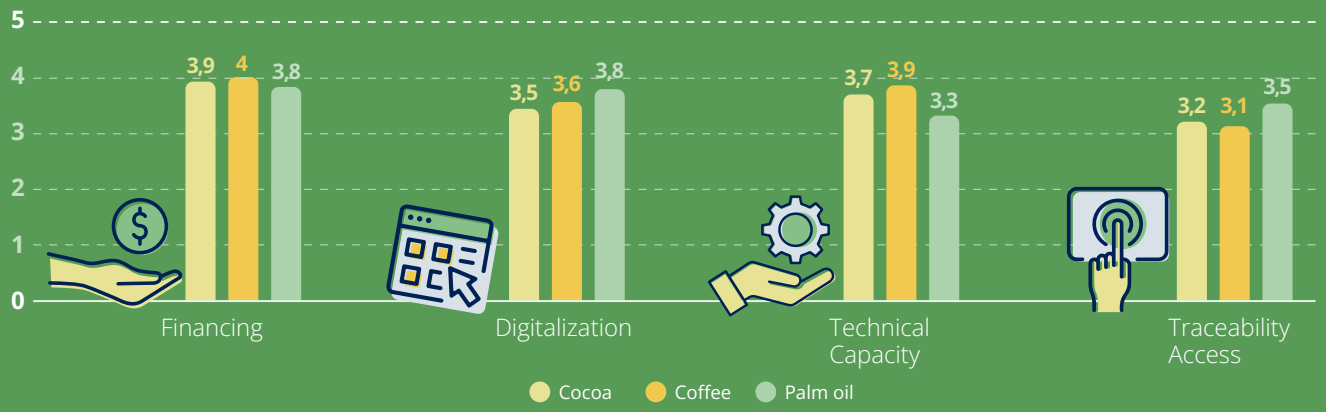


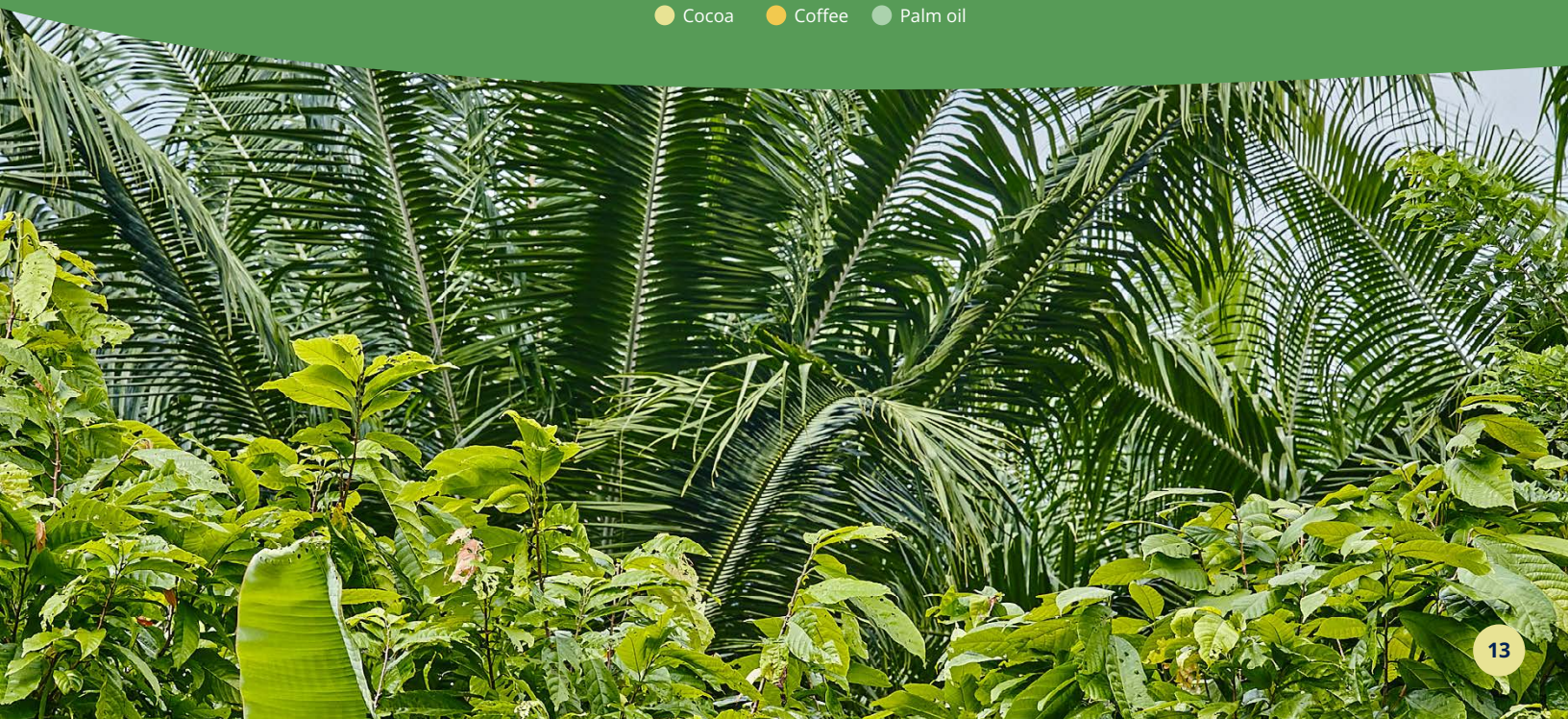
At this link, financing is unquestionably positioned as the most complex challenge. This indicates that resource allocation is a shared structural difficulty requiring priority attention to reduce the gaps that prevent compliance across the production base. In light of lags in human talent and information systematization, coffee and cocoa producers point to technical capacity as their secondary challenge; in contrast, and mirroring Level 2, palm oil actors report digitalization as their most challenging aspect.

Regarding the use of technology, data management and standardization stand out as a common digital challenge, reinforcing the clear need to establish efficient processes given the heterogeneity of information coming from multiple sources. However, to design effective intervention strategies, it is essential to understand the duality of the digital challenge within the production base. For the cocoa and coffee supply chains, the main barrier lies in digital literacy and basic data systematization by field teams. Conversely, for the palm oil sector, the challenge is no longer initial adoption, but rather the sophistication and automation needed to process large volumes of data and assess deforestation risks at scale and with high efficiency.

Regardless of the nature of these obstacles, there is an almost unanimous interest in receiving technical or organizational support across all three supply chains without distinction. This demonstrates the strong will and commitment of the production base to overcome these challenges and consolidate itself as a fundamental, compliant level within the EUDR integration framework.

**Figure 8.** General Challenges (Average Scale 1-5)



# 5. Key Conclusions

The survey demonstrates that the cocoa, coffee, and palm oil supply chains in Colombia have already covered significant ground in integrating the requirements of the regulation—particularly at the exporter level—and that the country possesses genuine potential to fully realize the implementation of these operational pillars across every tier of the supply chain.

## Five Messages Synthesize the Findings:

**Finding** | **Messages**



**Readiness**

### 1. Systematic Asymmetry in Readiness

There is a direct correlation between an actor's proximity to the final market and their level of regulatory readiness. While Level 3 (exporters) leads the transition with structured roadmaps and due diligence systems already underway, Level 1 (the production base) presents the most significant structural lags, driven mainly by challenges in financing and a lack of technical clarity.



**Operational Progress**

### 2. Supply Chain Articulation

The most critical challenge is not an absence of data, but rather the lack of effective articulation between levels. A clear disconnect in the information flow remains evident: those who ultimately consolidate the compliance evidence (exporters) do not always have fluid access to the data generated and validated directly within the territory by associations and producers. Consequently, successful implementation depends entirely on connecting these levels through a bidirectional, organized, and collaborative framework.

### 3. Legality: A Common Operational Gap

Unlike geolocation—which shows significant progress, particularly in the palm oil and coffee sectors—compliance with the legislation of the country of origin presents information gaps across all levels. While there is clear awareness of this challenge, internal capacity to systematically compile and maintain the required legal evidence remains incipient.

### 4. Early Information Requests from European Buyers

The European market has already begun issuing data requests related to the EUDR ahead of the regulation's formal entry into force. Currently, more than half of the surveyed organizations have already received formal information requests from their buyers. This ongoing pressure underscores the clear challenge of moving from a reactive response toward an adaptive management strategy built on anticipation and shared responsibility.



**Structural Challenges**

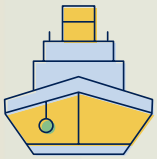
### 5. The Duality of the Digital Challenge: Human Talent and Technology

Digital barriers present an entirely different nature depending on the supply chain:

- **For the cocoa and coffee sectors:** The priority centers on training personnel in the territory on basic information systematization and the widespread adoption of digital tools.
- **For the palm oil sector:** The challenge lies in the sophistication and automation of systems required to process large volumes of data and assess deforestation risks efficiently at scale.

Across the board, a lack of interoperability and the fragmentation into "data islands" stand out as the primary technological challenges for all three supply chains. Without standardized protocols that allow computer systems to communicate with one another, the flow of due diligence data stalls, generating cost overruns and heavy manual reprocessing between links.

# 6. Strategic Recommendations



## For Level 3 - Exporters and Traders:

- **Design of Collaborative Financing Models:** Promote support schemes, strategic partnerships, or commercial incentives that enable the production base to overcome significant economic barriers and address the lack of specialized personnel.
- **Long-Term Commercial Agreements:** Foster long-term contracts between exporters and European buyers that guarantee the purchase of agricultural products in exchange for meeting progressive sustainability targets. This commercial stability provides exporters and their suppliers with the financial security needed to invest confidently in technology and specialized talent.



## For Level 2 - Cooperatives, Associations, Processors:

- **EUDR Knowledge Multipliers:** Given this level's close relationship with the production base, implementing initiatives to build internal capacity for training and technical support can effectively address the lack of regulatory clarity currently affecting Level 1.
- **Catalysts for Joint Action Plans:** With a significant portion of organizations currently constructing their compliance plans, finalizing them requires structured technical assistance programs. These programs must be grounded in the operational realities of Levels 1 and 2, particularly regarding data and information management.



## For Level 1 - Producers (Including Palm Oil Nucleus Estates):

- **Financing Schemes at the Point of Origin:** Financing represents a major challenge and stands as the top support priority at this level. Consequently, any sectoral intervention lacking a financial component fundamentally underestimates the critical structural barriers identified by the actors themselves.
- **Scaling Up Digital Technical Assistance:** To address the challenge of a shortage of specialized personnel, it is recommended to strengthen the use of digital rural extension tools. These tools enable producers to learn about the practical implementation of the regulation on the ground, and can be highly complemented by targeted, in-person training sessions led by Level 2 organizations.



## Public and trade-association entities

- **Inter-Institutional and Trade-Association Coordination:** Establish a multi-stakeholder framework co-led by the public and private sectors with a strong trade-association focus. This approach directly responds to the fact that the vast majority of sector actors view collaborative work as vital and express a clear interest in receiving support to develop technical capacities.
- **Establishment of Protocols for Technical Interoperability:** It is imperative that public entities and trade associations lead the definition of standardized data formats rather than imposing a single technological tool. This digital governance framework, supported by open application programming interfaces (APIs), will facilitate seamless communication across the diverse digital ecosystems of cooperatives and exporters. By systematically integrating geolocation and legality evidence, data barriers can be dismantled, ensuring an efficient, automated due diligence flow from the ground level to the European market.

- **Support for Legal Risk Management as a Cross-Cutting Priority:** All three supply chains identify legal compliance as one of the most complex components to implement. Although the recently published legality guides for the three sectors provide excellent clarity on the applicable Colombian legal framework under the EUDR—alongside practical steps for legal due diligence—it remains crucial to translate these guides into practical, field-level exercises.
- **Institutionalization of Training Spaces:** Establish permanent training programs led by trade associations and commercial partners to transfer reporting standards and technologies applied to sustainability. The objective is to ensure that the production base not only collects data but also possesses the technical knowledge to validate it and maintain the evidence required by international buyers. This knowledge transfer should include specific modules on managing deforestation alerts and consolidating national legality documentation.

The path towards EUDR compliance is a window of opportunity for Colombian agricultural sustainability. However, its materialization is conditioned on a structural intervention that recognizes the particularities of each link and chain, promoting governance based on co-responsibility.

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