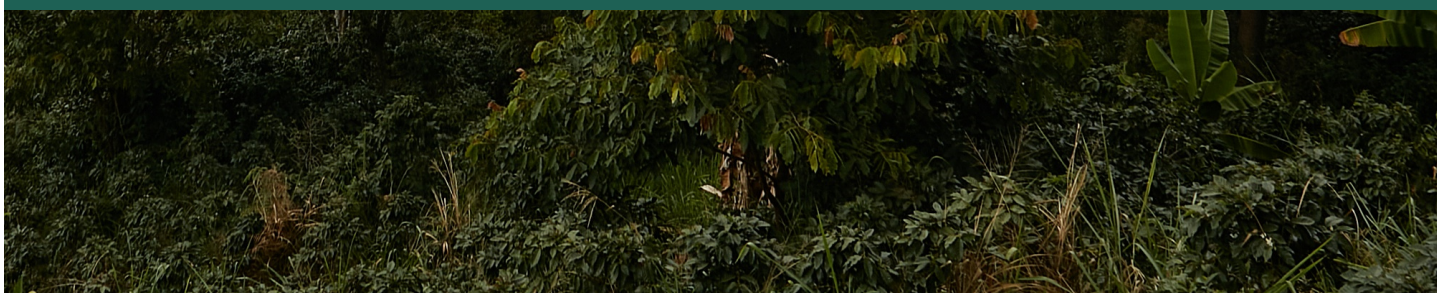




Regulation for 4C certified EUDR Coffee

Version 1.0



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Document Title: Regulation for 4C certified EUDR Coffee

Version 1.0

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Abbreviations

AU	Annual Update
BP	Business Partner
BPM	Business Partner Map
CB	Certification Body
EU	European Union
EUDR	European Union Deforestation-free Regulation
FAO	Food and Agriculture Organization
FB	Final Buyer
FPIC	Free Prior Informed Consent Process
GRAS	Global Risk Assessment Services
IB	Intermediary Buyer
IMS	Internal Management System
ME	Managing Entity

1 Introduction

4C is an independent, stakeholder-driven, internationally recognized certification system for the entire coffee sector, aiming at anchoring sustainability in coffee supply chains across environmental, social, and economic dimensions. The 4C system is a voluntary certification scheme, which provides assurance towards sustainability goals for companies to use for their responsible sourcing and communication to the consumer market.

4C System

However, beyond voluntary certification and assurance systems, the European Union (EU) now requires mandatory and specific information to import coffee and other commodities e.g. cocoa to or export from the EU market under the new regulation on deforestation-free products (EU No 995/2010; EUDR¹).

Mandatory information

According to the EU Commission, deforestation and forest degradation are occurring at an alarming rate, aggravating climate change and the loss of biodiversity. The main driver of deforestation and forest degradation is the expansion of agricultural land to produce commodities such as cattle, wood, palm oil, soy, cocoa, coffee, or natural rubber. A growing world population is expected to increase demand for agricultural land and put additional pressure on forests, amplified by the effects of climate change.

Driver for deforestation

The EU is a relevant consumer of commodities associated with deforestation and forest degradation. Consequently, the EU with the newly developed EUDR aims to reduce its negative footprint by avoiding trades of products related to deforestation and degradation, requiring additional information from trade operators for the below-mentioned commodities and derivatives into the EU market and out.

Deforestation-free production

1.1 EU Regulation on deforestation-free products

To place products on the EU market or export from it, the following conditions are to be fulfilled (Article 3):

EUDR requirements

- ✓ They are deforestation-free.
- ✓ They have been produced in accordance with the relevant legislation of the country of production.
- ✓ They are covered by a due diligence statement.

¹ REGULATION (EU) 2023/1115 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on the making available on the European Union market and the export from the European Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010.

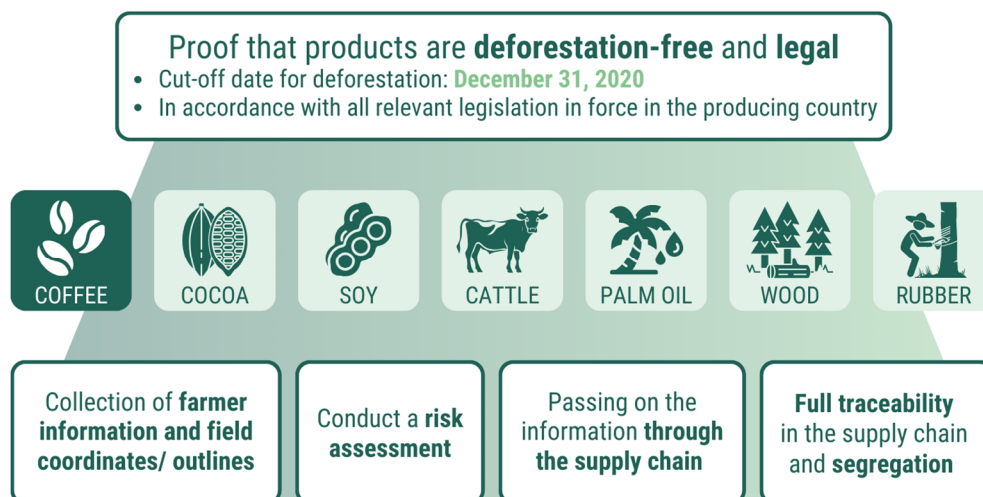


Figure 1: Overview of EUDR scope and requirements

To prove the compliance with the above-mentioned requirements, operators, i.e., companies that place relevant commodities on or export from the EU market, shall exercise due diligence. This includes the collection of information on the product, on the geolocation of plots of land where produced, on the deforestation-free production, on the legality of production of the commodity, as well as risk assessment measures and risk mitigation measures.

Due Diligence

Ensuring the full traceability of commodities back to the plot of land of production and the deforestation-free production requires segregation from commodities of unknown origin or non-deforestation-free commodities.

Traceability and Segregation

Based on the due diligence exercised, operators shall submit a due diligence statement to the information system run by the EU Commission. By making the due diligence statement available to competent authorities, the operator assumes responsibility for the compliance of the relevant product with the requirements of the EUDR. Operators shall keep records of due diligence statements and related information for five years from the date the statement is made available to the information system.

Due diligence statement

Due diligence statements and corresponding information are subject to checks on compliance by the national competent authorities which can result in further in-depth analysis, requirements for corrective actions or penalties in case of non-compliance.

Check by competent authorities

1.2 The implementation of the EUDR

The EUDR entered into force on the 29th of June 2023 and will be applied as of the 30th of December 2024, requiring EU importing and exporting operators to have a due diligence system in place. Operators are then obliged to follow the EUDR requirements and to be ready to provide information about the entire supply chain for coffee from the moment of EU-import back to its origin, once requested by the member state authority. Operators categorized as SMEs are granted an additional 6-month transition period and need to comply from 30th of June 2025 with the EUDR requirements.

Implementation of EUDR

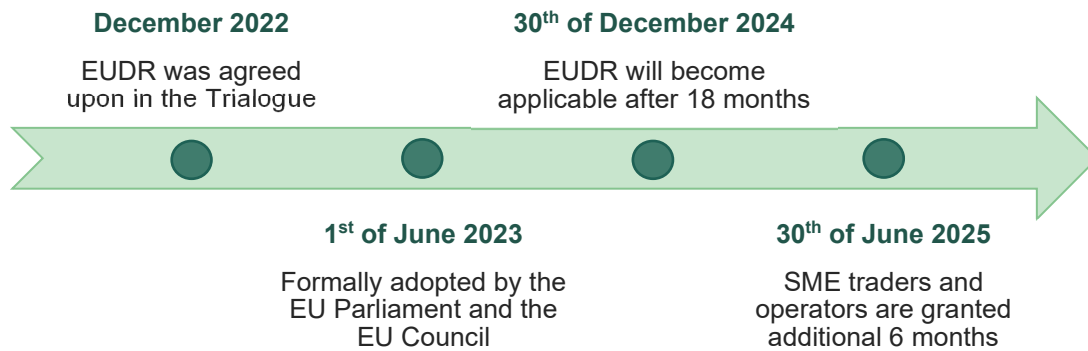


Figure 2: Timeline for EUDR implementation

2 Objectives and scope

2.1 Objectives

The objectives of this regulation are:

- To provide the framework for 4C System users under the scope of coffee production to adapt to the requirements of the EUDR and to support them to export EUDR compliant coffee to the EU market.
- To harmonize the 4C System with the EUDR requirements.
- To advise the 4C System users how to proceed complying with both, the 4C and the EUDR requirements.

*Framework 4C
and EUDR*

This regulation establishes the concept of '4C certified EUDR Coffee', the application of which is subject to an annual fee by the Managing Entity (ME) of the 4C Unit.

*'4C certified EUDR
Coffee'*

4C certified coffee and 4C certified EUDR Coffee are not identical. However, all requirements and regulations as outlined in the 4C Code of Conduct v.4.1 and the 4C System Regulations v.4.0 are also valid for 4C certified EUDR Coffee. Amendments are made with regards to the cut-off date for deforestation required under EUDR, 31st of December 2020, which shall be adhered to in addition to 4C's cut-off date, 1st of January 2006. The forest definition of EUDR, based on FAO, shall be applied to this additional cut-off date of 2020. Further, providing polygons as reference of coffee plots equal to or larger than four hectares in size for proof of deforestation-free coffee production is mandatory. Therefore, specific adaptations to the 4C System have been conducted to harmonize the requirements and to become fully aligned with the EUDR.

*Adaptations
4C/EUDR*

These adaptations are outlined in this regulation to be used by relevant actors of the coffee supply chain. Specific adaptations entail:

*Adapted
documents*

- Adding terms and definitions in accordance with the EUDR.
- Adapting requirements of the 4C Code of Conduct v.4.1 and the 4C System Regulations v.4.0.

This regulation has been developed based on the EUDR, the officially published FAQ on EUDR by the EU² as well as information from different stakeholder meetings. Provided that further information and specifications are published by regulatory authorities, we reserve the right to make changes to the regulation at short notice.

Reference to EUDR

This regulation is to be seen as a mandatory framework for achieving compliance with the EUDR. Fulfilment of this regulation does not substitute the obligations of the operator, i.e. importing or exporting companies, as outlined in the EUDR, Article 4.

Liability

2.2 Scope

4C certified coffee, which is being exported from a producing country and potentially imported into the EU, is subject to this regulation. Therefore, all coffee plots which are part of a certified 4C Unit, the respective Business Partners (BPs), being the Producers and Service Providers of the 4C Unit, as well as the ME, are included in the scope of this regulation.

4C certified coffee to EU

The application of this regulation is voluntary for MEs in 2024. From 1st of January 2025 all MEs need to be 4C certified EUDR Coffee compliant, therefore the deadline to submit all required documents to 4C is the 30th of September 2024. Furthermore, this regulation is also valid for the Certification Bodies (CB) in charge of 4C certification. The requirements of this regulation shall be followed by the CB within the default auditing cycle of 4C certification.

Application

The ME is responsible to ensure compliance with and the implementation of the requirements of the 4C Code of Conduct and the 4C System Regulations. Specific requirements have been adapted to ensure alignment with the EUDR requirements prior to coffee entering the supply chain for export to the European Union.

ME's responsibility

All terms, definitions, and requirements stated in this regulation are mandatory, unless stated otherwise.

Terms and definitions

The following table provides an overview of the relevant documents to which this regulation refers to and to which adaptations have been made.

Reference documents

² https://environment.ec.europa.eu/system/files/2023-06/FAQ%20%20Deforestation%20Regulation_1.pdf

4C System documents (normative)
<p>4C Code of Conduct 4C principles and criteria for the production, processing, and trading of green coffee beans.</p>
<p>4C System Regulations Relevant aspects and requirements of the 4C System, including general rules according to which the 4C System is governed, its internal structure and the requirements for 4C certification which need to be applied by all participants of the 4C System. Furthermore, requirements regarding the trading of 4C certified coffee and the 4C communication guidelines are described.</p>
4C templates and checklists based on the 4C System documents
<p>Business Partner Map (BPM) Tool for Managing Entities (MEs) to collect the basic required data of its Business Partners (BPs).</p>

Table 1: Relevant documents of 4C System

The key changes of 4C certified EUDR Coffee compared to the 4C core certification are summarized in the following table.

Key Changes

Chapter	Change	Reference to 4C System
4	Applying forest definition of EUDR for additional cut-off date	4C Code of Conduct v.4.1, Principle 3.1
5.1	Additional cut-off date for deforestation, 31 st of December 2020	4C Code of Conduct v.4.1, Principle 3.1
5.2	Requirement on polygons for coffee plots equal to or larger than 4 ha	4C Code of Conduct v.4.1, Principle 1.1
5.2; 6.1.1	Immediate availability of geolocation of 100% of coffee plots of BP Producer	4C System Regulations v.4.0, Chapter 5.3.2
6.1	Conduction of standardized deforestation check before coffee is purchased from BP Producers	-
5.3	Provision of Self-Declaration on Legality	-
5.5	Indication of time range of production by ME in Commercial Reporting	4C System Regulations v.4.0, Chapter 9.1

Table 2: Key changes

3 Effective and validity dates

- Approval date: 09th of January 2024
- Publication date: 10th of January 2024
- Effective date: 10th of January 2024
- Period of validity: 10th of January 2024 – 30th of June 2025 (or until the end of the transition period of the revised 4C Code of Conduct v.5.0, if needed)

Effective and validity dates

4 Terms and definitions

The following terms and definitions shall be applied in the context of this regulation. With exceptions where indicated, the definitions are taken from Article 2 of the EUDR.

*Applicable terms
and definitions*

- **Cut-off date(s):**

The cut-off date for EUDR conform coffee is set for the 31st of December 2020, for plots of land where coffee is growing and after which deforestation on the same plot of land is not permitted, applying the forest definition below. However, 4C certification still demands the cut-off date of 1st of January 2006 with regards to primary forest and protected areas for the total farm area to be eligible to become 4C certified.

NOTE: Definition as per alignment of 4C Code of Conduct v.4.1 and System Regulations v.4.0 with EUDR, Article 2 (Definitions).

Both cut-off dates are being used in this regulation and specified (see chapter 5.1).

- **Deforestation:**

means the conversion of forest to agricultural use, whether human-induced or not.

- **Deforestation-free:**

Relevant products contain, have been fed with, or have been made using relevant commodities that were produced on land that has not been subject to deforestation after the 31st of December 2020.

- **Due Diligence statement:**

According to EUDR, operators (Intermediary Buyers (IB) or Final buyers (FB) in terms of 4C) placing relevant products on or exporting from the EU market are obliged to submit a due diligence statement, declaring compliance with Article 3 of the EUDR, to the information system set up by the EU Commission. This information system will support the operators and the competent authorities of the EU member states in presenting and accessing the mandatory information.

NOTE: Definition as per alignment of 4C Glossary with EUDR Articles 2 and 4.

As stated in the EUDR, Article 25, non-compliance with the requirements of the EUDR can lead to fines proportional to their infringements to the Member State authority; in the case of a legal person, the maximum amount of such a fine shall be set at least at 4 % of the operator's or trader's total annual Union-wide turnover in the fiscal year preceding the fining decision.

- **Forest:**

Forest is defined as land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10 percent, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agriculture or urban use.

NOTE: Original definition by FAO (2006).

- **Forest degradation:**

means structural changes to forest cover, taking the form of the conversion of:

(a) Primary forests or naturally regenerating forests into plantation forests or into other wooded land

or

(b) Primary forests into planted forests.

NOTE: In the case of planting coffee trees under any kind of forest under the forest definition, this counts as land use change and excludes coffee harvested from this area from being certified under 4C.

- **Geolocation:**

means the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits; For plots of land of more than four hectares used to produce the relevant commodities other than cattle, this shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land.

- **Legality:**

'Relevant legislation of the country of production' means the laws applicable in the country of production concerning the legal status of the area of production in terms of:

(a) Land use rights

(b) Environmental protection

(c) Forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting

(d) Third parties' rights

(e) Labour rights

(f) Human rights protected under international law

(g) The principle of free, prior, and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples

(h) Tax, anti-corruption, trade, and customs regulations.

- **Plot of land:**

means land within a single real-estate property, as recognized by the law of the country of production, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land.

NOTE: In the 4C Glossary the corresponding term is 'field/plot', which is the area of coffee cultivation, synonymously used as 'coffee plot', and needs to be included in the BPM with its respective geolocation.

5 Requirements for '4C certified EUDR Coffee'

All requirements and regulations as outlined in the 4C Code of Conduct v.4.1 and 4C System Regulations v.4.0 are also valid for 4C certified EUDR Coffee, unless stated otherwise in this regulation.

Validity of 4C System

Adaptations have been made to the level of the terms and definitions for forests and to the requirements of geolocations and verification of coffee plots, which overrule respective existing requirements or add to those (see chapters 5.1 and 5.2). In addition to the requirements under the 4C core certification for legality, traceability, and commercial reporting (see chapters 5.3, 5.4, and 5.5), some specific requirements are introduced in this regard under the 4C certified EUDR Coffee.

Mandatory adaptations

5.1 No deforestation

To adapt the 4C System to the EUDR requirements, the 4C requirement for no deforestation in the Environmental Dimension of the 4C Code of Conduct v.4.1 is amended by the following additional checkpoint:

Cut-off dates

Principle 3.1: Protection of Biodiversity and High Carbon Stock Areas		
Criteria 3.1.1		
Primary forests and protected areas are protected		
Check-point relevant for: BP Producers		Level
4C certified coffee	4C certified EUDR Coffee	1
<ul style="list-style-type: none"> There is no cutting, destruction, or conversion of primary forests and protected areas into coffee plantations since the 1st of January 2006 	<ul style="list-style-type: none"> There is no cutting, destruction, or conversion of primary forests and protected areas into coffee plantations since the 1st of January 2006 and there is no cutting, destruction, or conversion of forests³ into coffee plantations since the 31st of December 2020. 	

Table 3: Adaptation Criteria 3.1.1 of 4C Code of Conduct

5.2 Geolocation

In accordance with the 4C System Regulations Chapter 4.3, the Internal Management System (IMS) is the core element of the 4C Unit and includes a complete and updated Business Partner Map (BPM). The BPM template requires the geolocation of the coffee plots of BP Producers, which is also reflected in the checkpoint relevant for MEs under the Economic Dimension of the 4C Code of Conduct v.4.1. To align with the EUDR, this checkpoint is now further specified.

Requirements on geolocations

Principle 1.1: Business Management		
Criteria 1.1.1		
An Internal Management System is implemented		
Check-point relevant for: Managing Entities		Level
4C certified coffee	4C certified EUDR Coffee	1
<ul style="list-style-type: none"> Geolocation is available for 100% of the coffee plots of BP Producers 	<ul style="list-style-type: none"> Geolocation is available for 100% of the coffee plots of BP Producers and Polygon (geolocation) is available for 100% of the coffee plots equal to or larger than 4 ha 	

Table 4: Adaptation Criteria 1.1.1 of 4C Code of Conduct

³ Applying the above-mentioned definition of forest.

For the geolocation to be specific the requirements are:

- **For 100% of plots of land smaller than 4.0 hectares:** point coordinates with at least six decimal digits for longitude and latitude shall be made available and provided in the BPM from the outset. The point shall be taken in the estimated centre point of the coffee plot.
- **For 100% of plots of land of equal to or larger than 4.0 hectares:** a polygon with sufficient latitude and longitude points to describe the perimeter of the plot of land shall be made available from the outset as well. This information shall be provided in a separate file (e.g., shapefile, geojson, kml, geopackage) clearly linked to the farm name indicated in the BPM for the respective plot of land and in cases with duplicated farm names additionally linked to the national ID of the respective BP Producer.

*Point
coordinates*

Polygons

5.3 Legality requirements

Criterion 1.1.3 of the 4C Code of Conduct requires that all applicable regional and national laws and regulations are complied with by the ME as well as the BPs. More specific requirements with regards to legality topics are addressed by checkpoints in each dimension (economic, social, and environmental) and verified by third party auditing.

*Compliance with
laws and
requirements*

The EUDR requires information that the commodity, here coffee, has been produced in accordance with the relevant legislation of the country of production, as defined under the term 'Legality' in Chapter 4 of this document. Therefore, under this regulation, the ME as the administrator of the producer group is required to provide a Self-Declaration on legality (Annex II) every time a new BPM is submitted to 4C.

Self-Declaration

5.4 Traceability requirements

As required and described in Chapter 8.1 of the 4C System Regulations v.4.0, physical segregation is the only traceability model allowed within the 4C Unit. The ME of a 4C Unit can only trade 4C certified coffee produced by and bought from the registered BPs of the 4C Unit. Therefore, all coffee plots of the BP Producer from which coffee is sold to the ME need to be registered in the BPM. It is the responsibility of the ME to ensure full traceability within the 4C Unit which will be verified during 4C audits.

Traceability

For the coffee to become 4C certified EUDR Coffee compliant, beyond all current requirements of 4C, the plots of land need to be checked and confirmed by 4C as deforestation-free prior to any coffee entering the supply chain of the 4C Unit.

*Deforestation-
free*

When including new BP Producers in the 4C Unit, this regulation adds to the requirement described in Chapter 6.1 of the 4C System Regulations v.4.0. BP Producers can only sell 4C certified EUDR Coffee to its respective ME once the BPM in which they have been included was verified as deforestation-free.

Adding new BPs

5.5 Commercial reporting

In accordance with Chapter 9 of the 4C System Regulations v.4.0, traded volumes of 4C certified coffee need to be reported in the 4C Portal. As the first vendor in the supply chain selling 4C certified coffee, MEs shall report the amount of 4C certified coffee they are purchasing from their 4C Unit into the 4C Portal.

Commercial reporting

For 4C certified EUDR Coffee, in addition to the required information for purchases, the ME shall provide the time range of production of the related batch of coffee.

Time range of production

All transactions of 4C certified coffee by actors in the 4C supply chain, from the ME via IBs (processing, traders, warehouses, etc.) to FBs (roasting and blending) shall be recorded in the 4C Portal.

Recording in 4C Portal

6 Process for becoming 4C certified EUDR Coffee compliant

To fulfil the requirements for 4C certified EUDR Coffee, MEs need to follow the process described below. Furthermore, it is specified how the process for 4C certified EUDR Coffee is integrated in the certification cycle of the 4C core certification.

6.1 Process for ME to comply with 4C certified EUDR Coffee

All 4C Units certified or in the process of certification under the 4C System shall comply with 4C certified EUDR Coffee requirements with valid confirmation from 4C as of the 1st of January 2025. Therefore, all MEs with a currently valid 4C certificate or in the process of 4C certification shall implement the following steps with the latest submission of documents (EU.1.4) to 4C by the 30th of September 2024 to become 4C certified EUDR Coffee compliant in time by 1st of January 2025.

Mandatory application of 4C certified EUDR Coffee

All requirements for MEs and 4C Units to become 4C certified as outlined in the 4C System Regulations v.4.0 must always be followed.

4C requirements remain valid

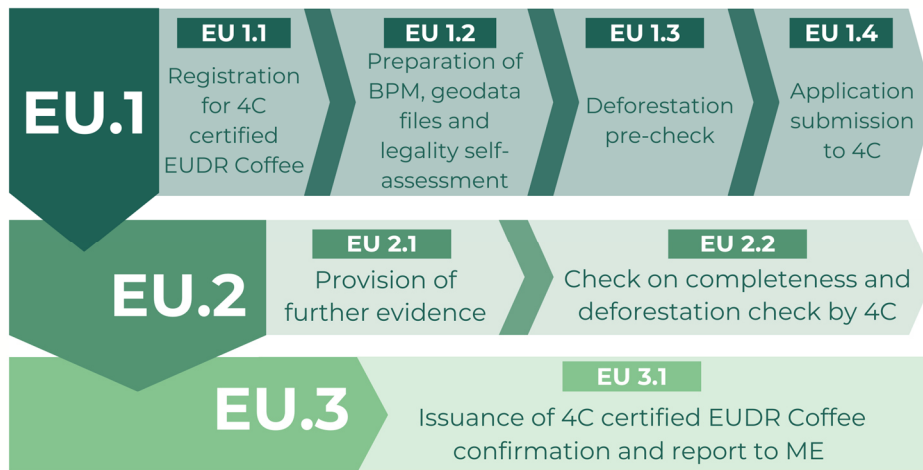


Figure 3: Step-by-Step for ME to become 4C certified EUDR Coffee compliant

6.1.1 EU.1: Preparation by ME

Registration of the ME (EU.1.1)

To become 4C certified EUDR Coffee compliant, the ME shall register on the 4C Portal to gain access to the respective assessment services.

Register at 4C

The ME shall organize and prepare the 4C Unit to comply with 4C certified EUDR Coffee requirements. In addition to the common requirements for the 4C core certification, the ME shall check legality requirements of all BPs, assess the risk of deforestation, and prepare the BPM as well as geodata files (polygons) for coffee plots equal to or larger than 4.0 hectares.

Prepare 4C Unit

BPM preparation and update (EU.1.2)

The BPM is a tool that enables MEs of 4C Units to manage the data and performance of individual BPs. The BPM is an excel sheet, in which MEs fill in the basic data of BPs (Name, ID, residential or postal location (municipality and state), and geolocation of each coffee plot and facility). The BPM template is publicly available on the [4C website](#). A guidance sheet on how to correctly fill in the BPM is included in the BPM excel sheet template.

BPM requirements

For 4C certified EUDR Coffee, point coordinates of 100% of the coffee plots registered in the BPM and all mandatory basic business information of all BPs must be available prior to the certification and prior to include any BP into the 4C Unit. This differs from and will overrule the period of 12 months, which is currently granted under the 4C core certification, counting from initial certification until the first Annual Update (AU1), to provide geolocation of 100% of the coffee plots.

Immediate completeness

The ME can upload the BPM to the [BPM Upload and analysis tool](#) as many times as needed, to check and confirm the correctness of geolocations of coffee plots. The BPM shall be updated each time there are adaptations made to the data of BPs (geolocation, farm size, include/exclude coffee plots,

BPM Update

include/exclude facilities, etc.) and/or a change to the composition of the 4C Unit (include/exclude BPs).

To become certified under the 4C System, MEs of 4C Units shall complete the BPM before applying for a 4C core audit.⁴ MEs with a valid 4C certificate shall use the latest validated BPM by the CB and 4C as a basis for the 4C certified EUDR Coffee process. MEs shall always keep their BPMs up to date.

*Latest validated
BPM*

Polygon collection (EU.1.2)

For all coffee plots equal to or larger than 4.0 hectares, the respective polygons need to be provided in a separate file (geodata file) in addition to being listed in the BPM. The polygon information shall be clearly linked to the farm name indicated in the BPM for the respective plot of land and in cases of duplicated farm names additionally linked to the national ID of the respective BP Producer.

Geodata file

In parallel to the update of the BPM as required under step EU.1.2 – BPM Preparation and Update, the polygon information of any new/adjusted coffee plot shall also be updated immediately. The [BPM Upload and analysis tool](#) may be used to identify all coffee plots registered in the BPM with an area equal to or above 4.0 hectares and to check if all of these coffee plots have polygon information available.

*Updating
polygons*

Geolocation data may be collected via:

- (a) Mobile devices with suitable applications, such as [FARAMO](#) or Google Maps. FARAMO is a tool provided by Global Risk Assessment Services (GRAS), service provider of 4C.
- (b) Remote caption of geodata (point coordinates and polygons) with satellite image tools, such as Google Earth.

*Tools for
geodata
collection*

In addition, land registry systems by national authorities can be used as reference if georeferenced data is available. A more detailed guidance for the ME on how to collect geodata and prepare for the EUDR compliance can be found on the 4C website.

*Guidance
geodata
collection*

Legality Self-Assessment (EU.1.2)

The ME shall assess the legality⁵ of all BPs, workers of MEs and BPs, as well as facilities and coffee plots registered in the BPM of the 4C Unit. The Self-Assessment in Annex I can be used as a tool by the ME to understand the risk of non-compliance to national laws and regulations of their 4C Unit. After a thorough evaluation, the ME shall fill out and sign the Self-Declaration (Annex II) confirming the legality of the coffee production.

*Self-Assessment
and Self-
Declaration*

*Self-Declaration
submission*

⁴ 4C core audits include (re)certification, addendum, and surveillance audits.

⁵ As defined in chapter 4.

The Self-Declaration shall be uploaded to the 4C Portal to complete the application of the ME for 4C certified EUDR Coffee and is required every time a new BPM is submitted to 4C.

Deforestation-free production pre-check (EU.1.3)

To assess the deforestation-risk the ME can upload the BPM and the geodata files to the [BPM Upload and analysis tool](#) on the 4C Portal. Each time there are changes in the composition of the 4C Unit or to the data of the BPs (geolocation, farm size, include/exclude coffee plots, include/exclude facilities, etc.), the updated BPM and geodata files shall be uploaded again to repeat the assessment on deforestation-free production.

Upload BPM and geodata file

The geolocations are being evaluated in a standardized process against an underlying national forest map with the cut-off date of 31st of December 2020 to assess potential deforestation. In case of an alert caused by any potential or actual overlap with deforestation information, this is indicated in the [BPM Upload and analysis tool](#).

Verification of deforestation

The ME shall then assess the alert and provide the root cause to 4C. The ME has the responsibility to collect and provide additional information (e.g., corrected point coordinates, polygons, photographs, land use classification, etc.) of the respective coffee plot, which will be checked by 4C in the next step.

Additional information

Submission of application to 4C (EU.1.4)

Once finalized, the ME submits the BPM together with the geodata files via the BPM Upload tool to 4C for the deforestation assessment. In case of alerts for potential overlapping with deforestation, the ME shall provide the root cause of the alert to 4C. In addition, the Self-Declaration on legality (Annex II) needs to be submitted to 4C.

Submission of BPM and geodata files

6.1.2 EU.2: Deforestation check by 4C

Provision of further evidence (optional) (EU.2.1)

In case of an occurrence of alerts in the deforestation assessment, the additional evidence provided by the ME will be evaluated by 4C. If the provided evidence is not sufficient to resolve the alert, the ME can provide further means of proof or exclude the respective farm(s) or the BP Producer from the 4C Unit by providing an updated BPM.

Solving deforestation alert

To provide further evidence, the ME can:

Gather further evidence

- Conduct a self-on-site verification, or
- Request technical support from GRAS (or other service providers) to counter-verify the geolocation in a detailed, high resolution satellite image analysis. When using GRAS, this is an additional and paid case-by-case service and subject to an extra fee to be granted by the ME to 4C. In the case the alert can be traced back to an inaccuracy of the underlying forest map, this fee will be covered by 4C.

Check on completeness and deforestation check by 4C (EU.2.2)

In case the deforestation alert cannot be resolved through the additional evidence provided or a detailed analysis, the related farm(s) or all farms of the related BP Producer need to be immediately excluded from the 4C Unit to become 4C certified EUDR Coffee compliant. In addition to the exclusion of the related farm(s), coffee being harvested from this area needs to be physically segregated and excluded from any batch with destination to the European Union. The ME would then be required to resubmit the BPM with respective geodata files to 4C after the exclusion of the respective farm(s) or BP Producer(s) for a repeated deforestation check.

Exclusion of alerted farms

Once all alerts detected are solved, or in case no alerts occurred in the deforestation assessment and all pertinent documents have been submitted, 4C will complete the check. Subsequently, the confirmation and report will be issued as detailed in the following step EU.3.

Completion of check

The ME has the responsibility to provide 4C with the additional evidence, including the methodology and means by which this evidence was collected, or to inform about the decision of excluding farm(s) due to alerts in a timely manner. This ensures that the assessment can be completed in time and that the ME's expectations to comply with 4C requirements for the audit application, the AU evaluation and to be able to trade 4C certified EUDR Coffee are being met.

ME's responsibility

Any plots of land with alerts in the deforestation analysis are potentially subject to an on-site third-party auditor verification in the next audit.

Alerts part of audit check

6.1.3 EU.3: 4C certified EUDR Coffee confirmation and report

Once the pre-evaluation by the ME has been finalized and all relevant documents have been submitted, 4C validates the geodata of coffee plots from the final BPM and issues a report to the ME for deforestation-free production.

Emitting report for ME

Only after this step the ME is allowed to buy and include coffee harvested from these geolocations into their supply chain.

Eligible coffee

6.2 Alignment of 4C certified EUDR Coffee with the 4C certification cycle

All steps described in this regulation shall be completed by the 31st of December 2024. Therefore, the application of the ME for the deforestation assessment by 4C (EU.1.4) shall be submitted by the 30th of September 2024 at the latest to allow the evaluation by 4C and potential corrections by the ME to be concluded in time.

Deadlines

- i. However, to become 4C certified EUDR Coffee compliant a voluntary adaptation process can already be conducted before the due date. This entails following the procedure described above, not only for the initial application but each time there is a change in the 4C Unit (EU.1.2) and before each AU and 4C audit.

Continuous implementation

This chapter details the scenarios of implementing the 4C certified EUDR Coffee procedure in alignment with the certification cycle or integrated into the 4C audit process.

6.2.1 Alignment with the 4C certification cycle

The process applies to all 4C Units to become 4C certified EUDR Coffee compliant on a voluntary basis in 2024. Already certified 4C Units can conduct the 4C certified EUDR Coffee process regardless of their compliance level at any time independent of when the next 4C audit or AU takes place. Once compliant with 4C certified EUDR Coffee the process has to be repeated before each 4C audit or AU and whenever there is a change in the 4C Unit. ME's which aim to newly become 4C certified and compliant with 4C certified EUDR Coffee at the same time, can conduct the steps EU.1-EU.3 in the preparation for certification as described in Chapter 6.2.2.

Voluntary application

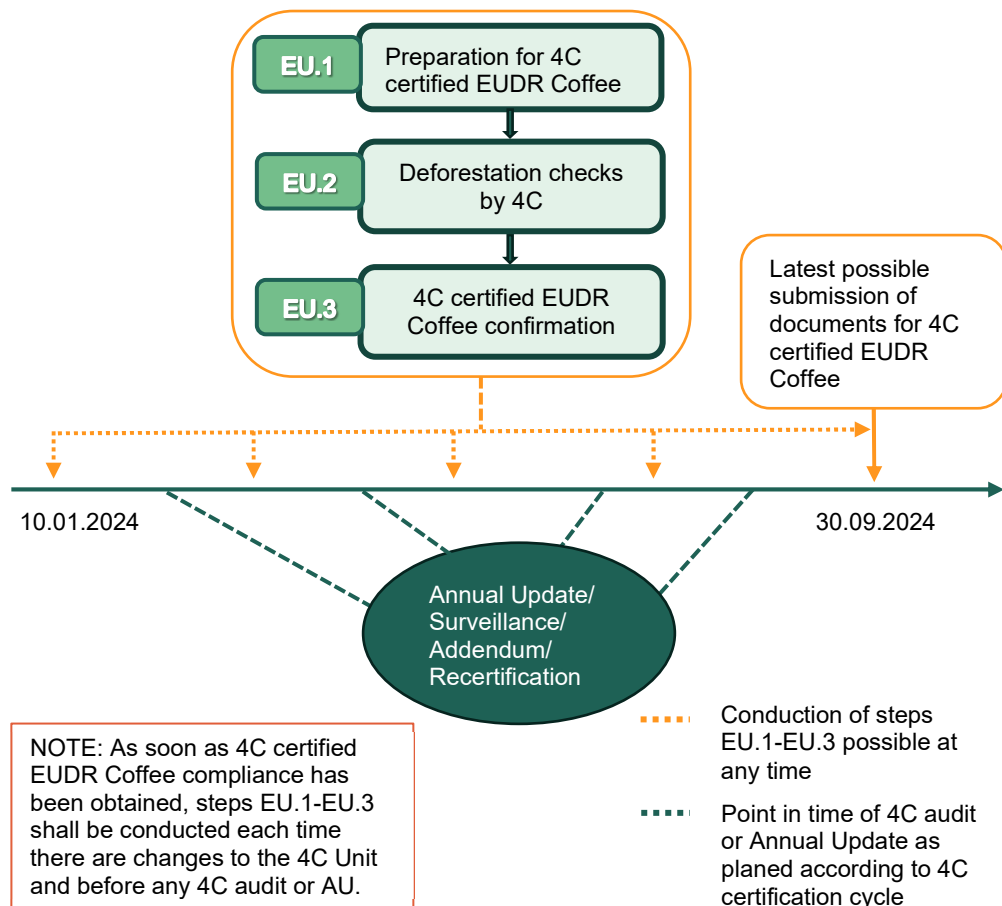


Figure 4: Voluntary application in 2024

The process as laid out in Figure 5 is mandatory to all 4C Units as of the 1st of January 2025 and from then on whenever there is a change in the 4C Unit and before a 4C audit or the AU is being conducted.

Mandatory application

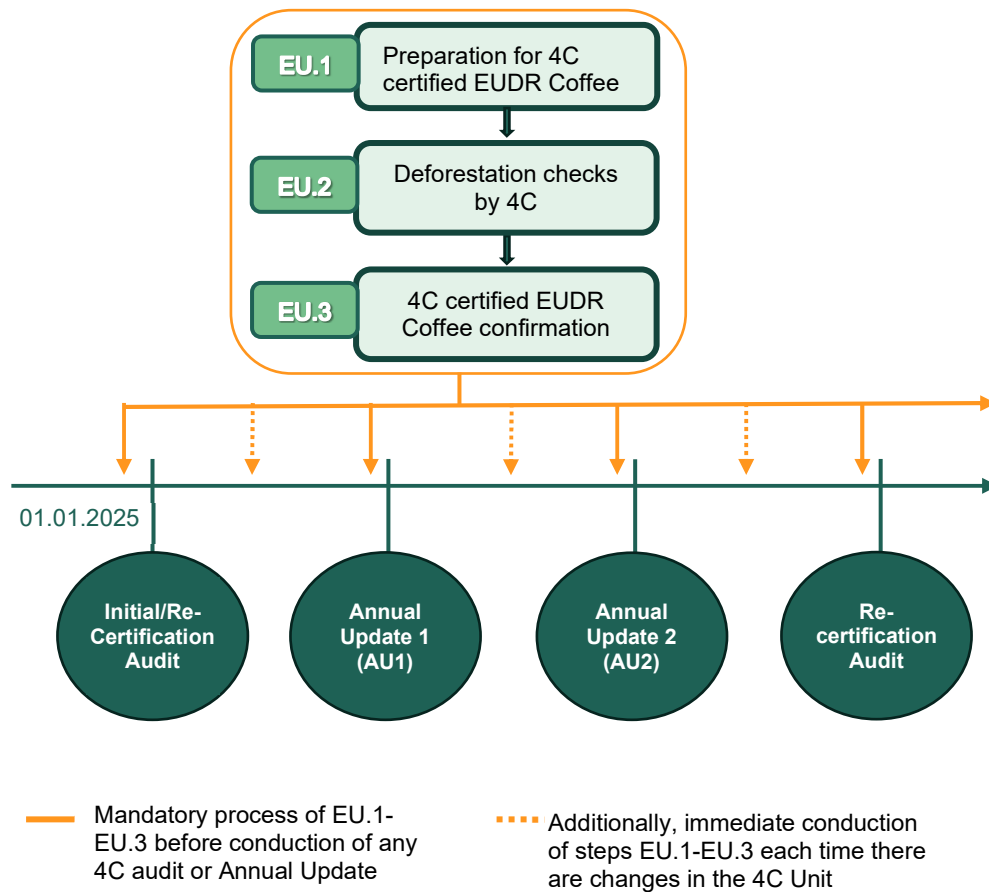


Figure 5: Mandatory application in 2025

Responsibilities of the ME:

- Perform the 4C certified EUDR Coffee procedure (Chapter 6.1)
 - Update the BPM (based on the last validated BPM by CB and 4C, e.g., from last audit or AU evaluation) and geodata files each time there are changes in the 4C Unit.
 - Evaluate the deforestation risk.
 - Conduct the legality Self-Assessment.
 - Submit the required documents for deforestation assessment.
 - Provide further evidence, if required.
 - Complete the procedure to get 4C validation on deforestation-free production.
- Only trade coffee originating from BP Producer farms for which geolocations were confirmed deforestation-free by 4C.
- Continuously implement the 4C certified EUDR Coffee procedure once started.

6.2.2 Integration into the 4C audit process

This process is mandatory for all 4C Units once the ME started the 4C certified EUDR Coffee procedure or from the 1st of January 2025 onwards.

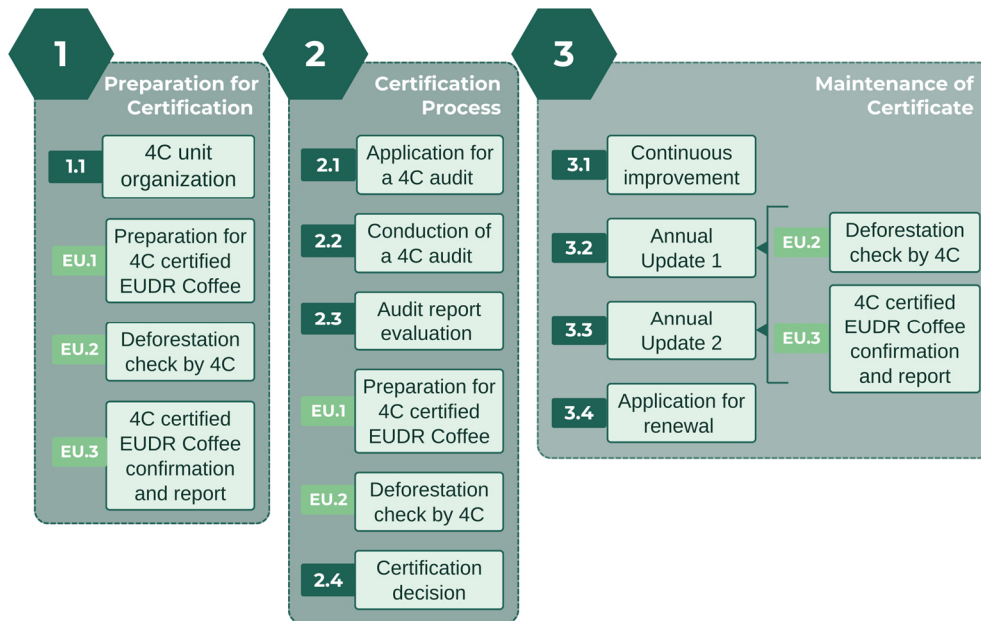


Figure 6: 4C certification process with integrated EU steps

During the preparation for certification

Responsibilities of the ME:

- Complete the 4C certified EUDR Coffee process (steps EU.1, EU.2, and EU.3, chapter 6.1) before contracting a CB cooperating with 4C for the audit.
- Submit the last BPM with geodata validated by 4C to the CB as the BPM application document for the audit.

During the certification process

Responsibilities of the CB:

Application for a 4C audit

- Use the BPM with geodata validated by 4C as deforestation-free for the risk assessment and audit plan registration.
- In case a different BPM is used for the audit plan, a reason for this change shall be indicated.

Conduction of a 4C audit

- Consider the coffee plots alerted with deforestation from step EU.2 in the risk analysis and for sample selection.

Audit report evaluation

- Upload the final BPM seven days prior to the 60 days deadline for audit report submission and certificate decision, evaluated by the CB evaluator, to the 4C Portal for 4C to perform steps EU.2 and EU.3.

- The deforestation checks by 4C and if required the correction by the ME will be conducted within the time frame of the deadline.

Certificate decision

- Before the 31st of December 2024, the validation of 4C on deforestation-free production is not a prerequisite for making a positive certification decision of a 4C audit.
- From the 1st of January 2025, the validation of 4C on deforestation-free production is mandatory for making a positive certification decision of the 4C audit. In case of unsolved alerts of deforestation in the final BPM at the deadline for the CB to take the certificate decision, this shall lead to a negative decision on certificate issuance.

During the maintenance of certificate

All requirements for the ME as stated in chapter 6.2.1 shall be complied with to maintain the validity of the 4C certified EUDR Coffee compliance.



ANNEX I

Self-Assessment for EUDR legality compliance

This Self-Assessment shall be conducted to the best of your knowledge and belief. It is meant to help identify risks of violations to relevant national and international laws. This Self-Assessment is not subject to external verification but to support the Managing Entity (ME) to demonstrate compliance with the requirements of the EUDR towards Article 2(40) and Article 3; 'Relevant commodities and relevant products shall not be placed or made available on the market or exported, (b) unless they have been produced in accordance with the relevant legislation of the country of production.'

Article 2(40), Definitions:

'Relevant legislation of the country of production' means the laws applicable in the country of production concerning the legal status of the area of production in terms of land use rights, environmental protection, forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting, third parties' rights, labour rights, human rights protected under international law, the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples and tax, anti-corruption, trade and customs regulations.'

NOTE: The column 'Reference to 4C Audit checklist v.4.1' refers to the respective content in the 4C Audit checklist v.4.1, where further information is available in the verification guidance.

Producer organization (Managing Entity):

4C Unit:

4C Unit Number:

Date of assessment:

Filled out by (responsible person):

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
General laws and regulations					
1.	Regional and national laws and regulations	ME12, P3, SP4	<p>Are you and your Business Partners (BPs) aware of the regional and national laws and regulations applicable to your business?</p> <p>Relevant laws according to EUDR are regarding:</p> <ul style="list-style-type: none"> ➤ Land-use rights ➤ Environmental protection ➤ Forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting ➤ Third parties' rights ➤ Labour rights ➤ Human rights protected under international law ➤ The principle of free, prior, and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples ➤ Tax, anti-corruption, trade, and customs regulations 		
2.		ME12, P3, SP4	Do you have trainings or information material in place, which explain the policy update on the current development of changes due to EUDR of applicable laws and regulations for your staff and your BPs?		
3.		ME12, P3, SP4	Are your BPs informed about these materials, and have committed to follow the requirements?		
4.		ME12, P3, SP4	Do you have this policy incorporated into and implemented through your Internal Management System (IMS)?		
5.		ME12, P3, SP4	Do you have a system in place to check and ensure the compliance of your BPs with all applicable laws and regulations? Do you have evidence to show that the policy is implemented through your IMS?		
6.		ME12, P3, SP4	Do you have evidence demonstrating the commitment of all BPs (Producers and Service Providers) to the respective national laws and regulations, relevant to coffee production, processing, and trade?		
7.		ME13, P4, SP5	Are your subcontractors aware of the requirements resulting from all relevant regional and national laws and regulations, and committed to the same level to comply with them?		

¹ Due to overlapping, subcategories could be categorized under different law topics mentioned in the EUDR. To avoid doubling they are only allocated to one of them in this self-assessment.

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
8.	Relation to subcontractors'	ME13, P4, SP5	Do you have documents to provide evidence of this commitment by the subcontractor(s)?		
Land use rights					
9.	Practices of forced eviction	P16	<p>Are practices of forced eviction to acquire land for coffee production, processing, and handling inhibited?</p> <p>Do you have control over and evidence showing that there is no indication of practices of forced eviction to acquire land for coffee production, processing, and handling from 2006 onwards? And in case of legal forced evictions, are negative effects of relocation mitigated? Evidence of compensation paid is available, including information on recipients of compensation, amount of compensation (e.g., housing, land, money), etc. as mutually agreed upon? Are negative impacts on communities avoided?</p> <ul style="list-style-type: none"> ✓ Check whether there is any kind of evidence of an existing conflict regarding land use. ✓ Check documents of land titles and, land rights. ✓ Check if evidence of compensation paid is available, including information on recipients and the amount of compensation. 		
10.	Legal land titles and government permits for cultivation	P18	<p>Do all BP Producers have legal land titles and/or government permits for the land they are cultivating? Do you have control over and evidence showing that there is clear indication of land title, land rights, government permits, etc. according to national and customary laws?</p> <p>In case legal land titles and/or government permits are not yet issued for all land, is an official certificate of the head of municipality or similar available?</p> <ul style="list-style-type: none"> ✓ Check whether men and women's rights according to formal and customary laws are implemented to ensure women's legal land title and land use rights, and land ownership. <p>Check documents on land title, land rights, government permits, etc. according to national and customary laws.</p>		
Environmental protection					
11.	Hunting regulations	P73	Do you have control over and evidence showing that no hunting and/or trapping of protected species takes place?		
12.	Pesticides use	P768	Do you have control over and evidence showing that pesticides listed in the 4C List of Unacceptable Pesticides are banned from the use for coffee production?		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
13.		P780	Do you have control over and evidence showing that the use of pesticides for coffee production is limited to officially registered products in the country?		
14.		P86, SP65	Do you have control over and evidence showing that pesticides/chemicals are applied, handled, stored, and disposed in an appropriate way, including empty containers?		
15.	Pest control/burning restrictions	P84	Do you have control over and evidence showing that legal burning restrictions for pest control have been followed?		
16.	Soil conservation	ME33	Based on national legislation, do you have control over and evidence showing that based on the soil analyses, the ME provides (or facilitates access to) technical assistance or recommendations from research institutions regarding nutritional requirements?		
17.	Soil fertility	P91	Do you have control over and evidence showing that fertilizers are applied according to nutritional requirements? Check whether the documented amount and type of fertilizer applied fits the nutritional requirements of the plants and/or the soil fertility plan.		
18.		P93, SP66	Do you have control over and evidence showing that water sources have been identified, conserved, and assessed against their availability for local communities and recuperated if necessary? Check whether water sources have been identified, conserved, and assessed and documents are available to show evidence.		
19.		P96, SP66	Do you have control over and evidence showing that natural vegetation areas around springs and natural watercourses are maintained or re-established?		
20.	Water use and conservation	P97, SP69	Do you have control over and evidence showing that storage and washing areas for fertilizers, pesticides, batteries, diesel, other fuel or oil tanks or any waste that could contaminate water source are safely constructed, environmentally safe and kept according to local law?		
21.		P98, SP70	Do you have control over and evidence showing that water use is following applicable regulations and local legislations and does respect existing water use rights (both formal and customary)?		
22.		P99, SP71	Do you have control over and evidence showing that in case of disputes related to water, the BP Producer(s) engage(s) with affected stakeholders to resolve it?		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
23.	Waste management	P100, SP72	Do you have control over and evidence showing that overuse of water in critical catchment areas is avoided?		
24.		P103, SP75	Do you have control over and evidence showing that wastewater is not discharged directly into water courses?		
25.		P104, SP76	Do you have control over and evidence showing that a waste management plan is available and clear measures on waste management are in place? <u>NOTE:</u> Waste management plan and measures should correspond with the size of the BP Producer's operation, and should include measures to reduce, reuse and recycle waste.		
26.		P105, SP77	Do you have control over and evidence showing that the waste management plan is being implemented?		
27.		P106, SP78	Do you have control over and evidence showing that hazardous wastes are safely disposed of to prevent contamination of water, soil, and air resources as well as harm to human beings and animals?		
Third parties' rights					
28.	Impact of operations for surrounding communities	P50, P51, SP46, SP47	Do you have control over and evidence showing that any negative impacts (e.g., on food security, drinking water availability, access to sanitation, health, pollution of soil, water and air, noise and odours, education, cultural monuments, or rights of indigenous or marginalised groups) from the BP Producers' operations on neighbouring communities are assessed, identified, and addressed? ✓ Check on impacts on food security, water availability (including drinking water), access to sanitation, health, pollution of soil, water and air, noise and odours, health care service, education, cultural monuments, or rights of indigenous or marginalised groups, etc., prior to any significant intensification or expansion of cultivation or infrastructure. Check on records and/or documentation for showing evidence to the above listed topics.		
Labour rights					
29.	Freedom of association and collective action	P27, SP23	Are all workers of BPs free to establish and join labour organizations of their own choice and to organize themselves to perform collective bargaining? Are workers made aware of their right to association? Do you have control over and evidence showing that there is no barrier for workers:		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
			<ul style="list-style-type: none"> ✓ Check whether there is evidence of prohibiting, stopping, or restricting the collective bargaining activities organized by worker groups or by their representative labour organizations. ✓ Check whether there is evidence of interference with the right: <ul style="list-style-type: none"> ○ to strike, both by BPs and any subcontracted parties, such as security forces, if applicable. ○ to form and join independent organizations for the purpose of protecting their interests (such as trade unions and labour organizations for workers, and federations, associations, farmer groups for producers) ○ to organize collective bargaining activities, organized by worker groups or by their representative labour organizations. ○ to organize and implement the right to strike, neither inhibited by the BP Service Provider, nor by any subcontracted parties, such as security forces if applicable. ✓ Check whether access to the information and necessary resources are granted to representatives of independent organizations to carry out their functions. ✓ Further, there is no indication of discrimination, adverse action against or exclusion of members of independent organizations. (e.g., no promotion, disciplinary actions, employee transfers, dismissal). <p><i>(Referring to C087 - ILO Freedom of Association and Protection of the Right to Organise Convention, 1948; and C098 - ILO Right to Organise and Collective Bargaining Convention, 1949).</i></p>		
30.	Workers' rights to co-determination	P28, SP24	<p>Do you have control over and evidence showing that there are mechanisms of collective bargaining in place?</p> <ul style="list-style-type: none"> ✓ Check whether annual discussions with permanent workers take place and whether documentation is available. <p><i>(Referring to C098 - ILO Right to Organise and Collective Bargaining Convention, 1949).</i></p>		
31.	Discrimination at the workplace	P31, SP27	<p>Do you have control over and evidence showing that there is a policy (rules, regulations, guidance) against discrimination in place, that is communicated to all workers of BPs?</p> <p>Are practices of any sort of discrimination, violation of equal rights, harassment, and/or abusive treatment inhibited?</p> <ul style="list-style-type: none"> ✓ Check selection and hiring procedure, as well as rules and policies for any indication of discrimination (Discrimination includes unequal remuneration for equivalent work). <p><i>(Referring to C111 - ILO Discrimination (Employment and Occupation) Convention, 1958; C100 - ILO Equal Remuneration Convention, 1951).</i></p>		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
32.	Physical, sexual, psychological, or verbal harassment or abuse	P34, SP30	<p>Is any form of physical, sexual, psychological, or verbal harassment or abuse among workers, between workers and BPs or subcontracted parties, and within the family workforce inhibited?</p> <p>Do you have control over and evidence showing that there is no harassment or abuse happening in and around the workplace?</p> <p><u>Note:</u> This includes harassment, abuse, humiliating treatment, torture, and harm to life by subcontracted parties, e.g., security forces if applicable.</p>		
33.	Fair labour contracts	P38, SP34	<p>Are labour contracts available and adhered to?</p> <ul style="list-style-type: none"> ✓ Check whether you have control over and evidence showing that written labour contracts for all workers are available and that all workers have a copy of their labour contract. ✓ Check whether labour contracts are complying with national and local laws and regulations. ✓ Check whether the contractual agreements are adhered to. <p><u>Note:</u> Contracts should include information on working hours, breaks, rest days, overtime, deductions, sickness, holiday entitlement, paid leave, period of notice, etc.</p>		
34.	Employment conditions of workers	P39, SP35	<p>Do the employment conditions (e.g., working hours, breaks, rest days, overtime, sickness, holiday entitlement, paid leave, period of notice etc.) of BPs' workers comply with national laws and regulations?</p> <p>Do you have control over and evidence showing that legal regulations and/or collective bargaining agreements are complied with?</p> <p>Check on records for working hours, breaks, rest days, overtime, deductions, sickness, holiday entitlement, paid leave, maternity/paternity leave, reasons for dismissal, period of notice, homework, etc.</p>		
35.	Salaries/wages	P40, P42, SP36, SP38	<p>Do you have control over and evidence showing that at least the national minimum wage is paid to all workers in a timely manner?</p> <p>Monitor piece rate payment systems to ensure the total salary paid is at least equivalent to national or sector minimum wage.</p> <p>Check pays slips or any other recording of salary payments.</p>		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
36.	Working conditions	P53, SP49	Do you have control over and evidence showing that adequate housing is provided to permanent and/or temporary workers if needed?		
37.		P54, SP50	Do you have control over and evidence showing that designated rest areas, sanitation facilities and equipment (or similar) is available to all workers?		
38.	Occupational health and safety	P59, SP55	Do you have control over and evidence showing that clear and permanent warning signs are placed at potential risk areas?		
39.		P60, SP56	Do you have control over and evidence showing that safety procedures to handle pesticides, hazardous chemicals, fertilizers, and other Plant Protection Products are in place? Check whether there is a specific plan on procedures in accordance with regional and national legislation as well as ILO recommendations (e.g., C170 – Chemical Convention).		
40.		P62, SP58	Do you have control over and evidence showing that health insurance fees and/or treatment costs linked to work-related injuries or illnesses are covered by the BP, if required by national legislation? <i>(Referring to C025 - Sickness Insurance (Agriculture) Convention, 1927).</i>		
41.	Safety equipment and facilities	P61, SP57	Are all accidents documented and actions taken to prevent similar accidents in the future? Is appropriate medical treatment provided in case of working accidents? Do you have control over and evidence showing that accident resolution is documented case by case, including information on medical treatment and planned prevention measures? Check for case-by-case documentation, including a logbook for accidents, medication, treatments, etc.		
42.		P63, SP59	Do you have control over and evidence showing that nursing women have access to nursing rooms/specific nursing places and adequate breaks during working hours?		
43.		P64, P65, P66, SP60, SP61, SP62	Do you have control over and evidence showing that the BP and all its workers are trained on and equipped with suitable protective clothing and equipment in accordance with legal requirements? Note: This includes training on safety equipment, its availability, its regular use, and its storage in adequate facilities.		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
44.	Hazardous work	P67, SP63	<p>Is the involvement of impaired workers in hazardous work inhibited? Do you have control over and evidence showing that hazardous work is not executed by impaired workers?</p> <ul style="list-style-type: none"> ✓ Check whether a return-to-work policy after injury or illness is implemented. ✓ Check on the return-to-work policy after injury or illness to ensure that injured or ill workers do not perform any activities that are detrimental to their health and safety or that of other workers. <p><u>Note:</u> Impaired workers are for example: Pregnant women and women that have recently given birth, nursing women, disabled workers with health condition and impairments or workers who suffer from e.g., chronic, or respiratory diseases, do not undertake hazardous work that jeopardizes their health, safety, or morals. <i>(Referring to C025 - Sickness Insurance (Agriculture) Convention, ILO, 1927)</i></p>		
Human rights					
45.	Forced and bonded labour	P19, SP15	<p>Are practices of forced and bonded labour and modern slavery inhibited? Do you have control over and evidence showing that there is no indication of forced and bonded labour or modern slavery?</p> <ul style="list-style-type: none"> ✓ Check whether there are any forms of sanctions, penalties, and coercion to compel workers to work: <ul style="list-style-type: none"> ○ Workers are not allowed to leave their workplaces and/or living quarters provided by the employer, ○ workers are not allowed to leave employment after reasonable notice, ○ identity or travel documents, salary/money or other asset deposits of workers are retained by the employer, ○ repayment conditions for possible indebted workers to employer exceed debt cost for employer itself, workers must pay off recruiting or hiring fees to employer. ✓ In case purchasing schemes for food, accommodation and/or transport are managed by the employer, check whether the costs exceed local market rates to maintain or increase the indebtedness of the workers. ✓ Check workers contracts, payment records, recruitment policy. <p><i>(Referring to CO29 – ILO Forced Labour Convention, 1930; C105 – ILO Abolition of Forced Labour Convention, 1957; International Covenant for Civil and Political Rights of Office of the United Nations High Commissioner for Human Rights (OHCHR), 1966)</i></p>		

No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
46.	Trafficking of people	P20, SP16	Do you have control over and evidence showing that there is no trafficking of people for recruitment of labour?		
47.	Illegal practices and penalties	P21, SP17	Are disciplinary measures in line with national laws and internationally recognized human rights? Do you have control over and evidence showing that there is no use of arbitrary penalties, e.g., in case of pregnancy, sickness, etc, and that deduction of fees from wages for disciplinary purposes is forbidden?		
48.	Child labour	P22, P23, P24, SP18, SP19, SP20	Do you have control over and evidence showing that there is no child labour ongoing outside the legal boundaries of permitted child work and working age? Is child labour that violates the legal boundaries concerning age and type of work inhibited? Do you and your BPs have a process in place to assess, prevent and monitor child labour cases? <i>(Referring to C182 - ILO 'Worst Forms of Child Labour Convention', 1999; and C138- ILO 'Minimum Age Convention', 1973; 4C Guidance on the Protection of Children's Rights)</i>		
The principle of free, prior and informed consent (FPIC)					
49.	New land acquisition	P17	Have new land acquisitions been carried out with free, prior, and informed consent (FPIC)? Do you have control over and evidence showing that there is no violation regarding FPIC of affected people? <u>NOTE:</u> This includes legal and customary land use rights, especially for Indigenous Peoples. Is evidence of compensation payment available, including information on recipients of compensation, amount of compensation (e.g., housing, land, money), etc. as mutually agreed upon? Are negative impacts on communities avoided or mitigated? ✓ Check if evidence of compensation payment is available, including information on recipients and amount of compensation. Check which kind of evidence is available showing measures to avoid or mitigate negative impacts.		



No.	Subcategory ¹	Reference to 4C Audit checklist v.4.1	Self-Assessment Guidance	Yes/ Partially/No	Notes/Comments/ Mitigation Measures
Tax, anti-corruption, trade and customs regulations					
50.	Bribery, corruption, fraud, and/or extortion	ME10, P2, SP2	Do you have a publicly available policy on your commitment to prevent any form of bribery, fraud, corruption, and/or extortion?		
51.		ME10, P2, SP2	Are all your trade documents such as contracts, agreements, records etc. in line with this policy and there is no evidence of any form of infringement?		

Place, date

Signature



SELF-DECLARATION FOR PRODUCER ORGANIZATIONS OF LEGAL PRODUCTION OF GREEN COFFEE

IDENTIFICATION

**Producer organization
(Managing Entity):** [REDACTED]

National Identification Number: [REDACTED]

Address (Street / Building No.): [REDACTED]

Postal code: [REDACTED]

City : [REDACTED]

Country: [REDACTED]

4C Unit: [REDACTED]

Responsible representative: [REDACTED]

Recipient: 4C Services GmbH, Hohenzollernring 72, 50672 Köln, Germany.

DECLARATION

I, [REDACTED] herewith declare, that all green coffee provided by the producer organization [REDACTED], responsible for managing and selling green coffee from the attached list of coffee producers and the processing business partners, has been produced in accordance with the relevant laws and regulations of the producer country, taking reference to the 4C Self-Assessment for EUDR legality compliance (ANNEX I to the Regulation for 4C certified EUDR Coffee v.1.0). The relevant topics as listed in Article 2 (40) are land use rights, environmental protection, forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting, third parties' rights, labour rights, human rights protected under international law, the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples, and tax, anti-corruption, trade and customs regulations.

Therefore, I declare that this green coffee production is in line with the requirements of the Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the European Union market and the export from the European Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, Article 2 (40), Article 3 (a), Article 9 (h) and Article 10 (1).

With my signature, I confirm that I undertake to comply with the Regulation (EU) No 995/2010, and that I am aware of the consequences set out in Article 25 "Penalties" in the event of a breach.

Place: [REDACTED]

Signature: [REDACTED]

Date : [REDACTED]

D D - M M - Y Y

