



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	P76	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.		P78	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.	Water use and conservation	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.		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
