

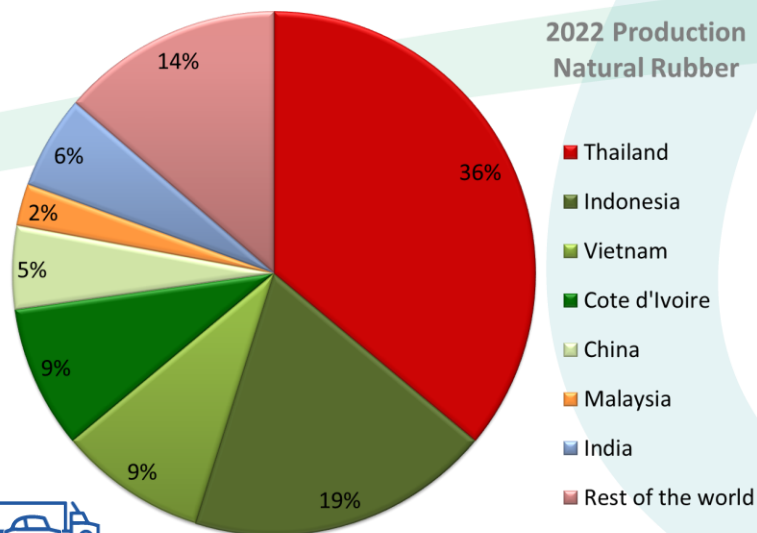
EUDR Bijeenkomst Réunion EUDR

5 september 2024

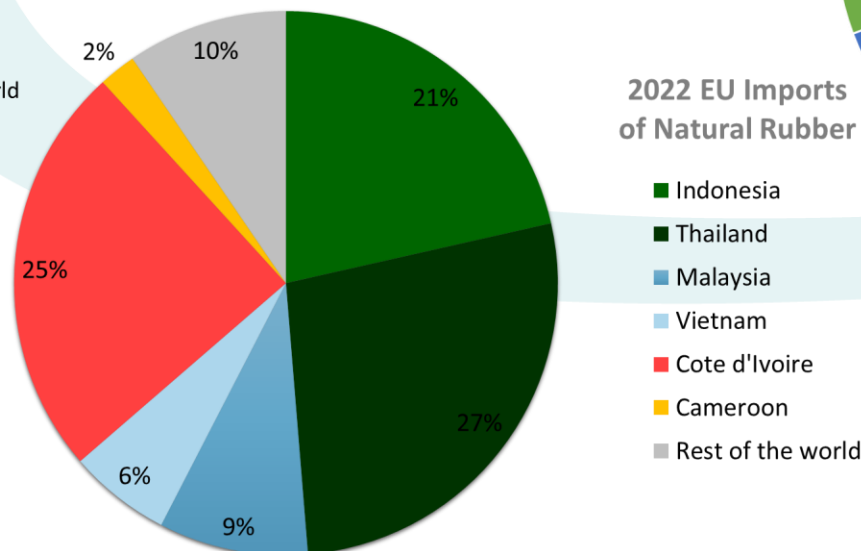


Waar wordt natuurlijk rubber geproduceerd en gebruikt?

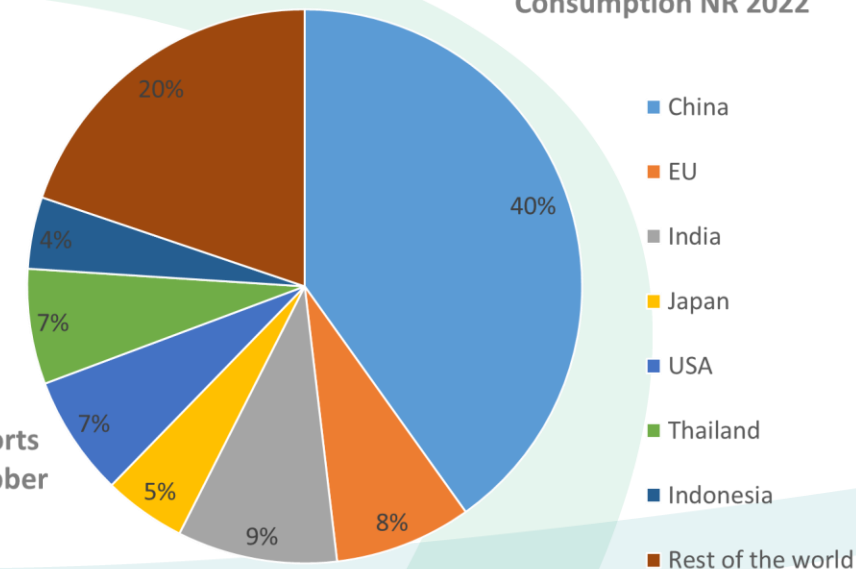
2022 Production
Natural Rubber



2022 EU Imports
of Natural Rubber



Consumption NR 2022





Volksgezondheid
Veiligheid van de Voedselketen
Leefmilieu



Agenda



Intro



Volksgezondheid
Veiligheid van de Voedselketen
Leefmilieu

EUDR wetgeving en stand van zaken
Législation et situation de l'EUDR



EUDR State of the Art, Concerns and Solutions



EUDR implementation status



Afsluiting en Q&A
Clôture et questions-réponses



EUDR wetgeving en stand van zaken

TRAXIO EUDR Bijeenkomst: de EUDR en de bandensector

5 september 2024

Bart De Sutter, beleidsadviseur FOD Leefmilieu



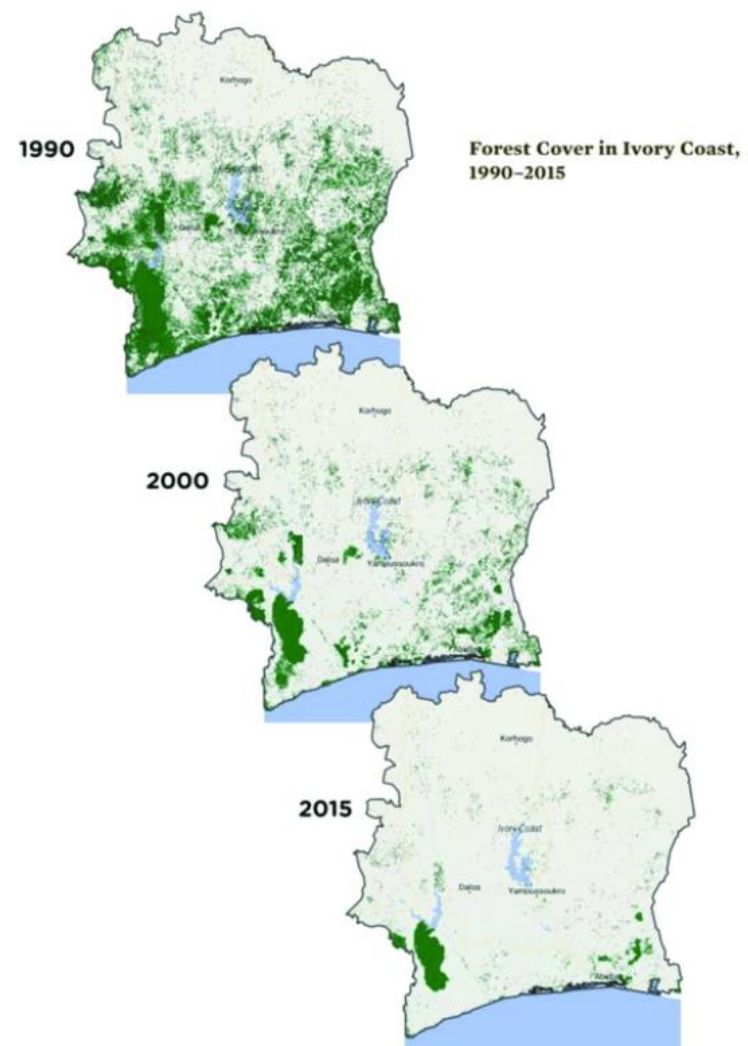
Volksgezondheid
Veiligheid van de Voedselketen
Leefmilieu

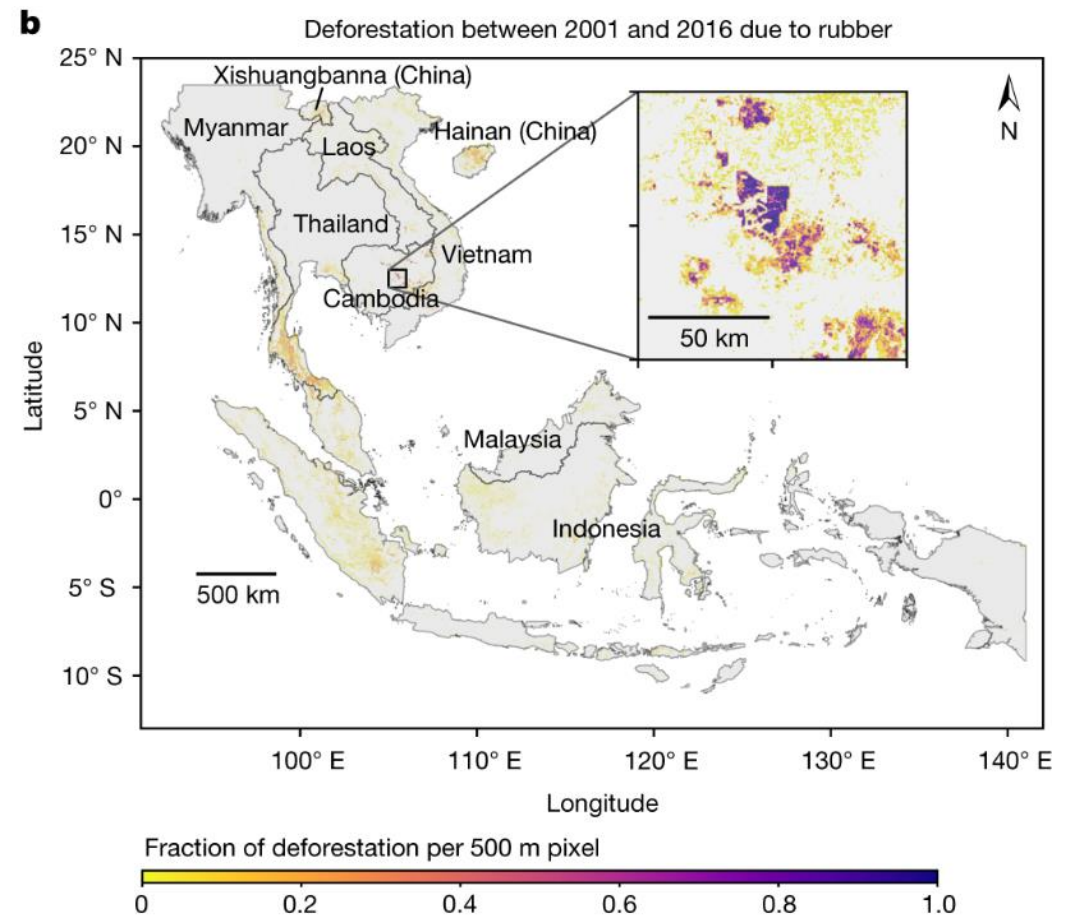
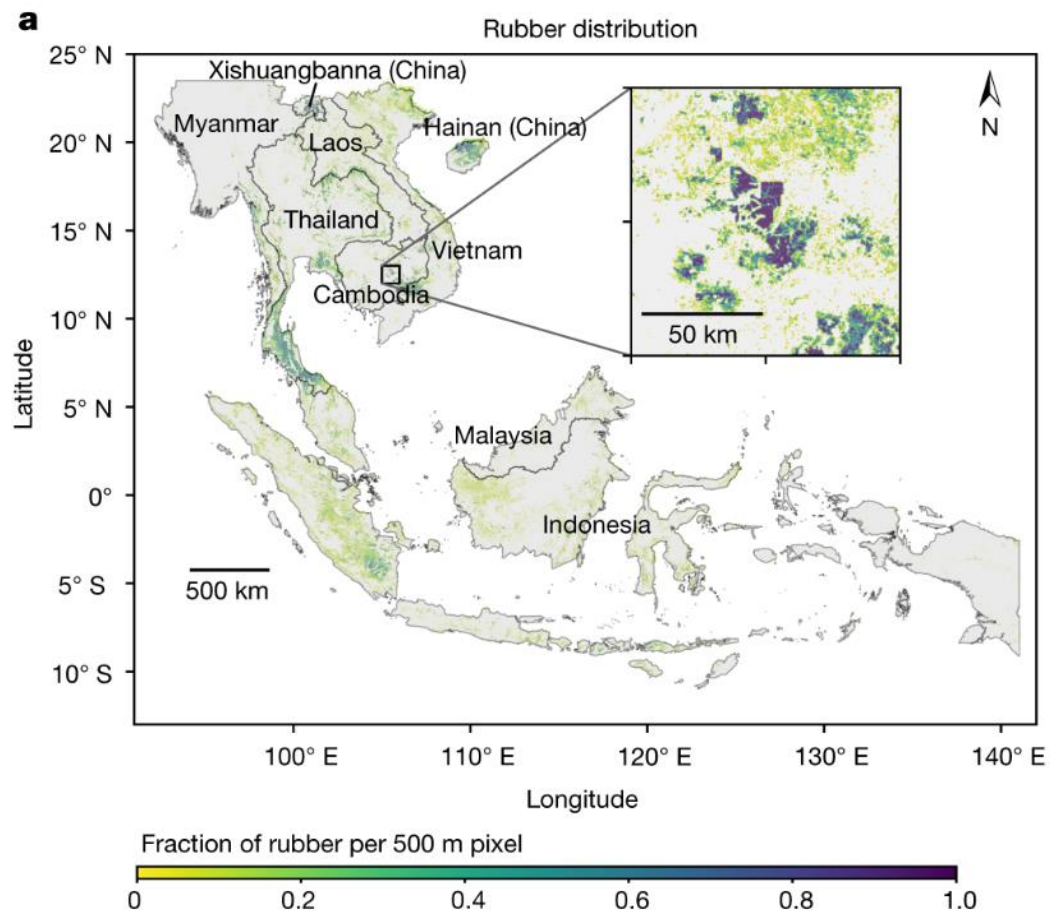


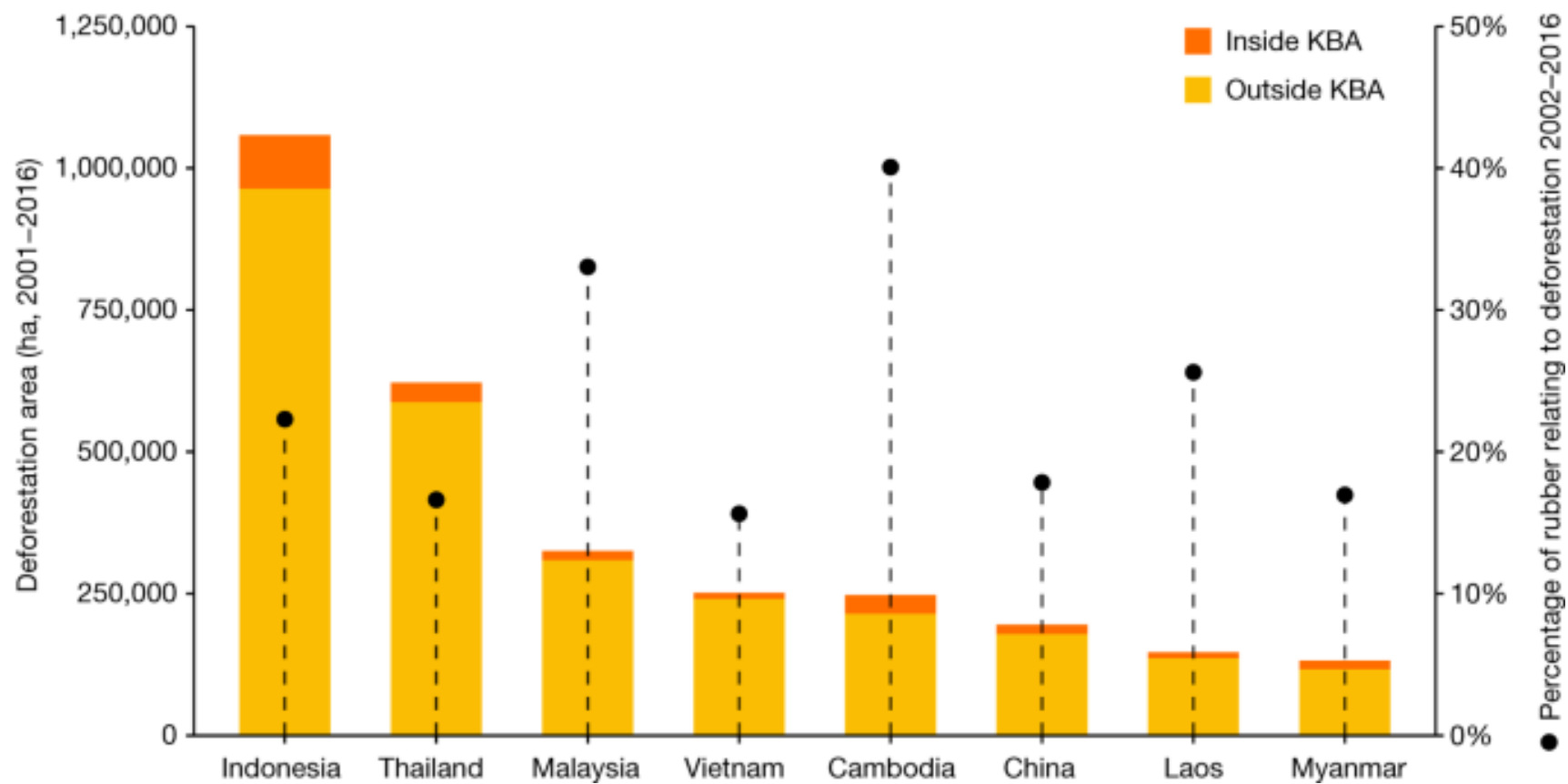
EUDR context

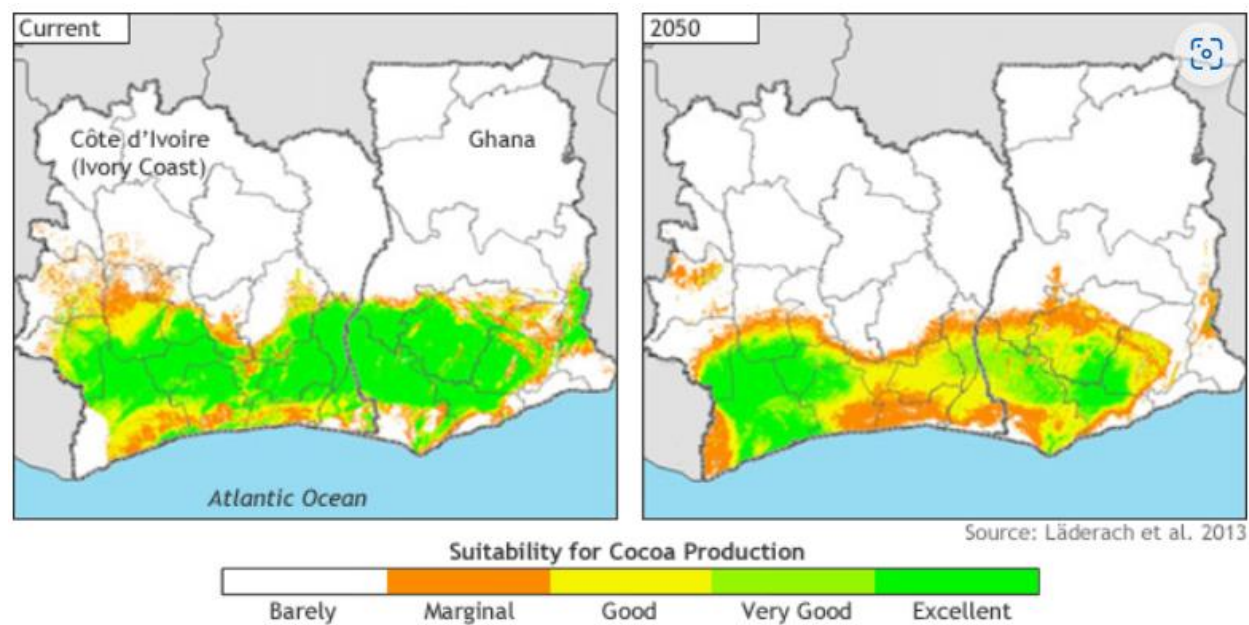
- Intertwined climate issues and biodiversity loss
- Globally **420 million hectares of forest - an area larger than the EU** - were lost between 1990 and 2020 (FAO).
- Deforestation and forest degradation are major causes of **climate change** (IPCC: 11% of greenhouse gas emissions) and **biodiversity loss - stopping deforestation and restoring ecosystems is the second most effective way to reduce emissions.**



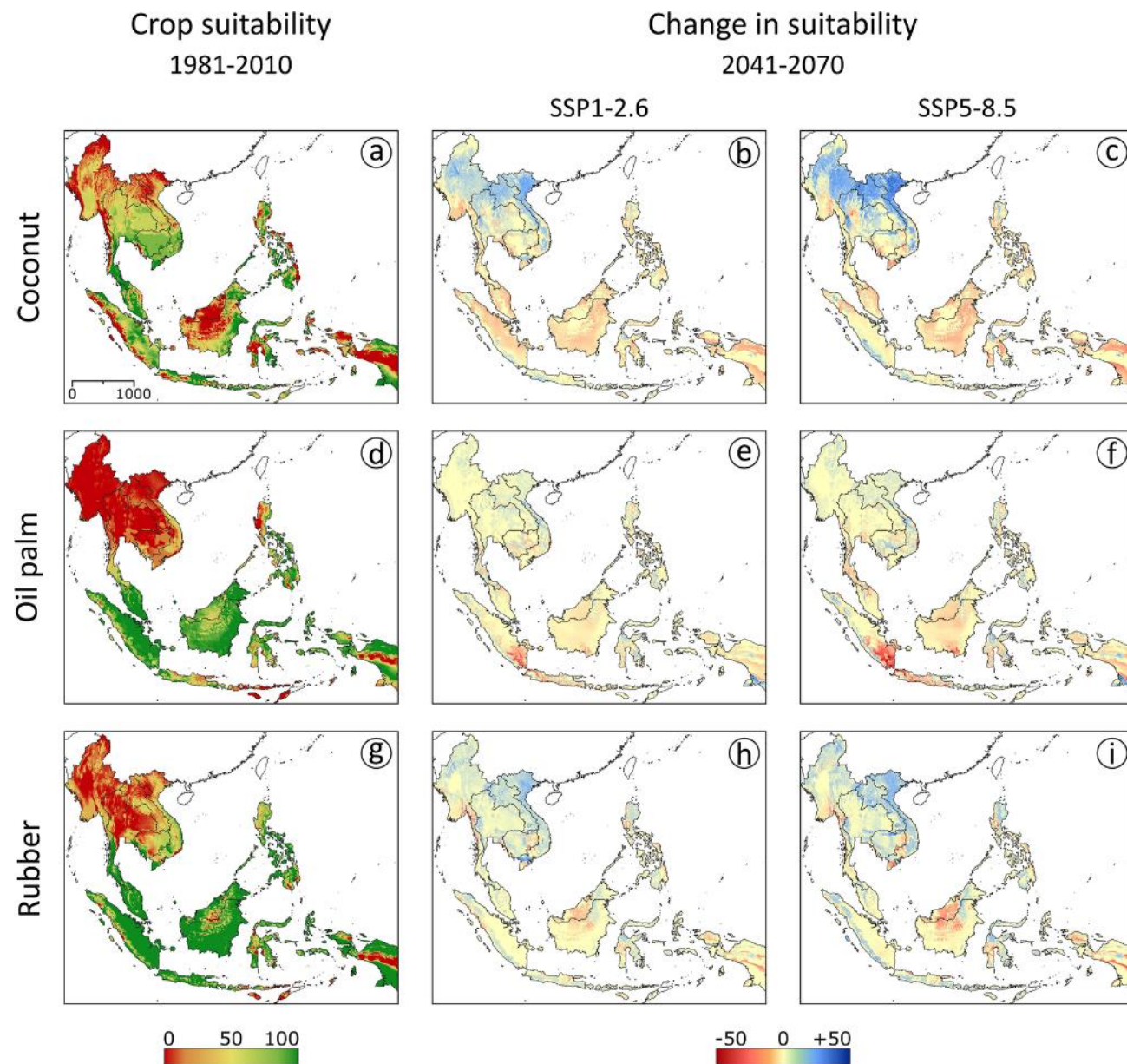








These maps show suitability for cacao cultivation at present (left) and projected for 2050 (right).
Image adapted from [Läderach et al. 2013](#).



EUDR context

- 2003 FLEGT: EU Action Plan for Forest Law Enforcement, Governance and Trade
 - Focus on illegal logging and related trade
 - FLEGT (2005) & EUTR (2010) regulations
- Focus on illegality insufficient: **significant proportion of forest loss is legal**
- 90% of deforestation is caused by **agricultural land expansion** (FAO).
- The EU is a **major producer and consumer of commodities** associated with deforestation and forest degradation.

General EUDR principles

- Art. 3: **relevant** products (Annex I) should
 - a) Be deforestation-free
 - b) comply with local legislation
 - c) be accompanied by a declaration of due diligence (DDS)
- Exercise due diligence by
 - following information requirements (Art. 9)
 - performing risk analysis (art. 10)
 - take risk mitigation measures (art. 11)

Most important elements

1. Selected commodities: **oil palm, soy, wood, cattle, cocoa, coffee, rubber** and some derived products
2. Expanding scope - to be updated regularly
3. Non-discrimination: both domestically produced and imported commodities and derived products
4. Cut-off date on 31 December 2020
5. Mandatory due diligence for all operators
 1. Both deforestation-free and legal (forest-related rules, labour rights, human rights, etc.)
 2. Key obligations for non-SME operators and traders
 3. Strict traceability of commodities and plot where it was produced

Traceability

- **Strict traceability** required through the obligation to communicate the geolocation of all production plots
 - Ensure that after 31/12/2020 no deforestation or forest degradation has taken place on the plot used to produce relevant commodities
 - Collect and transmit geolocation information of the plot in the supply chain
- Administrative traceability: documentation on plot and product

Relevant products

- 4001 Natural rubber, balata, gutta-percha, guayule, chicle and similar natural gums, in primary forms or in plates, sheets or strip
- ex 4005 Compounded rubber, unvulcanised, in primary forms or in plates, sheets or strip
- ex 4006 Unvulcanised rubber in other forms (e.g. rods, tubes and profile shapes) and articles (e.g. discs and rings)
- ex 4007 Vulcanised rubber thread and cord
- ex 4008 Plates, sheets, strips, rods and profile shapes, of vulcanised rubber other than hard rubber
- ex 4010 Conveyer or transmission belts or belting, of vulcanised rubber
- ex 4011 New pneumatic tyres, of rubber
- ex 4012 Retreaded or used pneumatic tyres of rubber; solid or cushion tyres, tyre treads and tyre flaps, of rubber
- stearic acid

EUDR obligations

- Provisions depending on role and size of company
 - operator: company exporting or making available for the first time relevant product on the Union market
 - Trader: company other than the operator (importer = operator)
- Operators & large traders
 - Establishment and maintenance of due diligence system (art. 12)
 - Exercising due diligence: **prior** to placing on or exporting from the market exercising to gather information, to assess and mitigate risk
 - Submitting due diligence statement: **after** exercising due diligence and **prior** to placing on or exporting from the market
 - May refer to previous due diligence statements when submitting their own due diligence statement

EUDR obligations

- SME operators & SME Traders
 - SME operators: art. 4(8): no due diligence and no DDS when placing on or exporting from the market a relevant product for which full due diligence has been carried out
 - On request provide DDS reference numbers
 - SME traders: limited to collection and retention of information
- Application EUDR starting from
 - 30/12/2024 for medium-sized and larger enterprises
 - 30/6/2025 for micro and small enterprises

Checks

- Art. 16 to 20, 23 to 25: checks and measures
 - Obligation to carry out checks
 - risk-based approach
 - Control quotas operators based on risk level country of production
- Checks by competent authority
 - Inspection cell deforestation, Federal Environmental Inspection, FPS HFCSE

Current situation

Search - DDS + Create

Search: Q Search Advanced search ▶ 30 / 31 results.

Declaration Number	Type	Product(s)	Status	Submission Date
23BEMFZAB35	Domestic Production	2304 00 00 Oilcake and other solid residues, whether or not ground or in the form of pellets, resulting from the extraction of soya-bean oil	Draft	
23BEJF24G38	Import	1801 Cocoa beans, whole or broken, raw or roasted	Submitted	28/03/2023 13:48
23BEXPLQT39	Import	0901 Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion	Submitted	28/03/2023 11:06
23BEL4S0R37	Import	0901 Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion	Submitted	27/03/2023 10:25
23BETQM8R36	Domestic Production	40 RUBBER AND ARTICLES THEREOF	Submitted	26/03/2023 14:14
BE2303PSVLBZZOEJ0QLA62	Import	0901 Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion	Submitted	24/03/2023 14:08
BE230300K9RKU4PL8DBQAM	Import	0901 Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion	Submitted	24/03/2023 13:58
BE2303Z48JYW25PUQ9ULN1	Import	0901 Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion	Submitted	24/03/2023 12:03
23BEUSRDTQ1F34	Import	1801 00 00 Cocoa beans, whole or broken, raw or roasted	Submitted	20/03/2023 13:20
		+1		
23BE0000017	Domestic Production	2306 60 00 Of palm nuts or kernels	Draft	

1. Reference Number

2. Activity

☐ Domestic
☒ Import
☐ Export

3. Operator/Trader name and address

Name BE DDS Operator Valid
Country Belgium ISO Code BE

4. Place of Activity

Country of activity: Belgium (BE) Copy Operator Country
Country of entry: France (FR) Date of entry:

5. Communication for Competent Authority

6. Commodity (ies) or Product(s)

+Add Commodity or Product

X Remove All

1

18 COCOA AND COCOA PREPARATIONS

1801 Cocoa beans, whole or broken, raw or roasted

Remove

Commodity (ies) or Product(s) Description *	Net Mass (Kg) *	Volume (m3)	Supplementary Units
Cocoa Beans	55		

Scientific Name

Common Name

+

1 Cacao Brasilensis

Cocoa Beans

-

+ Add Production Place

Import

Export

1


Producer Name

Producer Country *

No country selection

+

#	Description	Area *	Type *	Actions
1		94048.01 ha	Polygon	<div>x</div> <div>+</div> <div></div> <div>x</div>

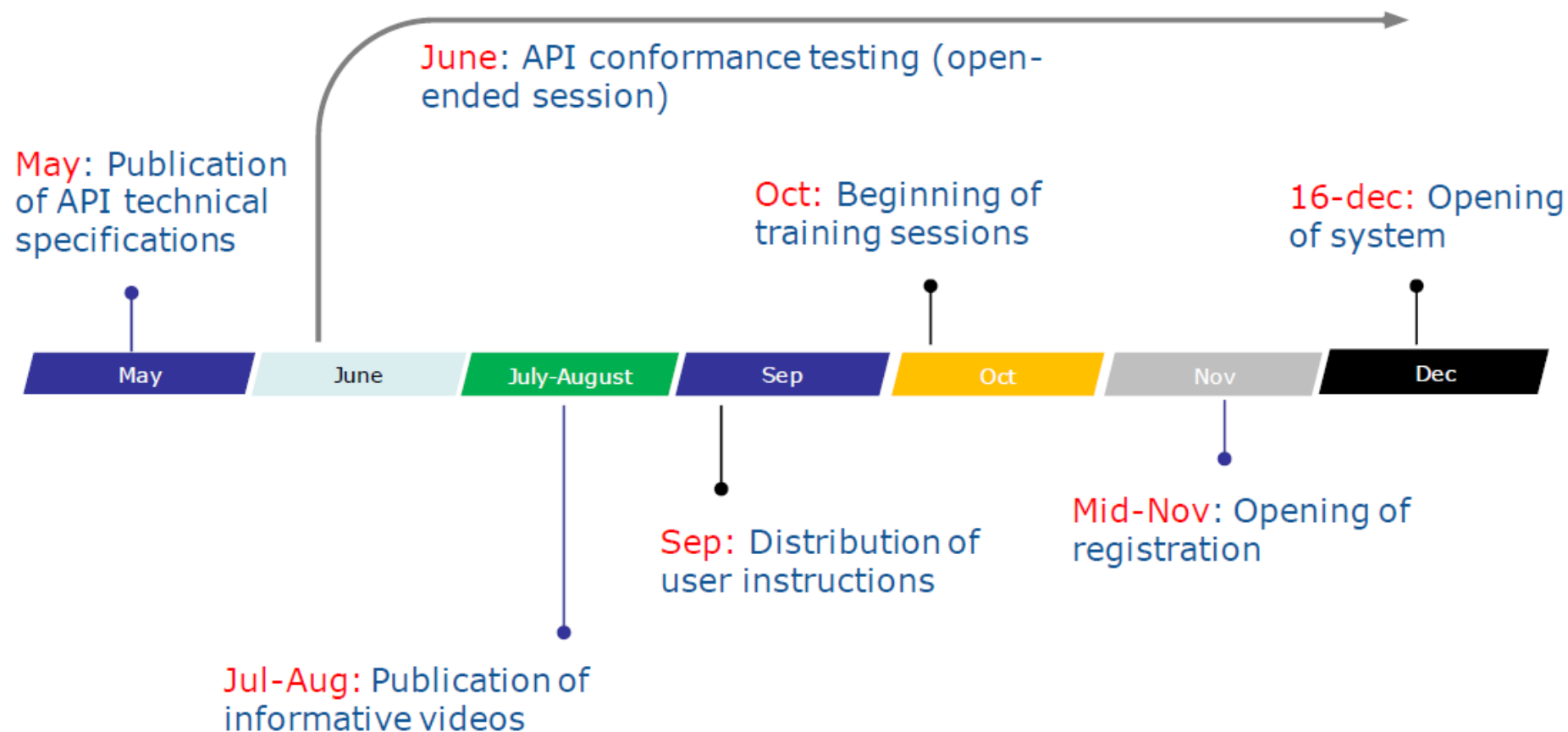

Volksgezondheid
Veiligheid van de Voedselketen
Leefmilieu

.be

- Pilot testing december – januari
- API in development
 - Submit a new DDS
 - Retrieve DDS information (Reference Number & Status)
 - Amend an existing DDS
 - Retract an existing DDS (Cancel or Withdraw)

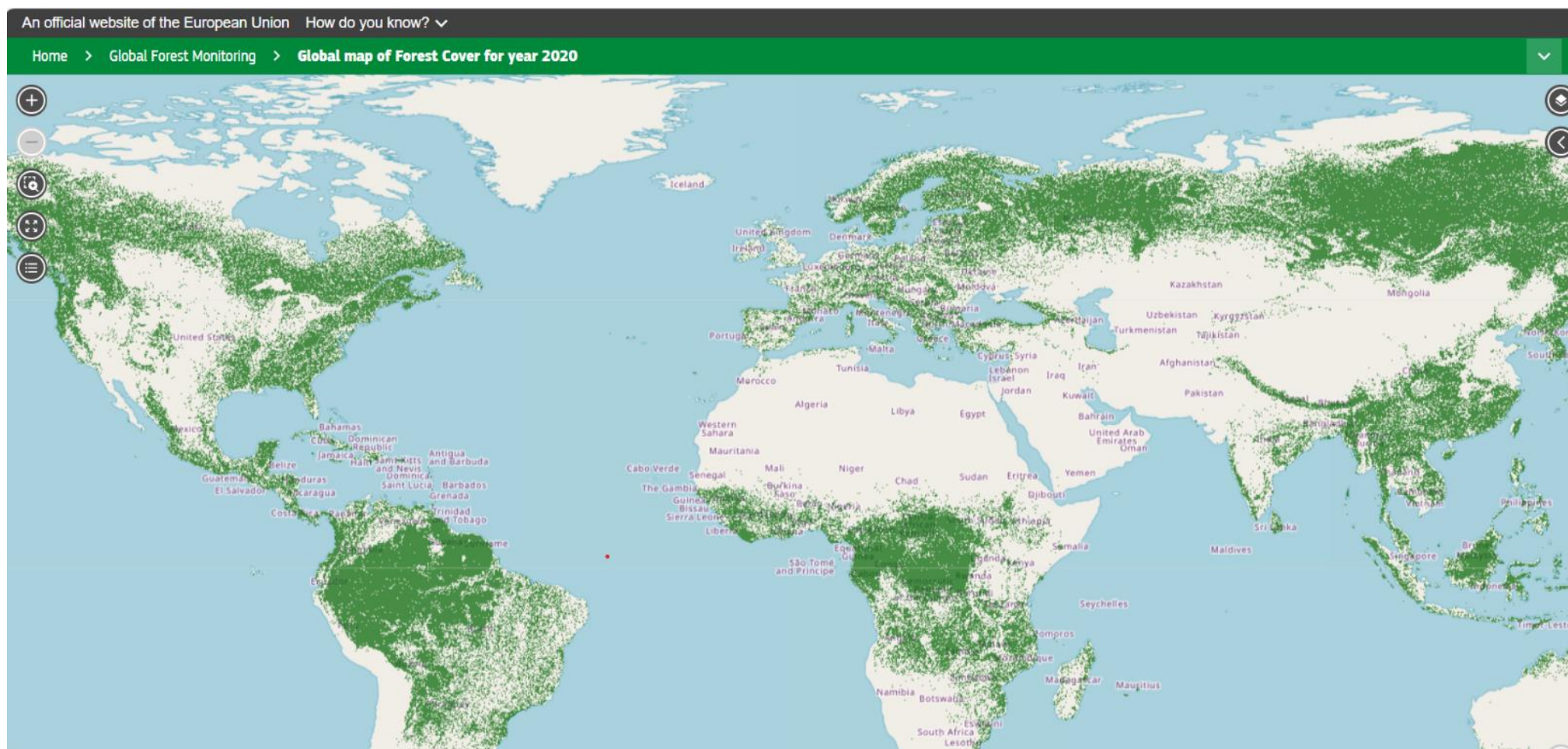
User support & training provided by EC

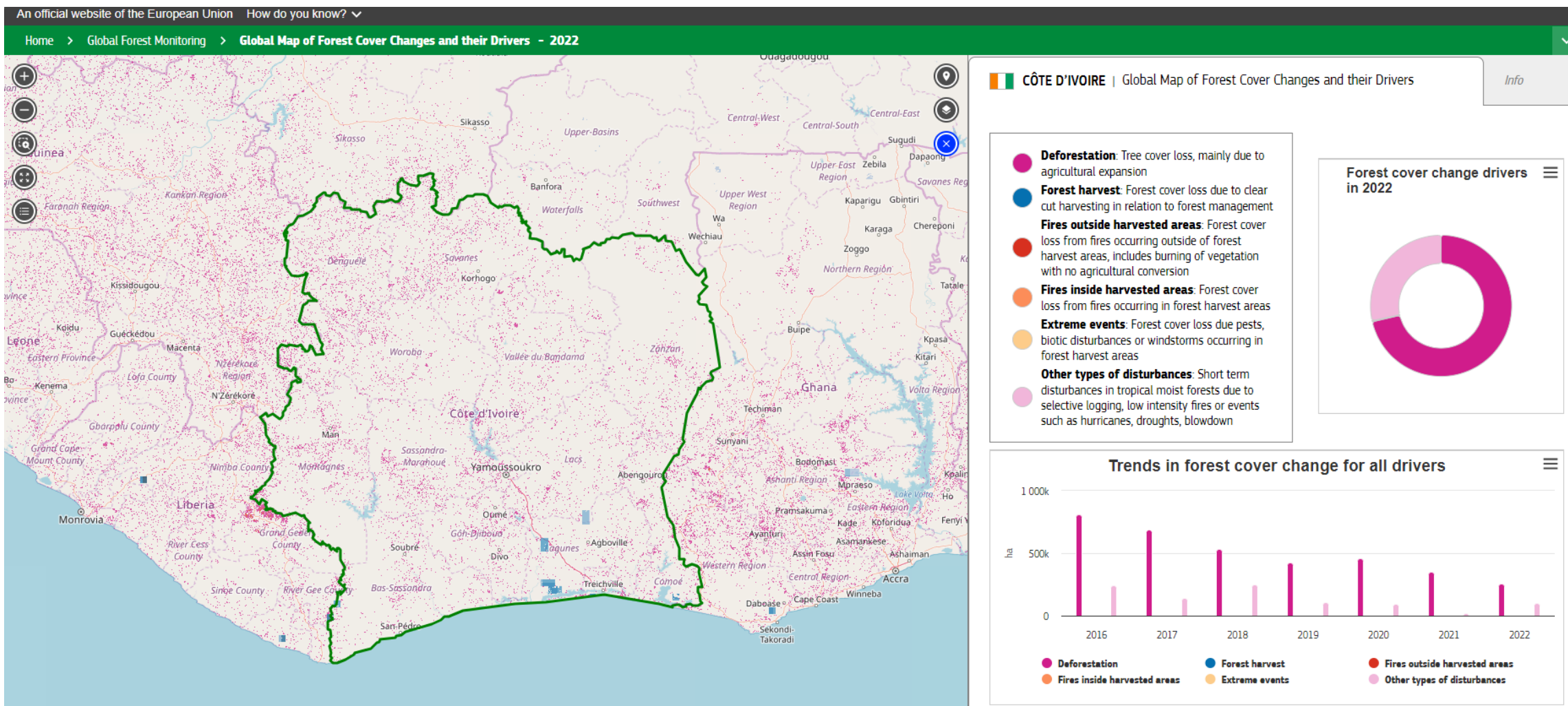
- Support
 - User instructions and support materials will be published online, including short videos for each specific set of functionalities
- Training
 - Hybrid hands-on end-user training will be provided in Brussels with online participation option
 - Member States representatives will also be trained as trainers to be able to provide training at national level
 - Training sessions estimated to be ½ day long



Current situation

- Benchmarking: in development
- EU Observatory on Deforestation and Forest Degradation
 - Global forest monitoring
 - Global map of Forest Cover for year 2020: updated version available in Q4
 - Global Map of Forest Cover Changes and their Drivers
 - Degradation: work to start in Q2, preliminary global forest type map available in Q4





Current situation

- FAQ:
 - EC: FAQ version 2, version 3 expected by...?
 - FPS HFCSE: FAQ translated into NL & FR
 - Available via Helpdesk
 - www.eudr.be
- Guidance document
 - Guidelines on placing on the market, operator, risk assessment, negligible risk, ...
 - Expected by ...?

Current situation

- Information :
 - EC website:
https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en
 - FPS website via www.eudr.be
 - Helpdesk : <https://biociden.freshdesk.com>
 - Ask questions by submitting a ticket

Helpdesk <https://biociden.freshdesk.com>

The screenshot shows the Helpdesk Biocides | Chemicals | Products interface. The header is dark blue with the logo on the left and 'Welkom Inloggen Aanmelden' on the right. Below the header is a navigation bar with 'Startpagina' and 'Oplossingen'. The main content area has a yellow background with the heading 'Wat kunnen we voor je doen?'. It features a search bar with the placeholder 'Voer hier uw zoekterm in...' and a 'ZOEKEN' button. To the right of the search bar are two links: '+ Nieuw ondersteuningsticket' and 'Ticketstatus controleren'. Below the search bar is a section titled 'Kennisbank' with a red underline. Under 'Kennisbank' is a sub-section 'Inleiding' with the text 'Welke informatie biedt deze kennisbank? (5)'. To the left of this text is a list of links: 'Wetgeving', 'Procedures', 'Richtsnoeren en andere informatie', 'Veelgestelde vragen en antwoorden', and 'Nuttige links'. To the right of the 'Inleiding' text is a section titled 'Nieuws & Evenementen (31)' with a list of links: 'Nieuwsbrief, e-News en sociale media (Bron: ...)', 'Nieuwsbrief biociden', 'Impact van Brexit op de biocidensector', 'Webinars (Bron: ECHA)', and 'Forum Biociden 2018 (8 november 2018 - FO...)'. At the bottom of this list is a link '>> Alle 31 artikelen weergeven'.

Helpdesk Biocides | Chemicals | Products

Welkom
Inloggen Aanmelden

Startpagina Oplossingen

Wat kunnen we voor je doen?

Voer hier uw zoekterm in... ZOEKEN

+ Nieuw ondersteuningsticket
Ticketstatus controleren

Kennisbank

Inleiding

Welke informatie biedt deze kennisbank? (5)


- Wetgeving
- Procedures
- Richtsnoeren en andere informatie
- Veelgestelde vragen en antwoorden
- Nuttige links

Nieuws & Evenementen (31)

- Nieuwsbrief, e-News en sociale media (Bron: ...)
- Nieuwsbrief biociden
- Impact van Brexit op de biocidensector
- Webinars (Bron: ECHA)
- Forum Biociden 2018 (8 november 2018 - FO...)

>> Alle 31 artikelen weergeven

Helpdesk <https://biociden.freshdesk.com>

 **Helpdesk Biocides | Chemicals | Products**

[Home](#) [Solutions](#)

Submit a ticket

Waarover gaat uw vraag? / Quel est le sujet de votre question? / Was ist das Thema Ihrer Frage? / What is your question about? *






Productnormen / Normes de prod. ▼

omtrent / concernant / bezüglich / concerning *

Andere / Autre / Other ▼

Onderwerp / Sujet / Subjekt / Subject *

Beschrijving / Description / Beschreibung *

B *I* U     

25 October info session rubber



SAVE THE DATE

Infosessies EUDR

Oktober : 9 - 16 - 24 - 25 November : 4 - 6

Brussel

 **Volksgezondheid**
Veiligheid van de Voedselketen
Leefmilieu



MEER INFO

https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en

<https://biociden.freshdesk.com>

www.eudr.be



eudr@health.fgov.be

Agenda



Intro



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ETRMA



EUDR State of the Art, Concerns and Solutions

Marta Conti, Director Public Affairs

ABOUT ETRMA

ETRMA TYRE COMPANY MEMBERS

Full Members (13)



Affiliate Members (2)



- 5 million tonnes of tyres are produced in European plants.
- Over 80 production facilities in Europe.
- More than 300,000 direct jobs dependent on the industry in Europe.

Sources:
ETRMA,
Eurostat



The European Rubber Goods Industry

The European Rubber Goods Industry – SMEs enabling the future

General rubber goods are used in the sky, deep in the earth and everywhere in between:

63%



Transport (automotive, rail, ships, aviation, aerospace, ...)

10%



Household appliances

8-10%



Industrial applications (construction, mining, agriculture, farming, machinery, ...)

10-12%



Energy/offshore

4-5%



Food contact (drinking water, baby care, medical devices, ...)

1-2%



Leisure and sports equipment



5% of the industry's annual investments are in **R&D**



> 6000 companies in Europe
98% SMEs



30 Billion turnover



~ 70000 direct jobs

Rubber is a material that is unique and strategic¹ that cannot be replaced





OUR VISION

To promote a competitive and innovative European tyre and rubber industry, advancing a **safe, smart** and **sustainable** society.

OUR MISSION

Representing the European Tyre and Rubber Industry and contributing to National, European and Global policy and decision-making processes;

Advocating the Industry's priorities and position by being a trusted and credible partner for decision-makers;

Supporting the frameworks to promote the sustainability and circularity of the Industry in Europe;

Striving to ensure that the critical economic, environmental and social contributions of the Industry are understood and recognised by our stakeholders; and

Promoting free and fair global trade and competition.





Agenda

1. EUDR Implementation: solutions needed by Industry

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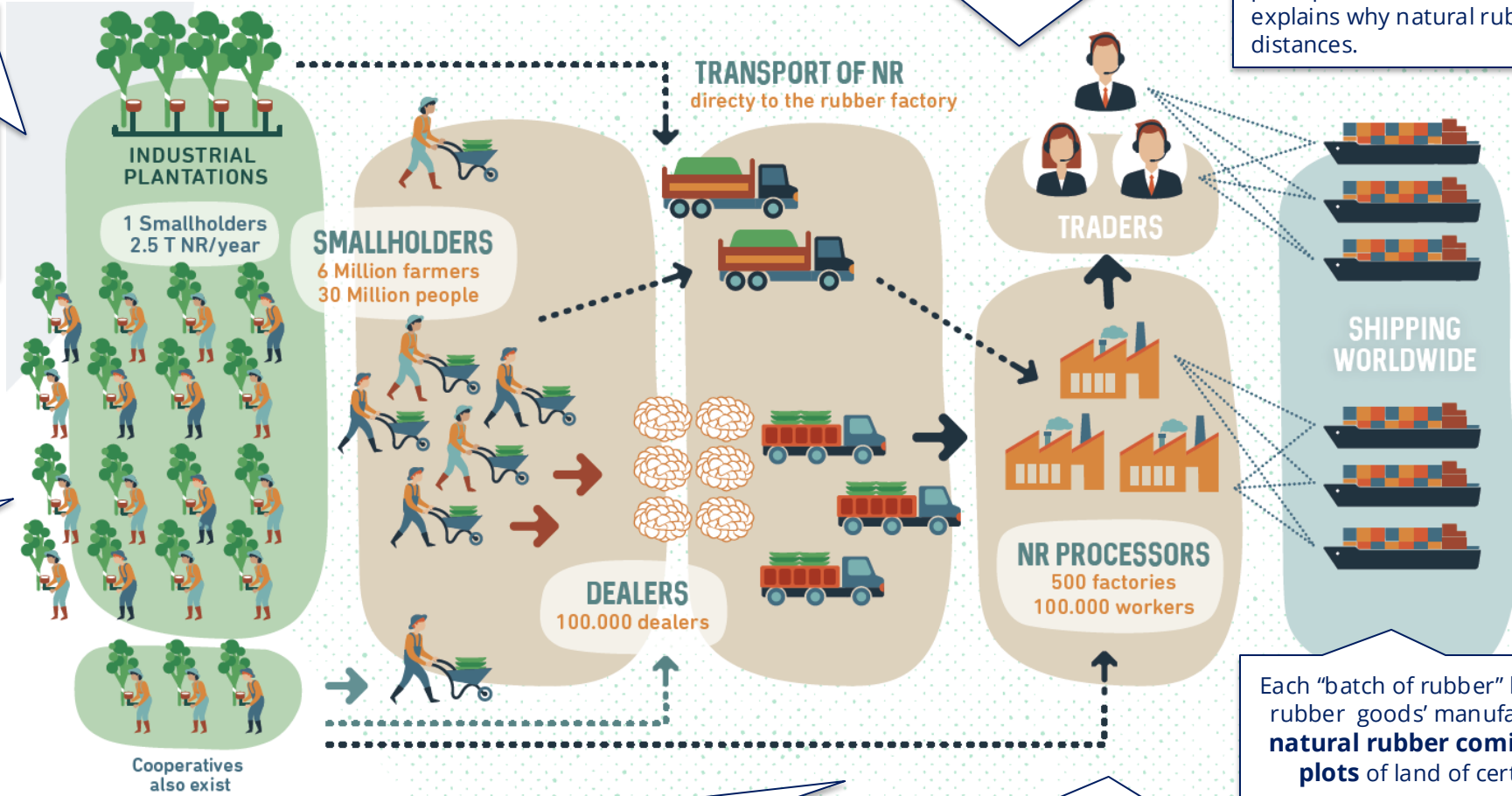


The Natural Rubber Supply Chain

The complexity of natural rubber supply chain in detail

The process is dynamic: **rubber latex harvesting is done every day**, and every day a smallholder decides, according to the variability of prices, to which dealer or processor to sell its production

< 3ha land each farm



After collection, the latex is refined and converted it into a raw natural rubber product. This is done by a **high number of processors** at local, regional, national and international levels before arriving to the tyre and rubber goods manufacturers.

Natural rubber's processor supply base zones are extensive. **80% of the raw material comes from a radius of 150-200 km** of the processor location, 15% comes from 200-500 km, and 5% comes from >500 km.

restrictions.



Figure 2- Blue bags of EUDR compliant rubber at collector in Hat Yai – Thailand 15 Feb 2024



Figure 4 EUDR-compliant RSS

What does ETRMA do in the context of EUDR



Internal work

- ✓ Analysis of the Regulation with legal support
- ✓ Monitoring of the state of implementation
- ✓ Gather questions and concerns from the industry
- ✓ Answer questions – where possible
- ✓ Propose solutions where answers are not forthcoming

Outreach

- ✓ To European Commission
- ✓ To competent authorities through its Members
- ✓ By participating in the EU Deforestation Platform
- ✓ By connecting with other Commodities
- ✓ By working with the Global Platform for Sustainable Natural Rubber (GPSNR) and supporting the development of guidance for PPTs.

Examples of helpful solutions from the European Commission



EC interpretations that help industry's implementation

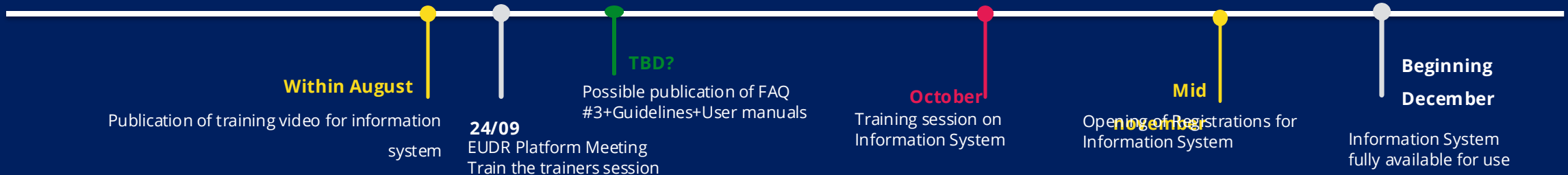
- ✓ Acceptable solution on tyre and rubber products **made in EU** during the transition period (29/06/2023-30/12/2024)
- ✓ Traceability in excess was allowed by the EC FAQ
- ✓ Information System Pilot Testing



Several issues remain

- Information system not fit for purpose and its implementation too slow: **system needs to be ready 6 months ahead of time for companies to adapt their system and train staff and be operative in the beginning of November.**
- NR **made and purchased during the transition period** needs to be allowed in EU market without being subject to EUDR requirements also after the implementation date.
- Tyres made during the transition period **outside the EU** should be allowed on the EU market **after implementation date** without being subject to EUDR requirements.
- **Reduce number of downstream DDSs** through periodic DDSs, not requiring further DDSs when a product moves within the same Group, exclude products entering the EU for R&D purposes.
- **Pragmatic legality screening:** it is legal unless proven illegal and, until then, on farm assessment is sufficient proof of legality.
- **Used products that would otherwise be discarded (e.g. carcasses for retreading) and recycled production waste need to be excluded from scope**
- **Find a solution for gaps of information created by the presence of SMEs in the supply chain.**

Where are we in the journey to implementation:



...In the absence of answers, we propose ideas for solutions

Information System

The information system, in its current form, is not fit for purpose, both in terms of the amount of data it can handle, its heavy reliance on manual operations and the lack of an API to manage relations with company's own systems.

The timeline for this operation as well as the absence of a second round of testing make industry very worried.



Companies need to test the updated system to adapt their internal systems to the one developed by the European Commission as well as time to train their staff globally



Derived products to be reported

Doubts regarding the need to report on stearic acid (for tyres) were already raised last summer, but no answer was ever received.



Confirm that derived products – such as tyres – would only have to report on the commodity they are derived from in Annex I (e.g., for tyres, natural rubber only – and not derived products from other commodities such as stearic acid, which is also present in tyres).

It is now too late to adapt the industry's supply chains to also include stearic acid – or indeed any other commodity beyond natural rubber – in the EUDR obligations of the rubber industry.

CONFLICTING INTERPRETATIONS WITH BIG CONSEQUENCES

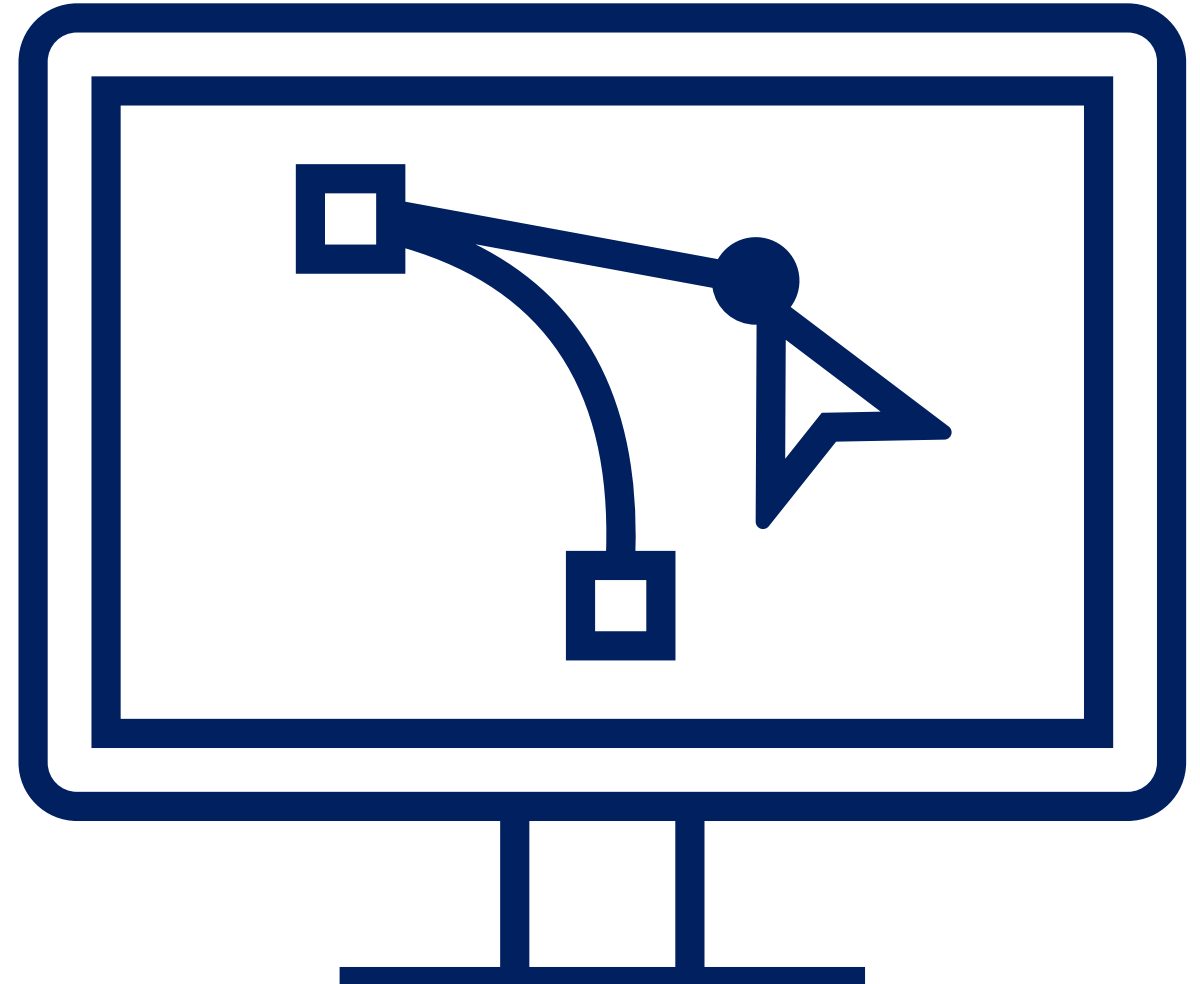
Placing on the EU Market

The 2022 Blue Guide has modernised the concept of placing on the market from the 2010 Timber Regulation.

It clarified that for products coming from third countries, the **physical presence on the EU market is not necessary for the product to be considered as placed on the market.**

The relevant product is placed on the EU market when an agreement is concluded for its sale and delivery to the EU and when the product is fully manufactured.

Given that the physical delivery to the EU is not required for the product to be considered to be placed on the EU market, it is possible “to place the product on the EU market” while it remains outside the EU. Such product would simply subsequently be “delivered” to the EU and subsequently made available to other distributors or customers.





Allow long transport time for NR

Natural rubber is mainly produced in Southeast Asia and it takes about six months to reach the EU market



We expect that rubber covered by a purchase order made during the transition period, which will reach the EU market after 30 December 2024, will not need to comply with EUDR obligations.

Level playing field for tyres produced outside the EU

The current interpretation given by the European Commission allows for natural rubber and tyres produced in Europe between June 2023 and 30 December 2024 (transition period), to be placed on the EU market after 30 December 2024 without having to show compliance with the EUDR.

Tyres placed on the EU market during the transition period can also be made available on the market after 30 December 2024 without having to show compliance with the EUDR.



The same should be granted for tyres produced outside the EU and placed on the EU Market after 30 December 2024, provided that their production date is before 30 December 2024 (this can be checked on the tyre sidewall).

Reduce the number of DDSs in the supply chain

Submitting a DDS for each transaction would create a huge administrative burden and would make enforcement difficult. As the same plots of land will be reported in several shipments, ETRMA would like to propose the following solutions:



Give the possibility to operators and traders to include several shipments (or transactions) in a DDS, provided that this DDS contains the geolocation coordinates of all the parcels of the relevant commodity/products concerned. The same DDS (identified by one number and one security token) will be used multiple times for a period of time (e.g. monthly).



Give the possibility to cover transactions within the same group with only one DDS that follows the products, until these are sold to a third entity, outside that Group.



Add guidance for DDS requirement for traders downstream the value chain to avoid an excessive and unnecessary declarations.



In cases where a product is imported by a company, including customs that are based outside the EU, confirm that only EU established entities should be covered under DDS obligation.



Exclude from the need of producing a DDS rubber materials and tyres sent to the EU for R&D purposes. These tyres will never be placed on the EU market for consumption and are often destroyed after the tests.



Provide pragmatic solutions regarding legality to prevent exclusion of smallholder farmers

Assurance of compliance with local regulation can be a complex task for smallholder farmers, particularly regarding land tenure.



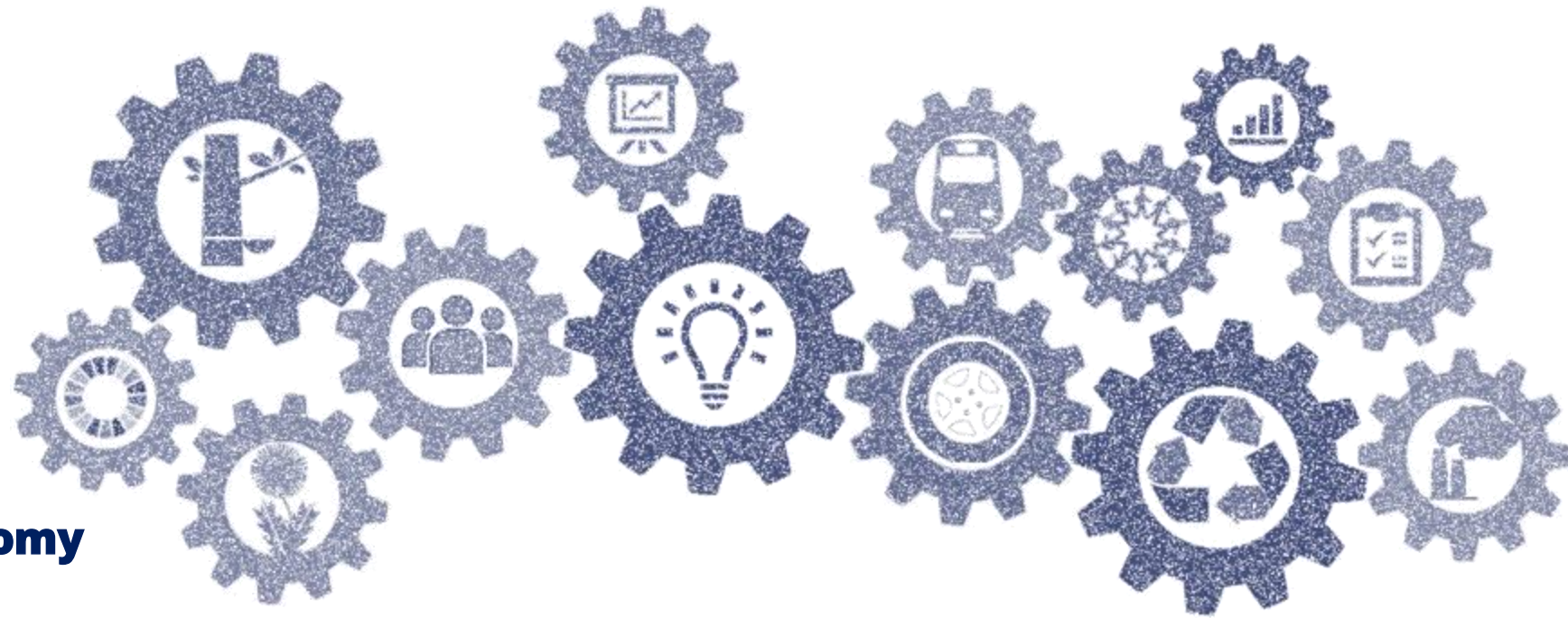
Allow that due diligence on land tenure focuses only on objective illegality screenings to identify plots of land in protected (e.g., national parks and wildlife reserves, etc) or restricted use areas (while respecting customary and native land tenure).



We also ask that the Commission confirms that 'tax, anti-corruption trade and customs regulations' be focused on corporate regimes (and not aiming at smallholders' personal situation).



Further to that, we seek confirmation that other legality elements such as labour and environmental laws, and human rights and FPIC risks can be tackled with on-farm assessments/surveys supplemented by spatial data where applicable.



Protect the circular economy



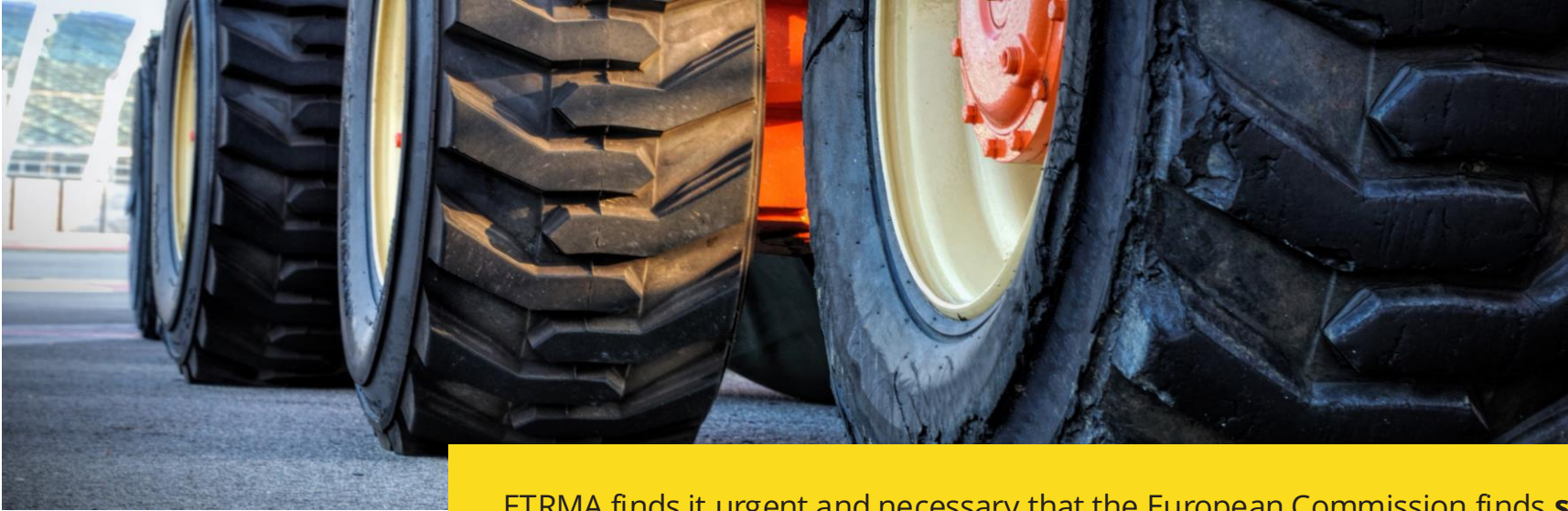
Confirm that production waste that is processed in or outside a facility and then reintroduced in the tyre mix would not have to follow the EUDR as well as tyre carcasses that are later used for retreading (in this case only the new tyre tread would have to be EUDR compliant).

Provide for the presence of SMEs in the tyre and rubber value chain



We propose that the Commission clarifies that SMEs will have to provide the DDSs' numbers and security tokens to the downstream operators and traders that request them. Should they be the first operator to place on the market a commodity or product, they will have to provide all the necessary information needed by the downstream operators – who will have otherwise no means to carry out to necessary due diligence requested by the regulation.

Conclusion



ETRMA finds it urgent and necessary that the European Commission finds **solutions to facilitate the efficient implementation of the regulation**, as outlined in previous ETRMA communications.

This will **help ensuring that all the available compliant natural rubber actually makes its way to Europe and its availability is not prevented by difficulties such as a non-functional information system, impossibility of importing tyres made during the transition period outside the EU, an excessive number of DDSs to be filed and limit to sustainable business models in circular economy, such as retreading activities in Europe.**

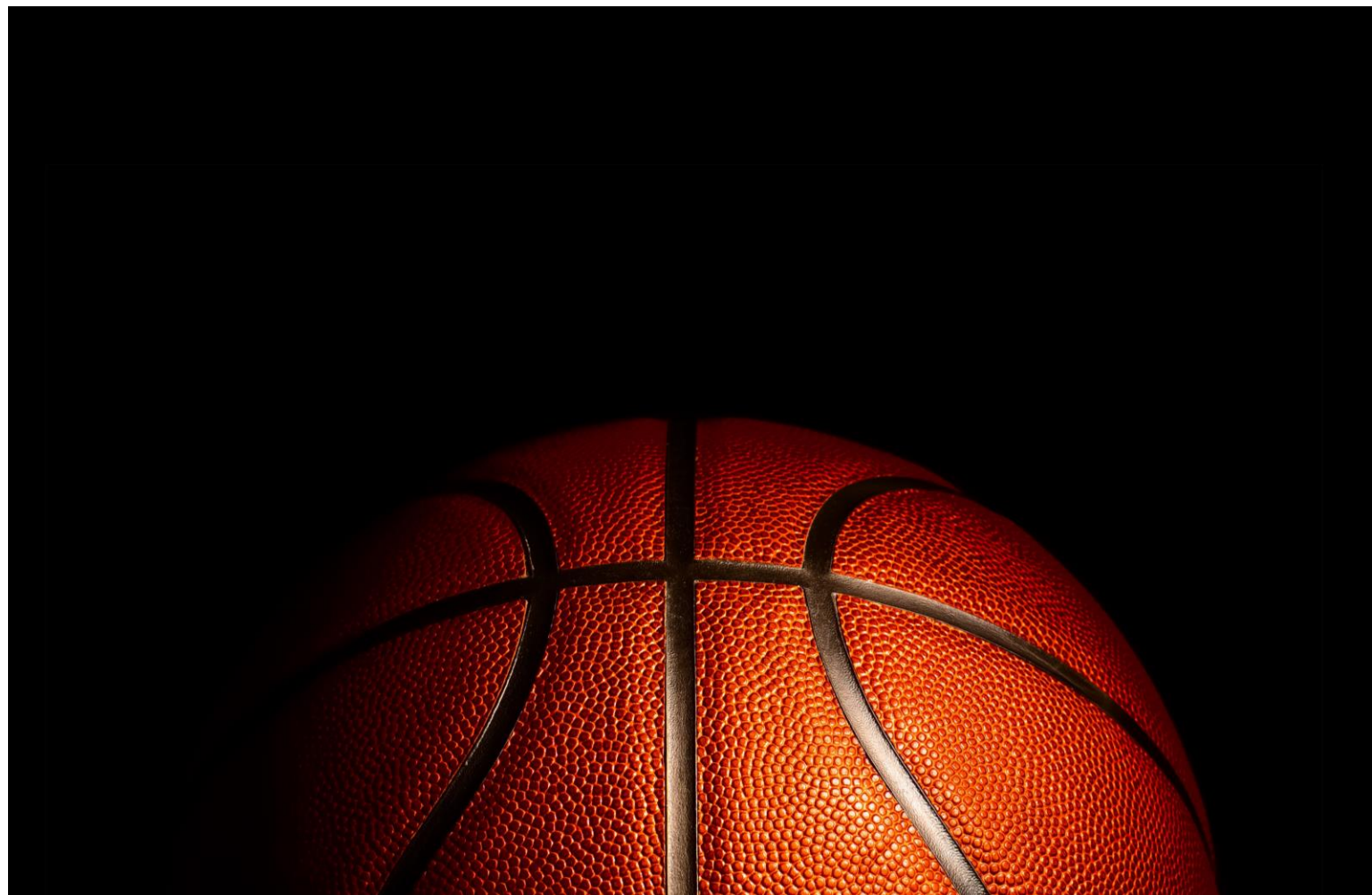
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Intro



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Veiligheid van de Voedselketen
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Législation et situation de l'EUDR



EUROPEAN
TYRE & RUBBER
manufacturers'
association

EUDR State of the Art, Concerns and Solutions



CORRIE MACCOLL
EST 1780

EUDR implementation status



Afsluiting en Q&A
Clôture et questions-réponses



EUDR

European Deforestation Regulation

Plantation / Small holder • Polygons • Shapefile • Geolocations • Due Diligence (DDS) • Traces • Operator •
Trader • Small and Medium-sized Enterprises (MKB)



CORRIE MACCOLL

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Holcyon Agri Corporation

EUDR

Implementation
status as per
05-09-2024





In short: no access to EU for

- Rubber from areas deforested after 31/12/2020
- Legality (child labour, landrights etc) not OK



About the EUDR (Regulation on
Deforestation-free products)

The regulation stipulates that
companies in Europe may
only place goods and products on the
market that do not
cause deforestation or forest
degradation.

In addition, it must be legally
produced.

Products originating from areas
deforested after 30 December 2020
may not enter the EU market
or be exported from the EU.



What does this mean for us?

All rubber & latex imported into or exported out of the EU by Corrie MacColl (CMC) needs to be EUDR Compliant.
Our roles will be as Operator and as Trader.

When?

All rubber & latex which is customs cleared by CMC after 30/12/2024

How?

CMC must be able to prove that the origin of the products is legal and traceably **not** from deforested areas.

CMC must do that with a system of due diligence requirements, called a Due Diligence System (DDS).

For the DDS, we need to take care of at least 4 things:

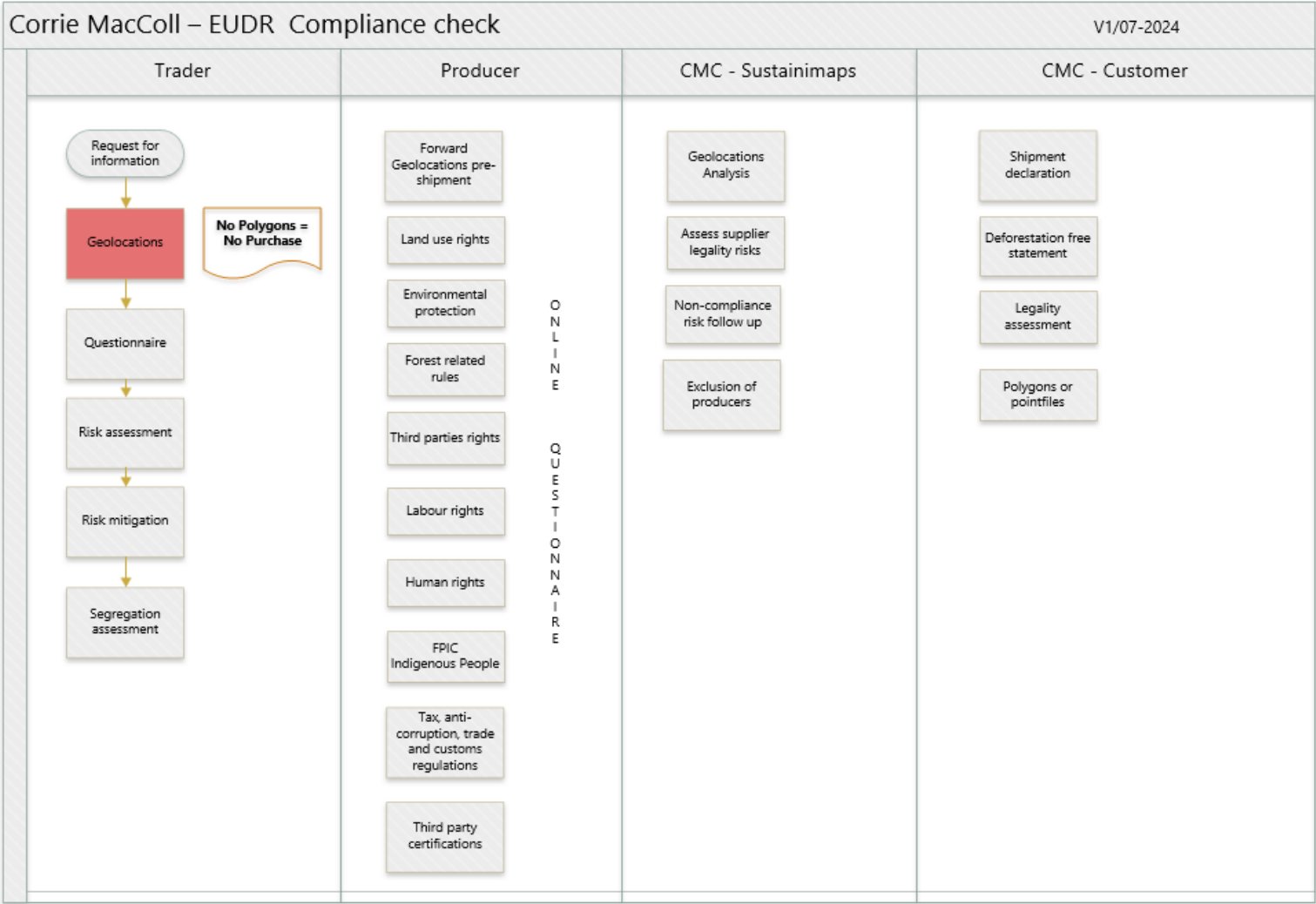
CMC collects data about the (legal) origin of the products => **legality**

CMC collects data about the geolocation where the product was grown and produced => **geolocations / polygons**

CMC carries out **risk analyses**, which allow us to estimate whether products contribute to deforestation or forest degradation.

CMC takes measures so that the risk of CMC trading illegal products is negligible => **risk mitigation**

Flowchart



Possible formats of Geolocations

ZIP

CSV

KML

KMZ

GEOJSON

JSON

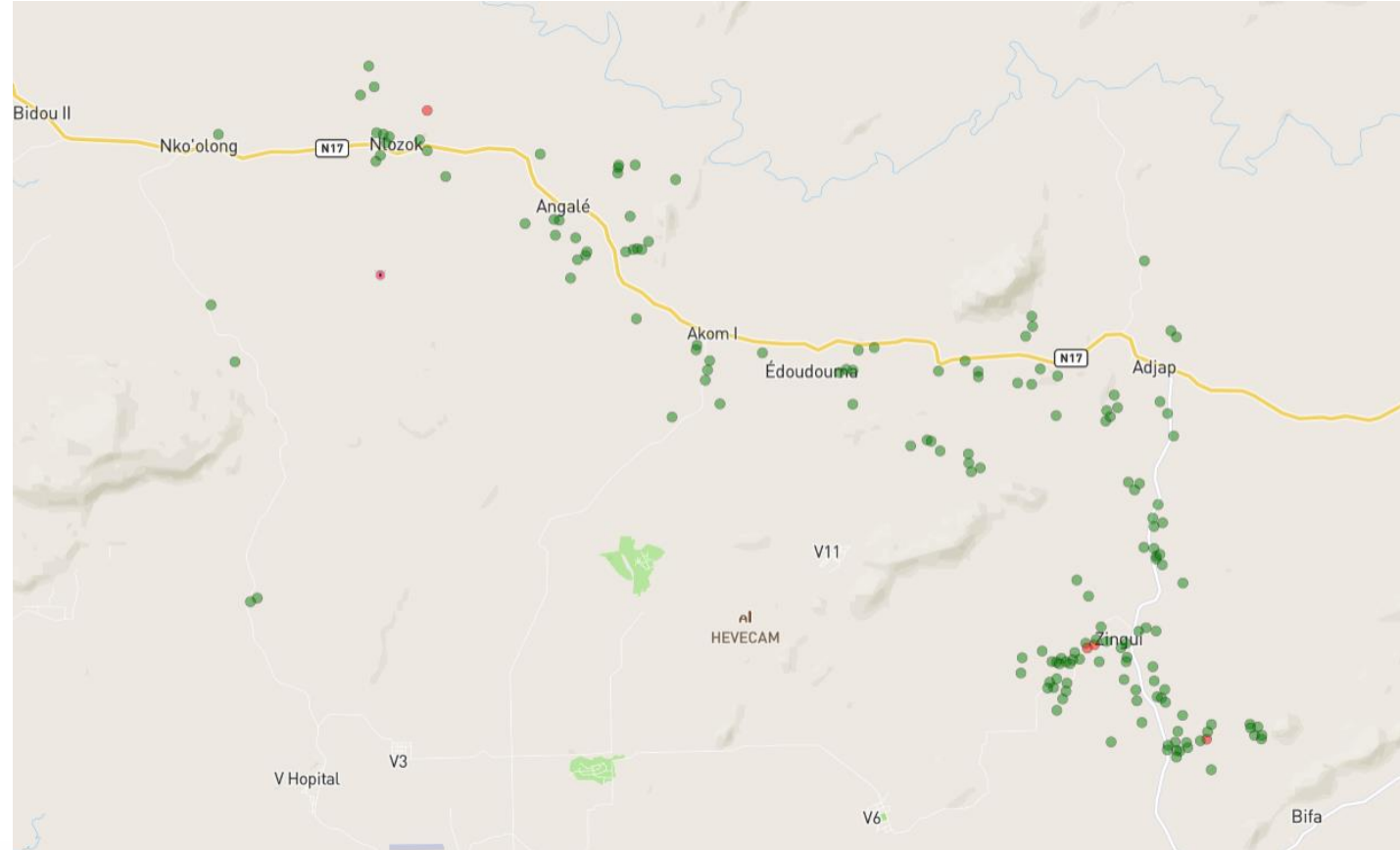
Geolocations

POINTFILES

POLYGON

COMBI POINT/POLYGON

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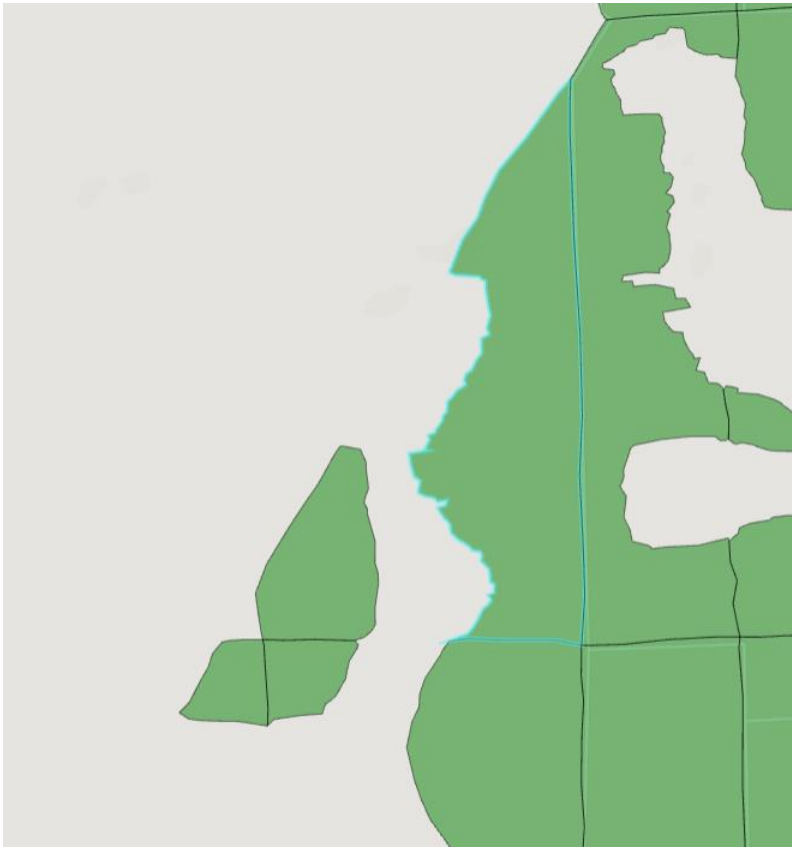


Example of Point files

Point files have at least 6 decimal places and a declared area



Example of Polygons



Example of Polygon

Details including Year of planting, Producers ID, Area

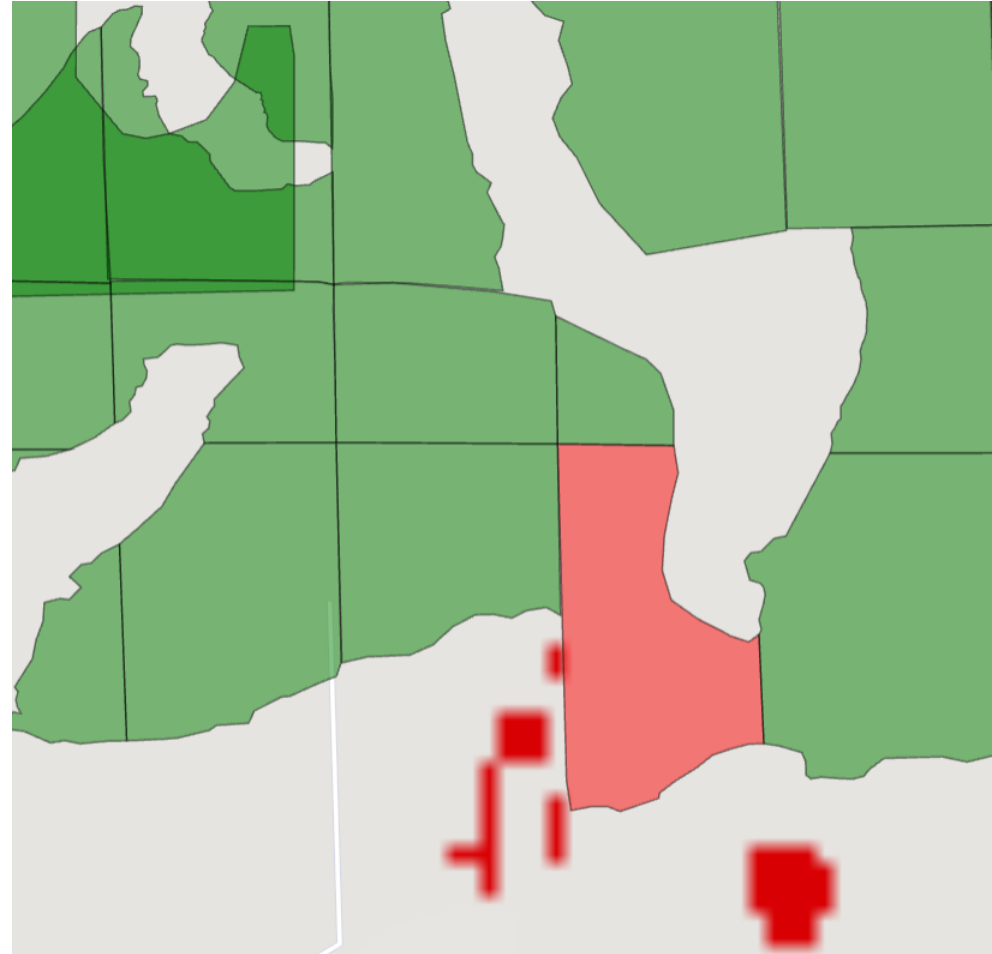
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Supply Chain	Sudcam
FID	51
Yop	2013
Clone	RRIM901
Source	KML
Stroke	#ff0000
New Area	13.256208
Parcel Nam	NC-05 C
Fill-Opacity	0.00000
Stroke-Opacity	1.00000
Reported Area	Not reported
Area (ha)	14.54

Locations showing forest loss according to the EU Map

Further investigation is needed

Contact with supplier

Could be bad boundary or error in EU map



Checking history (2017) in Google Earth Pro is showing no forest loss.

In the Sustainimaps system we can reclassify this location into EUDR compliant and keeping the Google Earth snapshot as evidence of the reclassification.



If all locations are EUDR compliant a Deforestation Free Statement will be produced by the system and uploaded into the EU system Traces



DEFORESTATION-FREE STATEMENT



Company: Corrie MacColl
Commodity: Natural Rubber Latex
HS Code: 40011000
Date Generated: 9-8-2024

Deforestation assessment was undertaken using proprietary techniques developed by Trade In Space. These techniques use open-source, freely available satellite data sources including the Joint Research Centre's Global Map of Forest Cover 2020¹ and the University of Maryland's Hansen et al. Forest Loss Layer². All sources of forest data were processed to the Food and Agricultural Organisation (FAO) definition of forest³. Defined as and with tree canopy cover of over 10% and an area of more than 0.5ha. Forests include natural forests and forest plantations.



Bounding Box: 12.342912, 1.121225, 12.425914, 2.238879

Deforestation has been identified based on the definition set out in EUDR Article 2 (3) as "conversion of forest to agricultural use." Geospatial analyses on the assets were performed to determine if there were any associated occurrences of forest loss. The user also had the option to assess whether assets were within the JRC defined forest limits. If an asset had point geolocation data, the user had the option to apply a buffer around each asset, equal to the average farm size in the country, polygons were analysed as provided.

1 <http://data.europa.eu/88n/f0d1b337-7d8-4038-048-686ed895b290>
 2 <https://globalwatchingw.app/view/global-forest-change>
 3 <http://www.fao.org/3/886615x/886615x.pdf>

Country: Cameroon

Supply Chain:

Number of Producers: 565

Area: 4599ha

Number of Points: 0 **Polygons:** 565

Buffer Size:

✓ Commodities have been produced in accordance with the relevant legislation of the country of production as defined in Article 2 (40)
 ✓ Commodities are deforestation-free as defined in Article 2 (13)



Agenda



Intro



Volksgezondheid
Veiligheid van de Voedselketen
Leefmilieu

EUDR wetgeving en stand van zaken
Législation et situation de l'EUDR



EUDR State of the Art, Concerns and Solutions



EUDR implementation status



Afsluiting en Q&A
Clôture et questions-réponses



Type bedrijven in EUDR

Micro onderneming
 \leq Omzet 700000,- euro
 \leq Balans 350000,- euro
 \leq 10 FTE's

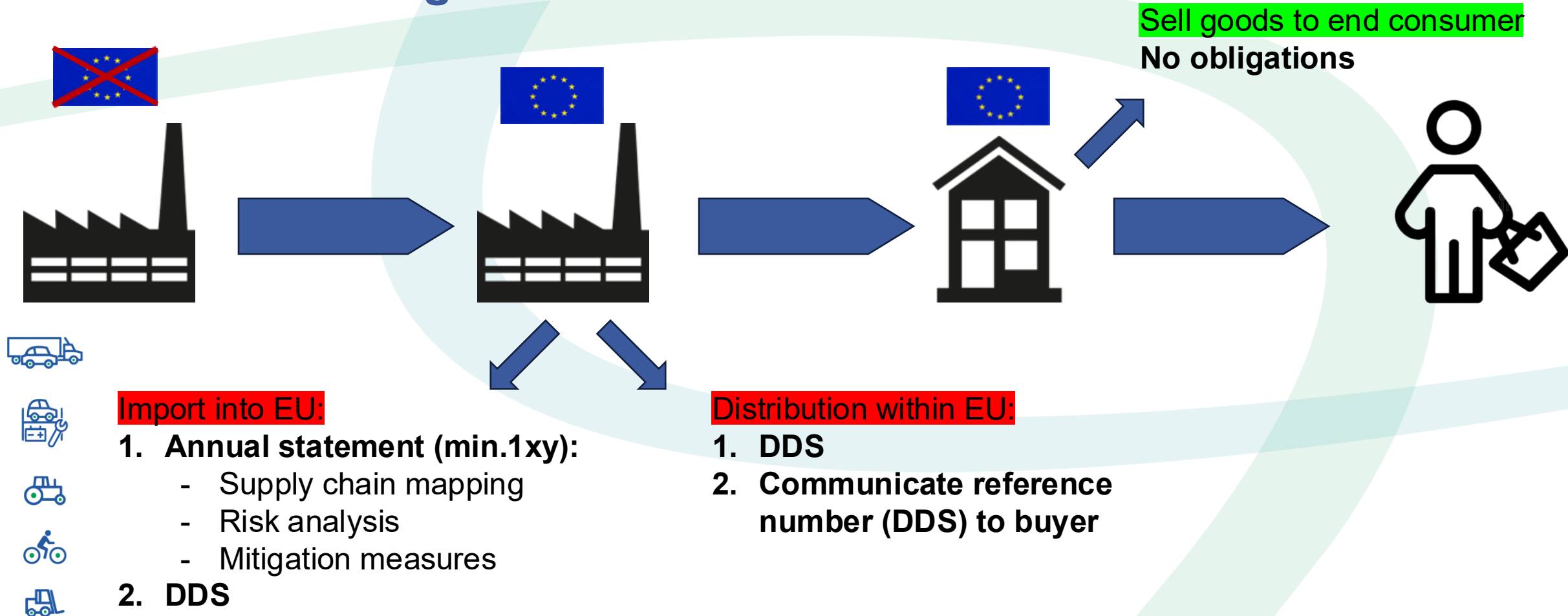
Kleine onderneming
 \leq Omzet 8 mln euro
 \leq Balans 4 mln euro
 $10 \leq 50$ FTE's

Middelgrote onderneming
 \leq Omzet 40 mln euro
 \leq Balans 20 mln euro
 $50 \leq 250$ FTE's

Grote onderneming
 $>$ Omzet 40 mln euro
 $>$ Balans 20 mln euro
 > 250 FTE's
2 uit 3



EUDR obligations

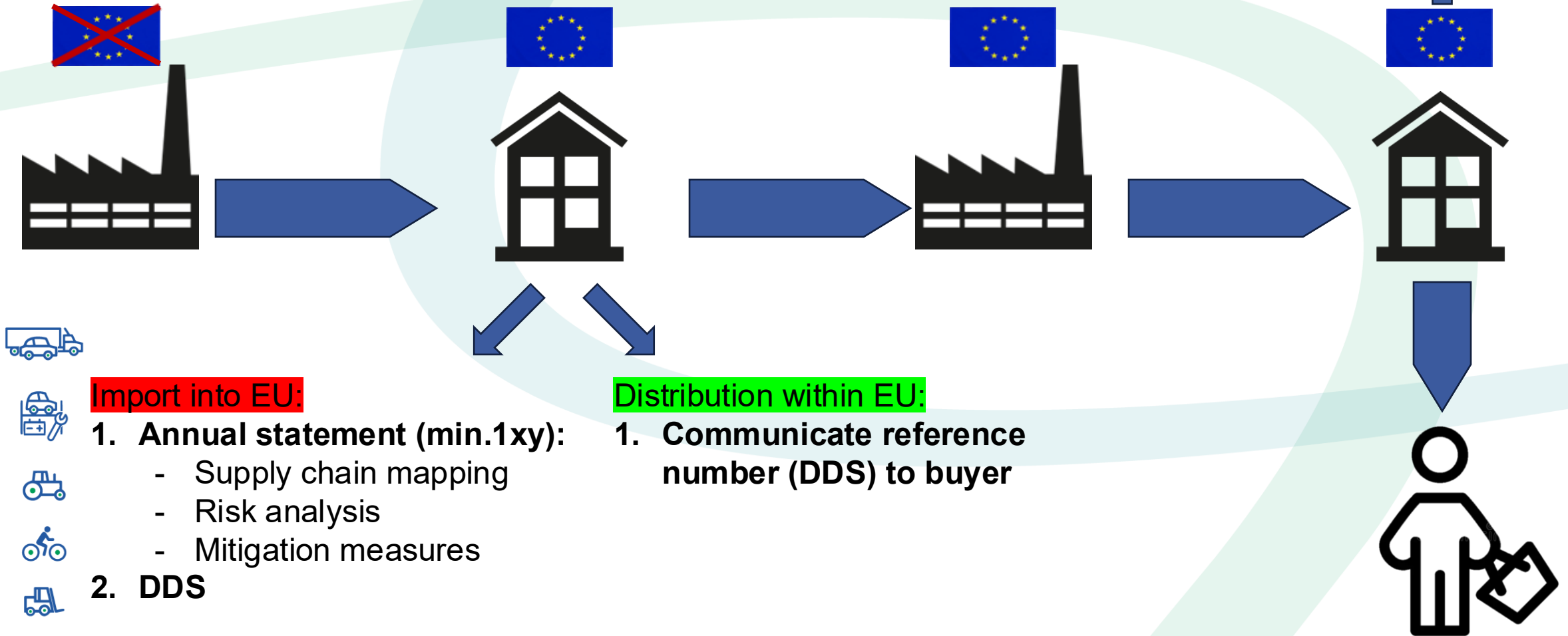


EUDR obligations

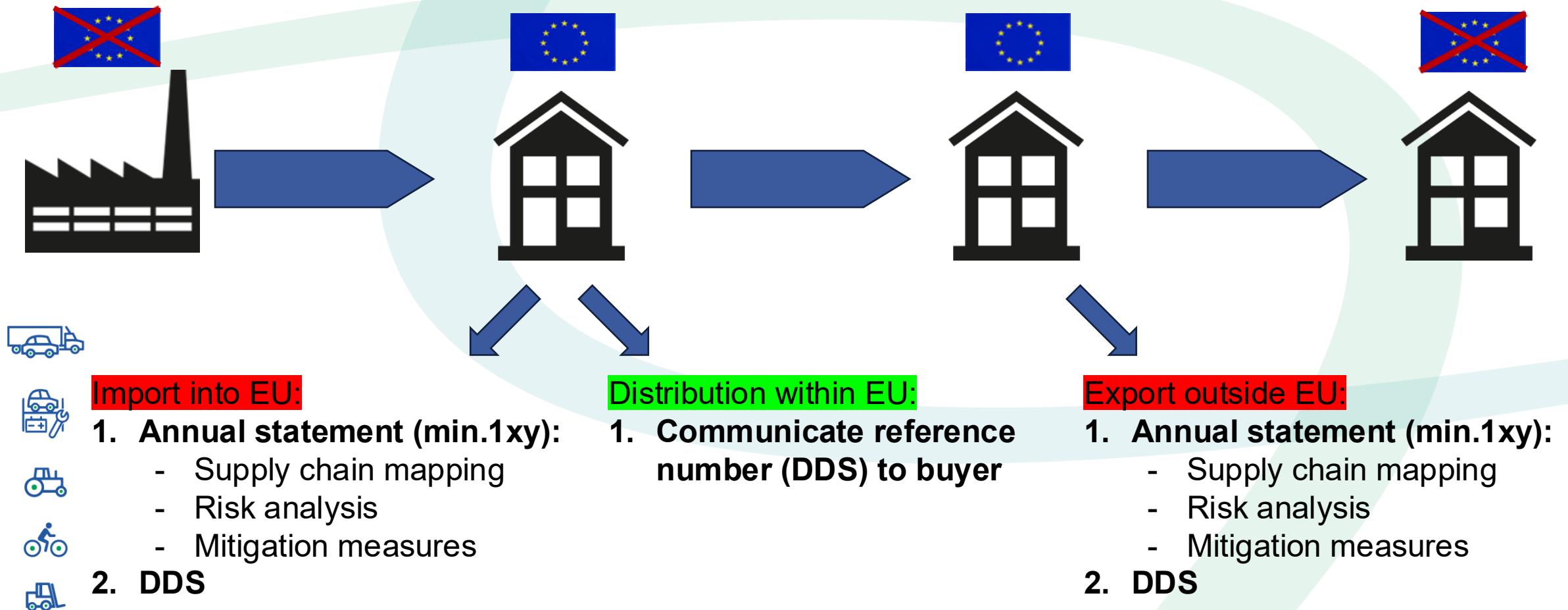
Distribution within EU:

1. Annual statement (min.1xy):
2. DDS
3. Communicate reference number (DDS) to buyer

Sell goods to end consumer
No obligations



EUDR obligations





Statement
Details

1. Reference Number

2. Activity

☐ Export ☐ Domestic ☒ Import

3. Operator/Trader name and address

Name ⓘ Apollo Tyres (EU) BV Valid

Country Netherlands ISO Code

4. Place of Activity

Country of activity: Netherlands (NL)

Country of entry: Netherlands (NL)

5. Communication for Competent Authority

Import NR for production tyres.

6. Commodity (ies) or Product(s)

Close

Created by {0} on

Save

TRACES – EUDR Information System


Dashboard ▾ Actors ▾ Reference Data ▾ Publications ▾ Help ▾ A...

Statement Details

1. Reference Number

3. Operator/Trader name

Name ⓘ Apollo

Country  Ne

5. Communication for C

Import NR for producti

6. Commodity (ies) or P

+Add Commodity or P

Close Created by {0} on Save

HS-Code

Please provide nomenclature code, section, species...

Search Unselect All

- + **01** LIVE ANIMALS
- + **02** MEAT AND EDIBLE MEAT OFFAL
- + **04** DAIRY PRODUCE; BIRDS' EGGS; NATURAL HONEY; EDIBLE PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED OR INCLUDED
- + **05** PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED OR INCLUDED
- + **09** COFFEE, TEA, MATÉ AND SPICES
- + **12** OIL SEEDS AND OLEAGINOUS FRUITS; MISCELLANEOUS GRAINS, SEEDS AND FRUIT, INDUSTRIAL OR MEDICINAL PLANTS; STRAW AND FODDER
- + **15** ANIMAL OR VEGETABLE FATS AND OILS AND THEIR CLEAVAGE PRODUCTS; PREPARED EDIBLE FATS; ANIMAL OR VEGETABLE WAXES
- + **16** PREPARATIONS OF MEAT, OF FISH OR OF CRUSTACEANS, MOLLUSCS OR OTHER AQUATIC INVERTEBRATES
- + **18** COCOA AND COCOA PREPARATIONS
- + **21** MISCELLANEOUS EDIBLE PREPARATIONS
- + **23** RESIDUES AND WASTE FROM THE FOOD INDUSTRIES; PREPARED ANIMAL FODDER
- **40** RUBBER AND ARTICLES THEREOF
 - + **4015** Articles of apparel and clothing accessories (including gloves, mittens and mitts), for all purposes, of vulcanised rubber other than hard rubber: ☐
 - + **4016** Other articles of vulcanised rubber other than hard rubber: ☒

1 element(s) selected.

Cancel Done



TRACES – EUDR Information System

6. Commodity (ies) or Product(s) *

+Add Commodity or Product

X Remove All

1

40 RUBBER AND ARTICLES THEREOF

4016 Other articles of vulcanised rubber other than hard rubber:

Remove

Commodity (ies) or Product(s) Description *	Net Mass (Kg) *	Volume (m3)	Supplementary Units
NR ST20	20000	32	

Scientific Name

Common Name

+

1 Hevea brasiliensis

Natural rubber

-

+ Add Production Place

Import

Export

1

Producer Name

Corrie MacColl plantation 001

Producer Country : *

Côte d'Ivoire (CI)

+

#	Production Place Description	Area *	Type *	Actions
---	------------------------------	--------	--------	---------



TRACES – EUDR Information System

JSONOnbewerkte gegevensHeaders

OpslaanKopiërenAlles samenvouwenAlles uitvouwenJSON filteren

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▼ properties:

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country:"CI"

type:"FeatureCollection"

▼ features:

▼ 0:

type:"Feature"

▼ properties:

▼ name:"Corrie MacColl plantation 001; Mankono street 23; Mankono"

area:11899.49

▼ geometry:

type:"Polygon"

▼ coordinates:

▼ 0:

▼ 0:

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▼ 1:

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▼ 2:

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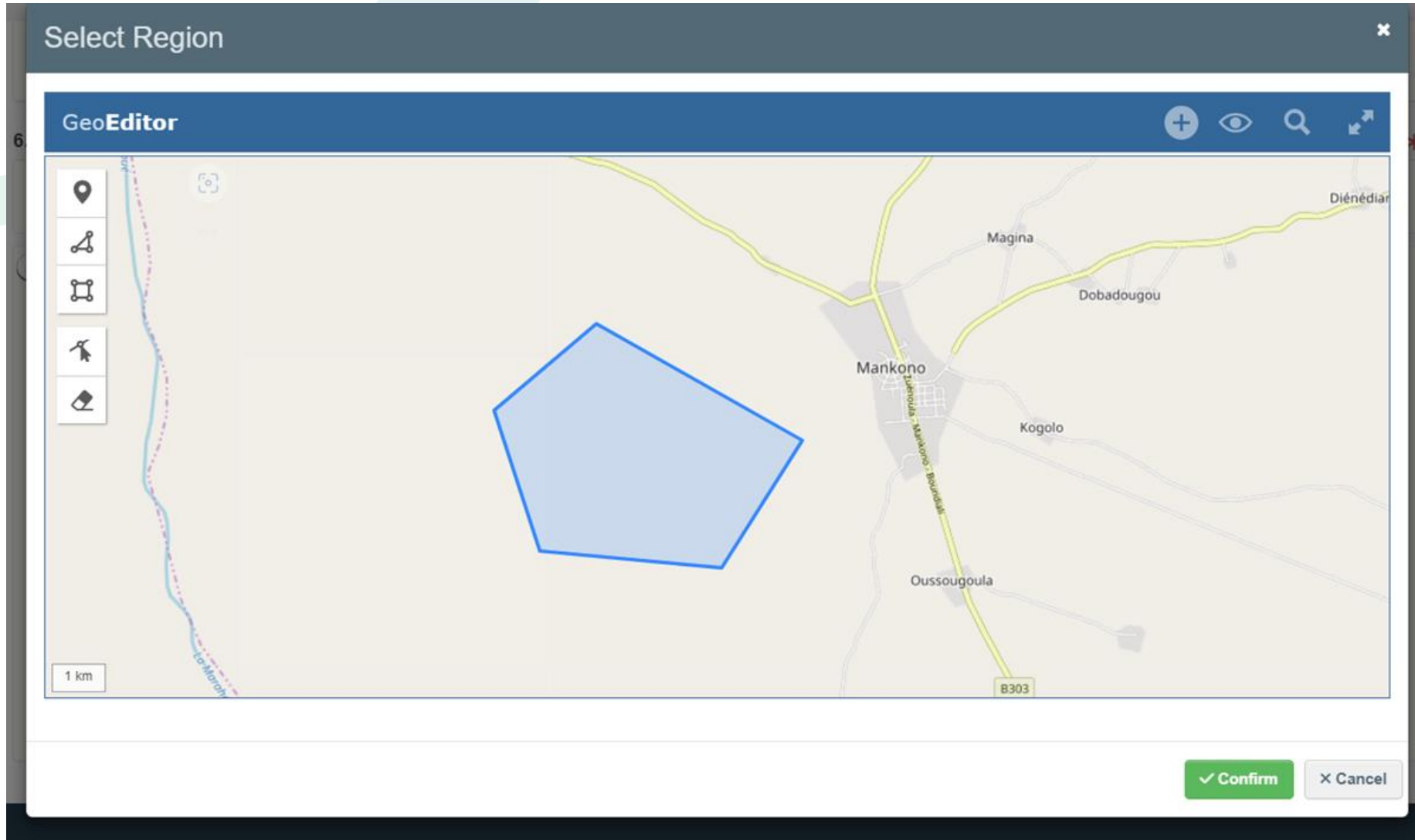
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TRACES – EUDR Information System



Search - Due Diligence Statement

[+ Create](#)

Search:

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Showing 6 / 6

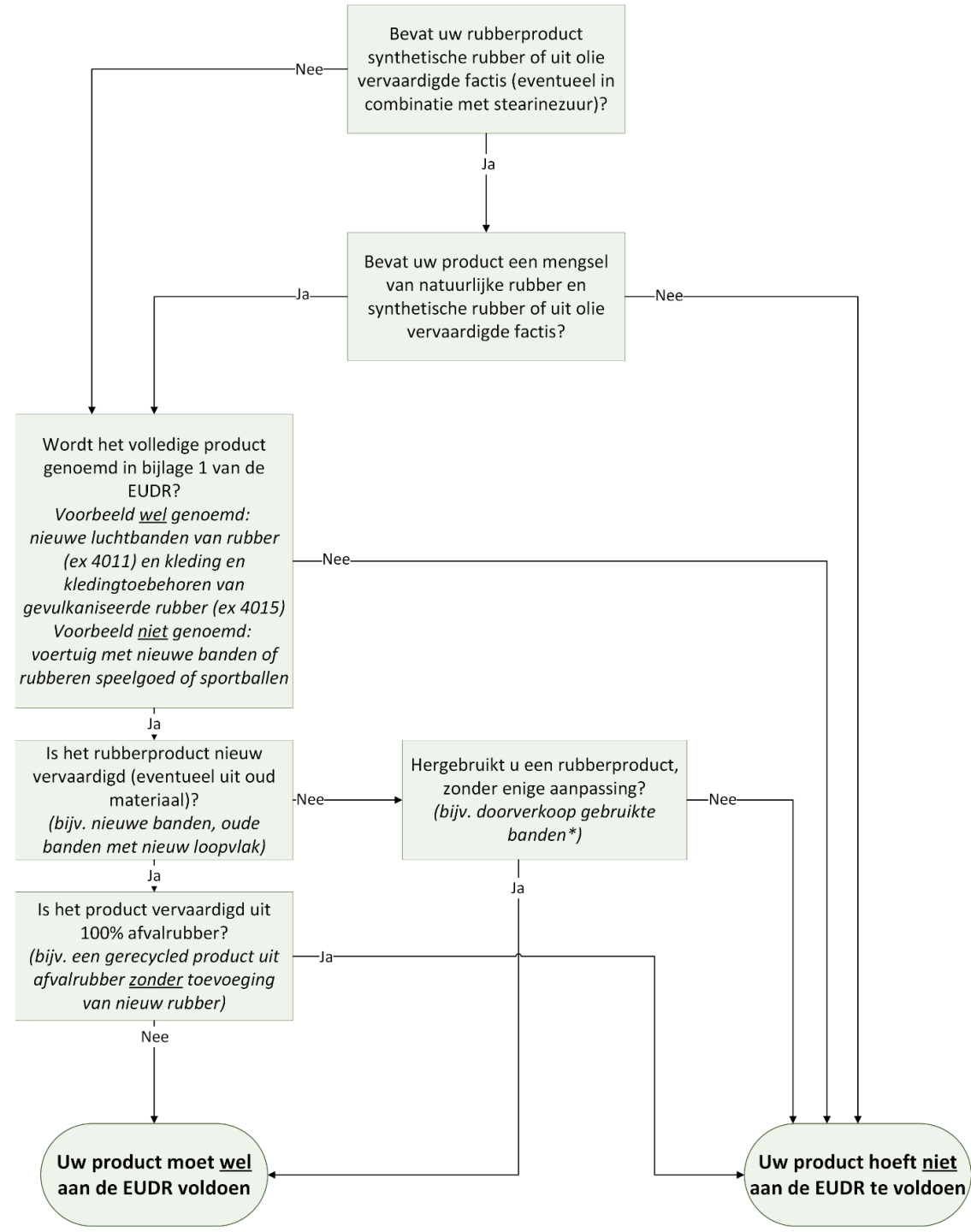
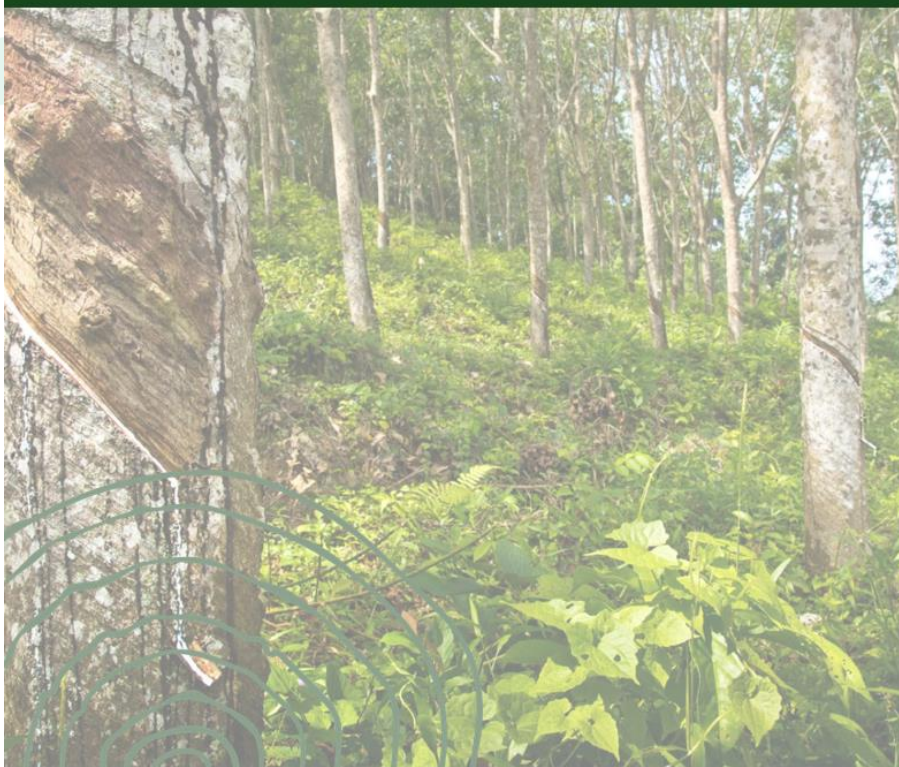
Reference Number	Company Internal Ref	Activity	Commodity (ies) or Product(s)	Status	Submission Date	
	HS003 🔗	Import	4016 Other articles of vulcanised rubber othe...	Submitted	12/01/2024 12:20	📄
🔖 24NLWOVHUZO28	export uk 🔗	Export	4016 Other articles of vulcanised rubber othe...	Available	10/01/2024 11:17	📄
🔖 24NLBYGS2Y6U26	HS001 🔗	Import	4016 Other articles of vulcanised rubber othe...	Available	10/01/2024 10:52	📄
🔖 24NLHSFAVM3X17	Tyre import 🔗	Domestic	4016 Other articles of vulcanised rubber othe...	Available	09/01/2024 16:12	📄
🔖 24NLXRJB8RPG16	Gevxyz 🔗	Import	4015 Articles of apparel and clothing accesso...	Available	09/01/2024 15:43	📄
	HS export 001 🔗	Export	4016 Other articles of vulcanised rubber othe...	Draft		📄



DUE DILIGENCE STAPPENPLAN VOOR DE RUBBERBRANCHE

HANDLEIDING OM TE VOLDOEN AAN DE EUROPESE ONTBOSSINGS-VERORDENING

Juli 2024



Q & A

