



The EU Deforestation Regulation

Trade and Investment Implications
for Sub-Saharan African Countries



The Commonwealth

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**Africa
Trade
Academy**

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Acronyms and abbreviations

AfCFTA	African Continental Free Trade Area
C.A.F.E.	Coffee and Farmer Equity
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COCOBOD	Ghana Cocoa Board
COMIFAC	Commission of the Forests of Central Africa
CSO	civil society organisation
DRC	Democratic Republic of Congo
ECCAS	Economic Community of Central African States
ECOWAS	Economic Community of West African States
EU	European Union
EUDR	EU Deforestation Regulation
FAO	Food and Agriculture Organization of the UN
FLEGT	Forest Law Enforcement, Governance and Trade
FSC	Forest Stewardship Council
GPS	global positioning system
ICCO	International Cocoa Organization
ISCC	International Sustainability and Carbon Certification
ITC	International Trade Centre
ITTO	International Timber Trading Organization
MSMEs	micro, small and medium-sized enterprises
NGO	non-governmental organisation
PAFC	Pan African Forest Certification
REDD+	Reducing Emissions from Deforestation and Forest Degradation in Developing Countries plus additional forest-related activities
RSB	Roundtable on Sustainable Biomaterials
RSPO	Roundtable on Sustainable Palm Oil
RTRS	Roundtable on Responsible Soy
SADC	Southern African Development Community
SNTBG	National Traceability System of Wood in Gabon

UK	United Kingdom
UN	United Nations
UNCBD	UN Convention on Biological Diversity
UNCCD	UN Convention to Combat Desertification
UNFCCC	UN Framework Convention on Climate Change
US	United States

Abstract

African countries continue to struggle with land degradation and desertification despite their adoption of various national, regional and international frameworks for sustainable environmental and land use practices. The EU, with the aim of reducing its global contribution to deforestation and forest degradation, introduced its Deforestation Regulation (the EUDR), which restricts products linked to deforested or degraded lands from entering or leaving the EU market. This study examines the economic effects of the EUDR on sub-Saharan African countries and their capacity to comply with the regulation. It suggests Africa could potentially lose US\$11 billion in annual exports as a result of non-compliance, with smallholder farmers the most vulnerable. To address these issues, the study suggests enforcing existing land use and environmental policies, building capacity at both policy and enterprise levels, providing technical assistance and ensuring co-operative EU engagement to adapt the EUDR to African contexts. It also recommends strengthening local processing industries, investing in agricultural research, developing regional value chains and leveraging the African Continental Free Trade Area to boost intra-African trade.

1. Background and Context

1.1 The extent of deforestation and land degradation in Africa

Africa faces significant challenges with regard to land degradation and desertification and is the most vulnerable and severely affected region globally. Currently, desertification affects approximately 45 per cent of the continent's land area, with 55 per cent of that land at high or very high risk of further degradation.¹ Also, Africa loses approximately 3.9 million ha of forest annually, with deforestation affecting both dry forests and rainforests.² The primary driver of deforestation is agricultural expansion, responsible for about 75 per cent of forest loss. This includes shifting cultivation, typically undertaken by subsistence farmers, whereby forests are cleared for farming to meet the demands of a growing population. Global trade and weak governance further drive deforestation, as rising demand for commodities like timber and agricultural products accelerates the destruction of forests across Africa.³

Desertification and land degradation in Africa affect about 485 million people, which translates to an annual economic cost of US\$9.3 billion.⁴ At its current pace, land degradation could render over half of the continent's agricultural area unusable by 2050.⁴ It also exacerbates existing challenges such as poverty, food insecurity and high mortality rates, often leading to further impoverishment, migration and conflict. As soils lose their structure and fertility, this has impacts on crop yields and livestock grazing, harming local livelihoods and economies.⁴ Ecosystem services, including carbon sequestration, wood production and wildlife habitats, also deteriorate, reducing the availability of resources like medicinal plants, groundwater recharge and tourism opportunities. In addition, desertification causes regional issues such as dust storms, altered water flows and pollution, while globally it affects the climate, food security, human health and political stability.⁵ Land degradation also causes river and dam siltation, which affects water availability and food security.

At a continent-wide level, countries in Africa have collaborated to implement a number of initiatives to combat deforestation and promote sustainable land management. One key framework is the

African Union's Agenda 2063, which emphasises sustainable land practices as a means of driving socio-economic transformation. Meanwhile, the African Ministerial Conference on Environment serves as a platform for African ministers to co-ordinate and discuss policies related to environmental issues, including deforestation. The Malabo Declaration encourages sustainable land practices and 'agripreneurship'. The Green Wall for the Sahara Initiative is another significant effort aimed at combating desertification. Regional policies such as the East African Community Climate Change Policy further support these goals. On a national level, countries have developed frameworks like Nationally Determined Contributions and National Adaptation Plans to guide their actions against deforestation, ensuring a comprehensive approach to environmental challenges.

Regardless of the initiatives African countries have taken to combat deforestation and forest degradation, many advanced countries have considered using their own policies and buying power to address the challenge. In recent times, the EU, the US and the UK have considered, mostly unilaterally, the implementation of trade measures to control deforestation and forest degradation on the African continent and elsewhere.

The EU has been the first to fully roll out such a measure, through its Regulation on Deforestation-Free Products, also known as the EU Deforestation Regulation (EUDR) and Regulation (EU) 2023/1115. The EUDR aims to prevent the placement within the EU market or the export from the EU of any products resulting from deforested or degraded land. The EU views this regulation and others as key to minimise its contribution to deforestation and forest degradation worldwide, and thereby to help reduce global deforestation.

Proposed in 2021, the EUDR came into force in June 2023 and covers seven commodities – cattle, cocoa, coffee, palm oil, rubber, soya and wood – and about 70 derivative products, from beef to paper pulp. Producer countries of the covered commodities in the global south have expressed concern regarding the EUDR, claiming that it represents a disguised barrier to trade and that it will

be unilaterally designed and implemented by the EU without consultations with the countries involved.

The UK and the US have both contemplated similar measures. The UK has proposed the Forest Risks Commodities regulations, aimed at minimising deforestation and degradation by prohibiting the utilisation by larger companies of agricultural commodities produced from deforested or degraded land. The aim is to introduce due diligence requirements on companies importing to the UK. Though yet to be enacted, the proposed legislation will cover non-dairy cattle products (beef and leather), cocoa, palm oil and soy. So far, the proposed legislation has gone through consultations within the UK.

In 2021, the US proposed the Fostering Overseas Rule of Law and Environmentally Sound Trade Act to ban commercial imports of products linked to illegal deforestation such as meat, soy, palm oil, cocoa, rubber and wood pulp. In addition to prohibiting products linked to illegal deforestation, the bill classifies illegal deforestation as a specified unlawful activity under a federal financial crime statute; establishes a federal procurement preference for commodities that are not produced from land subject to deforestation; and provides funding to assist foreign governments in combating illegal deforestation.

The EUDR and the instruments contemplated by the UK and the US have implications for countries in Africa that depend on the covered products for export earnings and foreign exchange, and that have millions of citizens working as producers in these supply chains.

1.2 Study objective

This study assesses the trade and investment implications of the EUDR for sub-Saharan African countries, focusing on the ramifications of the EUDR for their economies and the capacity for both the public and the private sectors to fully comply with the regulation. The study specifically:

1. assesses the perspectives of African countries on existing and emerging environmental and trade related measures of the EU, UK and US;

2. assesses the perspectives of African countries on the EUDR design and implementation;
3. evaluates the implications of the EUDR for Africa, focusing on the covered commodities;
4. assesses African countries' preparedness to respond to the requirements of the EUDR;
5. identifies capacity gaps related to implementation of the EUDR at the policy and operational (enterprise) levels;
6. proposes recommendations, including training, technical assistance and capacity-building, and response options (policy and operational) for sub-Saharan African countries in response to the EUDR and other upcoming trade and environment-related measures.

1.3 Methodology

The methodological approach adopted to complete this study included:

1. an extensive literature review of the EUDR design, implementation and impacts on sub-Saharan Africa;
2. a survey of policy-makers and private sector representatives in sub-Saharan African countries (key commodity producers) to assess their concerns, perceptions and capacity gaps in relation to the EUDR as well as response/adaptation mechanisms they are putting in place to meet the requirements of the EUDR;
3. a draft report summarising findings in relation to the implications, perceptions and views of key stakeholders in sub-Saharan Africa on the EUDR and detailing capacity gaps and recommendations to enhance the level of preparedness on the continent to respond to the requirements of the EUDR;
4. the proposal of recommendations and the development of training resources to improve the policy and operational responses of policy-makers and the private sector in Africa to the EUDR and similar regulations.

2. Overview of the EU Deforestation Regulation

The European Green Deal (EGD) was introduced in December 2019 as the EU's new growth strategy, focusing on making the EU a fair and thriving society. It seeks to establish a modern, resource-efficient and competitive economy with zero net greenhouse gas emissions by 2050, while decoupling economic growth from resource consumption. Also, the EGD aims to safeguard, preserve and improve the EU's natural capital and protect citizens' health and well-being from environmental risks. This transition is intended to be both just and inclusive. The EGD is a revived EU approach to achieve the UN's 2030 Agenda and the Sustainable Development Goals,⁶ and the 2015 Paris Agreement on Climate Change within the EU and also across the globe.

The EUDR on deforestation-free supply chains is a key element of the EGD. It is part of a wider framework established by the EGD, the EU Biodiversity Strategy and the Farm to Fork Strategy, all of which together constitute the foundation of the EU's environmental governance efforts.⁷ The EUDR is a regulatory framework designed to ensure that products consumed within the EU do not contribute to deforestation or forest degradation globally. It came into force on 29 June 2023.⁸ Promoting the use of 'deforestation-free' products is anticipated to reduce greenhouse gas emissions and curb biodiversity loss. This approach aligns with the EU's international commitments, including those under the UN Framework Convention on Climate Change (UNFCCC), the Paris Agreement, the UN Convention on Biological Diversity (UNCBD) and the Kunming-Montreal Global Biodiversity Framework, as well as the Sustainable Development Goals and the UN Declaration on the Rights of Indigenous Peoples.⁹ The EUDR, which repeals the EU Timber Regulation, has three main objectives.¹⁰

1. Prevent the listed products that Europeans buy, use and consume from contributing to deforestation and forest degradation both within the EU and globally.
2. Reduce carbon emissions resulting from the EU's consumption and production of these commodities by at least 32 million metric tonnes annually.

3. Address all forms of deforestation driven by agricultural expansion for the production of the commodities covered, as well as forest degradation.

2.1 Key elements of the EUDR

The EUDR regulates seven primary commodities ('relevant commodities') – palm oil, cattle, soy, coffee, cocoa, timber and rubber – as well as their derived products ('relevant products'), such as beef, furniture and chocolate (see Figures 2.2 and 2.3). It applies to all quantities of these products, whether large or small.¹¹ It also introduces new requirements concerning traceability and risk assessment and mitigation that significantly surpass the scope of previous EU legislation.⁹ The regulation provides for the possibility of modifying the list of commodities and products, potentially broadening the scope to include more items.⁹

The EUDR mandates that any company involved in the import or export of specified commodities from the EU must demonstrate that the products are deforestation-free. This requirement applies universally to all companies, whether based within the EU or outside it, and covers both legal and illegal sources of deforestation in Europe and abroad. A product is considered deforestation-free if neither it, nor its ingredients, nor its derivatives were produced on land that has been subject to deforestation or forest degradation.¹² The regulation will be applicable to all products entering the market starting 30 December 2024, with a delayed implementation date of 30 June 2025 for small businesses (see Figure 2.1).¹¹

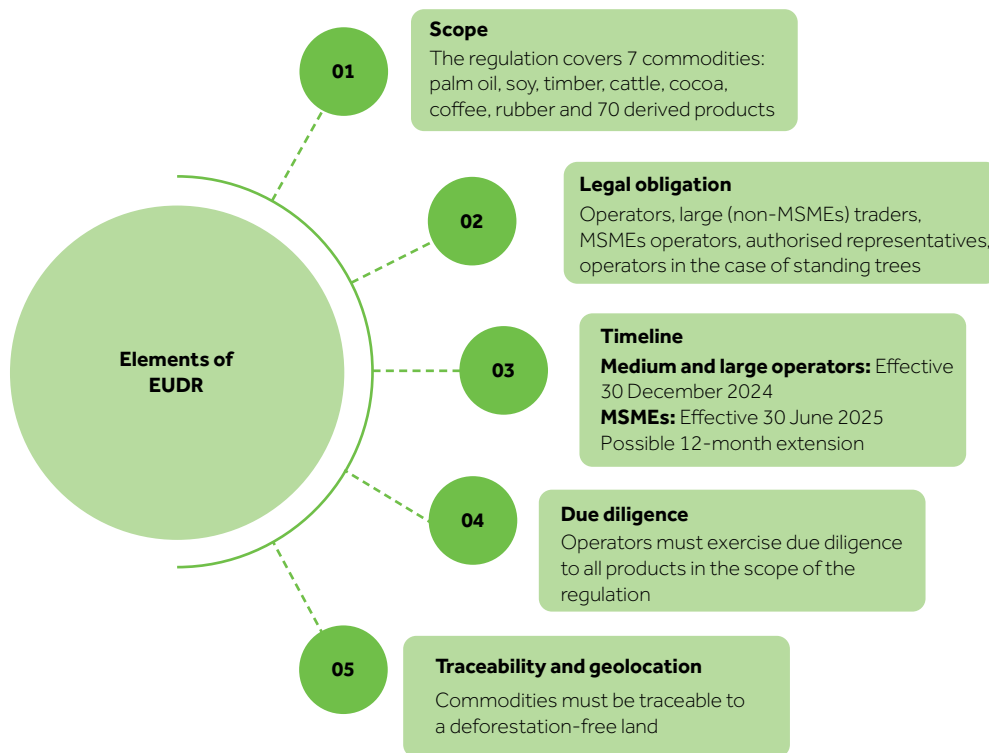
The EUDR imposes varying requirements on three categories of companies based on their role in the market and their size. First, 'operators', which include companies that first place products containing or made with in-scope commodities on the EU market or export them, are subject to the same due diligence obligations regardless of whether they fall under the category of micro, small and medium-sized enterprises (MSMEs) or not. Second, downstream operators', which transform a product already available on the EU market

Figure 2.1 Timeline of the EUDR. The EU is currently proposing a 12-month extension to the implementation of the EUDR.



Source: European Commission (2024).

Figure 2.2 Elements of the EUDR.



Source: European Commission (2024).

from one in-scope customs code to another, face different obligations depending on their size, with distinct requirements for non-MSME downstream operators. Third, 'traders', such as retailers, which make in-scope products available on the EU market, have different due diligence obligations based on their size, with non-MSME traders subject to different requirements to those facing MSME traders (see Figure 2.4).⁹

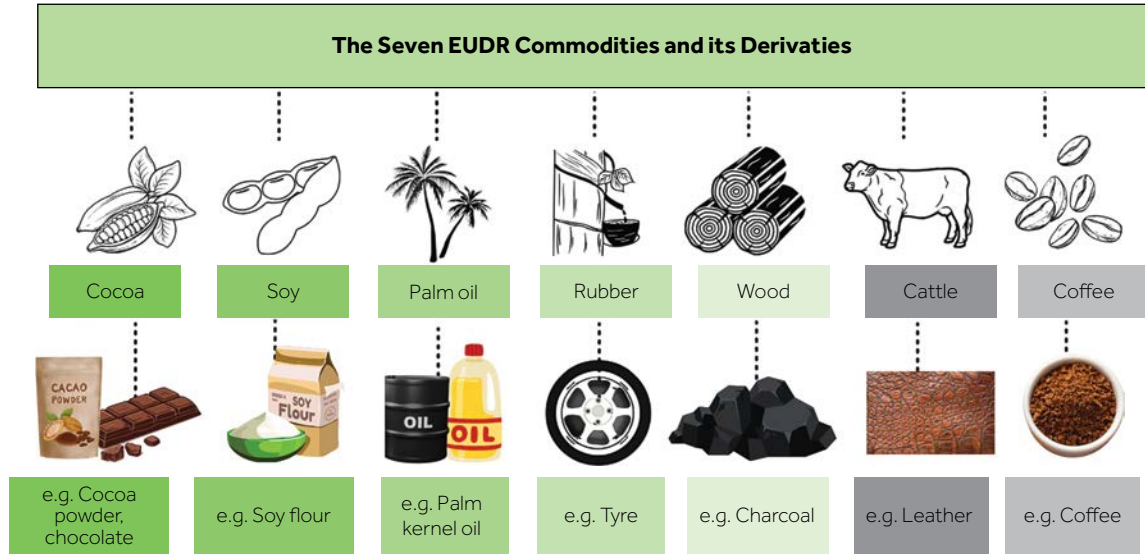
The EUDR sets three key requirements for the placement or export of relevant commodities and products: each commodity or product must be deforestation-free, produced in compliance with

the laws of the country of origin and accompanied by a due diligence statement. If these conditions are not met, the EU prohibits the market placement or export of the commodity or product.⁸

2.2 Requirements for businesses

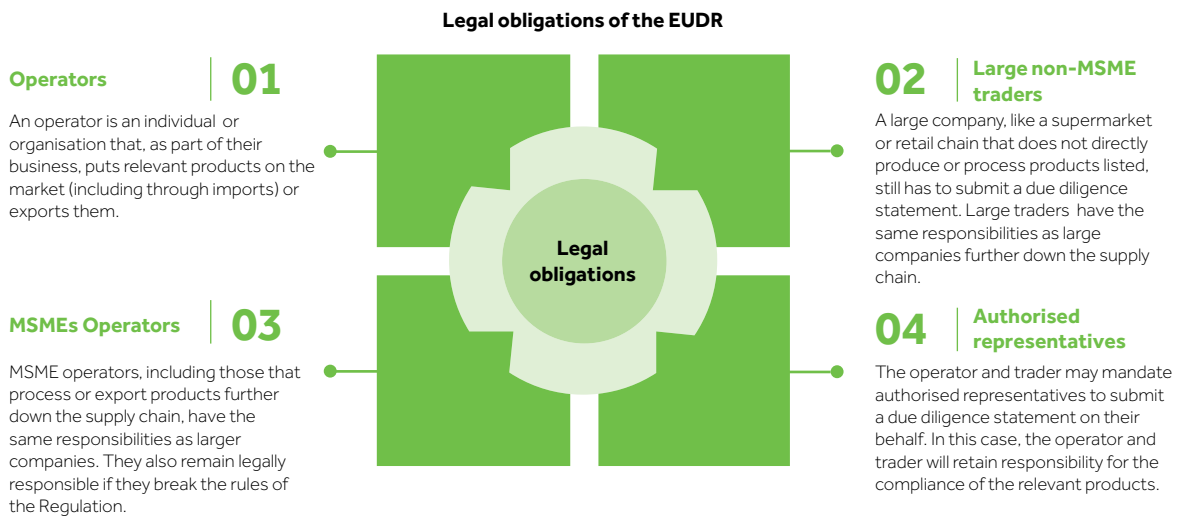
Per the EUDR, only products that are both deforestation- and degradation-free, as well as legally produced, can be placed on or exported to and from the EU market. This requirement applies to all operators and traders, including MSMEs. Products must comply with the laws of the country of production, which include regulations on human

Figure 2.3 Relevant commodities covered by the EUDR.



Source: European Commission (2024).

Figure 2.4 EUDR legal obligations.



Source: European Commission (2024).

and labour rights, as well as the obligation to obtain free, prior and informed consent from indigenous peoples.⁹

Companies are also required to gather geographic co-ordinates for the plots of land where commodities are produced and to conduct due diligence to ensure there is no or negligible risk of non-compliance.⁹ The due diligence requirement consists of three steps: information collection, risk assessment and risk mitigation (see Figure 2.5). Concerning information collection, companies must collect and retain for at least five years the

following information: a description of the product (including trade name and type), the quantity, the country and specific region of production, the geolocation and production dates of the land where it was sourced, contact details of suppliers and buyers, and verifiable evidence that the product is deforestation-free and produced in compliance with the laws of the production country, including land use rights.¹³

The risk assessment focuses on various important factors. These include the risk classification of the country of production (low, medium or high);

Figure 2.5 EUDR due diligence requirements.



Source: European Union webpage (2024).

whether forests and indigenous peoples are present; and if indigenous communities have been properly consulted. It also looks at claims made by indigenous groups about land ownership; the extent of deforestation in the region; and issues like corruption, poor law enforcement and human rights abuses. The complexity of the supply chain, the trustworthiness of suppliers and the risk of mixing non-compliant products are also assessed. Past non-compliance, third-party certifications and insights from expert groups can help in evaluating if products meet EUDR standards.¹³

If a risk assessment indicates a non-negligible risk of non-compliance, operators or traders must implement risk mitigation measures such as gathering additional documentation, conducting independent audits or assisting suppliers in meeting requirements. They are also required to establish appropriate policies, controls and procedures, which should include risk management practices, reporting and record-keeping systems, the appointment of a compliance officer at the management level and the use of an independent audit function to oversee and verify the effectiveness of these internal controls.¹³

These findings must be affirmed in due diligence statements submitted to competent authorities. The regulation sets a three-tier risk assessment system for countries – high, low and standard risk – and the due diligence requirements vary based on this classification. As of 29 June 2023, all countries have been assigned a standard risk level, but the European Commission is committed to publishing a list of countries or regions that pose either low or high risk. Furthermore, companies must assist competent authorities during enforcement checks by providing access to premises and making available all necessary documentation and records.⁹

Under the EUDR, companies that fail to comply face a range of penalties, including fines, product recovery and the collection of revenue from relevant products. Additional sanctions can include exclusion from contract award procedures, prohibitions on placing or exporting products in the EU market and loss of eligibility for simplified due diligence processes. Beyond these legal and financial consequences, companies also face reputational damage, as the European Commission will publicly disclose EUDR violations confirmed by courts. This includes publishing the name of the company and details of the infringement online.⁸

3. Trade Structure of EUDR Covered Commodities and Products in Sub-Saharan Africa

Africa is a major producer and exporter of the EUDR covered commodities and products. The covered commodities of cocoa, coffee, soy, wood and palm oil are vital to African economies, contributing up to 25 per cent of gross domestic product and 60 per cent of employment in some cases. All the covered commodities and their derivative products provide significant benefits in terms of supporting the livelihoods of many people and groups, including farmers, co-operatives and processors. The commodities also contribute significantly to the economies of the producing countries in terms of foreign exchange and earnings. This section contains an overview of the covered commodities and their trade and investment aspects between sub-Saharan African countries and the EU. It excludes cattle and cattle products as the EU is not a major destination for cattle products from Africa.

3.1 Cocoa sector

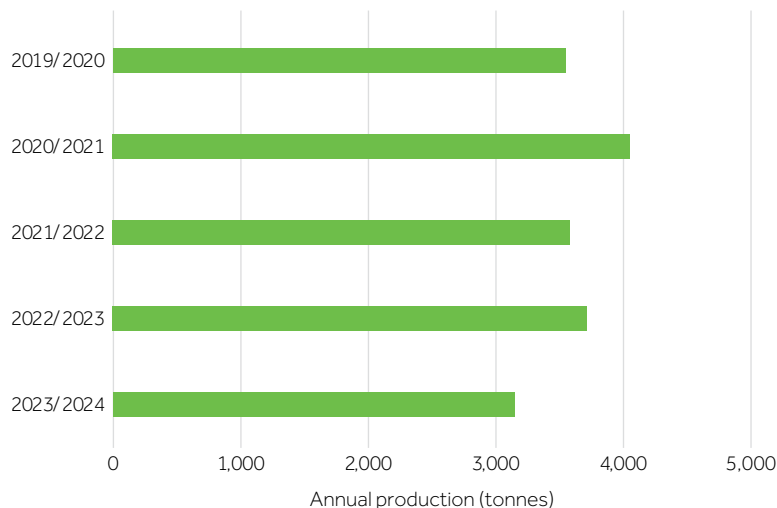
Cocoa is produced mainly in West Africa, which accounted for 73.4 per cent of global cocoa

production during the 2022/23 season; Ivory Coast, the world's largest cocoa producer, contributed approximately 44 per cent while Ghana contributed about 14 per cent of the global total.¹⁴ Other countries in the region that contribute to cocoa production include Cameroon, Nigeria and Liberia. The cocoa sector largely comprises smallholder farmers who depend on cocoa as their primary income source.¹⁵

Africa's annual cocoa bean production (see Figure 3.1) rose from 3.55 million tonnes in 2019/20 to 4.06 million tonnes in 2020/21. It then declined to 3.59 million tonnes in 2021/22 and increased slightly to 3.72 million tonnes in 2022/23. Production is further estimated to decline to 3.15 million tonnes in 2023/24.

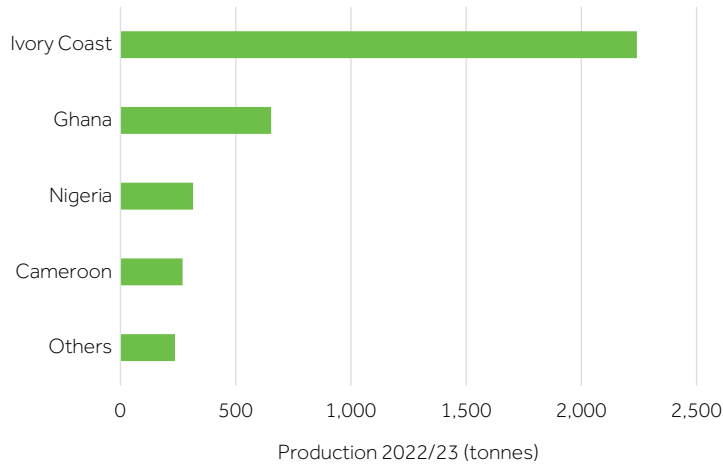
The area harvested for cocoa beans in Africa grew from 7.86 million ha in 2018 to 8.54 million ha in 2022. Africa's cocoa yield increased slightly from 4,816 kg per ha in 2018 to 4,833 kg per ha in 2021. In 2022, the yield decreased to 4,803 kg per ha.¹⁶ Despite its importance, cocoa production is linked

Figure 3.1 Africa's annual cocoa bean production.



Source: International Cocoa Organization (2024).

Figure 3.2 Africa’s major producers of cocoa beans in the 2022/23 season.



Source: International Cocoa Organization (2024).

to 360,000 ha (37.4 per cent) of deforestation in protected areas of Ivory Coast and 26,000 ha (13.5 per cent) in Ghana since 2000.¹⁷ This is driven by poverty among cocoa farmers, low cocoa prices, weak governance, lax law enforcement and lack of co-ordination among state institutions tasked with addressing the problem of deforestation.¹⁸

In Africa, Ivory Coast leads cocoa bean production, generating 2.24 million tonnes in the 2022/23 season, or 60.3 per cent of the continent’s total cocoa bean output. Ghana is the next largest producer, with 654,000 tonnes, or 17.6 per cent. Cameroon follows with 270,000 tonnes, or 7.3 per cent. Nigeria produces 315,000 tonnes, making up 8.5 per cent of the total. Other countries collectively contributed 237,000 tonnes, which is 6.4 per cent of Africa’s annual cocoa bean production (see Figure 3.2).

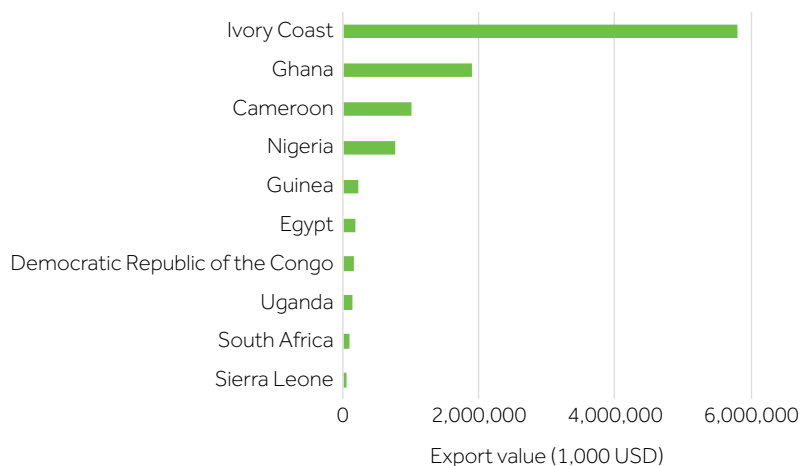
Exports

Approximately 75 per cent of Africa’s cocoa production is exported in its raw form (cocoa beans); the remaining 25 per cent is processed within the region for local consumption¹⁹ and for export.²⁰ This results in a significant portion of the raw cocoa being processed and reintroduced to the region as products such as chocolate bars, cocoa drinks and cocoa powder.¹⁹

In 2019, Africa’s exports of cocoa and cocoa preparations totalled US\$9.22 billion. This fell to \$6.73 billion in 2020. It increased substantially the following year to \$10.39 billion, which was followed by a drop to \$9.27 billion in 2022. However, exports rebounded to \$10.52 billion in 2023.¹⁵

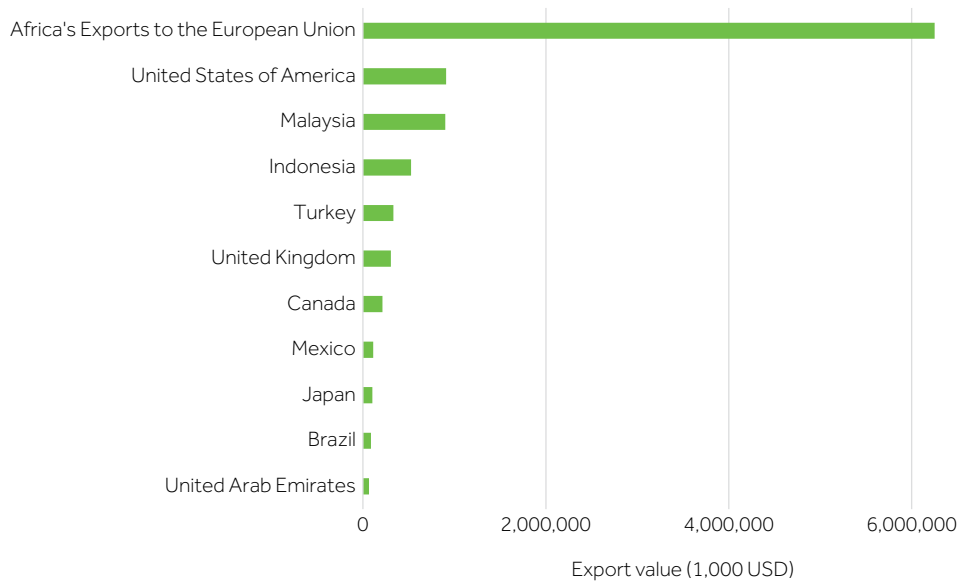
In 2023, Figure 3.3 shows, Ivory Coast led Africa’s cocoa exports with US\$5.81 billion (55.2 per cent),

Figure 3.3 Top 10 exporters of cocoa and cocoa preparations from Africa in 2023.



Source: ITC Trade Map (2024).

Figure 3.4 Top 10 export destinations for Africa's cocoa and cocoa preparations in 2023 (% share).



Source: ITC Trade Map (2024).

followed by Ghana at \$1.90 billion (18.1 per cent) and Cameroon at \$994.2 million (9.5 per cent). Nigeria contributed \$759 million (7.2 per cent), with smaller shares from Guinea at \$211.7 million (2.0 per cent), Egypt at \$183.2 million (1.7 per cent), Democratic Republic of Congo (DRC) at \$148.7 million (1.4 per cent), Uganda at \$141.4 million (1.3 per cent), South Africa at \$96.8 million (0.9 per cent) and Sierra Leone at \$52.2 million (0.5 per cent).

The EU was the main market for Africa's cocoa and cocoa preparations, accounting for 59.4 per cent of the continent's total exports (see Figure 3.4). The Netherlands emerged as the top destination, receiving 29.2 per cent. Germany accounted for 7.4 per cent and France 6.4 per cent, while Belgium received 6 per cent. Other destinations included Malaysia and the US, each accounting for 8.6 per cent, and Indonesia, which accounted for 5 per cent of the exports from Africa.

3.2 Palm oil sector

Africa contributes less than 5 per cent to the global production of over 55 million tonnes of crude palm oil annually, which supports worldwide supply chains. The continent currently accounts for 10 per cent of global palm oil consumption but its production falls short of meeting its current needs.²¹ In Ghana, over 20,000 smallholder farmers cultivate palm oil, while Ivory Coast has around 44,900 palm oil growers.²² In Nigeria, palm oil production supports employment for at least 1.8 million people.²³

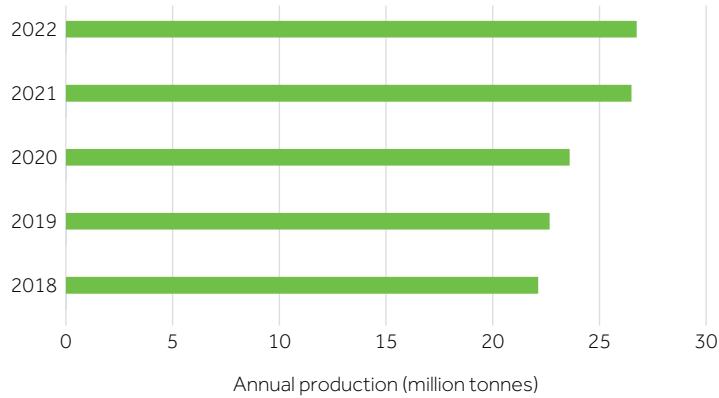
The area harvested for palm oil production in Africa increased from 5.5 million ha in 2018 to 6.8 million ha in 2022. Palm oil yields declined from 40,266 g/ha in 2018 to 39,195 g/ha in 2022. Between 2018 and 2022, palm oil production in Africa rose steadily from 22.1 million tonnes to 26.7 million tonnes. The most significant increase occurred between 2020 and 2021, with production going from 23.6 million tonnes to 26.5 million tonnes. This upward trend continued into 2022, reaching 26.7 million tonnes (see Figure 3.5).¹⁶

In Africa, as Figure 3.6 shows, Nigeria is the leading palm oil producer, with 12.6 million tonnes in 2022. It is followed by Cameroon (2.8 million tonnes), Ivory Coast (2.8 million tonnes), Ghana (2.5 million tonnes) and DRC (2.3 million tonnes).

Exports

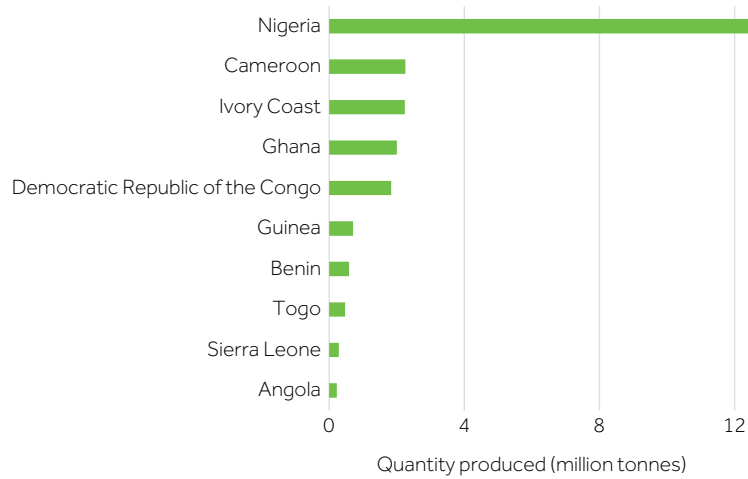
As Figure 3.7 shows, Africa's palm oil exports amounted to US\$631.68 million in 2019 and increased to \$1.94 billion in 2022, before declining to \$1.34 billion in 2023. In 2023, Djibouti led Africa's palm oil exports with \$539.3 million (40.1 per cent), followed by Ivory Coast with \$297.2 million (22.1 per cent). Kenya exported \$108.0 million (8 per cent), while Gabon contributed \$96.9 million (7.2 per cent). Uganda, Togo and Ghana exported \$79.4 million (5.9 per cent), \$69.2 million (5.1 per cent) and \$53.9 million (4.0 per cent), respectively. Liberia and South Africa each exported \$26.8 million (2 per cent), and Sierra Leone exported \$12.1 million (0.9 per cent).

Figure 3.5 Africa's annual palm oil production.



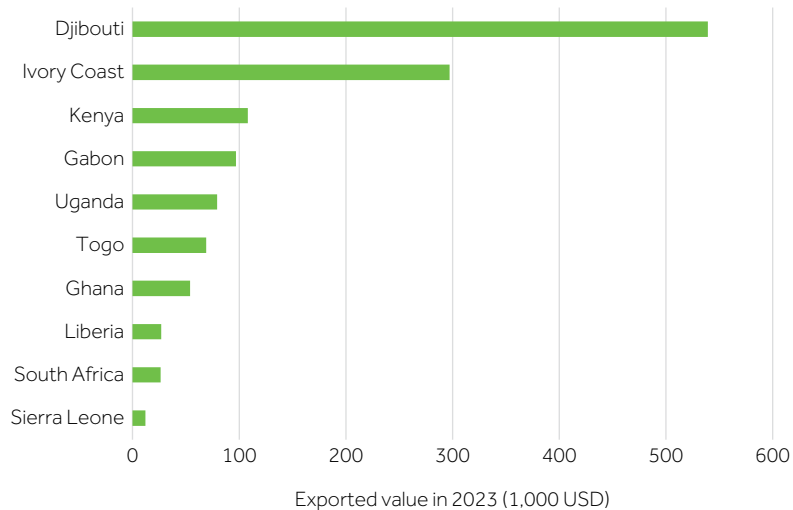
Source: FAOSTAT (2024).

Figure 3.6 Africa's major palm oil production (tonnes) by country in 2022.



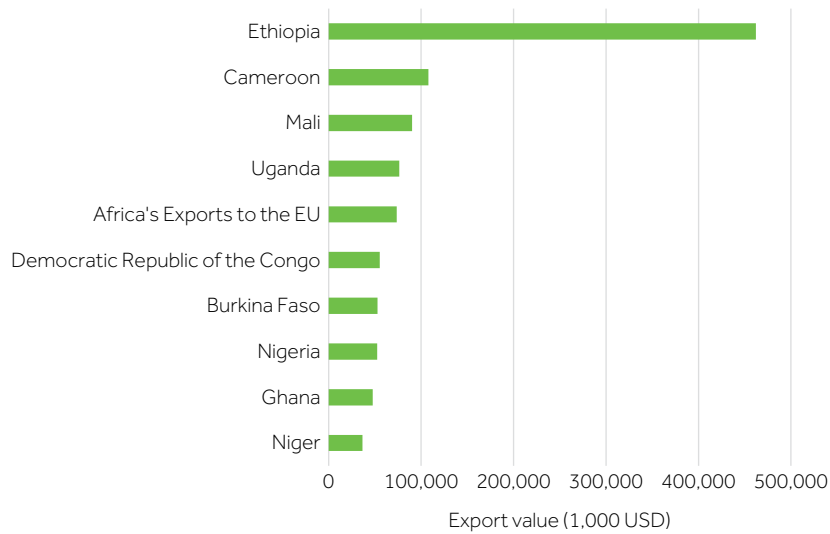
Source: FAOSTAT (2024).

Figure 3.7 Top 10 exporters of palm oil from Africa in 2023.



Source: ITC Trade Map (2024).

Figure 3.8 Top 10 export destinations for Africa's palm oil in 2023 (% share).



Source: ITC Trade Map (2024).

In 2023, Africa exported over 80 per cent of its palm oil to other African countries. Ethiopia was the top export destination with a value of US\$462.1 million (34.4 per cent). It was followed by Cameroon at \$108.0 million (8 per cent) and Mali at \$90.3 million (6.7 per cent). Uganda accounted for \$76.4 million (5.7 per cent) and the EU for \$73.7 million (5.5 per cent). DRC exported \$55.2 million (4.1 per cent), while Burkina Faso, Nigeria, Ghana and Niger accounted for \$52.7 million (3.9 per cent), \$52.6 million (3.9 per cent), \$47.5 million (3.5 per cent) and \$36.7 million (2.7 per cent), respectively (see Figure 3.8).

3.3 Rubber sector

The rubber industry plays a key role in Africa's agricultural and industrial sectors by supplying essential materials for many uses. Rubber production is concentrated mainly in West and Central Africa, with Ivory Coast, Nigeria and Cameroon among the top producers. In Ivory Coast and Nigeria, the rubber industry plays an important role in boosting agricultural gross domestic product and providing employment for thousands of people. Rubber exports are a key source of foreign exchange, with Ivory Coast alone earning around US\$500 million from rubber exports in 2022.²⁴

The area harvested for rubber in Africa increased from 1,035,935 ha in 2018 to 1,547,999 ha in 2022. The yield of rubber increased from 9,574 g/ha in 2018 to 11,369 g/ha in 2022. In terms of production in 2018, rubber production was approximately 991,800 tonnes but this increased to 1.17 million tonnes in

2019 and continued to grow in 2020, reaching 1.34 million tonnes. By 2021, production had risen further, to 1.54 million tonnes. In 2022, the highest value was recorded, at 1.76 million tonnes (see Figure 3.9).

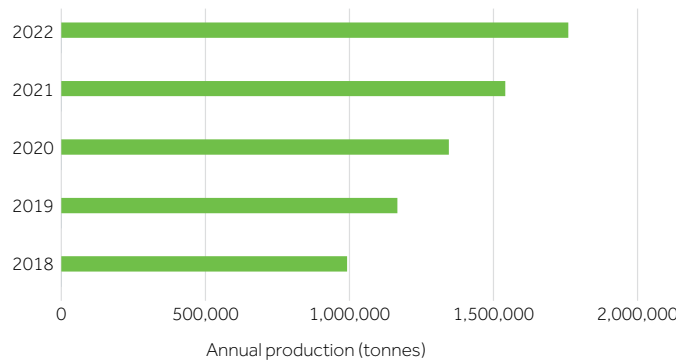
Ivory Coast is the largest producer, contributing 1.29 million tonnes in 2022, as illustrated in Figure 3.10. This accounted for 73 per cent of Africa's total rubber production.²⁵ Nigeria follows, with 149,397 tonnes, while Ghana produces 117,000 tonnes. Liberia's production stands at 107,100 tonnes, and Cameroon produces 50,500 tonnes. Other producers include Gabon, Guinea, DRC, Congo and Central Africa Republic (see Figure 3.10).

Exports

Africa's annual rubber exports have shown steady and significant growth, starting at US\$1.2 billion in 2019 and reaching \$2.45 billion in 2023. In 2023, Ivory Coast was Africa's leading rubber exporter with a share of 83.6 per cent and a value of \$2.05 billion (see Figure 3.11). Ghana followed with \$111.4 million (4.5 per cent), while Liberia exported \$97 million (4 per cent). Cameroon, Nigeria and Guinea exported \$59.4 million (2.4 per cent), \$54.3 million (2.2 per cent) and \$41.1 million (1.7 per cent), respectively. Gabon, DRC, Egypt and Malawi exported \$20.2 million (0.8 per cent), \$6.1 million (0.2 per cent), \$4.7 million (0.2 per cent) and \$4.1 million (0.2 per cent) respectively (see Figure 3.11).

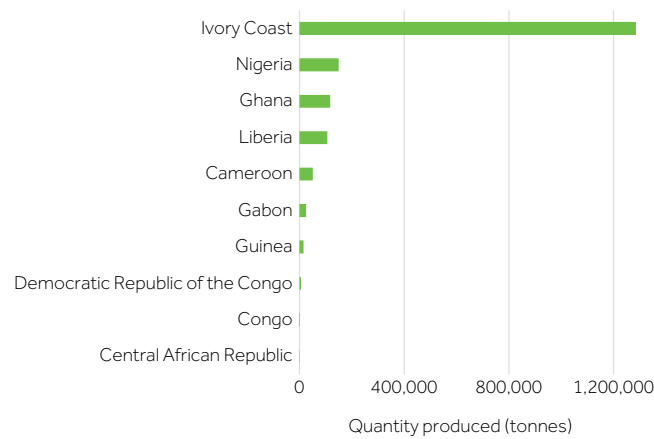
In terms of exports, in 2023 Africa's rubber was directed primarily to Asia and North America.

Figure 3.9 Africa's annual rubber production.



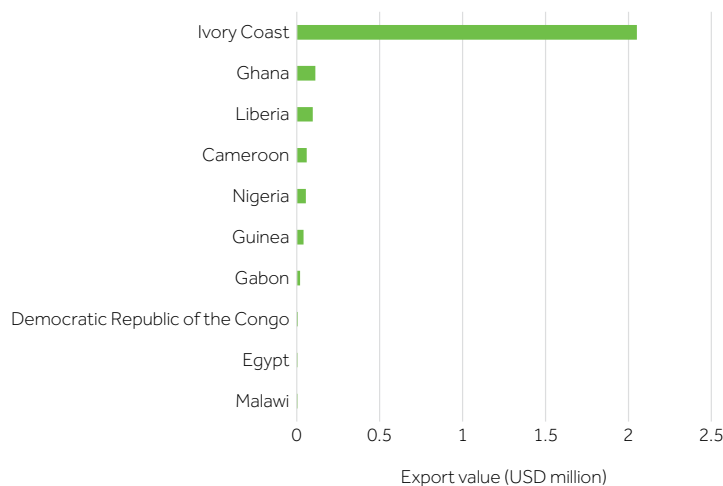
Source: FAOSTAT (2024).

Figure 3.10 Africa's major rubber producing countries in 2022.



Source: FAOSTAT (2024).

Figure 3.11 Top 10 exporters of rubber from Africa in 2023.



Source: ITC Trade Map (2024).

China and Malaysia were the leading destinations, capturing nearly half of Africa's total rubber exports, with 24.8 per cent and 22.7 per cent shares, respectively. The EU accounted for 22.5 per cent, the US followed with 8.6 per cent and India

received 4.7 per cent (see Figure 3.12). The leading European countries included Spain, Belgium, Germany and Poland, each accounting for less than 4 per cent of Africa's rubber exports.

3.4 Soy sector

Africa’s soybean production has been increasing steadily. The total area dedicated to soybean cultivation in Africa went from 2.74 million ha in 2018 to 3.86 million ha by 2022. Soybean yield increased from 13,910 g/ha in 2018 to 11,761 g/ha in 2022. As Figure 3.13 shows, in 2018, production stood at 3.81 million tonnes, decreased slightly in 2019 to 3.61 million tonnes and then rose again to 4.5 million tonnes in 2020. In 2021, production peaked at 5.52 million tonnes, before dropping again to 4.54 million tonnes in 2022.

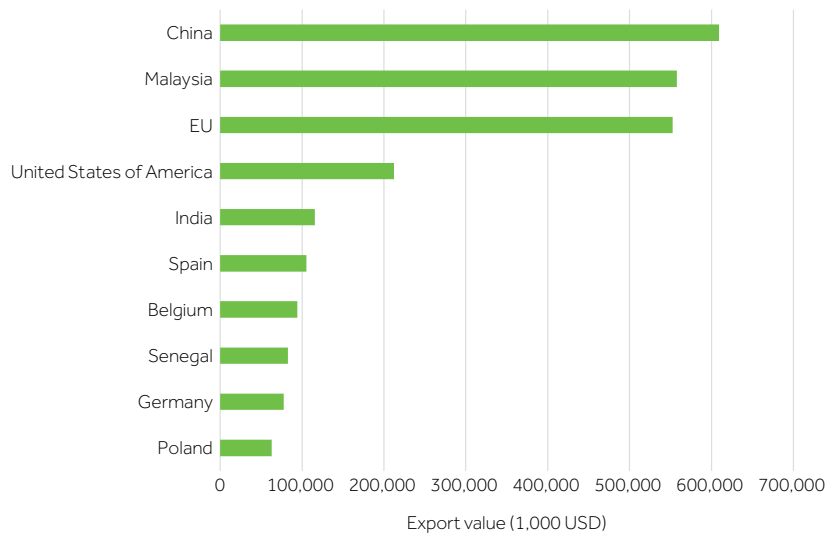
South Africa was the leading producer of soybeans in Africa in 2022, with an output of 1.15 million tonnes, representing 25.3 per cent of the continent’s total production (see Figure 3.14). Nigeria followed closely with 1.1 million tonnes, accounting for 23.4 per cent. Zambia produced

475,353 tonnes, or 10.5 per cent. Benin and Togo contributed 306,198 tonnes and 236,450 tonnes, respectively, or 6.8 per cent and 5.2 per cent of the total output.

Exports

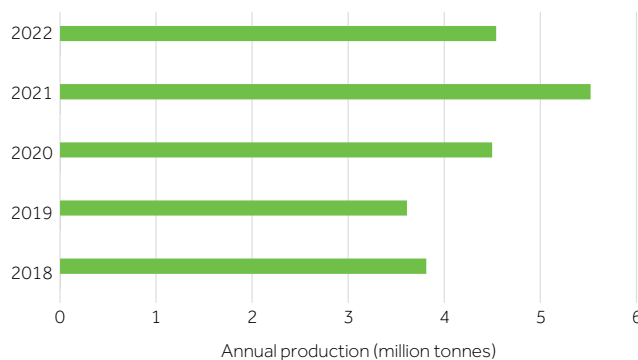
Africa’s annual soybean exports increased from US\$138.3 million in 2019 to \$1.2 billion in 2023. In 2023, as Figure 3.15 shows, South Africa led Africa’s soybean exports at \$389 million (33.2 per cent), followed by Nigeria with \$250 million (21.3 per cent) and Ethiopia with \$130 million (11.1 per cent). Benin exported \$91 million (7.8 per cent), Togo \$59 million (5.1 per cent), Tanzania \$53 million (4.5 per cent), Mozambique \$48 million (4.1 per cent), Zambia \$42 million (3.5 per cent), Malawi \$40 million (3.4 per cent) and Ghana \$33 million (2.8 per cent).

Figure 3.12 Top 10 export destinations for Africa’s rubber exports in 2023 (% share).



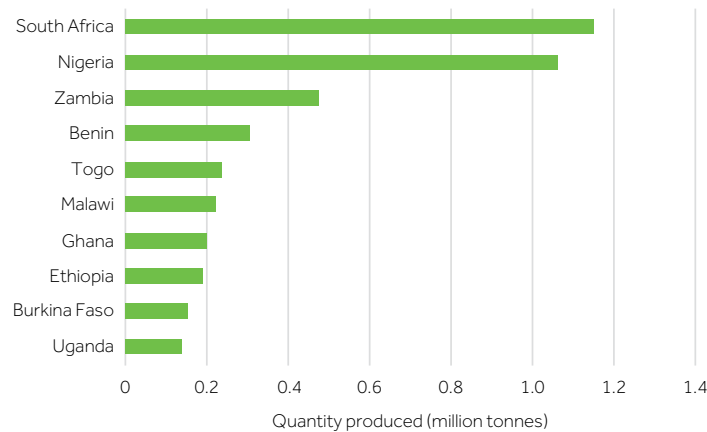
Source: ITC Trade Map (2024).

Figure 3.13 Africa’s annual soybean production, 2018–2022.



Source: FAOSTAT (2024).

Figure 3.14 Africa’s major soybean producing countries in 2022.



Source: FAOSTAT (2024).

India was the largest destination for Africa’s soybeans in 2023, accounting for 23.8 per cent of exports valued at US\$278.96 million. Significant markets also included Pakistan and Bangladesh, with shares of 15.5 per cent and 11.4 per cent, respectively. The EU accounted for 5.2 per cent of Africa’s soybean exports, with France alone taking up 2.5 per cent. Mozambique accounted for 4.7 per cent, Vietnam 4.4 per cent and Tanzania 3.9 per cent. Thailand and the US each accounted for 2.9 per cent (see Figure 3.16).

3.5 Wood sector

Africa produced approximately 30.3 million m³ of sawn wood in 2020, with Republic of Congo, Cameroon and Gabon the leading producers.²⁶

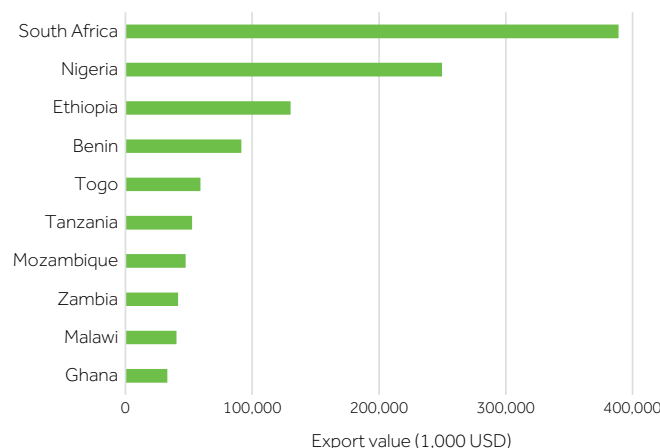
Africa consumes about 700 million m³ of wood annually, with 625 million m³ used for fuel and

75 million m³ for industrial products. While Africa’s demand for industrial wood is relatively small, making up only 5 per cent of global demand, the combined consumption of both fuel and industrial wood makes Africa the largest wood consumer globally. Africa accounts for over one-fifth of the total global wood demand of 3.5 billion m³.²⁷

Exports

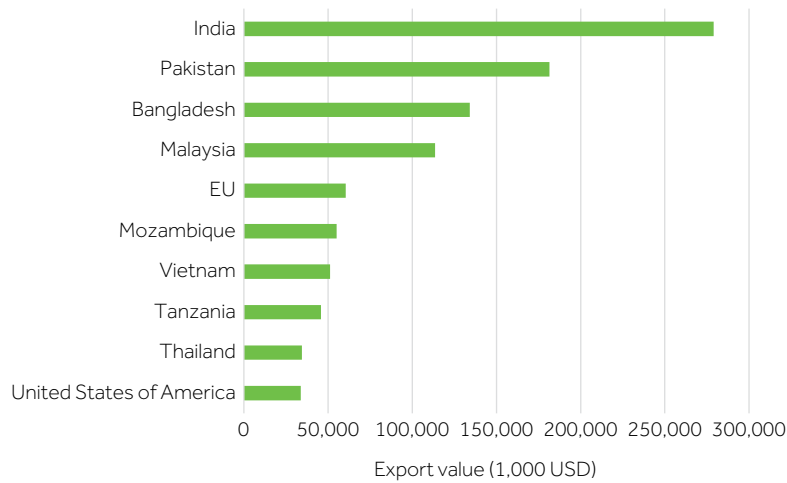
Africa’s exports of wood and related products were US\$3.19 billion in 2019, decreased to \$2.82 billion in 2020, peaked at \$4.27 billion in 2022 and then declined again to \$3.51 billion in 2023. In 2023, Africa’s top wood exporters, as shown in Figure 3.17, were led by Gabon with \$837.9 million (23.9 per cent), followed by Cameroon with \$719.4 million (20.5 per cent), South Africa with \$534.8 million (15.2 per cent) and Republic of Congo with \$382 million (10.9 per cent). Eswatini contributed \$135.5 million

Figure 3.15 Top 10 exporters of soybean from Africa in 2023.



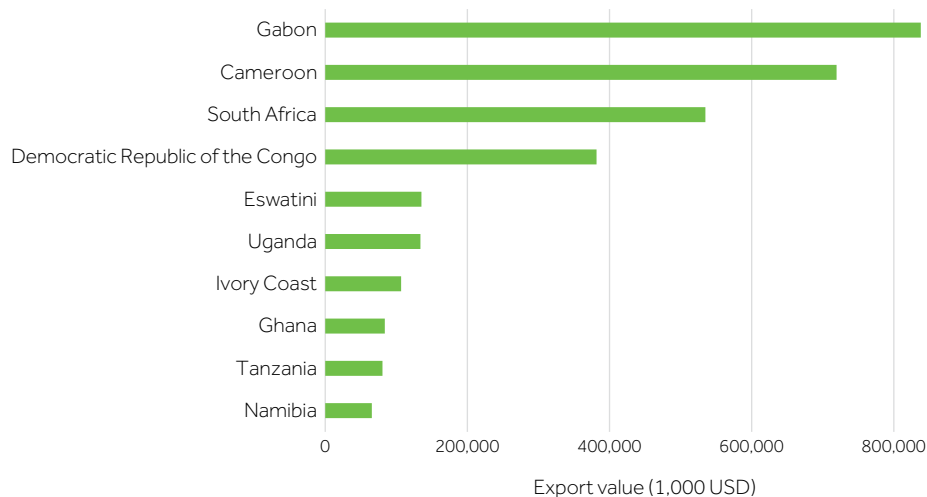
Source: ITC Trade Map (2024).

Figure 3.16 Top 10 export destinations for Africa's soybean exports in 2023 (% share).



Source: ITC Trade Map (2024).

Figure 3.17 Top 10 exporters of wood and wood charcoal from Africa in 2023 (% share).



Source: ITC Trade Map (2024).

(3.9 per cent), Uganda \$133.9 million (3.8 per cent), Ivory Coast \$106.9 million (3.0 per cent), Ghana \$84 million (2.4 per cent), Tanzania \$80.5 million (2.3 per cent) and Namibia \$65.3 million (1.9 per cent).

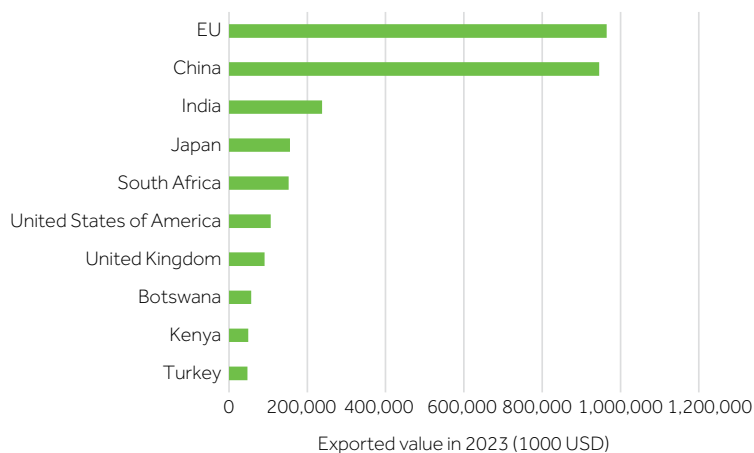
Africa's top wood and charcoal export destinations in 2023 were the EU, which accounted for US\$964.6 million (27.5 per cent) of the continent's total exports. It was followed by China at \$945.6 million (26.9 per cent) and India at \$237.5 million (6.8 per cent). Japan and South Africa received \$155.5 million (4.4 per cent) and \$152.1 million (4.3 per cent), respectively. The US accounted for \$106.5 million (3.0 per cent), while the UK, Botswana, Kenya and Türkiye received \$90.6 million (2.6 per cent), \$56.4 million (1.6 per cent), \$49.5 million (1.4 per

cent) and \$47.3 million (1.3 per cent), respectively (see Figure 3.18).

3.6 Coffee sector

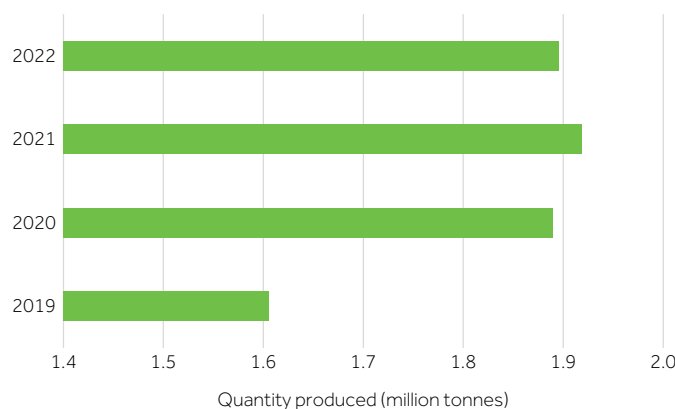
According to the International Coffee Organization, Africa's annual coffee production increased from 18.5 million (60 kg) bags in 2019/20 to 19.3 million by 2021/22 (see Figure 3.19). Production dropped to 17.9 million bags in 2022/23 but increased to 20.1 million bags in 2023/24, which accounted for 12.1 per cent of global coffee production.²⁸ The land area harvested for green coffee production in Africa increased from 4.1 million ha in 2019 to 4.7 million ha in 2021, before decreasing to 4.3 million ha in 2022.¹⁶ Annual yield increased from 3,901 g/ha

Figure 3.18 Top 10 export destinations for Africa’s wood and wood charcoal in 2023 (% share).



Source: ITC Trade Map (2024).

Figure 3.19 Africa’s annual coffee production, 2019–2024.



Source: International Coffee Organization (2024).

in 2019 to 4,407 g/ha in 2022. Africa’s coffee consumption in 2023 stood at 12.5 million bags, which is approximately 7 per cent of global coffee consumption.²⁸

Ethiopia is the leading coffee producer in Africa, producing 496,200 tonnes in 2022, which represented 26.2 per cent of the continent’s total output. Uganda followed with 393,900 tonnes (20.8 per cent), with the Central African Republic producing 306,901 tonnes (16.2 per cent) and Guinea 261,645 tonnes (13.8 per cent). Other countries, like Ivory Coast, Tanzania, DRC, Kenya and Madagascar, produced smaller amounts (see Figure 3.20).

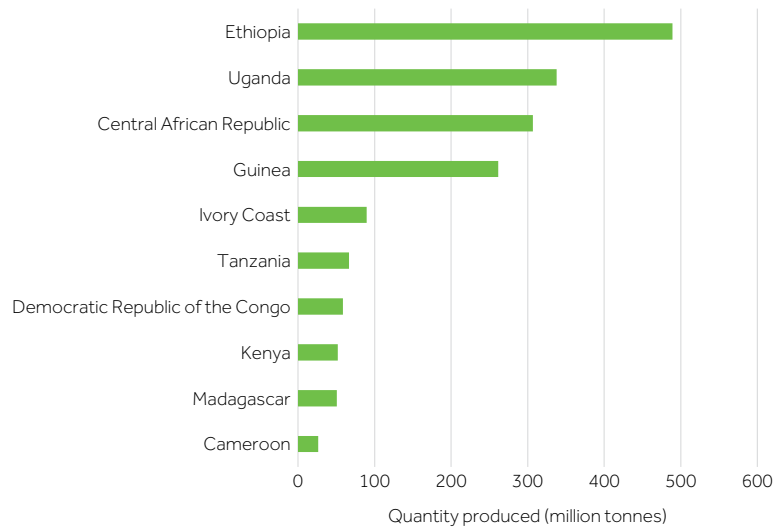
Exports

Africa’s coffee exports rose from about US\$1.96 billion in 2019 to approximately \$3.63 billion in 2022, followed by a decrease to around \$3.03 billion in

2023. As Figure 3.21 shows, Ethiopia led Africa’s coffee exports with a significant value of \$1.22 billion in 2023, accounting for approximately 40.5 per cent of the continent’s total exports. Uganda followed with \$955.1 million (31.6 per cent), and Kenya contributed \$261.0 million (8.6 per cent). Tanzania accounted for \$232.5 million (7.7 per cent), while Rwanda exported \$93.6 million (3.1 per cent). Together, these five countries provide over 95% of Africa’s coffee exports. Other exporters included Ivory Coast with \$62.1 million (2.1 per cent), Burundi with \$53.6 million (1.8 per cent), Cameroon with \$31.0 million (1.0 per cent), Zambia with \$23.3 million (0.8 per cent) and South Africa with \$21.5 million (0.7 per cent).

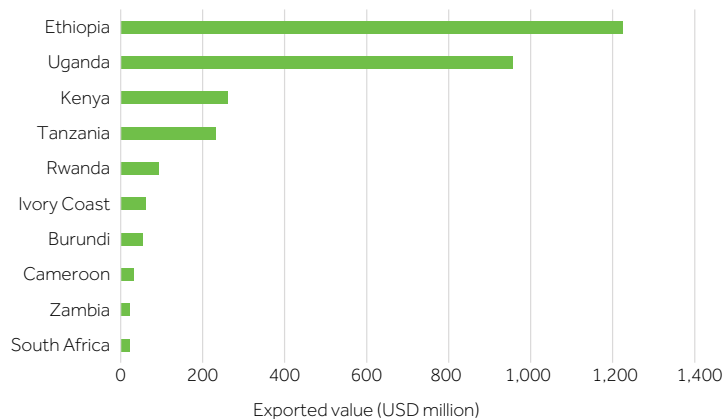
The EU was the leading destination for African coffee exports in 2023 with a share of 41.7 per cent (see Figure 3.22). Within the EU, Germany (\$367 million) and Italy (\$331 million) accounted for 23 per cent of total coffee imports from the

Figure 3.20 Africa's major coffee producing countries in 2022.



Source: FAOSTAT (2024).

Figure 3.21 Top 10 exporters of coffee from Africa in 2023.



Source: ITC Trade Map (2024).

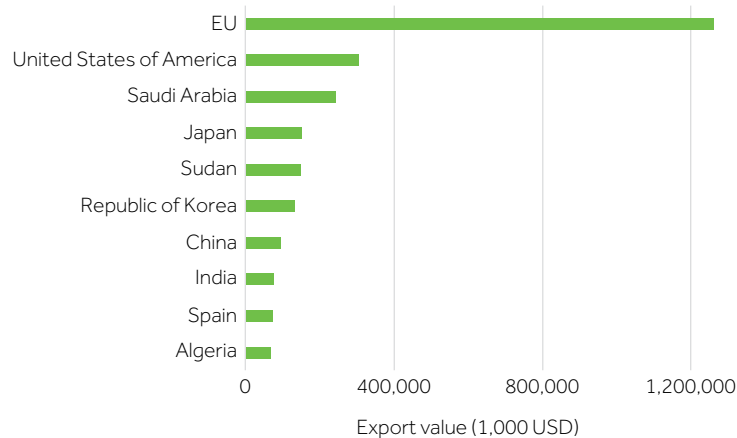
continent. The US followed with \$306.6 million (10.1 per cent), and Saudi Arabia was at \$243.9 million (8.1 per cent). Japan imported \$151.5 million (5 per cent), while Sudan accounted for \$149.0 million (4.9 per cent). The Republic of Korea accounted for \$132.7 million (4.4 per cent), China \$95.5 million (3.2 per cent), India \$75.8 million (2.5 per cent), Algeria \$68.5 million (2.3 per cent) and United Arab Emirates \$55.9 million (1.8 per cent).

3.7 Trade value of affected commodities and their derivatives

On average, from 2021 to 2023, the total value of Africa's exports of the affected commodities

and their derived products to the world was about US\$40.2 billion. Of this, 27.4 per cent (approximately \$11 billion) is exported to the EU (see Table 3.1). This makes the EU a critical market for Africa, especially for products like cocoa, coffee and rubber, and their derivatives, which are highly exported to the EU. If African exporters are unable to meet the EUDR's stringent sustainability standards, they risk losing up to \$11 billion in annual revenue on the relevant commodities and their derivatives.

Cocoa and its derivatives are Africa's most vulnerable export under the EUDR, as 59 per cent is exported to the EU. This means that failing to meet the new standards could cost Africa up to US\$5.93 billion in lost cocoa revenue alone. The continent also risks losing \$1.33 billion, \$883 million,

Figure 3.22 Top 10 export destinations for Africa's coffee exports in 2023 (% share).

Source: ITC Trade Map (2024).

Table 3.1 Trade value of Africa's exports of relevant commodities and their derivatives to world and EU, average 2021–2023.

Commodity	Value of Africa's exports of affected commodities and their derivatives to world (\$ '000s)	Value of Africa's exports of affected commodities and their derivatives to world (\$ '000s)	EU share (%)
Cattle	8,920,941	137,077	1.5
Cocoa	10,058,017	5,932,780	59.0
Coffee	3,076,962	1,331,458	43.3
Palm oil	1,932,097	182,905	9.5
Rubber	3,131,861	882,663	28.2
Soya	4,812,220	951,544	19.8
Wood	8,224,761	1,567,163	19.1
Total	40,156,858	10,985,591	27.4

Source: Author's computation based on data from ITC Trade Map (2024).

\$952 million and \$1.57 billion in coffee, rubber, soya and wood exports to the EU if compliance is not met. Commodities such as cattle and palm oil are less reliant on the EU market, with only 1.5 per cent and 9.5 per cent of their exports going to the EU, respectively. This could result in potential losses of \$137 million and \$183 million if they fail to fulfil new regulatory standards.

The EUR and relevant environmental regulations pose significant risks to African producers, who may lose access to the European market if they are unable to meet the necessary requirements.

Complying with the EUDR would involve costs associated with certification, monitoring and tracking the supply chain to prove deforestation-free sourcing. Smallholder farmers, who often lack the resources for compliance, would be particularly vulnerable, as they may be ignored by exporters. Exporting companies may also see profits decline, or they may even go out of business without EU market access. As export revenues decline, poverty rates in affected communities could rise because many families, especially those in rural areas, depend on the income generated from export-related activities of the affected commodities.

4. Africa's Regulatory Frameworks on Land Use, Deforestation and Land Degradation

The EUDR establishes a mandatory due diligence system for operators and large traders trading in the EU to ensure their products are deforestation-free and comply with relevant local legislation of the country of production. It also introduces a country benchmarking system to assess the risk of non-compliance in producer countries.²⁹ The EUDR requires operators (who are EU importers) to collect conclusive and verifiable information proving that commodities are produced in line with the laws of the country of origin. These laws, referred to as 'relevant legislation of the country of production', cover various aspects, including land use rights, environmental protection, forest management and biodiversity conservation, particularly in relation to wood harvesting. They also address third-party, labour and human rights under international law, and the principle of free, prior and informed consent. Also, regulations related to tax, anti-corruption, trade and customs are part of the required compliance.³⁰

Many African countries have legislation and regulatory frameworks on land use, forest management, environmental protection and biodiversity conservation. On land use, almost all African countries have the legal framework for land ownership and use. The laws cover the use of state, private and customary land. They also cover the use of land for agricultural purposes, settlement, reservation and conservation. For example, Ghana's land use regulation prohibits farming in restricted forests. Additionally, environmental protection laws require the protection of the environment. However, within the agriculture and forestry space, the law applies mainly to large plantations. These plantations are to undertake environmental and social impact assessments of their activities. In Liberia, the Forestry Reform Law of 2006 addresses land ownership and use of forest resources and also deforestation originating from shifting cultivation or agricultural concessionaires in the country.³¹

On the legal framework for the environment, over 40 countries in Africa have environmental protection laws³² and another 35 have right to a healthy environment provisions in their national constitutions. Africa has over 90 per cent of forest designated as state-owned.³³ However, there is growing community ownership of forests, creating tensions related to the use and rights of forests. In terms of laws on forest management, there are frameworks on appropriate use and management of forest resources.

Besides the national frameworks, there are regional laws and policies covering land use, environmental protection and biodiversity. In the Economic Community for West African States (ECOWAS), the Forest Convergence Plan aims to mobilise political, institutional, technical and financial support to address transboundary forest issues and ensure national action plans address these issues across the 15 member states. Countries in the Southern African Development Community (SADC) region have ratified its Protocol on Forestry, which aims to promote the development, conservation, sustainable management and utilisation of all types of forests and trees; to promote trade in forest products to reap economic benefits from forests and alleviate poverty; and to achieve effective protection and safeguard the environment.³⁴ Countries in Central Africa, through the Economic Community of Central African States (ECCAS), have established the Commission of the Forests of Central Africa (COMIFAC) Convergence Plan to co-ordinate all interventions in the field of conservation and sustainable management of forest ecosystems in Central Africa.³⁵

In addition, African countries are signatories to international conventions and agreements that relate to the environment: 52 African countries are signatories to the Convention on

International Trade in Endangered Species of Wild Fauna and Flora (CITES); about 40 out of 55 African countries have submitted their Nationally Determined Contributions to the UNFCCC; and 14 are signatories to the International Timber Trading Organization (ITTO)³⁶ – an intergovernmental organisation promoting the sustainable management and conservation of tropical forests and the expansion and diversification of international trade in tropical timber from sustainably managed and legally harvested forests.

Despite the proliferation of national, regional, continental and global frameworks to which African countries are signatories, the level of degradation and deforestation on the continent is alarming. Between 2000 and 2018, about 49 million ha

(23 per cent) of land was deforested in Africa and three-quarters of this was converted to cropland.³⁷ Factors contributing to the degradation of land include the conversion of forest lands for settlements, mining and forest plantations.

The principal reasons for such high levels of deforestation and degradation in the face of multiple legal frameworks and institutions include outdated laws on land use, forest management and biodiversity and evolving tensions between state and politically controlled land use versus private and customary land use. Tension between forest protection and revenue generation from land use has been increasing.³⁸ At the same time, laws are not enforced, often because institutional and governance structures behind the laws are inadequate.

5. Trade and Investment Implications of the EUDR for Sub-Saharan African Countries

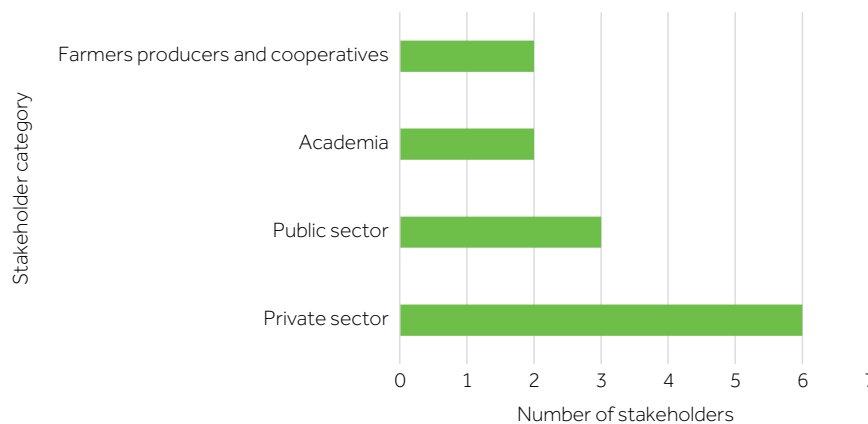
5.1 African stakeholder perspectives on existing environment and trade-related measures of the EU, UK and US

A survey was undertaken of 14 participants from Ivory Coast, Gabon, Ghana, Kenya, Liberia and Nigeria. The participants were randomly selected from the affected commodity sectors.* They came under four stakeholder categories: six were from the private sector, three from the public sector, two from academia and two from among farmers, producers and cooperatives (see Figure 5.1). All participants were male.

Out of the stakeholders interviewed, three (23 per cent) were in the cocoa sector and two (15 per cent) were in the palm oil and rubber sector; each of the following sectors had one stakeholder each (8 per cent): cocoa and coffee; cocoa and soybean; coffee; palm oil; palm oil, timber, cocoa and rubber; rubber; tea, coffee and cocoa; and timber (see Figure 5.2).

All participants were aware of deforestation and degradation in their country but were unable to estimate the exact levels of these activities. There was consensus among the participants that, while African countries have undertaken numerous initiatives to address deforestation and degradation in relation to the commodities covered under the EUDR, effective implementation remains a significant challenge. For instance, Nigeria's government is actively working with regulatory bodies that monitor compliance and require certifications such as the Roundtable on Sustainable Palm Oil (RSPO). Similarly, Ghana and Kenya have established Green Ghana Day and National Tree Growing Day, respectively, both dedicated to promoting tree planting. Another measure highlighted was that governments, through established regulatory bodies, monitor deforestation and enforce certification standards to reduce impacts both within affected commodity sectors and in broader areas. African governments have also committed to international frameworks

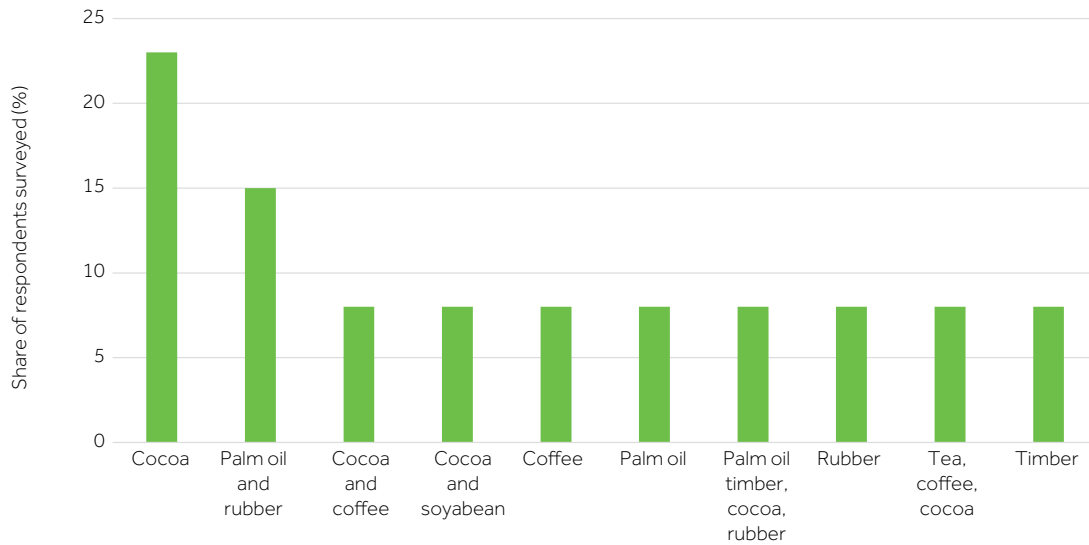
Figure 5.1 Surveyed stakeholders by category.



Source: Survey by author (2024).

* The survey results should be interpreted with caution given the very small sample size.

Figure 5.2 Commodity sectors represented by the survey respondents.

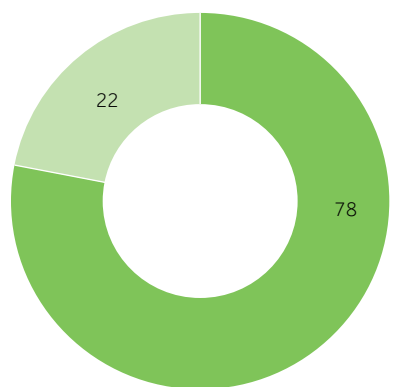


Source: Survey by author (2024).

such as the Reducing Emissions from Deforestation and Forest Degradation in Developing Countries plus additional forest-related activities (REDD+) mechanism and the New York Declaration on Forests to protect their forest resources.

In addition, 78 per cent of the respondents indicated that agriculture, driven by the expansion of land for farming, was a leading cause of deforestation. The remaining 22 per cent indicated that the factors leading to deforestation included infrastructure development, climate change, wood extraction and related activities, and mining (Figure 5.3). This suggests that the approach to address deforestation and land degradation has

Figure 5.3 Leading causes of deforestation (% share of survey respondents).



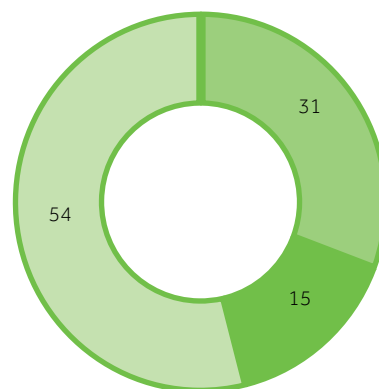
■ Agricultural productivity ■ Other factors

Source: Survey by author (2024).

to be multifaceted, targeting both agricultural practices and other contributing factors.

Some 33.3 per cent of respondents noted that deforestation was somewhat responsible for low agricultural productivity in their country. Another 55.2 per cent were unsure and an additional 11.1 per cent identified it as the main cause of agricultural productivity decline (Figure 5.4). This indicates that the link between deforestation and agriculture varies across African countries and also across specific commodity sectors.

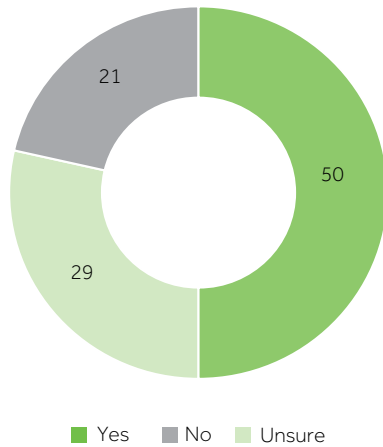
Figure 5.4 Contribution of land degradation and deforestation to agricultural productivity decline (% share of survey respondents).



■ Somewhat responsible ■ Responsible ■ Unsure

Source: Survey by author (2024).

Figure 5.5 Contribution of covered crops to deforestation (% share of survey respondents).



Source: Survey by author (2024).

Also, 50 per cent of the respondents indicated that cultivation of the covered products contributed to deforestation; 21 per cent said it did not while another 29 per cent expressed uncertainty (see Figure 5.5). Those who indicated that the covered crops did not contribute to deforestation noted that, in some African communities, for instance, there were areas within protected forest reserves where locals were allowed by law to farm, as in the case of community forests in Gabon and admitted farms in Ghana. Farming in these forests is expected to be conducted sustainably and is subject to various environmental conditions that are enshrined in national forest policies, and should therefore not be classified as contributing to deforestation. Moreover, certain commodities, such as cocoa grown in forested areas, undergo periodic rehabilitation. This process involves systematically removing diseased, dying and aged cocoa trees, which have significant impacts on production levels. Unfortunately, satellite imagery often misinterprets these rehabilitated farms, inaccurately identifying them as deforested areas. It is therefore important for the EU to understand these dynamics in order to gain an accurate perspective on deforestation linked to the production of the identified commodities in African countries.

Also, all the respondents indicated that their country had regulations regarding forest management, land use rights, labour, tax, human rights and environmental law. However, these policies have not been consolidated and they

are enforced by different national regulatory institutions. This could lead to challenges in enforcement, making it harder to ensure that all regulations are consistently adhered to. It is therefore imperative that African countries review all their environmental and land use regulations in order to identify existing gaps, consolidate them and put adequate measures in place to ensure effective implementation. The participants further noted that the covered commodities were cultivated in accordance with the relevant environmental legislation of their country and there were traceability systems in place to prove or trace if products were associated with deforestation.

In Ghana, the Ghana Cocoa Board (COCOBOD), as the regulatory authority, has implemented the Ghana Cocoa Traceability System. This is a national system to assist farmers, traders and operators in complying with EUDR requirements, rolled out in 2024. As part of the traceability system, farmers are assigned unique numbers that help in identifying them. COCOBOD is also working alongside various stakeholders to raise awareness among the key parties involved. It is also collaborating with the Forestry Commission of Ghana and the Food and Agriculture Organization of the UN (FAO) to develop the Deforestation Risk Assessment Model to create forest cover maps in Ghana and also to collect relevant data. COCOBOD, in collaboration with the International Cocoa Initiative and the German Agency for International Cooperation, has also undertaken a child labour risk assessment model in order to generate evidence for child labour and labour force data. This data will enable cocoa production in Ghana to comply with the EUDR. The data will be made available to operators and traders for a fee.

Although COCOBOD oversees Ghana's coffee sector, the industry has been liberalised, placing the responsibility on the private sector to implement the necessary systems to ensure compliance with the EUDR. However, because coffee is produced in cocoa-growing regions, COCOBOD plans to leverage the systems already established for the cocoa sector to assist coffee sector stakeholders in meeting EUDR requirements.

The Tree Crop Development Authority in Ghana is also implementing a traceability system, this time within the rubber sector in Ghana. The main challenge here lies with the aggregators who source rubber from various smallholder farmers for export. Unlike processing factories that buy directly from

farmers registered with the authority and that can implement traceability, these aggregators lack such systems, making it difficult to trace the origin of the rubber they procure.

The Forestry Commission of Ghana has also implemented the Ghana Electronic Wood Tracking System as a sub-component of Ghana's Timber Legality Assurance System to aid the country in meeting 'global standards' in timber legality assurance. It is designed for use by a range of stakeholders, including Forestry Commission staff, forest managers, mill owners and wood product exporters.³⁹ The Forestry Commission of Ghana also implements the Forest Law Enforcement, Governance and Trade (FLEGT) Voluntary Partnership Agreement with the EU.

In Ethiopia, both the government and the private sector are taking steps to meet the EUDR's requirements. The government has developed an action plan aimed at helping the coffee sector comply with the EUDR. This includes steps such as collecting geographic data (geodata) from coffee farms, raising awareness among smallholder farmers and covering some of the costs associated with making their operations legally compliant. The action plan has been submitted to the EU, along with a request for an extension to the EUDR implementation period to give Ethiopian farmers more time to comply with the new regulations. However, implementation of the action plan has been slow, and much remains to be done to build a national traceability system, which requires considerable time and financial resources.⁴⁰

Coffee growers in Ethiopia are also responding to the EUDR by adopting technologies like blockchain, geospatial artificial intelligence, global positioning system (GPS) and satellite imagery to ensure compliance. Coffee co-operatives such as Limu Inara are partnering with tech companies like Dimitra to implement blockchain platforms for tracking and sustainability. Meanwhile, the Oromia Coffee Farmers' Cooperative Union has piloted a GPS-based traceability system, though it faces challenges in scaling this up. Non-governmental organisations (NGOs) like Technoserve are also helping develop tools to support farmers in meeting the new EU requirements.⁴¹ Additionally, various business associations in Ethiopia are undertaking awareness-raising campaigns to inform their members about the EUDR and to provide guidance on necessary actions. However, these private

sector initiatives have not managed to reach all coffee producers.⁴⁰

The Netherlands Trust Fund and the International Trade Centre (ITC) have partnered with the Ethiopian Coffee and Tea Authority to develop a national action plan to support compliance with the EUDR. Moreover, ITC is assisting Ethiopian coffee producers in establishing sustainability plans, enhancing capacity and developing digital traceability systems. A trade mission organised by the TRAIDE Foundation has connected Dutch coffee traders with Ethiopian stakeholders, fostering business relationships and collaborative compliance efforts related to the EUDR.⁴⁰

Gabon has a robust framework for forest management, established by the Forest Code (Law 016/2001) enacted in 2001, which prioritised sustainability as a key objective. This law divides Gabonese forests into two main categories: the Permanent Forest Estate, comprising state-owned concessions and protected areas like national parks, and the Rural Forest Domain, which is accessible by local communities. In 2006, the code introduced mandatory guidelines for sustainable forest management.⁴² The code specifically establishes temporary development, exploitation and processing licences that lead gradually to the status of sustainable forest concessions. It requires all forest concession holders to prepare a forest management plan spanning 30 years, which divides and subdivides the concession into smaller annual harvesting lots. The law also requires these small annual plots have operational plans before logging will be authorised. This rotation system ensures trees are regenerated during the 25-year fallow period.⁴³

Gabon introduced its Vision 2025/2030 national timber policy in June 2020 and is revising the 2001 Forest Code, with a draft currently under public consultation. In 2021, the country launched the System for Certified Legal Traceability to certify the legality and traceability of timber. Additionally, all operators are expected to be Forest Stewardship Council (FSC) certified by 2025, though this was originally set for 2022. In 2019, Gabon became the first Congo Basin country to operationalise the Pan African Forest Certification (PAFC) scheme for sustainable forest management.⁴⁴

Gabon has also developed a traceability system for the wood industry known as the National Traceability System of Wood in Gabon (SNTBG).

The SNTBG is an open-source software system that was developed to enhance the transparency and traceability of natural resource management in Gabon's forest sector. It was designed in collaboration with Code4Nature and the Environmental Investigation Agency, and closely involved Gabon's Ministry of Water, Forests and the Environment. This represents a significant step towards improving governance and compliance within Gabon's forestry sector.

The development of the SNTBG was driven primarily by the need to transition from a paper-based system of permits to a digital one, addressing the widely recognised need for more efficient and transparent traceability systems in resource management. This move aims to address issues such as illegal logging, fraud, tax evasion and corruption. Implementation of the SNTBG began with a phased approach, officially launching in January 2023.

The SNTBG is an Android smartphone-based application that functions offline. The system provides differentiated user access based on permission levels, which include government administration, general government users, company management and public access for non-sensitive data. It includes eight modules covering various aspects, such as harvest authorisations, log transport permits, processing and export loading permits. The system is designed to allow for the real-time tracking and tracing of wood products from harvesting through to export, aiming for an easy, cheap and universal approach to digital supply chains.

All the respondents indicated that their country exported the covered products and their derivatives to the EU market. However, the EU is not their only export destination. Also, the share of commodities exported to the EU varies depending on the specific target market for each product. In some countries, the value of exports to the EU market is minimal overall. One survey respondent noted that, while some exporters may export their products to Europe, others may export their products to other markets such as Asia and the US.

Existing certifications for commodities

African countries rely on several international certification schemes to export relevant commodities to international markets, including the EU. Table 5.1 presents these certifications.

5.2 Awareness and perspectives on existing environment and trade-related measures of the EU, UK and US

In terms of their awareness of any emerging environment and trade-related measures of the EU, UK or US, 93 per cent of respondents were aware while 7 per cent were unaware (see Table 5.2). Those who were aware of the regulations included regulatory institutions; private sector players such as multinational organisations that receive regular updates and capacity-building support from their parent companies, both within and outside the continent; and exporters and businesses targeting the EU market. Exporters actively seek out information on market developments through independent research, despite the absence of formal support or capacity-building initiatives from governments or development partners. Also, the international standards and certifications they adhere to mandate that they comply with applicable global requirements. However, while exporters prioritising international markets take these steps, other local actors in the value chain, particularly smallholder farmers, make little to no effort to understand new market requirements.

More than half of the participants (67 per cent) indicated that the environment and trade-related measures of the EU, UK and US were very important, while 33 per cent indicated that they were unnecessary (see Table 5.2). Those who deemed these measures important further explained that they were being imposed on Africa largely because of the failure of African governments to effectively enforce their own domestic environmental regulations. Also, most countries in the world have committed to reducing emissions and, in this regard, some have implemented environment and trade-related measures not only to reduce emissions but also to protect the environment and address deforestation and degradation. Therefore, the EUDR is a step in the right direction. Those who viewed these measures as unimportant argued that they acted as barriers to trade, hindering African producers and exporters from accessing the EU, UK and US markets.

Additionally, 64 per cent of the respondents were very familiar with the EUDR while the remaining 36 per cent were somewhat familiar. However, all the

Table 5.1 Relevant certification schemes for the EUDR affected commodity sectors.

Sector	Relevant certification scheme
Cocoa	<ul style="list-style-type: none"> • UTZ/Rainforest Alliance • Fairtrade, Organic⁴⁵
Coffee	<ul style="list-style-type: none"> • Fair Trade, UTZ (Good Certified Coffee) • Rainforest Alliance, Organic Certification • Coffee and Farmer Equity (C.A.F.E.) Practices • Global Coffee Platform • Bird-Friendly Certification⁴⁶
Wood	<ul style="list-style-type: none"> • Forest Law Enforcement, Governance and Trade (FLEGT) • Pan African Forest Certification (PAFC) • Forest Stewardship Council (FSC)
Palm Oil	<ul style="list-style-type: none"> • Roundtable on Sustainable Palm Oil (RSPO) • Rainforest Alliance • International Sustainability and Carbon Certification (ISCC) • Roundtable on Sustainable Biomaterials (RSB)⁴⁷
Soy	<ul style="list-style-type: none"> • Roundtable on Responsible Soy (RTRS) • ProTerra Standard⁴⁸

Table 5.2 Respondents' awareness and perspectives on existing environment and trade-related measures of the EU, UK and US.

Category	Responses		
Awareness of environment and trade-related measures of the EU, UK or US	Aware (93%)	Unaware (7%)	
Importance of environment and trade-related measures	Important (67%)	Unimportant (33%)	
Familiarity with the EUDR	Very familiar (64%)	Somewhat familiar (36%)	
Awareness of the scope of products covered by the EUDR	Yes (86%)	No (14%)	
Whether or not a level of risk assessment has been assigned to respective country by European Commission	Has been assigned (43%)	Not assigned (36%)	Unsure (21%)
Awareness of consultation(s) on the design and implementation of the EUDR	Yes (14%)	No (64%)	Unsure (22%)
Participation of respondent and their country in consultation process during the design of the EUDR or any other environment-related trade measure	Yes (21%)	No (58%)	Unsure (21%)
Implementation timeline for the EUDR	Too short (93%)	Just the right period (7%)	

respondents were aware of the timelines for the implementation of the EUDR. Also, 86 per cent of respondents were aware of the scope of products covered by the EUDR while the remaining 14 per cent were not aware. All the respondents were of the view that the EUDR would have a negative impact on the trade of the identified products (see Table 5.2).

All the respondents said that failure to comply with the EUDR requirements would lead to loss of access to the EU market. This would have negative impacts on African economies and put pressure on African countries to change their agricultural practices. Respondents also anticipated that the EUDR would negatively affect farmers and some private sector companies that export products into the European market. Without adequate support from their national government, many smallholder farmers will be excluded from accessing the EU market. These smallholder farmers and some private sector companies, especially MSMEs, lack the resources and capacity to implement the necessary systems to comply with regulations.

Respondents from the wood sector in Ghana and Gabon said that the regulation would have positive impacts on the industry. They mentioned that in some African countries, such as Gabon and Ghana, the wood sector was already highly regulated, with traceability and certification systems – such as FLEGT and FSC certification – in place to ensure sustainable wood extraction. This makes stakeholders within the wood sector in some African countries better prepared to meet the EUDR requirements and to readily supply wood to the EU ahead of other countries that lack such systems. In general, answering the question as to whether African countries are generally better or less prepared to meet the EUDR requirements compared with other regions is complex, especially in the absence of empirical studies directly comparing EUDR readiness levels across continents. However, insights from the joint statement issued by the 17 producing countries from various regions to the EU reveal that all the producing countries will face significant challenges in meeting the EUDR requirements, primarily because of the technical, financial and infrastructural demands of tracking and verifying deforestation-free supply chains. The joint statement also emphasises that the regulation imposes burdens that could overwhelm countries lacking the necessary monitoring systems. These

notwithstanding, African nations may lag behind regions with established compliance infrastructure and resources in terms of their readiness to comply with the EUDR.

All the respondents agreed that the regulation would have a significant negative impact on the economic livelihoods of farmers, women and minority groups if they were denied access to the European market. They all asserted that the EUDR would compel African exporters that did not have systems in place to look for export markets from different regions of the world other than the EU, UK and US. However, some exporters of the affected commodities whose main market is the EU will be compelled to meet the EUDR requirements rather than looking for alternative markets. Moreover, the EUDR is expected to cause initial disruptions in the supply chain for the affected commodities, particularly among processing companies. Some of these companies may delay implementing the required systems or may prefer to closely monitor the overall progress of EUDR implementation before fully committing to compliance.

Also, 43 per cent of the respondents indicated a risk assessment level had been assigned to their country by the European Commission, while 36 per cent indicated no risk assessment had been assigned and 22 per cent were unsure (see Table 5.2).

5.3 Perspectives on the design and implementation of environment and trade-related measures

Regarding the design and implementation of the EUDR, 64 per cent of respondents reported that they were not aware of any consultations by the EU. Also, 22 per cent expressed uncertainty about whether any consultations had taken place. However, the remaining 14 per cent indicated that they were aware the EU had engaged in some consultations (see Table 5.2).

Concerning the design and implementation of the EUDR or any trade and environment-related measure, 58 per cent of respondents stated that neither they nor their country had participated in the EU consultation process, while 21 per cent were unsure about any such consultations. The remaining 21 per cent indicated that, although

they had not personally participated, they were aware that the EU had engaged some civil society organisations (CSOs) and NGOs on the regulation, as well as national regulatory authorities in the cocoa sector through the EU Cocoa Talks initiative (see Table 5.2).

The respondents who had not been consulted explained further that the EUDR as well as other environment and trade-related measures were often designed entirely by the EU, UK and the US, among others, without any prior consultations with and assistance to the countries that would be affected to enable them to implement and comply with these regulations properly. As a result, stakeholders in the affected countries struggle to understand and comply with these regulations.

Prior to introducing the EUDR, the EU conducted an impact assessment, consulting approximately 5,000 stakeholders. However, in many producing countries no regulatory authorities were included in these consultations, as the EU engaged primarily with NGOs and CSOs. This oversight prompted ambassadors from 17 producing countries to express their concerns to the EU, highlighting the lack of meaningful and open dialogue with producing countries during the EUDR’s design and implementation.

In response, the EU launched the Cocoa Talks initiative, bringing together key EU stakeholders, including representatives from member countries, the European Parliament, industry, CSOs and cocoa-producing countries such as Cameroon, Ivory Coast and Ghana. The discussions covered important themes for a sustainable transition in the

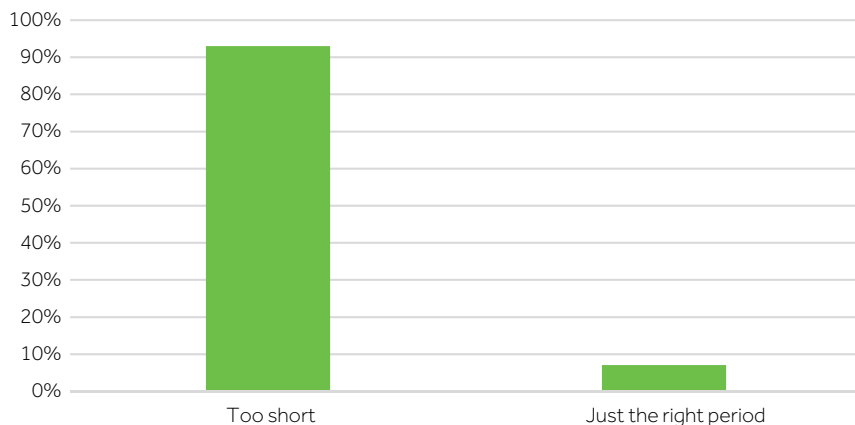
cocoa sector, including living income for farmers, standards, traceability related to child labour and deforestation, due diligence regulations, sustainable cocoa production, development co-operation, financing and the role of EU consumers.

However, this meeting was largely one-sided, with the EU primarily sharing information with producing countries, while the perspectives of and inputs from these countries were not meaningfully considered or incorporated into the discussions.

Also, 93 per cent of respondents indicated that the two-year period for the EUDR was insufficient for many African countries to establish the necessary systems for compliance (see Figure 5.6). They explained that many actors in the supply chains of the affected commodities either were unaware of the EUDR or lacked a clear understanding necessary for effective compliance. This is especially true for small and medium-sized businesses and smallholder farmers, who occupy the lowest tier of the affected commodity value chains. Even within the EU, there are challenges in preparing for full implementation of the EUDR. Several terms in the regulation remain undefined, and the EU has yet to issue the promised guidelines to address these ambiguities.

For example, under the deforestation section of the EUDR, there is a clause that excludes ‘lands under agricultural purposes’, which requires further clarification. However, the EU has not yet provided the necessary guidelines to explain this exemption. Similarly, while Article 10 of the EUDR addresses risk assessment, the EU has not yet developed the methodology to guide this process.

Figure 5.6 Perspectives on the EUDR implementation timeline (% share of survey respondents).



Source: Survey by author (2024).

Furthermore, the information system that is intended to support all users was scheduled to be operational by early November. However, there are concerns about whether it will be ready in time for stakeholders to familiarise themselves with the system and integrate it with their existing data management processes, before the EUDR implementation deadline of 30 December 2024. Also, the country benchmarking system under the EUDR is not yet ready.

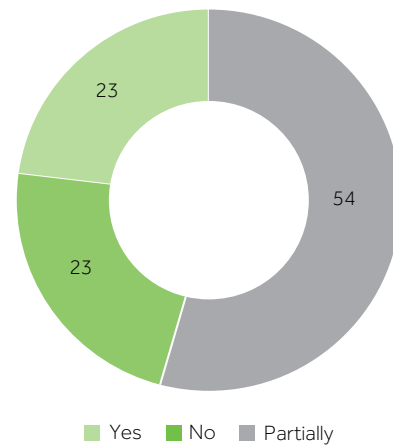
The Ethiopian Coffee and Tea Authority, for instance, has sought a three-year extension to comply with the regulation.⁴⁹ Cocoa-producing countries, in a joint declaration signed in September 2024 at the headquarters of the International Cocoa Organisation (ICCO) in Ivory Coast, expressed concern over the implementation deadlines set by the EU. They described the deadlines as unrealistic given the demands of the regulation. They highlighted that the requirements – ranging from geolocation of cocoa plots to the establishment of a comprehensive traceability system – posed significant challenges.⁵⁰ According to them, the required system is not yet functional, with less than 100 days remaining before the regulation takes effect. Also, they note that the European Commission has not yet provided all necessary documentation or activated the data processing platform.⁵¹

The remaining 7 per cent of respondents indicated that the two-year period for implementation of the EUDR was sufficient. According to them, in spite of the timeline, stakeholders should focus on establishing the necessary mechanisms to facilitate their implementation of the EUDR requirements.

Concerning the level of preparedness to meet the requirements of the EUDR, 23 per cent of respondents indicated that they were ready; another 23 per cent indicated they were not ready while the remaining 54 per cent indicated they were partially ready (see Figure 5.7). They noted that they already had international certifications under which they traded with the EU in some of the affected commodities and, therefore, they had implemented some traceability systems in their processes. However, they will require additional capacity-building on the relevant aspects of the EUDR and also to scale up the traceability systems to cover all the small-scale producers within their respective value chains.

Sixty-two per cent of the respondents stipulated that they had set up the necessary regulations and

Figure 5.7 Perspectives on whether or not respondents are ready to meet the requirements of the EUDR (% share of survey respondents).

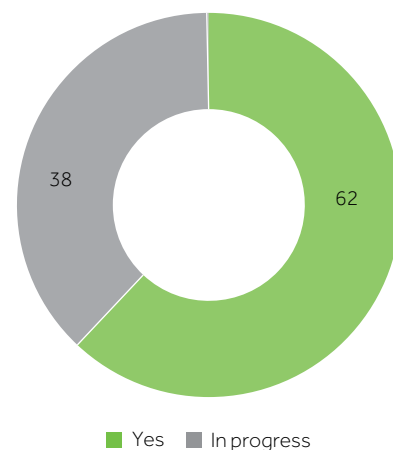


Source: Survey by author (2024).

technical framework for the affected products to meet the requirements of the EUDR. The remaining 38 per cent indicated that these regulations and technical framework were in progress (see Figure 5.8).

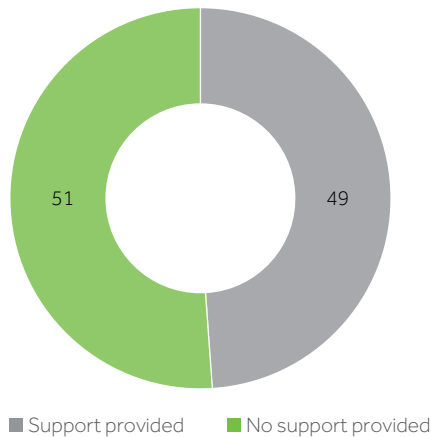
Again, 49 per cent of respondents from the private sector noted that they had received technical training from their government; the remaining 51 per cent indicated they had received no support (see Figure 5.9). However, within the cocoa sector in Ghana, COCOBOD currently covers all costs

Figure 5.8 Whether or not the necessary regulations and technical framework to meet the requirements of the EUDR are in place (% share of survey respondents).



Source: Survey by author (2024).

Figure 5.9 Private sector support received from the national government (% share of survey respondents).



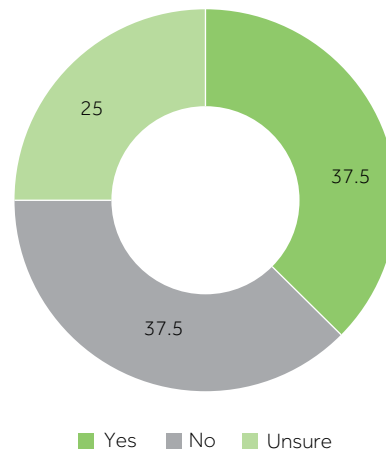
Source: Survey by author (2024).

associated with implementing EUDR systems and requirements in the cocoa sector, ensuring no financial burden is placed on farmers. However, COCOBOD plans to transfer these costs to cocoa buyers by introducing a fee, which will be charged before releasing the relevant EUDR-related data to the buyers. Farmers are required to adhere only to the guidelines provided by COCOBOD.

Furthermore, 37.5 per cent of respondents indicated that, for commodities targeted primarily at markets outside the EU, even with access to information and technical support for entering the European market they would still prefer to export to non-EU markets. This is because the commodities they trade in (such as soyabeans, palm oil and rubber) are not in high demand in the EU. Therefore, there is generally no incentive for them to focus on the EU. On the other hand, 33.3 per cent of respondents stated that, for commodities mainly exported to the EU, such support would not motivate them to pursue exports outside the EU market. Meanwhile, 25 per cent were uncertain whether the additional support would encourage them to explore other markets or continue focusing on the EU (see Figure 5.10).

In terms of training and capacity gaps, all respondents mentioned that they would need

Figure 5.10 Exporter willingness to export to non-EU markets even if they receive information and technical support to access the European market (% share of survey respondents).



Source: Survey by author (2024).

training on due diligence procedures, risk assessment, controls and sanctions. custom procedures and the EUDR in general to enable them to comply better. The participants indicated further that they would require financial and technical assistance to comply with the EUDR. They also highlighted that the European Commission could better assist them by supporting them in the following areas.

- Support for governments and regulatory authorities to scale up EUDR sensitisation across their respective countries and commodity sectors.
- Capacity-building initiatives that emphasise skills transfer from advanced economies and cross-learning experiences.
- Support to regulatory authorities to formalise the various fragmented stakeholders within the seven commodity value chains.
- Support to regulatory authorities in certifying products and producers that meet the necessary compliance standards, as well as in the area of research and development.

6. Implications of the EUDR for Africa

6.1 Trade implications

The EUDR will have a considerable impact on African economies depending on whether they rely on the EU as the primary destination for the exports of the affected commodities. The EUDR could have significant trade implications for African countries that export the affected commodities to the EU. For African governments, failure to adhere to the EUDR could result in being excluded from key international markets, leading to a saturation of the local market with mostly raw and semi-processed products. This situation would result in significant declines in the foreign exchange earnings of African countries, with impacts on the delivery of public services. The regulation could therefore potentially serve as a disguised trade barrier for Africa. On the other hand, countries that comply with the EUDR may gain access to the EU market, potentially increasing exports of sustainably sourced products. Compliance could also open up access to other markets beyond the EU, particularly those where buyers and consumers prioritise sustainably sourced products. African countries will have to review their environmental policies across the affected commodities and beyond and, if possible, harmonise them to ensure their implementation.

For exporters and large plantation owners sourcing from smallholder farmers, the regulation places further responsibilities on them to verify that their suppliers adhere to the regulations, ensuring that the products are sourced from land that is not associated with deforestation. At present, only a limited number of large organisations have established systems and technologies to ensure compliance with the EUDR. These organisations are well positioned to compete with other global suppliers and take advantage of market opportunities that may arise through the EUDR.

Businesses that adapt early to EUDR requirements may gain a competitive advantage in the EU market and they will be more appealing to EU consumers. Businesses that lack the necessary resources, skills and capacity to meet the EUDR regulations may explore alternative markets beyond the EU. This may be short-lived, however, as countries globally

are gradually adopting deforestation regulations. If African producers and exporters are unable to comply with the EUDR, exports to the EU will decline. This will result in a significant loss of foreign exchange earnings for the continent. Businesses may lose their markets and, if they cannot find alternative markets, they could face closure, leading to widespread job losses.

Smallholder farmers are likely to be the most affected by the EUDR, as they often lack access to updated information, are unaware of the regulation and do not have the resources or capacity to meet its technical requirements. As a result, importers and large companies seeking compliant sources of supply may overlook these farmers, which could lead to a loss of livelihood for many, including women, youth and vulnerable groups. Smallholder farmers who are unable to meet EUDR requirements may face exclusion from EU markets. This will reduce their incomes and negatively impact their livelihoods. Also, larger agricultural businesses may dominate the EU market, making it challenging for smallholders to compete.

The EUDR is also expected to increase the cost of commodities because of the stricter compliance with environmental standards and deforestation-free supply chains. Producers in Africa will face higher costs related to certification, monitoring and adapting their practices to meet the new regulations. These extra expenses may be passed on through the supply chain. This will, in turn, increase the overall cost of the identified commodities and their derivatives, which will ultimately be passed on to consumers in the EU. Unfortunately, for the affected commodities, Africa mostly exports them in their raw form and producers find themselves in a vulnerable bargaining position, which reduces them to 'price takers'. Nevertheless, they are required to comply with the regulation. The EU should therefore ensure that producers in African countries, because of their limited capacity to comply, receive adequate support in the form of either financial or technical support, to enable them to comply without incurring excessive costs.

Environment and climate implications

African countries, in complying with the requirements of the EUDR, will ultimately adopt better forest management practices, which, in turn, will help preserve biodiversity. The regulation will encourage sustainable farming practices, enhance climate resilience and reduce the continent's carbon emissions. It will reduce deforestation and land degradation on the continent and contribute to the restoration of degraded lands on the continent. It could also lead to better forest conservation efforts and improved environmental governance through stringent enforcement of existing national policies and regulations, which, hitherto, have been weakly enforced in most parts of the continent. It will also enable African countries to meet their commitments under various national and international climate frameworks as well as existing multilateral environmental agreements.

Investment implications

Regarding investment implications, African governments and regulatory authorities will have to invest in traceability systems and technologies to track commodities from their source to the EU market. They will also have to improve monitoring and enforcement mechanisms to enhance their forest management and conservation practices to maintain access to EU markets.

By putting mechanisms in place to ensure compliance with the EUDR, governments can attract foreign investment in sustainable agriculture and forestry as well as in sectors that are compliant. They may also be able to access international funding and support for projects aimed at reducing deforestation. On the other hand, affected commodity sectors that are not aligned with EUDR guidelines may see reduced investment, as investors will avoid these sectors in order to continue to access the EU market.

For the private sector, complying with the EUDR requires putting in place systems, employing appropriate technology and investing in compliance measures such as certifications and traceability systems. This will increase operational costs, particularly for small businesses. Companies, both traders and operators, may partner with local producers and communities to enhance sustainability in supply chains. Smallholder farmers may benefit from government or NGO initiatives aimed at improving sustainability. They

could also receive funding or training as well as some technologies.

Many smallholder farmers lack the financial and technical resources to comply with the EUDR. This puts them at a disadvantage compared with larger producers unless they are supported by their national governments, private sector entities, donors, NGOs or CSOs.

6.2 Capacity gaps in implementing the EUDR at policy and operational (enterprise) levels

Policy level

Regulatory agencies require technical assistance and capacity-building initiatives that emphasise skills transfer from advanced economies, facilitate cross-learning experiences and formalise the various fragmented stakeholders within commodity value chains. This support will empower these agencies to fulfil their mandates effectively, ensuring the sectors they oversee are well organised and capable of complying with the EUDR. Also, they will require assistance in certifying products and producers that meet the necessary compliance standards, as well as in the area of research and development.

Enterprise level

Capacity-building should focus on MSMEs and smallholder farmers. Several large multinational corporations operating in Africa already possess the necessary expertise, capabilities and technology to meet the requirements of the EUDR and, as such, do not require further training.

The EU can enhance capacity-building efforts in African nations by initially focusing on raising awareness and educating all stakeholders involved in the affected commodity supply chains. This initial awareness is critical to ensure all parties understand the regulation and to enable them to comply. Also, a strong agricultural extension support system should be created to provide ongoing support to farmers to facilitate and sustain their compliance.

Moreover, the EU, working through national governments, should consider offering financial aid and necessary equipment and technology to support stakeholders in establishing the systems required to ensure compliance with the regulation. In addition, the primary responsibility for ensuring

compliance with the EUDR falls on EU importers, who must conduct due diligence to verify that their supply chains are deforestation-free. These importers, in fulfilling their due diligence obligations, should invest in their suppliers by providing them with capacity-building and adequate technical support to enhance their compliance. This

approach would help ensure suppliers in Africa are not left to bear the compliance burden alone.

Furthermore, MSMEs and smallholder farmers will need technical support to meet compliance obligations, including on due diligence, risk assessment, control measures, sanctions and customs processes.

7. Conclusions and Recommendations

7.1 Conclusions

The design and proposed implementation of the EUDR is aimed at reducing deforestation and degradation by prohibiting the consumption of commodities and products from deforested and degraded land. African countries, some of which are major producers and exporters of all of the covered commodities, are likely to be affected if they fail to comply with the requirements of the EUDR. The potential impacts, however, are likely to vary across the different commodities.

Africa could lose US\$11 billion if it fails to comply with the EUDR because 27.4 per cent of the affected commodities exported from the continent is directed to the EU. Non-compliance or delayed compliance with the EUDR could have a significant impact on cocoa producers and exporting countries in Africa as the EU alone accounted for over half (59.4 per cent) of Africa's cocoa and cocoa preparations exports in 2023. Overall, Africa's total exports of cocoa and cocoa preparations to the EU are made up of 62.6 per cent cocoa beans and 37.4 per cent derived products of cocoa (see Table 7.1). Cocoa producers, processors and exporters in Africa will therefore have to ensure they comply strictly with the EUDR requirements, given that cocoa is very significant to African producing economies such as Ivory Coast and Ghana. Also, because cocoa production is often linked to deforestation, African economies that rely heavily on EU markets may face significant pressure to comply with the regulation. Already, countries like Ivory Coast and Ghana have implemented traceability systems within the cocoa sector and therefore have the capacity to meet the requirements.

For coffee, the impact of the EUDR in the case of non-compliance or delayed compliance could also be high, as the EU is also a leading destination for Africa's coffee exports, absorbing 41.6 per cent of the continent's total coffee output in 2023. All of Africa's coffee exported to the EU is in raw form (see Table 7.1). Much like for cocoa, coffee cultivation is linked to deforestation as the

demand for agricultural land grows in regions where coffee is a key crop. African coffee producers are therefore under pressure to adopt sustainable agricultural practices to ensure their crops remain compliant with the EUDR. To maintain access to the European market, African nations involved in coffee production will need to implement systems that guarantee traceability of the commodity.

Although the EU accounts for 22.5 per cent of Africa's rubber exports, most of the continent's rubber is exported to Asia and North America. Currently, 74 per cent of Africa's rubber exports to the EU is in its raw form and 26 per cent is exported as derived products (see Table 7.1). The EUDR will require regulatory adjustments for rubber exports to the EU, but its short-term impact on Africa's overall rubber sector may be limited. However, with the global shift towards environmental sustainability, Africa will need to implement traceability systems to meet evolving international standards.

Over 80 per cent of Africa's palm oil exports is directed to other African nations, leaving only a limited share (5.5 per cent) for the EU market. Out of the limited amount exported to the EU, the majority (62.5 per cent) is in raw form (see Table 7.1). Although palm oil is considered a high-risk commodity under the EUDR, the minimal export volume to Europe means that African producers may not experience the same immediate regulatory pressures as those in the cocoa and coffee industries. However, the use of palm oil as an input for the production of other commodities and the growing global push for sustainability could gradually affect trade within Africa itself. In addition, African countries' inability to comply with the EUDR will also limit potential growth in African exports of palm oil to the EU market in the future.

The majority of Africa's soybean exports are directed to India, with the EU accounting for only 5 per cent of the continent's total soybean exports. This suggests that the EUDR will have minimal direct impact on Africa's soybean producers. However, given that 5.2 per cent of Africa's soybean oil exports are destined for the EU (with

Table 7.1 Shares of Africa's exports of the affected commodities and their derivatives to the EU, average 2021–2023.

Product	Share of main product export to EU (%)	Share of derived product exports to EU (%)	Main countries affected
Cattle	0	100	South Africa, Morocco, Egypt, Ethiopia, Namibia, Botswana, Algeria, Kenya
Cocoa	62.6	37.4	Ivory Coast, Ghana, Cameroon, Nigeria, Guinea, Sierra Leone, Uganda, DRC, Togo, Republic of Congo
Coffee	100	0	Uganda, Ethiopia, Kenya, Tanzania, Rwanda, Burundi, Cameroon, DRC, Ivory Coast, Zambia, Republic of Congo
Palm oil	62.5	37.5	Gabon, Ivory Coast, Sierra Leone, São Tomé and Príncipe, Ghana, Liberia, Togo, Guinea
Rubber	74	26	Ivory Coast, Morocco, South Africa, Egypt, Ghana, Nigeria, Cameroon, Liberia, Djibouti, Guinea, Tunisia, Gabon, Algeria
Soy-bean	4.1	95.9	Togo, South Africa, Nigeria, Burkina Faso, Uganda, Benin, Egypt, Morocco, Ghana
Wood	3.2	96.8	Cameroon, Gabon, Congo, Morocco, Ivory Coast, Namibia, South Africa, Ghana, Tunisia, DRC, Egypt, Mozambique

Source: Author's computation based on data from ITC Trade Map.

95.9 per cent exported as derived products, as Table 7.1 shows), processors and exporters will still be required to comply with the EUDR, which will indirectly affect them. African countries seeking to expand their soybean exports to the EU will need to align their production practices with the regulatory requirements to ensure market access. Also, African countries' inability to comply with the EUDR will limit potential growth in African exports of soybeans to the EU market in the future.

With 27.5 per cent of Africa's wood and charcoal exports going to the EU (of which 96.8 per cent is processed), the forestry sector will be significantly affected by the EUDR should there be non-compliance or delayed compliance. African countries exporting to the EU will have to strengthen forest governance, enforce sustainable logging practices and ensure transparency in their supply chains to meet EUDR requirements.

Stakeholders in African countries, while agreeing with the objectives of the EUDR, are concerned about the absence of engagement and consultations, leading to lack of awareness of its

requirements, making the two-year compliance period challenging. Multinational companies tend to be well informed thanks to support from their parent organisations. In contrast, smaller exporters and local businesses rely on their own research for information, with many local actors, especially smallholder farmers, lacking sufficient knowledge of new market requirements.

African governments and stakeholders are also concerned that the initiatives and legal frameworks implemented have not been taken into account in EUDR design and implementation. For example, African operators and producers of the covered value chains have for decades implemented a number of sustainability and certification initiatives (e.g. the Cocoa Forest Initiative of the World Cocoa Foundation, the RSPO, among others), most of which address deforestation and degradation. Where laws have been inadequate, legal frameworks have been strengthened and afforestation and other land restorative initiatives as well as traceability systems have been implemented. However, the coming into force of the EUDR will necessitate another layer of compliance

requirements, with cost implications in terms of systems and personnel for supply chain actors.

While African countries have established regulations related to forest management, land use, labour standards and environmental protection, enforcement is often weak and inconsistent. This leads to unsustainable practices in the cultivation of commodities covered by the EUDR. Several African countries have implemented traceability systems for commodities linked to deforestation; however, these systems typically focus only on major exported commodities. This leaves other affected commodities unmonitored.

Compliance with the EUDR is essential for Africa's economic development, as failure to adhere could lead to reduced exports and significant foreign exchange losses. To address these challenges, there is a pressing need for capacity-building initiatives at both policy and enterprise levels. Regulatory agencies require technical assistance to effectively implement the EUDR, while MSMEs and smallholder farmers need targeted support to meet compliance obligations. The EU has an important role in facilitating this support through financial aid, technology and education to ensure all stakeholders can adapt to the new regulations.

While a transition period has been given for operators (those in the EU) and value chain actors (those in Africa and other exporting countries) to put in place the measures to comply with the EUDR, African governments seem to be the ones taking up the cost of setting up traceability systems and supporting value chain actors in their countries with meeting the due diligence requirements. There has also been some level of EU support in terms of funding, albeit small, to support countries like Cameroon to meet EUDR requirements in the cocoa sector, as the country is the third largest cocoa exporter in Africa.

Although many African countries have systems in place to monitor deforestation, they remain concerned about the EUDR as a result of its strict due diligence requirements. According to the stakeholders interviewed, existing monitoring and certification systems in Africa ensure that products exported from the continent meet international market requirements including those of the EU. However, many African nations struggle with weak and inconsistent enforcement as they lack the infrastructure and resources to implement these systems nationwide, especially to include

the numerous smallholder farmers. Except in the case of interventions by donors and national governments that support smallholder farmers, it is usually the large-scale producers that are most able to meet these requirements and export to the EU. Also, existing deforestation monitoring systems are not implemented in all commodity sectors across the continent, only in those that are of high national priority for specific countries. Even within these high-priority sectors, there are still capacity and resource issues that hinder effective implementation. These systems can be replicated in other sectors after they have been successfully implemented in the high-priority sectors, but this has not been fully achieved in many African countries. African countries will therefore struggle to meet the EUDR's detailed traceability and verification standards.

7.2 Recommendations

Deforestation and degradation in Africa are happening at a fast pace and, hence, as a matter of urgency, African countries must enforce existing land use, environmental, forestry management and biodiversity policies and regulations. Where there are weaknesses and gaps, existing legal frameworks must be revised to bring them up to date and ensure they reflect and balance existing challenges and the interests of various stakeholders. In addition, governance mechanisms around land use, environmental, forestry and biodiversity management must be strengthened. African governments can leverage the EUDR requirements to strengthen existing systems for land use and traceability.

A major factor driving agricultural expansion – and, consequently, deforestation and degradation – is the low and declining yields of certain key crops. To maintain or increase production levels, these commodities often need to be grown on newly cleared land. It is important, therefore, that African governments invest in agricultural research and development to create and promote high-yield, climate-resilient crop varieties. They should also improve access to modern farming technologies and promote sustainable practices in order to boost productivity and increase yields. This will ensure farmers increase productivity without expanding the current footprint of agricultural land.

In the short to medium term, depending on their ability to adapt to EUDR requirements, countries

can use the EUDR to prioritise the development of local industries that process raw materials. By investing in manufacturing and processing capabilities, African countries can transition from being mere suppliers of unprocessed commodities to being value-added producers. African nations should develop regional value chains that encompass the entire production process of the affected commodities – from raw material extraction to processing and distribution. This can be achieved by harmonising existing national and regional policies, standards and infrastructure investments related to the production and processing of the affected commodities; establishing shared processing facilities through collaborations among neighbouring countries; developing policies that focus on skills training tailored to the various segments of affected commodity value chains; incentivising private and foreign direct investments; and providing capacity-building support to local producers to engage in value-added activities at different stages of the affected commodity value chains. They can also develop strategic partnerships with international and continental organisations to secure funding for targeted projects. This approach will reduce African countries' dependency on external markets, which are increasingly introducing new and strict regulations. The African Continental Free Trade Area (AfCFTA) provides the opportunity for African countries to target other markets on the continent and also diversify into value-added processing for the African market and markets in Asia and Latin America.

Through the AfCFTA Secretariat and African Union organs, African countries must engage with the EU to discuss, make inputs into and agree on modalities for implementation of the EUDR. The EU has a number of economic partnership agreements with many producing countries that could be leveraged to discuss the implementation. On the other hand, regulatory bodies in the EU, UK and US should engage in more comprehensive consultations with affected countries and stakeholders during the design of environment and trade-related measures. This will ensure that local needs and capacities are

considered, facilitating smoother implementation and compliance with regulations. In the case of the EUDR, the EU is primarily asking African countries to meet its own checklist of requirements, without considering the unique circumstances surrounding the production of the relevant commodities in Africa. To create more effective policies, the EU should engage directly with African countries to better understand their operations and challenges in the relevant commodity sectors. This approach would make EU policies more relevant and beneficial to African producers.

To ensure smoother implementation and compliance with the EUDR, African countries can consider engaging with the EU for development assistance or compliance package to help them develop capacity to implement and comply with the regulation. Complying with the EUDR imposes additional costs on businesses and value chain operators. Besides the EUDR, the EU's Corporate Sustainability Due Diligence Directive will require EU businesses and their African counterparts to protect human rights and the environment. To the extent possible, some of these compliance costs could be charged as premium prices to consumers, to enable businesses to recover the costs of regulatory requirements. For businesses that have implemented a number of certification and environmental standards, equivalence systems can be established to reduce the burden of compliance. The EU can establish mechanisms for supporting smallholder farmers' and MSME exporters' compliance with the EUDR through targeted capacity-building initiatives aimed at regulatory agencies, private sector businesses and smallholder farmers. These programmes should focus on improving stakeholders' understanding of the EUDR, skills transfer, technical support and the development of systems and technologies necessary for compliance. In addition, the EU could support increased awareness creation and access to information on EUDR requirements. This can be achieved through awareness campaigns, educational resources and the establishment of strong agricultural extension support systems to assist them in meeting technical standards.

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Annex 1: Key EU Compliance Standards and Certifications Applicable to Exporters and Smallholder Farmers in Africa in EUDR Affected Commodity Value Chains

Table A1.1 Some EU compliance standards applicable to exporters and smallholder farmers in Africa.

	Category	Standards
1.	Pesticide and chemical residue limits	<ul style="list-style-type: none"> - Regulation (EC) No. 396/2005 - Regulation (EC) No. 1881/2006 - Regulation (EU) No. 540/2011 - Regulation (EU) 2020/1085 - Regulation (EU) 2020/749 - Regulation (EC) No. 1907/2006 (for REACH)
2.	Food safety and hygiene	<ul style="list-style-type: none"> - Regulation (EC) No. 178/2002 - Regulation (EC) No. 1935/2004 - Regulation (EC) No. 2073/2005 - Codex Alimentarius Code of Hygienic Practice for Tree Nuts - UNECE Standard for Cashew Kernels - ISO 22000 - Regulation (EC) No. 1235/2008
3.	Organic and agricultural standards	<ul style="list-style-type: none"> - Regulation (EU) 2018/848 (Organic) - Regulation (EC) No. 1333/2008 (Organic) - Organic Regulation (EU) 2018/848 - Delegated Regulation (EU) 2021/1697 - Delegated Regulation (EU) 2021/1698
4.	Health and nutrition	<ul style="list-style-type: none"> - Regulation (EC) No. 1925/2006 - Regulation (EC) No. 1333/2008 - Regulation (EC) No. 1334/2008

(Continued)

Table A1.1 Some EU compliance standards applicable to exporters and smallholder farmers in Africa.

	Category	Standards
5.	Environmental and safety	<ul style="list-style-type: none"> - European Due Diligence Act - Regulation (EC) No. 1272/2008 - Regulation (EU) 655/2013 - EU Directive 2019/904
6.	Plant health and protection	<ul style="list-style-type: none"> - Regulation (EU) 2019/2072 - Implementing Directive (EU) 2019/523 - Regulation (EU) 2016/2031
7.	Specific products	<ul style="list-style-type: none"> - Regulation (EC) No. 2006/647 - Regulation (EC) No. 1907/2006 (for REACH)

Table A1.2 Some certification schemes applicable to Africa's exports of affected commodities and their derivatives to the EU.

	Certification	Requirements/focus
1.	Bird Friendly® Coffee	<ul style="list-style-type: none"> - Certified organic (EU or NOP) - Sustainable agricultural practices - Environmental sustainability
2.	British Retail Consortium Global Standards (BRCGS)	<ul style="list-style-type: none"> - Quality management system - Required legal requirements - Traceability - Hazard analysis and critical control points (HACCP) system - Good manufacturing practice/Good hygiene practice - Structural improvements
3.	Business Social Compliance Initiative (BSCI)	<ul style="list-style-type: none"> - Freedom of association and collective bargaining - Fair remuneration - Occupational health and safety - Special protection for young workers - No bonded labour - Ethical business behaviour - No discrimination - Decent working hours - No child labour - Environmental protection

(Continued)

Table A1.2 Some certification schemes applicable to Africa's exports of affected commodities and their derivatives to the EU.

	Certification	Requirements/focus
4.	Coffee and Farmer Equity (C.A.F.E.) Practices	<ul style="list-style-type: none"> - Social responsibility (safe, fair work environment, minimum wage, zero tolerance for child labour) - Environmental leadership (sustainable practices, forest conservation, no prohibited pesticides) - Quality (high-quality arabica coffee with premiums for ethically sourced products)
5.	Fair for Life	<ul style="list-style-type: none"> - Respect human rights and fair working conditions - Respect ecosystems and biodiversity - Sustainable agricultural practices - Positive local impact
6.	Fairtrade	<ul style="list-style-type: none"> - Social development - Economic development - Environmental development - Prohibition of forced labour and child labour
7.	Food Safety System Certification (FSSC) 22000	<ul style="list-style-type: none"> - Food safety management systems - Prerequisite programmes - Quality management systems requirements - Hazard control measures
8.	Global Food Safety Initiative (GFSI)	<ul style="list-style-type: none"> - Quality standard
9.	GlobalG.A.P	<ul style="list-style-type: none"> - Food safety and traceability - Environment (including biodiversity) - Workers' health, safety and welfare - Animal welfare - Integrated crop management - Integrated pest control - Quality management system - HACCP
10.	Hazard analysis and critical control points (HACCP)	<ul style="list-style-type: none"> - Management responsibility - Policy
11.	International Featured Standards	<ul style="list-style-type: none"> - Management systems control - HACCP - Personnel hygiene - Specifications and recipe/formula compliance - Foreign material management - Traceability system

(Continued)

Table A1.2 Some certification schemes applicable to Africa's exports of affected commodities and their derivatives to the EU.

	Certification	Requirements/focus
12.	International Sustainability and Carbon Certification (ISCC)	<ul style="list-style-type: none"> - Implementation of zero-deforestation - Protection of land with high biodiversity value and high carbon stock - Protection of soil, water and air - Compliance with human, labour and land rights - Measurement and reduction of greenhouse gas emissions - Traceability throughout supply chains
13.	International Organization for Standardization (ISO) 22000	<ul style="list-style-type: none"> - Food safety policy - HACCP - Traceability system - Corrective action system - Internal audit programme
14.	ISO 9001:2015	<ul style="list-style-type: none"> - Quality management system requirements
15.	NaTrue	<ul style="list-style-type: none"> - Environmental considerations - Biodiversity protection - Sustainability
16.	Organic	<ul style="list-style-type: none"> - Organic system plan - Inspection report
17.	ProTerra Standard	<ul style="list-style-type: none"> - Human rights - Good labour practices (including preventing child and forced labour) - Good agricultural practices - Deforestation - Biodiversity conservation
18.	Rainforest Alliance	<ul style="list-style-type: none"> - Management - Traceability - Income and shared responsibility - Wage and labour standards - Health and safety
19.	Roundtable on Responsible Soy (RTRS)	<ul style="list-style-type: none"> - Meeting laws and best business practices - Having good working conditions - Respecting and developing links with local communities - Taking care of the environment - Carrying out appropriate agricultural practices

(Continued)

Table A1.2 Some certification schemes applicable to Africa's exports of affected commodities and their derivatives to the EU.

	Certification	Requirements/focus
20.	Roundtable on Sustainable Biomaterials (RSB)	<ul style="list-style-type: none"> - Legality - Planning, monitoring and continuous improvements - Greenhouse gas emissions - Human and labour rights - Rural and social development - Local food security - Conservation - Soil - Water - Air quality - Use of technology, inputs and management of waste - Land rights
21.	Roundtable on Sustainable Palm Oil (RSPO)	<ul style="list-style-type: none"> - Halting deforestation - Treating communities and workers fairly - Protecting wildlife and the environment
22.	Sedex Members Ethical Trade Audit (SMETA)	<ul style="list-style-type: none"> - Labour standards - Health and safety - Environment - Business ethics
23.	Supplier Ethical Data Exchange (SEDEX)	<ul style="list-style-type: none"> - Labour standards - Health and safety - Environment - Business ethics
24.	Sustainability Initiative Fruit and Vegetables (SIFAV)	<ul style="list-style-type: none"> - Smallholder farmer inclusion - Health and safety - Food safety - Water sustainability
25.	Sustainable Trade Initiative for Fruit and Vegetables (SIFAV)	<ul style="list-style-type: none"> - Reduce product environmental footprints - Positive impact on working conditions and living wages - Human rights and environment

Annex 2: Some Regulatory Frameworks and Laws on Land Use, Deforestation and Land Degradation for the 21 Commonwealth African Countries

Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
1. Botswana	<ul style="list-style-type: none"> • Botswana Climate Change Response Policy, Strategy and Action Plan (2021) • National Policy on Natural Resources Conservation and development (1990) • Community Based Natural Resources Policy (2007) • National Forest Policy (2011) • Botswana Land Policy (2019) • Revised National Policy for Rural Development (2002) • National Biodiversity Strategy and Action Plan (2016) • Botswana National Action Programme to Combat Desertification and Drought (2020) • Tribal Land Act (2018) • Herbage Preservation Act (1978) • Forest Act (1968) • Agricultural Resources Conservation Act (1974) • Forest and Range Resources Bill (Draft) (2021) • National Conservation Strategy (1990) • Environmental Assessment Act (2011) (revised in 2021) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • UN Convention to Combat Desertification (UNCCD) • Convention on Biological Diversity (UNCBD) • Convention Concerning the Protection of World Cultural and Natural Heritage (World Heritage Convention) • Gaborone Declaration for Sustainability in Africa • UN Framework Convention on Climate Change (UNFCCC) • Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
2.	Cameroon	<ul style="list-style-type: none"> • Law No. 94/01, Regulating Forests, Wildlife and Fisheries (1994) • Law No. 96/12 relating to environmental management (1996) • Decree No. 95/531/PM on establishing detailed rules for the implementation of the forest regime (1995) • Decree No. 95/678/PM establishing the indicative framework for land use (1995) • Order No. 2001/ 0518/MINEF/CAB • Decree No. 95/678 	<ul style="list-style-type: none"> • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience • Commission of the Forests of Central Africa (COMIFAC) 	<ul style="list-style-type: none"> • UNCCD • CITES
3.	Gabon	<ul style="list-style-type: none"> • Forest Code (Law No. 016/01) (2001) modified by Order No. 11/2008 (2008) and Order No. 008/PR/2010 (2010) • Organic Law No. 039/2023 of 2 November 2023 • Law No. 007/2014 on Environmental Protection (2014) • Constitution of the Republic of Gabon • Law No. 23/2008 of 10 December 2008 on Sustainable Agricultural Development Policy in the Republic of Gabon • Law No. 22/2008 of 10 December 2008 establishing the Agricultural Code in the Republic of Gabon • Law No. 01/2014 of 30 January 2015 regulating the mining sector • Law No. 001/2014 of 1 August 2014 establishing guidelines for sustainable development. • Law No. 007/2014 of 1 August 2014 related to environmental protection 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Central African Forest Initiative 	<ul style="list-style-type: none"> • UNFCCC • UNCCD • UNCBD • CITES

(Continued)

Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
<p>4. The Gambia</p>	<ul style="list-style-type: none"> • National Water Policy (2006) • The Gambia National Adaptation Programme of Action on Climate Change (2007) • National Action Plan to Combat Desertification (2015) • National Biodiversity Strategy and Action Plan (2015–2020) • Draft Agriculture and Natural Resources Policy (2017–2026) • Forest Policy of The Gambia (2010–2019) • National Forestry Strategy (2019–2028) • National Climate Change Policy of The Gambia (2016) 	<ul style="list-style-type: none"> • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience • ECOWAS Forest Convergence Plan 	<ul style="list-style-type: none"> • UNFCCC • UNCCD • UNCBD • CITES
<p>5. Ghana</p>	<ul style="list-style-type: none"> • 1992 Republican Constitution of Ghana • Land Planning and Soil Conservation Ordinance (1953) • Land Planning and Soil Conservation Act (1957) • Minerals and Mining Act (2006) (Act 703) • Administration of 6 Lands Acts (1962) (Act 123) • Minerals and Mining (Amendment) Law (2014) • Control and Prevention of Bushfires Act (1999) (PNDCL 229) • Water Use Regulations (2001) (L.I. 1692) • Timber Resources Management Act (1998) (ACT 547) as amended by Timber Resources Management Act (2002) (ACT 617) • Timber Resources Management and Legality Licensing Regulation (2017) (L.I. 2254) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • ECOWAS Forest Convergence Plan • Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa • International Timber Trade Agreement • West Africa Strategy on Combating Wildlife Crime • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • CITES • UNCBD • UNFCCC • Paris Agreement • UNCCD

(Continued)

Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
6. Kenya	<ul style="list-style-type: none"> • Environmental Management and Co-ordination Act (No. 8 of 1999) • Physical Planning Act (No. 6 of 1996) • Land Control Act (Cap 302) • Sustainable Waste Management Act (No. 31 of 2022) • Forest Policy (2005) • Forest Act (2005) • Forest Conservation and Management Act (2016) • Climate Change Act (2016) • Mining Act (2016) • National Environment Policy (2012) • National Climate Change Action Plan (2018–2022) • Wildlife Conservation and Management Act (No. 47 of 2013) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • UNFCCC • Kyoto Protocol • Convention on the Wetlands of International Importance Especially the Waterfowl Habitat (Ramsar Convention) • International Convention on Substances that Deplete the Ozone Layer • UNCCD • CITES

(Continued)

7.	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
	Eswatini	<ul style="list-style-type: none"> • Constitution of the Kingdom of Swaziland (2005) • Control of Tree Planting Act (No. 7 of 1972) • Environmental Management Act (2002) • Swaziland Environment Authority Act (No.15 of 1992) • Forest Preservation Act (No. 14 of 1910) • Flora Protection Act (No.10 of 2001) • National Decentralization Policy and Strategy (2002) • Private Forests Act 1951 (No. 3 of 1951) • Strategy for Sustainable Development and Inclusive Growth (2017) • National Climate Change Policy (2016) • Draft National Wetlands Policy (2020) • Swaziland National Biodiversity Strategic and Action Plan (2016) • National Climate Change Strategy and Action Plan (2015–2020) • National Emergency Response, Mitigation and Adaptation Plan (2016–2022) • Swaziland National Biodiversity Strategy and Action Plan (2001) • Water Act (No.7 of 2003) • Natural Resources Act (No. 71 of 1951) • Game Act (No. 51 of 1953) • Grass Fires Act (No. 44 of 1955) • Control of Tree Planting (Act No. 7 of 1972) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • UNFCCC • UNCBD

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
8.	Lesotho	<ul style="list-style-type: none"> • Forestry Policy (1997) • Range Resources Management Policy (2014) • Soil and Water Conservation Policy (Draft) (2013) • National Environmental Policy (1998) • National Resilience Strategic Framework (2019) • Environment Act 2008 • Historical Monuments, Relics, Fauna and Flora (Act No. 41 of 1967) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources 	<ul style="list-style-type: none"> • UNCCD • UNCBD • UNFCCC • CITES
9.	Malawi	<ul style="list-style-type: none"> • National Strategy for Sustainable Development (2004) • National Biodiversity Strategy • Malawi Constitution (1995) • Local Government Act (1998) • National Land Policy (2002) • National Parks and Wildlife (Amendment) Act (2004) • Malawi's National Adaptation Programme of Action (2006) • National Climate Change Investment Plan (2013) • National Climate Change Policy (2015) • Land Act (2016) • Customary Land Act (2016) • National Forest Policy (2016) • National Climate Change Management Policy (2016) • Forestry (Amendment) Act (2016) • Environmental Management Act (2017) 	<ul style="list-style-type: none"> • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience • African Convention on the Conservation of Nature and Natural Resources 	<ul style="list-style-type: none"> • UNCCD • UNFCCC • UNCBD • CITES

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
10.	Mauritius	<ul style="list-style-type: none"> • Environment Act (2024) • Environment Protection Act (2008) • Planning and Development Act (2004) • Forest and Reserves Act (1983) • Fishing and Shooting leases Act (1966) • Native Terrestrial Biodiversity and National Parks Act (2015) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources 	<ul style="list-style-type: none"> • UNCCD • UNFCCC • UNCBD • CITES
11.	Mozambique	<ul style="list-style-type: none"> • Land Law (1997) • Forestry and Wildlife Law (1999) • Regulation on Forestry and Wildlife (2002) • Law No. 20/97: The Environmental Act • Law No. 19/97: The Land Act/Land Use Management 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • SADC FLEGT initiative • SADC Protocol on Environmental Management for Sustainable Development • SADC Forest Protocol • SADC Forestry Strategy 2010–2020 • SADC support programme on REDD • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • UNCCD • CITES

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
12.	Namibia	<ul style="list-style-type: none"> • Green Scheme Policy (2008) • Forestry Strategic Plan (1996) • National Drought Policy and Strategy (1997) • Agricultural (Commercial) Land Reform Act (No. 6 of 1996) • Communal Land Reform Act (No. 5 of 2002) • Forest Act (No. 12 of 2001) • Forest Policy (2001) • Amendment to the Nature Conservation Ordinance (1996) • Environment Management Act (2007) • Environmental Assessment Policy (1995) • National Land Policy (1998) • National Resettlement Policy (2001) • Agricultural (Commercial) Land Reform Act (1995) • Communal Land Act (2002) • Draft National Land Tenure Policy (in preparation since 2005) 		<ul style="list-style-type: none"> • UNCCD • CITES

(Continued)

Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
<p>13. Nigeria</p>	<ul style="list-style-type: none"> • Constitution of the Federal Republic of Nigeria (1999), As Amended • Environmental Impact Assessment Decree (No. 86 of 1992) • National Environmental Standards and Regulation Enforcement Agency Act 2007 • Federal Solid and Hazardous Waste Management Regulations (1991). • Nigerian Urban and Regional Planning Act (CAP N138, LFN 2004) • Land Use Act (1978) • Forest Law (1956) • National Forestry Policy (2006) • Nigerian Urban and Regional Planning Act (1992) • Endangered Species Act (1985) • Water Resources Act (1993) • Federal National Park Service Act (1999) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience • Africa Forest Landscape Restoration Initiative • ECOWAS Forest Convergence Plan 	<ul style="list-style-type: none"> • UNCCD • Stockholm Convention on Persistent Organic Pollutants • Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade • Protocol Concerning Cooperation in Combating Pollution in Case of Emergency • Bamako Convention on the Ban of Import into Africa and Transboundary Movement of Toxic and Hazardous Waste • International Plant Protection Convention • CITES • UNCBD • UNFCCC • Kyoto Protocol

(Continued)

Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
14. Rwanda	<ul style="list-style-type: none"> • Constitution of Rwanda (2003, revised in 2015) • Rwanda Environmental Policy (2003) • National Forestry Policy (2010) • Organic Law No. 04/2005 of 08/04/2005 determining the modalities of protection, conservation and promotion of environment in Rwanda • Law No. 43/2013 of 16/06/2013 governing land in Rwanda • Law No. 47/2013 determining the management and utilisation of forests in Rwanda • Law No. 064/2021 of 14/10/2021 governing biodiversity in Rwanda. • Law No. 48/2018 of 13/08/2018 on environment • Law N0 72/2019 29/01/2020 establishing Rwanda Forestry Authority (RFA) with the mandate to ensure growth of forest resources, their management and protection for sustainable development. • Law N0 27/2021 10/06/2021 governing land in Rwanda 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • UNCCD • UNFCCC • UNCBD • CITES • Stockholm Convention on Persistent Organic Polluting Agents • Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade • Bamako Convention on the Ban of the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa • Basel Convention on Control of Transboundary Movements of Hazardous Wastes and their Disposal Ramsar Convention on Wetlands
15. Seychelles	<ul style="list-style-type: none"> • Environment Protection Act (2016) • Town and Country Planning Act (1972) • Seychelles Strategic Land Use Development Plan (2014–2040) • National Parks and Nature Conservancy Ordinance (1971, amended in 1973 and 1982) • State Land and River Reserves Act (Cap 150 of 1903) • Lighting of Fires (Restriction) Ordinance (Cap 232 of 1940) • Forest Reserves Ordinance (Cap 153 of 1955) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources 	<ul style="list-style-type: none"> • UNCCD • CITES

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
16.	Sierra Leone	<ul style="list-style-type: none"> • Forestry Act (1988) • Forestry Policy (2010) • Forestry Regulations (1989) • National Climate Change Policy (2021) • National Protected Area Authority and Conservation Trust Fund Act (2012) • National Water Resources Management Agency Act (2017) • Second National Biodiversity Strategy and Action Plan (2017–2026) • Environment Protection Agency Act (2022) • Forestry Amendment Act (2022) • Local Government Act (2004) • Local Government Act (2022) • Mines and Minerals Development Act (2022) • Updated Nationally Determined Contribution • Wildlife Conservation (Amendment) Act (2022) • Wildlife Conservation Act (1972) • National Environmental Action Plan (2002) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • African Convention on the Conservation of Nature and Natural Resources • ECOWAS Environmental Policy, Abuja • Sustainable Forest Management Framework for Africa • ECOWAS Forest Convergence Plan 	<ul style="list-style-type: none"> • UNCBD • Paris Agreement • UNFCCC • CITES
17.	South Africa	<ul style="list-style-type: none"> • National Environmental Management Act (No. 107 of 1998) • Conservation of Agricultural Resources Act (No. 43 of 1983) • National Heritage Resources Act (No. 25 of 1999) • National Environmental Management: Biodiversity Act (No. 10 of 2004) • National Environmental Management: Protected Areas Act (No. 57 of 2003) • National Environmental Management: Waste Act (No. 59 of 2008) • National Forests Act (No. 84 of 1998) • National Veld and Forest Fire Act (No. 101 of 1998) • Nature and Environmental Conservation Ordinance Act (No. 19 of 1974) • Spatial Planning and Land Use Management Act (No. 16 of 2013) 	<ul style="list-style-type: none"> • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience • African Convention on the Conservation of Nature and Natural Resources 	<ul style="list-style-type: none"> • UNCCD • CITES • UNCCC

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
18.	Tanzania	<ul style="list-style-type: none"> • Environmental Management Act (No. 20 of 2004) • Land Act (No. 4 of 1999) • Village Land Act (No. 5 of 1999) • Land Use Planning Act (No. 6 of 2007) • Forest Act (No. 7 of 2002) • Wildlife Conservation Act (No. 5 of 2009) • Mining Act (No. 14 of 2010) • National Forest Policy (1953) • National Parks Act (Cap. 228) • National Land Policy (2018) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources 	<ul style="list-style-type: none"> • UNCCD • UNFCCC • UNCBD • CITES • Kyoto Protocol • World Heritage Convention • Convention on Migratory Species (Bonn) • Convention on Wetlands of International Importance (Ramsar Convention) • United Nations Convention on the Law of the Sea
19.	Togo	<ul style="list-style-type: none"> • Law No. 2008-005, Framework Law on the Environment • National Environment Policy in Togo (1998) • National Forest Policy (2011) • National Biodiversity Strategy and Action Plan (2003) • National Strategy for the Implementation of the UNFCCC • National Environmental Action Plan (2001) • Togolese Constitution of the Fourth Republic • Law No. 2008-009 of 19 June 2008 on the Forest Code • Decree No. 2017-040/PR of 23 March 2017 laying down the procedure for the environmental and social impact assessment • Order No. 0151/MERF/CAB/ANGE of 22 December 2017 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience • ECOWAS Forest Convergence Plan 	<ul style="list-style-type: none"> • UNFCCC • Kyoto Protocol • UNCBD • Paris Agreement • CITES

(Continued)

	Country	National regulatory frameworks and laws	Regional frameworks	International frameworks
20.	Uganda	<ul style="list-style-type: none"> • National Environment Management Policy and Act (1994) • National Climate Change Policy (2015) • Uganda Strategic Investment Framework for Sustainable Land Management (2010–2020) • National Agriculture Policy (2010) • Uganda Forestry Policy (2001) • National Land Use Policy (2007) • National Land Policy (2013) • National Forestry and Tree Planting Act (2003) • Land Act (1998) • Constitution of Uganda • Uganda Wildlife Act (Cap 200) • Cattle Grazing Act (Cap 43/42) • Mining and Minerals Act (2022) • National Policy for Conservation and Management of Wetlands Resources Policy (1994) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience 	<ul style="list-style-type: none"> • UNCBD • UNFCCC • UNCCD • Stockholm Convention on Persistent Organic Polluting Agents • CITES
21.	Zambia	<ul style="list-style-type: none"> • Forest Act (2015) • Environmental Management Act (2011) • Water Resources and Management Act (2011) • Urban and Regional Planning Act (2015) • Zambia Wildlife Act (2015) • Agriculture Act • Local Government Act (Cap 281) • National Heritage Conservation (Act 173) • Mines and Mineral Development Act (2008) • Energy regulation Act (1995) • Lands Act (Cap 184) 	<ul style="list-style-type: none"> • African Convention on the Conservation of Nature and Natural Resources • SADC 	<ul style="list-style-type: none"> • UNCCD • CITES • UNCBD • UNFCC

Annex 3: Africa's Exports of Affected Commodities to the World and the EU, Average 2021–2023

Commodity	Harmonized System (HS) code	Description	Exports to world (ave. 2021–2023) (\$ '000s)	Exports to EU (ave. 2021–2023) (\$ '000s)	EU share (%)
1. Cattle	010221	Live cattle	155,501	-	0.0
	010229	Live cattle (excl. pure-bred for breeding)	134,722	641	0.5
	0201	Meat of bovine animals, fresh or chilled	159,024	12,517	7.9
	0202	Meat of cattle, frozen	112,243	12,785	11.4
	020610	Edible offal of cattle, fresh or chilled	2,415	2	0.1
	020622	Edible cattle livers, frozen	3,179	26	0.8
	020629	Frozen edible bovine offal (excl. tongues and livers)	7,703	46	0.6
	160250	Other prepared or preserved meat, meat offal, blood, of cattle	19,208	152	0.8
	4101	Raw hides and skins of cattle	38,123	2,110	5.5
	4104	Tanned or crust hides and skins of cattle	100,830	37,792	37.5
	4107	Leather further prepared after tanning or crusting	8,187,995	71,007	0.9
		Total	8,920,941	137,077	1.5
2. Cocoa	1801	Cocoa beans, whole or broken, raw or roasted	6,508,839	3,713,366	57.1
	1802	Cocoa shells, husks, skins and other cocoa waste	441,824	211,482	47.9
	1803	Cocoa paste, whether or not defatted	1,389,297	867,717	62.5
	1804	Cocoa butter, fat and oil	969,244	840,029	86.7
	1805	Cocoa powder, not containing added sugar or other sweetening matter	179,123	117,739	65.7

(Continued)

Commodity	Harmonized System (HS) code	Description	Exports to world (ave. 2021–2023) (\$ '000s)	Exports to EU (ave. 2021–2023) (\$ '000s)	EU share (%)
	1806	Chocolate and other food preparations containing cocoa	569,689	182,447	32.0
		Total	10,058,017	5,932,780	59.0
3. Coffee	0901	Coffee, whether or not roasted or decaffeinated	3,076,962	1,331,458	43.3
		Total	3,076,962	1,331,458	43.3
4. Palm oil	120710	Palm nuts and kernels	8,620	1,501	17.4
	1511	Palm oil and its fractions, whether or not refined	1,627,780	114,293	7.0
	151321	Crude palm kernel and babassu oil	47,701	28,211	59.1
	151329	Palm kernel and babassu oil and their fractions	8,710	1,348	15.5
	230660	Oilcake and other solid residues of palm nuts or kernels	7,298	2,487	34.1
	290545	Glycerol, with a purity of 95% or more	10,191	14	0.1
	291570	Palmitic acid, stearic acid, their salts and esters	12,521	-	0.0
	291590	Saturated acyclic monocarboxylic acids	3,277	176	5.4
	382311	Stearic acid, industrial	8,595	662	7.7
	382312	Oleic acid, industrial	593	3	0.4
	382319	Fatty acids, industrial, monocarboxylic	84,571	21,086	24.9
	382370	Industrial fatty alcohols	112,239	13,125	11.7
		Total	1,932,097	182,905	9.5
5. Rubber	4001	Natural rubber, balata, gutta-percha	2,249,635	653,560	29.1
	4005	Compounded rubber, unvulcanised, in primary forms	9,463	116	1.2
	4006	Unvulcanised rubber in other forms	2,084	10	0.5
	4007	Vulcanised rubber thread and cord	471	9	1.8
	4008	Plates, sheets, strips, rods and profile shapes, of vulcanised rubber	10,901	701	6.4
	4010	Conveyor or transmission belts or belting, of vulcanised rubber	56,736	1,708	3.0
	4011	New pneumatic tyres, of rubber	590,903	130,553	22.1
	4012	Retreaded or used pneumatic tyres of rubber	18,030	960	5.3

(Continued)

Commodity	Harmonized System (HS) code	Description	Exports to world (ave. 2021–2023) (\$ '000s)	Exports to EU (ave. 2021–2023) (\$ '000s)	EU share (%)
	4013	Inner tubes, of rubber	6,727	178	2.6
	4015	Articles of apparel and clothing accessories	18,916	1,502	7.9
	4016	Articles of vulcanised rubber	167,288	93,356	55.8
	4017	Hard rubber	708	10	1.4
		Total	3,131,861	882,663	28.2
6. Soya	1201	Soya beans, whether or not broken	676,301	39,151	5.8
	120810	Soya bean flour and meal	115,156	23,494	20.4
	1507	Soya bean oil and its fractions	2,686,376	872,566	32.5
	2304	Oilcake and other solid residues	1,334,386	16,332	1.2
		Total	4,812,220	951,544	19.8
7. Wood	4401	Fuel wood	289,315	14,639	5.1
	4402	Wood charcoal	107,759	37,800	35.1
	4403	Wood in the rough	735,089	50,334	6.8
	4404	Hoopwood; split poles; piles, pickets and stakes of wood	7,609	2,130	28.0
	4405	Wood wool; wood flour	335	30	8.9
	4406	Railway or tramway sleepers (cross-ties) of wood	4,006	1,770	44.2
	4407	Wood sawn or chipped lengthwise, sliced or peeled	1,498,613	450,734	30.1
	4408	Sheets for veneering	540,023	180,590	33.4
	4409	Wood, incl. strips and friezes for parquet flooring	44,220	18,349	41.5
	4410	Particle board, oriented strand board 'OSB' and similar board	62,878	1,754	2.8
	4411	Fibreboard of wood or other ligneous materials	57,345	312	0.5
	4412	Plywood, veneered panels and similar laminated wood	206,228	68,732	33.3
	4413	Metallised wood and other densified wood	35,855	2,559	7.1
	4414	Wooden frames for paintings, photographs, mirrors or similar objects	4,352	1,688	38.8
	4415	Packing cases, boxes, crates, drums and similar packings, of wood	47,221	10,824	22.9

(Continued)

Commodity	Harmonized System (HS) code	Description	Exports to world (ave. 2021–2023) (\$ '000s)	Exports to EU (ave. 2021–2023) (\$ '000s)	EU share (%)
	4416	Casks, barrels, vats, tubs and other coopers' products and parts thereof	1,216	386	31.7
	4417	Tools, tool bodies, tool handles, broom or brush bodies and handles	1,464	514	35.1
	4418	Builders' joinery and carpentry of wood	103,572	27,321	26.4
	4419	Tableware and kitchenware, of wood	11,100	4,467	40.2
	4420	Wood marquetry and inlaid wood; caskets and cases for jewellery or cutlery,	2,435	13,691	562.2
	4421	Other articles of wood	45,425	14,289	31.5
	47	Pulp of wood or of other fibrous cellulosic material	1,161,199	61,040	5.3
	48	Paper and paperboard	1,981,264	202,139	10.2
	49	Printed books, newspapers, pictures and other products	481,851	30,229	6.3
	9401	Seats, whether or not convertible into beds, and parts thereof	499,096	348,954	69.9
	940330	Wooden furniture for offices	21,713	581	2.7
	940340	Wooden furniture for kitchens	8,879	2,273	25.6
	940350	Wooden furniture for bedrooms	28,051	4,252	15.2
	940360	Wooden furniture	231,899	14,419	6.2
	940391	Parts of furniture, of wood, n.e.s.	2,484	294	11.8
	940610	Prefabricated buildings of wood	2,264	69	3.0
		Total	8,224,761	1,567,163	19.1
Overall total		40,156,858	10,985,591	27.4	

Annex 4: Import Data of Affected Commodities

Cocoa and cocoa preparations

Table A4.1 Top 10 importers of cocoa and cocoa preparations in Africa in 2023.

Importer	Imported value in 2023 (\$ '000)	Share (%)
South Africa	183,292	17.2
Egypt	158,461	14.9
Libya	146,145	13.7
Morocco	134,326	12.6
Algeria	103,131	9.7
Tunisia	43,149	4.1
Nigeria	37,586	3.5
Mauritius	30,351	2.9
Ghana	24,645	2.3
Kenya	17,097	1.6

Source: ITC Trade Map.

Table A4.2 Africa's top 10 import sources of cocoa and cocoa preparations in 2023.

Exporter	Imported value in 2023 (\$ '000)	Share (%)
EU	503,397	47.3
Turkey	94,813	8.9
Ivory Coast	76,798	7.2
South Africa	62,973	5.9
Ghana	56,684	5.3
Malaysia	40,822	3.8
Egypt	28,844	2.7
United Kingdom	26,905	2.5
Indonesia	25,054	2.4
Saudi Arabia	16,851	1.6

Coffee

Table A4.3 Top 10 importers of coffee in Africa in 2023.

Importer	Imported value in 2023 (\$ '000)	Share (%)
Egypt	216,430	22.8
Algeria	151,614	15.9
Sudan	149,959	15.8
Morocco	147,955	15.6
South Africa	99,804	10.5
Libya	77,263	8.1
Tunisia	34,541	3.6
Namibia	9,498	1.0
Kenya	8,203	0.9
Botswana	6,636	0.7

Source: ITC Trade Map.

Table A4.4 Africa's Top 10 import sources of coffee in 2023.

Exporter	Imported value in 2023 (\$ '000)	Share (%)
Uganda	189,754	20.0
Brazil	146,855	15.4
Indonesia	133,448	14.0
EU	86,602	9.1
Vietnam	84,770	8.9
India	57,915	6.1
Ethiopia	52,724	5.5
Ivory Coast	48,478	5.1
Italy	46,505	4.9
Tanzania	30,021	3.2

Source: ITC Trade Map.

Palm Oil

Table A4.5 Top 10 importers of palm oil in Africa in 2023.

Importer	Imported value in 2023 (\$ '000)	Share (%)
World	6,749,762	100
Egypt	1,304,274	19
Kenya	838,932	12
Ethiopia	491,392	7
South Africa	461,984	7
Djibouti	451,585	7
Uganda	311,386	5
Mozambique	250,064	4
Cameroon	180,902	3
Tanzania	174,285	3
Nigeria	171,085	3

Source: ITC Trade Map.

Table A4.6 Africa's top 10 import sources of palm oil in 2023.

Exporter	Imported value in 2023 (US\$1,000)	Share (%)
Malaysia	2,791,585	41.4
Indonesia	2,784,283	41.3
Ivory Coast	216,782	3.2
Djibouti	206,548	3.1
United Arab Emirates	111,364	1.6
Singapore	84,193	1.2
Gabon	63,677	0.9
Kenya	57,752	0.9
Togo	48,277	0.7
South Africa	45,372	0.7

Source: ITC Trade Map.

Rubber

Table A4.7 Africa's top 10 importers of rubber in 2023.

Importer	Imported value in 2023 (\$ '000)	Share (%)
South Africa	67,652	42
Egypt	46,370	29
Liberia	13,451	8
Tunisia	5,906	4
Algeria	5,203	3
Uganda	4,958	3
Nigeria	4,326	3
Ethiopia	3,309	2
Kenya	1,728	1
Morocco	1,186	1

Source: ITC Trade Map.

Table A4.8 Africa's top 10 import sources of rubber in 2023.

Exporter	Imported value in 2023 (\$ '000)	Share (%)
Ivory Coast	36,990	22.9
Indonesia	25,284	15.7
Malaysia	18,690	11.6
Thailand	18,262	11.3
Vietnam	11,316	7.0
Guinea	10,158	6.3
Ghana	8,164	5.1
Nigeria	6,896	4.3
EU	5,224	3.2
Spain	3,944	2.4

Source: ITC Trade Map.

Soybean

Table A4.9 Africa's Top 10 importers of soybean in 2023.

Importer	Imported value in 2023 (\$ '000)	Share (%)
Egypt	1,658,402	57.4
Algeria	770,014	26.6
Tunisia	319,205	11.0
Togo	71,067	2.5
Morocco	21,628	0.7
Zimbabwe	13,774	0.5
Tanzania	11,464	0.4
Rwanda	4,534	0.2
Mozambique	2,985	0.1
Botswana	2,401	0.1

Source: ITC Trade Map.

Table A4.10 Africa's top 10 import sources of soybean in 2023.

Exporter	Imported value in 2023 (\$ '000)	Share (%)
United States of America	923,975	32.0
Brazil	749,465	25.9
Ukraine	654,900	22.7
Canada	240,484	8.3
United States Minor Outlying Islands	98,588	3.4
Uruguay	59,518	2.1
Burkina Faso	53,281	1.8
Argentina	24,624	0.9
Zambia	22,363	0.8
Ghana	17,894	0.6

Source: ITC Trade Map.

Wood and related products

Table A4.11 Africa's top 10 importers wood and related products in 2023.

Importer	Imported value in 2023 (\$ '000)	Share (%)
Egypt	1,276,320	29.0
Morocco	657,194	14.9
Algeria	520,417	11.8
South Africa	361,155	8.2
Tunisia	194,324	4.4
Nigeria	192,411	4.4
Libya	169,223	3.8
Kenya	108,690	2.5
Senegal	82,861	1.9
Somalia	68,809	1.6

Source: ITC Trade Map.

Table A4.12 Africa's top 10 import sources of wood and related products in 2023.

Exporter	Imported value in 2023 (\$ '000)	Share (%)
EU	1,860,744	42
China	647,504	15
Turkey	390,301	9
Russian Federation	317,679	7
South Africa	251,773	6
Eswatini	133,283	3
Thailand	119,271	3
Indonesia	75,540	2
Uganda	61,678	1
United States of America	55,079	1

Source: ITC Trade Map.

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