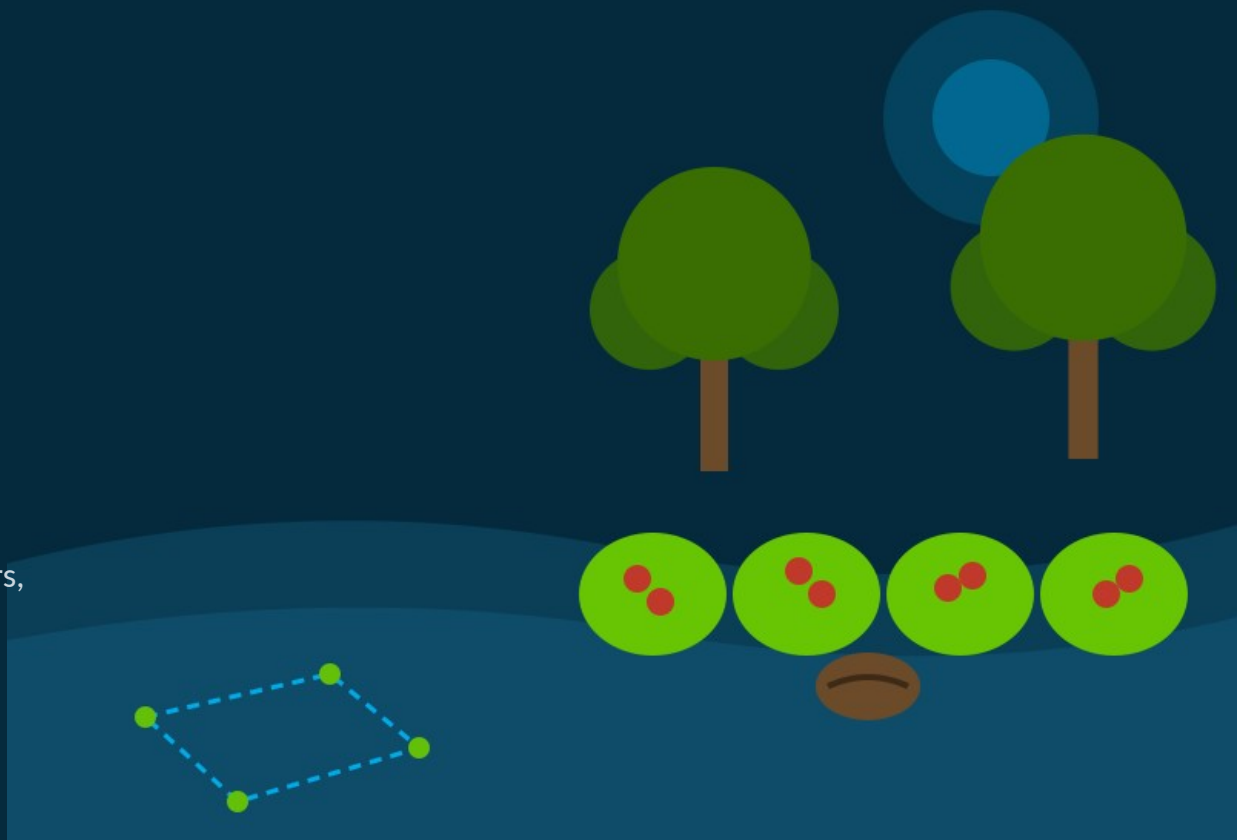
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EUDR and India's coffee supply chains

Green, roasted and instant coffee: what the EU Deforestation Regulation asks, and who in India has to do what



For growers, producer groups, communities, dealers, processors, distributors, exporters, and government agencies and boards

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EUDR in one page

The EU Deforestation Regulation (EU) 2023/1115 lets seven commodities and their products onto the EU market, or out of it as exports, only when three conditions are met.

Deforestation-free

Produced on land not deforested after 31 December 2020. For wood: harvested without causing forest degradation after that date.

Legally produced

Produced in line with the relevant laws of the country of production: land rights, environment, labour, human rights, consent, tax, trade.

Covered by a statement

The EU operator files a due diligence statement in the EU Information System, backed by plot geolocation and evidence from the supply chain.

The seven commodities

Cattle | Cocoa | **Coffee** | Oil palm | Rubber | Soya | Wood

The legal duty sits with whoever first places the product on the EU market or exports it. Indian suppliers have no direct obligation unless they place goods on the EU market themselves, but EU buyers cannot file without their geolocation and legality evidence, so the information has to travel with the goods.

Source: Regulation (EU) 2023/1115, Articles 1–4 and 9.

Key dates and what has changed

29 Jun 2023	EUDR enters into force: Regulation (EU) 2023/1115.
22 May 2025	Country benchmarking adopted: India classified low risk (Implementing Regulation (EU) 2025/1093).
23 Dec 2025	Regulation (EU) 2025/2650 delays the start and lightens duties downstream and for small producers.
4 May 2026	Commission simplification review, with updated guidance and FAQ.
18 Sep 2026	Annex I revised by Delegated Regulation (EU) 2026/2102: removals apply now.
30 Dec 2026	Applies to large and medium operators and traders.
30 Jun 2027	Applies to micro and small operators and traders (from 30 Dec 2026 for products under the old EU Timber Regulation).
30 Dec 2027	Products newly added to Annex I in 2026 come into scope.

What changed for coffee

- Coffee (0901) stays in scope: green, roasted, decaffeinated, husks and skins.
- Soluble (instant) coffee extracts and concentrates are added from 30 December 2027.
- Samples, packing and used goods are out.
- Large and medium EU buyers apply from 30 December 2026; micro and small from 30 June 2027.
- Shade coffee already in coffee by 31 December 2020 is an agricultural plantation, not forest.

Sources: Regulations (EU) 2023/1115, 2025/2650; Implementing Regulation (EU) 2025/1093; Delegated Regulation (EU) 2026/2102; European Commission.

Coffee products in scope

Annex I as revised in September 2026. Check the exact 8-digit CN code with your EU buyer.

HS heading	Products	Status
0901	Coffee, roasted or not, decaffeinated or not; husks and skins; substitutes containing coffee	**In scope**
2101 11 00	Extracts, essences and concentrates of coffee (instant coffee)	**From 30 Dec 2027**
Other	Coffee-flavoured confectionery, drinks and foods outside these codes	**Not listed**

Not covered

- Coffee-flavoured products under other codes
- Preparations of coffee extracts outside 2101 11 00
- Samples of negligible value
- Packing used to carry the coffee
- Used goods and waste

Source: Annex I, Regulation (EU) 2023/1115 as amended by Delegated Regulation (EU) 2026/2102.

What it means for India's coffee sector

3.64 lakh t

Coffee produced in 2024-25; Karnataka about 70%

99.3%

Share of India's 4.07 lakh coffee holdings that are 10 ha or smaller (2021-22)

~37%

Share of FY25 export value (US$1.8 bn) going to Italy, Germany and Belgium alone

What it means

- The EU takes about 45% of India's coffee export volume (2022-23)
- Every EU-bound lot needs the holdings behind it, through curing works and traders
- Satellite maps can misread shade coffee as forest: growers need proof of coffee before 2021
- Instant coffee makers using imported beans need origin geolocation from 2027

Where India is well placed

- Most coffee is long-established shade-grown agroforestry
- Coffee Board registration and export permits already name the curing works
- India Coffee app has an EUDR module for registration and geo-tagging
- India is benchmarked low risk

Sources: Coffee Board database (2023) and production estimates; Coffee Board export data FY25; India Coffee app (Coffee Board, 2026).

Land and forest types under EUDR

EUDR "forest": over 0.5 ha, trees over 5 m (or able to reach it), canopy above 10%, not mainly farm or urban land.

Primary forest

Native species, no clearly visible signs of human activity.

Planting coffee under or in place of primary forest after the cut-off fails.

Naturally regenerating

Forest mainly from natural regeneration, including coppice.

Thinning or underplanting natural forest for new coffee after 2020 fails.

Planted forest

Mainly trees established by planting or deliberate seeding.

Converting planted forest to coffee after the cut-off is deforestation.

Plantation forest

Intensively managed planted forest: one or two species, even age, regular spacing.

Same test: no conversion of forest plantations to coffee after 2020.

Other wooded land

Not forest; over 0.5 ha with trees over 5 m and 5–10% canopy, or mixed tree, shrub and bush cover above 10%.

Not forest, but check satellite history against 2020.

Agricultural use

Farmland and livestock land, including tree-crop plantations of the EUDR commodities (other than wood).

Shade coffee is agroforestry: an agricultural plantation, if it was coffee by 31 December 2020.

Source: Regulation (EU) 2023/1115, Article 2 definitions.

Cut-off date and what it means for coffee

Shade coffee that was coffee on 31 December 2020 is an agricultural plantation, not forest. Coffee set up in or under forest after that date is deforestation.

Can be compliant

- Estates and smallholdings in coffee on or before 31 December 2020
- Replanting and rejuvenating existing coffee, including under silver oak or native shade
- Tribal coffee with Forest Rights Act titles or lawful allotment
- Growers registered on the India Coffee app with plot coordinates

Cannot be placed on the EU market

- New coffee planted by clearing, thinning or underplanting natural forest after the cut-off
- Coffee on encroached reserve forest or government land without title
- Lots that mix in coffee from holdings that cannot be identified
- Instant coffee from imported beans without origin geolocation (from 2027)

Source: Regulation (EU) 2023/1115, Article 2 (deforestation, forest degradation, agricultural plantation).

Sourcing routes: government, private and community land

Government

Coffee on forest-department or revenue land: leases, allotments and encroachments

Evidence usually available

Lease or allotment papers where they exist

Typical gaps

Encroached forest and government land has no lawful title; frequent eviction drives

Fix

Keep only plots with lawful lease or title in EU lots; check forest boundaries

Private

Estates and smallholdings in Karnataka, Kerala and Tamil Nadu

Evidence usually available

RTC/pahani, thandaper or patta; Coffee Board registration

Typical gaps

Joint-family and unsurveyed holdings; customary tenures in Kodagu; few growers yet registered on the app

Fix

Register on the India Coffee app with land record and plot location

Community

Tribal growers in Araku (AP), via GCC and ITDA Paderu, and Koraput (Odisha), via ITDA and state agencies

Evidence usually available

Forest Rights Act titles, ITDA plantation registers, GCC purchase records

Typical gaps

Plantations started on reserve forest land decades ago; legality papers and maps vary

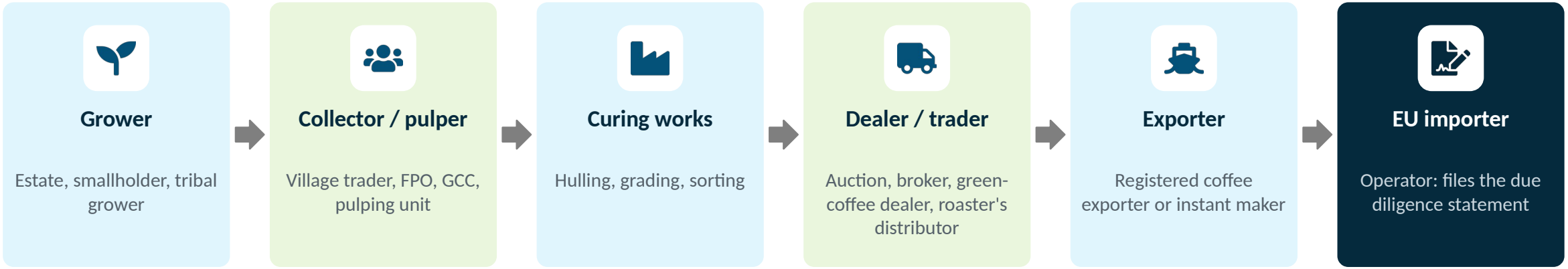
Fix

Pair each plot with its FRA title and map; record new planting against 2020 cover

Sources: Coffee Board; ITDA Paderu and GCC (Araku); Karnataka Forest Department.

From local sourcing to export

Coffee passes through collectors and curing works before traders and exporters, and roasted or instant coffee goes through distributors. Each handover must carry the plot list.



Where the link to the plot usually breaks

Collector pooling

Village traders buy small lots of cherry or parchment and pool them.

Curing outturn

Curing works grade and blend lots; outturn must keep the grower list.

Imported beans

Instant coffee makers also use imported robusta; keep it out of Indian-origin lots.

Sources: Coffee Board export registration and permit rules; Coffee Act 1942.

Each custodian: role and documents

Custodian	Role under EUDR	Keeps on file	Passes on with the goods
Grower	Origin. Not an EUDR operator; supplies the facts	Land record, Coffee Board registration, app ID	Plot ID and geolocation, sale slip with quantity
Collector / pulper	Trader in India. Keeps the grower link	Purchase slips by grower, trade licence, GST	Lot list with grower and plot IDs
Curing works	Processes. Must not blend unknown input	Coffee Board registration, outturn and lot registers	Outturn ID with plot list, GeoJSON
Dealer / trader	Trades or distributes. Keeps lots apart	Sale contracts, invoices, e-way bills	Lot IDs and data pack, unchanged
Exporter	Assembles the buyer's data pack	IEC, Coffee Board registration and export permit, ICO certificate of origin	Product, HS code, quantity, geolocation, legality evidence, supplier details
EU importer	Operator: due diligence and statement	Everything received, for five years	Statement reference number to EU customers

Source: Regulation (EU) 2023/1115 as amended by Regulation (EU) 2025/2650 (operator, trader, downstream roles; Article 12 records).

Legal production: what to show under Indian law

EUDR lists the areas of law the product must comply with in the country of production. For each, keep the evidence ready.

EUDR legality area	Indian law and rules (coffee)	Evidence to keep
Land use rights	Land revenue codes and records (RTC, thandaper, patta); Indian Forest Act 1927 and state forest acts	Record of rights or lease; proof the plot is not forest land, or forest clearance
Environmental protection	Environment (Protection) Act 1986, including eco-sensitive zones; Wildlife (Protection) Act 1972 (protected areas)	Plot outside protected areas, or the permission that allows the activity
Forest rules	Van (Sanrakshan Evam Samvardhan) Adhiniyam 1980 as amended 2023; state tree preservation acts (e.g. Karnataka Preservation of Trees Act)	Plot not on forest land, or lawful title; tree-felling permission for native shade trees
Third-party rights	Forest Rights Act 2006; PESA Act 1996 in Scheduled Areas	No unresolved rights claims on the plot; title or rights record
Labour rights	Wage, child-labour and workplace-safety law, including the Labour Codes; Plantations Labour Act 1951 now subsumed in the OSH Code	Wage and attendance records; no child labour; safety records
Human rights	Constitutional rights; Bonded Labour System (Abolition) Act 1976	No forced or bonded labour; grievance records
Free, prior and informed consent	Gram sabha consent (Forest Rights Act and forest-diversion rules) or consultation (PESA) where rights holders are affected	Gram sabha resolution where it applies
Tax, anti-corruption, trade and customs	Coffee Act 1942 and Coffee Rules 1955 (registration, export permits); GST; Prevention of Corruption Act 1988; Customs Act 1962	Coffee Board export permit, ICO certificate of origin, GST invoices, shipping bill

Sources: India Code (Acts as cited); Ministry of Labour (Labour Codes in force 21 Nov 2025).

Geolocation and traceability

Every plot, located

Latitude/longitude to six decimal places. Plots up to 4 ha: one point is enough. Over 4 ha: a polygon of the boundary.

No unknown inputs

Material from plots you cannot locate cannot be mixed into an EU-bound lot. A lot must list every plot that contributed to it.

Kept and shared

Data travels as GeoJSON to the EU operator, who files it in the EU Information System. Records are kept for five years.

How to do it for coffee

- Most holdings are under 4 ha: one GPS point is enough; estates need a polygon
- Register on the India Coffee app with land record and plot location
- Keep proof the plot was coffee before 2021: photos, Board records, old receipts
- Expect false forest alerts on shade coffee and answer them with evidence
- Carry plot or lot IDs through curing works outturns
- Keep imported beans in separate lots

Source: Regulation (EU) 2023/1115, Articles 2 and 9; EU Information System guidance.

India is "low risk": what that does and does not mean

What gets easier

- EU operators can use simplified due diligence: no risk assessment or mitigation unless concerns arise, but they must still check for mixing with other origins.
- Lower rate of checks by EU authorities for low-risk origins.
- Micro and small producers that sell to the EU market themselves can file a one-off simplified declaration. Most Indian growers are not the operator.

What stays the same

- Products must still be deforestation-free and legally produced.
- Geolocation of every plot and the supply-chain information under Article 9 must still be collected.
- A concern raised by an NGO, buyer or satellite alert brings back full due diligence for that supply.
- The rating covers India only. Inputs from other countries carry their own origin's rating.



Imported coffee beans carry their own country's risk level. Instant coffee made for the EU from imported robusta (in scope from 30 December 2027) needs plot geolocation from the country where it was grown.

Sources: Implementing Regulation (EU) 2025/1093; Delegated Regulation (EU) 2026/2102.

What to do now, by audience

Growers, producer groups and communities

- Register on the India Coffee app and add the plot location
- Keep the land record and proof of coffee before 2021
- Keep native shade; do not clear forest for new coffee
- Keep a sale slip for every lot

Dealers, processors, distributors and exporters

- Collect grower IDs and plot data at purchase
- Keep lots separate through curing and trading
- Link each export permit to its farm list
- Get origin data for imported beans before 2027

Government, boards and agencies

- Speed up app registration through camps and Akshaya or CSC centres
- Confirm tenure for tribal and estate land, including FRA titles
- Publish a 2020 shade-coffee land-use map to answer false alerts
- Add traceability to the proposed Coffee (Promotion and Development) Bill

Source: S360 analysis based on the sources on earlier slides.

A 90-day path to 30 December 2026

Days 1–30

Map

- List EU-bound products and HS codes
- List suppliers, dealers and plots behind each
- Name a person responsible for EUDR data

Days 31–60

Collect

- Capture plot points and polygons
- Check each plot against 2020 forest cover
- Assemble legality documents per source

Days 61–90

Operate

- Segregate EU-bound lots end to end
- Issue a data pack with each lot
- Train field staff, dealers and buyers

How S360 can help

S360 helps organisations build and operate responsible supply chains, across Advisory, Implementation and Digital: supplier and plot mapping, legality evidence files, lot-level traceability, buyer data packs and training for field teams. Certification and verification decisions rest with independent bodies; compliance decisions rest with the EU operator.

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General information prepared in October 2026, not legal advice. EUDR texts, guidance and Annex I continue to change: check the current EU text and your buyer's requirements before acting.

References

EUDR and India's coffee supply chains · sources by slide, checked October 2026. Regulation texts: eur-lex.europa.eu

Slide 2 https://eur-lex.europa.eu/eli/reg/2023/1115/oj · https://eustafor.eu/eudr-what-the-commissions-4-may-2026-simplification-package-means-for-wood-state-forests-and-non-eu-operators/

Slide 3 https://eur-lex.europa.eu/eli/reg/2025/2650/oj · https://trade.ec.europa.eu/access-to-markets/en/news/delay-until-december-2026-and-other-developments-implementation-eudr-regulation · https://eur-lex.europa.eu/eli/reg_impl/2025/1093/oj · https://www.hlc.com/en/publications/eu-deforestation-regulation-commission-publishes-simplification-package-ahead-of-december-2026 · https://polygon-one.com/en/eudr-annex-i-delegated-regulation-2026-2102 · https://www.coolset.com/academy/eudr-product-scope-changes-are-official-what-the-july-2026-delegated-regulation-means-for-compliance

Slide 4 https://eur-lex.europa.eu/eli/reg_del/2026/2102/oj/eng/pdf · https://help.prewave.com/en/articles/310638-eudr-relevant-hs-codes-based-on-annex-i

Slide 5 https://www.deccanherald.com/amp/story/india%2Findias-coffee-output-to-see-marginal-growth-in-fy26-as-climate-woes-mar-production-3800945 · https://coffeeboard.gov.in/Database/DATABASE3_JAN2023.pdf · https://currentaffairs.khanglobalstudies.com/eudr-compliance-for-indian-coffee/ · https://ground.news/article/coffee-board-launches-app-to-ease-eu-export-registration

Slide 6 https://eur-lex.europa.eu/eli/reg/2023/1115/oj

Slide 8 https://www.thenewsminute.com/delve/araku-s-coffee-world-famous-why-are-its-farmers-still-struggling-97381 · https://www.deccanherald.com/india/karnataka/forest-department-moves-to-reclaim-580-acres-of-forest-land-in-chikkamagaluru-3775310

Slide 12 https://eur-lex.europa.eu/eli/reg/2023/1115/oj · https://www.coolset.com/academy/eudr-geolocation-requirements-how-to-collect-and-validate-gps-polygon-data-for-your-dds

Slide 13 https://eur-lex.europa.eu/eli/reg_impl/2025/1093/oj · https://www.compliancegate.com/eudr-country-risk-classification/ · https://www.fieldfisher.com/en/insights/the-eu-deforestation-regulation-european-commission-classifies-countries-as-high-low-or-standard-risk · https://ploum.nl/en/news/eudr-postponed-and-simplified-what-regulation-EU-2025-2650-really-changes

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