



Global Platform for Sustainable Natural Rubber

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Operational Guidance for EUDR

- Way for tiremakers to give upstream stakeholders guidance
- Multi-stakeholder development
- Finalized into slide deck for public consultation



Link to Operational Guidance:
<https://bit.ly/gpsnr-ops-guidance>



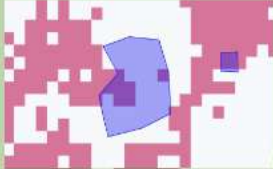
Link for feedback: bit.ly/gpsnr-ops-guide-feedback

Content Summary

1. Basic Requirements

Basic Requirements

Article 9: Information Collection for each farm

Requirements	(1)	(2)	(3)	
	Geolocation (polygon mapping)	Deforestation-free analysis	Legality	
			a) Right-of-use (land documentation) 	b) Environmental + Social/Labor laws, Human rights/FPIC 
How to check:	Physical mapping on the ground	Use (1) to cross-check with satellite monitoring tools.	On-site visit: Collect land documentation information	On-site visit: Collect data on-site to assess farmer practices, labor practices etc.
Supplement with:	Government land database (only for full-official land deeds, still need on-site visits for correspondence)	On the ground checks (ground truthing) and data collection	Cross-checks with government land database (applicable only for full-official land deeds)	Other online databases or spatial maps (e.g., watershed map, topographical map, indigenous and land conflict database)

(4) Other important information: identification data, volume quota

Content Summary

1. Basic Requirements
2. Supply Chain Mapping

Supply Chain Mapping

Step 1: Identify your target pool of direct suppliers, this can be direct smallholders, farmers' groups / cooperatives, or dealers (i.e., you may not map 100% of supply).

Step 2: Get the big picture. For each of these direct suppliers, interview them to understand their supply chain and approximate the number of smallholders.

Step 3: Select a solution to collect data and map farmers.

- Select a solution that collects the right data (see '[03_ Data Collection at Farm Plot](#)').
- You can hire a service provider to do the groundwork or utilize your own staff. Either way, it is important that manpower is trained in SOPs, there will also need to be verification of data.
- Mapping effort should be well socialized in the supply chain. Smallholders should be engaged on the purpose of the exercise and understand their data protection/ownership rights and the value of their data.

Supply Chain Mapping

Tier 1			Tier 2			EUDR	
Supplier code	Type	# of suppliers	Supplier code	Type	# of suppliers	# EUDR farms	Status
001	Big Dealer	3 suppliers	001-01	Small dealer	50 farmers	50/50 farm plots	Full EUDR
			001-02	Small dealer	60 farmers	30/60 farm plots	Partial EUDR; segregation required
			001-03	Farmer group	100 farmers	0/100	Non-EUDR
002	Small Dealer	50 farmers				50/50	Full EUDR
003	Farmer group	150 farmers				50/150	Partial EUDR; segregate
004	Big Dealer	2 suppliers	004-01	Small dealer	10 farmers	7/10 farm plot	Partial EUDR; segregate
			004-02	Small dealer	50 farmers	50/50 farm plot	Full EUDR

Content

Summary

1. Basic Requirements
2. Supply Chain Mapping
3. Farm Level Data Collection

Farm Level Data Collection

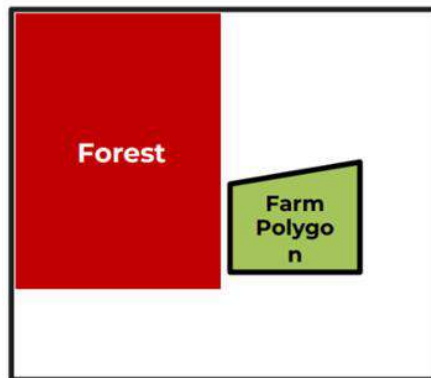
Article 9 elaboration

Requirement	Data required	Methodology
1. Geolocation of all plots of land [Article 9(1), (d)]/[Annex II (3)]	Boundary shapefiles*. Should be consolidated in .geojson format. *note that single GPS point is allowed under the law for plots of land less than 4ha, but the recommendation is for full boundary data for all plots	Dedicated geomapping tools (applications) are recommended. Otherwise, processors will need to carefully organize geographical data in dedicated software/databases.
2. Plots of land are deforestation-free [Article 3 (a)]	Satellite analysis for each plot demonstrating that land was developed prior to 31 December 2020 *it is preferable to also align with the GPSNR cut-off date of 1 April 2019	Dedicated satellite analysis providers are recommended. Supplement with open-source data as needed: GFW, EU observatory. Also refer to slides: 'Identification of EUDR compliant farms: Deforestation-free'
3a. Conducted in accordance with legislation: Land use rights [Article 3 (b)]	Collect data/documentation from farmers that demonstrate a right to use the land.	Data collection at farm level for land documentation. Supplement with analysis to show plots are not overlapping with restricted-use / illegal areas (e.g., protected areas)

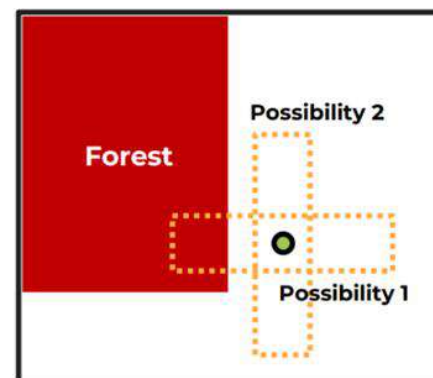
Farm Level Data Collection

Why boundary/polygons are preferred

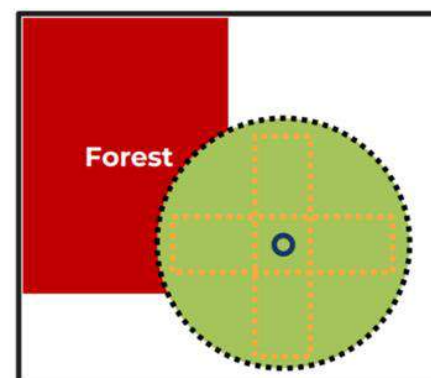
1. Polygons are the best way to determine the size of the farm plot (i.e., if you only have one GPS point, how do you prove the farm is really below 4ha?). They are also the best way to establish that a plot is totally deforestation and degradation-free.
2. Polygons will result in less analysis and cost for analysis on deforestation and protected area risk. It also reduces the instances of 'false positives', as the buffer may show overlap with forest when the real farm does not. See below visualization.



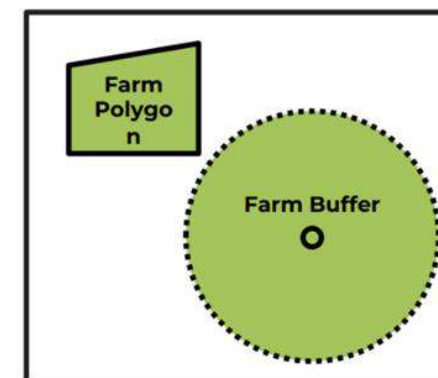
With a polygon, the 3ha farm plot is clearly outside of the forest.



For single point GPS, we must take into account all possibilities, including 'long length farms'



This means we need a buffer around the single GPS that takes into account these extremes. There is also risk of false positives.

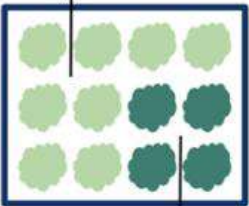


We need a much larger area for a farm buffer vs. a real polygon. This means higher costs for analysis.

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4. Identifying EUDR compliant farms

Identifying Compliant Farms

Scenario	Description	Compliance means	How to check
1. 100% Agriculture  Check once that plot was planted before cut-off date	Plot is 100% planted by rubber trees (or otherwise developed). No natural forest remains. Note: Common to many smallholder farms in SE Asia.	Proof that the entire plot was 100% developed before the cut-off date.	Satellite providers can either: - Identify the actual land cover: e.g., identify that a plot is 100% covered by rubber as of the cut-off date - Identify the first instance of forest lost and indicate that this happened on 100% of the plot before the cut-off date.
2. Mixed Check that rubber was planted before cut-off date (once)  Natural forest area requires continuous monitoring (deforestation alerts)	Plot is mixed, with some area planted by rubber (or otherwise developed), and some area covered with natural forest. Note: Common in large industrial plantations and in some countries like Brazil	(2.1) Proof that the land used for agriculture was developed before the cut-off date. (as in scenario 1) (2.2) Continued regular monitoring of natural forest area to ensure no deforestation.	For 2.1, refer to steps set out in scenario 1 For 2.2, The area within the plot covered by natural forests should be regularly monitored for new deforestation. Many satellite providers and solutions provide 'deforestation alerts'. There is no need to monitor the agricultural area.

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1. Basic Requirements
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5. Segregation

Segregation (Village Dealer)

At Farmer-facing Dealer

Segregate raw materials based on given list

Transaction recording (EUDR compliant bin):

- Farmer ID / Name
- Weight (Volume)
- Date



During storage and transport

Segregation between EUDR compliant and non-compliant raw materials, with clear labels

- Cup lumps: Physical barrier / 1m gap
- Latex: Designated tanks / barrels

Smallholders

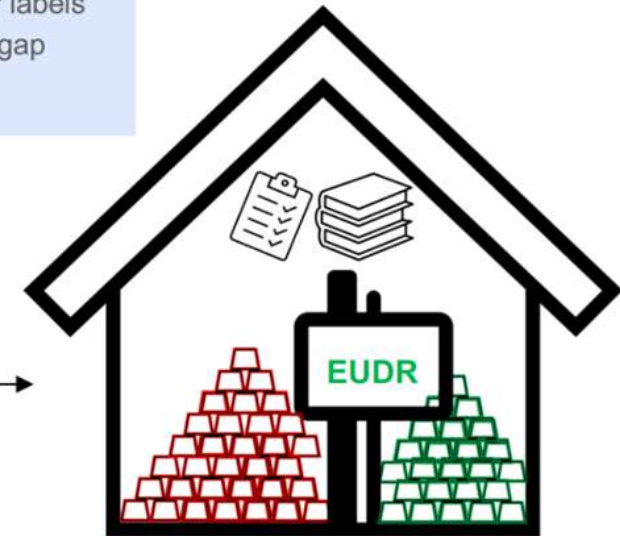


If latex:



Farmer-facing Dealer
(village dealer)

Transportation



nth Dealer

Mixing should not
be allowed during
transportation

DRAFT ONLY, Do not distribute beyond GPSNR

Segregation (Processing Factories)

Stage	Goal	Check	Practical guidance (details)
Raw material reception	EUDR compliant status of raw material are identified at reception.	There is a clear process to identify whether incoming transports are EUDR compliant Staff are clearly aware of the process	1. Manage by supplier management system (if some suppliers are clearly designated 100% EUDR) 2. Require that suppliers clearly mark EUDR compliant raw material shipments 3. Record of receipts of EUDR material should be clearly differentiated in the raw material receiving section.
Raw material storage warehouse	EUDR compliant raw material are clearly segregated and demarcated.	EUDR raw material is segregated by physical barriers (bins). If no barrier, material should be at least 1m apart from other piles. Clear signage and demarcation. Either (1) Designated locations (whole warehouse or enclosures) with permanent signage, or (2) clearly labelled temporary signage for designated bins.	Signage or labels should clearly state 'EUDR'. Clearest method would be to dedicate permanent enclosures or warehouses to EUDR (so there is no risk of mixing).
Wet process	There is no mixing of EUDR and non-EUDR in the process (no contamination). Batch processing follows clear guidelines.	Option 1 Dedicated line(s) for EUDR rubber: The line is used purely for EUDR Rubber There is a strong line clearance process in between process of Checks on timings (start, stop, checks), documentation from supervisors that clearance checks were done (already part of ISO 9001/IATF requirements every time there is a product changeover there needs to be a release)	
Dryer/packing	There is no mixing of EUDR and non-EUDR in the process (no contamination). Batch processing follows clear guidelines.	Changeover (for trolley): if there is a clear demarcation. Trolleys are clear of material for changeover Timing for line clearance (as indicated in supervisor records)	
Storage	No mixing occurs during storage. EUDR material is clearly segregated.	Clear areas or signposts. Staff can accurately identify specific areas allocated for EUDR material. All material in EUDR marked zones are indeed EUDR.	Examples of marked areas: cones with white tape, painted markings on floor, permanent signage with 'EUDR' label, clear removable signage with 'EUDR'.

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5. Segregation
6. Land Tenure and Legal Compliance



Thank you