Smallholders and the European Union Deforestation Regulation

Challenges, implications, and pathways to compliance

SSI REPORT

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IISD International Institute for Sustainable Development

SSI State of Sustainability Initiatives

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August 2026

Written by Rupal Verma, Florencia Sarmiento, and Erika Luna

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Executive Summary

The European Union's Regulation on Deforestation-free products (EUDR) is reshaping global agricultural supply chains by requiring operators to demonstrate that commodities placed on and exported from the European Union (EU) market are deforestation-free and legally produced. Although the regulation does not directly regulate most producers, its due diligence requirements are increasingly transmitted upstream through supply chains, creating new expectations for millions of producers, particularly smallholders. Because smallholders account for a substantial share of the production of several EUDR-covered commodities while often facing the greatest barriers to demonstrating compliance, their successful inclusion in deforestation-free supply chains will be critical to both the effectiveness of the regulation and its ability to support equitable market access.

Drawing on a survey of 333 smallholder farmers and farmers' organizations across 16 countries in Africa, Asia, and Latin America, as well as a review of existing literature, this paper examines how smallholders perceive the EUDR, the challenges they face in meeting its requirements, and the support they need to ensure their continued participation in global markets. The findings reveal a gap between awareness of the regulation and readiness to meet buyer requirements associated with EUDR compliance. We found that 91% of respondents had heard of the EUDR, and 86% reported receiving some form of guidance or training, though these high levels of awareness likely reflect the characteristics of the survey sample, which included farmers and farmer organizations already engaged in sustainability initiatives and international value chains. Even within this relatively well-connected group, major readiness gaps remained. Only 31% reported having clear land ownership documentation, while compliance costs, limited technical capacity, traceability requirements, and access to geolocation data were identified as key barriers to meeting the regulation's requirements.

The survey also reveals a growing divide between producers already connected to organized supply chains and those operating independently. Producers participating in voluntary sustainability standards and sustainability initiatives generally reported stronger documentation systems, greater access to traceability tools, and higher levels of institutional support than producers operating outside these initiatives. However, certification alone is not sufficient to ensure compliance, and many smallholders remain uncertain about how existing sustainability standards and initiatives relate to EUDR requirements. A further concern that emerged is the risk of market exclusion and leakage. About three-quarters of respondents believed that stricter compliance requirements could push producers toward less regulated markets. This finding highlights a critical challenge for policy-makers and supply chain actors: ensuring that the EUDR reduces deforestation without excluding the smallholders who play a vital role in global agricultural production.

The report argues that achieving the objectives of the EUDR will require a shared-responsibility approach involving governments, private sector actors, voluntary sustainability standards organizations and sustainability initiatives, and development partners. Supporting smallholder inclusion is not only a matter of equity, but also fundamental to the effectiveness and credibility of the regulation itself.

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Acronyms and Abbreviations

EU	European Union
EUDR	European Union Deforestation Regulation
IISD	International Institute for Sustainable Development
NGO	non-governmental organization
RSPO	Roundtable on Sustainable Palm Oil
VSS	voluntary sustainability standard
VSSO	voluntary sustainability standard organization

1.0 Setting the Scene

1.1 Smallholder Farmers in a Changing Regulatory Landscape

Smallholders are small-scale farmers who typically manage up to 10 hectares of land and are central to global food systems (Food and Agriculture Organization of the United Nations, 2013). While there is no universally agreed-upon definition of who counts as a smallholder, the scale of this farming population is striking. Of more than 570 million farms worldwide, at least 475 million are smaller than 2 hectares (Lowder et al., 2016), a threshold that is commonly used in global analyses as a practical point of reference for smallholder farming (Ritchie, 2021).

Regardless of where the definitional line is drawn, the collective contribution of smallholders to feeding the world is substantial. An estimated 600 million smallholder farmers produce 20% to 31% of global crops and 30% to 34% of the world's food supply (Ricciardi et al., 2018; Shroff, 2022). Despite their critical role, smallholders remain highly vulnerable to environmental, social, and economic pressures that threaten their productivity and livelihoods (Touch et al., 2024).

At the same time, sustainability-related regulations are becoming increasingly important drivers of market access. Governments and markets are introducing new requirements related to due diligence, traceability, sustainability reporting, and responsible sourcing in an effort to address environmental and social risks in global supply chains. While these initiatives seek to improve transparency and accountability, they can also create new compliance challenges for producers, particularly smallholders operating with limited resources.

One of the most significant of these initiatives is the European Union Deforestation Regulation (EUDR),[1] adopted by the European Union (EU) in 2023. The regulation seeks to ensure that products placed on and exported from the EU market do not contribute to deforestation or forest degradation and are produced in accordance with the laws of the country of production (European Commission, 2023b). It applies to seven commodities: cattle, cocoa, coffee, palm oil, natural rubber, soy, and wood, as well as their derived products.

Smallholders play a central role in the production of several commodities covered by the EUDR. For instance, estimates suggest that smallholders produce around 70% of the world's cocoa, almost 95% of coffee is grown on farms smaller than 5 hectares, and around half of global oil palm plantations are managed by smallholders (Panhuysen & Pierrot, 2020; Qaim et al., 2020; Wessel & Quist-Wessel, 2015). The European Union is a major importer of these commodities and introduced the EUDR because EU consumption contributes to global deforestation associated with their production. Consequently, the regulation's effectiveness will depend not only on the compliance of large companies but also on the ability of millions

[1] Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010.

of smallholders participating in these supply chains to meet the EUDR's due diligence and traceability requirements.

1.2 How EUDR Compliance Expectations Affect Smallholder Farmers

Formally, the EUDR does not apply directly to smallholders. It regulates operators, who place relevant products on the EU market or export them for the first time, and traders, who make those products available on the market further down the chain. However, because both operators and traders must demonstrate, at their respective stages, that the commodities they source are deforestation-free and legally produced, these requirements are effectively passed down the supply chain to other actors, including smallholders.

In practice, these due diligence obligations are transmitted upstream through supply chains. Companies sourcing EUDR-regulated commodities are therefore likely to request information and documentation from their suppliers, including smallholders, to fulfill their own EUDR obligations (European Commission, 2023b). As a result, even though most smallholders are not directly subject to the EUDR, they may need to meet buyer requirements to maintain access to EU markets. For example, smallholders may need to

- demonstrate that production does not occur on land subject to deforestation or forest degradation after December 31, 2020, which means usually sharing geolocation of plot of land of production;
- comply with relevant national laws, including those related to land-use rights, environmental protection, and labour rights;
- provide geolocation information for production plots;
- provide available documentation and information needed to demonstrate compliance with applicable national laws and deforestation-free production; and
- share information with buyers to support due diligence obligations.

For many producers, these requirements represent a significant shift in how agricultural products are documented, traced, and verified. Meeting these requirements may require new technical capacities, improved record-keeping systems, and greater access to digital tools, finance, and extension services. In many cases, producer organizations and cooperatives play a pivotal role in translating EUDR-related buyer requirements into farm-level implementation. They often coordinate geolocation mapping, farmer registration, documentation, training, data management, and engagement with buyers, serving as the primary interface between smallholders and downstream operators.

The regulation also recognizes that compliance requires collaboration throughout the supply chain. Its risk assessment criteria require operators to consult in good faith with Indigenous Peoples and local communities where relevant to the area of production (Article 10(2)(d)). Smallholders who are themselves Indigenous producers or members of local communities may therefore be directly involved in the consultations that operators are required to undertake as part of their due diligence.

Further, Article 11(1) explicitly provides that risk mitigation measures "may also include supporting compliance with this regulation by that operator's suppliers, in particular smallholders, through capacity building and investments." While this statement does not create a legal obligation to provide such support, it explicitly recognizes capacity building and investment in suppliers as potential risk mitigation measures.

This is particularly important because it shifts the focus from viewing smallholders solely as providers of compliance information to recognizing them as partners whose ability to meet EUDR requirements depends on targeted support. In practice, this may include investments in farm mapping, traceability systems, training, geolocation data collection, and strengthening producer organizations, all of which can improve both compliance outcomes and the long-term resilience of supply chains.

1.3 Opportunities and Risks for Smallholders

The EUDR presents both opportunities and risks for smallholder producers. For example, greater emphasis on traceability and sustainability may create opportunities for improved market access, stronger producer organizations, and increased investment in sustainable production systems. The regulation may also strengthen recognition of legitimate land tenure by requiring operators to verify compliance with applicable land-use and land tenure laws in the country of production. In addition, its provisions on substantiated concerns provide a mechanism through which stakeholders can raise credible information about potential non-compliance, including where land rights may be at risk.

Some producer countries are already moving to capture these opportunities. The European Commission's May 2026 simplification review highlights, for example, Brazil's Selo Verde farm registry and environmental data platform and Thailand's EUDR traceability platform, both designed to help producers demonstrate compliance and maintain access to EU markets (European Commission, 2026). Enhanced transparency may also strengthen producers' position within supply chains and support efforts to secure fairer and more stable trading relationships (European Commission, 2023a; Zero Deforestation Hub, 2024).

Despite these potential benefits, without adequate support, smallholders face a high risk of exclusion from the EU market. Smallholders often lack the financial resources, data, and legal recognition that are needed to demonstrate compliance (Melati et al., 2024; RECOFTC, 2025). In addition, many of these producers are already grappling with the impacts of climate change and land tenure uncertainty (Enssle, 2025; Touch et al., 2024), which further impede their ability to meet the EUDR requirements. Without adequate support, the implications of the EUDR for smallholder market access are likely to vary across commodities and supply chains. In some sectors, implementation may create risks of exclusion from existing EU-oriented supply chains, while in others it may constrain opportunities for future inclusion where smallholders are not yet well integrated into those markets.

Recognizing challenges associated with the EUDR implementation, including the EUDR Information System, the digital platform used to submit due diligence statements and associated compliance information, the European Union amended the EUDR in December 2025, extending its application date to December 30, 2026, for large and medium-sized operators and to June 30, 2027, for micro and small enterprises, providing additional time for preparation (European Commission, 2025).

In its mandated simplification review, published in May 2026, the European Commission concluded that the measures introduced in 2024 and 2025, together with the December 2025 amendment, substantially reduce the regulation's administrative burden. Some of these measures may also benefit smallholders, either directly where they qualify as operators or indirectly through the organizations that market their products. For example, operators that qualify as micro or small enterprises are now subject to a simplified regime, submitting a one-time simplified declaration rather than a full due diligence statement, and may use a postal address or cadastral reference instead of full geolocation coordinates. Cooperatives and producer associations may also submit declarations on behalf of their members as authorized representatives (European Commission, 2026).

However, the micro or small primary operator category applies only to producers that export directly to the European Union, representing only a small proportion of smallholders. Most smallholders continue to sell through cooperatives, traders, or other intermediaries, and therefore remain subject to buyer requirements passed through the supply chain, rather than becoming operators under the EUDR themselves.

Against this background and given smallholders' significant contribution to the production of the key commodities covered by the regulation, it is crucial to understand their needs in order to ensure their inclusion in and continued access to the EU market. The central question is therefore not whether smallholders are aware of the EUDR, but whether they are equipped to comply with it. The following section draws insights from the responses of smallholder farmers surveyed for this report and summarizes the key findings.

2.0 Insights from Smallholder Farmers

This section draws on survey responses and interviews with 333 smallholder farmers and farmer groups across 16 countries in Asia, Africa, and Latin America, conducted by the International Institute for Sustainable Development (IISD) in collaboration with partners in 2025. Respondents were producers of five EUDR-relevant commodities: palm oil (n=49), soy (n=231), coffee (n=24), cocoa (n=19), and rubber (n=2), together with mixed-crop farmers who produce more than one EUDR-relevant commodity (n=8).[2] Figure 1 shows the geographic coverage of the study, which included participants in West Africa (Benin, Togo, Ghana, Côte d'Ivoire, and Sierra Leone), East Africa (Kenya, Rwanda, Ethiopia, and Uganda), Southeast Asia (Indonesia, Thailand, and Malaysia), and Latin America (Colombia, Honduras, Peru, and Ecuador). An overview of the survey and interview questions is provided in Appendix A.

Figure 1. Geographic coverage of smallholder surveys and interviews

Source: Authors.

While this report identifies common patterns across the survey sample, smallholder experiences are not uniform. Compliance challenges and opportunities vary considerably depending on the commodity produced, the country context, the strength of producer organizations, and producers' integration into international value chains. The findings presented below should therefore be interpreted as crosscutting trends rather than representative of all smallholder contexts.

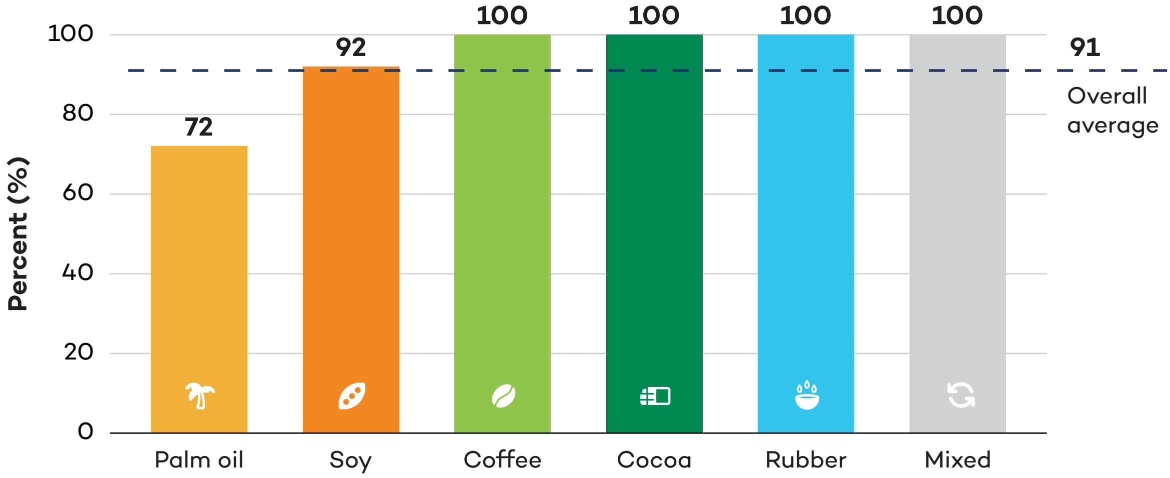
[2] The survey sample was not designed to be statistically representative across commodities or regions. Respondents were identified through partner networks and targeted outreach, resulting in an uneven distribution across commodity groups, with soy producers comprising the majority of respondents. Consequently, the findings should be interpreted as indicative of the experiences captured through this study rather than representative of all smallholders producing EUDR-relevant commodities. Where relevant, commodity-specific findings are presented separately.

2.1 Key Findings

Knowledge and Awareness: High awareness, limited readiness to comply

Overall awareness of the EUDR was high, with 91% of respondents reporting that they had heard of the regulation (Figure 2). Awareness was highest among soy, coffee, cocoa, rubber, and mixed-crop producers. Palm oil farmers reported lower awareness (72%), and all surveyed producers in this sector anticipated challenges in meeting the regulation's requirements.

Figure 2. Share of respondents aware of EUDR, by commodity



Notes: The percentage is the proportion of respondents who answered "Yes" when asked if they were aware of the EUDR.

Source: IISD smallholder survey, 2025.

The findings suggest that awareness-raising efforts have achieved considerable reach. However, awareness alone does not necessarily translate into readiness to provide information needed for EUDR compliance. Survey responses revealed varying levels of understanding of what compliance actually entails. While many respondents demonstrated an understanding of key concepts such as traceability, geolocation, and deforestation-free production, others continued to think of the EUDR as one more voluntary sustainability certification scheme, indicating that important knowledge gaps remain regarding the regulation's legal requirements. This indicates that while awareness of the regulation was high, the understanding of its practical implications and readiness to respond to buyer requirements remained much more uneven.

The results also reveal that awareness is closely linked to producers' integration into organized supply chains. Cooperatives, certification systems, non-governmental organizations (NGOs), government agencies, and buyers all served as important channels for disseminating information. Farmers connected to these institutional networks generally demonstrated a stronger understanding of the regulation than those operating independently.

"The cooperative explained the EUDR regulations to us clearly and taught us how to deal with them."

Fairtrade-affiliated coffee cooperative, Uganda

Information pathways also varied across regions. In West Africa, for example, NGOs (like Solidaridad) and government agricultural ministries were the primary channels. In Southeast Asia, cooperatives, raw material purchasing companies, and social media played more prominent roles. The fragmentation of information pathways underscores the need for systematic, multi-channel outreach strategies tailored to local contexts.

Notably, although awareness among surveyed palm oil producers was lower than it was for producers of other commodities, every palm oil–farming respondent anticipated difficulties in complying with the regulation. This finding suggests that concerns about compliance may extend beyond detailed prior knowledge of the regulation itself and reflect broader uncertainty regarding evolving buyer expectations, documentation requirements, and future market access.

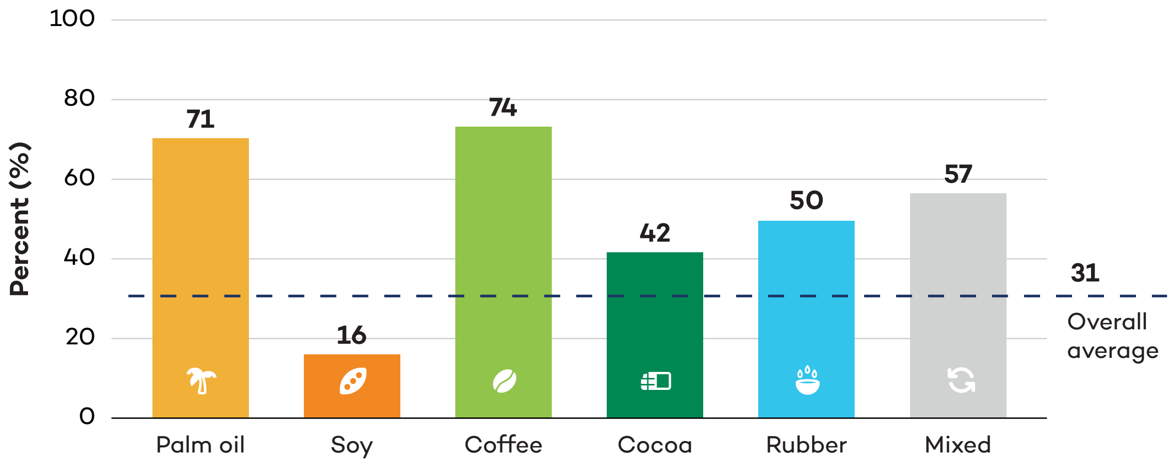
Overall, the findings suggest that the primary challenge is no longer making smallholders aware of the EUDR but ensuring that they have access to the technical knowledge, institutional support, and practical tools needed to comply with it. The survey results also highlight the importance of strengthening existing farmers' organizations and local support networks, which appear to be the most effective channels for translating awareness into compliance readiness.

Land Tenure and Documentation: The most critical structural barrier

Across all respondents, land tenure emerged as the most important structural challenge to compliance. Overall, only 31% of surveyed farmers reported having clear land ownership documentation, with substantial variation across commodities (Figure 3). The challenge was particularly pronounced among soy producers, who were located predominantly in West Africa; only 16% of the 231 respondents reported possessing formal land documentation. Although this finding largely reflects the survey's concentration in West Africa, it nevertheless illustrates the scale of land tenure constraints facing many smallholders.

The survey findings suggest that land tenure challenges extend well beyond the absence of formal land titles. Rather, they reflect a range of legal, administrative, and institutional constraints that can make it difficult for smallholders to demonstrate compliance with applicable national laws, which operators must assess as part of their EUDR due diligence. In practice, smallholders may also be asked by buyers to provide additional documentation or evidence that reflects individual company due diligence approaches or risk management practices, rather than requirements explicitly set out in the regulation itself.

Figure 3. Share of respondents with clear land ownership documents, by commodity



Source: IISD smallholder survey, 2025.

The nature of land tenure challenges varied across respondents' countries. In Indonesia, overlapping government land maps between agencies, including the Cooperative Agency, Agriculture Agency, and the National Land Agency, created legal ambiguity even for farmers who considered their plots to be compliant. In Thailand, several respondents held Sor Por Kor or Por Bor Tor documents that are legally recognized under Thai law, but may not, on their own, provide sufficient evidence to comply with EUDR requirements for legality verification. In Ghana, respondents identified registration costs and administrative burdens as major obstacles to formalization.

"Farmers have cultivated their land for over 50 years, but have not been able to obtain any form of official land title."

Roundtable on Sustainable Palm Oil–certified palm oil farmer group, Thailand

Beyond land tenure itself, producer organizations face ongoing operational challenges associated with maintaining accurate farmer records, updating changes in land ownership, coordinating GPS mapping, responding to repeated information requests from buyers, governments, and certification bodies, and ensuring that data remain current over time.

Taken together, these findings suggest that strengthening land tenure is not simply a matter of issuing more land titles. It also requires improving land administration systems, reducing the cost and complexity of registration, resolving overlapping claims, and ensuring that nationally recognized land documents can effectively support compliance with international market requirements. Without progress in these areas, many smallholders may struggle to demonstrate legality regardless of whether their production practices are sustainable.

Financial Barriers: High costs, limited resources

Cost and financial barriers were the most frequently cited challenges across all commodities surveyed, mentioned by 57% to 80% of respondents, depending on the sector. These costs include certification fees, the collection and organization of information and documentation requested to support buyers' EUDR due diligence (such as geolocation data and evidence of compliance with applicable national laws), farm mapping, traceability system development, and participation in audits. For many producers, these costs are significant relative to farm income. They can represent a major barrier to market participation and can determine whether participation in EU supply chains remains economically viable. As one respondent from Ghana explained, smallholders are farming "basically for livelihood and survival, not for profits like the major industry players."

The survey findings are consistent with broader evidence that compliance costs already represent a significant burden for smallholders. Existing sustainability and traceability requirements already impose substantial costs on producers. For example, estimates suggest that Roundtable on Sustainable Palm Oil (RSPO) certification can cost between USD 2,500 and USD 5,000 per producer group, while third-party mapping services can cost an average of between USD 14 and USD 35 per hectare (de Oliveira et al., 2024; Judijanto, 2025). Recent analyses further suggest that compliance with emerging regulations such as the EUDR may require substantial investments in farm mapping, geolocation data collection, and traceability systems, with compliance costs estimated at 70 euros to 200 euros per farmer in Indonesia (Fern, 2025).

These findings suggest that, without targeted financial and technical support, EUDR compliance requirements risk creating additional barriers to market access for many smallholders. Producers with limited financial resources may struggle to make the upfront investments needed to demonstrate compliance, increasing the risk of exclusion from regulated supply chains.

At the aggregate level, however, the European Commission's May 2026 simplification review estimates that the combined effect of measures introduced since 2023 has reduced total annual EUDR compliance costs across the EU market by approximately 75%, from an estimated 8.1 billion euros to 2.0 billion euros per year (European Commission, 2026). These measures include the country risk classification exercise, annual rather than per-shipment submission of due diligence statements, and the simplified regime for micro or small primary operators.

Whether these aggregate savings reach smallholders directly, however, depends on how much of the reduced burden borne by downstream operators and traders is passed back through the supply chain in the form of lower compliance demands or fairer prices, rather than being retained further up the chain. This point highlights the importance of ensuring that the benefits of regulatory simplification are shared across supply chains and contribute to strengthening, rather than weakening, smallholder participation in EUDR-compliant markets.

Training and Technical Capacity: Bridging the readiness gap

Despite widespread awareness of the EUDR, significant disparities remain in access to training and compliance support. Overall, 86% of survey respondents reported receiving some form of EUDR guidance or training but this figure is driven largely by two soy-buying companies in Benin and Togo, which trained the vast majority of their own supplying farmers directly. Outside this group, training reached farmers through a more varied mix of certifiers, NGOs, traders and buyers, and, less frequently, government programs, suggesting that private-sector and certification actors are currently doing more of the compliance-support work than the public sector. All surveyed palm oil farmers, for instance, anticipated challenges in meeting EUDR requirements, but only 20% reported receiving EUDR-specific training or advice. In comparison, training coverage was reported at 100% for coffee producers, 95% for cocoa producers, and 96% for soy producers who responded to the survey.

This gap between anticipated compliance challenges and access to support likely reflects differences in how commodity supply chains are organized. For example, many palm oil producers, particularly in Southeast Asia and West Africa, sell through local mills, traders, or intermediaries rather than directly to exporters or certified buyers, which typically provide compliance assistance. As a result, the networks commonly used to deliver EUDR-related training, including cooperatives, certification schemes, industry platforms, and NGO partnerships, may not effectively reach a large share of independent smallholders.

Beyond awareness and training, access to the technical tools required for compliance remains a major constraint. The EUDR requires geolocation information for all production plots, including polygon mapping for plots larger than 4 hectares and geographic coordinates for smaller plots. Collecting, managing, and submitting this information can be technically demanding, particularly for farmers with limited digital literacy or access to appropriate technologies.

The survey findings illustrate these differences in preparedness. While one Ugandan cooperative had already collected geolocation data for its members, another described the same task as overwhelming due to resource and capacity constraints. These contrasting experiences demonstrate the critical role that producer organizations, extension services, and technical support programs can play in enabling compliance.

Digital infrastructure gaps further compound these challenges. According to World Bank data, only 36% of the population in Sub-Saharan Africa used the internet in 2025, while the affordability of smartphones, mobile data, and digital services remains a significant barrier to digital inclusion (World Bank, 2025). In this context, EUDR compliance strategies that rely exclusively on cloud-based platforms or continuous internet connectivity risk excluding many smallholders.

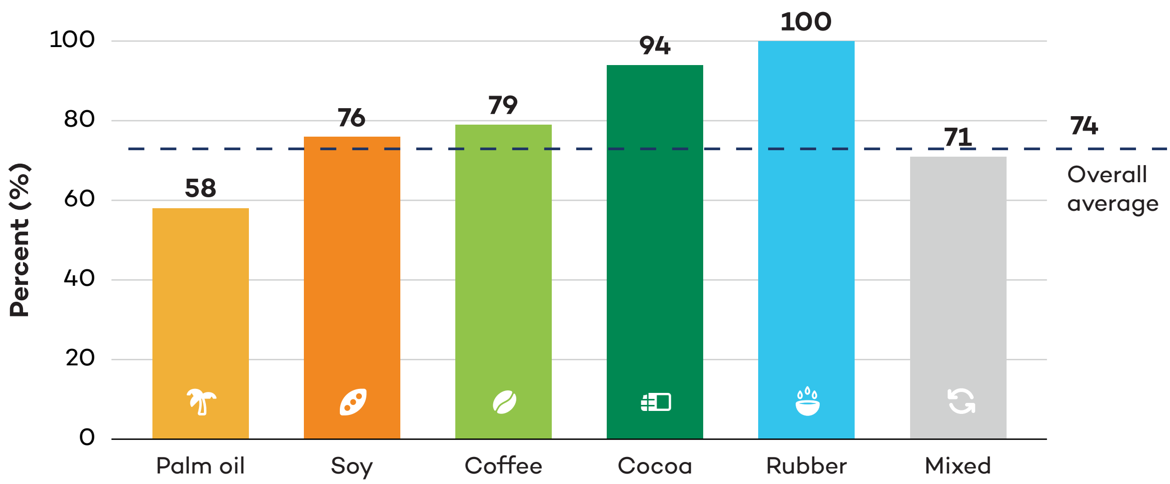
The findings suggest that effective compliance support will require more than awareness-raising initiatives. Scalable approaches are likely to depend on offline-capable data collection tools, cooperative-led implementation models, targeted technical assistance, and investments in digital infrastructure that enable smallholders to meet EUDR requirements regardless of their level of connectivity or technical capacity.

> "The coffee farmers in our cooperative have small farms in different areas, making it difficult to track them all with GPS."
> **Fairtrade-affiliated coffee cooperative coordinator, Uganda**

Market Dynamics: Leakage and the risk of exclusion

A significant majority of respondents (an overall average of 74%) anticipated that stricter EUDR rules could push farmers toward less regulated markets (Figure 4). Respondents consistently highlighted the same underlying concern: if compliance becomes too costly, complex, or inaccessible, farmers will seek alternative buyers. As one Indonesian palm oil farmer noted, "producers will sell wherever they can sustain their livelihoods." Similarly, a rubber producer in Côte d'Ivoire warned that stricter requirements could create a lower-priced secondary market for non-compliant products, reducing smallholder incomes. Survey responses point to two distinct risks of leakage to unregulated markets. The most frequently cited driver is price- and payment-related: farmers reported selling to whichever buyer offers the better price or pays faster at the time, and several noted that informal or cross-border buyers can outbid EUDR-oriented buyers, particularly when compliant channels are slow to pay. A smaller group of farmers cited a different risk: the inability to afford compliance costs at all, which could exclude them from EUDR-compliant buyers and force them into lower-value markets by default, not by choice.

Figure 4. Share of respondents who believed stricter EUDR requirements could push farmers toward less regulated markets, by commodity



Source: IISD smallholder survey, 2025.

These findings highlight a broader challenge for EUDR implementation. The regulation's effectiveness depends on maintaining incentives for sustainable production while ensuring that smallholders remain included in regulated supply chains. If producers are excluded without access to viable compliance pathways, there is a risk that production may be redirected to less regulated markets, reducing the environmental benefits of the regulation and increasing social costs for rural communities.

This result reflects a significant risk of market exclusion and leakage. The six commodities originally covered by the EUDR—cattle, cocoa, coffee, palm oil, soy, and wood—have been linked to the majority of tropical deforestation embodied in EU imports, underscoring the regulation's importance in reducing the European Union's global deforestation footprint (Gilbert, 2024).[3] However, if compliance costs and administrative requirements result in the exclusion of smallholders from regulated supply chains, production may shift to alternative markets that might have weaker sustainability requirements. Such an outcome would weaken both the environmental and social objectives of the regulation: environmental gains would be reduced if deforestation is displaced rather than prevented, while smallholders could lose access to high-value markets and important sources of income.

The findings therefore suggest that supporting smallholder inclusion is not only a matter of equity but also a prerequisite for achieving the EUDR's environmental objectives. Reducing the risk of leakage will require ensuring that producers have realistic and affordable pathways to compliance, supported by coordinated investments in finance, technical assistance, and traceability systems.

Role of Voluntary Sustainability Standards and Sustainability Initiatives: Support for compliance

The survey reveals a clear divide in readiness for EUDR compliance between smallholders who participate in voluntary sustainability standards (VSSs) and sustainability initiatives and those who do not. Overall, 59% of respondents reported participating in at least one sustainability initiative, including certification schemes such as RSPO, Round Table on Responsible Soy, Rainforest Alliance, Fairtrade, ProTerra, and Forest Stewardship Council, as well as the Global Platform for Sustainable Natural Rubber,[4] a membership-based sustainability platform.

Producers that participate in these sustainability initiatives generally reported higher levels of awareness, stronger documentation practices, and greater access to traceability systems, training, and compliance support than their non-certified counterparts. Among RSPO-certified palm oil cooperatives in Indonesia, for example, farmers were already participating in traceability systems and maintaining farm-level records, providing a stronger foundation for supplying the information and evidence needed to support operators' EUDR due diligence even where additional steps are still required to achieve full compliance. More broadly, VSSs and sustainability initiatives often serve as important channels through which producers access

[3] These six commodities reflect the set assessed in the Commission's original pre-adoption impact assessment; rubber was added to the regulation's scope based on further analysis showing it also contributes meaningfully to European Union–driven deforestation, resulting in the seven commodities covered by the EUDR.

[4] This organization establishes policy requirements and implementation guidance for its members but does not operate a producer certification scheme. References to sustainability initiatives in this report therefore include both certification schemes and membership-based platforms where relevant.

information, technical assistance, buyer programs, and producer organizations that support compliance readiness.

At the same time, the survey suggests that many producers remain uncertain about how existing VSSs and sustainability initiatives relate to EUDR requirements. Several respondents viewed certification as a valuable starting point but were unsure about additional steps required to demonstrate compliance. This observation points less to the limitations of certification itself than to a need for greater clarity regarding the relationship between VSSs and regulatory requirements.

> "[Sustainability initiatives] help lay a strong foundation for compliance with the EUDR as [they] share many similar systems, particularly in areas such as traceability, land management, and risk assessment. However, the EUDR also has some specific requirements, such as the identification of each plot's geographic coordinates, which may need to be added to what is already in place."
>
> **Rubber producer, Thailand**

This distinction is also reflected in the EUDR. The regulation recognizes that certification and other third-party-verified schemes may support operators' risk assessment and risk mitigation processes, while making it clear that these schemes do not replace operators' due diligence obligations. The European Commission is establishing a repository of certification and third-party verification schemes applicable to EUDR-relevant commodities to facilitate access to information that may support operators' due diligence processes. The repository is intended as an information tool and does not constitute official recognition of schemes or alter operators' responsibility to comply with the EUDR (European Commission, 2026).

Recent analysis also suggests that many VSSs already provide a strong foundation for EUDR compliance, particularly in areas such as traceability, risk assessment, governance, and producer support (Verma et al., 2025). By contrast, non-certified smallholders or those not linked to any sustainability initiative might face a much steeper path to compliance. Many such producers lack access to the cooperatives, certification schemes, buyer programs, and extension services through which information, training, and technical support are delivered. As a result, they are less likely to benefit from the systems, resources, and institutional support needed to meet EUDR requirements. The findings point to the risk of creating a two-tier system, in which producers who are already integrated into organized supply chains may be better positioned to comply, while independent and non-certified smallholders might fall further behind.

Taken together, these findings suggest that certification can serve as an important entry point for compliance readiness by strengthening producer organization, traceability, and record-keeping systems. However, the effectiveness of a given certification depends on the degree of alignment between its requirements and EUDR obligations. Strengthening this alignment, while expanding support to non-certified producers, could help reduce compliance costs, improve preparedness, and ensure that smallholders are not excluded from EUDR-compliant supply chains.

Box 1. EUDR and gender

The survey indicates that women smallholder farmers are most concentrated in coffee production, where they account for a third of respondents, the highest share of women farmers among the commodities included in the survey. Women also report higher participation in sustainability initiatives: 68% have participated in certification schemes, compared with 51% of men. This difference persists even outside the coffee sector, where 60% of women report certification experience compared with 48% of men. These findings are consistent with research on certified coffee value chains, which highlights the significant role of women in coffee production and the reliance of certified systems on family labour, with women often contributing a substantial share of that labour (International Coffee Organization, 2018). At the same time, research suggests that the implementation of the EUDR could have mixed implications for women in smallholder communities. Depending on how the regulation is implemented, it could either reinforce existing inequalities, particularly where women face insecure land tenure, limited access to documentation, and lower digital literacy, or create opportunities to strengthen women's participation in sustainable and deforestation-free value chains. These findings underscore the importance of gender-responsive due diligence approaches and investments in women's digital and technical capacities (Linden et al., 2025).

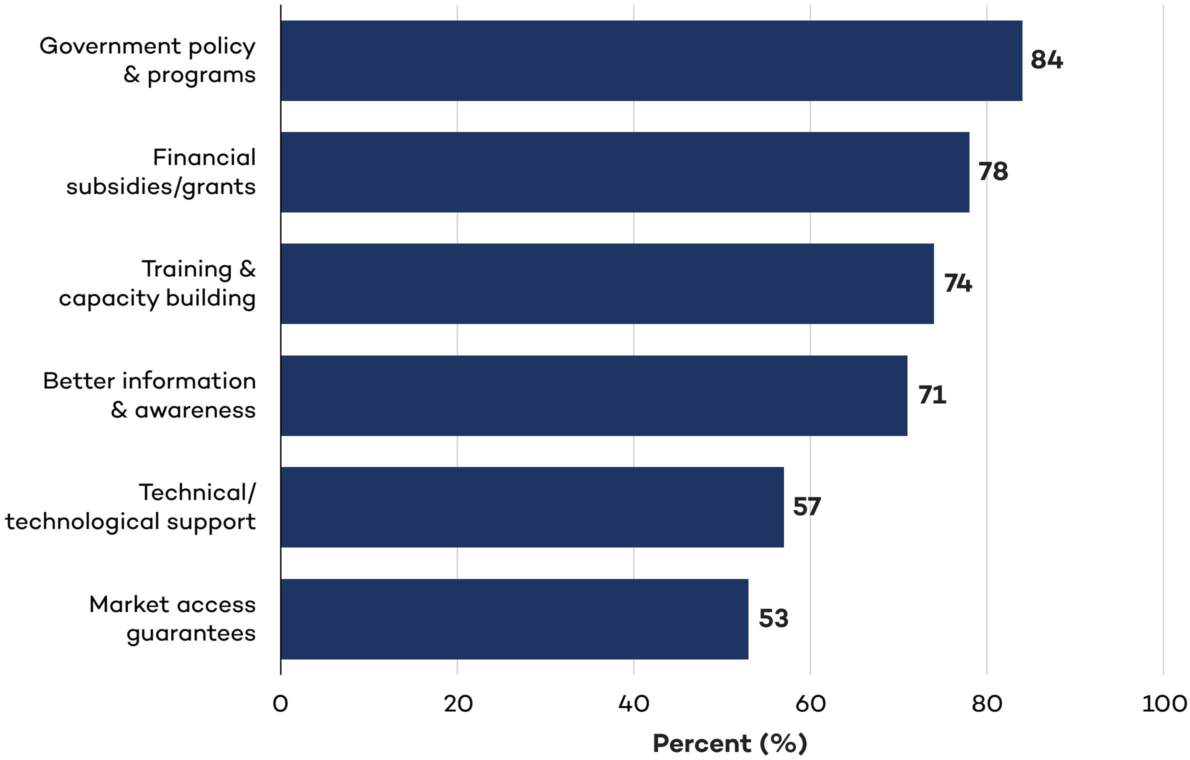
The survey points to a practical entry point for such efforts. Women respondents report levels of EUDR awareness comparable to or slightly higher than those of men (97% versus 93%) and have greater experience with certification schemes, suggesting a strong foundation for engagement with EUDR requirements. However, they continue to face challenges related to land documentation. Building on existing certification experience, targeted training and support for women could help translate existing knowledge and networks into EUDR compliance capacity while reducing the risk of exclusion from sustainable agricultural supply chains.

2.2 Needs and Support Mechanisms for Smallholders

Across all commodities, respondents identified three priority areas for support: government policies and programs (84%), financial assistance (78%), and training and capacity building (74%; Figure 5). These findings reinforce a key message that emerged throughout the survey: while awareness of the EUDR is relatively high, many smallholders lack the enabling conditions needed to comply.

The results suggest that EUDR compliance is not solely a technical or knowledge-based challenge. Although training remains important, smallholders also face broader structural barriers related to land tenure, access to finance, traceability systems, and compliance costs. The prominence of government support and financial assistance among respondents' priorities indicates that many of the obstacles to compliance lie beyond the farm level and require coordinated action across public institutions, supply chain actors, and support organizations. Ensuring that smallholders can access the resources, infrastructure, and support services needed to meet EUDR requirements is therefore critical to their continued participation in EUDR-regulated markets.

Figure 5. Needs identified by surveyed smallholders to comply with the EUDR



Source: IISD smallholder survey, 2025.

3.0 Recommendations

The survey findings indicate that the barriers facing smallholders extend beyond the farm level. While farmers identified training and technical support as important needs, they also highlighted broader structural constraints related to land tenure, traceability systems, access to finance, and market organization. Addressing these challenges requires coordinated action by the actors positioned to influence them. The recommendations below therefore focus on three complementary pathways for supporting smallholder inclusion in EUDR-oriented supply chains: (a) voluntary sustainability standard organizations (VSSOs), which can strengthen producer systems and deliver technical support; (b) governments, which can improve the enabling environment through policies, infrastructure, and public investment; and (c) private sector actors, which can support suppliers as part of their due diligence and sourcing practices.

3.1 Pathway 1: Strengthening producer support through VSSOs

VSSOs can play an important role in helping smallholders prepare for EUDR compliance. Survey findings suggest that existing VSSOs can provide a useful foundation through traceability systems, farm records, and producer organization structures, but they may not fully address all EUDR requirements, particularly those related to legality and geolocation.

This role is explicitly recognized under the EUDR. The regulation provides that certification and other third-party-verified schemes may be taken into account as supporting information during operators' risk assessment, but is clear that they cannot substitute for due diligence.

To strengthen their contribution to helping smallholders achieve compliance, VSSOs could pursue the following strategies:

- **Strengthen alignment with regulatory requirements.** VSSOs should systematically map their requirements against EUDR obligations and identify where existing certification systems can support compliance with geolocation, traceability, legality, and deforestation-free sourcing requirements. Clear guidance should be provided to producers and buyers on which compliance elements are already covered and where additional actions are needed.
- **Leverage certification systems to generate compliance data.** Existing certification systems already collect information on producers, farm practices, audits, and supply chains. VSSOs can help reduce duplication by integrating geolocation, traceability, and risk assessment data into existing assurance systems, making compliance more efficient for both producers and buyers.
- **Use certification systems as delivery channels for support.** The survey highlights the importance of training, information, and technical assistance for smallholders. Certification programs are often well-positioned to deliver these services through established networks of producer groups, cooperatives, auditors, and local partners.

- **Facilitate access to technology and compliance tools.** Farmers identified technical and technology support as a major need. VSSOs can support the development and dissemination of practical tools for farm mapping, traceability, record-keeping, and risk assessment, particularly for producers that operate in low-connectivity environments.

While certification alone cannot guarantee EUDR compliance, the survey findings suggest that VSSOs can serve as important platforms to build the systems, capacities, and market linkages needed to support smallholder inclusion in regulated supply chains.

3.2 Pathway 2: Building an enabling policy environment

Including smallholders in EUDR-compliant supply chains will require coordinated action from both producer-country governments and policy-makers in the European Union. Respondents identified government policies and programs as their highest-priority support need (84%). Many of the barriers highlighted in this report, including insecure land tenure, fragmented traceability systems, limited access to digital infrastructure, and insufficient technical support, are structural challenges that pre-date the EUDR, but cannot be addressed by producers alone. Addressing these constraints will require public investment, enabling policies, and coordinated support across the supply chain.

Governments in producer countries, together with EU institutions, therefore have a critical role in creating an enabling environment for smallholder participation in EUDR-oriented supply chains.

To support smallholder inclusion, policy-makers could pursue the following strategies:

- **Strengthen the enabling environment for compliance.** Producer-country governments can improve access to land registration, extension services, farmer organization support, and digital infrastructure, all of which underpin compliance readiness.
- **Invest in shared traceability and data systems.** National or sector-wide traceability platforms, geolocation databases, and data management systems can reduce duplication, lower compliance costs, and improve access for smallholders who may otherwise struggle to meet EUDR requirements independently. Existing initiatives such as Brazil's Selo Verde and Thailand's national EUDR traceability platform demonstrate how public infrastructure can support producers while improving supply chain transparency.
- **Provide targeted financial and technical support.** Mapping, geolocation data collection, certification, and traceability systems can be costly for smallholders. Grants, subsidies, concessional finance, and technical assistance programs can help ensure that compliance costs do not become a barrier to market access. The government should also make available and accessible the coordinate data relating to forest and country boundaries for the period 2019-2020 in order to facilitate initial analyses at the organizational level.
- **Promote coherence and interoperability.** Greater alignment between national sustainability initiatives, VSSs, and EUDR requirements can reduce administrative burdens and help producers leverage existing systems and investments.

- **Monitor and address smallholder exclusion risks.** The European Union and producer-country governments should assess the impacts of EUDR implementation on smallholders, including supplier deselection and market diversion, and adapt support measures where necessary to ensure that environmental objectives are achieved without disproportionate social costs.
- **Strengthen producer representation.** Include producer organizations in national EUDR taskforces and implementation platforms so that implementation approaches are informed by operational experience and local realities.

Ultimately, EUDR compliance should be viewed not only as a market access challenge but also as an opportunity to strengthen agricultural governance, traceability systems, and producer support services and promote transitions to more sustainable agrifood systems. Governments that invest in these enabling conditions will be able to support their producers to be better positioned to maintain access to sustainability-conscious markets while supporting the long-term resilience of their agricultural sectors.

3.3 Pathway 3: Strengthening responsible supply chains through private sector actors

Private sector actors, including operators, traders, cooperatives, exporters, and buyers, have a central role in ensuring that EUDR implementation does not lead to the exclusion of smallholders. The survey demonstrates that producers connected to organized supply chains generally benefit from stronger access to information, traceability systems, technical assistance, and compliance support than independent producers. In practice, the commitment of purchasing organizations is often a determining factor in whether smallholders are able to remain in EUDR-compliant supply chains. By proactively engaging suppliers, organizing compliance efforts locally, and providing a clear pathway toward continued market access, purchasing organizations can significantly reduce the risk of excluding smallholders.

Importantly, Article 11 of the EUDR explicitly recognizes supplier support as a component of risk mitigation, providing a clear basis for operators to invest in smallholder compliance through capacity building and financial support. Implementing this provision effectively provides an opportunity to strengthen both compliance outcomes and long-term supply chain resilience.

Private sector actors could therefore

- **share compliance costs more equitably.** Avoid transferring the costs of mapping, traceability, data management, and verification entirely to producers or producer organizations, and instead develop cost-sharing approaches that reflect shared responsibilities across the supply chain.
- **provide predictable technical support.** Offer ongoing guidance, technical assistance, and realistic implementation timelines that enable suppliers to progressively strengthen their systems.

- **maintain sourcing relationships during transition.** Where suppliers demonstrate commitment to improving systems, prioritize long-term engagement and capacity building over supplier replacement to reduce the risk of excluding smallholders from regulated markets.
- **coordinate information requests.** Wherever possible, harmonize data requirements across buyers and due diligence initiatives to reduce duplication and the cumulative compliance burden faced by producer organizations.
- **implement Article 11 through long-term supplier partnerships.** Invest in farm mapping, geolocation, traceability systems, digital tools, and producer capacity rather than relying solely on supplier screening.
- **recognize producer organizations as implementation partners.** Work closely with cooperatives and producer organizations, which frequently manage mapping, documentation, farmer registration, data verification, and buyer engagement on behalf of their members.

Supporting suppliers should be viewed not only as a compliance strategy, but also as a long-term investment in resilient and sustainable supply chains.

4.0 Conclusion

The EUDR represents a significant shift in the governance of global agricultural supply chains, moving sustainability expectations beyond voluntary commitments toward mandatory due diligence and traceability requirements. Whether the regulation ultimately succeeds in reducing global deforestation will depend in large part on its ability to include, rather than exclude, the millions of smallholder farmers who produce a substantial share of the commodities it covers.

The findings presented in this paper suggest that the principal challenge is no longer awareness of the regulation. Across the countries surveyed, most smallholders had heard of the EUDR. Instead, the remaining barriers are structural. Limited land tenure security, high compliance costs, insufficient technical capacity, weak digital infrastructure, and uneven access to producer organizations continue to constrain farmers' ability to demonstrate compliance, regardless of their willingness to do so.

The study also demonstrates that compliance capacity is not evenly distributed. Producers integrated into cooperatives, buyer programs, or VSSOs generally benefit from stronger traceability systems, better documentation, and greater access to training and technical assistance. Independent producers, by contrast, face a substantially steeper path toward compliance, increasing the risk that implementation could reinforce existing inequalities within agricultural supply chains.

At the same time, the EUDR should not be viewed solely as a compliance exercise. If accompanied by adequate investment and coordinated support, the regulation has the potential to strengthen agricultural governance more broadly by improving land administration, promoting digital traceability, encouraging sustainable production practices, and increasing transparency throughout commodity supply chains. The recent simplification measures adopted by the European Commission represent an important step toward reducing administrative burdens, particularly for micro and small primary operators. However, because most smallholders export indirectly through intermediaries, many of the practical compliance challenges identified in this study remain unchanged.

Ensuring inclusive implementation will therefore require coordinated action across governments, private sector actors, and VSSOs. Producer-country governments have a central role in strengthening land administration, farmer support services, and digital infrastructure. Buyers and downstream operators should make full use of the EUDR's explicit recognition that supplier support, particularly for smallholders, is part of effective risk mitigation. VSSOs can complement these efforts by aligning their requirements with the regulation, leveraging existing assurance systems, and serving as trusted channels for training and technical assistance.

Ultimately, the success of the EUDR should be measured not only by reductions in deforestation but also by whether it enables smallholders to remain active participants in sustainable global supply chains. An implementation approach that combines environmental ambition with targeted support for producers will be better positioned to deliver both the environmental and social objectives that underpin the Regulation. The economic aspect matters too, namely, whether the approach is profitable for producer organizations and producers themselves.

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Appendix A. Interview and Survey Questions

Section 1: General information

1. Can you tell me about your farm (size, crops grown, farming practices)?
2. How long have you been farming?
3. Where do you usually sell your products? International markets, local markets, or both?

Section 2: Awareness and understanding of the EUDR

4. Have you heard of the EU Deforestation Regulation (EUDR)?
    - If yes, what do you know about it?
    - If no, would you like to learn more about it?
5. Where do you get information about new agricultural policies and market requirements (government, cooperatives, traders, NGOs)?

Section 3: Challenges in compliance with EUDR

6. Do you see any challenges in meeting the EUDR requirements? If so, what are the main difficulties? Could you please elaborate?
    - Awareness and understanding of requirements
    - Financial barriers (e.g., costs of compliance, certification)
    - Land tenure and documentation issues
    - Technical capacity (e.g., access to traceability tools, training)
    - Market access concerns (e.g., risk of exclusion from supply chains)
    - Other (please specify)
7. Do you have clear land ownership documentation? If not, what challenges do you face in obtaining it?
8. Have you received any guidance or training on how to comply with EUDR?
   If yes, from whom?

Section 4: Economic and social implications

9. How do you think EUDR will impact your income and market access? Are you concerned that small farmers might be excluded from international supply chains due to EUDR?
10. Could stricter regulations push farmers toward unregulated markets? Why or why not?

Section 5: Needs and support mechanisms

11. What kind of support would help you to comply with EUDR? Could you please elaborate?
    - Financial assistance (grants, loans, subsidies)
    - Training and awareness programs
    - Access to technology and traceability tools
    - Policy guidance from the government
    - Support from buyers and traders
    - Other (please specify)
12. Have you worked with any sustainability certification (e.g., RSPO, FSC, Rainforest Alliance)? If yes, do you think these standards help or support compliance with EUDR?
13. What role do you think the government should play in helping smallholders comply with EUDR?
14. What kind of support or actions do you expect from the private sector, buyers, or exporters?

Section 6: Recommendations and final thoughts

15. In your opinion, what would be the best way to ensure that small farmers are included in sustainable supply chains?
16. If you could suggest one change to make EUDR fairer for smallholders, what would it be?
17. Do you have any additional concerns, suggestions, or comments about the EUDR or its implementation?

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