

Sustainable
Palm Oil
Dialogue
Europe



Welcome to the Sustainable Palm Oil Dialogue 2026

*Resilience in Palm Oil
Thriving in a Turbulent World*

Chester Zoo, United Kingdom
9 June 2026





Time	🌱 Climate	🌿 Nature	👤 People
08:30	🚶 Delegate Arrival, Registration & Welcome Refreshments — Reception Area & Joinery		
09:00	Opening: Welcome Welcome & Opening 📍 Atrium, The Square		
09:05	Keynote Speaker		
09:35	Plenary Session I : Defining Resilience 📍 Atrium, The Square		
10:15 –11:15*	Breakout I — Climate Low Carbon Palm Oil: How to Decarbonise at Mills and in Smallholder Farms 📍 Garden Room, The Oakfield	Breakout I — Nature Measuring Impact & Nature Engagement as Downstream Responsibility 📍 Atrium, The Square	Breakout I — People Driving Systemic Change on Human Rights in Palm Oil Supply Chains Through Scale and Collaboration 📍 Smithy & Tack, The Square
11:15	🚶 Mid-Morning Refreshments — Reception Area & Joinery		
11:40–12:40*	Breakout II — Climate Linking Landscape Initiatives to GHG Reporting Frameworks 📍 Smithy & Tack, The Square	Breakout II — Nature Landscape Action on Nature for Resilience: Progress and Gaps in Palm Oil 📍 Garden Room, The Oakfield	Breakout II — People From Boycotts to Buy-In: How to Transform Consumer Perceptions on Palm Oil 📍 Atrium, The Square
12:40	🍽 Lunch — Finger Buffet, Reception Area & Joinery		
13:40	Plenary Session 2: Beyond EUDR: From Legal Compliance to Real-World Change 📍 Atrium, The Square		
14:20–15:20*	Breakout III — Climate Closing the Loop on Climate Responsibility 📍 Smithy & Tack, The Square	Breakout III — Nature Beyond 2025 DCF Commitments: Transitioning to Resilient Palm Oil Supply Chains (please note 80 min ending at 15.40 with coffee in the room) 📍 Atrium, The Square	Breakout III — People The Emerging Business Case for Smallholder Inclusion in Deforestation-Free Markets 📍 Garden Room, The Oakfield
15:20	🚶 Afternoon Refreshments — Reception Area & Joinery		
15:40	Plenary Session 3: The Road to 2030: Scaling Impact in Sustainable Palm Oil 📍 Atrium, The Square		
16:20	Closing Remarks & Event Close Delegates depart via Private Events Entrance		



BREAKOUT CLIMATE 1

(10.15 - 11.15)

Breakout Session 1: Climate

Low carbon palm oil: How to decarbonise at mills and in smallholder farms?



Moderator

Matthew Spencer
Global Director on Climate
and Nature, IDH



Wei Peng
Global Head of Sustainability,
Louis Dreyfus Company



Manuel Davila
Managing Director
DAABON EUROPE & UK



Perpertia George
Sustainability & Climate Change
Director – Nature Lead
PwC Malaysia



Please make your way to the Reception Area



Coffee

Break

11.15 - 11.40



Breakout Session 2: Nature

Landscape Action on Nature for Resilience:
Progress and Gaps in Palm Oil



Moderator

Ari Sutanti

Program Director,
IDH Indonesia



Claire Prescott

Head of Sustainable Places,
CDP



James d'Ath

Technical Lead for Data & Analytics,
Taskforce on Nature-related
Financial Disclosures (TNFD)



Olivier Tichit

Director of Communications
and Sustainability
Musim Mas



Please make your way to the Reception Area

Lunch Break

12.40 - 13.40



Breakout Session 3: People

The Emerging Business Case for Smallholder
Inclusion in D-free Markets



Moderator

Tessa Meulenstein
Global Markets Director,
IDH



Marieke Leegwater
Senior Policy Influencing Advisor,
Solidaridad



Eddy Esselink
Senior Manager Sustainable
Development, MVO



Emma Maetens
Sustainability Coordinator,
Puratos



Josil Murray, PhD
Value Chain Expert,
European Forest Institute (EFI)

Insights from EUDR Dry Runs: Key Challenges and Emerging Best Practices

Regional Technical Dialogue #6

10 June 2026



Co-funded by
the European Union



Team Europe Initiative on
Deforestation-free Value Chains



COUNTRIES

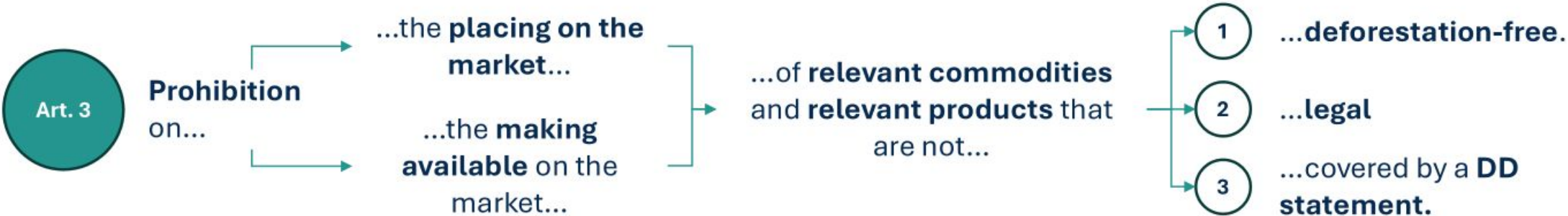
where we work



Application of a Risk Based Due Diligence under the EUDR

The EUDR targets EU Operators. It combines a prohibition and a due diligence obligation

What?



How?



The prohibition is an *obligation of results* that applies to relevant commodities and relevant products

The due diligence obligation is an *obligation of means* that applies to operators and non-SME traders.

EUDR Due Diligence: 3-Step Process



The first step focuses on gathering “**information, data and documents**,” - serves as the evidentiary basis for the subsequent risk assessment.

Steps 2 & 3 are explicitly risk-based, confirming EUDR compliance cannot be reduced to possession of documents.

Legal Foundation of Due Diligence

- **Due diligence under the EUDR is not new** – it is based on long-standing legal doctrine
- It aligns with established interpretations in **international and EU laws** where:
Due diligence = obligation of means, not an obligation of results
- International courts and tribunals have consistently interpreted due diligence as requiring actors to

“to employ all means reasonably available, in light of the circumstances and the information available at the relevant time, without any obligation to guarantee a particular outcome” - International Court of Justice

- Available information
- Specific circumstances
- Not perfection !

What does “risk-based” Due Diligence really mean?

The Court of Justice of the European Union (CJEU) has no formal definition of “due diligence,” its case law gives clear guidance on how to understand it in practice.

- Due diligence is about
 - **how an operator behaves**, not about achieving perfect results.
- Importantly, the CJEU has clarified two limits:
 - Operators are **not required to do more than what is reasonably expected** based on the risks they face.
 - They are **not expected to obtain information or documents they cannot legally or practically access**.
- A “risk-based” approach means that:
 - The **higher the risk**, the more thorough the checks and precautions should be.
 - The **lower the risk**, the lighter the checks can be.

Some key point for consideration

1. Risk inherently involves uncertainty

- We don't have complete information → **uncertainty** is unavoidable

2. Purpose of risk assessment

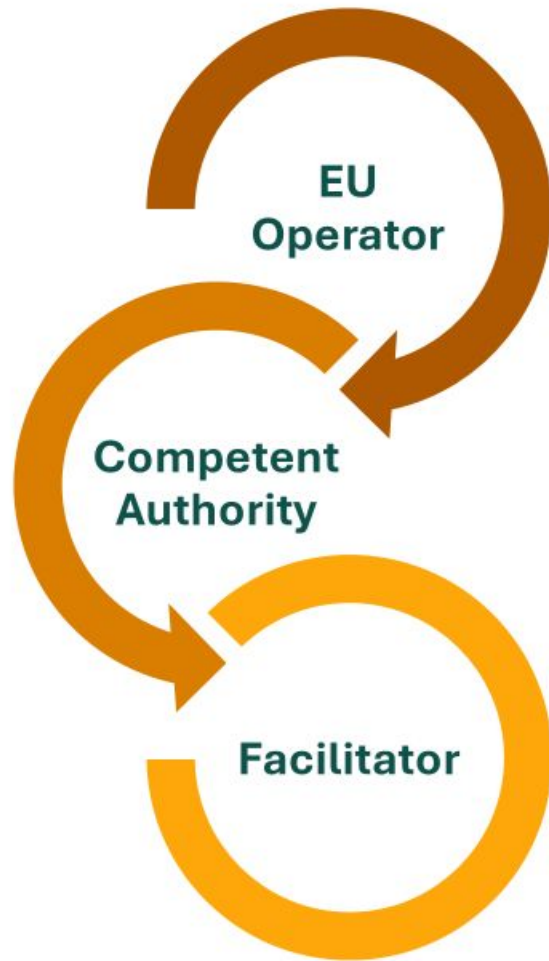
- Not to eliminate uncertainty
- But to **understand and manage it**

3. Why it matters

- Helps us **make decisions**
- Helps us **balance trade-offs**
(cost vs. risk reduction)

EUDR Preparedness Exercises (Dry runs)

Voluntary 'dry run' simulating checks on an operator's DD-System and shipments



Parties in the exercise

EU Operator

Role: Represents an Operator subject to the EUDR requirements

Competent Authorities

Role: Represents the regulatory enforcement side of the EUDR

European Forest Institute

Role: Facilitator & knowledge partner

The Process

Part 1: Submission of information onto the EUDR IT System – generation of DDS



Part 2: Check on Operator's Due Diligence System (Virtual meeting)



Part 3: Simulated inspection (face to face meeting)

EFI facilitated EUDR Dry runs in 2025

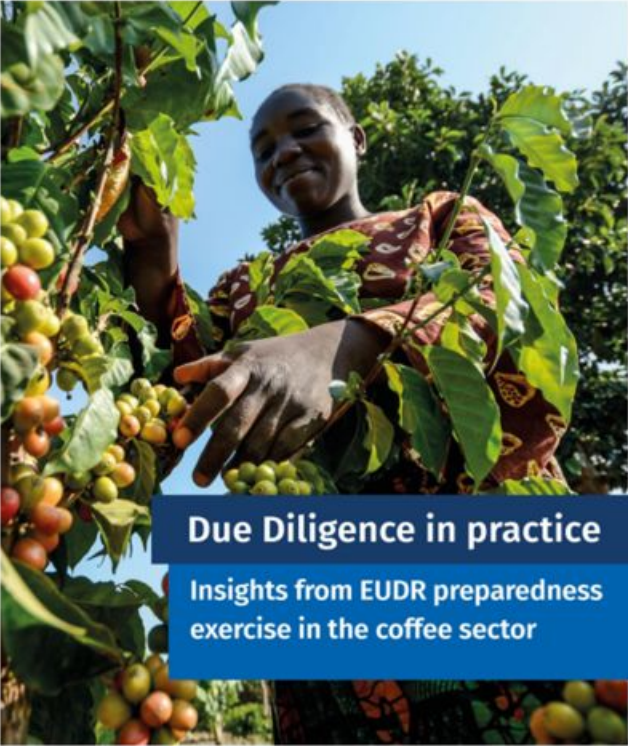
4 – 5 more planned in 2026

Commodity	Competent Authorities	Operators	Origins of shipments
Coffee	Belgium and France	1	Uganda, Vietnam, Brazil, Honduras
Coffee	Germany and the Netherlands	1	Kenya, Tanzania, Peru, Colombia
Palm oil	Spain	2	Indonesia, Malaysia

Dry Run Insights

EFI | Deforestation-free value chains Technical facility

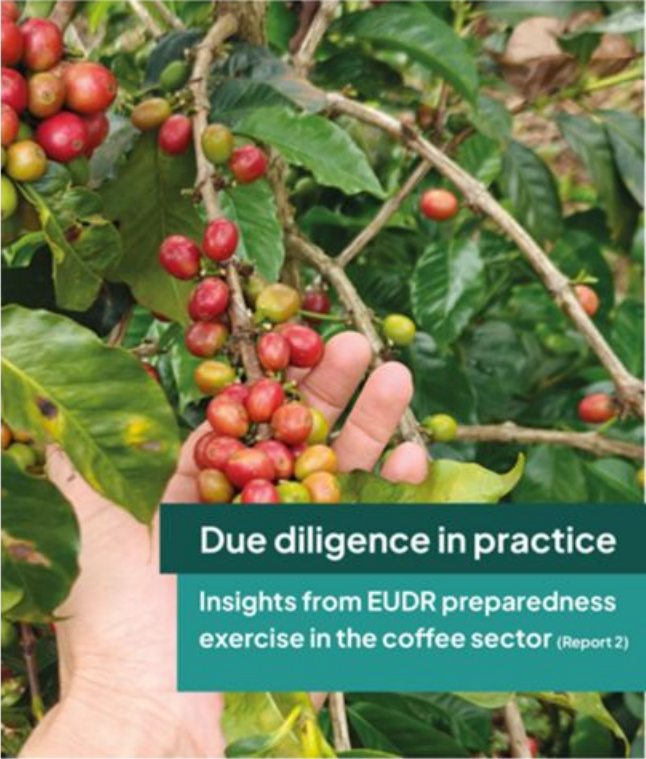
• • • November 2025



Due Diligence in practice
Insights from EUDR preparedness exercise in the coffee sector

EFI | Deforestation-free value chains Technical facility

• • • February 2026



Due diligence in practice
Insights from EUDR preparedness exercise in the coffee sector (Report 2)

EFI | Deforestation-free value chains Technical facility

• • • February 2026



Due Diligence in practice
Insights from EUDR preparedness exercise in the palm oil sector

Global Gateway | Funded by the European Union | Team Europe Initiative on Deforestation-Free Value Chains | France | MS | Deforestation-free value chains Technical facility

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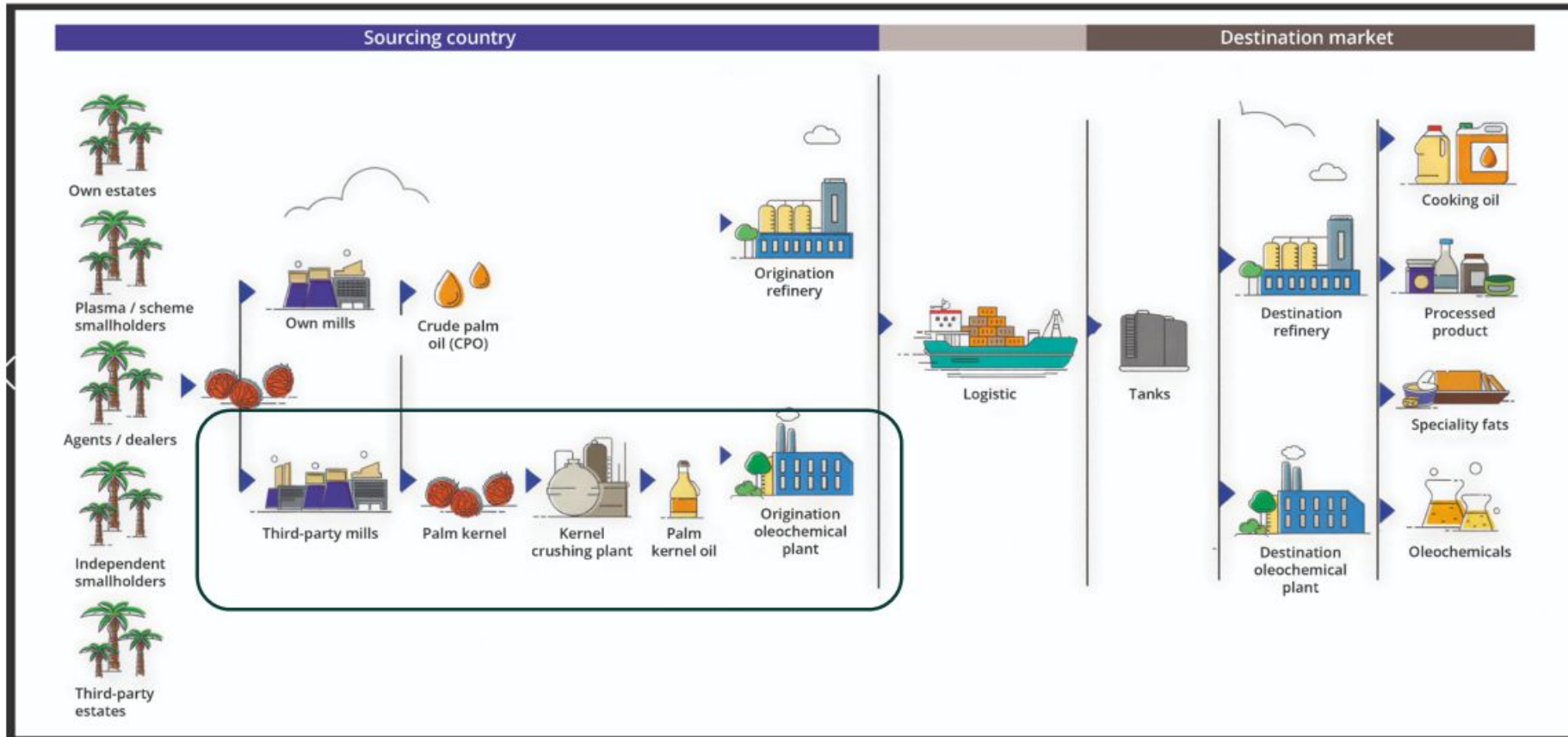
Reports: <https://efi.int/partnerships/valuechains>

10 Key lessons

Palm Oil Preparedness Exercises

Challenges & emerging best practice

Complexities of Crude Palm Kernel Oil (CPKO) Supply Chain



- Smallholder volumes unavoidable
- Dependent on intermediaries
- High risk of mixing
- Few PKO crushers
- Segregation challenging
- Lower rates of certification

Importance of a robust Due Diligence System

- A well-functioning due diligence system (DD-System) is the cornerstone of EUDR compliance
- Risk-proportionate approach to information collection can be applied
- DD-System must be targeted, verifiable, and effective in practice — **not just described on paper**

"It is the operator's responsibility to show and explain in an inspection why the information provided is sufficient and complete."

1

Who Does What: Operator's Responsibility in Multinational Supply Chains

It is challenging to clearly define roles & responsibilities in the due diligence process for multinational structures

- CAs learned that palm oil supply chains are often **vertically integrated & multinational**, with risk assessments often conducted by specialized teams across different countries and subsidiaries.
- Under the EUDR, the **EU-based Operator** is legally accountable for compliance, regardless of where data collection or analysis takes place.
- While **data and expertise may come from affiliated companies** (“eyes and ears on the ground”), the Operator must:
 - Own the **risk assessment, mitigation, and compliance decisions**
 - Clearly document **who does what**, how inputs are reviewed, and how decisions are taken.

“We want to talk with the people who concluded that the products are compliant”

2

Credible deforestation risk assessment requires explanation

A simple statement that a product is “deforestation-free” is not sufficient

- CAs expect the operator to explain the steps taken to reach a negligible-risk conclusion
- Operators often struggle to describe the assessment process when they rely on external service providers
- **Good practice:**
 - Document the methodology, data sources and assessment process
 - Record all findings—including false positives.
 - Explain how false positives were identified and resolved.
 - Describe follow-up actions (e.g., field verification).



“We need to know how you dealt with false positives. For instance, if there is an overlap between the JRC 2020 forest map and some of the plots linked to your shipment, we expect the operator to be able to explain how this was dealt with.”

3

Cross-referencing different maps gives confidence in deforestation risk assessments

Identifying the most reliable datasets and evidence sources for deforestation verification remains a challenge

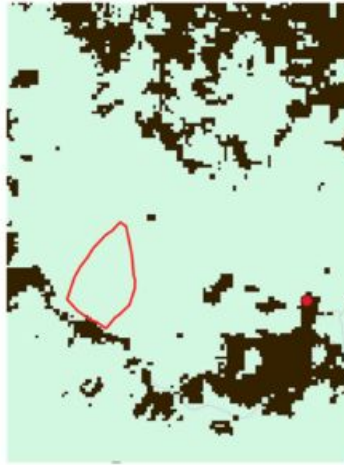
LULC 2018



LULC 2024



2020 Coffee Map



A polygon crossed with the Honduras 2018 map shows an area of coffee plantation, while the 2024 shows the area is a forest land, and the coffee map shows there is no coffee inside the polygon

- Combining multiple sources of evidence provides stronger assurance for deforestation checks than relying on a single dataset
- Cross-checking examples:
 - JRC forest map + global datasets (e.g. GFW)
 - national datasets (e.g. SIMONTANA, ID)
 - commodity maps (e.g. coffee planted areas) when forest data are limited
- Include **national forest monitoring data** when available and accessible
- In the dry run CAs explored use of tools (e.g. WHISP) based on **convergence of evidence**

4

Risk of mixing & deforestation: assess deforestation inside and around the plot

Plot-level focus limits understanding of broader landscape risks and mixing potential

Areas with recent or ongoing disturbance are considered high-risk landscapes

- May indicate deforestation pressure, weak governance, or informal / illegal expansion.
- Increases the **risk of mixing** EUDR-compliant and non-compliant products in supply chains.

Possible mitigation measures:

- Robust **traceability** systems to ensure product origin
- Effective **segregation** from unknown / unverified sources
- Continuous **monitoring** of landscape changes

Complement spatial data with NGO reports, media, and whistleblower sources.



5

Legality due diligence begins with a list of laws relevant to the country of production

Operators often overlook the **first critical step in legality due diligence**: identifying national laws relevant to EUDR Article 9

- Operators relying on **certifications or external providers** have limited insight into the critical first step of legality risk assessment
- Recommended sequence for legality due diligence
 1. Understand the country of production—its legal and administrative framework.
 2. Identify relevant legal requirements and map them to EUDR criteria.
 3. Understand how this applies to the area of production
- Legality Due Diligence should:
 - distinguish **estates** and **smallholders**
 - account for **legal complexity** (sub-national laws)
 - Consider long-standing issues flagged by NGOs/ credible 3rd party reports

“A list alone is not enough—operators must show that plots included in the DDS complies with these laws”

Free resource

[Legality Due Diligence Navigator](#) - to map national legal requirements, assess their implementation

6

There are many ways to gather evidence for legality due diligence

Legality due diligence is often treated as a document-collection exercise rather than an evidence-based assessment.

- **Beyond documents:** legality can be demonstrated through information, documents, and data (Art. 9).
- Integrate risk-proportionate approach to legality due diligence
 - Compliance isn't necessarily guaranteed through documents, certifications, checklists, standard procedures alone (though they are important).
 - The search for such 'guarantees' of compliance reduces the process to a procedural 'box-ticking' or heavy 'document-gathering' exercise.

Demonstrating legality for smallholder producers in **Indonesia** can be challenging :

- Many smallholders are not subject to many EUDR legal criteria.
- Legal registration is incomplete < 2% of farmers have a Cultivation Registration Certificate (STD-B).
- Unresolved land tenure issues (e.g. plantations in forest areas)

Legality criteria under Article 9	Primary legal documents	Other evidence to support due diligence
Land-use rights	SHM: Certificate of Ownership SKT: Land Certificate Letter SKGR: Compensation Letter STDB: Cultivation Registration Certificate SPORADIK: Sporadic Land Ownership Statement SK Kemitraan Kehutanan: Forestry Partnership Decree	<ul style="list-style-type: none"> • Identification area with forest area (Protected and Conservation Area) • Bupati Statement letter (Village Head / Authority) • Surat Jual Beli Tanah (Land Sale and Purchase Agreement) • Surat Hibah (Gift Deed) • Farmer Declaration (consultant declaration) • RSPO/ISPO Certificate
Environmental protection	SPPL: Environmental Management Statement Letter	<ul style="list-style-type: none"> • Audit report showing compliance with relevant RSPO/ISPO Certification principles & Criteria • Bupati Statement letter/ Village Head Level (Authority) • Self-declaration • MSD Layer
Third parties' rights	Not available	<ul style="list-style-type: none"> • Proof of consultations carried out as part of RSPO certification • Proof of engagement with communities as part of company CSR engagement
Labour rights	Not available	<ul style="list-style-type: none"> • Audit report showing compliance with relevant RSPO/ISPO Certification principles • Self-declaration / commit by farmer on No Exploitation • Smallholders participated in training on fair labour practices (MoM, BAST, attendance list) • Farmer Questionnaires
Human rights protected under international law	Not available	
The principle of free, prior and informed consent	Not available	<ul style="list-style-type: none"> • Proof of consultations carried out as part of RSPO certification • Proof of engagement with communities as part of company CSR engagement
Tax, anti-corruption, trade and customs regulations	KTP (National ID) or NPWP (Tax ID) numbers	- Self-declaration

7

National databases can facilitate the verification of legal compliance

Under the EUDR, the burden of proof remains with the EU operator, but often, legal documents cannot be kept by the operator without consent



- National databases can support due diligence by allowing operators to verify the validity without holding originals.
- Well-defined workflows in DD-System helps demonstrate how national databases function and how relevant documents can be accessed

Good practice:

- Treat national data as one evidence layer, to be verified with independent sources in risky areas.
- Verify data through sample / ground checks.

“Operators should be prepared to clearly demonstrate how national information systems are used and show how they assessed their reliability”

Mitigation measures: a critical component of a robust due diligence system

Mitigation measures must be targeted, verifiable, and effective in practice
— not just described on paper

- Mitigation actions must be supported by evidence (e.g., documented field visits, audits, records of checks)
- Measures such as **self-assessment reports** and **codes of conduct** are considered **weak on their own**, especially to address:
 - Risks of mixing
 - Traceability gaps down to plot level

“How does the operator verify that plots detected with deforestation are not only removed from their data systems but also excluded from their actual sourcing and supply chain?”

Practical recommendations from Competent Authorities:

Prevent mixing:

→ E.g.: records of training of suppliers on segregate of compliant/non-compliant products.

High-risk suppliers:

→ E.g.: conduct audits or request extra documentation.

Grievance mechanism:

→ E.g.: demonstrate accessible and confidential reporting and follow-up on complaints

Certification:

Can be used to support mitigation if it
→ covers legal requirements
→ robust (audits, oversight)
→ prevents mixing of certified and non-certified products.

9

External tools can support Due Diligence — but cannot replace operator responsibility

How to effectively integrate **certifications and third-party service providers** into a robust due diligence system

- Certification & third-party service providers can support due diligence, **but documenting the process is key.**
- CAs recommend that operators:
 1. Conduct and document their **own due diligence process**
 2. **Understand and verify** external information rather than relying on it at face value
 3. Maintain responsibility for **risk assessment, evidence collection, and verification**

“Operators cannot delegate risk assessment. You must understand, verify, and defend the evidence behind any conclusions”

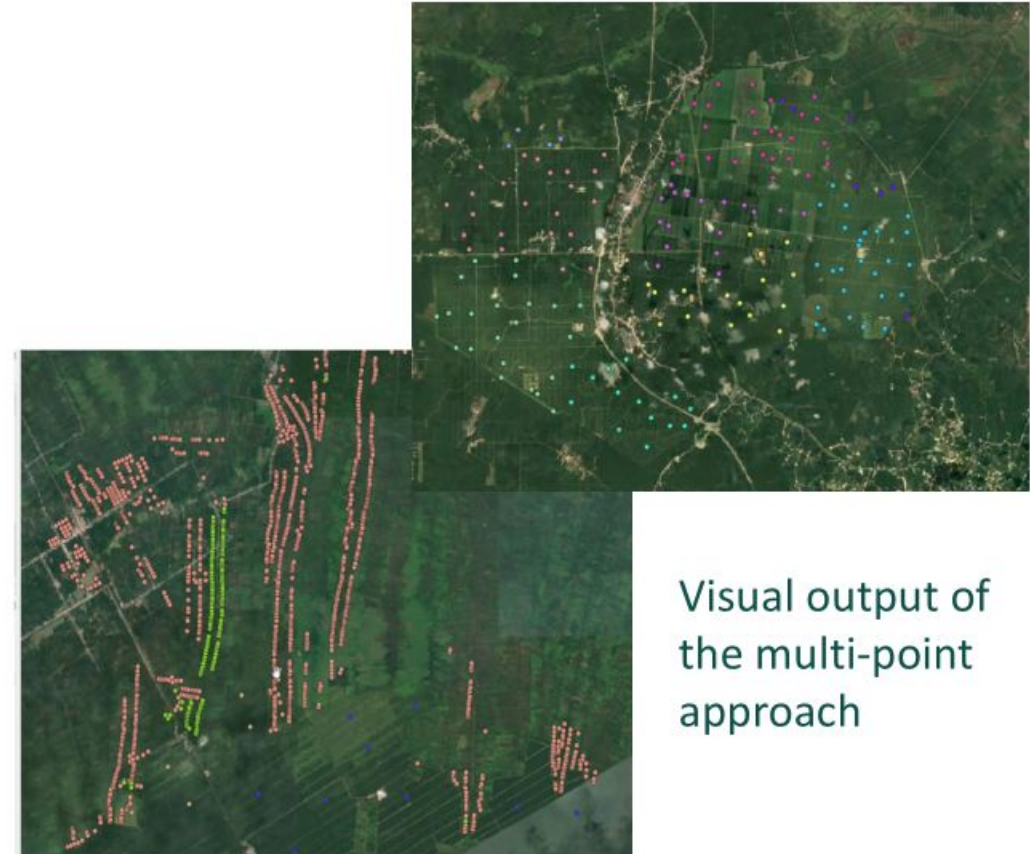
When using certification schemes	When using third-party service providers
<ul style="list-style-type: none"> • Describe the scheme – explain how it supports EUDR compliance • Assess strengths and limitations – understand what the certification does and does not assure • Be transparent about coverage – specify which suppliers / vol. are certified • Use certification as supporting evidence, not proof of compliance 	<ul style="list-style-type: none"> • Understand the data – who collected it, how, and gaps • Understand the methods – models, forest definitions, datasets, thresholds used • Verify independently – cross-check geolocation and analysis (e.g., national maps, field checks) • Document clearly – record how third-party information was validated and used in the DD system

10

Navigating geospatial data restrictions in Indonesia for EUDR compliance

The lack of geolocation data due to origin country restrictions does not exempt an operator from compliance

- Real barriers in sharing geospatial / polygon data in Indonesia was observed
- The Operator did not submit polygon information as required in the EUDR for plots >4ha → deforestation checks could not be meaningfully carried out
- The operator submitted alternatives for consideration by the CA – such alternatives did not align with the definition of geolocation in the EUDR.
- Geospatial Information Agency (Indonesia) develops a new regulation (in draft) – legal clarity on sharing geodata




Visual output of the multi-point approach

Key take away from the exercises..



- The dry run confirmed the **technical feasibility of EUDR compliance** in the palm oil sector, including for supply chains that integrate independent smallholders, when appropriate systems and processes are in place.
- The Spanish Competent Authority **welcomed the level of preparedness** demonstrated during the exercise, noting that the participating companies are among the more experienced and advanced operators in the sector.
- There was a lot of **focus on the Due Diligence System** – emphasis on systems that are **operational and demonstrated in practice**
- **Geospatial data restrictions in Indonesia** is a major concern for operators and competent authority

A close-up photograph of a cocoa branch with several pods. One pod is large and yellowish-orange, while others are smaller and green with some brown spots. The background is a blurred green forest.

**Thank you for your
attention**

Josil Murray, Value Chain Expert
josil.murray@efi.int

Disclaimer

The insights presented here are intended to foster mutual understanding, readiness, and alignment among the different actors involved, at a time when the actors were still in preparation phase.

They should not be interpreted as definitive positions or as representing what may be deemed compliant by the participating Competent Authorities.

Rather, many of the recommendations and observations captured in this presentation point to what could be considered — at this stage, and within the specific supply chain contexts examined — examples of good or emerging best practices for the early implementation of the EUDR.



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**Thank you
for attending SPOD 2026!
See you next year!**



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