

**EUDR Risk Assessment Sample
produced by Big4**



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| | High Risk Criterion |
| | Medium Risk Criterion |
| | Low Risk Criterion |
| | Criterion N/A on Country Level |
| | Criterion currently not assessable |

| No | Country Risk Level with respect to Assessment Criterion | EUDR Requirement | Definition | Basis for Evaluation | Source | Rating | Rating Description | Background to Basis for Evaluation |
|----|---|--------------------|--|---|---|--------|--|--|
| 1 | Assignment of risk to the relevant country of production or parts thereof in accordance with Article 29 | Art. 10(2) lit. a) | N/A | N/A | N/A | N/A | N/A | N/A |
| 2a | Presence of forests in the country of production or parts thereof | Art. 10(2) lit. b) | 'forest' means land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use, Art. 2(4) EUDR | Global Forest Watch Tool category: Natural Forest in Country (2020) | https://www.globalforestwatch.org/map/country/IDN/?mainMap=eyJzaG93OW5hbHlzaXMiOnRydWV9&map=eyJjZW50ZXliOnsibGF0IjotMi41Nzg0NTMwNjA1NjA1NDIsImx1ZyI6MTE4LjAxNTE1NTc5MDAzMDI0fSwiem9vbSI6NC43Mjk1NzY1NTY4MDk3MjYsImNhbkJvdW5kljpmYWxzZSwiZGF0YXNldHMlQlt7ImRhdGFzZXQiOiJwb2xpdGlyYWwtYm91bmRhcmllcyIsImxheWVvcyI6WVYkaXNwdXRlZC1wb2xpdGlyYWwtYm91bmRhcmllcyInBvbG0aWNhbC1ib3VuZGFyaWVzIl0sImJvdW5kYXJ5Ij0cnVlLCjvcGFjaXR5Ij0xLjCj2aXNpYmlsaXR5Ij0cnVlSx7ImRhdGFzZXQiOiJlYXR1cmFsLWZvcmlvZdHMjLjCjSjYlcnMlQlSibmF0dXJhbC1mb3Jlc3RzLTIwMjAiXSwib3BhY2I0eSI6MSwidmlzaWJpbG0eSI6dHJ1ZSwicGFyYW1zIj07InZpc2liaWxpdiHkiOnRydWUslmFkbV9sZXZlbC16ImFkbTAifX1dfO%3D%3D&mapMenu=eyJkYXRhc2V0Q2F0ZWdvcnkiOiJsYW5kQ292ZXIifO%3D%3D | 3 | Methodology: Global tree cover average of natural forests: 27 % 1= low presence of forest in the country (0-19%) 2= average presence of forest in the country (19,01%-38%) 3= high presence of forest in the country > 38 % For Indonesia: 53 % of the country was covered with natural tree cover | Global Forest Watch (GFW) is an online platform that provides free, real-time data, technology, and tools for monitoring the world's forests. The Natural Forest Dashboard for Indonesia on Global Forest Watch provides detailed statistics and interactive charts about forest cover, deforestation rates, and the drivers of forest change in Indonesia. |
| 2b | Presence of forests in the country of production or parts thereof | Art. 10(2) lit. b) | 'forest' means land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use, Art. 2(4) EUDR | Global Forest Watch Tool category: Global Ranking regarding Tree Cover | https://www.globalforestwatch.org/dashboards/global/?category=land-cover&location=WYJnbG9iYWwiXQ%3D%3D | 3 | Methodology: 232 countries are ranked. 1= low presence of forest in the country (Ranks 232-154: 0-57.8 Kha) 2= average presence of forest in the country (Ranks 153-76: 57,81 Kha-3.69 Mha) 3= high presence of forest in the country > 3.69 Mha | Global Forest Watch (GFW) is an online platform that provides free, real-time data, technology, and tools for monitoring the world's forests. The Global Location of Tree Cover Dashboard on Global Forest Watch provides comprehensive data on tree cover across the world. This interactive tool allows users to explore and analyze tree cover change, deforestation rates, and other related metrics using satellite data. |

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| 2 [total] | Presence of forests in the country of production or parts thereof | Art. 10(2) lit. b) | 'forest' means land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use, Art. 2(4) EUDR | N/A | N/A | TOTAL: High | Presence of forests in the country of production or parts thereof consolidated ranking methodology: category: Natural Forest in Country counts 2/3, Global Ranking regarding Tree Cover counts 1/3 1= low risk 2= medium risk 3= high risk | N/A |
| 3 | Presence of indigenous peoples in the country of production or parts thereof | Art. 10(2) lit. c) | N/A | LandMark Tool, category 'National Level Maps' | LandMark | 3 | Methodology: Percent of Indigenous Peoples per country: 3: high presence= >12 % of Indigenous Peoples per country 2: medium presence: 6,01-12 % of Indigenous Peoples per country | The LandMark Tool is an interactive platform designed to provide comprehensive data on land rights and tenure globally. It offers detailed maps and information about the legal and customary land rights of Indigenous Peoples and local communities. |
| 4 | Consultation and cooperation in good faith with indigenous peoples in the country of production or parts thereof | Art. 10(2) lit. d) | N/A | Country Profile Indonesia by IWGIA Overview on laws protecting Indigenous Peoples | https://iwgia.org/en/indonesia.html | 3 | Methodology 1=Low Risk: UNDRIP has been signed, national laws protecting indigenous rights are in place and there are no reports that those rules are not appropriately enforced 2=Medium Risk: UNDRIP has been signed and there are no reports that those rules are not appropriately enforced 3=High Risk: UNDRIP has not been signed and/or national laws protecting indigenous rights are either not in place or according to reputable sources not appropriately enforced For Indonesia: Indonesia signed the United Nations Declaration on the Rights of Indigenous Peoples; Article 18b-2 of the constitution; Law No. 5/1960 on Basic Agrarian | The country profiles by IWGIA provide detailed insights into the situation of Indigenous Peoples in various countries. They include demographic data on Indigenous populations, an overview of national laws and policies affecting Indigenous rights, and analysis of the main challenges faced by Indigenous communities. |
| 5 | Existence of duly reasoned claims by indigenous peoples based on objective and verifiable information regarding the use or ownership of the area used for the purpose of producing the relevant commodity | Art. 10(2) lit. e) | N/A | N/A on country level [needs to be assessed on transaction level] | N/A | N/A | N/A | N/A |

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| 6a | Prevalence of deforestation or forest degradation in the country of production or parts thereof | Art. 10(2) lit. f) | 'deforestation' means the conversion of forest to agricultural use, whether human-induced or not; 'forest degradation' means structural changes to forest cover, taking the form of the conversion of: | Appendix 2 - WWF Biodiversity Risk Filter v2.0, Methodology Documentation, Oct 2024 Category: Forest Canopy Loss | Appendix 2 - WWF Biodiversity Risk Filter v2.0, Methodology Documentation, Oct 2024 | 3,71 | Methodology: 1-2,6= low risk; 2,6-3,4= medium risk; 3,4-5= high risk | Appendix 2 of the WWF Biodiversity Risk Filter v2.0 Methodology Documentation provides detailed insights into the indicators and data sources used to assess biodiversity risks. It outlines the methodology for evaluating the dependencies and impacts of various industries on biodiversity. The appendix includes descriptions of the 33 indicators used to measure biodiversity health, such as ecosystem diversity, species abundance, and |
| 6b | Prevalence of deforestation or forest degradation in the country of production or parts thereof | Art. 10(2) lit. f) | 'deforestation' means the conversion of forest to agricultural use, whether human-induced or not; 'forest degradation' means structural changes to forest cover, taking the form of the conversion of: | WWF - Global Deforestation Fronts | https://wwf.panda.org/discover/our-focus/forests-practice/deforestation-fronts/ | N/A | Methodology: N/A= country not listed in the WWF-Global Deforestation Fronts; 3= country listed in the WWF-Global Deforestation Fronts; high risk | The WWF's "Global Deforestation Fronts" report highlights critical areas around the world where deforestation is occurring at alarming rates. These regions, known as deforestation fronts, are primarily located in the tropics and subtropics and are responsible for significant forest loss. Key drivers of deforestation include agriculture, logging, mining, and infrastructure development |
| 6 [total] | Prevalence of deforestation or forest degradation in the country of production or parts thereof | Art. 10(2) lit. f) | 'deforestation' means the conversion of forest to agricultural use, whether human-induced or not; 'forest degradation' means structural changes to forest cover, taking the form of the conversion of: | N/A | N/A | TOTAL: High | 1 match in the WWF-Global Deforestation Fronts data leads automatically to High | N/A |
| 7 | Source, reliability, validity, and links to other available documentation of the information received | Art. 10(2) lit. g) | While the criteria refers to the whole Art. 9 (1) only Art. 9 (1) lit. g and lit. h are in scope in view of our interpretation Art. 9 (1) lit. (g) adequately conclusive and verifiable information that the relevant products are deforestation-free; lit. (h) adequately conclusive and verifiable information that the relevant commodities | N/A on country level [needs to be assessed on transaction level] | N/A | N/A | N/A | N/A |
| 8a | Concerns in relation to the level of corruption, prevalence of document and data falsification | Art. 10(2) lit. h) | N/A | Corruption Perception Index 2023 | https://www.transparency.org/en/cpi/2023 | 34 | Methodology: 0-33= high risk; 33,1-66= medium risk; >66 low risk For Indonesia: | The Corruption Perceptions Index (CPI), published annually by Transparency International, measures the perceived levels of public sector corruption in countries and territories around the world. The CPI scores countries on a scale from 0 (highly corrupt) to 100 (very clean). |

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| 8b | Concerns in relation to the level of corruption, prevalence of document and data falsification | Art. 10(2) lit. h) | N/A | Economic Freedom Index 2023 category: Judicial Effectiveness | https://www.heritage.org/index/pages/country-pages/indonesia | 5 | Methodology: 5 levels (1 = free (100-80), 2 = mostly free (80-70), 3 = moderately free (70-60), 4 = mostly unfree (60-50), 5 = repressed (0-50)) Lvl 1-2= Low Risk Lvl 3= Medium Risk Lvl 4-5= High Risk | The Judicial Effectiveness component of the Economic Freedom Index evaluates the efficiency and integrity of a country's judicial system. It measures how well the judiciary enforces laws, protects property rights, and ensures fair and timely resolution of disputes |
| 8c | Concerns in relation to the level of corruption, prevalence of document and data falsification | Art. 10(2) lit. h) | N/A | Economic Freedom Index 2023 category: Government Integrity | https://www.heritage.org/index/pages/country-pages/indonesia | 5 | 5 levels (1 = free (100-80), 2 = mostly free (80-70), 3 = moderately free (70-60), 4 = mostly unfree (60-50), 5 = repressed (0-50)) Lvl 1-2= Low Risk Lvl 3= Medium Risk Lvl 4-5= High Risk | The Government Integrity component of the Economic Freedom Index assesses the extent to which a government operates transparently and free from corruption. It evaluates factors such as the prevalence of bribery, the effectiveness of anti-corruption measures, and the overall transparency of government operations |
| 8d | Concerns in relation to the level of corruption, prevalence of document and data falsification | Art. 10(2) lit. h) | N/A | WJP Rule of Law Index 2024 category: Absence of Corruption | https://worldjusticeproject.org/rule-of-law-index/country/2024/Indonesia/Absence%20of%20Corruption/ | 2 | Methodology: 3 levels (3= high risk of corruption (0-0,33); 2= average risk of corruption (0,34-0,66); 1= low risk of corruption (0,67-1)) | The Absence of Corruption part of the WJP Rule of Law Index measures how free public officials are from corruption, including bribery, improper influence, and misappropriation of public funds. It reflects the integrity and transparency of government operations, which |
| 8 [total] | Concerns in relation to the level of corruption, prevalence of document and data falsification | Art. 10(2) lit. h) | N/A | N/A | N/A | TOTAL: High | Each criteria is weighted the same: in case of parity the higher risk category gets chosen. | N/A |
| 9 | Concerns in relation to lack of law enforcement | Art. 10(2) lit. h) | concerns in relation to the country of production and origin or parts thereof, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human | WJP Rule of Law Index 2024 category: Regulatory Enforcement | https://worldjusticeproject.org/rule-of-law-index/country/2024/Indonesia/Regulatory%20Enforcement/ | 2 | Methodology: 3 levels (3= high risk of corruption (0-0,33); 2= average risk of corruption (0,34-0,66); 1= low risk of corruption (0,67-1)) For Indonesia: 0,57 | The WJP Rule of Law Index measures how the rule of law is experienced globally, covering 142 countries. It assesses factors like government constraints, corruption, open government, fundamental rights, security, regulatory enforcement, civil justice, and criminal justice. The Country Profile provides detailed insights for each country, including overall scores, |
| 10a | Concerns in relation to violations of international human rights | Art. 10(2) lit. h) | N/A | ITUC Global Rights Index (2024) | https://www.ituc-csi.org/IMG/pdf/2024_ituc_global_rights_index_en.pdf?31226/ce28bb2139c2fe0d4e5f0a36d726ac7334d1c2d9be8b29dd88b4d2b9d89f5654 | 5 | Methodology: 1 = sporadic violations of rights, 2 = repeated violations of rights, 3 = regular violations of rights, 4 = systematic violations of rights, 5 = no guarantee of rights, 6 = no guarantee of rights due to the breakdown of the rule of law | The 2024 ITUC Global Rights Index reveals a decline in workers' rights worldwide. Nearly 90% of countries violated the right to strike, and around 80% denied collective bargaining rights. Arbitrary arrests of trade union members occurred in 49% of countries, up from 46% in 2023. Restriction of freedom of speech and assembly was noted in 43% of countries, a slight increase from 42% in 2023. Key incidents include restrictions on street |
| 10b | Concerns in relation to violations of international human rights | Art. 10(2) lit. h) | N/A | Human Rights Index (2023) | Human rights index, 2023 | 0,73 | Methodology: 0= no rights, 1= most rights 0-0,33 high risk; 0,34-0,66 medium risk; >0,66 low risk For Indonesia: 0.73 | The Human Rights Index measures the extent to which individuals enjoy fundamental human rights in various countries. It evaluates factors such as freedom from government torture, political killings, forced labor, and the protection of property rights. Additionally, it assesses freedoms of movement, religion, expression, and association. This index provides a comparative measure of human |
| 10 [total] | Concerns in relation to violations of international human rights | Art. 10(2) lit. h) | N/A | N/A | N/A | TOTAL: Medium | Equal assessment: 1 high risk; 1 low risk= medium risk | N/A |

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| 11 | Concerns in relation to armed conflict | Art. 10(2) lit. h) | N/A | Conflict Index: December 2024 | https://acleddata.com/conflict-index/#map | 1 | Methodology: 0= Low/Inactive 1= turbulent situation 2= high conflict situation 3= extreme conflict situation 1= low risk (0-1) 2= high risk (2-3) | The Conflict Index for December 2024, published by ACLED, assesses global conflict levels based on four key indicators: deadliness, danger to civilians, geographic diffusion of conflict, and armed group fragmentation. |
| 12a | Concerns in relation to sanctions imposed by the UN Security Council or the Council of the European Union | Art. 10(2) lit. h) | N/A | United Nations Security Council Repertoire | UN Security Council Sanctions | 1 | Methodology: 3=sanction imposed: high risk 1=no sanction imposed: low risk | The United Nations Security Council Repertoire provides comprehensive coverage of the Security Council's interpretation and application of the UN Charter and its Provisional Rules of Procedure. It documents the Council's decisions, practices, and activities, offering insights into how it addresses issues of international peace and |
| 12b | Concerns in relation to sanctions imposed by the UN Security Council or the Council of the European Union | Art. 10(2) lit. h) | N/A | EU Sanctions Map | https://sanctionsmap.eu/#/main | 1 | Methodology: 3=sanction imposed: high risk 1=no sanction imposed: low risk | The EU Sanctions Map provides detailed and up-to-date information on the European Union's restrictive measures across the globe. It includes data on financial sanctions, travel bans, and export restrictions imposed on individuals, entities, and countries. The map covers various thematic areas such as human rights, cyber-attacks, and the proliferation of weapons of mass destruction. It serves as a |
| 12 | Concerns in relation to sanctions imposed by the UN Security Council or the Council of the European Union | Art. 10(2) lit. h) | N/A | N/A | N/A | TOTAL: Low | Risk always high, whenever the United Nations Security Council Repertoire or the EU Sanctions Map show high risk | N/A |
| 13 | Complexity of the relevant supply chain and the stage of processing of the relevant products, in particular difficulties in connecting relevant products to the plot of land where the relevant commodities were produced | Art. 10(2) lit. i) | N/A | N/A on country level [needs to be assessed on transaction level] | N/A | N/A | N/A | N/A |
| 14 | Risk of circumvention of the EUDR or of mixing with relevant products of unknown origin or produced in areas where deforestation or forest degradation has occurred or is occurring | Art. 10(2) lit. j) | N/A | N/A on country level [needs to be assessed on transaction level] | N/A | N/A | N/A | N/A |
| 15 | Conclusions of expert groups | Art. 10(2) lit. k) | N/A | Evaluation of meeting documents of the Meeting of the expert Group/Multistakeholderplatform with a focus on deforestation and forest degradation | https://ec.europa.eu/transparency/expert-groups-register/screen/meetings/consult?lang=en&do=groupDetail.groupMeeting&meetingId=23741 https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupId=3282&fromMeetings=true&meetingId=23741 | 1 | Methodology: Analyzation of recommendations; if strict recommendations for certain countries are published, those are deemed as high risk 3= Country specific recommendations are published: high risk 1= No country specific recommendations are published: low | N/A |

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|----|------------------------|--------------------|--------------------------------------|---|-----|-----|-----|-----|
| 16 | Substantiated concerns | Art. 10(2) lit. l) | Intersection with Art. 10 (2) lit. m | N/A on country level [needs to be assessed on | N/A | N/A | N/A | N/A |
| 17 | Other information | Art. 10(2) lit. m) | N/A | N/A on country level [needs to be assessed on | N/A | N/A | N/A | N/A |
| 18 | Verified schemes | Art. 10(2) lit. n) | N/A | N/A on country level [needs to be assessed on | N/A | N/A | N/A | N/A |

*** EXAMPLE OF REQUIRED DOCUMENTATION BASED ON EU-INDONESIA VPA AGREEMENT***

LEGALITY STANDARD 3: THE STANDARD FOR PRIVATELY-OWNED FORESTS

| No | Principles | Criteria | Indicators | Verifiers | Related Regulations |
|--|---|---|---|--|--|
| 1. | P1. Timber ownership can be verified | K1.1 Legality of ownership or land title in relation to the timber harvesting area. | 1.1.1 Private land or forest owner can prove ownership or use rights of the land. | Valid land ownership or land tenure documents (land title documents recognized by competent authorities) | Act 5/1960 Regulation of the Minister for Forestry P33/2010 |
| | | | | Land Cultivation Right. | Government Regulation PP12/1998 |
| | | | | Deed of Establishment of the Company | Regulation of the Minister for Trade 36/2007 |
| | | | | Business licence for companies engaging in trading business (SIUP) | Regulation of the Minister for Trade 37/2007 |
| | | | | Company registration (TDP) | Act 6/1983 |
| | | | | Tax payer registration (NPWP) | Act 13/2003 |
| 1.1.2 Management units (either owned individually or by a group) demonstrate valid timber transportation documents. | Map of the area of private forest and boundaries delineated on the ground. | Act 23/2003 Act 20/2009 | | | |
| | Certificate of Timber Origin or Log Transport Document | Regulation of the Minister for Forestry P30/2012 | | | |
| 1.1.3 Management units show proof of payment of applicable charges related to trees present prior to the transfer of rights or tenure of the area. | Invoice/ sales receipt/ freight clearance. | | | | |
| | Proof of payment of Reforestation Fund and/or Forest Resources Fee and compensation to the state for the value of stumpage cut. | Regulation of the Minister for Forestry P18/2007 | | | |

| No | Principles | Criteria | Indicators | Verifiers | Related Regulations | |
|----|---|--|---|---|--|---|
| 2. | P2. Compliance with environmental and social aspects related to timber harvesting in the case of areas subject to Land Cultivation Rights | K2.1 Permit holder has an approved Environmental Impact Assessment (EIA) document and has implemented measures identified in it. | 2.1.1 Permit holder has EIA documents approved by the competent authorities which cover the entire work area. | EIA documents | Government Regulation PP27/1999 Regulation of the Minister for Forestry and Plantation 602/1998 | |
| 3. | P3. Compliance with labour laws and regulations in the case of areas subject to Land Cultivation Rights | K3.1 Fulfilment of occupational safety and health (OSH) requirements | 3.1.1 Availability of OSH procedures and their implementation | Implementation of OSH procedures | Regulation of the Minister for Manpower & Transmigration 01/1978 | |
| | | | | OSH equipment | | |
| | | | | Employment injury records | Regulation of the Minister for Forestry P12/2009 | |
| | | K3.2 Fulfilment of workers' rights | 3.2.1 Freedom of association for workers | Workers belong to workers unions or company policies allow workers to establish or get involved in union activities | Act 21/2000 Regulation of the Minister for Manpower & Transmigration 16/2001 | |
| | | | | 3.2.2 Existence of collective labour agreements | Collective labour agreement documents or company policy documents on labour rights | Act 13/2003 Regulation of the Minister for Manpower & Transmigration 16/2011 |
| | | | | | 3.2.3 Company does not employ minors underage workers | There are no underage workers |