MORIL TRADING ENTERPRISE INC.

EUDR buyer checklist for palm oil and natural rubber

Version: November 2026

Use this checklist with any supplier of crude palm oil, palm products, natural rubber or rubber products for the EU market. It follows the due diligence steps in Regulation (EU) 2023/1115, as amended by Regulation (EU) 2025/2650. It is a practical aid, not legal advice.

1. Scope and your role

- [ ] List every HS code you import and check each one against Annex I of the EUDR.
- [ ] Confirm whether you are the operator (first to place the product on the EU market) or a downstream operator or trader.
- [ ] Confirm your company size category, which sets your application date: 30 December 2026 for large and medium operators, 30 June 2027 for micro and small.
- [ ] Register in the EU information system and make a test due diligence statement.

2. Information to collect for each consignment

- [ ] Product description, trade name, HS code and quantity (net weight).
- [ ] Country of production.
- [ ] Geolocation of every plot of land where the commodity was produced.
- [ ] Date or time range of production.
- [ ] Name, address and email of the supplier.
- [ ] Name, address and email of any business you supply the product to.
- [ ] Evidence that the product is deforestation-free after 31 December 2020.
- [ ] Evidence that the product was produced in line with the laws of the country of production.

3. Geolocation checks

- [ ] Coordinates use at least six decimal places.
- [ ] Plots over 4 hectares are polygons; smaller plots are points or polygons.
- [ ] The file loads in your GIS or compliance tool (GeoJSON is the format accepted by the EU information system).
- [ ] Plots fall on farmland in the stated country, not in water, towns or protected areas.
- [ ] The number and area of plots are plausible for the shipped volume.
- [ ] Each plot has been screened against forest cover at 31 December 2020, with the dataset named.

4. Legality evidence

- [ ] Land use rights, including customary tenure where formal titles do not exist.
- [ ] Environmental permits where required.
- [ ] Labour rights, including measures against child and forced labour.

- [ ] Human rights and free, prior and informed consent where relevant.
- [ ] Tax, anti-corruption, trade and customs compliance.

5. Risk assessment

- [ ] Check the country risk classification (low, standard or high) for the country of production.
- [ ] Assess forest cover and deforestation in the production area.
- [ ] Assess supply chain complexity, including smallholders and intermediaries.
- [ ] Assess the risk of mixing with products of unknown origin, at collection, processing and storage.
- [ ] Assess legality concerns, including corruption, land conflicts and labour issues.
- [ ] Record your conclusion and the reasons for it.

6. Risk mitigation (where risk is more than negligible)

- [ ] Request additional information or documents from the supplier.
- [ ] Commission independent surveys, audits or satellite checks.
- [ ] Exclude plots or suppliers that cannot be verified.
- [ ] Do not place the product on the market until the risk is negligible.

7. Filing and records

- [ ] File the due diligence statement before placing the product on the market or exporting it.
- [ ] Give the statement reference number to customs on the declaration.
- [ ] Pass the reference number to your customers where required.
- [ ] Keep due diligence records for five years.
- [ ] Review and update your due diligence system at least once a year.

8. Contract terms with your supplier

- [ ] Seller provides geolocation, legality evidence and chain of custody data for each shipment.
- [ ] Data format and delivery date are agreed, with data received before loading.
- [ ] Data matches lot numbers, quantities and HS codes on the commercial documents.
- [ ] The contract sets a remedy if data is missing, incomplete or wrong.