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Risk Assessment and Risk Mitigation Measures



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Due diligence components

The European Union Regulation on Deforestation-Free Products (Regulation (EU) 2023/1115) establishes strict due diligence obligations for operators placing certain commodities on the EU market or exporting them.

The key elements include:

- Information collection (Article 9 EUDR): including precise geolocation data for every relevant plot of land.
- Risk assessment (Article 10 EUDR): evaluating the likelihood that products originate from land deforested or degraded after 31 December 2020 and/or being illegally produced in standard or high-risk countries.
- Risk mitigation (Article 11 EUDR): required where the risk assessment does not conclude that there is no or only negligible risk of non-compliance.

Thus risk assessment and risk mitigation are central components of due diligence under the EU Deforestation Regulation. Companies placing or exporting relevant commodities on the EU market from standard and high risk countries according to the EU Benchmarking system must conduct a risk assessment and mitigate the identified risks (Article 13 (1) EUDR).

This guidance material provides a practical summary of the regulation and how companies can structure their risk assessment processes and implement effective mitigation measures.

1 Risk Assessment

Risk assessment is a core obligation under the EU Deforestation Regulation for operators placing or exporting relevant commodities from standard- or high-risk countries on the EU market. It forms part of the due diligence system set out in Article 10, which requires operators to verify and analyse the information collected under Article 9 to determine whether there is no or only a negligible risk.

The risk assessment must consider all of the criteria listed in Article 10(2)(a–n). While the Regulation defines these criteria, it does not prescribe a fixed methodology for how the assessment must be carried out. Instead, operators are required to base their assessment on reliable and verifiable documentation. This may include, for example, official documents from public authorities, contractual agreements, court decisions, or impact assessments and audits. Information collected under the legality assessment can be also used for risk assessment purposes.

Operators must ensure that such documentation is credible and verifiable. In addition, they must be able to clearly demonstrate:

- how the collected information was checked against the EUDR risk assessment criteria, and
- how the final risk level (e.g. negligible or non-negligible) was determined

Simplified Due Diligence - Relief (Article 13 (1) EUDR) from Risk Assessment and Risk Mitigation, if:

- all relevant commodities come exclusively from low-risk countries/regions
- negligible risk in the complexity of the supply chain, risk of circumvention of EUDR rules and risk of mixing

If all conditions are met:

- No full risk assessment (Article 10 EUDR) required
- No risk mitigation measures (Article 11 EUDR) required
- But still basic due diligence obligations still apply (data, DDS, traceability)



Fairtrade Standards and EUDR's risk assessment

The table highlights areas where Fairtrade Standards partially address topics related to EUDR risk assessment aspects as per Article 2(40) (a-h). These references should not be interpreted as confirmation of compliance with the specific national legal requirements covered by the EUDR.

Risk assessment Article 10 (2)	Correlating Fairtrade Standard	Other sources of references
a) Risk category as per EU benchmarking	None	• EU Benchmarking
b) Presence of forest	• SPO Standard 3.1.1, 3.2.31, 3.2.32 • Coffee Standard 3.1.2 - 3.1.8 Environmental Development • Cocoa Standard 3.4.1 - 3.4.7 Deforestation Prevention & Environmental Development	• Forest Area Change in 2015-2025 as Percentage (FAO) • Top 10 Lists World Resources Institute • Global Deforestation Rates by Country GFW
c) Presence of indigenous groups d) Consultation and cooperation with indigenous groups e) Credible claims by indigenous groups	• Coffee Standard 1.1.2 (exporters have not engaged in or contributed to violation of indigenous people's rights) • Cocoa Standard 3.1.4 – 3.1.6; 1.1.2 (exporters have not engaged in or contributed to violation of indigenous people's rights)	• International Property Rights Index • Legal Security of Indigenous Lands (LandMark)
f) Deforestation and degradation rate	• Coffee Standard and Cocoa Standard 3.1.1 (no indication that your members caused deforestation or degradation since 1.01. 2014 (Coffee)/ 31.12.2018 (Cocoa))	• Forest Area Change in 2015-2025 as Percentage (FAO) • Top 10 Lists World Resources Institute • Global Deforestation Rates by Country GFW
g) Credibility of documents	• The certification body will confirm the documentation.	• Corruption Perceptions Index

Risk assessment Article 10 (2)	Correlating Fairtrade Standard	Other sources of references
h) Level of corruption, violations of human rights, armed conflict or presence of sanctions etc.	• SPO Standard 1.1.7 • Coffee Standard: 1.1.2 (exporters have not engaged in or contributed to illegal activities) • Cocoa Standard: 3.2.3 (HREDD risk assessment), 3.3.7 (plans to benefit vulnerable populations), 1.1.2 (exporters have not engaged in or contributed to illegal activities)	• Corruption Perceptions Index • WJP Rule of Law Index • Global Rights Index Trade Union Confederation • The Labour Rights Index 2024 CLR - CLR • Human Rights Recommendations per Country
j) Risk of mixing	• SPO Standard 2.1 Traceability: You only sell as Fairtrade those products which are sourced from your members. For Fairtrade sales you physically segregate the products that were produced by members from the products from non-members, at all stages (e.g. storage, transport, processing, packaging, labelling and handling), until the product is sold	
k) Conclusions of the EU expert group	None	• EU Expert Groups
l) History of non-compliance of operators or traders along the relevant supply chain	• SPO Standard 1.1.6: Compliance with national legislation. There are no indications that you or your members take actions to evade the Standard.	
m) Any relevant information related to non-compliance of the product	• SPO Standard 1.1.6: Compliance with national legislation. There are no indications that you or your members take actions to evade the Standard.	
n) Certifications	Fairtrade FLO-ID and certification	

2 Risk Mitigation

Legal Basis and Relevant Provisions (EUDR)

Under Article 11 of the EUDR, operators must implement adequate mitigation measures before placing products on the market unless Article 10's risk assessment finds no or only negligible non-compliance risk.

Risk Mitigation under the EUDR

Risk mitigation is the set of responsive actions taken to reduce identified risks related to deforestation, forest degradation, legality, and traceability to a negligible level in the context of due diligence. The EUDR does not prescribe fixed mitigation steps, but operators must ensure mitigation is effective, documented, and defensible.

Typical mitigation actions include:

- Requesting additional documents or verification from suppliers.
- Polygon data instead of point data.
- Conducting independent additional audits or third-party verification where information gaps exist.
- Enhancing supplier engagement and capacity building to improve traceability and transparency.
- Adjusting sourcing strategies (e.g. redirecting sourcing from higher-risk areas if mitigation cannot sufficiently reduce risk).



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Conclusion & Implementation Tips

Risk assessment and mitigation are only relevant for raw materials and products from standard or high risk countries.

Risk mitigation is complete only when risk is demonstrably reduced to a level of no cause for concern to be not compliant ("negligible")— documented and retained for compliance purposes.



Further information:

[Fairtrade Risk Map Cocoa](#)
[Fairtrade Impact Platform](#)

Further guidance material:

Fairtrade and EUDR legality aspects

EUDR readiness with Fairtrade

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