

Legal Compliance Dossier: Checklist

For estates, smallholder clusters, outgrowers, FFB dealer/collection centres, mills, kernel-crushing plants, refinery/fractionation, oleochemical or biodiesel plants, bulking/terminal storage operators, exporters/brokers and any logistics providers that hold custody of EU-bound consignments

Cover details

Entity / site	Dossier owner (role, contact)	Last updated (YYYY-MM-DD)	Period reviewed (e.g., FY2024 or 1.1.–30.6.2025)
EU buyer(s) / consignment ID(s) (if applicable):			

How to use this checklist

- **Scope:** create one dossier per site/node; fill “EU buyer(s) / consignment ID(s)” only when shipment-specific.
- **Cadence:** review quarterly or before EU shipments; update “Last updated” and “Period reviewed”.
- **Evidence:** attach the underlying documents for each tick; cross-reference MSPO materials (if any); retain for five years.
- **Sign-off & control:** dossier owner keeps it current; management signs a legal-compliance declaration; use version control.
- **Gaps & fixes:** if a box cannot be ticked, trigger your remediation SOP, record actions, and note when supply may resume.
- **Handoff:** share this legal dossier with EU buyers together with the technical pack (polygons, chain-of-custody, DDS workflow).

Disclaimer: this checklist helps organise evidence for the EUDR’s “produced in accordance with relevant legislation” limb. It is not legal advice and does not by itself ensure EUDR compliance.

The exact applicability of its items depends on your operations – and the EU operator remains responsible for due-diligence and the Due Diligence Statement. Laws and guidance may change; update this dossier accordingly.

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Core actions this quarter

1. Map your legal footprint

- ☐ Applicable regimes and authorities identified – land, environment, forestry where relevant, labour/OSH, tax/customs, anti-corruption, indigenous rights

2. Prove land-use rights

- ☐ Title or use-right documents on file; boundaries match polygons
- ☐ Estate plans; land rent or quit-rent receipts; conversion approvals if any
- ☐ Indigenous peoples' or customary rights – evidence and any settlement agreements

3. Lock down environmental compliance

- ☐ Approvals and operating licences – current and complete (EIA where thresholds apply)
- ☐ Discharge consents; scheduled-waste registers; monitoring reports; inspection outcomes
- ☐ Single tracker for expiry and renewal dates

4. Document third-party and indigenous rights

- ☐ Stakeholder engagement records and grievance logs with outcomes
- ☐ FPIC – where applicable: notices, attendance, minutes, maps reviewed, signed consents

5. Labour and human-rights compliance

- ☐ Contracts; age/identity checks; payroll and minimum-wage evidence
- ☐ Working-time and overtime records; accommodation and OSH documentation
- ☐ EPF/SOCSSO contribution proofs; zero forced-/child-labour attestations with audit evidence

6. Tax, trade and customs

- ☐ Tax registrations and current filings; levy payments where relevant
- ☐ Export licences or permits; HS classifications; certificates; shipping documents
- ☐ Entity names, addresses and numbers consistent across all records

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7. Anti-corruption controls in practice

- ☐ Risk assessment; policy; training records; gift/hospitality registers
- ☐ Third-party due diligence for agents and contractors; anti-bribery clauses in contracts
- ☐ Functioning whistleblowing channel; central log of investigations and outcomes

Make it stick – contracts, remediation and governance

8. Flow-down and supplier commitments

- ☐ Updated purchase and offtake terms require timely legal documents, audit access and remediation cooperation
- ☐ Signed representations and warranties from upstream suppliers – refreshed periodically

9. Remediation protocol

- ☐ Written procedure to pause or segregate volumes, investigate, correct and document fixes
- ☐ Evidence of corrective and preventive actions; clear criteria for resuming supply

10. Governance, attestations and retention

- ☐ Management legal-compliance declaration prepared for EU buyers
- ☐ Single dossier owner named; responsibilities defined
- ☐ Five-year retention policy adopted to mirror EUDR expectations

Notes

This checklist targets the EUDR’s “produced in accordance with relevant legislation” requirement. Run geolocation, risk assessment/mitigation, segregation and DDS workflows in parallel and cross-reference them in the dossier.

Section 2(40)(c) of the EUDR – forest-related rules directly tied to wood harvesting – applies only if you place wood products on the EU market. Add harvesting and biodiversity prescriptions if relevant.

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