



ICE CoT

INPUT DATA AND METHODOLOGY OVERVIEW

Version: 5 February 2025

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ICE COT DATA AND METHODOLOGY OVERVIEW

The ICE Commodity Traceability Service (“ICE CoT”) is a technology platform that supports traders and operators with their EU Deforestation Regulation (“EUDR”) compliance obligations and the continued trade in compliant cocoa and coffee commodities and products in the EU.

The platform supports the submission, storing, testing and sharing of due diligence information required under the EUDR, and helps users to demonstrate that cocoa and coffee and related products are deforestation-free and lawfully produced when entering the EU market.

There are three key categories of data uploaded by users which are reviewed and validated by the ICE CoT methodologies:

- **Farm Plot Data** – This is details of cocoa and coffee production farm plots, including their geo-location information. Farm plot data is tested against our Farm Plot Data Validation Methodology, developed by Meridia based on its Verify system, using forest mapping data from Space Intelligence along with protected agricultural area information. Farm plot data can be uploaded independently of a product consignment, ideally prior to the harvest and physical flow of commodities, but must be uploaded before any traceability information for a product consignment.
- **Lawful Production and Compliance Risk Data** - This is details of systems and processes for aggregators and others along supply chains which support compliance with applicable local legislation and the mitigation of risks of non-compliance. Lawful production and compliance risk data is reviewed against our lawful production and compliance risk review protocols, developed with the support of KPMG Netherlands. The information will be requested through questionnaires, which can be completed independently of a product consignment but must be completed before uploading any traceability information for a product consignment.
- **Physical Flow Traceability Data** – This is traceability information regarding each product consignment, linking it back to previously submitted farm plot data. Physical flow traceability data includes details of aggregator supply, transport, shipping, warehousing and processing, and is tested against our Physical Flow Traceability Data Validation Methodology. Physical flow traceability data is uploaded when a product consignment is registered to ICE CoT. Certain traceability information regarding systems and processes at traceability control points will also be asked for through questionnaires, which can be completed separately but must be completed before uploading any related product consignment information.

ICE CoT collects and runs a series of reviews and tests on the uploaded data, conducted in accordance with our published methodologies, to support users in showing the relevant product consignment can be traced back to farm plots which are free of deforestation, and that it has been lawfully produced (including being produced outside legally protected areas). The methodologies include checks that the uploaded data is reasonable and consistent. The questionnaires ask whether systems and processes are in place to support traceability and legal compliance. Physical flow traceability data may be supplemented as the product consignment moves through the supply chain, and is subject to further validation against the methodologies. A risk assessment dashboard includes additional information to support users in conducting further risk assessments against specified criteria.

All uploaded data, and all systems, processes, evidence and information confirmed to be present in questionnaire responses, must be available for inspection and verification on request under ICE CoT’s Data Inspection and Verification Programme.

1.1 FARM PLOT DATA UPLOAD

ICE CoT requires farm plot geolocation and related data to be uploaded by a user before uploading any traceability information for product consignments containing or derived from commodities produced on these farm plots. The uploaded farm plot data will be tested by ICE CoT against the Farm Plot Data Validation Methodology and test results returned to the user.

ICE CoT currently supports file upload in GeoJSON format, which is also the format currently required by the EU Information System for due diligence statement uploads. Future support for other formats will be decided upon based on user demand.

Required farm plot input data includes:

- **ProducerCountry** - 2 letter country code from ISO 3166-1 alpha-2. For example, “CI” for Côte d’Ivoire or “BR” for Brazil. Must match one of the values within the list of supported countries.
- **Commodity** - “Coffee” or “Cocoa”.
- **CTOFarmerID** - A unique identifier for the farmer, assigned by the user. Multiple farm plots may be linked to the same farmer.
- **CTOPlotID** - A unique identifier for the farm plot, assigned by the user. This field should be unique for each given ProducerCountry and Commodity.
- **DateofMapping** - As details of a plot may change over time, this determines which version of the farm plot was current on a particular date.
- **Geometry** - Either a polygon defining the outline/border of the plot or a point indicating a physical location within the farm plot. If a point is specified, the farm plot area must also be specified. Plots over 4ha must be specified as polygons.
- **Area** - The area of the farm plot, in hectares. Where the geometry is a point, Area is required and must be no more than 4ha.

Optional data may also be added including **ProducerName**, **NationalFarmerID**, **NationalPlotID**, **AggregatorIDs**, **DataProvider**, and **ProductionPlace**.

Underlying information and documentation to evidence the uploaded data is required to be available for inspection and verification.

Farm plot data is not shared with a buyer or with other users except that: Geometry (plot polygon or geolocation point) is always shared with a buyer until due diligence statement creation, after which it is not required to be shared; other farm plot data may be shared with a buyer at the seller’s option.

1.2 FARM PLOT DATA METHODOLOGY TESTS

Farm plot data is subject to several tests under the Farm Plot Data Validation Methodology, including basic data consistency and reasonability tests, and checks for deforestation and protected area proximity and overlaps. All required data fields must be supplied. Where farm plot data fails any test, that farm plot may not be used as an eligible production plot in respect of any product consignment traceability data. Test failures may be challenged by a user if the farm data is believed to be compliant. In case of upload errors, the data can be corrected and re-uploaded. Some farm plot data tests (e.g. “Farm is extremely large”) have reasonability thresholds which may vary by country.

ICE CoT Farm Plot Data Validation Methodology test methods and thresholds are subject to continuous review and may be updated, removed or added to.

Current tests include:

Basic geometry tests for polygons:

- Farm has too few boundary vertices.
- Farm has self-intersecting boundary segments.
- Farm plot polygon contains holes.
- Farm plot polygon is not closed.

Deforestation, protected area and plot size tests:

- Farm overlaps with deforestation.
- Farm overlaps with forest.
- Farm overlaps with protected area.
- Farm plot is recorded as a geopoint with estimated size greater than 4ha.
- Geopoint too close to deforestation.

Reasonability tests:

- Farmer has implausibly high number of farms.
- Farm plot is distant from farm plots with the same Farmer ID.
- Farm plot mapping date is far in the past.
- Farm plot overlaps with other farm plot(s).
- Farm plot is duplicated with same Farmer ID.
- Farm plot is duplicated with different Farmer ID.
- Farm plot has a very unusual shape.
- Farm plot boundary has spikes.
- Farm plot is extremely large.
- Farm plot is outside of country boundary.
- Farm plot overlaps built-up area.
- Farm plot overlaps water body.
- Farm plot location time-series mismatch.
- Inconsistent farmer data.

1.3 LAWFUL PRODUCTION AND COMPLIANCE RISK DATA

EUDR-compliant supply chains are expected to have in place internal management systems which include documented procedures and processes for aggregators and others within supply chains to ensure compliance with applicable legal and compliance risk mitigation requirements, and to identify and confirm on which farm plots any commodities supplied by aggregators were originally produced.

ICE CoT uses questionnaires to collect and analyse information regarding these systems, procedures and processes as they relate to making sure: (i) the commodities and related products contained in or used to make the product consignment were lawfully produced; (ii) as required, appropriate compliance risk mitigation was exercised; and (iii) each product parcel supplied by an aggregator contains or is

made only from commodities produced on some or all the farm plots associated with the product parcel within the provided physical flow traceability data, and no other farm plots.

Two types of questionnaire are used:

- the registration questionnaire collects information regarding the list of aggregators and the types of internal management systems for aggregators and supply chains for each production country, along with information regarding supply chain communication, grievances and compliance violations; and
- the lawful production and compliance risk questionnaire asks how these systems ensure compliance with the applicable legislation for each specified lawful production topic in each production country and how remaining risks are mitigated.

Underlying systems, information and documentation to evidence the answers to the questionnaires must be available and may be inspected and verified.

Only aggregators (and related supply chains) with fully and satisfactorily completed questionnaires are eligible to be identified in the physical flow traceability input data for any product consignment.

- **Registration Questionnaire**

The Registration Questionnaire is a standardised questionnaire designed to help assess whether a user has reliable systems and processes in place for aggregators and related supply chains to ensure compliance with, and provide reliable information related to, lawful production of commodities, including whether and how these systems are audited. It also seeks to obtain information about good communication regarding EUDR requirements and effective grievance management procedures, along with information regarding complaints, compliance breaches and legal proceedings

- **Lawful Production and Compliance Risk Questionnaire**

The Lawful Production and Compliance Risk Questionnaire is a detailed and adaptable questionnaire designed to help assess how the internal management systems ensure compliance with applicable local laws and mitigate residual risks of non-compliance with the EUDR. Users must confirm whether they have internal management systems in place covering all aggregators (and the related supply chains) in each production country to collect, verify and risk assess information which shows compliance with relevant legislation regarding each applicable lawful production topic, including the specific laws identified by local legal and sustainability experts for each lawful production topic as applicable for each production country. Lawful production topics include land use rights, environmental protection, third-party rights and Free, Prior, and Informed Consent (FPIC), labour and human rights, and tax, anti-corruption, trade, and customs regulations.

Where the internal management system reveals a risk of non-compliance with relevant legislation, users must confirm they have implemented the required mitigation measures specified regarding each lawful production topic. If a user does not confirm an internal management system is in place for each lawful production topic, or does not confirm that the required mitigation measures have been adopted, the aggregators and their related supply chains are not eligible to be referenced in a product consignment within ICE CoT.

1.4 PHYSICAL FLOW TRACEABILITY DATA UPLOAD

A “product consignment” is a specified quantity of a single physical cocoa or coffee commodity product type (e.g. cocoa beans, cocoa butter, coffee beans) whose details are uploaded onto ICE CoT. A product consignment may be uploaded at any point in the supply chain after it has been supplied by an aggregator. Each uploaded product consignment will require data regarding specified events between

the aggregator supply and the point at which the product consignment is uploaded, including any transport, storage and processing of the commodities and product along the way.

The sequence of submitted event data can be used to track the commodities and products that comprise or are used to make the product consignment through the physical supply chain, back to the aggregators from which the relevant commodities or related products were sourced, and identifying the farm plots where the commodities were produced (a “traceability tree”). Each separate quantity of a single physical commodity or related product at each event along the traceability tree, starting with the initial supply by an aggregator, is called a “product parcel”.

The event types supported by ICE CoT include:

- **CreateParcel** – Sourcing of a product parcel from an aggregator. The start of every traceability tree, this provides the direct link to a list of eligible farmers identified in the farm plot data. Every subsequent event ultimately links back to a CreateParcel event.
- **Transport** – Movement of a product parcel, for example by truck.
- **Warehousing** – Storage of product parcel at a warehouse or other facility.
- **Operation** – Specified action carried out on a product parcel. For example, washing, processing cocoa beans into liquor, butter or powder, milling, grading or roasting at a factory, the splitting or merging of a product parcel/product parcels, and any ownership changes that occur independently of other events such as Transport events or Shipping events.
- **Shipping** – Movement of product between countries associated with a bill of lading document. For the Shipping event, it is a requirement to upload selected details from the Bill of Lading document, and a scanned copy of the document.

Every event in the traceability tree for a product consignment must be identified by a numeric event ID, which determines the sequence in which events occurred. Events have lists of inputs and/or outputs defining the commodity or product acted on or produced by the event. The weight of each product parcel must be known at every stage in the supply chain. The set of data required to be provided in respect of each event in a traceability tree includes the fields specified below.

- **EventID** - A unique identifier of the event, assigned by the user. Used for sequencing.
- **EventDate** - Date on which the event occurred.
- **Country** - Country in which the event occurred.
- **ToCountry** - Country in which a transportation event ended (if a Transport event moves product from one country to another)
- **CreationType** - Indicates whether product was sourced from aggregators or whether a pre-29 June 2023 parcel is being created.
- **AggregatorDocumentID** - Identifying reference of a contract, waybill, or other relevant document connecting the aggregator with the purchase or transport from that aggregator.
- **OperationType and Description** - The type of operation being carried out e.g. cleaning. ICE CoT will specify a list of valid values with a free-text option.
- **ContinuousProcess** - Where continuous processing occurs, alternative tests apply as weight-testing of inputs and outputs cannot be applied on an event-by-event basis.
- **AggregatorID** - A unique identifier for the aggregator that the product has been sourced from. Must match an eligible aggregator.
- **CropYear** - Specified in YYYY/YY format e.g. ‘2025/26’.

- **FarmerPurchase [List]** - List of farmers that provided product to the specified aggregator. If no farmers are listed ICE CoT, all farmers associated with the aggregator are listed as contributing to the parcel.
- **CTOFarmerID** - Each farmer providing product to the aggregator is referred to by the CTOFarmerID provided when details of the farmer were uploaded to ICE CoT.
- **FacilityID** - A unique identifier for a warehouse or processing facility such as a factory where product is stored or processed. Must match an eligible facility.
- **InputParcels [List]** - List of one or more input parcels that the event is consuming.
- **ParcelID** - A unique identifier for a product parcel produced by an event. Where an event does not change a product parcel, the ParcelID does not change.
- **OutputParcels [List]** - List of one or more output parcels that the event is producing. Only required if the Output Parcel is different to the Input Parcel.
- **Owner Name, Owner Address, Owner Email** - identifies the owning entity at the relevant event.
- **HSCode** - Corresponds to the codes listed in Annex I of the EUDR
- **ProductType** - Specific type of product within the HSCode, e.g. 'roasted arabica beans'. ICE CoT will specify a list of valid values.
- **B/L Fields and [Associated Document]** - Scan of bill of lading and specified information fields.

Optional data may also be added including **OperationReference**, **NetWeight**, **DateOfPurchase**, **DocumentRef**, **Product Description**, and additional **B/L Fields**.

Underlying systems, information and documentation to evidence the uploaded data are required to be available for inspection and verification.

Physical flow traceability data is not shared with a buyer or with other users except that: details regarding the immediate seller are always shared with a buyer; bill of lading information is shared with a buyer until due diligence statement creation, after which it is not required to be shared; other physical flow traceability data may be shared with a buyer at the seller's option.

ICE CoT currently supports file upload in a JSON format text file with a defined set of objects and fields.

1.5 PHYSICAL FLOW TRACEABILITY DATA METHODOLOGY TESTS

ICE CoT will apply consistency and reasonability tests to the physical flow traceability data under the Physical Flow Traceability Data Validation Methodology. All required data fields must be supplied.

ICE CoT Physical Flow Traceability Data Validation Methodology test methods and thresholds are subject to continuous review and may be updated, removed or added to.

- The linkage of events and product parcels must form a consistent sequence in time.
- Event inputs and output product types must be consistent for the specified event type.
- Event inputs and output product weights must be consistent with the specified event type.
- Each identified aggregator must be from eligible list.
- Each identified facility must be from eligible list.
- Data relating to bills of lading will be checked against the document scan.

1.6 PHYSICAL FLOW TRACEABILITY QUESTIONNAIRE

EUDR-compliant supply chains are expected to have in place systems and processes for warehousing or operational facilities to ensure compliance with applicable traceability requirements.

ICE CoT uses questionnaires to collect and analyse information regarding these systems and processes as they relate to making sure each product parcel is tracked through each warehousing and operational facility to ensure the identity of the input and output product parcel follows and corresponds with the provided physical flow traceability data, and that no mixing or contamination with unidentified product has occurred.

Underlying systems, information and documentation to evidence the answers to questionnaires must be available and may be inspected and verified.

Only warehousing and operational facilities with fully and satisfactorily completed questionnaires are eligible to be identified in the physical flow traceability data for any product consignment.

1.7 RISK ASSESSMENT PROCESS

ICE CoT's risk dashboard includes information relating to specified risk criteria and identifies how users can use this as part of their EUDR risk assessment processes regarding a product consignment. The information includes:

- ICE CoT Farm Plot Data Methodology outcome.
- ICE CoT Physical Flow Traceability Methodology outcome.
- Lawful Production and Compliance Risk Questionnaire outcome.
- European Commission production country risk assignments and expert group conclusions.
- Data regarding the presence of forest and prevalence of deforestation in the production country (Space Intelligence and EU Observatory maps).
- Public resources information regarding corruption perceptions, regulatory quality, rule of law, human rights, conflicts and sanctions in the production country.
- Data regarding indigenous peoples risks.

1.8 THIRD-PARTY DESK AND FIELD-BASED INSPECTION PROGRAMME

ICE CoT will use a risk-based, third-party desk and field-based inspection and verification programme to support the data collection and validation methodology processes described above.

All uploaded data, and all systems, processes, evidence and information confirmed to be present in questionnaire responses, must be available for inspection and verification on request to check its completeness, truthfulness and accuracy.

Data checks and control points will be identified regarding the ICE CoT data across farm plots, lawful production and compliance risk systems and processes, and physical flow traceability for product consignments. Risk-based samples will be subject to field and desk-based inspection and verification processes in accordance with ICE CoT's Data Inspection and Verification Programme.

1.9 INFORMATION AND DISCLAIMERS

The ICE CoT platform is provided by ICE Benchmark Administration Limited (“IBA”) to support users with their due diligence obligations under the EU Deforestation Regulation (Regulation (EU) 2023/1115, as amended by the Regulation 2024/3234, “EUDR”). The ICE CoT platform collects input data and uses the methodologies described in this document to do so.

Users of ICE CoT, including any operators or traders with obligations under the EUDR, remain solely responsible: (i) for the commodities and products that they supply or acquire and any data or information associated with such commodities and products, including any data or information submitted to ICE CoT; (ii) for the status of such commodities and products as being deforestation-free and lawfully produced; and (iii) for the compliance of such commodities and products with applicable EUDR requirements, including in each case regarding their production, transfer, storage, processing, import, and export, and for all transactions, record-keeping and reporting. IBA has no responsibility whatsoever for such commodities and products, or for any such status or compliance.

The ICE CoT platform outputs are based upon: (i) inputs of data provided by ICE CoT users, who are and remain responsible for the accuracy and completeness of the data they submit to ICE CoT; and (ii) other third-party reference data. ICE CoT applies reviews and tests to the input data submitted by ICE CoT users in accordance with its methodologies. While the input data collected and these reviews and tests have been designed to support users in identifying data that may be inaccurate, incomplete, or which indicates commodities and products have been produced within deforested areas or in breach of applicable local laws, the ICE CoT platform outputs are not and should not be regarded as a conclusive and definitive confirmation that the input data was accurate and complete and that the relevant commodities and products are, or are not, deforestation-free and lawfully produced. There can be no guarantee that the reviews and tests will not validate inaccurate or incomplete data, or commodities and products from farms within deforested areas or that have not been produced lawfully, or that the reviews and tests will not reject accurate and complete data, or commodities and products from farms outside deforested areas and that have been produced lawfully. ICE CoT is not liable for any input data that may be submitted to ICE CoT, including any which may be inaccurate, incomplete, false or submitted fraudulently.

None of ICE CoT, the data collected or the methodologies used by it can definitively establish or confirm that any commodity or product: (i) has been produced on land that is deforestation-free and has been lawfully produced; or (ii) is compliant with the EUDR, or that all due diligence required by the EUDR has been exercised.

ICE CoT is designed to support users in their own submission of due diligence statements to the EU information system through the ICE CoT platform. ICE CoT is not an authorised representative under the EUDR for this purpose and does not act as an agent or other service provider for the purposes of due diligence statement submission. Each user of ICE CoT remains responsible for the submission of any due diligence statement to the EU information system and for the compliance with the EUDR of any commodities or products referred to in any due diligence statement submitted through ICE CoT.

IBA does not provide recommendations regarding commodities or products, or legal, financial, tax, or investment advice on any matter. None of the information available from ICE CoT should be taken as constituting a recommendation or legal, financial, tax, or investment advice.

ICE CoT is an unregulated product and in particular is neither an index nor a benchmark for the purposes of the EU Benchmarks Regulation (Regulation 2016/1011) or that regulation as enacted in the UK under the European Union (Withdrawal) Act 2018 (UK Benchmarks Regulation) nor is it an ESG rating for purposes of the ESG Ratings Regulation (Regulation 2024/3005) or any similar law. Accordingly, none of the regulatory protections of the EU Benchmarks Regulation, UK Benchmarks Regulation and ESG Ratings Regulation apply to ICE CoT, the inputs submitted to it, the outputs it provides or the methodologies it uses.

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Submitted data may be used in ICE CoT's methodologies and this input data and the outputs of the methodologies may be shared, including with other users, in accordance with ICE CoT's policies and procedures. All information and data submitted to ICE CoT, and all underlying data, documentation, evidence, systems and processes, is required to be made available for inspection and verification in accordance with ICE CoT's inspection and verification programme and if requested by any national competent authority.

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