



ICE Commodity Traceability – An EUDR Solution

26th June 2025

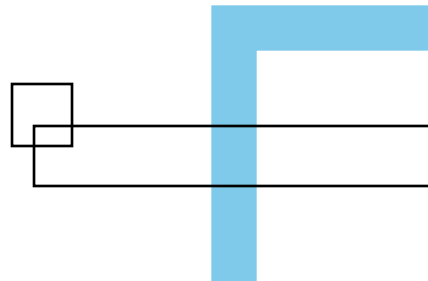
Toby Brandon, COO, ICE Benchmark Administration

Tom Evans, Senior Director, Legal and Compliance , ICE Benchmark Administration

Professor Ed Mitchard, Co-Founder and Chief Scientist, Space Intelligence

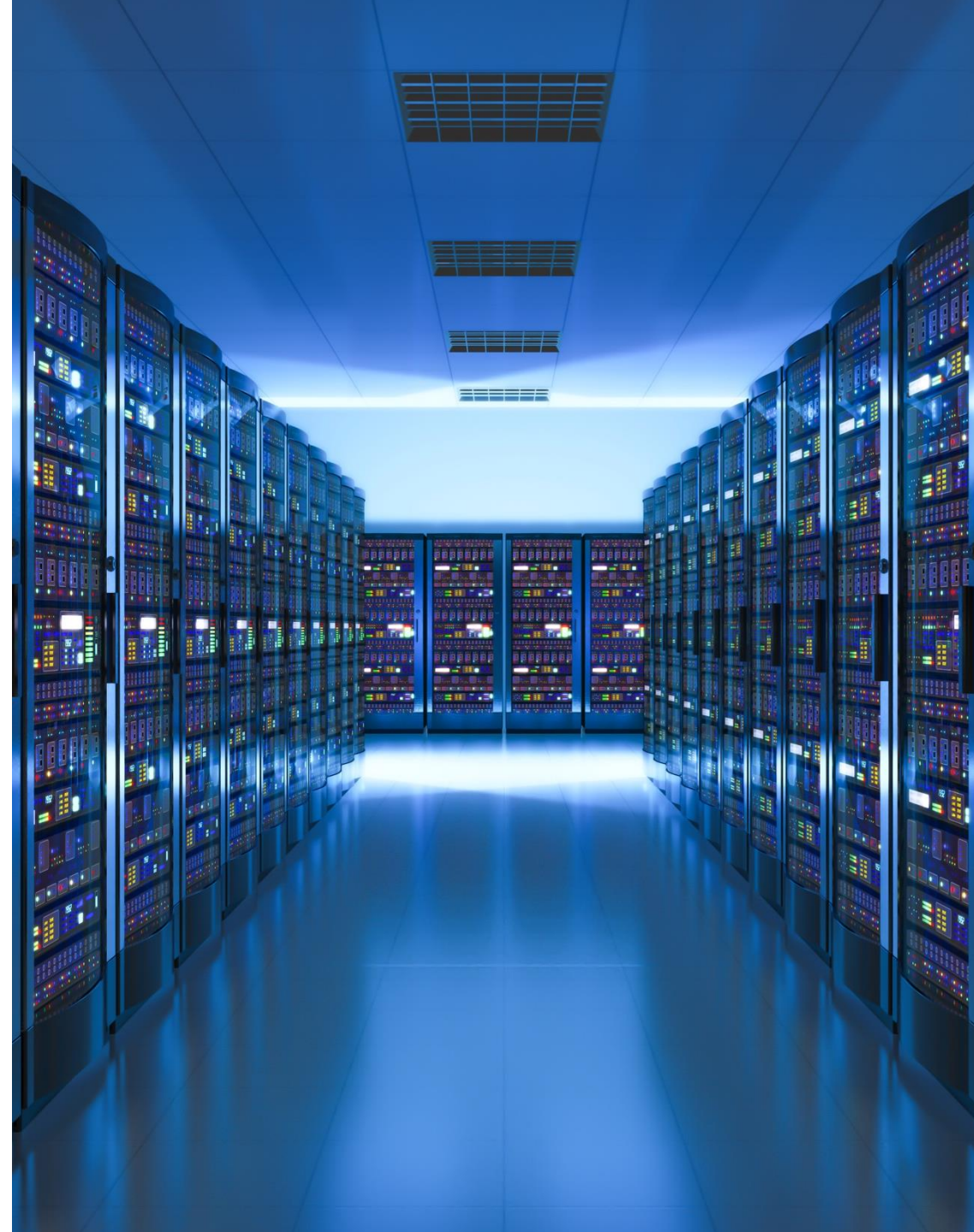
Thomas Vassen, Co-Founder and CEO, Meridia

Mabel Dortmans, Senior Consultant Sustainable Supply Chains, KPMG



About ICE and IBA

- Part of the ICE group, a leading provider of financial technology and data services and operator of a number of exchanges and clearing houses globally
- ICE's benchmark Cocoa, London Cocoa, Coffee C® and Robusta Coffee futures and options contracts are the largest markets in the world to trade cocoa and coffee
- ICE Benchmark Administration ("IBA") is one of the world's most experienced administrators of regulated benchmarks and financial and commodity market data services
- We offer the highest standards of technology, data management, governance and oversight

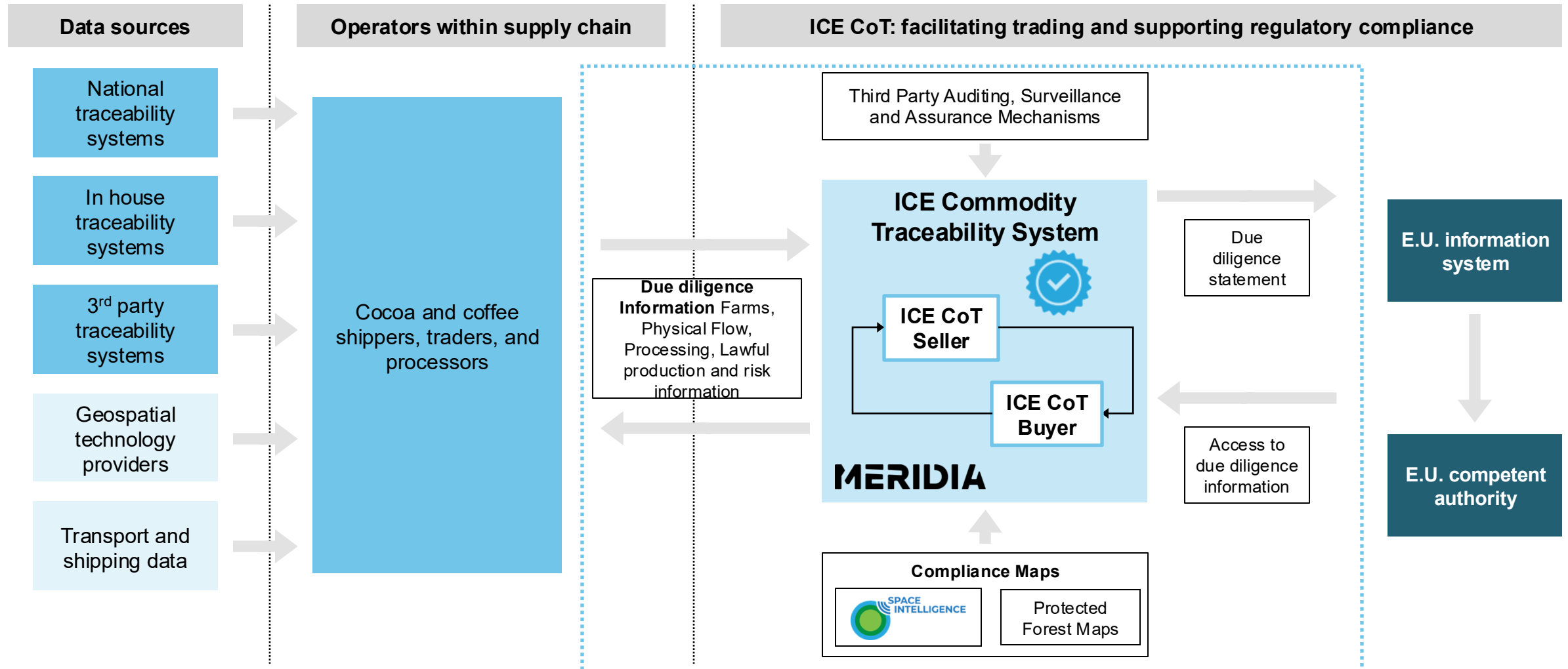




Objectives

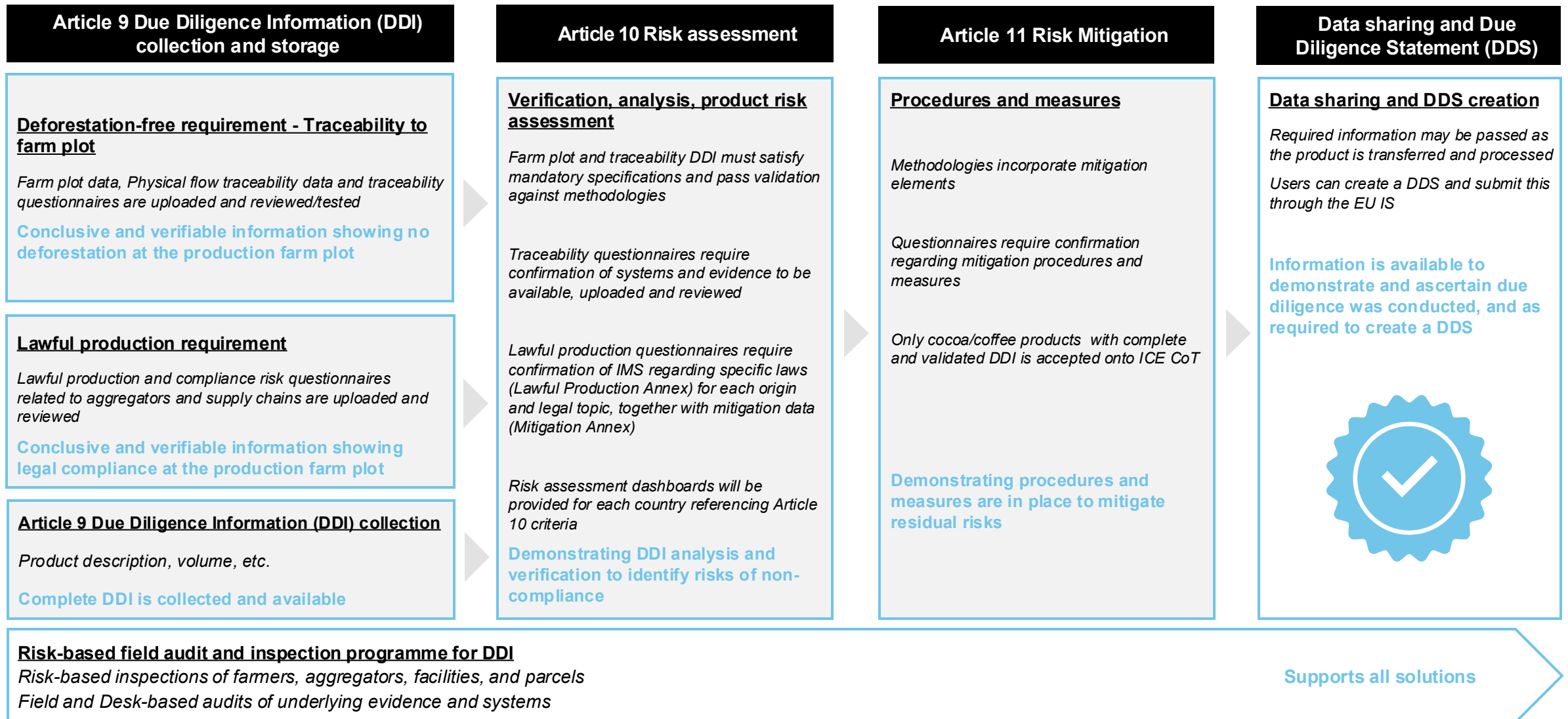
- Support collection, storing, testing and sharing of Due Diligence Information (DDI)
- Assist users in demonstrating and ascertaining that cocoa products are deforestation-free and lawfully produced when entering the EU market, to support trade
- Apply public, transparent, review and validation methodologies to specified input data
- Designed to facilitate conformance with Articles 3 and 8, including traceability to the aggregator and the production farm plot
- Support creation and submission of DDS
- Database of information, and requirements to make underlying evidence and systems available for inspection (including by NCAs)

Supporting operators with EUDR compliance obligations



Supporting operators with EUDR compliance obligations

ICE CoT platform solutions for due diligence

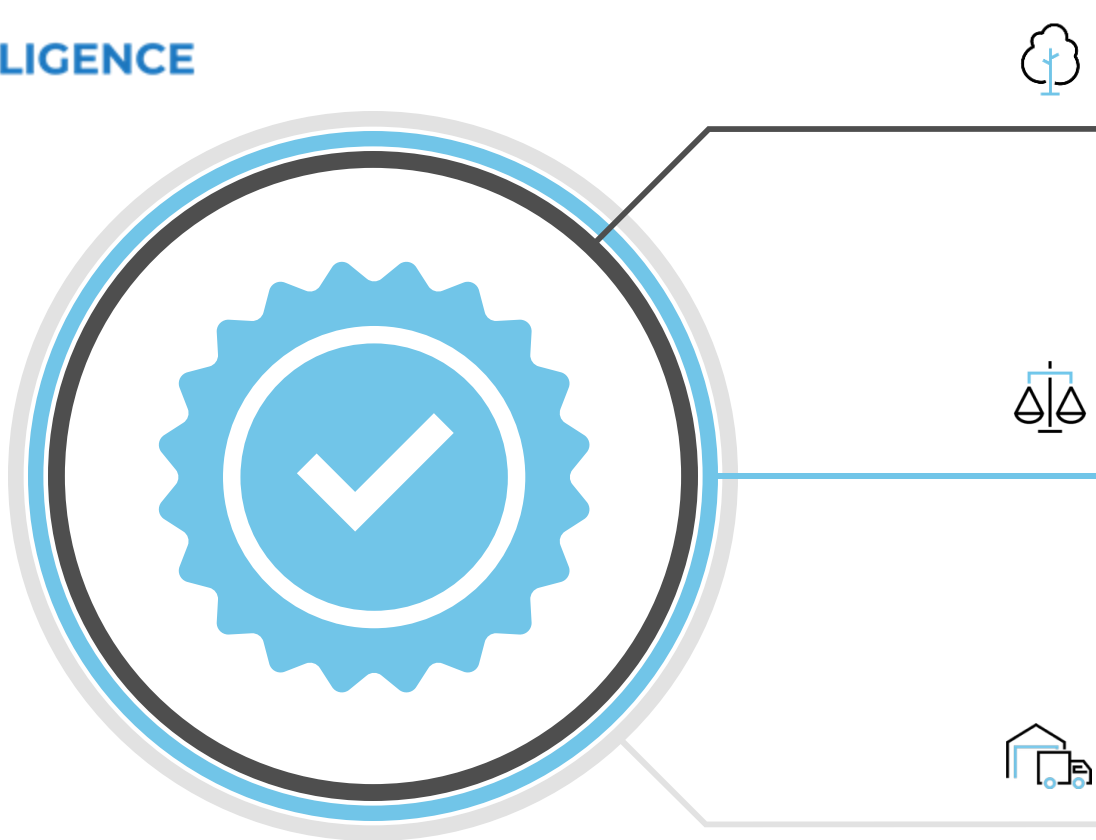


ICE CoT data components

Three key data components are collected and tested against our methodologies



MERIDIA



Farm plot data

Specification and validation methodology, based on Meridia Verify™ Farm, using Space Intelligence mapping data and protected areas layers, designed to test whether plots are deforestation-free.



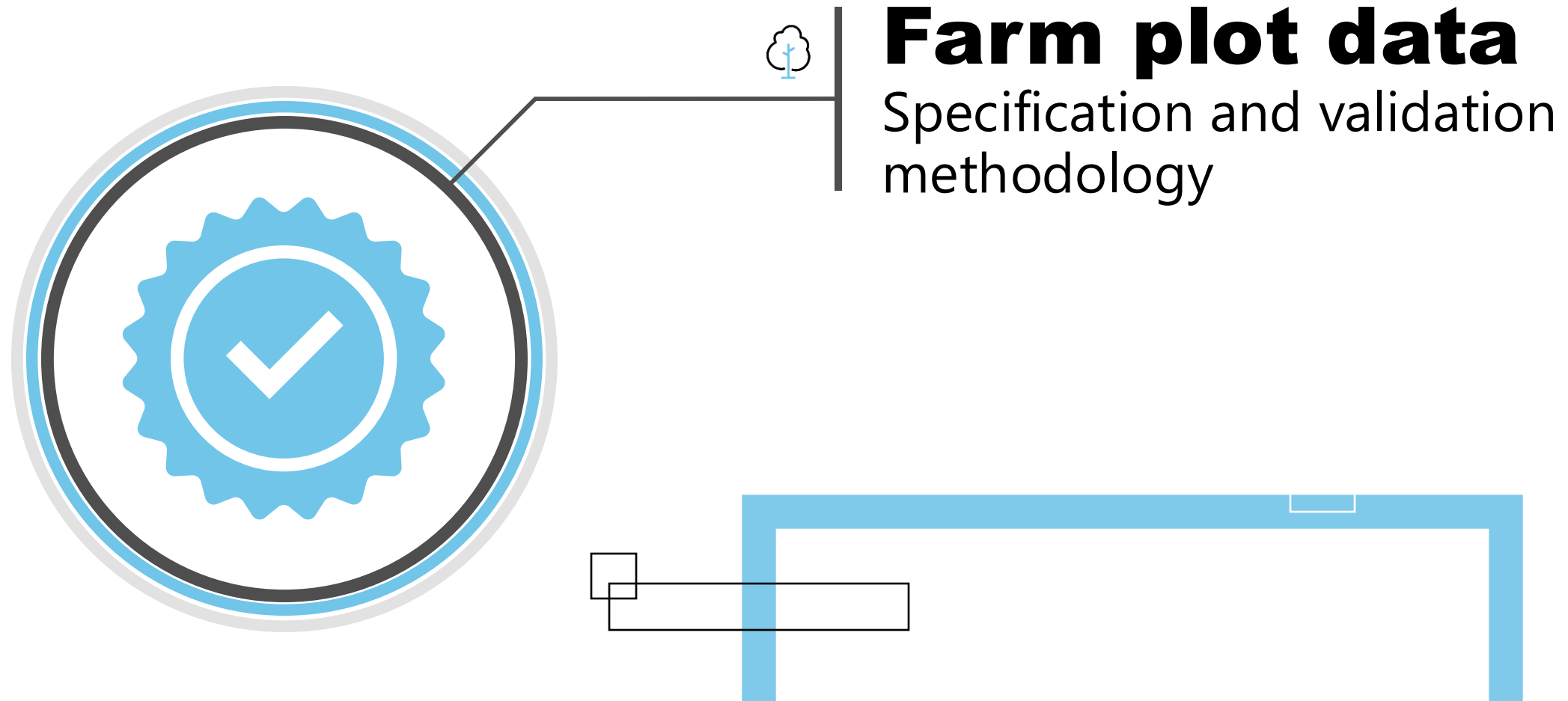
Lawful production and compliance risk data

Questionnaires and review process, developed with the support of KPMG Netherlands, designed to assess auditable data on internal management systems within supply chains



Physical flow traceability data

Specification and validation methodology, designed to trace each quantity of product to the aggregator and production farm plots, supported by questionnaires to assess systems at aggregators, facilities and transport points



Farm plot and aggregator data inputs



Farm plot information

- Country
- Commodity
- Farmer ID
- Plot ID
- Date of Mapping
- Polygon/Geo-Point + Plot Size Estimate



Aggregator information

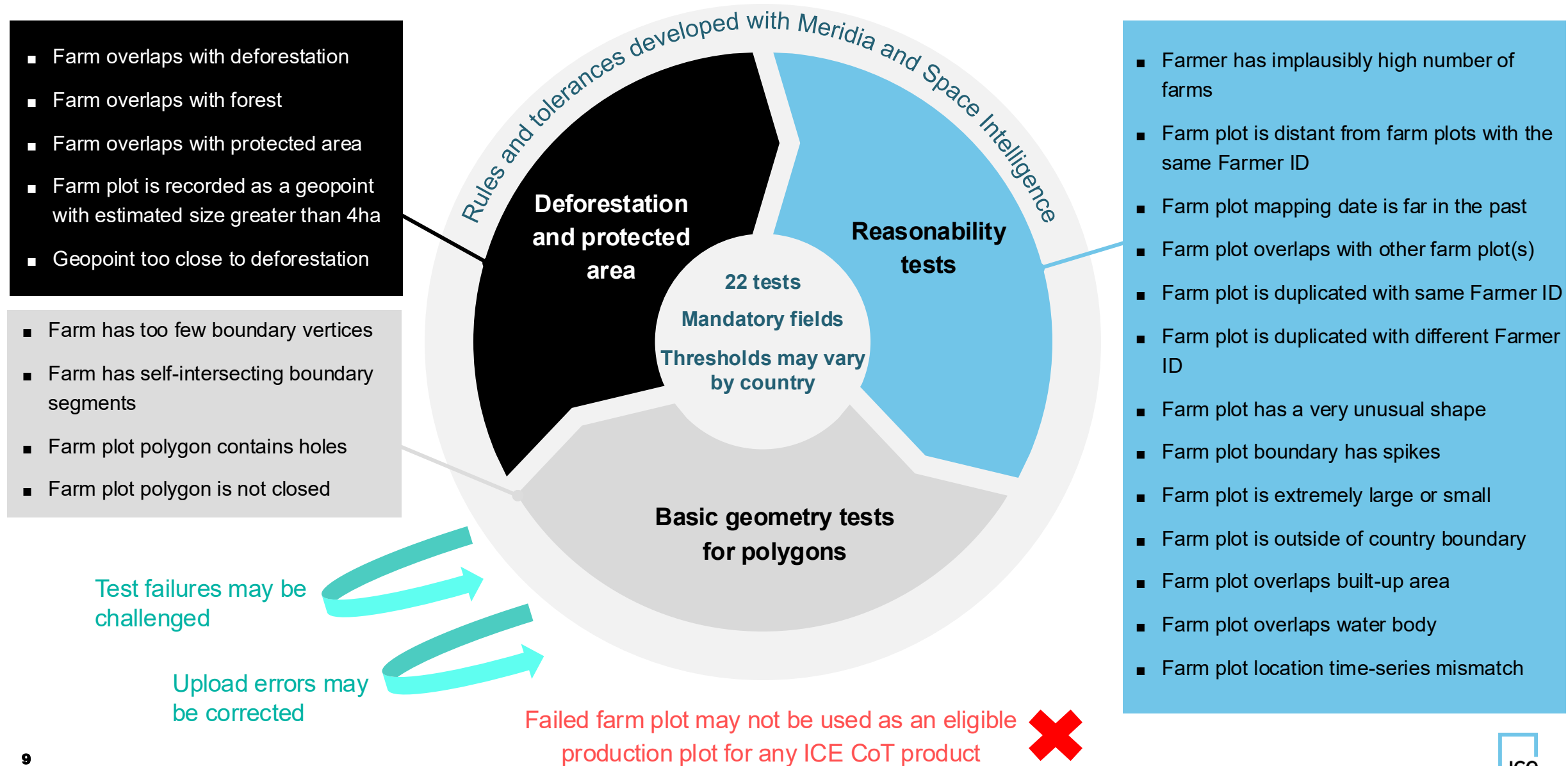
- Country
- Commodity
- Aggregator Name and Address
- Aggregator ID
- Aggregator Geo-Point(s)
- Internal Management System (IMS) category
- Independent Audit Verified (yes/no)
- Third Party Certification (where available)
- Most Recent Audit Date



ICE CoT farm methodology

- ICE CoT tests these farm plot data inputs using the Farm Plot Data Methodology
- Tests against:
 - Best-in-class Space Intelligence forest and deforestation maps
 - Protected areas layers in multiple origins
- Multiple validation checks for data integrity and plausibility
- Reports outcome of checks by test and reason for failure
- Valid plots are eligible for reference in an ICE CoT product parcel

ICE CoT farm plot data methodology tests





Dashboard

Legal Questionnaire

Aggregators

Aggregator Data Files

Search Aggregators

Facilities

Facility Data File

Search Facilities

Farm Plots

Farm Plot Files

Deactivation Plot Files

Search Plots

Challenges

Upload Farm Plot File

Outline Plot File

Parcels

Parcel Files

Search Parcels

Upload Parcel File

ICE Badge Lookup

Transfers

Incoming Transfers

Outgoing Transfers

Transfer Parcel

Downloads

Farm Plot Files

Farm Plot File- 770

File Details

File Name VietnamCoffee geojson

Status COMPLETE

Country VN

Commodity COFFEE

Uploaded By aocuser1

Last Updated Time 2025-04-29 13:13:11

Key Statistics

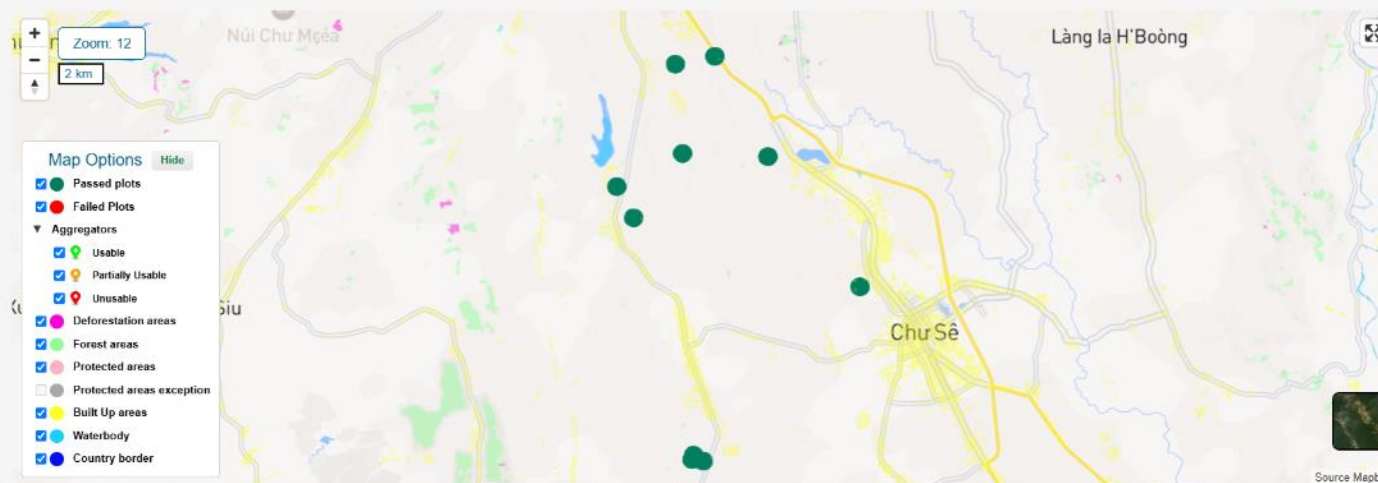
Total Farmers 10

Total Plots 10

Passed 10

Failed 0

Skipped 0



Plots

☒ Show files from all users in Group

CTO Plot ID	Date Of Mapping	CTO Farmer Id	Plot Record State	Latest Plot Status	More Details	Aggregator IDs	Aggregators Valid	Error Code	Map Type	Producer Name	Area
CTOPlotID1231	2022-01-01	CTOFarmerID1231	Created	Passed	View	VNAgg	No		Polygon	CSE-CSE-0083	4.011
CTOPlotID12310	2022-01-01	CTOFarmerID12310	Created	Passed	View	VNAgg	No		Polygon	CSE-IHL-0025	4.012
CTOPlotID1232	2022-01-01	CTOFarmerID1232	Created	Passed	View	VNAgg	No		Polygon	CSE-CSE-0085	4.011
CTOPlotID1233	2022-01-01	CTOFarmerID1233	Created	Passed	View	VNAgg	No		Polygon	CSE-CSE-0086	4.012
CTOPlotID1234	2022-01-01	CTOFarmerID1234	Created	Passed	View	VNAgg	No		Polygon	CPU-IHR-0172	4.011
CTOPlotID1235	2022-01-01	CTOFarmerID1235	Created	Passed	View	VNAgg	No		Polygon	CSE-IGL-0028	4.011
CTOPlotID1236	2022-01-01	CTOFarmerID1236	Created	Passed	View	VNAgg	No		Polygon	CSE-IGL-0029	4.011

EUDR with Audit-Grade Mapping Data: 26 June 2025

Prof Ed Mitchard

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Why make custom maps for ICE CoT?



What were the alternatives?

- Could have used open access maps, e.g.
 - ✂ Hansen et al/Global Forest Change (Uni Maryland / Google)
 - ✂ EU Joint Research Centre Tropical Moist Forest
 - ✂ EU Global Forest Cover for 2020 V2
- BUT:
 - ✂ Fundamentally **not accurate enough**
 - For shade-grown crops (coffee/cocoa) they incorrectly map crop-growing areas as forest in 2020
 - Deforestation not tuned to EUDR definition (5m tree height, 10% canopy cover, 0.5 ha)
 - Too coarse resolution (30m not 10m)

Country	Vietnam	Côte d'Ivoire
Number farms tested	12 795	52 115
Space Int % failure rate	0.16%	1.56%
EU GFC % failure rate	20.4%	21.0%

About Space Intelligence



We provide the **highest accuracy nature data** to bring **integrity and trust** to forest conservation and restoration initiatives

- **3 billion hectares** of land mapped over 53 countries
- Selected as sole NBS data provider for **ICE CoT**
- Selected as sole NBS data provider for **Apple's \$400M Restore Fund**
- Selected as Top Innovator by **World Economic Forum UpLink**
- Backed by science: **>120 peer-reviewed articles** on landcover and biomass mapping
- **Largest team of forest satellite** mapping experts in the world

Trusted by



equinor



FOREST
CARBON



EVER
LAND

Space Intelligence Founders



Dr Murray Collins
CEO, Founder



Prof. Ed Mitchard
Chief Scientist, Founder



UNIVERSITY OF
OXFORD



THE UNIVERSITY
of EDINBURGH

Imperial College
London



TECH NATION



BayesCentre

TIME

 SIGN UP FOR OUR IDEAS NEWSLETTER



Last week at Climate Week NYC, held September in parallel with the United Nations General Assembly, TIME's climate action division, TIME CO2, convened a roundtable to understand what was motivating companies to continue investing in nature, and what barriers keep them from increasing their investments. The roundtable included senior sustainability executives from companies such as Amazon, Amex, Airbnb, GSK, HP, Ingka Group (IKEA), L'Oreal, Mastercard, Rabobank, Salesforce, Unilever, and VMware, and NGOs including Conservation International and The Nature Conservancy. It was sponsored by the American Forest Foundation, Climate Impact Partners, Pachama, Space Intelligence, and Sylvera.



At the roundtable, we learned that companies found that their investments in ecosystem conservation and restoration in operating areas have not just reduced supply-chain emissions but also generated tangible business value. Improving water security, potential for financial returns, and overall business resilience were cited as particularly important reasons for nature investments. These investments are often additional to other corporate initiatives focused on emissions reductions, such as carbon pricing, supplier emissions requirements, renewable energy procurement, and logistics fleet electrification. In the absence of universal climate regulation, these voluntary actions are necessary.

Key publications

Over 100 publications on satellite mapping



- **E.T. Mitchard et al.**, 2009. Using satellite radar backscatter to predict above-ground woody biomass: A consistent relationship across four different African landscapes. *Geophysical Research Letters*, 36(23).
- **M.B Collins & E.T Mitchard**, 2017. A small subset of protected areas are a highly significant source of carbon emissions. *Scientific Reports*, 7(1), pp.1-11.
- **P. Nieto-Quintano & E.T Mitchard et al.** 2018. The mesic savannas of the Bateke Plateau: carbon stocks and floristic composition. *Biotropica*, 50(6), pp.868-880.
- **Mitchard, E.T.**, 2018. The tropical forest carbon cycle and climate change. *Nature*, 559(7715), pp.527-534.
- **M.B Collins & E.T Mitchard**, 2015. Integrated radar and lidar analysis reveals extensive loss of remaining intact forest on Sumatra 2007–2010. *Biogeosciences*, 12(22), pp.6637-6653.
- **E.T Mitchard et al.**, 2017. Age, extent and carbon storage of the central Congo Basin peatland complex. *Nature*, 542(7639), pp.86-90.
- **E.T Mitchard et al.**, 2019. Congo Basin peatlands: threats and conservation priorities. *Mitigation and Adaptation Strategies for Global Change*, 24(4), pp.669-686.
- Nomura, K & **E.T. Mitchard**. 2018. Using Sentinel-2 to map small plantations in complex forest landscapes. *Remote Sensing* 10(11), 1693.
- **E.T Mitchard et al.**, 2014. Markedly divergent estimates of Amazon forest carbon density from ground plots and satellites. *Global Ecology and Biogeography*, 23(8), pp.935-946.
- **E.T Mitchard et al.**, 2017. Understanding 'saturation' of radar signals over forests. *Scientific Reports*, 7(1), pp.1-11.
- **E.T Mitchard et al.**, 2013. Woody encroachment and forest degradation in sub-Saharan Africa's woodlands and savannas 1982–2006. *Philosophical Transactions of the Royal Society B: Biological Sciences*, 368(1625), p.20120406.
- **E.T Mitchard et al.**, 2013. A novel application of satellite radar data: measuring carbon sequestration and detecting degradation in a community forestry project in Mozambique. *Plant Ecology & Diversity*, 6(1), pp.159-170.
- **M.B Collins & E.T Mitchard et al.**, 2012. Mapping tropical forest biomass with radar and spaceborne LiDAR in Lopé National Park, Gabon: overcoming problems of high biomass and persistent cloud. *Biogeosciences*, 9(1), pp.179-191.
- **M.B Collins & E.T Mitchard et al.**, 2018. Extending the baseline of tropical dry forest loss in Ghana (1984–2015) reveals drivers of major deforestation inside a protected area. *Biological Conservation*, 218, pp.163-172.

AI & Engineering team:

Created nature mapping data engine



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Science & ecology team:

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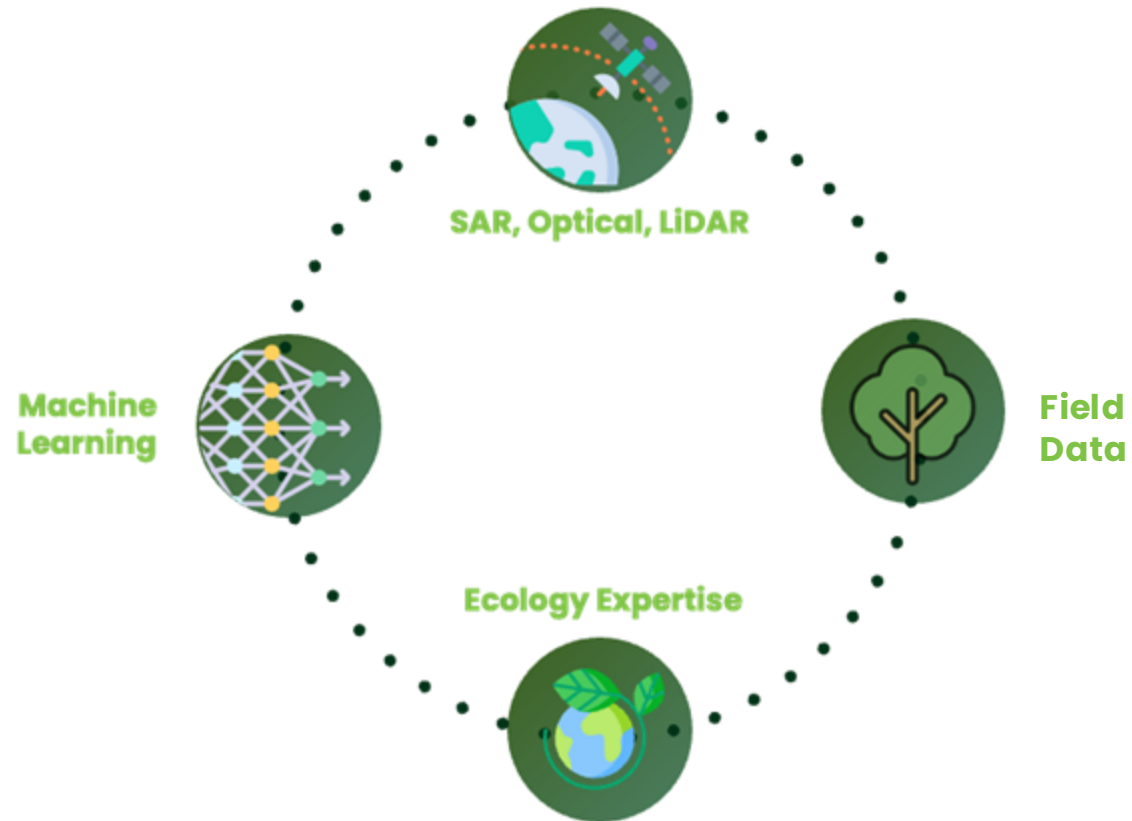
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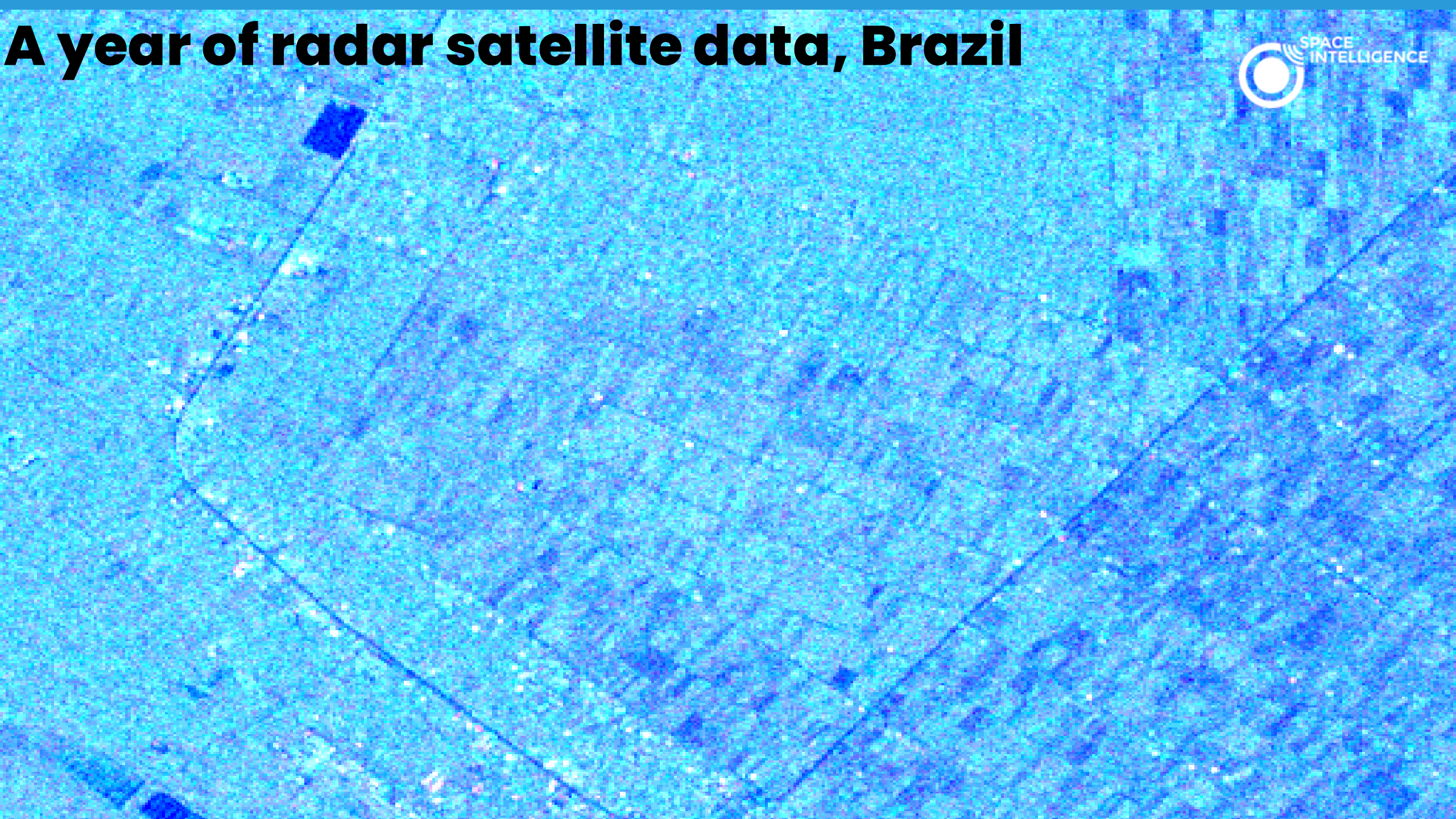
How we make EUDR maps



A year of optical satellite data, Brazil



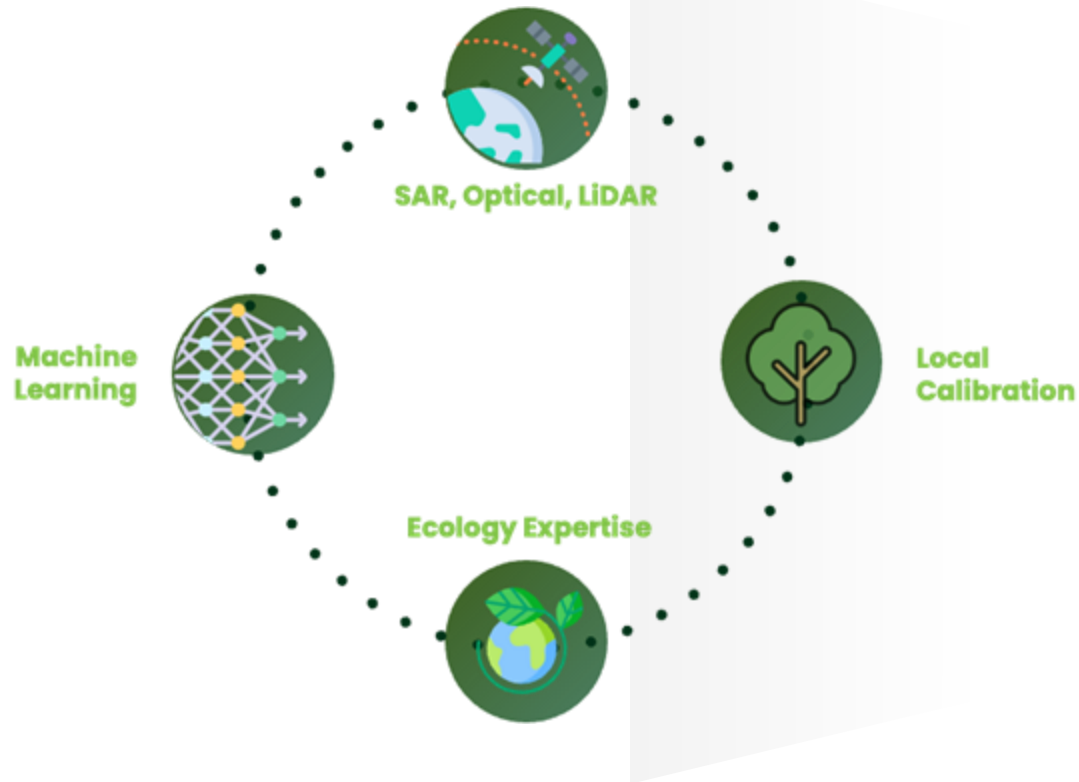
A year of radar satellite data, Brazil



How our process works

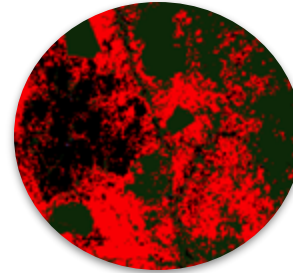


Inputs

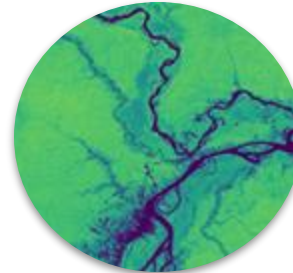


Data

Land Cover



Carbon Stock



Validation

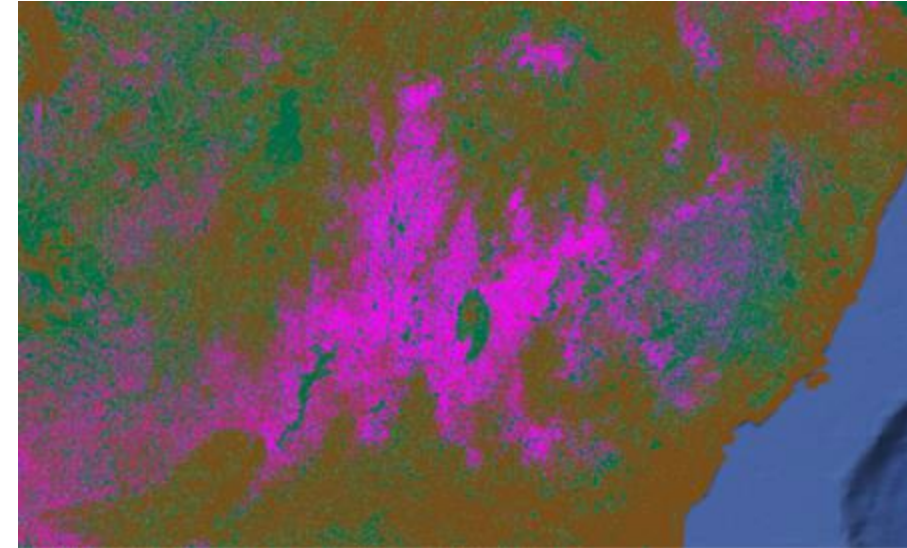
Accuracy
Assessments

Uncertainty
Estimates

Best input data + Class leading technology + Experts (Tech, AI, Ecology) + Tests + Iteration

Brazil Tree Crop Area maps

- non forest
- core forest
- Coffee or Cocoa



Coffee plantation in Brazil – example

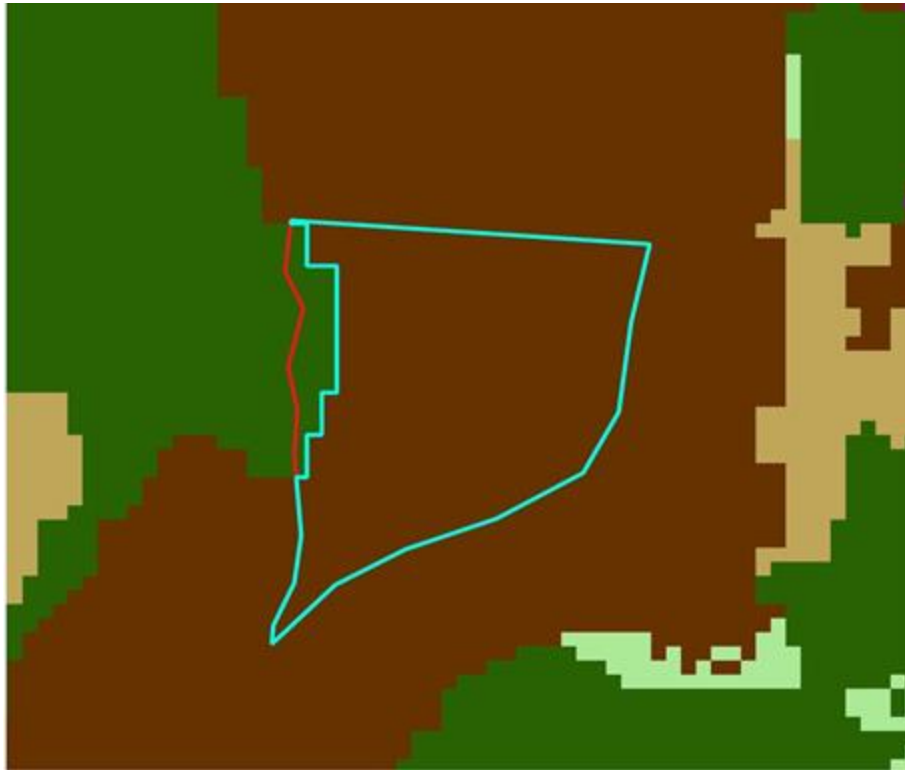


Farm boundary

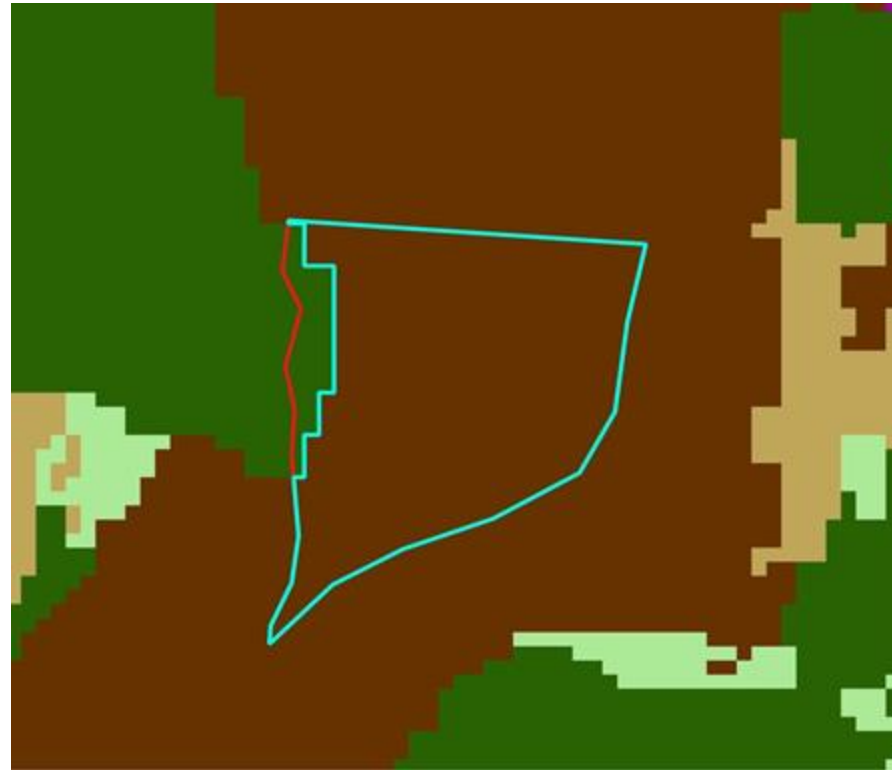


Coffee identified within the farm boundary

Brazil land cover change maps



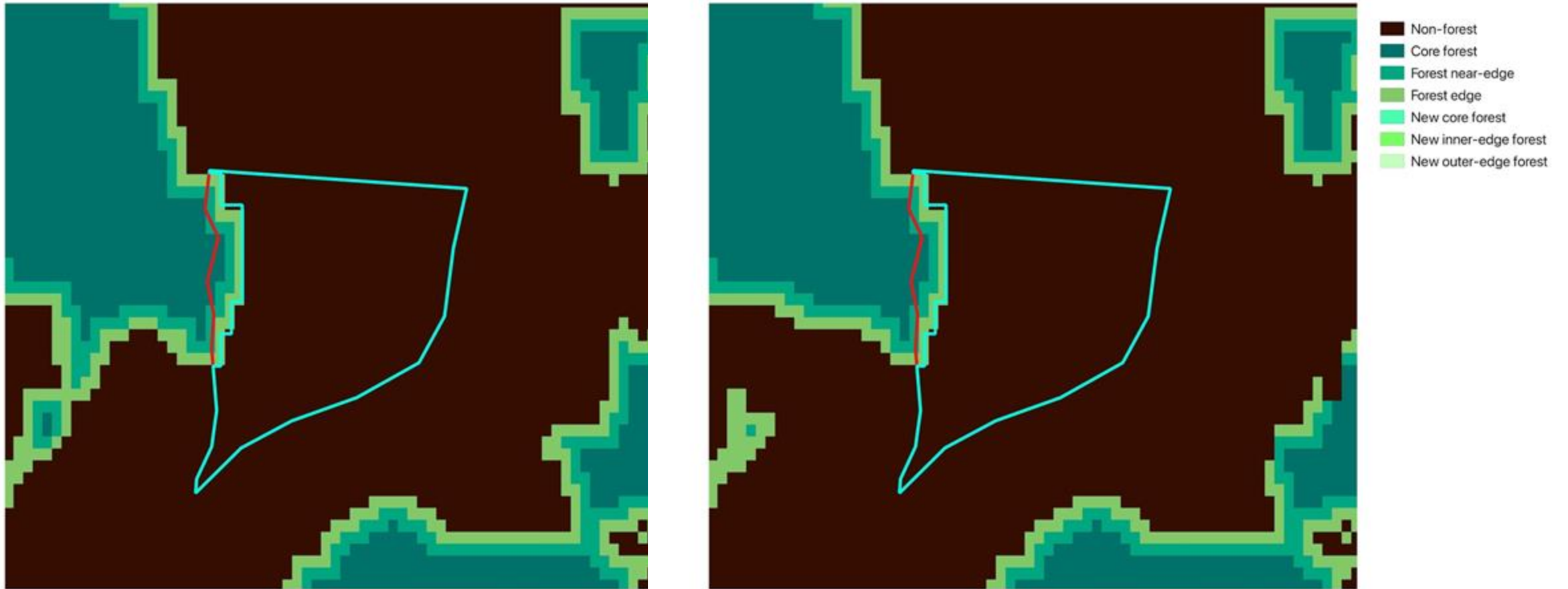
LC map 2020



LC map 2024

- Dense Forest
- Open Forest
- Mangrove Forest
- Flooded Forest
- Plantation Timber
- Coffee Cocoa and other Tree Crops
- Palm and Bananas
- Shrubs
- Grassland and Pasture
- Agriculture
- Bare and Built
- Water

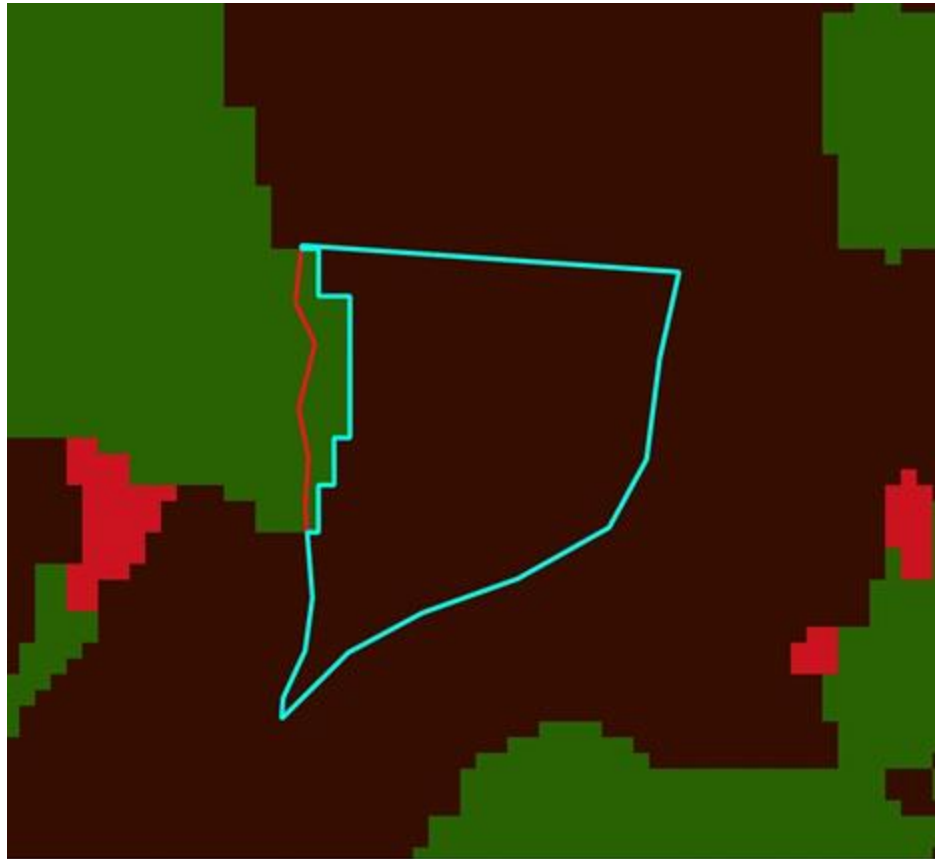
Forest edge maps 2020/2024



Forest/non-forest map 2020

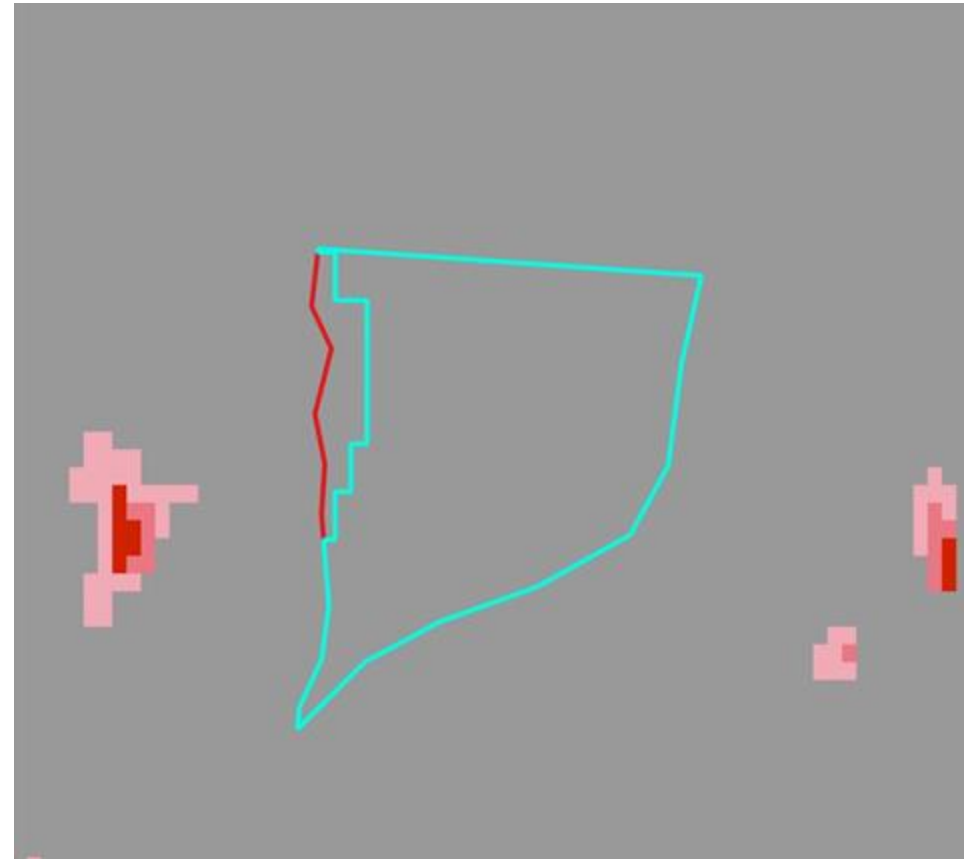
Forest/non-forest map 2024

Mapping deforestation



- Stable forest
- Deforestation
- Afforestation
- Stable non-forest

LC change map 2020-2024



- non-EUDR-deforestation
- Core EUDR Deforestation
- Inner Edge EUDR Deforestation
- Outer Edge EUDR Deforestation

Farm pass/non-pass

MERIDIA

Farm plot data verification



Thomas Vaassen

Co-founder and CEO at Meridia



Meridia is an **AgTech** company specialised in software solutions for field data within complex agri-commodity supply chains

10+ years experience

experience within supply chain data

Verified 3M farm plots

(11M+ Ha uploaded)

100+ employees

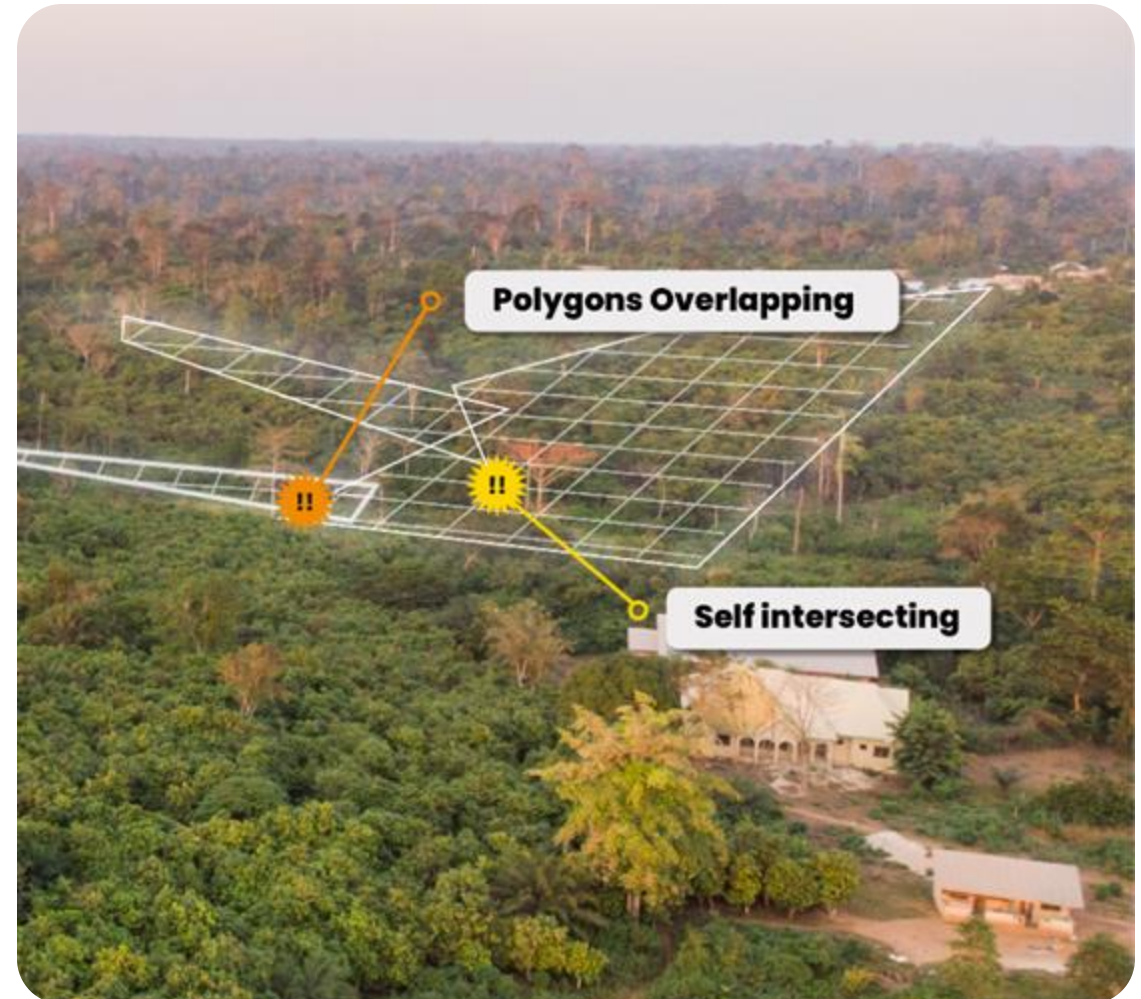
around the world

Trusted by



Field-proven data quality testing

- **30+ data quality tests** focusing on integrity, consistency, and plausibility checks followed by an actionable guide for suppliers.
- **Local ground-truthing and large network of local contacts** to refine methodology, validate assumptions, and access jurisdictional data.



Local-law conformant legality checks

- **Enhanced protected area maps** with exception layers for legal agricultural use, tailored to local land-use permissions and realities.
- **Fewer false positives** allows to focus only on truly high-risk areas, saving time and resources.
- **Appeals and arbitration support** offers guidance and tailored solutions to resolve issues promptly.

Sui River Forest Reserve

Legal framework: Establishment of protected areas in Forest Act (1927). Establishment of Forestry Commission (The 1992 Constitution of Ghana: Chapter 21, Article 269) and right to manage protected areas (Forestry Commission Act, 1999 (Act 571))

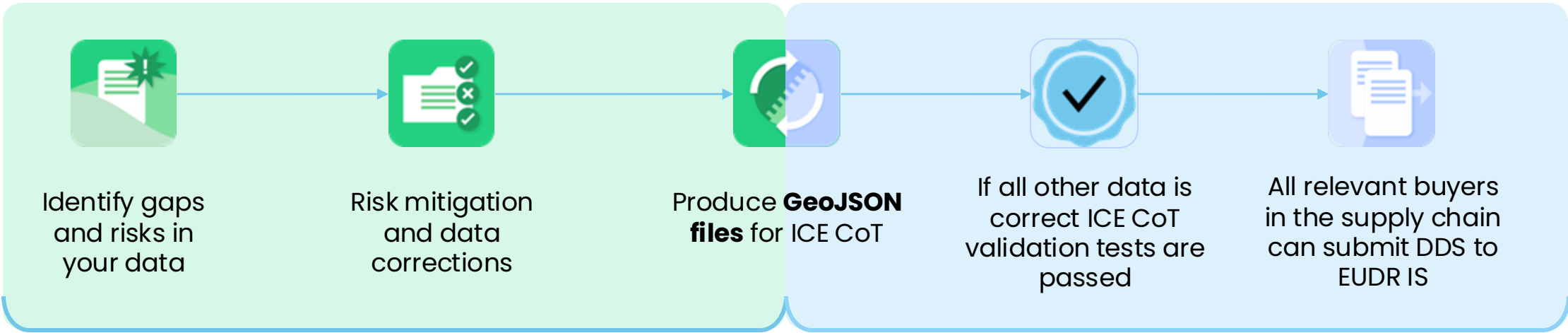
Protected areas exceptions

Meridia field team coordinated with Ghana government agencies to identify and map 3,054 admitted farms (30k Ha.) of land within Ghana forest reserves have farming permissions to grow cocoa, granted by the Forestry Commission. **Low risk rating** for admitted farms.

- ✓ Local legal context
- ✓ Simplified due diligence

Fast, scalable, and audit-ready trading of coffee and cocoa

Meridia Verify helps to save MRV resources on risk mitigation before you submit your data to ICE CoT.



Identifying and mitigating risks in field data



Facilitating trading and the demonstration of regulatory compliance

Upstream

Downstream





Thomas Vaassen

Co-founder and CEO at Meridia



MERIDIA

Thank you!



Lawful production and compliance risk data

Questionnaires and review protocol

Solution structure

Two-stage questionnaire to understand the IMS in place

Questionnaires are standardised: country-specific details are listed in the Lawful Production Annex and Risk Mitigation Annex



Aggregator Systems Questionnaire

- Gathers key information about the IMS and aggregators in the supply chain



Lawful Production and Risk Questionnaire

- Gathers specific information on how the IMS ensures compliance with applicable legislation, and how risks of non-compliance are mitigated



Lawful Production Annex

- List of applicable legislation per country of origin for each EUDR legality topic



Risk Mitigation Annex

- Lists relevant mitigation measures per EUDR legality topic, based on OECD guidelines

- *Affirmative responses required to confirm required supply chain systems and processes in place*
- *Additional information reviewed as required; all information subject to audit*
- *All questionnaires and review processes are transparent and available to ICE CoT users*

Aggregator systems questionnaire

Understanding systems in place for supply chain management

Part 1 IMS and Audit

- Identification of relevant aggregators in each specified country
- Information regarding IMS, audit process and audit history
- Presence of IMS across all specified aggregators
- Information underlying each IMS and the audit process

Part 2 Traceability at the Aggregator

- IMS can track commodities from the farmer into the product parcels supplied by each aggregator, to ensure they are produced on valid farm plots
- IMS collects evidence to demonstrate this, including farmer purchase records
- IMS can identify the quantity of commodity corresponding to each Parcel ID created in ICE CoT at each aggregator

Part 3 EUDR Grievance Mechanisms, Communications and Violations

- EUDR requirements are communicated to supply chain actors, including in contracts
- Grievance mechanisms are in place and information regarding these is provided
- Compliance issues are reported

Key Takeaways

- *Collects key IMS information at aggregator level*
- *Includes third-party and internal audit information*
- *Requires analysis and verification of IMS*
- *Only aggregators identified in completed Aggregator Systems Questionnaires may be associated with a product parcel on ICE CoT*
- *Information is designed to be verifiable by ICE CoT Field and Desk-Based Inspection Programme*

Lawful production and compliance risk questionnaire

Assesses the systems and processes in place with respect to specific origin laws identified for each relevant EUDR topic (land use rights, environmental protection, TPR and FPIC, labour rights and human rights, tax, anti-corruption, trade and customs)

- Requires IMS for all specified aggregators in each country of production
- IMS must collect information to demonstrate compliance with relevant legislation for each legality topic, including as listed in the applicable Lawful Production Annex
- And assess the risk of non-compliance with such legislation
- Proportionate mitigation measures must be in place where a risk of non-compliance is identified, in line with OECD guidance, as listed in the Risk Mitigation Annex
- Systems and evidence of compliance must be available for inspection and verification as requested

Development of the Lawful Production Annex



Lists applicable legislation per country of production for each EUDR legal topic

1

Mapping of applicable laws

- Based on the key EUDR thematic areas
- Standard template generates a list of relevant laws

2

Requirement identification

- Local legal expert review and analysis
- Multiple sources and comparable assessment
- Expert sustainability input to identify applicability to cocoa and coffee production
- Comprehensive database of applicable laws and requirements

3

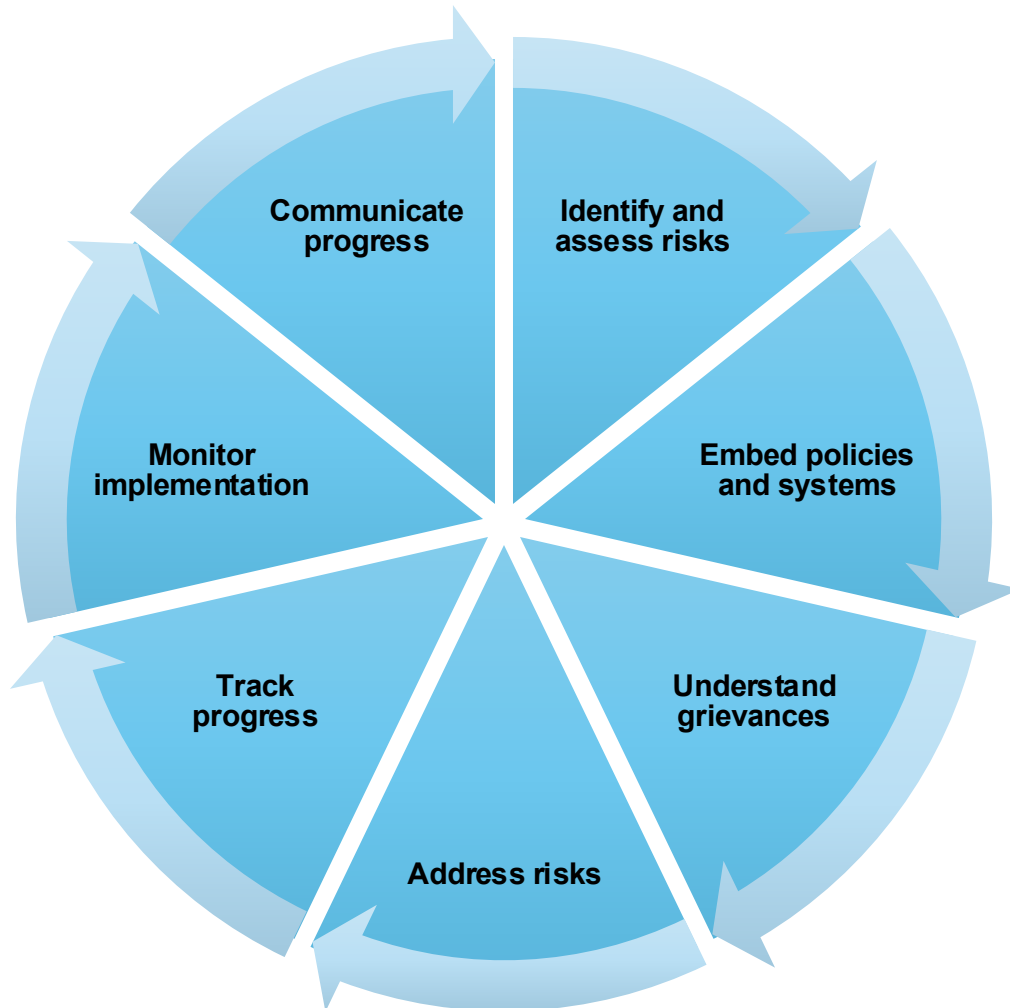
Refinement and annex generation

- Scoping to EUDR parameters and guidance
- Standardised list of laws and requirements for each production country

Development of the Risk Mitigation Annex



Lists relevant mitigation measures per EUDR legal topic



Measures based on OECD guidance and expert sustainability input

Where a risk of non-compliance is identified, mitigation measures must be identified:

- Risk assessment on IMS
- Policy development and implementation
- Grievance mechanisms
- Development of action plans
- Effectiveness tracking of action plans
- Audits or reviews of implementation
- Communicate progress



Physical flow traceability data

Specification and validation
methodology



ICE CoT: Traceability overview

Connecting uploaded and validated farm plots and aggregators to product parcels

Traceability data model



- Simple and effective: Offers a straightforward traceability model that traces back to aggregators and associated farm plots with key data requirements at each supply chain stage
- Industry-informed development: Shaped by feedback from cocoa and coffee operators and traders, as well as NCAs

Validation of traceability data



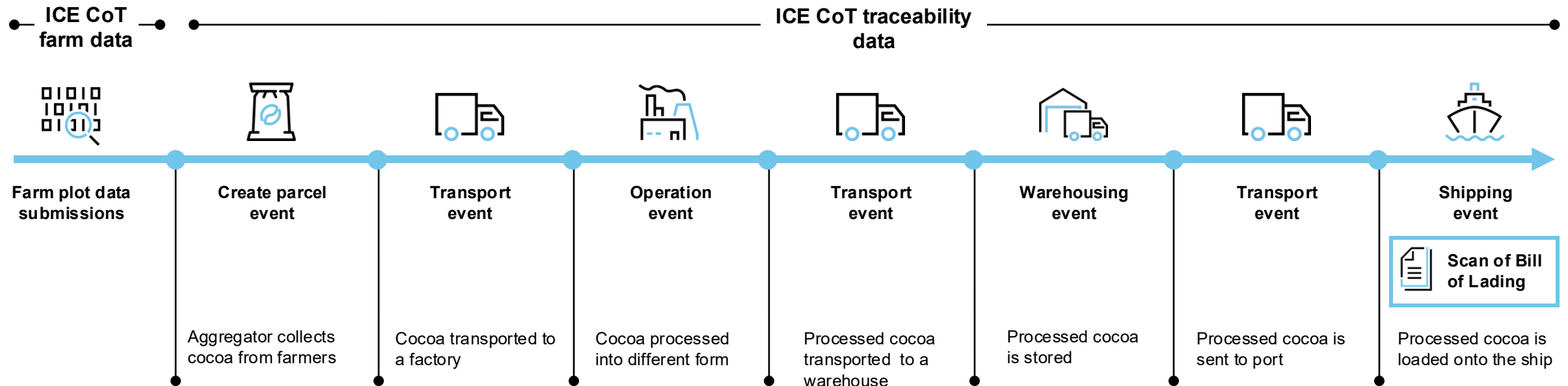
- Reasonability and conformity checks on physical flow data, including transport and processing (e.g. validating expected yields when processing cocoa beans to cocoa liquor).
- Third-party audit programme includes questionnaire information uploaded in respect of identified supply chain control points



Tracking parcels with events

ICE CoT tracks the flow of parcels through the supply chain, using the following event types that represent real world activity:

- **CreateParcel** – sourcing of product from an aggregator is the start of every traceability tree: links the traceability data to farm plots
- **Transport** – movement of product, typically by truck
- **Warehousing** – storage of product at a facility
- **Operation** – action carried out on product at a facility, for example, washing, processing beans into liquor, butter or powder, etc.: also used to specify splitting, merging and ownership changes that occur without any other associated event
- **Shipping** – movement of product associated with a Bill of Lading: ICE CoT requires a scan of the Bill of Lading



Physical flow traceability data inputs



Create Parcel

(sourced from Aggregator)

- Country
- Event ID
- Event Date
- Aggregator ID/List of Farmer IDs
- Aggregator document ID
- Crop year
- Output parcel:
 - Parcel ID
 - Net weight
 - HS code
 - Product type

Initial aggregation point will be subject to questionnaires assessing systems and processes to identify farmers and underlying records



Transport

- Country
- Event ID
- Event Date
- Parcel IDs (input/output)
- Document Reference
- Destination

Operation and warehousing events at facilities, and all transport and shipping events, will be subject to questionnaires assessing systems and processes to ensure product parcel identification, integrity and appropriate segregation

All underlying information and documents must be available for inspection by ICE CoT on request



Operation

- Country
- Event ID
- Event Date
- Facility ID
- Operation type
- Parcel IDs (input/output)
- Net weight (if changed)
- Output HS code (if changed)
- Output product type (if changed)



Warehousing

- Country
- Event ID
- Event Date
- Facility ID
- Parcel IDs (input/output)
- Evidence detail (depending on available underlying document)
- Document Reference



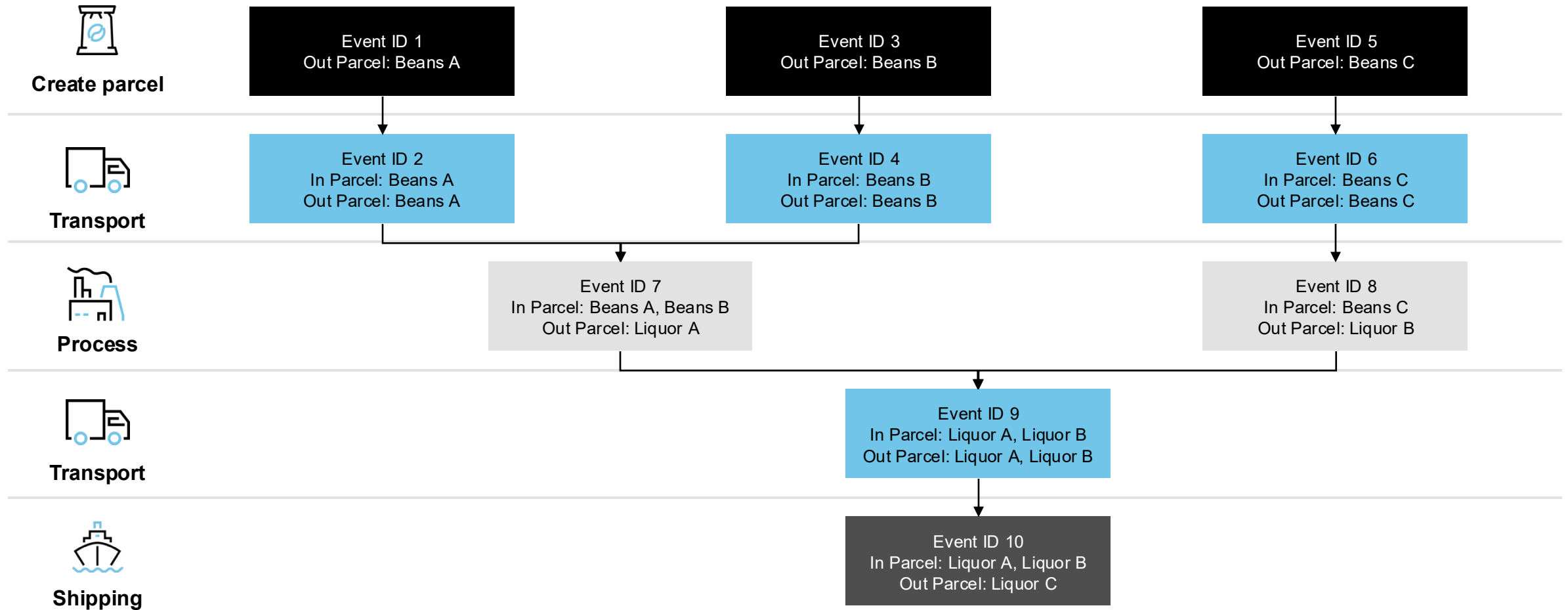
Shipping

- Country
- Event ID
- Event Date
- Parcel IDs (input/output)
- Bill of Lading scan:
 - Document ID
 - Product type
 - Origin port
 - Sender name and address
 - Destination port
 - Receiver name and address
 - Vessel name
 - HS code
 - Gross weight















Scan of Bill of Lading

Traceability tree example

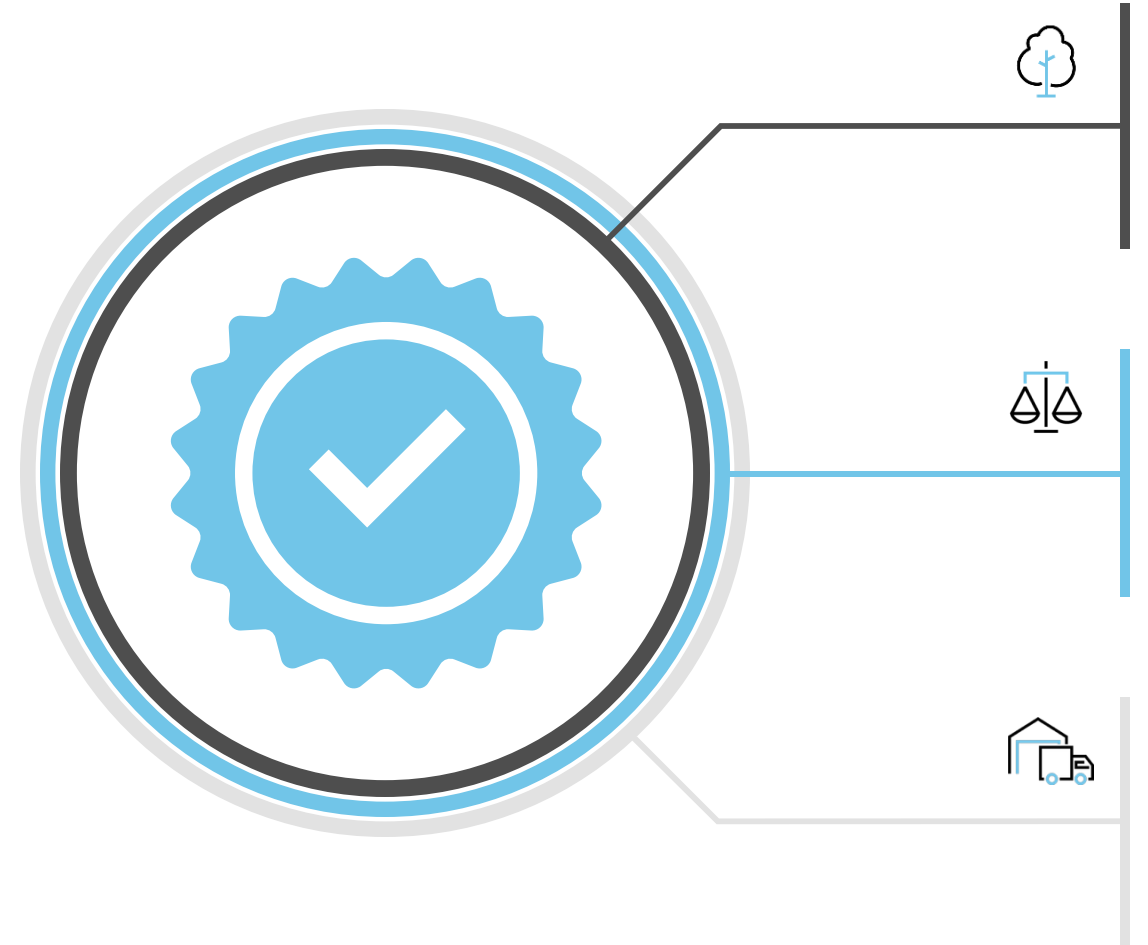


Physical flow traceability data methodology tests

Full Traceability  All parcels submitted to ICE CoT must be fully traced back to a set of farmers and farms Traceability data must show all the countries that product has passed through	Volume Reasonability  The volume of product for a set of farm plots cannot exceed reasonable production level based upon total plot area and country	Country Check  ICE CoT lawful production and risk protocol requirements	Aggregator Check  ICE CoT aggregator and lawful production and risk protocol requirements
Valid Source Farms  All farms referenced in the traceability data have passed all ICE CoT checks (including checks for deforestation and protected areas)	Weight Consistency  The volume of product is consistent as it moves through the supply chain	Farmer to Aggregator  Farm plots must be within a reasonable distance of the aggregator	Bill of Lading  Scan of a Bill of Lading must be provided before a DDS can be generated Data on the scanned B/L is consistent with the traceability data
Processing  ICE CoT validates processing data is reasonable Ratio of input to output weights during processing must be consistent	Event Dates and Sequencing  Event Dates must be consistent and sequenced	Event Types  Consistency rules governing the relationship between input and output parcel data	Parcel ID Uniqueness  Parcel identifiers must be unique

ICE CoT system uses automated tests of submitted traceability data against the methodology, surveillance team assessment, and third-party field-and desk-based inspections

Risk assessment and mitigation



Risk assessment and mitigation



Risk assessment

- Article 9 DDI is collected, analysed, and validated through:
 - Mandatory input data requirements and methodology tests
 - Questionnaire completion and review process
 - confirmation of required systems and evidence
 - identification of compliance risks requiring mitigation
- Dashboard sets out details of risk assessment against Article 10 criteria per production country
 - based on the DDI and relevant secondary source data



Risk mitigation

- Methodologies incorporate and test risk mitigation elements
- Questionnaires require and review information regarding appropriate mitigation measures
- Only parcels with complete and validated DDI will be accepted

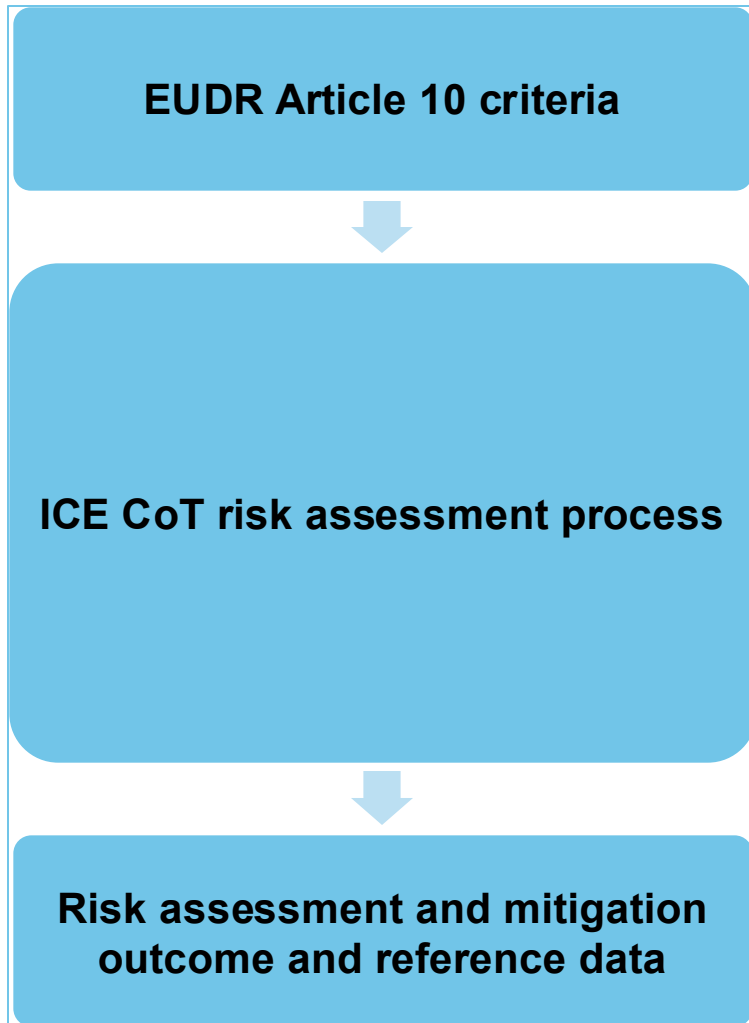


Risk-based inspection programme

- Risk-based inspections of farmers, aggregators, facilities, and parcels across all origin data uploaders and key origins
- Audit underlying evidence and systems to confirm truthfulness, accuracy and completeness

- Embedded risk assessment and mitigation processes, summarized in the dashboard, supports users in demonstrating:
 - DDI is analysed, verified and risk-assessed, including against the Article 10 criteria
 - residual compliance risks have been identified and mitigated
 - documented and reviewed record of decisions
- Third-party inspection programme audits systems and evidence underlying ICE CoT data:
 - based on auditable control points generated by the methodologies and questionnaires
 - supports ICE CoT due diligence framework and demonstrating the data is true, accurate and complete
- ICE CoT can form part of a user's due diligence system and support DDS reporting

Risk assessment dashboard



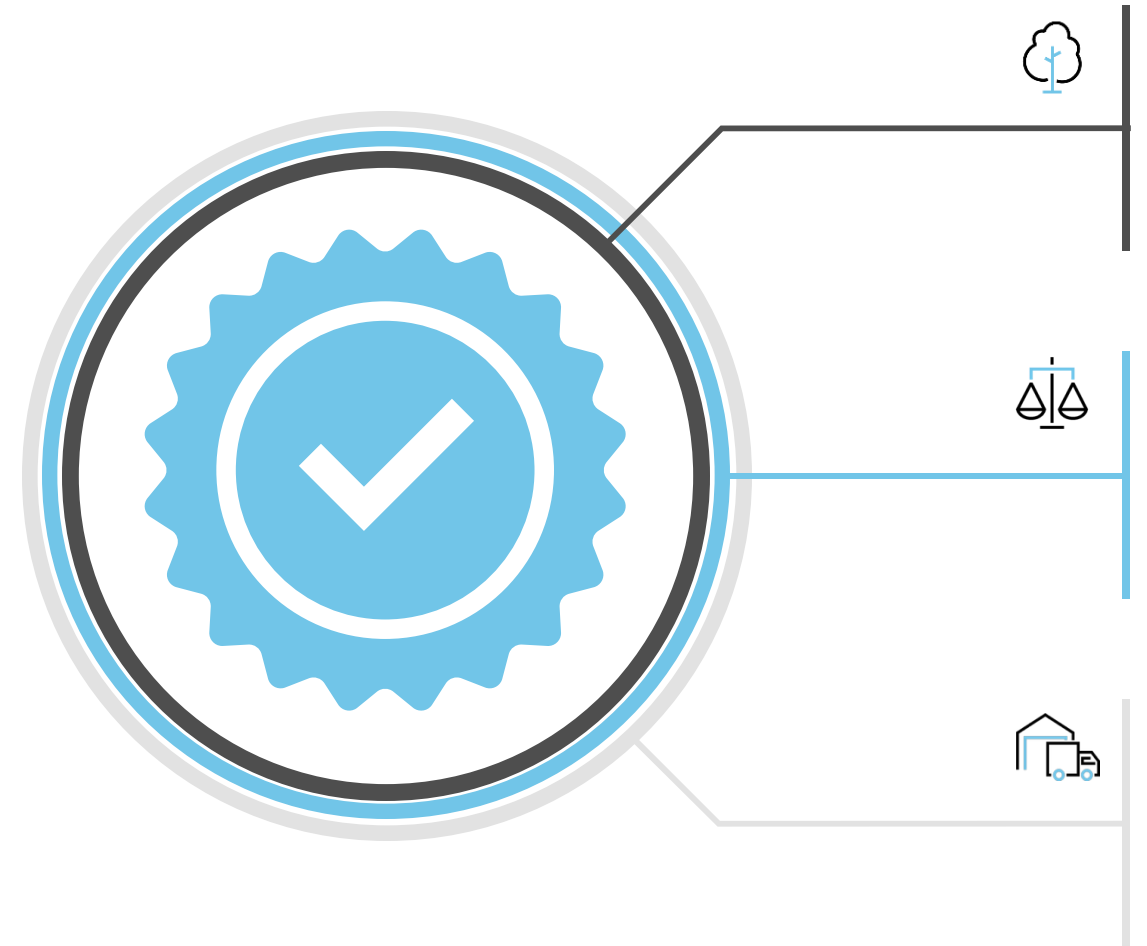
- Sets out how ICE CoT risk assessment process maps onto EUDR Article 10 criteria
- Based on the collected DDI

- One risk assessment dashboard is shown for each production country
- Incorporates relevant reference data (e.g. forest/deforestation statistics, country risk, and sanctions information)
- Built gathering information from trusted sources (e.g. World Bank, Transparency International, UN, among others.)
- Consolidates outcomes of ICE CoT solutions (farm plot, lawful production and compliance risk, and physical flow traceability)

- Supports users in demonstrating due diligence risk assessment and provides a documented and reviewed record of decisions on risk assessment



Acceptance of parcels in ICE CoT: The 'badge'



ICE CoT badge



Identifies a parcel that has all required input data and has passed all ICE CoT validation tests and reviews

The badge can be passed with the product parcel to potential buyers

Underlying data remains associated with the product parcel

1. Farm data



- Mandatory data uploaded and tested against methodology
- Deforestation tests use Space Intelligence maps
- Protected areas, data integrity and plausibility
- Farm plots become eligible for reference in a product parcel



2. Lawful production and risk data



- All lawful production and compliance risk information provided through completion of questionnaires and reviewed
- Aggregators and related supply chains for each production origin become eligible for reference in a product parcel



3. Traceability data



- Mandatory data for a product parcel uploaded and tested against methodology
- Complete traceability tree
- Tests for data consistency and plausibility
- Control point information collected through completion of questionnaires and reviewed
- Parcel must reference eligible plots, aggregators, facilities and transport
- Eligible parcel may be registered and transferred



4. Information and badge



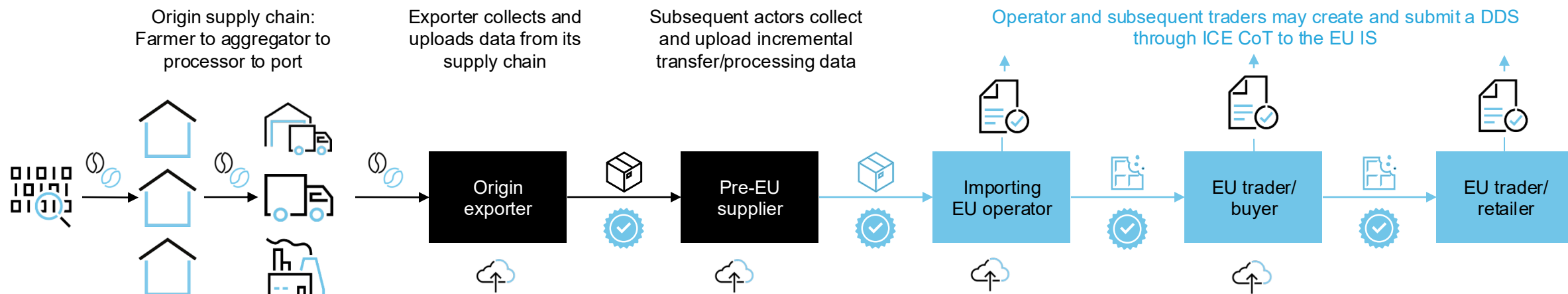
- Badges may be transferred from a seller to a buyer to show compliance with ICE CoT requirements
- All underlying data remains with parcel, which may be supplemented and shared as necessary along the supply chain
- EU importers/operators have all necessary inputs to create and submit a DDS
- Supports downstream operators/traders in ascertaining due diligence and issuing further DDS
- ICE CoT retains records to handle enquiries and information requests



ICE CoT enables frictionless selling and buying of 'badged' product

Supply chain actors outside EU – not directly subject to EUDR

Supply chain actors in EU – subject to EUDR



Initial data uploader provides:

- Farm plot (geolocation) and traceability data, which is tested against methodologies developed with Meridia, Space Intelligence maps and protected areas layers
- Lawful production, risk mitigation and traceability questionnaire responses and data, which are reviewed

Subsequent data uploaders provide:

- Incremental traceability and processing data, which is tested



If all data is provided and all validation tests are passed:

- Parcel is created.
- Data stays with parcel.
- 'Badge' of validated status may be shared with potential buyer.

ICE CoT



All buyers in the supply chain have access to the public data specification and methodologies and confirmation that the products have passed ICE CoT's validation tests, designed to support operators and traders with their EUDR compliance obligations

ICE CoT control framework



Data specifications and methodologies, membership

- Robust internal specifications, methodologies and technology to collect and test information uploaded to ICE CoT
- Membership criteria and onboarding process for data uploaders

Robust data collection and testing system



Audit and inspection programme

- Risk-based methodology for expert third-party desk and field-based audits
- Independent inspections of systems and evidence related to parcels, aggregators and farmers, and facilities

Confidence in the platform and the data



Governance and oversight

- Advisory and Oversight Committee comprised of key stakeholders
- Governance framework based on regulated functions including independent board, record keeping, conflicts management, operational risk management, internal audit

Trusted governance framework



Stakeholder engagement

- Regular NCA meetings
- Liaison with key stakeholders and associations
- Industry outreach and presentations
- Trials and pilot testing

Industry and regulatory alignment



Grievance, challenges surveillance

- Compliance-risk grievance mechanism
- Process to challenge outcomes
- Complaints policy
- Surveillance on data and use behaviour

Integrity and fairness



Assurance mechanism

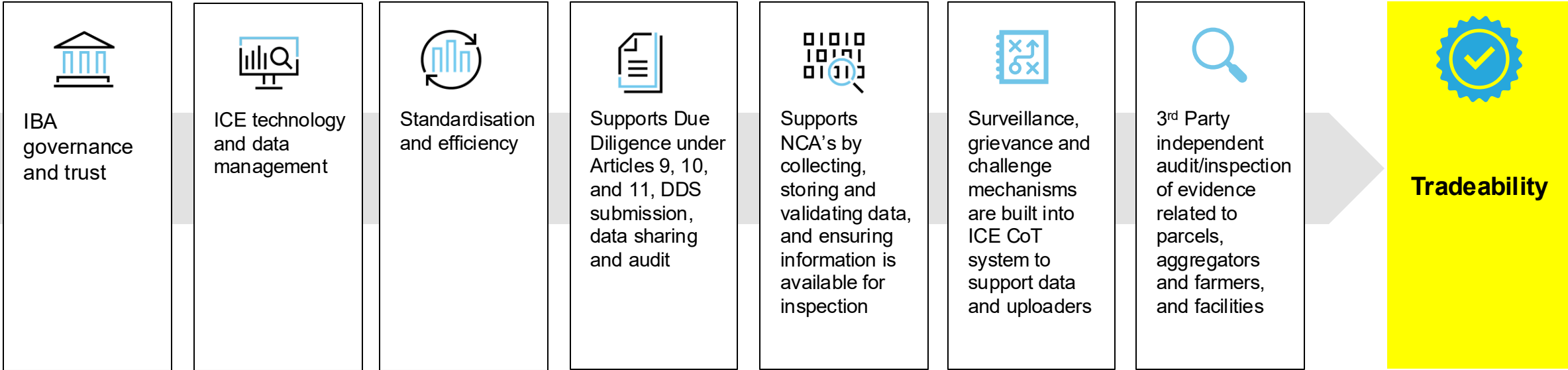
- Independent third-party to provide assurance audit of the ICE CoT platform, its systems and methodologies
- Publication of assurance report covering key control points

Third-party assurance of the platform

ICE CoT value proposition

The ICE CoT platform is designed to maintain access to the EU market

ICE CoT advantages

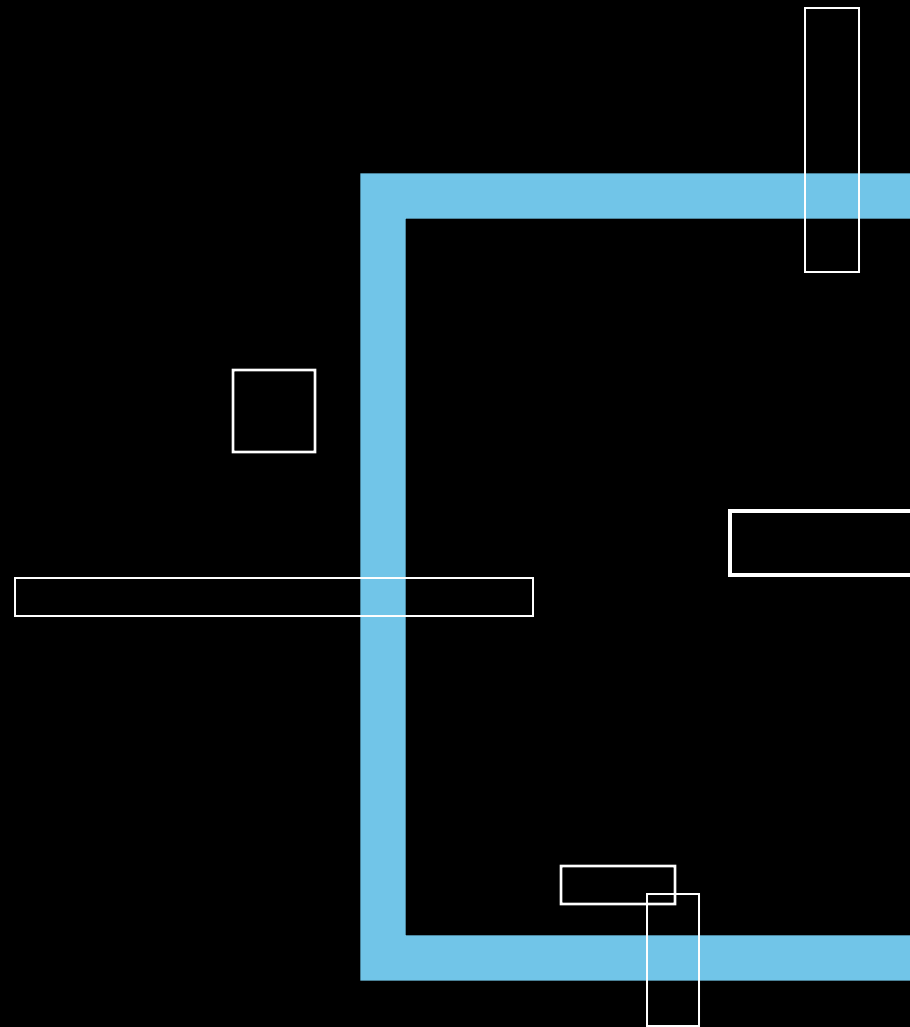


Visit our public methodology on the ICE CoT website



Scan here to learn more

Questions?



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