



ALIGNMENT OF CAMEROON WITH THE EUDR :
**TOWARDS INCLUSIVE COMPLIANCE
OR THE SILENT EXCLUSION
OF SMALL-SCALE COCOA PRODUCERS ?**



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Acronyms & abbreviations

AI	Artificial Intelligence
CIG (GIC)	Common Initiative Group
EFI	Institut Européen de la Forêt
EU	European Union
EUDR	European Union Deforestation Regulation
FAO	Food and Agriculture Organization of the United Nations
FMA (UFA)	Forest Management Unit
FODECC	Cocoa and Coffee Development Fund
GAP	Good Agricultural Practices ()
GIZ	German Technical Cooperation
ICCC	Interprofessional Cocoa and Coffee Council
MINADER	Ministry of Agriculture and Rural Development
MINEPAT	Ministry of the Economy, Planning and Regional Development
MINFOF	Ministry of Forests and Wildlife
NEPAC	Network for the Promotion of Agroecology in Cameroon
NGO	Non-Governmental Organisation
ONCC	National Cocoa and Coffee Board
PAD CACAO	Cocoa Development Support Programme
PPRA (ARMP)	Public Procurement Regulatory Agency
PSE	Payments for Ecosystem Services
SND 30	National Development Strategy 2020–2030
TFRD	Tropical Forest and Rural Development
WWF	World Wide Fund for Nature

ABSTRACT

The cocoa sector occupies a strategic position in Cameroon's economy, given its major contribution to export revenues and the livelihoods of small producers. The adoption of Regulation (EU) 2023/1115, known as the RDUE, now imposes strict requirements on traceability, legality and zero deforestation requirements on exporting countries for access to the European market. In this context, Cameroon has launched several institutional and technical initiatives in order to anticipate the alignment of its cocoa sector with the new rules.

This briefing note analyses Cameroon's actual level of alignment with the EUDR from the perspective of small cocoa producers. It is based on a qualitative approach combining documentary analysis, multi-stakeholder consultations and interviews with experts from civil society, academia and producer organisations.

The study shows that, despite significant progress such as the introduction of geolocation tools, the development of a due diligence manual and the establishment of a coordination framework around the CICC, major limitations remain.

In terms of traceability, existing systems are still fragmented and only partially centralised, with difficulties in fully identifying producers and giving them access to their own data. With regard to the zero-deforestation criterion, the ecological characteristics of

Cameroon's cocoa-growing areas – marked by complex dynamics between forests, agroforests and fallows make it difficult to demonstrate compliance. This requirement sometimes conflicts with national strategies to increase production, placing small producers in particular at risk of exclusion.

As far as legality is concerned, the complexity of the national legal framework, the coexistence of customary law and statutory law, and widespread land and social informality all limit the capacity of small producers to provide the required evidence, even though they are not directly responsible for carrying out due diligence.

Ultimately, Cameroon has embarked on an important process towards EUDR compliance, but the effective level of preparedness of small producers remains uneven and partial. Without stronger support, governance and inclusion mechanisms, vulnerable actors' risk being excluded from European supply chains.

The postponement of the regulation's entry into application therefore represents a strategic opportunity to consolidate existing arrangements and to ensure a gradual, fair and inclusive transition for the cocoa sector.



INTRODUCTION

The cocoa sector occupies a strategic place in Cameroon's economy, given its significant contribution to the main macroeconomic aggregates. In 2024, it generated almost 1,000 billion CFA francs in export earnings¹. This structuring role justifies particular attention, especially in view of the growing challenges the sector faces on international markets, notably in terms of sustainability (zero deforestation, producer income and child labour).

It is in this context that Regulation (EU) 2023/1115, adopted on 31 May 2023, was introduced, concerning the placing on the market of the European Union (EU) and the export from the EU of certain commodities and derived products associated with deforestation and forest degradation, commonly referred to as the European Union Deforestation Regulation (EUDR). The regulation mainly covers seven commodities, including cocoa and coffee. Initially scheduled for 31 December 2025, the entry into application of the EUDR has been postponed to 30 December 2026, with an additional grace period for micro and small enterprises until 30 June 2027². This phasing-in is intended to ensure a gradual transition and to allow the strengthening of the IT systems used by operators, traders and their representatives to submit electronic due diligence statements.

In 2025, Cameroon stated that it was ready to implement the EUDR with regard to cocoa, in light of a number of steps already taken. Nonetheless, despite this progress, major concerns remain as to the actual level of national preparedness and the ability of stakeholders to meet the three core EUDR requirements, namely traceability, legality and zero deforestation as of 31 December 2020.

Although public and private initiatives do exist, there are still significant questions

over the effective inclusion of frontline actors in the value chain, in particular small producers and local communities, in the transition towards "zero-deforestation", legal and traceable supply chains. This is all the more crucial as the divergences between perceptions, farming practices and legal and policy frameworks appear to be one of the major challenges for EUDR implementation at smallholder level.

This note therefore seeks to analyse Cameroon's degree of alignment with the EUDR from the viewpoint of small cocoa producers, by assessing their capacity to meet the requirements on traceability, legality and zero deforestation. It highlights potential risks of exclusion while also identifying opportunities for more inclusive and equitable compliance.

The methodology applied is based on a qualitative and participatory approach combining legal and documentary analysis, multi-stakeholder consultations and interviews with 15 experts from civil society, the academic sector and producer organisations. This approach enabled data triangulation drawing on feedback from field experience.

The three sections of this note examine the readiness of small Cameroonian producers in light of the EUDR's main requirements, namely traceability (A), zero deforestation (B) and legality (C), focusing on the current situation, the challenges and the implications of each of these criteria.

¹Guide to due diligence on the legality of cocoa under the EU-Cameroon Economic Partnership Agreement, July 2025.

²<https://www.europarl.europa.eu/news/fr/press-room/2025/1/20IPR31498/deforestation-le-parlement-soutient-les-mesures-de-simplification>



TRACEABILITY WITHOUT CONTROL :
**WHEN EUDR COMPLIANCE
UNDERMINES SMALL HOLDER
PRODUCERS**

In terms of traceability, Regulation (EU) 2023/1115 sets out specific requirements. It makes the geolocation of production plots mandatory (Articles 9(1)(d) and 2(28)). For plots larger than 4 hectares, polygon data with precise GPS coordinates must be provided (Article 2(28)). The regulation also requires the collection, documentation, verification and storage of data, which must be verifiable and retained. In this respect, information relating to GPS coordinates, the date of production and the last supplier must be collected (Articles 9(1)(e) and 9(1)(d)). These provisions aim to guarantee full traceability of products and to strengthen transparency within the supply chain.

1- OVERVIEW OF COCOA TRACEABILITY IN CAMEROON

In Cameroon, as regards the traceability criterion, several initiatives are currently under way to geolocate plots of land, driven by various public and private actors involved in the process. According to the Interprofessional Cocoa and Coffee Council (CICC), around 90% of cocoa plots had already been geolocated by June 2025.

At the Forum on Cameroon's preparedness for EUDR compliance, held in Yaoundé on 15 July 2025, the CICC reported that institutions other than exporters had already geolocated around 550,000 plots, including 400,000 plots by FODECC, 24,500 plots by GIZ and 14,500 plots by the CICC. Some NGOs, such as WWF, Rainforest Alliance and TFRD, are also carrying out geolocation initiatives as part of their projects, but their data are not made public.

According to the information shared at the forum, in July 2025, 79% of exported cocoa was certified and therefore geolocated, representing 147,476 tonnes out of 187,575 tonnes, based on the 2025 season balance sheet. In the same period, in 2025, almost 35,000 additional plots were geolocated by exporters, representing

around 21,000 tonnes of cocoa.

To date, however, it remains difficult to determine the exact percentage of plots that have actually been geolocated. Field observations reveal a significant duplication of data: some producers are identified and geolocated by several different actors, while others say they have never undergone any geolocation operation at all. This situation raises serious questions about the reliability, consistency and transparency of the data produced.

"We have never been geolocated. It's the people in the cooperatives who have had their fields registered. We haven't yet"

Farmer, Ekombité village, March 2025

Beyond the lack of comprehensive coverage, some producers also question the quality of the geolocation work carried out in the field, particularly with regard to the accuracy of plot boundaries.

The private sector, at the initiative of the CICC, has embarked on a process of pooling geolocation data through the GEOSHARE platform. However, this platform is not a data-centralisation tool as such, but rather a data-sharing gateway between exporters. It therefore remains limited, as it does not make it possible to know precisely the total number of producers actually geolocated at national level. In addition, data pooling remains complex, since each actor uses its own data collection methodology, leading not only to duplicated information but also to difficulties in storing, managing and harmonising the data, and thereby raising questions about their coherence.

"Discreetly, when they geolocate, they don't take the exact boundary of the field. They even add a bit, where we could extend."

Farmer, Ekombité village, March 2025

Following the conclusions of the CocoaTalk, the Interprofessional Cocoa and Coffee Council (CICC) was mandated to ensure the geolocation of plots throughout the national territory, due to the robustness of its methodology. According to the CICC, Cameroon has around 300,000 cocoa producers. In April 2025, 150,000 plots belonging to 100,000 producers had already been geolocated, with a target of reaching 185,000 plots corresponding to 125,000

producers by the end of 2025. On this basis, around 175,000 producers would still need to be geolocated out of an estimated total of 300,000 potential producers. As a result, geolocation of plots and identification of producers remain largely incomplete, with more than 50% of producers still not identified. This percentage could be even higher if we take into account the rush to create new cocoa plots that have not yet been geolocated, prompted by the high cocoa prices observed in 2024 and 2025.

In the cocoa sector, on the private sector side, each exporter geolocates the fields of the producers, cooperative members or other actors in its own supply chain, in order to operate its own traceability and geolocation system and to retain control over the data generated. The main difficulty with this practice is that producers are neither the owners nor the managers of their own data and have no control over them, as the data are managed exclusively by the operators who collect them, which raises major governance, transparency and equity issues.

In fact, the transposition of some of the data did not match the actual location of the fields but instead pointed to other areas. With support from GIZ, CICC plans to make the necessary corrections to these geolocation data during the year 2026.

As regards the traceability of cocoa beans, the public sector is currently working on the development of a national strategic approach to traceability. On the private sector side, each exporter has its own traceability system enabling it to track and export its cocoa. Nevertheless, some exporters still do not have their own traceability system and, in 2025, around 15% of cocoa was exported by such operators.

2- IMPLICATIONS OF TRACEABILITY FOR SMALL-SCALE PRODUCERS

Traceability has a number of implications for smallholder producers :

For geolocated producers :

Access to data: although the producer is in principle the primary owner of the geolocation data, once these are collected by the various actors, they no longer have access to them. They therefore do not control their management or their security, since these data are administered exclusively by the operators who collect them. Limited freedom to choose geolocation operators: producers often have limited access to the geolocation operators of their choice, which can lead to increased control over production by specific actors in the value chain. This situation may encourage price manipulation, market concentration and a loss of control over marketing by producers and their cooperatives. As a result, producers become increasingly dependent on particular buyers or exporters, thereby reinforcing situations akin to a monopoly through the ownership and control of geolocation data. This dynamic is all the more problematic given that the cocoa marketing system in Cameroon is officially based on a principle of market liberalisation. This constraint is clearly illustrated by testimonies collected in the field.

“The company that geolocated our fields is the only one to which we can sell our cocoa, and to no one else. We already know who we will sell our cooperative’s cocoa to.”

“The company that geolocated our fields is the only one to which we can sell our cocoa, and to no one else. We already know who we will sell our cooperative’s cocoa to.”

Farmer, Ngoro, March 2025. Risk of commercial use of data: there is a real risk that producers’ data will be sold or used commercially without their knowledge.

Farmer, Ngoro, March 2025.

Risk of exclusion: some cocoa producers’ risk being excluded from supply chains to the European Union market, particularly because their plots have not been identified or geolocated.

Weakening of producer organisations: these dynamics contribute to weakening cooperatives and collective structures that represent producers.

3- POSSIBLE PATHWAYS TO COMPLY WITH THE TRACEABILITY REQUIREMENT

In light of these implications, several solutions can be considered:

- It is important to equip cooperatives with the

necessary resources to enable them to better manage traceability and the data relating to their members.

- For producers who have already been geolocated, the collected data must be made available to them and a system for automatic information sharing should be established from the data collection stage onwards.
- Speed up the process of identification and geolocation entrusted to CICC, in a participatory and inclusive manner, in order to facilitate the exhaustive identification of all cocoa smallholder producers in Cameroon.
- CICC should produce and distribute cards for producers who have already been geolocated. These cards should contain all relevant information on the producer (name, polygon, location) encoded in a functional QR code.
- Establish a mechanism for the automatic production and distribution of producer cards that are fully functional and contain all the necessary information about the producer and their cocoa plots, in order to resolve the problem of access to information.
- To strengthen transparency, it is necessary to create a framework for the regular dissemination of data relating to the geolocation of plots.



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THE CAMEROONIAN
SMALL-SCALE PRODUCERS **AND**
THE EUDR ZERO-DEFORESTATION
REQUIREMENT

1- CONTEXT OF ZERO DEFORESTATION AND FALLOW LAND UNDER THE EUDR

Article 2, paragraph 13, point (a) of the Regulation defines as “deforestation-free” those relevant products that contain, have been fed with or have been made using relevant commodities, provided that they come from land that has not been subject to deforestation after 31 December 2020. In accordance with Article 2, paragraph 3, “deforestation” is understood as the conversion of forest to agricultural use, whether human-induced or not.

In practice, identifying land that was originally forest land is a major challenge. Recognising forests within the meaning of the definition set out in the Regulation requires particular attention. At this stage, satellite and aerial images do not allow clear distinctions to be drawn between areas under cocoa cultivation and those that are not. Consequently, the expansion of existing cocoa orchards or the establishment of new plantations after 31 December 2020 cannot be objectively assessed on the basis of remote-sensing data alone, without drawing on information collected directly on the ground.

The issue of fallow land adds to this complexity. The Regulation does not explicitly define either “fallow agricultural land” or the precise time limits of what constitutes agricultural use. According to Article 2, paragraph 5, an area is considered to be “for agricultural use” where the objective of the land use is agriculture. Agricultural land therefore covers, in particular, temporary crops, i.e., land used for crops whose growth cycle is generally less than one year, including temporary multi-annual crops, as well as land that has been left fallow.

Fallow land, or temporary fallow, refers to agricultural land left to rest before being brought back into cultivation, used for grazing or assigned to other agricultural

activities. It may form part of a crop-rotation system or result from legitimate constraints or exceptional circumstances, such as flooding, water shortages, lack of inputs, or economic and social reasons (illness, inheritance disputes) or legal reasons (land tenure conflicts) (EFI, March 2024).

It should be stressed that, under the Regulation, land that has been put into or remains in fallow is generally considered to remain “for agricultural use” for a period of up to ten years. Beyond this period, a plot may nevertheless continue to be recognised as agricultural land if it can be shown that the resumption of agricultural activities has been prevented for one of the aforementioned reasons. This provision is already empirically reflected in some local farming practices, as illustrated by field observations.

The implications for Cameroon are significant. As an exporting country to the European Union and directly concerned by the implementation of the Regulation on deforestation-free products, Cameroon faces particular difficulties in distinguishing between old fallows (over ten years) and regenerated forests.

This distinction requires robust evidence, such as records of land use, geolocated data or information from field surveys. The clearing of recent fallows (less than ten years) may be considered where it is justified on socio-economic grounds, but remains subject to enhanced

“We no longer clear forest for fields, because we know we can use fallow land.”

*Woman farmer,
Mintom, March 2025*

³ www.fibois-aura.org/wp-content/uploads/2024/10/20240926_Presentation_RDUE_FI-BOIS_AURA-2.pdf

2- CURRENT SITUATION AND CHALLENGES OF ZERO DEFORESTATION EFFORTS IN CAMEROON

The project “Mapping cocoa orchards in Cameroon and assessing their impact on forests” is being implemented by FAO. Its aim is to map the main cocoa-producing areas in Cameroon while assessing the impact of this crop on forest ecosystems. This mapping exercise, supported by satellite data and robust methodological analyses using artificial intelligence (AI), will provide an overview of the interactions between cocoa production and deforestation. However, the finalisation and publication of the tree cover / non-tree cover maps, land-use maps and cocoa probability maps currently being developed will not make it possible to identify land that was already intended for agricultural use as at 31 December 2020.

The policy for the development of the cocoa sector set out in the National Development Strategy 2020-2030 (SND 30) presents the revival of this sector as a driver of rural growth and aims to increase national production to 640,000 tonnes by 2030, compared with around 300,000 tonnes at present.

To achieve this objective, the PAD-Cacao project provides for the rehabilitation of 41,250 hectares of orchards, the creation of 33,000 hectares of new plantations and the regeneration of 100,000 hectares of old orchards in the main production basins of the Centre, South, East, Littoral and South-West regions. The implementation of this policy can already be seen on the ground through the establishment of numerous new plantations in the agro-ecological zones of the country that are suitable for cocoa cultivation.

However, this growth trajectory, based on spatial expansion, runs counter to the principle of “zero deforestation” required by the EUDR, which prohibits the establishment of cocoa plantations on land deforested after 31 December 2020. The challenge for Cameroon will therefore be to reconcile the 640,000-tonne target for 2030 with deforestation-free sustainable growth, which is an essential condition for maintaining access for Cameroonian cocoa to the European

market.

Cocoa production basins are mainly located in agro-ecological zones with bimodal rainfall (Centre, South and East) and monomodal rainfall (Littoral and South-West). In these agro-ecological zones, the natural vegetation is forest. When agricultural land is abandoned, it often undergoes rapid vegetative recolonisation, favoured by the humid climate and high rainfall (1,500 to 3,500 mm per year) and constant humidity, which promote the spontaneous germination of seeds and the natural regeneration of forest species, enabling fallow land abandoned for 5 to 10 years to develop a dense tree cover. In addition, Cameroonian forest soils contain a rich seed bank of pioneer species such as *Musanga*, *picnanthus*, *Macaranga*, *Albizia*, *Ficus*, etc. Those species, quickly colonise former agricultural plots, creating young secondary forest from the second year of fallowing.

⁴ The Cocoa Development Support Project (PAD-CACAO) is an initiative of Cameroon's Ministry of Agriculture and Rural Development (MINADER), financed by FODECC for the 2022–2026 period. It aims to restructure and modernise the cocoa sector by increasing production (with a target of 640,000 tonnes by 2030) through the regeneration of plantations, the provision of high-performance planting material (seed) and irrigation systems, while at the same time promoting sustainable agroforestry. https://armp.cm/details?type_publication=AO&id_publication=50804

3- ANALYSIS OF THE IMPLICATIONS OF THE ZERO-DEFORESTATION REQUIREMENT FOR SMALL-SCALE PRODUCERS

The analysis of the implications of the zero-deforestation requirement for smallholder producers can be conducted at several levels.

a- *Limits to the expansion of cocoa farms*

To understand the implications of the EUDR “zero-deforestation” requirement for cocoa small-scale farmers, it must be examined in the light of practices within small-scale communities. Smallholder producers are characterised by low levels of technical equipment and financial resources, which explains their tendency to bring ever larger areas under cultivation in order to increase production and thereby improve their living conditions.

Small-scale farmers mainly carry out their

agricultural activities on customary land, which is neither registered nor, consequently, included in the cadastre. The EUDR requirement to exclude forest land from cocoa cultivation implies that small-scale farmers may only farm land that is considered non-forest after December 2020. This constraint is likely to trigger a rush for land deemed “EUDR-compliant”. In this context, demand for such land could increase sharply, resulting in heightened marginalisation of smallholder producers, who are often less competitive in gaining access to and acquiring land.

Lacking land titles for the most part, small-scale farmers have historically resorted to extensive agriculture, sometimes to materialize the occupation of space. However, the EUDR now prohibits this practice, which severely limits their ability to increase cultivated areas and, consequently, their production.

Moreover, demonstrating that the areas farmed are “not deforested after 2020” requires considerable efforts in terms of generating and validating field data. This requirement is intended, in particular, to correct classification errors that may arise, on the one hand, from satellite-based observation methods and, on the other, from the specific features of agroforestry systems, which are widespread and sometimes difficult to distinguish from natural forests, especially in the cocoa sector.

Ultimately, this dimension highlights a significant reduction in the room for manoeuvre available to smallholder producers to expand their plantations. Any increase in production must henceforth come either from land that was already non-forest before 2020 or from the intensification of existing production systems, which implies additional investment that is often beyond the reach of the smallest producers.

b- Inability to sell products on the European Union market

Exported cocoa to the European Union will have to be accompanied by evidence that its production has not caused deforestation. Smallholder producers, who are often weakly organised and lack adequate access to digital traceability tools, risk seeing their products excluded from formal supply chains. Failure to comply with EUDR requirements could thus lead to a fall in volumes sold, lower prices at local level and increased dependence on less demanding – but also less remunerative – markets.

“Some agents from certain subsidiaries, even those working in the field, are faustins. I know them: they buy cocoa at lower prices and their bosses are sometimes not informed. The price the company tells us is not the price at which they actually buy. They act as faustins behind the scenes; they do not buy at the official price.”

This situation would place smallholder producers in a particularly vulnerable position, as they would become increasingly dependent on untracked collection networks or the informal market, commonly known as “coxeurs”. As several testimonies collected in the field indicate, this growing dependence would further expose producers to the practices of so-called “faustins”.

*Farmer, Ekombité village,
March 2025*

Furthermore, although the price per kilogram of cocoa fell progressively at the end of 2025 and the beginning of 2026, to around 1,500 CFA francs at local level and 2,500 CFA francs in Douala, the 2024–2025 period was marked by particularly attractive prices, averaging around 5,500 CFA francs per kilogram. This surge in prices attracted substantial investment into cocoa cultivation.

“I sold my cocoa for over 40 million last year. I sent the children to school and bought 50 hectares of forest in Yoko to expand, because here the cocoa plantation is already exhausted and old; we will need new plantations.”

*Woman farmer, Biakoa,
April 2025*

In this context, economic elites and actors with sufficient financial resources, often promoters of large plantations, are more likely to comply with EUDR standards, while smallholder producers risk being excluded from formal value chains, thereby exacerbating existing economic and social inequalities.

In this regard, several actions appear necessary, in particular advocacy for appropriate support mechanisms, including funding for participatory mapping, capacity-building for producers, improved access to traceability tools and the

promotion of good agricultural practices (GAP). In addition, the structuring and strengthening of cooperatives are key levers for pooling efforts to comply with the EUDR and enabling more balanced collective bargaining with buyers.

⁵A term used to call the barely identifiable middle-men (coxeurs) who buy cocoa at rock-bottom (very low or ridiculous) prices.

4- POSSIBLE WAYS TO STRENGTHEN THE PREPAREDNESS OF CAMEROON'S COCOA SECTOR AHEAD OF THE EUDR'S ENTRY INTO APPLICATION

To prevent this requirement from exacerbating inequalities and undermining smallholder producers' livelihoods, several solutions need to be implemented in the short and medium term.

Exploring the possibility of recognising agroforests as not constituting deforestation

First and foremost, it is necessary to clarify and adapt a national definition of deforestation so that it is fully aligned with the local agricultural context. Cameroon must clearly distinguish between natural forests, agroforests, degraded forests and old fallows. This distinction would help ensure that bringing already degraded agricultural land or long-term fallow back into production is not automatically treated as "deforestation".

It would also be important to support Cameroon's advocacy on agroforests, in order to have their ecological specificity and their contribution to maintaining tree cover in cocoa landscapes duly recognised. To this end, a joint order issued by the Ministry of Forests and the Ministry of Agriculture and Rural Development could specify that converting fallow land or an agroforest with a certain level of tree cover does not constitute an infringement within the meaning of the EUDR. Such a measure would provide legal certainty for smallholder producers and reduce the risk

of unjustified exclusion from the European market.

Participatory mapping of cocoa plots

It is then essential to establish a participatory mapping exercise for cocoa plots. This approach would make it possible, with the support of local communities and cooperatives, to document the location and age of plantations. Data collected – such as GPS coordinates, satellite images and attestations from traditional authorities or cooperatives – would serve as evidence that the majority of plantations were established before the cut-off date of 31 December 2020.

Such mapping, validated by municipalities and deconcentrated State services, would strengthen traceability while preventing farmers from being penalised simply because they lack land titles or cadastral documents.

Rehabilitation and sustainable intensification of existing plantations

In addition, it is advisable to promote the rehabilitation and sustainable intensification of existing plantations rather than their expansion. Public authorities and technical partners should support the renovation of old cocoa farms through the provision of planting material, the promotion of grafting and the dissemination of agroforestry practices. This orientation helps to stabilise production without encouraging the conversion of new land, thereby meeting the "zero expansion" requirement while maintaining farm profitability.

Regularisation and remediation of plots established after 2020

Furthermore, it is crucial to set up a mechanism for the regularisation and remediation of plots established after 2020 and cultivated by smallholder producers. Rather than definitively excluding these producers from the European market, it

would be fairer to offer them a pathway towards compliance. Such a scheme could, for example, include commitments to restore degraded areas, replant shade trees or participate in community reforestation programmes. In return, they would receive technical support and gradual access to certified markets. Funding for this mechanism could come from a National Green Transition Fund for Cocoa, financed jointly by the State, exporters and development partners.

Monitoring land-use change and mapping current land use

Likewise, effective implementation of the EUDR requires a shift from mapping administrative land-use categories to mapping actual land use. Cameroon should promote a national system to monitor land-use change, based on remote sensing, field surveys and community validation, in order to clearly distinguish forest, agricultural and agroforestry areas. Unlike land-cover maps, which indicate administrative status (forest management units, reserves, mining areas), land-use mapping makes it possible to identify what people are actually doing on the ground and to demonstrate that certain agricultural areas have not caused post-2020 deforestation. Coordinated between MINFOF, MINADER, MINEPAT and local authorities, such a system would be an essential tool for verifying the compliance of cocoa, supporting territorial planning and enhancing supply-chain transparency.

Economic incentives and sustainable alternatives

Finally, these measures should be accompanied by appropriate economic incentives. Producers who meet the “zero-deforestation” requirement should benefit from sustainability premiums or preferential access to green finance. Payment for environmental services (PES) schemes could reward those who maintain

tree cover or restore riparian zones.

At the same time, training on sustainable economic alternatives – such as local cocoa processing, beekeeping or the production of non-timber forest products – would help diversify income sources and reduce pressure on land.



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**THE LEGALITY REQUIREMENT :
A STACK OF OBLIGATIONS
THAT IS BARELY SUSTAINABLE
FOR SMALL-SCALE PRODUCERS**

Article 3 of the EUDR requires operators placing cocoa or cocoa-derived products on the EU market to ensure that these have been produced in accordance with the relevant legislation of the country of production.

To support key stakeholders in applying the legality criterion in Cameroon, a Due Diligence Manual has been developed and endorsed by the Cameroonian State. This Manual comprises two modules: the first sets out the legal requirements considered relevant, based on a nationally agreed and participatory vision; the second proposes a due diligence approach made up of a wide range of possible actions and takes into account the existence of relevant certification systems.

More than thirty legal requirements that cocoa – produced mainly by smallholder producers – must meet in order to be placed on European Union markets have thus been identified and classified according to the legal categories defined by the EUDR. Given the complexity of these requirements and the technical, financial and material resources needed to comply with them, questions arise as to the extent to which local realities are taken into account and, above all, as to producers' actual capacity to fulfil all the conditions required to be compliant.

However, the Cameroonian context calls for particular attention to be paid to how the identified legal requirements play out for smallholder producers in certain domains. With regard to land-use rights, for example, it should be noted, on the one hand, that customary law and statutory law coexist.

Although the latter asserts its authority, more widespread and predominant customary practices do not always make it possible to determine clearly who owns a given production area. In addition, various types of arrangements exist between rural workers and smallholder producers, and between customary landholders and cocoa farmers.

This does not always make it easy to link the cocoa destined for the market with a holder of land-use rights. On the other hand, there is no clear physical delimitation between different land allocations and types of use,

particularly as regards the national permanent forest estate. As a result, many family farms are located in permanent forests, without necessarily being taken into account in current forest management plans.

In terms of labour law, the cocoa sector in Cameroon displays two main features: first, employment relationships are highly informal and dominated by task-based workers; secondly, the sector relies largely on family labour, which is crucial for smallholder producers who lack the means to hire qualified, paid workers. These two characteristics significantly reduce smallholder producers' ability to comply with the relevant legal requirements.

Lastly, with regard to environmental protection, the size of plantations (on average 4 hectares for the vast majority) is not conducive to meeting requirements relating to prior environmental impact assessments. In addition, the predominance of family labour – generally unfamiliar with the detailed environmental protection requirements – means that the scope for fully optimal implementation of legal provisions must be assessed with a degree of pragmatism.

1- IMPLICATIONS OF APPLYING THE LEGALITY CRITERION FOR SMALL-SCALE PRODUCERS

Although smallholder producers are not themselves responsible for carrying out due diligence, they play a central role in the implementation of the legality criterion. In accordance with the EUDR, they contribute to collecting the information, data and documents needed to conduct due diligence.

In essence, applying the legality criterion requires smallholder producers to put in place systems for collecting, managing and providing data and information, which are not always suited to their current ways of operating. Under national law, agricultural activities are prohibited in the permanent forest estate.

Nevertheless, some producers have established plantations in this zone over a number of years, sometimes out of ignorance or a lack of knowledge of the exact boundaries of these

prohibited areas. Field observations show that cocoa farmers whose plots are located in the permanent domain are already starting to be removed from the lists of certain operators.

Measures therefore need to be adopted, such as raising producer awareness; producing and disseminating land-use maps; updating and disseminating management plans for forests in the permanent domain; and popularising the applicable legal texts, in order to prevent producers from continuing to create or expand plantations in these prohibited zones.

2- KEY ISSUES RAISED BY THE LEGALITY CRITERION FOR SMALL-SCALE PRODUCERS

Access to market

Compliance with legality requirements will provide permanent access to the EU market. This certainty that their products can be sold will improve smallholder producers' incomes and living conditions.

Conversely, if substantial efforts are not made in relation to legality, producers risk growing cocoa that cannot be sold to the EU. This will inevitably affect the incomes of smallholder producers, their families and all the peripheral actors who depend on cocoa production, with adverse repercussions for social stability.

Organisation of producers around federating entities

Legality also acts as a catalyst for cooperative work among smallholder producers. The legality requirements linked to the EUDR mean that smallholder producers must organise themselves into groups (cooperatives, Common Initiative Groups, etc.) so that they can share the financial burden and resource needs associated with producing legal cocoa that can secure a strong position on the European market.

Recognition of the efforts of producers already organised in cooperatives

The application of the legality criterion is an opportunity to recognise and enhance the efforts already made by certain producers to organise themselves collectively.

3- CHALLENGES POSED BY THE LEGALITY CRITERION FOR SMALL-SCALE PRODUCERS

Knowledge and command of the legislative and regulatory framework (the challenge of complexity)

The seven areas of relevant legislation referred to in the EUDR correspond to a plethora of texts, which themselves may be subject to reform. As a result, mastering or fully appropriating all the resulting requirements can prove extremely difficult for smallholder producers.

Qualitative and quantitative insufficiency of financial, human and material resources

The various legal and regulatory requirements to be met in order to comply with the EUDR call for substantial human and financial resources that smallholder producers do not necessarily possess. In terms of human resources, familiarity with authorised inputs and pesticides, and the need to resort to professional applicators, are particularly illustrative in this regard. Furthermore, all these measures require financial resources that are not always accessible to smallholder producers. This lack of resources has, moreover, contributed to the expansion of "coxeurs" in the cocoa supply chain. The fact that alignment with the EUDR may require additional financial means could therefore exacerbate a phenomenon that is already widely decried.

The challenge of equity

The EUDR is inequitable in so far as it subjects cocoa to the same regime as commodities such as palm oil, soya and timber. Yet most of these commodities are primarily produced by large agro-industrial companies, whereas around 80% of cocoa production is in the hands of smallholder producers. The disparity in the resources that these two categories of actors are able to mobilise translates into a greater capacity for agro-industries than for smallholder producers to comply with the EUDR. This is all the more evident given that support for smallholder producers, in terms of risk-mitigation under the EUDR, remains only a possibility, not a firm commitment.

Increased vulnerability of smallholder producers due to the absence of the required documents

The fact that the due diligence procedure is the responsibility of the operator may place smallholder producers in a vulnerable position vis-à-vis those operators. Operators may, for example, overstate the strictness of EUDR requirements towards smallholder producers or intensify price speculation for cocoa supplied by producers who do not comply with certain provisions of the Regulation.

The limited understanding and ownership of the Regulation, which is clearly observable in the field, may also considerably increase the hold of “coxeurs” over smallholder producers, fuelled in particular by the threat that their products could be excluded from the EU market.

Destruction of plots encroaching on permanent forests

Access to agricultural land is particularly challenging for some communities, such as indigenous peoples, who are often expelled from their ancestral lands to make way for, among other things, protected areas. In this context, a number of plantations located within protected areas have been extended over time. These encroached areas are not always included in the enclaves provided for in the management plans for these protected areas. There is therefore a considerable risk that such farms will be excluded from the market, with serious consequences for the survival of smallholder producers in this situation.

Misuse of collected data (with potential impacts on prices and the tax burden)

The due diligence procedure requires the collection and transmission of detailed data on plots and their users. However, the lack of effective control over these data by smallholder producers can place them in a position of dependence on the operators who fund and organise the data-collection process. This informational asymmetry may influence cocoa price negotiations between the parties and, more broadly, reinforce the entrenched position of “coxeurs” in the supply chain.

In addition, the misuse or unilateral capture of these data may also have undesirable effects at institutional level. The State could, for example, use them to broaden its tax base, by levying property tax on cultivated plots or agricultural taxes on smallholder cocoa producers.

In this context, it would be relevant to explore ways of regulating the “data market”, in order to define clear rules on the ownership, access, sharing and valorisation of the information collected. Such reflection would help protect producers against abuses, while paving the way for fair and transparent mechanisms of data governance and agricultural data valorisation.



4- POSSIBLE PATHWAYS TO COMPLY WITH THE LEGALITY CRITERION

Provide training and information on the identified legal requirements and on the tools available to achieve compliance, and share good practices in a spirit of cooperation.

Offer technical and financial support to Cameroonian smallholder producers so that they can comply with the legal framework; Article 11 of the Regulation mentions the possibility (though not the obligation) of providing support, including financial support.

Strengthen certification systems, so as to make compliance easier and to recognise the voluntary commitments already made by certain producers.

Support internal management systems that are fully owned and controlled by cooperatives. The ability of cooperatives to manage compliance autonomously enables them to use information on all aspects of compliance in a strategic way and to strengthen the professionalisation of their organisations as part of a broader risk mitigation strategy.

Establish information management and traceability systems capable of providing reliable and robust information to a wide range of buyers.

Update management plans for permanent forests so as to include the enclaves of cocoa orchards that are currently located within them.

Some operators have begun offering training to producers and other actors in their supply chains. These training activities aim to harmonise their understanding of the overall legal framework in force in Cameroon, in order to minimise the risk that cocoa placed on the market is illegal. Such initiatives should be diversified and multiplied, whether by private companies, public authorities, public or private producer-support bodies, or producer organisations themselves.





CONCLUSION

In Cameroon, since 2023, the cocoa sectors have implemented tailored measures to ensure their compliance with the EUDR ahead of its entry into force. Following various preparatory stages – including the Cocoa Talks, the geolocation of plots, the drafting of the Due Diligence Manual and the development of traceability applications the country asserts that it is ready for the implementation of the EUDR. To fully benefit from the new postponement of its entry into application, Cameroon adopted, on 18 December 2025, a resolution aimed at using this additional time to complete and refine the alignment of national operators, with priority given to accelerating the actions already under way (CICC, 2026).

In this context, and with a view to strengthening the impact of these actions on smallholder producers, this note has reviewed the initiatives undertaken and proposed possible solutions to ensure their inclusive compliance with the EUDR.

This note pursued two main objectives: first, to assess the real level of preparedness and alignment of Cameroon with the EUDR from the standpoint of smallholder cocoa and coffee producers, by analysing their capacity to meet the requirements of traceability, legality and zero deforestation, in light with field practices and existing mechanisms; and second, to identify the potential risks of excluding smallholder producers and local communities from supply chains, while highlighting the levers and opportunities for a progressive, inclusive and equitable alignment of the cocoa–coffee sector.

The analysis shows that, in terms of traceability, the EUDR imposes strict monitoring based on precise geolocation of plots and the management of verifiable data. In Cameroon, despite numerous initiatives and high reported rates, traceability remains partial, marked by data duplication, a lack of centralisation and incomplete identification of smallholder producers. The latter have limited access to their own data and are heavily dependent on certain operators, which in turn weakens cooperatives.

Strengthening the role of CICC and producer organisations, accelerating geolocation and ensuring transparency in data-sharing

emerge as key levers for achieving inclusive, EUDR-compliant traceability.

The zero-deforestation criterion presents major challenges in Cameroon, where cocoa-growing areas are naturally forested and characterised by complex fallow dynamics. Current mapping and remote-sensing tools do not always allow clear distinctions between forests, agroforests and old fallows, which complicates the demonstration of compliance. This requirement is in tension with the national strategy to increase cocoa production, which still relies heavily on expanding cultivated areas.

For smallholder producers, who are often without land titles and dependent on extensive practices, it severely limits the scope for expansion and increases the risk of exclusion from the European market. Clarifying the national definition of deforestation, undertaking participatory mapping and promoting the sustainable intensification of existing plantations are essential levers for an equitable implementation of the EUDR.

With regard to the legality criterion, it requires that cocoa destined for the European market be produced in accordance with Cameroonian law, as set out in a national Due Diligence Manual listing more than thirty legal requirements. However, the coexistence of customary and statutory law, the absence of land titles, the informality of labour relations and the small size of farms all limit smallholder producers' capacity to contribute to demonstrating compliance. Although they are not responsible for conducting due diligence, they must provide data and documents, which exposes them to the risk of exclusion, particularly where their plots are located in the permanent forest estate.

At the same time, meeting this criterion constitutes a lever for securing long-term access to the European market and for fostering producer organisation in cooperatives. The main challenges remain the complexity of the legal framework, the shortage of financial and human resources, the risk of inequity vis-à-vis agro-industries and the potential misuse of the data collected. To ensure fair compliance, key actions include training and supporting producers, strengthening cooperatives and

certification systems, and updating forest management plans to incorporate existing agricultural enclaves.

Thus, despite the authorities' enthusiasm and their assertion that Cameroon is ready for the implementation of the EUDR, many issues remain to be resolved. It is essential to address the challenges associated with each of the criteria before effective enforcement, a task that falls primarily to public authorities and sector-management bodies (ONCC, CICC).

They must also encourage technical and financial partners to support actions aimed at preventing smallholder producers from becoming the main losers in the implementation of the EUDR. The postponement of the entry into force show the EU acknowledges the remaining preparatory work to be completed. This additional time must be used to secure the inclusion of smallholder producers, who are already vulnerable to international price volatility, so that they do not also suffer from the restrictive effects of the EUDR.



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CSOs Members of the NEPAC

ACDIC	Association Citoyenne de Défense des Intérêts Collectifs
ADD	Alternatives Durables pour le Développement
AJESH	Ajemalebu Self Help
APIFED	Appui à l'Auto Promotion et Insertion des Femmes et des Jeunes Désœuvrés
ASD	Action for Sustainable Development
CAEP	Centre for AgroEcology Promotion
CERAD	Centre de Recherche et d'Action pour le Développement Durable en Afrique Central
CIPCRE	Cercle International pour la Promotion de la Création
CNCD	Centre for Nature Conservation and Development
CODED	Communauté et Développement Durable
CPF Mbouo	Centre Polyvalent de Formation de Mbouo
DYPADEL	Dynamique Participative pour le Développement Local
ECODEV	Ecosystèmes et Développement
ERUDEF	Environment and Rural Development Foundation
FLAG	Field Legality Advisory Group
FODER	Forêt et Développement Rural
GADD	Groupement d'Appui pour le Développement Durable
GDA	Green Development Advocates
GVC	Global Village Cameroon
INADES-Formation Cameroun	Institut Africain pour le Développement Économique et Social - Formation Cameroun
RADD	Réseau des Acteurs du Développement Durable
REFELEF	Réseau des Femmes Leaders dans l'Environnement et les Forêts
RELUFA	Réseau de Lutte contre la Faim
SAILD	Service d'Appui aux Initiatives Locales de Développement
SYNAPARCAM	Synergie Nationale des Paysans et Riverains du Cameroun
UNAPROCAM	Union Nationale des Sociétés Coopératives avec Conseil d'Administration des Producteurs de Cacao du Cameroun

The Network for the Promotion of Agroecology in Cameroon (NEPAC) was created in 2023, with a mandate to promote and support the development of agroecology in Cameroon through collaboration, advocacy, research, awareness-raising, sharing experiences, education and support to areas in transition. Its main strategic priorities include: structuring and developing the network's performance, building the capacity of network members, and influencing public policy and stakeholders in favour of agroecology.

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