

# EUDR Compliance Assessment Report

Deforestation Check and Risk Assessment Results

Case Name: DAABON  
Company: Gremca (Daabon)  
User: Grupo Daabon

Report for the automated risk assessment



A GRAS RISK ASSESSMENT  
REGULATION ON DEFORESTATION-FREE PRODUCTS  
REPORT

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# 1 General Information

This report provides the results and documentation of the risk assessment which is required under Article 10 of the EUDR. The regulation requires operators to carry out this risk assessment on the information collected in accordance with Article 9. Operators shall not place the relevant products on the market or export them, except where the risk assessment reveals no or only a negligible risk that the relevant products are non-compliant <sup>1</sup>.

The methodological approaches of GRAS are non-exclusive and non-binding. GRAS takes no responsibility regarding the documents and information contributed by the user. The final conclusion of the risk assessment and mitigation measure to result in no or negligible risk has been taken by the user.

## General Case Details and Supplier Information

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Case-ID	4ef389cc-3293-49b5-b539-1ecf12eab8c9
Case Name	DAABON
User Name	Grupo Daabon
Company Name	Gremca (Daabon)
Batch Description	PALM OIL AND ITS FRACTIONS
Contract Number	000000
Number of uploaded coordinates	0
Number of uploaded polygons	1227

---

## Product Information

The following table contains the product specific information.

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Product 1	
Product Type	Oil Palm
HS Code	1511
Production Period	09-2023 until 09-2024
DDS (previous)	-
Country(s)	Colombia

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<sup>1</sup>Halleux, Vivienne. 2022. "Towards Deforestation-Free Commodities and Products in the EU." Technical report, EPRS: European Parliamentary Research Service.

## 2 Article 9: Information requirements

Operators shall collect information, documents and data which demonstrate that the relevant products comply with Article 3.

### 2.1 Result of Plausibility Check

All uploaded locations (point and/or polygons) were checked for validity and plausibility. The results of this check are summarized as follows:

<hr/>	
Number of uploaded point coordinates	
<hr/>	
Number of uploaded and valid coordinates:	0
Number of uploaded and valid polygons:	1227
<hr/>	

### 2.2 Documentation of Deforestation-free Products

All uploaded locations (points and/or polygons) were checked for overlap with the GRAS forest-reference map of 2020. An overlap indicates a risk for deforestation of the location. It is recommended to complement the information by providing additional analysis and documentation, e.g. additional detailed analysis reporting based on high resolution imagery and time series analysis or on-site visits.

The results of this check are summarized as follows:

	Number of locations
<hr/>	
<b>POINT</b>	
<b>Number of valid point coordinates:</b>	<b>0</b>
Number of deforestation-free coordinates:	0
Number of coordinates overlapping with the deforestation layer (critical case):	0
<b>POLYGON</b>	
<b>Number of valid polygons:</b>	<b>1227</b>
Number of deforestation-free polygons:	1227
Number of polygons overlapping with the deforestation layer (critical case):	0
<hr/>	

The information above is based on the GRAS Risk Assessment.

### 3 Article 10: Risk assessment

Companies need to feed the information gathered under the scope of Article 9 into the risk assessment pillar of their Due Diligence Systems to verify and evaluate the risk of non-compliant products entering the supply chain, taking into account the criteria described in Article 10. Under the scope of Article 11, they need to take adequate and proportionate mitigation measures in case they find more than a negligible risk of non-compliance in order to make sure that the risk becomes negligible. The following sections provide the documentation given by the user to assess and document risks and mitigation measures according to the criteria described in Article 10 and 11.

#### 3.1 EU Benchmarking Results

Operators sourcing from standard and high risk countries or parts of countries are subject to the same standard due diligence obligations, including the collection of information, risk assessment and documentation of risk mitigation measure, as outlined in Article 8 of the EUDR. Operators sourcing commodities entirely from areas classified as low risk will be subject to simplified due diligence obligations. According to Article 13, they will need to collect information in line with Article 9, but they will not be required to assess and mitigate risks (Articles 10 and 11) unless the operator obtains or is made aware of any relevant information, including substantiated concerns submitted under Article 31, that would point to a risk that the relevant products do not comply with this Regulation (Article 13 2).

The results of the EU Benchmarking:

Country	EU Country Benchmark
Colombia	standard

## 3.2 Presence of Forests and Prevalence of Deforestation

In addition to the analysis of provided geolocations against the forest reference map (see Section 2.2), GRAS provides an assessment of the presence of forest and prevalence of deforestation in close distance to the geo-locations to indicate an additional risk factor of the general situation of the region. A risk indication does not contradict the verified deforestation-free status of the location itself. It rather provides an additional factor to consider in the general risk assessment and mitigation procedures. For example, it can help to monitor the quality of the geo-location themselves or collecting polygons in addition to point coordinates in areas with higher presence of forest and prevalence of deforestation.

### 3.2.1 Risk Assessment on Presence of Forests

Art. 10 2. (b) the **presence of forests** in the country of production or parts thereof;

Number of locations	Distance to Forest
POLYGON	
4	>0 - 250 m
9	>250 - 500 m
20	>500 m - 750 m
1194	>750 m

The information above is based on the GRAS Risk Assessment.

### 3.2.2 Risk Assessment on Spread of Deforestation in immediate environment

Art. 10 2. (f) **prevalence of deforestation** or forest degradation in the country of production or parts thereof;

Number of locations	Distance to Deforestation
POLYGON	
1	>0 - 200 m
4	>200 m - 400 m
4	>400 m - 600 m
6	>600 m - 800 m
5	>800 m - 1,000 m
1207	>1,000 m

The information above is based on the GRAS Risk Assessment.

### 3.3 Risk Assessment on the Presence of Indigenous People

GRAS analyses sources and datasets regarding the presence of indigenous people in production areas. In case specific maps are available, the provided geo-locations are analysed regarding the distance to designated areas. If respective maps are not available for the country of origin, GRAS uses statistical information to provide an indication of the presence of indigenous people (Article 10 2. (c) of the EUDR). Where appropriate data is available, GRAS provides a risk indication for the existence of duly reasoned claims by indigenous people. The user has the option to document existing consultation processes, by proving relevant documentation and explanations.

Art. 10 2. (c) the presence of indigenous peoples in the country of production or parts thereof;

Number of locations	Distance to Indigenous People
POLYGON	
1227	>1,500 m

The information above is based on the GRAS Risk Assessment.

### 3.4 Governance and Human Rights

Art. 10 2. (h) concerns in relation to the country of production and origin or parts thereof, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union.

Based on the evaluation of international statistics and datasets, GRAS developed a risk scoring method for the topics of corruption, lack of law enforcement, violations of human rights and sanctions, as indicated under Article 10 2. (h) of the EUDR. To cover the different aspects of human rights, GRAS separated this topic into 10 risk scores for child labour, worst forms of child labour, forced labour & modern slavery, occupational safety and health, freedom of association, unequal treatment in employment, withholding of adequate wages, causing harmful soil change, water pollution and noise emission, unlawful eviction and taking of land, forest, and waters and inappropriate use of private/public security forces. According to the evaluation of statistics and datasets, GRAS derived a risk score between 1 and 4, with the lowest number indicating a low risk and vice versa. The results of this abstract risk assessment are at national level and not commodity-specific. The only exceptions are the datasets for worst forms of child labour and forced labour.

Supporting documents can complement the risk evaluation if the data has regional/local scale, data is sector specific and data is from reliable sources, e.g. self-conducted audit by supplier or verified by third party schemes. In addition to the provision of additional information, risk mitigation can be implemented by setting up relevant company policies and procedures, or consultation and engagement with stakeholders on the ground.

Table 6: Risk scores of Human Rights Violation (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (h)	Child labour	1.98 (M)
10 2. (h)	Worst forms of child labour	1.50 (L)
10 2. (h)	Forced labour & Modern Slavery	2.00 (M)
10 2. (h)	Occupational safety and health	1.00 (L)
10 2. (h)	Freedom of association	4.00 (H)
10 2. (h)	Unequal treatment in employment	3.00 (S)
10 2. (h)	Withholding of adequate wages	4.00 (H)
10 2. (h)	Causing harmful soil change, water pollution and noise emission	2.25 (M)
10 2. (h)	Unlawful eviction and taking of land, forest, and waters	2.63 (S)

Oil Palm production in Colombia

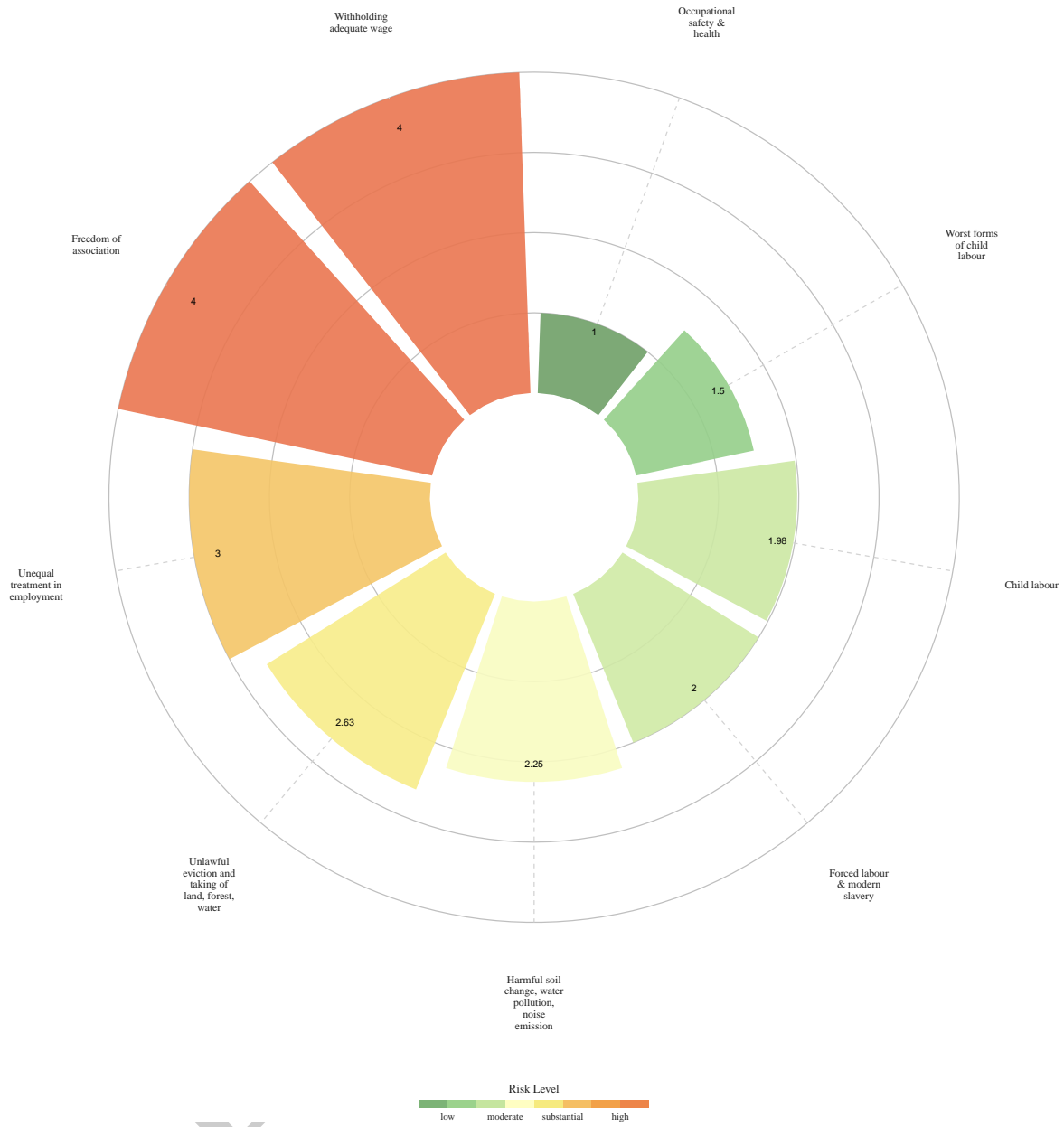


Figure 1: Risk Scores of Human Rights Violations

Table 7: Risk scores of Corruption and Law Enforcement Violation (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (h)	Level of corruption	2.77 (S)
10 2. (h)	Lack of law enforcement	2.41 (M)
10 2. (h)	Inappropriate use of private/public security forces	2.53 (S)
10 2. (h)	Armed conflict	1.00 (L)
10 2. (h)	Presence of sanctions imposed by the UN Security Council or the Council of the European Union	1.00 (L)

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Oil Palm production in Colombia

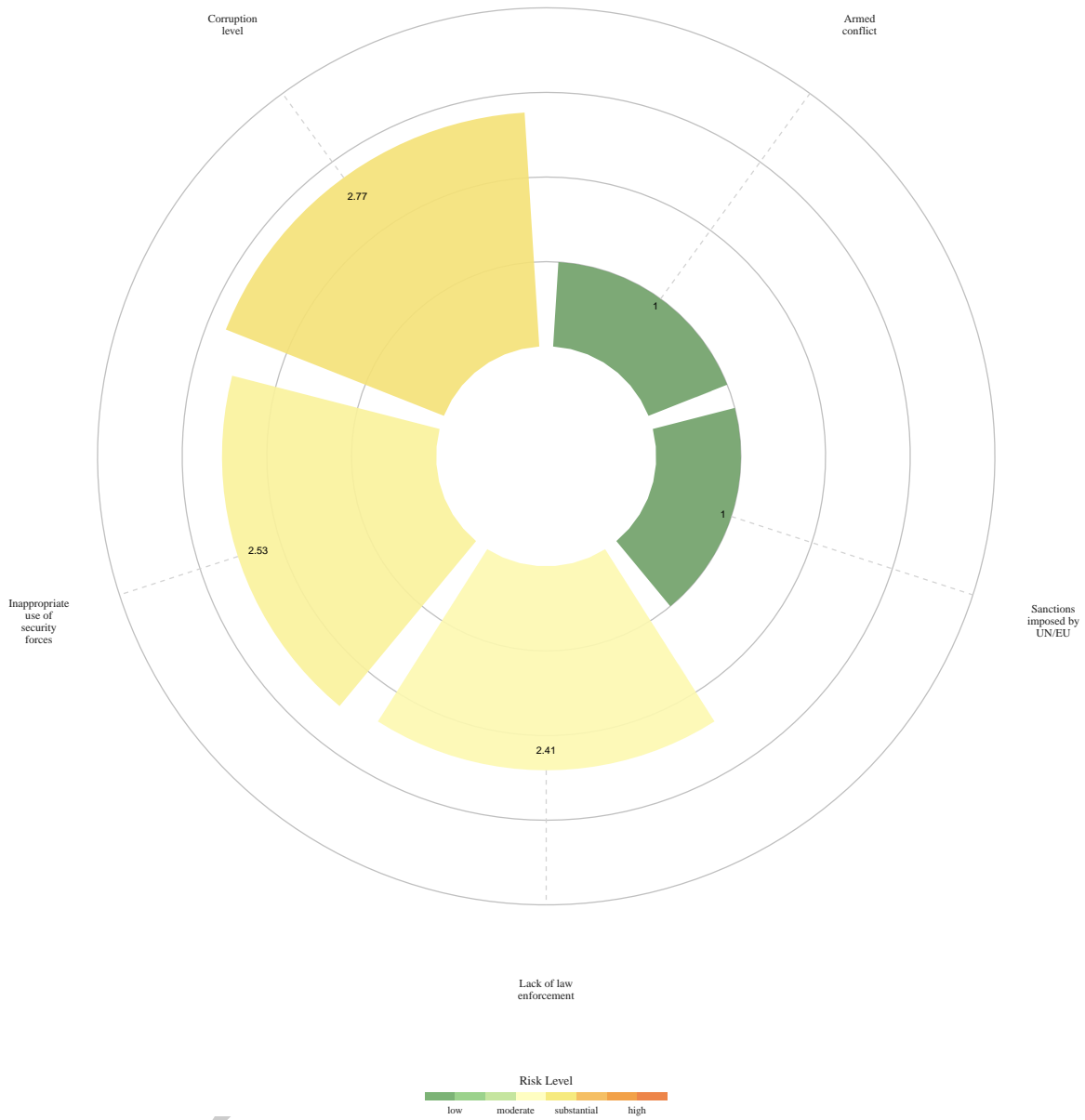


Figure 2: Risk Scores of Corruption and Law Enforcement Violation

Table 8: Risk scores regarding Indigenous People (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (c)	Presence of indigenous peoples in the country of production or parts thereof	Yes
10 2. (e)	The existence of duly reasoned claims by indigenous peoples based on objective and verifiable information	1.00 (L)

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Risk Levels for Oil Palm in Colombia

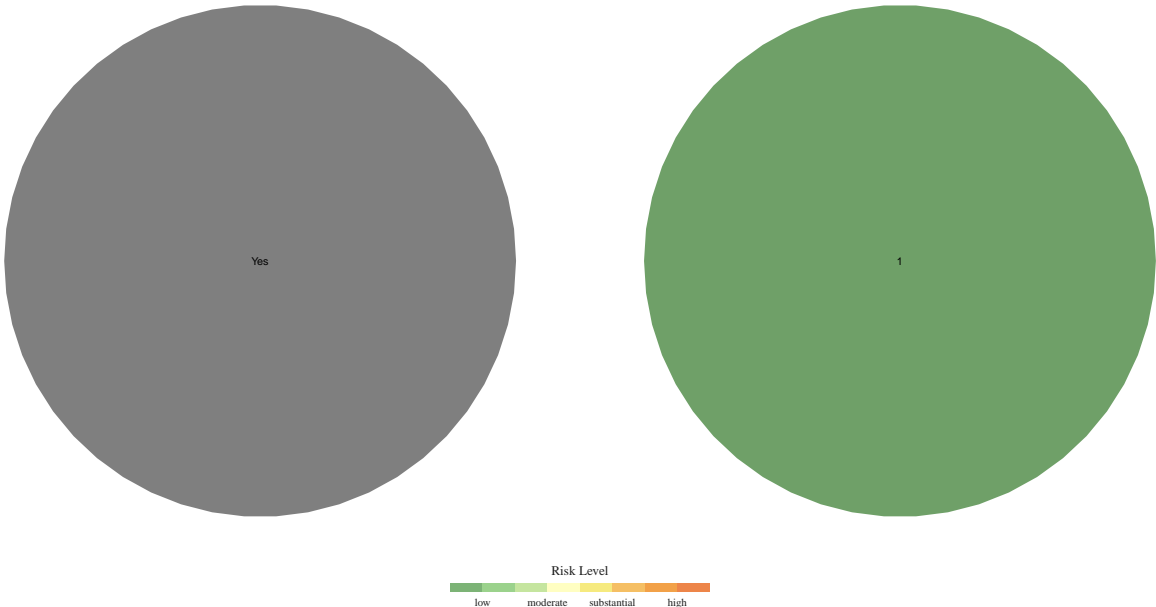


Figure 3: Risk Scores regarding Indigenous People

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# EUDR Compliance Assessment Report

Deforestation Check and Risk Assessment Results

Case Name: Gremca  
Company: Gremca (Daabon)  
User: ANA LUCIA AVILA SARMIENTO

Report for the automated risk assessment



A GRAS RISK ASSESSMENT  
REGULATION ON DEFORESTATION-FREE PRODUCTS  
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3.2.1 Risk Assessment on Presence of Forests . . . . . 6

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3.3 Risk Assessment on the Presence of Indigenous People . . . . . 7

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# 1 General Information

This report provides the results and documentation of the risk assessment which is required under Article 10 of the EUDR. The regulation requires operators to carry out this risk assessment on the information collected in accordance with Article 9. Operators shall not place the relevant products on the market or export them, except where the risk assessment reveals no or only a negligible risk that the relevant products are non-compliant <sup>1</sup>.

The methodological approaches of GRAS are non-exclusive and non-binding. GRAS takes no responsibility regarding the documents and information contributed by the user. The final conclusion of the risk assessment and mitigation measure to result in no or negligible risk has been taken by the user.

## General Case Details and Supplier Information

Case-ID	34655cb2-a55d-40c0-b6ee-78a5e5e7c830
Case Name	Gremca
User Name	ANA LUCIA AVILA SARMIENTO
Company Name	Gremca (Daabon)
Batch Description	Gremca y Nucleo
Contract Number	no aplica
Number of uploaded coordinates	0
Number of uploaded polygons	277

## Product Information

The following table contains the product specific information.

	Product 1	Product 2	Product 3
Product Type	Oil Palm	Oil Palm	Oil Palm
HS Code	1207 10	1511	1513 21
Production Period	09-2023 until 09-2024	09-2023 until 09-2024	09-2023 until 09-2024
DDS (previous)	-	-	-
Country(s)	Colombia	Colombia	Colombia

<sup>1</sup>Halleux, Vivienne. 2022. "Towards Deforestation-Free Commodities and Products in the EU." Technical report, EPRS: European Parliamentary Research Service.

## 2 Article 9: Information requirements

Operators shall collect information, documents and data which demonstrate that the relevant products comply with Article 3.

### 2.1 Result of Plausibility Check

All uploaded locations (point and/or polygons) were checked for validity and plausibility. The results of this check are summarized as follows:

<hr/>	
Number of uploaded point coordinates	
<hr/>	
Number of uploaded and valid coordinates:	0
Number of uploaded and valid polygons:	277
<hr/>	

### 2.2 Documentation of Deforestation-free Products

All uploaded locations (points and/or polygons) were checked for overlap with the GRAS forest-reference map of 2020. An overlap indicates a risk for deforestation of the location. It is recommended to complement the information by providing additional analysis and documentation, e.g. additional detailed analysis reporting based on high resolution imagery and time series analysis or on-site visits.

The results of this check are summarized as follows:

	Number of locations
<hr/>	
<b>POINT</b>	
<b>Number of valid point coordinates:</b>	<b>0</b>
Number of deforestation-free coordinates:	0
Number of coordinates overlapping with the deforestation layer (critical case):	0
<b>POLYGON</b>	
<b>Number of valid polygons:</b>	<b>277</b>
Number of deforestation-free polygons:	277
Number of polygons overlapping with the deforestation layer (critical case):	0
<hr/>	

The information above is based on the GRAS Risk Assessment.

### 3 Article 10: Risk assessment

Companies need to feed the information gathered under the scope of Article 9 into the risk assessment pillar of their Due Diligence Systems to verify and evaluate the risk of non-compliant products entering the supply chain, taking into account the criteria described in Article 10. Under the scope of Article 11, they need to take adequate and proportionate mitigation measures in case they find more than a negligible risk of non-compliance in order to make sure that the risk becomes negligible. The following sections provide the documentation given by the user to assess and document risks and mitigation measures according to the criteria described in Article 10 and 11.

#### 3.1 EU Benchmarking Results

Operators sourcing from standard and high risk countries or parts of countries are subject to the same standard due diligence obligations, including the collection of information, risk assessment and documentation of risk mitigation measure, as outlined in Article 8 of the EUDR. Operators sourcing commodities entirely from areas classified as low risk will be subject to simplified due diligence obligations. According to Article 13, they will need to collect information in line with Article 9, but they will not be required to assess and mitigate risks (Articles 10 and 11) unless the operator obtains or is made aware of any relevant information, including substantiated concerns submitted under Article 31, that would point to a risk that the relevant products do not comply with this Regulation (Article 13 2).

The results of the EU Benchmarking:

Country	EU Country Benchmark
Colombia	standard

## 3.2 Presence of Forests and Prevalence of Deforestation

In addition to the analysis of provided geolocations against the forest reference map (see Section 2.2), GRAS provides an assessment of the presence of forest and prevalence of deforestation in close distance to the geo-locations to indicate an additional risk factor of the general situation of the region. A risk indication does not contradict the verified deforestation-free status of the location itself. It rather provides an additional factor to consider in the general risk assessment and mitigation procedures. For example, it can help to monitor the quality of the geo-location themselves or collecting polygons in addition to point coordinates in areas with higher presence of forest and prevalence of deforestation.

### 3.2.1 Risk Assessment on Presence of Forests

Art. 10 2. (b) the **presence of forests** in the country of production or parts thereof;

Number of locations	Distance to Forest
POLYGON	
8	>0 - 250 m
11	>250 - 500 m
9	>500 m - 750 m
249	>750 m

The information above is based on the GRAS Risk Assessment.

### 3.2.2 Risk Assessment on Spread of Deforestation in immediate environment

Art. 10 2. (f) **prevalence of deforestation** or forest degradation in the country of production or parts thereof;

Number of locations	Distance to Deforestation
POLYGON	
4	>200 m - 400 m
2	>400 m - 600 m
8	>600 m - 800 m
4	>800 m - 1,000 m
259	>1,000 m

The information above is based on the GRAS Risk Assessment.

### 3.3 Risk Assessment on the Presence of Indigenous People

GRAS analyses sources and datasets regarding the presence of indigenous people in production areas. In case specific maps are available, the provided geo-locations are analysed regarding the distance to designated areas. If respective maps are not available for the country of origin, GRAS uses statistical information to provide an indication of the presence of indigenous people (Article 10 2. (c) of the EUDR). Where appropriate data is available, GRAS provides a risk indication for the existence of duly reasoned claims by indigenous people. The user has the option to document existing consultation processes, by proving relevant documentation and explanations.

Art. 10 2. (c) the presence of indigenous peoples in the country of production or parts thereof;

Number of locations	Distance to Indigenous People
POLYGON	
277	>1,500 m

The information above is based on the GRAS Risk Assessment.

### 3.4 Governance and Human Rights

Art. 10 2. (h) concerns in relation to the country of production and origin or parts thereof, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union.

Based on the evaluation of international statistics and datasets, GRAS developed a risk scoring method for the topics of corruption, lack of law enforcement, violations of human rights and sanctions, as indicated under Article 10 2. (h) of the EUDR. To cover the different aspects of human rights, GRAS separated this topic into 10 risk scores for child labour, worst forms of child labour, forced labour & modern slavery, occupational safety and health, freedom of association, unequal treatment in employment, withholding of adequate wages, causing harmful soil change, water pollution and noise emission, unlawful eviction and taking of land, forest, and waters and inappropriate use of private/public security forces. According to the evaluation of statistics and datasets, GRAS derived a risk score between 1 and 4, with the lowest number indicating a low risk and vice versa. The results of this abstract risk assessment are at national level and not commodity-specific. The only exceptions are the datasets for worst forms of child labour and forced labour.

Supporting documents can complement the risk evaluation if the data has regional/local scale, data is sector specific and data is from reliable sources, e.g. self-conducted audit by supplier or verified by third party schemes. In addition to the provision of additional information, risk mitigation can be implemented by setting up relevant company policies and procedures, or consultation and engagement with stakeholders on the ground.

Table 6: Risk scores of Human Rights Violation (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (h)	Child labour	1.98 (M)
10 2. (h)	Worst forms of child labour	1.50 (L)
10 2. (h)	Forced labour & Modern Slavery	2.00 (M)
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10 2. (h)	Freedom of association	4.00 (H)
10 2. (h)	Unequal treatment in employment	3.00 (S)
10 2. (h)	Withholding of adequate wages	4.00 (H)
10 2. (h)	Causing harmful soil change, water pollution and noise emission	2.25 (M)
10 2. (h)	Unlawful eviction and taking of land, forest, and waters	2.63 (S)

Oil Palm production in Colombia

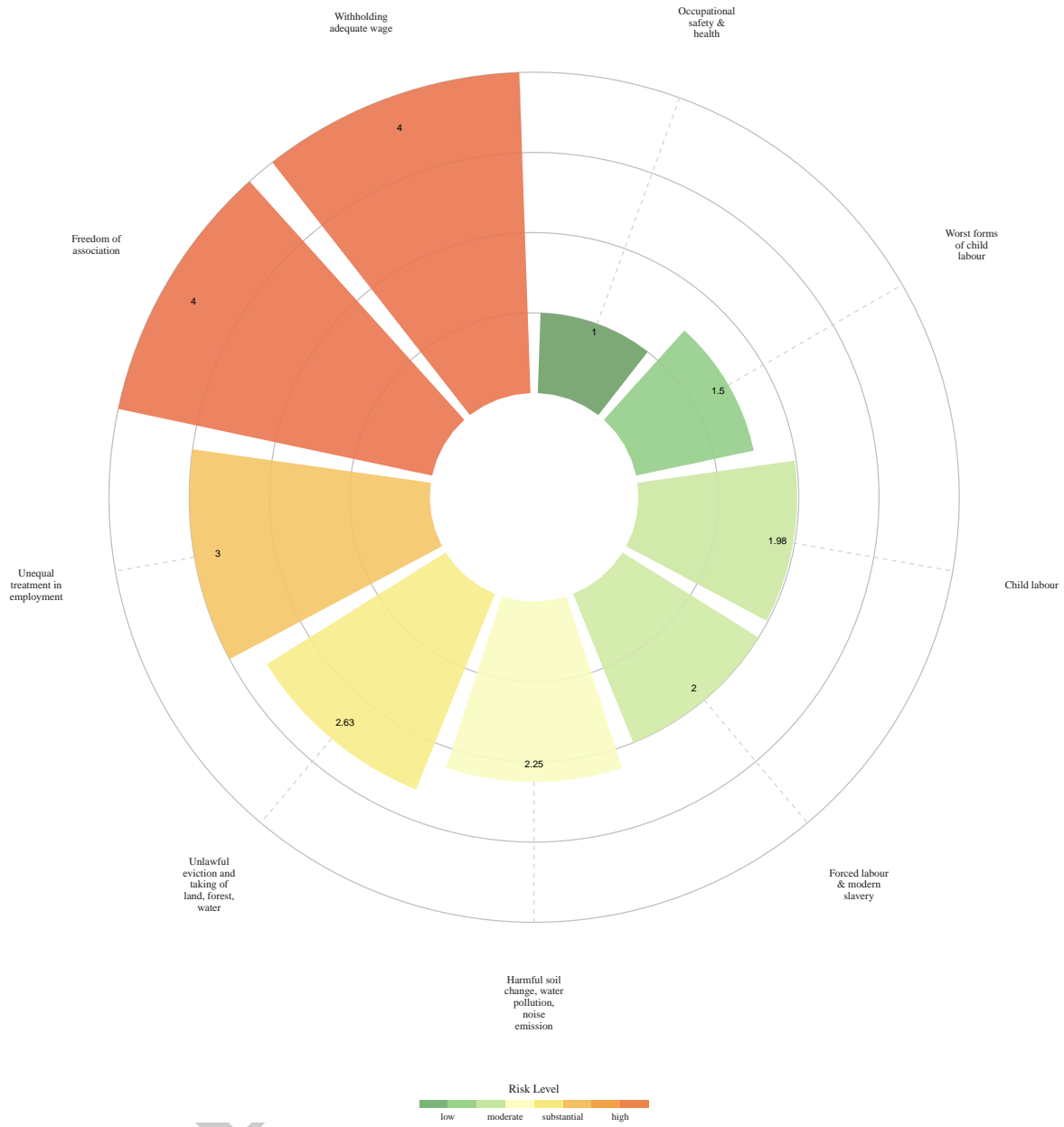


Figure 1: Risk Scores of Human Rights Violations

Table 7: Risk scores of Corruption and Law Enforcement Violation (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (h)	Level of corruption	2.77 (S)
10 2. (h)	Lack of law enforcement	2.41 (M)
10 2. (h)	Inappropriate use of private/public security forces	2.53 (S)
10 2. (h)	Armed conflict	1.00 (L)
10 2. (h)	Presence of sanctions imposed by the UN Security Council or the Council of the European Union	1.00 (L)

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Oil Palm production in Colombia

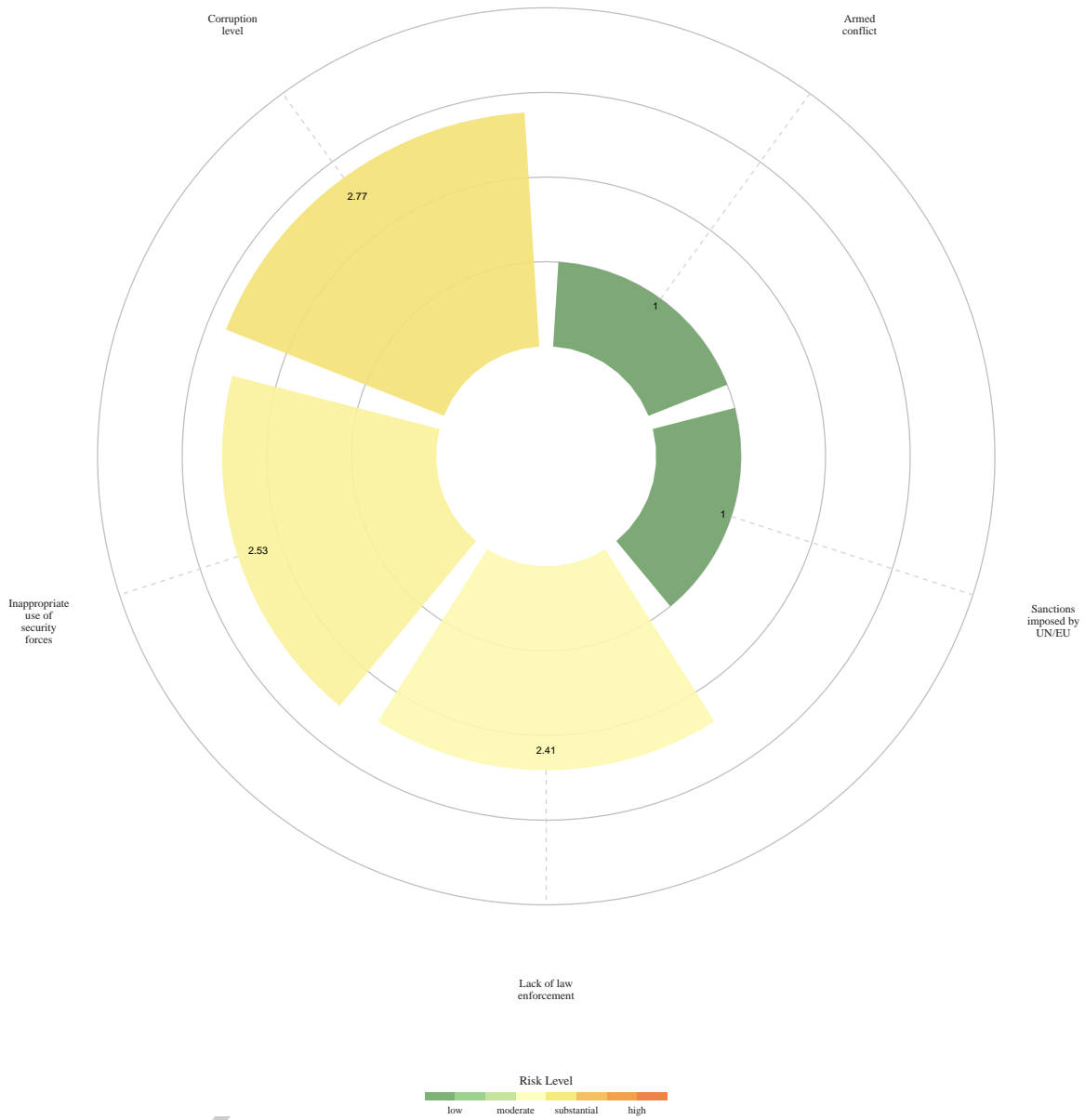


Figure 2: Risk Scores of Corruption and Law Enforcement Violation

Table 8: Risk scores regarding Indigenous People (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (c)	Presence of indigenous peoples in the country of production or parts thereof	Yes
10 2. (e)	The existence of duly reasoned claims by indigenous peoples based on objective and verifiable information	1.00 (L)

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Risk Levels for Oil Palm in Colombia

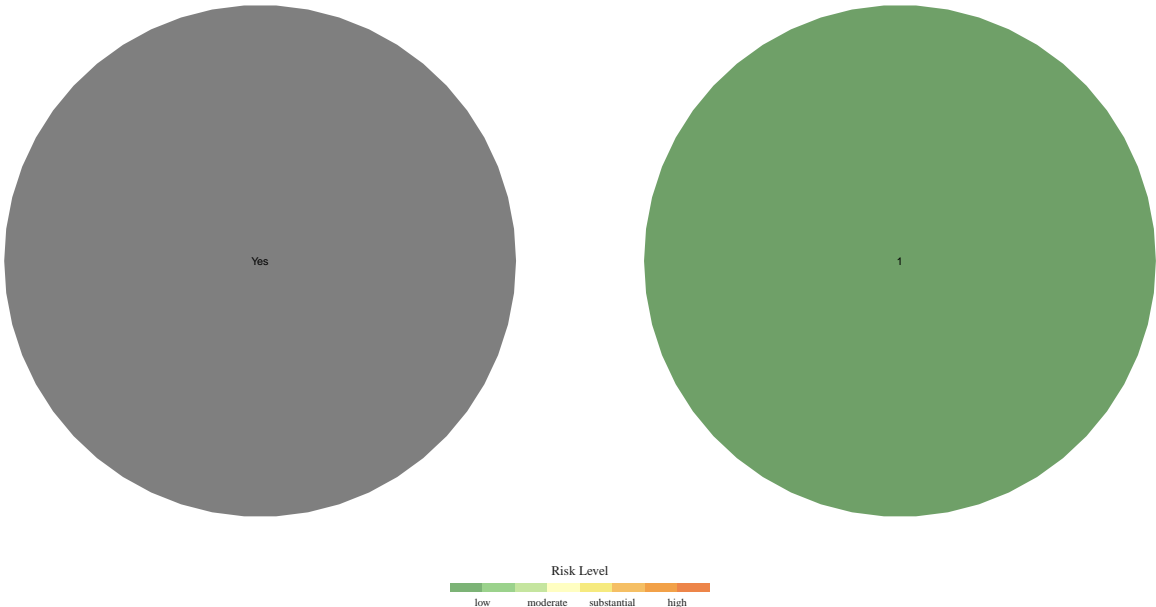


Figure 3: Risk Scores regarding Indigenous People

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# EUDR Compliance Assessment Report

Deforestation Check and Risk Assessment Results

Case Name: Palnorte  
Company: Gremca (Daabon)  
User: Grupo Daabon

Report for the automated risk assessment



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User Name	Grupo Daabon
Company Name	Gremca (Daabon)
Batch Description	PALM OIL AND ITS FRACTIONS
Contract Number	000000
Number of uploaded coordinates	0
Number of uploaded polygons	1165

## Product Information

The following table contains the product specific information.

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HS Code	1511
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DDS (previous)	-
Country(s)	Colombia

<sup>1</sup>Halleux, Vivienne. 2022. "Towards Deforestation-Free Commodities and Products in the EU." Technical report, EPRS: European Parliamentary Research Service.

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Number of uploaded and valid coordinates:	0
Number of uploaded and valid polygons:	1165
<hr/>	

### 2.2 Documentation of Deforestation-free Products

All uploaded locations (points and/or polygons) were checked for overlap with the GRAS forest-reference map of 2020. An overlap indicates a risk for deforestation of the location. It is recommended to complement the information by providing additional analysis and documentation, e.g. additional detailed analysis reporting based on high resolution imagery and time series analysis or on-site visits.

The results of this check are summarized as follows:

	Number of locations
<hr/>	
<b>POINT</b>	
<b>Number of valid point coordinates:</b>	<b>0</b>
Number of deforestation-free coordinates:	0
Number of coordinates overlapping with the deforestation layer (critical case):	0
<b>POLYGON</b>	
<b>Number of valid polygons:</b>	<b>1165</b>
Number of deforestation-free polygons:	1165
Number of polygons overlapping with the deforestation layer (critical case):	0
<hr/>	

The information above is based on the GRAS Risk Assessment.

### 3 Article 10: Risk assessment

Companies need to feed the information gathered under the scope of Article 9 into the risk assessment pillar of their Due Diligence Systems to verify and evaluate the risk of non-compliant products entering the supply chain, taking into account the criteria described in Article 10. Under the scope of Article 11, they need to take adequate and proportionate mitigation measures in case they find more than a negligible risk of non-compliance in order to make sure that the risk becomes negligible. The following sections provide the documentation given by the user to assess and document risks and mitigation measures according to the criteria described in Article 10 and 11.

#### 3.1 EU Benchmarking Results

Operators sourcing from standard and high risk countries or parts of countries are subject to the same standard due diligence obligations, including the collection of information, risk assessment and documentation of risk mitigation measure, as outlined in Article 8 of the EUDR. Operators sourcing commodities entirely from areas classified as low risk will be subject to simplified due diligence obligations. According to Article 13, they will need to collect information in line with Article 9, but they will not be required to assess and mitigate risks (Articles 10 and 11) unless the operator obtains or is made aware of any relevant information, including substantiated concerns submitted under Article 31, that would point to a risk that the relevant products do not comply with this Regulation (Article 13 2).

The results of the EU Benchmarking:

Country	EU Country Benchmark
Colombia	standard

## 3.2 Presence of Forests and Prevalence of Deforestation

In addition to the analysis of provided geolocations against the forest reference map (see Section 2.2), GRAS provides an assessment of the presence of forest and prevalence of deforestation in close distance to the geo-locations to indicate an additional risk factor of the general situation of the region. A risk indication does not contradict the verified deforestation-free status of the location itself. It rather provides an additional factor to consider in the general risk assessment and mitigation procedures. For example, it can help to monitor the quality of the geo-location themselves or collecting polygons in addition to point coordinates in areas with higher presence of forest and prevalence of deforestation.

### 3.2.1 Risk Assessment on Presence of Forests

Art. 10 2. (b) the **presence of forests** in the country of production or parts thereof;

Number of locations	Distance to Forest
POLYGON	
66	overlap
388	>0 - 250 m
219	>250 - 500 m
162	>500 m - 750 m
330	>750 m

The information above is based on the GRAS Risk Assessment.

### 3.2.2 Risk Assessment on Spread of Deforestation in immediate environment

Art. 10 2. (f) **prevalence of deforestation** or forest degradation in the country of production or parts thereof;

Number of locations	Distance to Deforestation
POLYGON	
170	>0 - 200 m
164	>200 m - 400 m
136	>400 m - 600 m
116	>600 m - 800 m
118	>800 m - 1,000 m
461	>1,000 m

The information above is based on the GRAS Risk Assessment.

### 3.3 Risk Assessment on the Presence of Indigenous People

GRAS analyses sources and datasets regarding the presence of indigenous people in production areas. In case specific maps are available, the provided geo-locations are analysed regarding the distance to designated areas. If respective maps are not available for the country of origin, GRAS uses statistical information to provide an indication of the presence of indigenous people (Article 10 2. (c) of the EUDR). Where appropriate data is available, GRAS provides a risk indication for the existence of duly reasoned claims by indigenous people. The user has the option to document existing consultation processes, by proving relevant documentation and explanations.

Art. 10 2. (c) the presence of indigenous peoples in the country of production or parts thereof;

Number of locations	Distance to Indigenous People
POLYGON	
1165	>1,500 m

The information above is based on the GRAS Risk Assessment.

### 3.4 Governance and Human Rights

Art. 10 2. (h) concerns in relation to the country of production and origin or parts thereof, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union.

Based on the evaluation of international statistics and datasets, GRAS developed a risk scoring method for the topics of corruption, lack of law enforcement, violations of human rights and sanctions, as indicated under Article 10 2. (h) of the EUDR. To cover the different aspects of human rights, GRAS separated this topic into 10 risk scores for child labour, worst forms of child labour, forced labour & modern slavery, occupational safety and health, freedom of association, unequal treatment in employment, withholding of adequate wages, causing harmful soil change, water pollution and noise emission, unlawful eviction and taking of land, forest, and waters and inappropriate use of private/public security forces. According to the evaluation of statistics and datasets, GRAS derived a risk score between 1 and 4, with the lowest number indicating a low risk and vice versa. The results of this abstract risk assessment are at national level and not commodity-specific. The only exceptions are the datasets for worst forms of child labour and forced labour.

Supporting documents can complement the risk evaluation if the data has regional/local scale, data is sector specific and data is from reliable sources, e.g. self-conducted audit by supplier or verified by third party schemes. In addition to the provision of additional information, risk mitigation can be implemented by setting up relevant company policies and procedures, or consultation and engagement with stakeholders on the ground.

Table 6: Risk scores of Human Rights Violation (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (h)	Child labour	1.98 (M)
10 2. (h)	Worst forms of child labour	1.50 (L)
10 2. (h)	Forced labour & Modern Slavery	2.00 (M)
10 2. (h)	Occupational safety and health	1.00 (L)
10 2. (h)	Freedom of association	4.00 (H)
10 2. (h)	Unequal treatment in employment	3.00 (S)
10 2. (h)	Withholding of adequate wages	4.00 (H)
10 2. (h)	Causing harmful soil change, water pollution and noise emission	2.25 (M)
10 2. (h)	Unlawful eviction and taking of land, forest, and waters	2.63 (S)

Oil Palm production in Colombia

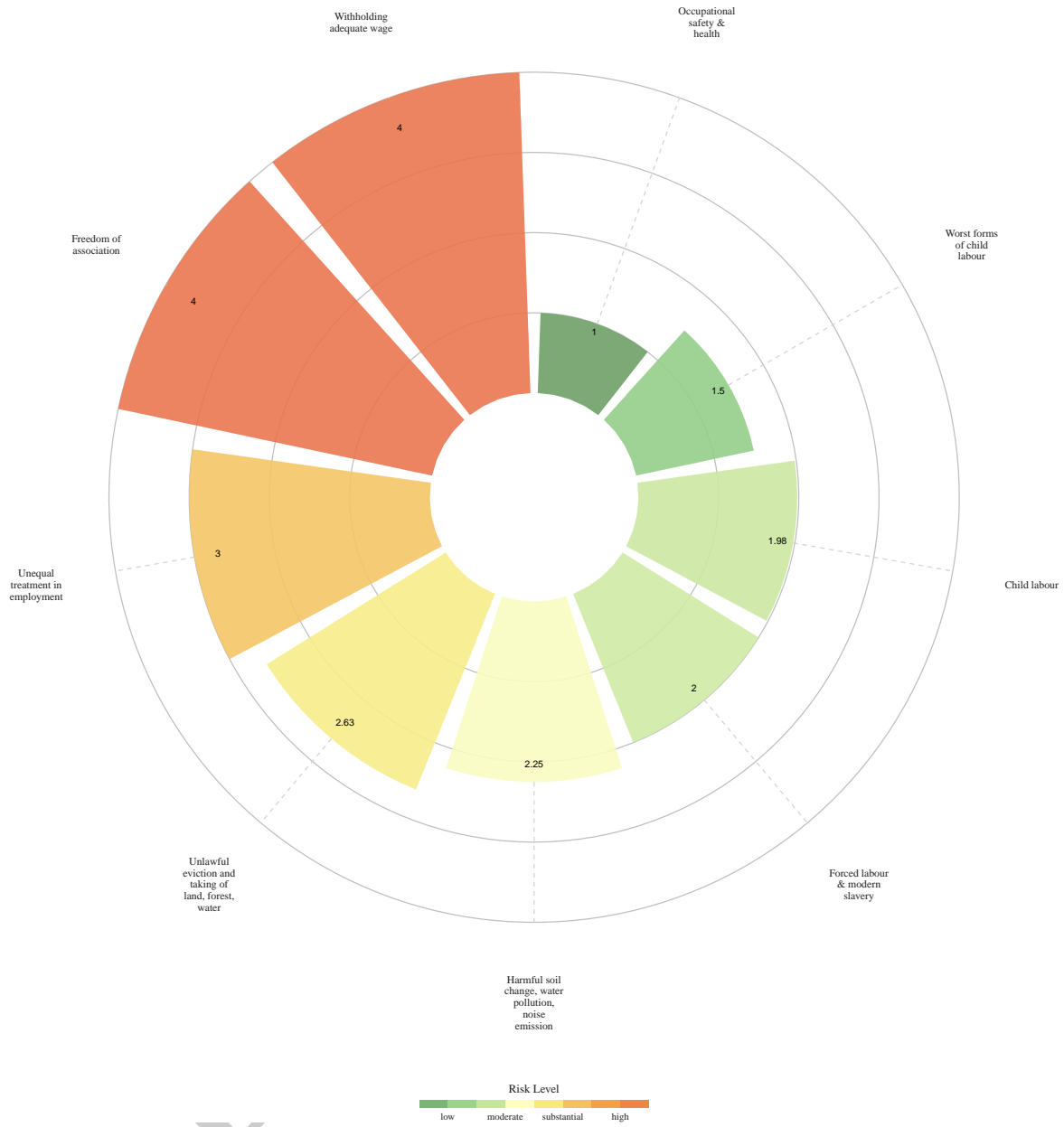


Figure 1: Risk Scores of Human Rights Violations

Table 7: Risk scores of Corruption and Law Enforcement Violation (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (h)	Level of corruption	2.77 (S)
10 2. (h)	Lack of law enforcement	2.41 (M)
10 2. (h)	Inappropriate use of private/public security forces	2.53 (S)
10 2. (h)	Armed conflict	1.00 (L)
10 2. (h)	Presence of sanctions imposed by the UN Security Council or the Council of the European Union	1.00 (L)

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Oil Palm production in Colombia

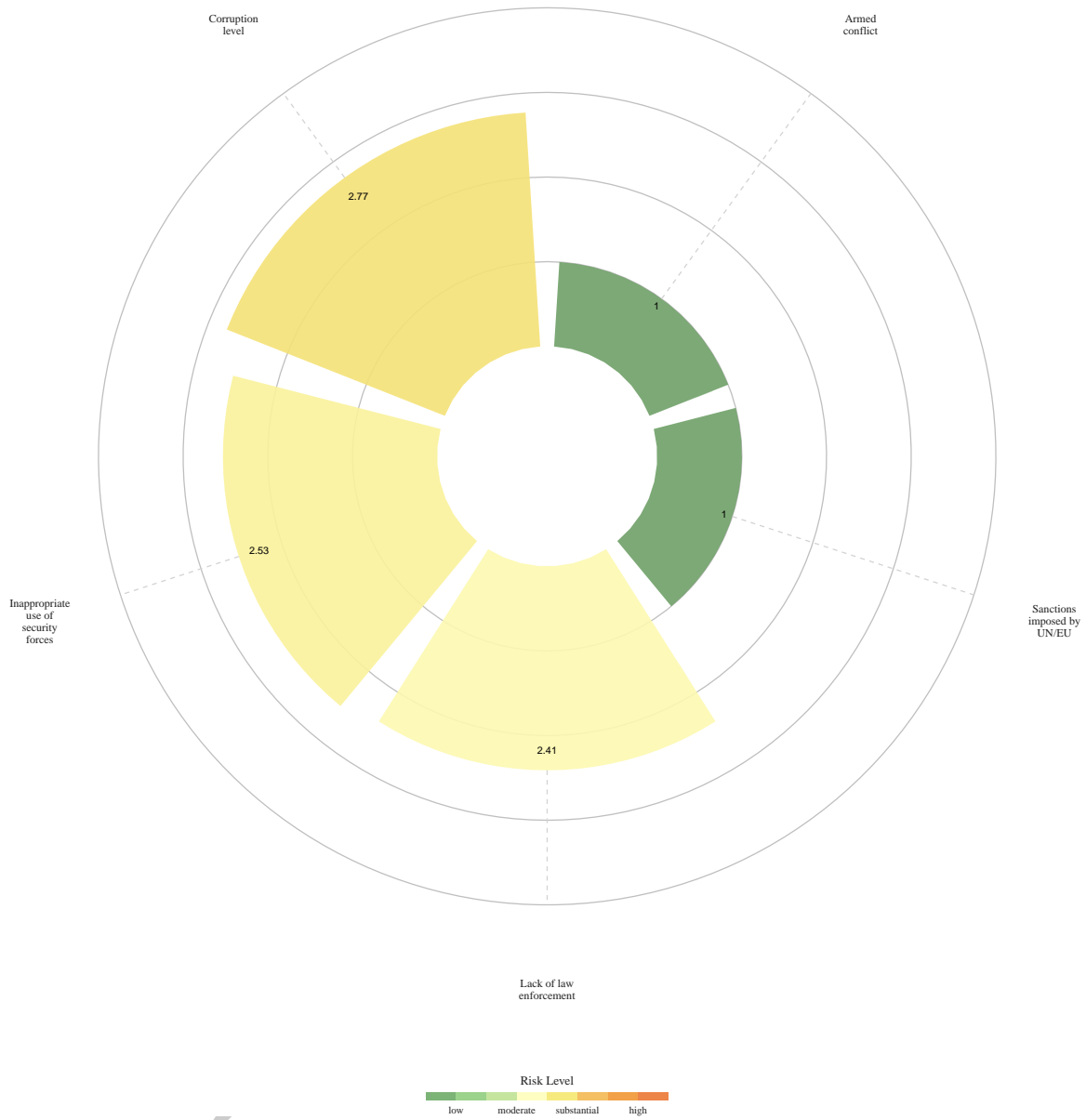


Figure 2: Risk Scores of Corruption and Law Enforcement Violation

Table 8: Risk scores regarding Indigenous People (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (c)	Presence of indigenous peoples in the country of production or parts thereof	Yes
10 2. (e)	The existence of duly reasoned claims by indigenous peoples based on objective and verifiable information	1.00 (L)

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Risk Levels for Oil Palm in Colombia

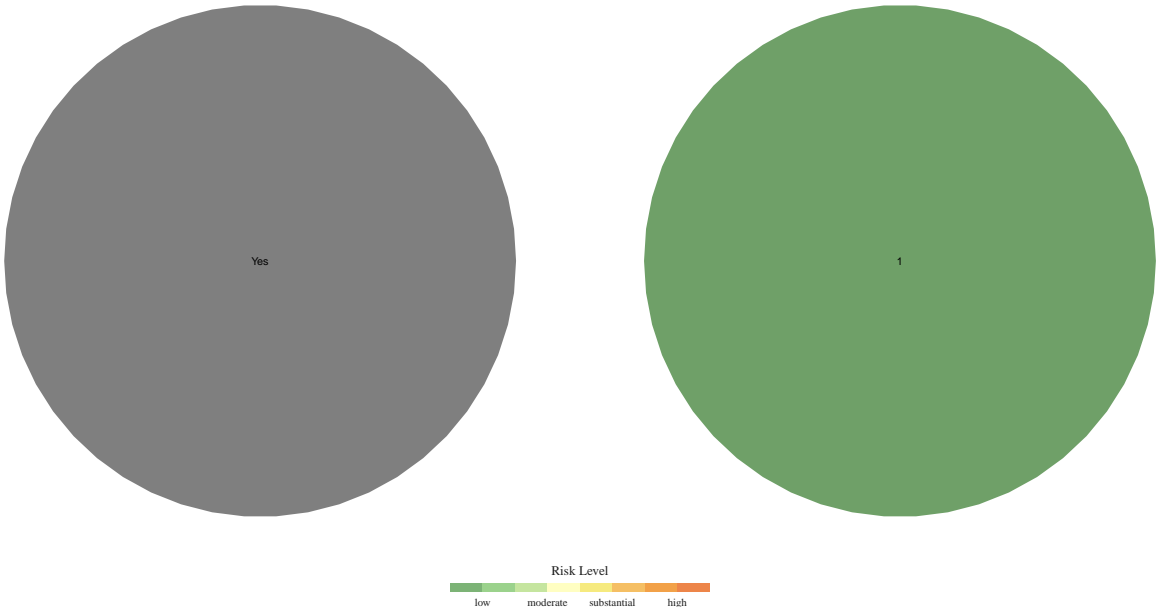


Figure 3: Risk Scores regarding Indigenous People

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# EUDR Compliance Assessment Report

Deforestation Check and Risk Assessment Results

Case Name: Palmaceites  
Company: Gremca (Daabon)  
User: Grupo Daabon

Report for the automated risk assessment



A GRAS RISK ASSESSMENT  
REGULATION ON DEFORESTATION-FREE PRODUCTS  
REPORT

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# 1 General Information

This report provides the results and documentation of the risk assessment which is required under Article 10 of the EUDR. The regulation requires operators to carry out this risk assessment on the information collected in accordance with Article 9. Operators shall not place the relevant products on the market or export them, except where the risk assessment reveals no or only a negligible risk that the relevant products are non-compliant <sup>1</sup>.

The methodological approaches of GRAS are non-exclusive and non-binding. GRAS takes no responsibility regarding the documents and information contributed by the user. The final conclusion of the risk assessment and mitigation measure to result in no or negligible risk has been taken by the user.

## General Case Details and Supplier Information

Case-ID	4d0710a0-7a41-4027-81b4-c0e043699c5b
Case Name	Palmaceites
User Name	Grupo Daabon
Company Name	Gremca (Daabon)
Batch Description	PALM OIL AND ITS FRACTIONS
Contract Number	000000
Number of uploaded coordinates	0
Number of uploaded polygons	49

## Product Information

The following table contains the product specific information.

Product 1	
Product Type	Oil Palm
HS Code	1511
Production Period	01-2020 until 10-2024
DDS (previous)	-
Country(s)	Colombia

<sup>1</sup>Halleux, Vivienne. 2022. "Towards Deforestation-Free Commodities and Products in the EU." Technical report, EPRS: European Parliamentary Research Service.

## 2 Article 9: Information requirements

Operators shall collect information, documents and data which demonstrate that the relevant products comply with Article 3.

### 2.1 Result of Plausibility Check

All uploaded locations (point and/or polygons) were checked for validity and plausibility. The results of this check are summarized as follows:

<hr/>	
Number of uploaded point coordinates	
Number of uploaded and valid coordinates:	0
Number of uploaded and valid polygons:	49
<hr/>	

### 2.2 Documentation of Deforestation-free Products

All uploaded locations (points and/or polygons) were checked for overlap with the GRAS forest-reference map of 2020. An overlap indicates a risk for deforestation of the location. It is recommended to complement the information by providing additional analysis and documentation, e.g. additional detailed analysis reporting based on high resolution imagery and time series analysis or on-site visits.

The results of this check are summarized as follows:

	Number of locations
<hr/>	
<b>POINT</b>	
<b>Number of valid point coordinates:</b>	<b>0</b>
Number of deforestation-free coordinates:	0
Number of coordinates overlapping with the deforestation layer (critical case):	0
<b>POLYGON</b>	
<b>Number of valid polygons:</b>	<b>49</b>
Number of deforestation-free polygons:	49
Number of polygons overlapping with the deforestation layer (critical case):	0
<hr/>	

The information above is based on the GRAS Risk Assessment.

### 3 Article 10: Risk assessment

Companies need to feed the information gathered under the scope of Article 9 into the risk assessment pillar of their Due Diligence Systems to verify and evaluate the risk of non-compliant products entering the supply chain, taking into account the criteria described in Article 10. Under the scope of Article 11, they need to take adequate and proportionate mitigation measures in case they find more than a negligible risk of non-compliance in order to make sure that the risk becomes negligible. The following sections provide the documentation given by the user to assess and document risks and mitigation measures according to the criteria described in Article 10 and 11.

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Operators sourcing from standard and high risk countries or parts of countries are subject to the same standard due diligence obligations, including the collection of information, risk assessment and documentation of risk mitigation measure, as outlined in Article 8 of the EUDR. Operators sourcing commodities entirely from areas classified as low risk will be subject to simplified due diligence obligations. According to Article 13, they will need to collect information in line with Article 9, but they will not be required to assess and mitigate risks (Articles 10 and 11) unless the operator obtains or is made aware of any relevant information, including substantiated concerns submitted under Article 31, that would point to a risk that the relevant products do not comply with this Regulation (Article 13 2).

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#### 3.2.1 Risk Assessment on Presence of Forests

Art. 10 2. (b) the **presence of forests** in the country of production or parts thereof;

Number of locations	Distance to Forest
POLYGON	
1	overlap
3	>0 - 250 m
4	>250 - 500 m
3	>500 m - 750 m
38	>750 m

The information above is based on the GRAS Risk Assessment.

#### 3.2.2 Risk Assessment on Spread of Deforestation in immediate environment

Art. 10 2. (f) **prevalence of deforestation** or forest degradation in the country of production or parts thereof;

Number of locations	Distance to Deforestation
POLYGON	
1	>200 m - 400 m
1	>400 m - 600 m
47	>1,000 m

The information above is based on the GRAS Risk Assessment.

### 3.3 Risk Assessment on the Presence of Indigenous People

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Number of locations	Distance to Indigenous People
POLYGON	
49	>1,500 m

The information above is based on the GRAS Risk Assessment.

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### 3.4 Governance and Human Rights

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10 2. (h)	Freedom of association	4.00 (H)
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10 2. (h)	Causing harmful soil change, water pollution and noise emission	2.25 (M)
10 2. (h)	Unlawful eviction and taking of land, forest, and waters	2.63 (S)

Oil Palm production in Colombia

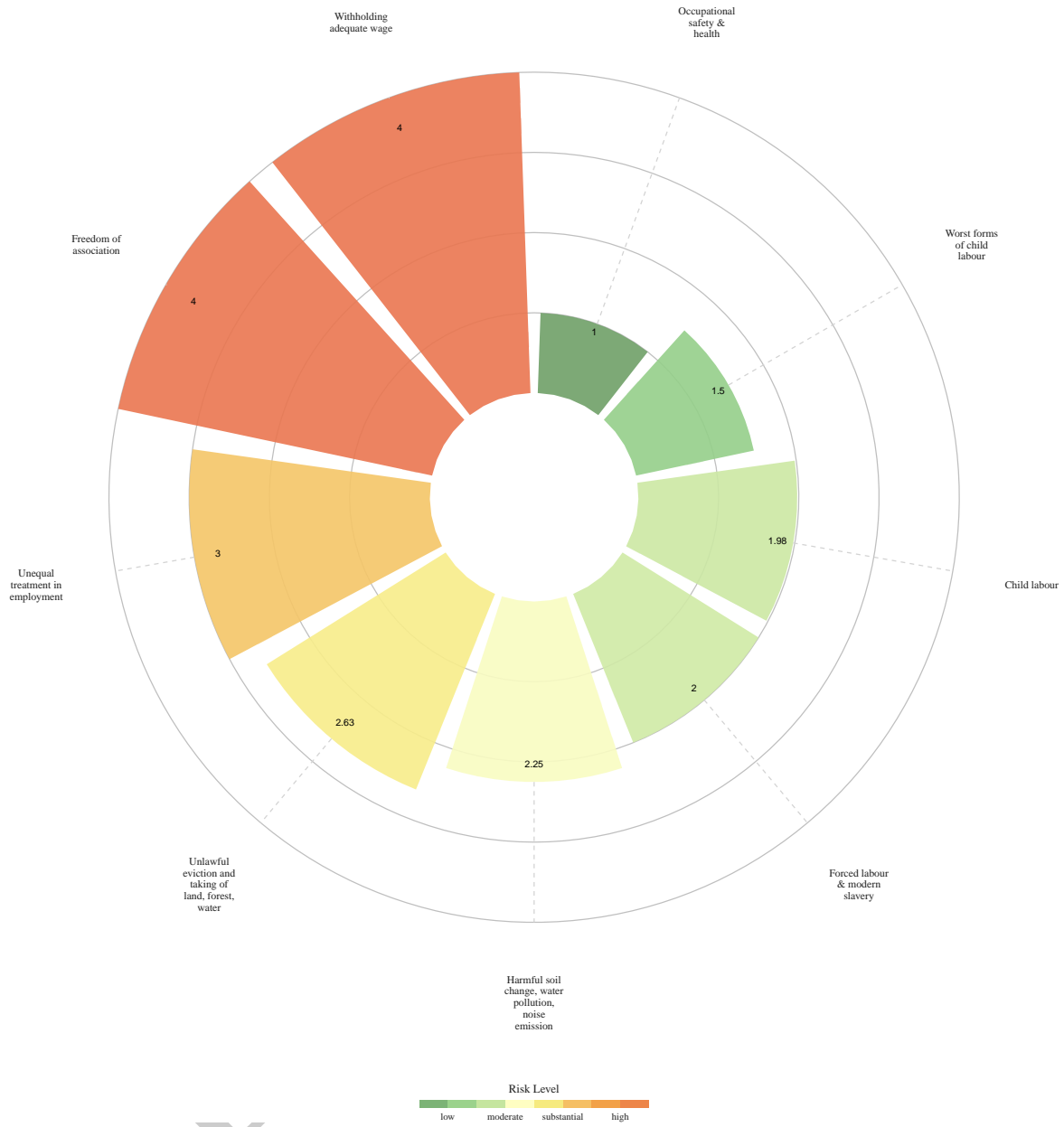


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10 2. (h)	Inappropriate use of private/public security forces	2.53 (S)
10 2. (h)	Armed conflict	1.00 (L)
10 2. (h)	Presence of sanctions imposed by the UN Security Council or the Council of the European Union	1.00 (L)

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Oil Palm production in Colombia

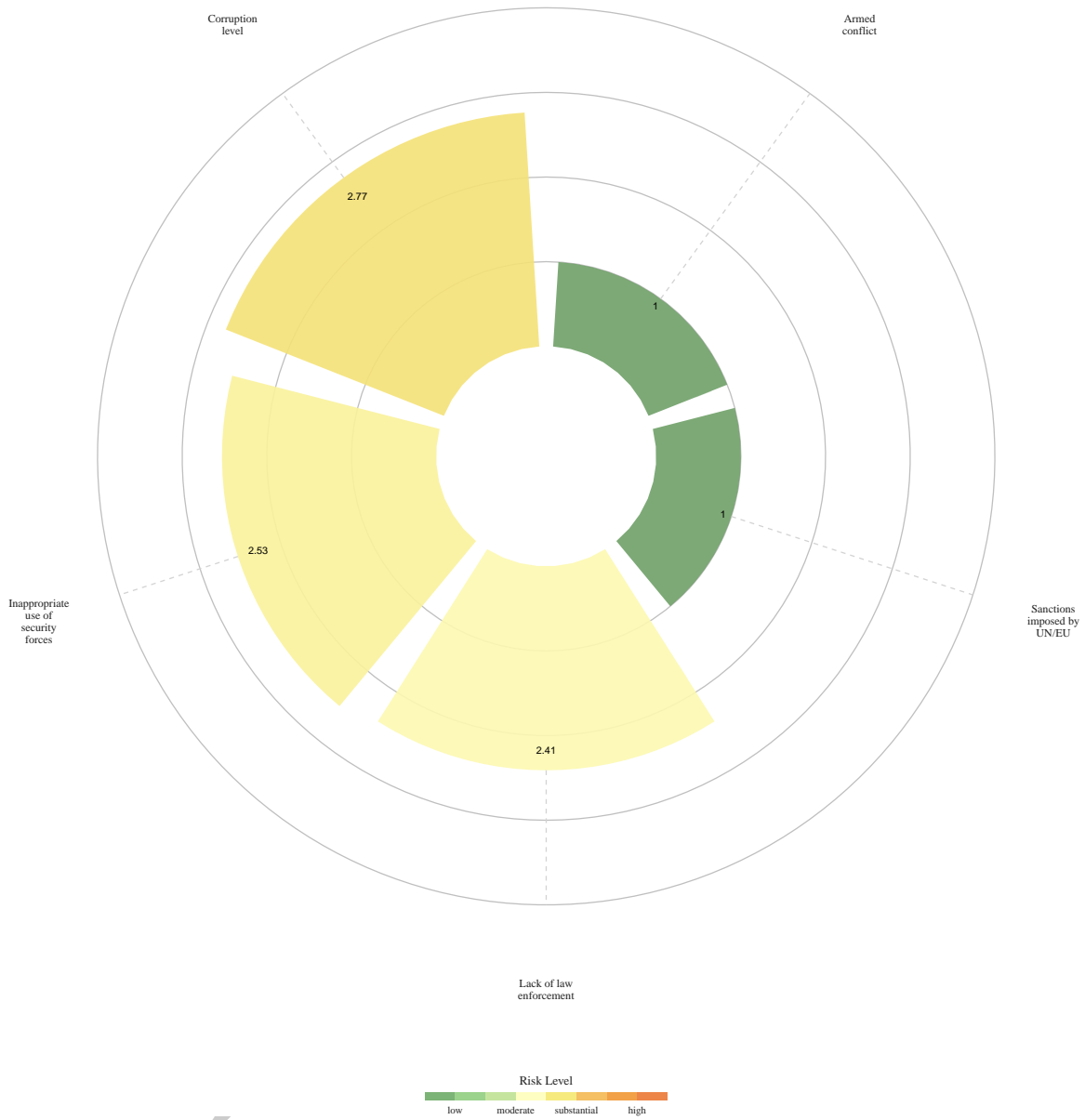


Figure 2: Risk Scores of Corruption and Law Enforcement Violation

Table 8: Risk scores regarding Indigenous People (Risk level classified into L: Low, M: Moderate, S: Substantial, H: High)

Article	Description	Colombia
		Oil Palm
10 2. (c)	Presence of indigenous peoples in the country of production or parts thereof	Yes
10 2. (e)	The existence of duly reasoned claims by indigenous peoples based on objective and verifiable information	1.00 (L)

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Risk Levels for Oil Palm in Colombia

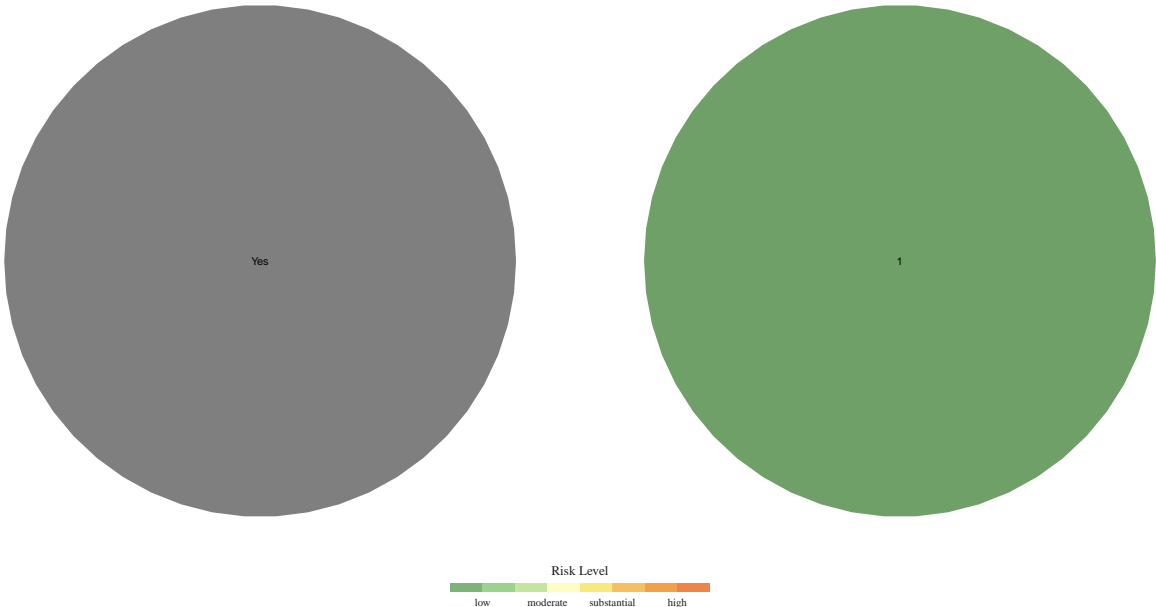


Figure 3: Risk Scores regarding Indigenous People

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