

Product Requirements Document: EUDR Legality Assessment Form

Objective

The online form centralizes the EU Deforestation Regulation's "legal production" due-diligence requirements into a structured audit tool. It must help internal auditors gather verifiable evidence that each supplier's product complies with local laws across all relevant categories. EUDR mandates that operators demonstrate – "through verifiable data and supporting documentation" – that products were lawfully produced ¹. In practice this means documenting compliance with the eight legality indicators defined in EUDR Article 2 (land use, environmental, forest, third-party, labour, human rights, FPIC, tax/anti-corruption) ². The system will guide auditors through each category, ensure required fields are completed, and capture all necessary PDFs so the company can compile its due-diligence statement. Data collected will map to EUDR's Annex I requirements (e.g. operator and plot details) and can be exported into the EU's due-diligence information system ³ ¹.

Form Structure

- **Supplier/Business Details:** Common top section where the auditor selects the supplier type (Estate, Mill, Bulking Station, KCP/branch, Smallholder, etc.), and enters core info (name, ID, location, ownership, contact details). The chosen type drives form logic (see *Logic & Validation*). This ensures fields can be shown/hidden by supplier category.
- **Indicator Sections:** The form is divided into eight main sections matching the EUDR legality categories (Land Tenure, Environmental Laws, Forest-Related Regulations, Third-Party Rights (including FPIC), Labour, Human Rights, Tax/Anti-Corruption, Other National Laws) ². Each section has a header and contains specific data fields and a PDF upload control. For example:
 - **Land Tenure:** Fields for land title/license number, tenure type (private, state, customary), land use classification, area (ha), and geolocation or plot map. Auditors can upload deed certificates or license documents (PDF).
 - **Environmental Laws:** Fields for environmental permit IDs – e.g. AMDAL (Impact Assessment) number if required, or SPPL (Environmental Management & Monitoring Letter) ID. (Indonesian law requires small plantations to use SPPL instead of AMDAL.) Auditors upload any environmental permits or SPPL certificates ⁴.
 - **Forest-Related Regulations:** Fields for forest concession or utilization licenses (e.g. IUPHHK/PHPL in Indonesia), clearance letters, protected area status. Upload forest management or biodiversity compliance documents if applicable.
 - **Third-Party Rights:** Fields capturing any overlapping rights or disputes (e.g. number of documented claims, dispute status). Include whether indigenous or community land is involved. Upload FPIC agreement documents or community consent letters. (Free, Prior and Informed Consent is explicitly required for customary land ⁵.)
 - **Labour:** Fields for workforce size, type of employment (permanent, contractor), copies of worker contracts or collective bargaining agreements. Include fields for social security registration numbers

(BPJS Ketenagakerjaan and Kesehatan in Indonesia) ⁶ . Upload proof of BPJS registration or safety certificates (K3).

- **Human Rights:** Fields to note any human rights concerns or grievance mechanisms. Upload any certifications or assessments related to international human-rights standards (this section may be largely policy-check, since ISPO has no specific HR indicators).
- **Tax/Anti-Corruption:** Fields for tax ID (NPWP) and proof of tax compliance (e.g. receipts for PBB/PPN/PPH). Fields for anti-corruption: existence of an anti-bribery policy, code of ethics, whistleblower mechanism. Upload copies of NPWP card or tax returns. NPWP is mandatory for formal businesses ⁷ (optional for informal suppliers).
- **Other National Laws:** A catch-all for any additional legal requirements (e.g. trade/export permits, corporate registration, customs registration numbers). Upload any remaining legal documents (e.g. company business license, Dinas Pertanian registry, etc.).

Each section clearly labels mandatory versus optional fields. Section headers and field groupings provide context. Tooltips or help text explain each field (e.g. “Enter the 16-digit NPWP number” or “Upload site GPS map PDF”). The overall structure can be one long scroll or step-by-step pages/tabs – whichever maximizes clarity – but must keep related items grouped by indicator.

Data Fields

For each legality indicator, the form includes specific fields reflecting existing compliance practices:

- **Land Tenure:** Land title/certificate number; date of title issuance; type of tenure (HGU/HGB, state forest permit, customary land notice); land area (ha); GPS coordinates or digital plot map reference. *Example:* “HGU# 02.03/xxx-2010”.
- **Environmental:** AMDAL permit number or SPPL ID (for smallholders) ⁴ ; year of issuance; environmental status (AMDAL vs UKL-UPL vs SPPL); details of any monitoring report. *Example:* “SPPL No. A/N-12345, issued 2020.”
- **Forest Regulations:** Forest license or concession number (if land was converted from forest zone); official status of plot under forestry law; forest-related impact assessment IDs. *Example:* “IUPHHK-PS/PLH No. 78 (for plantation in ex-forest area).”
- **Third-Party Rights:** FPIC/consent status (Yes/No); date of community consultation; any unresolved land conflict (Yes/No, describe). Fields for number of community permits or agreements. *Example:* “FPIC signed 2019 with Desa ABC; reference document ID.”
- **Labour:** Number of employees (permanent/contractual); existence of worker contracts (Yes/No); BPJS health and employment registration numbers; date of last K3 (safety) audit. *Example:* “BPJS Ketenagakerjaan No. 123456789 (all workers covered) ⁶ .”
- **Human Rights:** Policy adherence (Yes/No); records of complaints/grievances; certification (e.g. SA8000, if any). This may primarily capture “No known violations.”
- **Tax/Anti-Corruption:** NPWP Tax ID; year of last tax return filed; proof of property tax (PBB) payment; presence of anti-bribery policy (Yes/No). *Example:* “NPWP 01.234.567.8-999.000 (active) ⁷ .”
- **Other National Laws:** Any relevant permits (e.g. TLS/izin rencana tanam for plantations, customs registration for exporters, business license/SIUP).

Across sections, date fields should use date pickers, numeric fields (NPWP, BPJS) should only allow digits, and enumerations should use dropdowns or radio buttons. Field hints clarify format (e.g. NPWP has 15 digits). All fields flagged as “required” for the given supplier type must be completed before submission.

Upload Capabilities

Each section includes a PDF upload control for supporting documentation. Requirements:

- **File Type:** Only PDF is accepted (restrict via file selector and validate MIME type server-side).
- **Multiplicity:** Allow multiple files per section if needed (e.g. multiple permits). Each uploaded PDF is listed with a remove option.
- **Size Limits:** Enforce a reasonable max (e.g. 10 MB per file) to prevent excessively large uploads.
- **Naming:** Display the file name after upload; optionally allow the auditor to enter a brief description.
- **Validation:** On upload attempt, show error if file is not PDF or exceeds size. The system should ensure content is scanned (e.g. virus check) and stored securely.
- **Mapping:** Each uploaded PDF is tagged to its indicator so that, for instance, an SPPL PDF is clearly associated with Environmental Laws.

This ensures all evidence is collected and linked to the correct legal category. The UI should display clear upload prompts (e.g. "Upload Land Title Deed (PDF)") and show a preview or file link after upload.

Logic & Validation

The form employs business rules so that auditors only see relevant fields and cannot submit invalid data:

- **Conditional Fields:**
 - *Smallholder Area:* If "Supplier Type = Smallholder" and "Plantation Area < 25 ha," then the SPPL upload field under Environmental Laws becomes mandatory (since SPPL applies instead of AMDAL) ⁴ . If area ≥ 25 ha, show AMDAL fields instead.
 - *Customary Land:* If the "Communal/Customary Rights" flag is set to Yes, then the FPIC upload field under Third-Party Rights is required (FPIC documentation must be provided) ⁵ .
 - *Informal Supplier:* If the supplier is marked as informal/independent (no formal registration), then the NPWP field may be marked optional or "N/A." Formal corporations must fill NPWP and attach tax docs ⁷ .
 - *Labour Presence:* If "Number of Employees" > 0, then require BPJS registration fields under Labour (since at least one worker must be registered) ⁶ . If zero, these can be skipped.
- **Mandatory vs Optional:** The form flags required fields based on the above rules. For example, KCPs and estates must provide NPWP and BPJS (as they are formal businesses) ⁷ ⁶ , whereas smallholders may skip NPWP. Similarly, large plantations must have AMDAL numbers.
- **Field Validation:** Numeric fields (e.g. area, BPJS, NPWP) allow only digits; NPWP is validated as 15 digits; dates use a calendar picker and must be valid; text fields have character limits. Each required field must be non-empty before submission.
- **User Interface Flow:** Use dynamic show/hide to present fields only when relevant (e.g. only show the FPIC section if community land is indicated). Collapsible sections can keep the form manageable. Validation messages (in red) appear next to fields if the auditor attempts to proceed without filling a mandatory field or if the input format is wrong.

By enforcing these rules, the form guides auditors through the logic of each supplier scenario and prevents incomplete submissions. For instance, the system prompts: "Please upload SPPL document (mandatory)" when a smallholder's area is entered as 10 ha, reflecting Indonesian law ⁴ .

User Workflow

1. **Login & Task Assignment:** An auditor logs in and sees a dashboard of pending assessments. A supervisor or system assigns suppliers/assessments to auditors (or auditors can select a new supplier entry themselves). The system tracks which auditor is responsible.
2. **Create/Select Supplier:** The auditor either creates a new record or opens an existing one for the chosen supplier. The form displays the Supplier Info section first (type, name, region). Upon saving supplier identity, the rest of the form is unlocked.
3. **Data Entry & Saving:** The auditor works through each section in order, filling fields and uploading PDFs. Progress is saved automatically (or via a "Save Draft" button), so the auditor can exit and resume later without losing data. The form's status (e.g. "In Progress") is visible.
4. **Submission for Review:** Once all mandatory fields are complete, the auditor submits the form. The system checks all validation rules one final time. If any required document is missing, an alert is shown.
5. **Supervisor Review:** After submission, a reviewer can log in to review the entries and attached files. They can add comments or request clarification if needed. Only after final approval is the record marked "Complete."
6. **Export/Due-Diligence Reporting:** Finally, the form data can be exported for EUDR reporting. The system compiles the responses into a due-diligence statement format, including operator details, product description, land geolocations and confirmation of legal compliance ⁸. It may export a CSV/JSON for integration with the EU's information system or generate a PDF report. The export includes links or filenames of all uploaded PDFs so auditors can produce a full audit dossier. This ensures the company can submit the required EUDR due-diligence statement (Article 33) with complete supporting evidence ³ ⁸.

Key workflow features: auto-save, status tracking (Draft/In Review/Completed), user roles (auditor vs reviewer), and one-click export. The interface should guide users logically from start to finish, highlighting missing items and preventing final submission until all critical data is entered.

¹ Navigating EUDR Compliance: A Case Study in First-Mile Precision | Treefera

<https://www.treefera.com/blog/navigating-eudr-compliance-first-mile-precision>

² ³ ⁸ efi.int

https://efi.int/sites/default/files/files/flegtredd/Terpercaya/Other%20resources/ISPO_Joint_Gap_Assessment.pdf

⁴ efi.int

https://efi.int/sites/default/files/files/flegtredd/KAMI/Resources/Smallholder_challenges.pdf

⁵ ⁶ ⁷ madaniberkelanjutan.id

<https://madaniberkelanjutan.id/wp-content/uploads/2024/03/MADANI-Update-EUDR-1.pdf>