



Seafood connection

EUDR risk assesment

AS PRESCRIBED BY EU/2023/1115 ARTICLE 9

	RISK ASSESSMENT INPUTS FROM EU/2023/1115 ARTICLE 9	RESULT (CN)	RISK MITIGATION (CN)	SOURCE
A	Assignment of risk to the relevant country in accordance with EU/2023/1115 Article 29	Standard risk	Due Diligence self-assessment done by supplier	EU/2023/1115
B	Presence of forests in the country of production	Forests are present in China in 2020, according to the EU observatory on deforestation and forest degradation	Each singular plot/field where our edamame is farmed is checked against the Global Forest Watch database, to check if there has been any deforestation and/or land-conversion present.	Global Forest Monitoring
C	Presence of indigenous peoples in the country of production	<p>The Chinese government recognizes 55 peoples of ethnic minorities and adopted the United Nations Declaration on the Rights of Indigenous Peoples, it does not recognize the term Indigenous Peoples, so the Declaration is not implemented in China. Human rights defenders emphasize increasing tension and widening the cracks in the relationship between the Han Chinese majority and ethnic minority peoples. Autonomous ethnic regions account for approximately 60% of China's total area. According to the latest government data from the 2010 national census, the population of ethnic minorities stands at 111,964,901 people or 8.4% of the country's total population. There are still ethnic groups not recognized in China, totalling 640,101 people. The language and education policy focus on raising the literacy rate of Putonghua (standard Chinese) in rural communities and ethnic minority regions, all courses and textbooks in Uighur and Kazakh will be banned.</p> <p>Although in some ethnic minority regions the livelihoods of people have improved thanks to the government's economic stimulus programs, ethnic minority peoples are still subjected to oppression and discriminatory policies, and in Xinjiang Uyghur, Tibet continues Political unrest and cultural conflicts. Autonomous ethnic regions of Inner Mongolia. Another struggle for the Indigenous Peoples of China is related to the restrictions of their movements. In addition, the conflict over the expropriation of land and the forced relocation of inhabitants continues to be a challenge for many Indigenous Peoples in the Autonomous Region of Inner Mongolia.</p>	N/A	IWGIA
D	Consultation and cooperation with indigenous peoples	Farms and production facilities are operated by ethnic Han Chinese people.	N/A	Internal documentation
E	Existence of duly reasoned claims by indigenous peoples based on objective and verifiable information	No information or indication regarding duly reasoned claims by indigenous peoples that are in conflict with edamame farming at the current farming locations of our suppliers.	N/A	EU/2023/1115



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F	Prevalence of deforestation or forest degradation in the country of production	From 2002 to 2023, China lost 80.7 kha of humid primary forest, making up 0.68% of its total tree cover loss in the same time period. Total area of humid primary forest in China decreased by 4.7% in this time period. China has gained 6.69 Mha tree cover, equal to 5.1% of the global total, which makes it number 5 ranked compared to other countries. Therefore is concluded that prevalence of deforestation or forest degradation in the country of production is standard risk.	Each singular plot/field where our edamame is farmed is checked against the Global Forest Watch database, to check if there has been any deforestation and/or land-conversion present.	Global Forest Watch
G	Source, reliability, validity and links to the information collected as per EU/2023/1115 Article 9	As much as possible, information provided by third party, independent organisations is collected to support conclusions. All sources are described.	N/A	N/A
H1	Governance concerns, such as: level of corruption and prevalence of document and date falsification	China scores 42/100 in 2023 on the Corruption Perceptions Index, where different manifestations of public sector corruption are measured, such as: bribery, diversion of public funds, officials using their public office for private gain, government ability of containing corruption, excessive bureaucracy increasing corruption opportunities, nepotism, conflict of interest-financial disclosures, legal protection of whistleblowers, open access to government information	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap in which governance control points are checked. Know your supplier checks are being done.	Corruption Perceptions Index
H2	Lack of law enforcement	China scores 0,47/1 in 2023 on the WJP Rule of Law Index, and ranks 97/142 worldwide. Different factors contribute to the score, such as: criminal justice, civil justice, regulatory enforcement, order and security, fundamental rights, open government, absence of corruption and constraints on government powers.	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap in which governance control points are checked. Know your supplier checks are being done.	Rule of Law Index
H3	Violations of international human rights	China scores 0,17/1 in 2023 on the Human Rights Index by Our World in Data, based on the V-Dem Civil Liberties Index. V-Dem characterizes civil liberties as three types of freedoms, which contribute to the score: physical integrity rights, private civil liberties, and political civil liberties. Factors that contribute to these sub-scores are: freedom and protection from government torture and political killings, freedom of labor/movement/religion/association/expression, property rights and press freedom.	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap in which governance control points are checked. Know your supplier checks are being done.	Human Rights Index
H4	Armed conflict	China scores 66/163 on the ACLED conflict index, category Low/Inactive. Factors contributing to this score, are: deadliness, danger, diffusion and fragmentation.	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap in which governance control points are checked. Know your supplier checks are being done.	ACLED Conflict Index



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RISK ASSESSMENT INPUTS FROM EU/2023/1115 ARTICLE 9		RESULT (CN)	RISK MITIGATION (CN)	SOURCE
H5	Presence of sanctions imposed by the UN Security Council on the country of production	China is not subject to UN sanctions.	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap in which governance control points are checked. Know your supplier checks are being done.	UN Country Sanction List
H6	Presence of sanctions imposed by the UN Security Council on the country of production	Presence of sanctions imposed by the Council of the EU on the country of production	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap in which governance control points are checked. Know your supplier checks are being done.	EU Sanctions Map
I	Complexity of the relevant supply chain	Low supply chain complexity, suppliers are operator of farms and processors and checks on traceability are done when shipping. This is checked by purchase managers on location.	N/A	Internal documentation
J	Risk of circumvention of this Regulation or mixing of product	Risk of circumvention is low, as each shipment is checked on correctness and information is shared with the EU government with a due diligence declaration. Risk of mixing of product is low, as purchase team physically checks production on location.	N/A	Internal documentation
K	Conclusions of Commission expert groups, published in the Commission's expert group register	Conclusions of Commission expert group, as published in the Commission's expert group register, as per June 5th 2024, are not yet published. Therefore standard risk is applied.	N/A	N/A
L	Substantiated concerns submitted under EU/2023/1115 Article 31, and history of non-compliance of operators/traders	As per June 5th 2024 no substantiated concerns submitted under EU/2023/1115 Article 31, and/or history of non-compliance of operators/traders, known and/or published.	N/A	N/A
M	Any information that point to a risk that relevant products are non-compliant	No other information known that points to a relevant risk.	N/A	N/A
N	Complementary information that might be supplied by certification to third-party verified schemes	Some suppliers Global G.A.P. certified, which assures that no deforestation and land conversion with a cut-off date of the 1st of January 2014.	Processors are certified and audited by third-party schemes, such as GFSI/BRC/BSCI/Global Gap	Internal documentation

RISK SCORE

LOW RISK

MEDIUM RISK

HIGH RISK



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Date: 20-02-2025

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	RISK SCORE	SEVERITY SCORE	RISK*SEVERITY	RESIDUAL RISK
A	0,66	1,0	0,66	0,0
B	1,0	0,0	0,0	0,0
C	1,0	0,0	0,0	0,0
D	0,0	1,0	0,0	0,0
E	0,0	1,0	0,0	0,0
F	1,0	1,0	1,0	0,0
G	0,0	1,0	0,0	0,0
H1	0,42	1,0		
H2	0,47	1,0		
H3	0,17	1,0		
H4	0,0	1,0		
H5	0,0	1,0		
H6	0,0	1,0		
H TOTAL	0,18	1,0	0,18	0,0
I	0,0	0,5	0,0	0,0
J	0,0	1,0	0,0	0,0
K	0,0	1,0	0,0	0,0
L	0,0	1,0	0,0	0,0
M	0,0	0,0	0,0	0,0
N	0,0	1,0	0,0	0,0