



Traceability Framework  
for natural rubber from  
smallholder plantations  
Mills



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# 1. Introduction

## Presentation of the Standard

This natural rubber traceability framework for primary processing plants ("the framework") describes the requirements for primary processing plants to implement a robust system for identifying and tracking the origin of raw material (rubber cup lumps) from plantations managed by smallholders.

In particular, this framework makes it possible to set up the traceability elements necessary to meet the requirements of the European Union's Deforestation Regulation for the producer-to-mill segment. From 2025, these requirements will apply to organizations placing natural rubber in all its forms on the EU market, as well as products processed from natural rubber (including tyres). In particular, the framework makes available reliable information on the geolocation of production plots and the period of rubber production.

More specifically, the framework requires Organizations to:

1. Define corporate traceability policy and procedures
2. Implement a quality management system relating to the traceability system
3. Implement appropriate digital tools
4. Record smallholders
5. Register entities in supply chains including intermediaries
6. Register and map smallholder plantations
7. Set up a management system for raw material purchases and deliveries
8. Set up an industrial batch traceability system
9. Communicate traceability information to their own buyers
10. Control the quality of traceability data collected

## Methodology

This framework has been developed jointly by Preferred by Nature, SIPH through its subsidiary SAPH, and SOCFIN through its subsidiary SOGB, based on the traceability commitments and systems currently being developed by millers.

## Scope of the Framework

This framework can be applied by any manufacturer sourcing natural rubber cup lumps and carrying out initial processing of the raw material.

## Application of the Framework

This framework is freely available to all stakeholders in the industry. It is flexible in its use, and can be used as a guide for setting up or improving a traceability system, as a self-assessment grid for a traceability system set up by the millers themselves, or as a framework verified by third-party audits.

## Definitions

**Commitment:** A public statement by the Organisation that specifies the actions that it intends to take, or the goals, criteria, or targets that it intends to meet with regard to its management of, or performance on environmental, social, and/or governance topics.<sup>1</sup>

**Constitution batch:** Set of raw materials (cup lumps) from a set time period and location, feeding the primary processing plant's processing line(s).

**Geolocation:** A set of techniques for determining the location of an object or individual based on geographic coordinates.

**Intermediary buyer:** Economic agent located between the smallholder farmers and the primary rubber processing plant.

<sup>1</sup> Source: Accountability Framework Terms and Definitions (version 1.0, March 2020), <https://accountability-framework.org/>

**Interoperability:** Ability of different hardware, software or protocols to work together and share information.

**Records:** Written and stored information. Records may mean copies of documents, or information stored digitally, that can be used to show compliance with the framework indicators.

**Smallholder:** Individual owning and operating a rubber plantation. Also known as a farmer or planter. The plantation type may also be referred to as a village plantation.

**Supplier:** The entity that supplies raw materials, processed materials, or finished products to a buyer. The supplier may either be a direct supplier (selling directly to the buyer) or an indirect supplier (selling to an intermediary that is one or more steps removed from the buyer).<sup>2</sup>

**Supply chain:** The route of products and entities that take legal ownership of the products from the source area – where the material is harvested or produced – to the relevant Organisation.

**Traceability:** The ability to follow a product or its components through stages of the supply chain (e.g., production, processing, manufacturing, and distribution).<sup>3</sup>

**Upstream:** In relation to the reference organization, position in the supply chain closer to the raw material harvesting stage and earlier in the material and product processing stages.

#### Acronyms

**ISO:** International Standard Organisation

**FSC:** Forest Stewardship Council

#### Verbal forms for the expression of provisions

“shall” (as well as verbs conjugated in the present): indicates requirements strictly to be followed in order to conform to the framework.

“should”: indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required.

“may”: indicates a course of action permissible but not mandatory.

“can”: is used to statements of possibility and capability, whether material, physical or casual.

#### Version history

V1-0 - Finalized on July 1<sup>st</sup>, 2023, by Preferred by Nature, on contract with SOCFIN and SIPH to develop the Traceability Framework.

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<sup>2</sup> Ibid.

<sup>3</sup> Source: Accountability Framework Terms and Definitions (version 1.0, March 2020), <https://accountability-framework.org/>.

## 2. Indicators

### 1. Corporate traceability policy and procedures

Indicators	Guidance
<p>1.1. The organization has clear, documented and public traceability commitments.</p>	<p><i>These may be elements of language included in a company policy, organizational procedures or other written documents.</i></p> <p><i>Commitments should be clearly formulated, avoiding any ambiguity.</i></p> <p><i>If commitments are targets, they should be measurable and time limited.</i></p>
<p>1.2. The organization's management and senior executives are aware of and approve traceability commitments.</p>	<p><i>Traceability commitments may have been developed/approved at a higher level (e.g. holding company, head office) or at a subsidiary level (e.g. sustainable development and/or procurement teams). It is therefore important to ensure the commitment of the management and executives of the organization implementing the framework.</i></p> <p><i>Management approval should be documented.</i></p>
<p>1.3. Commitments to traceability include the implementation of traceability from smallholder rubber plantations to finished products sold.</p>	<p><i>The organization's commitments to traceability explicitly state that the system in place aims to link the raw material (natural rubber cup lumps) from individual farms to the processed products sold by the organization.</i></p>
<p>1.4. Suppliers upstream of the supply chain are aware of the organisation's traceability commitments.</p>	<p><i>Traceability commitments should be publicly available. In all cases, they shall have been communicated to intermediaries and producers affected by requests for traceability information.</i></p> <p><i>Traceability commitments can be shared upstream in several ways, through written documents such as elements added to purchase contracts, charters/codes of good conduct or other documents made known to suppliers, or through meetings or training sessions.</i></p> <p><i>It is advisable to record evidence of this information sharing.</i></p>
<p>1.5. Detailed procedures describing the steps involved in implementing commitments and the associated traceability system are developed and documented.</p>	<p><i>These elements can be the subject of standard operating procedures (SOPs) or be integrated into pre-existing procedures, such as those relating to information management (collection, treatment, storage), to procurement, to the handling and sale of materials, as well as to supplier management.</i></p>

## 2. Quality management

Indicators	Guidance
2.1. Staff in charge of implementing and monitoring traceability procedures are clearly identified and trained.	<i>Personnel involved in implementing the traceability system shall be aware of their responsibilities and adequately trained to carry them out.</i>
2.2. Responsibilities for the traceability system are clearly defined and monitored.	<i>Responsibilities for implementing the traceability system should be clearly linked to specific workstations and tasks (implementation, responsibility, follow-up, etc.).</i>
2.3. Resources necessary to implement traceability commitments are identified and available.	<i>The necessary material resources (equipment, funds, etc.) and personnel shall be deployed to ensure proper implementation of the traceability system.  In particular, the personnel concerned shall have sufficient access to the digital tools deployed to collect and process traceability data.</i>
2.4. The traceability system is subject to regular internal review.	<i>The organization shall regularly carry out its own self-assessment of the traceability system in place, in order to identify any shortcomings or weaknesses preventing it from achieving its commitments.</i>
2.5. If future traceability targets have been set, the level of implementation is regularly assessed.	<i>The achievement of measurable objectives at given dates should be monitored periodically.</i>

## 3. Implementation of appropriate digital tools

Indicators	Guidance
3.1. Appropriate digital tools are identified and deployed to collect, store and manage traceability information.	<i>The digital tools deployed may concern a single software solution or a set of software solutions. This also covers hardware for data collection (keyboard, GPS, scanner, etc.).</i>
3.2. Traceability information is stored in appropriate, interdependent digital records.	<i>As traceability information is likely to represent a large volume of data linked together in a complex way, it should be stored in an appropriate structure.  The use of a database is recommended.</i>
3.3. Paper documents and records used at various stages of purchasing and processing are fully or partially transcribed into a digital format in the appropriate records.	<i>If the organization uses paper forms or documents, the key information shall be transcribed into the digital records. Data entry operators should follow a clearly defined procedure.</i>
3.4. The digital records used include automatic collection and/or entry of structured data and/or mandatory fields whenever necessary and possible.	<i>The digital records used should endeavour to avoid manual input errors that would render subsequent data processing inaccurate.  The filling of data fields should, where possible, use one or more of the following mechanisms:</i> <ul style="list-style-type: none"> <li>- <i>Automatic data entry: for example, the quantity of raw material delivered is automatically entered when a truck is weighed.</i></li> <li>- <i>Structured data entry: all possible data are predefined in lists. They can be presented to the</i></li> </ul>

Indicators	Guidance
	<p><i>data entry operator in the form of a drop-down list.</i></p> <ul style="list-style-type: none"> <li>- <i>Mandatory fields: the software solution used does not allow the operator to leave a field blank.</i></li> </ul>
<p>3.5. The digital tools deployed guarantee the centralization of traceability data. If traceability-related information is entered and/or stored in several different software programs, these software programs are connected and interoperable accordingly.</p>	<p><i>Only one updated version of collected data shall exist.</i></p>
<p>3.6. The software deployed minimizes the number of operations required to enter and use traceability data, including insertions or extractions from one software package to another.</p>	<p><i>The risk of data corruption caused by manual data manipulation, such as manual extraction or insertion operations between software programs, should be minimized. The efficiency of the traceability system would also be adversely affected by too much manual manipulation.</i></p>
<p>3.7. The organization controls the software enhancements and configuration required to deploy and improve its traceability system.</p>	<p><i>The organization needs to ensure that it has full control over the IT updates and enhancements required for the traceability system to function properly.</i></p> <p><i>This applies to software solutions developed in-house or externally.</i></p>
<p>3.8. The IT tools deployed retain data on entries or modifications to traceability information.</p>	<p><i>It shall be possible to trace and determine which operator entered or modified the data contained in the records, and when these operations were carried out.</i></p>
<p>3.9. The traceability information contained in the digital records and paper documents used is kept for a sufficient minimum period.</p>	<p><i>The commonly recommended practice is to keep traceability records for a minimum of 5 years.</i></p>
<p>3.10. Records containing traceability information are stored securely.</p>	<p><i>The organization ensures that the risk of loss or corruption of traceability records is minimized, in particular by means of appropriate backups.</i></p>
<p>3.11. The digital tools used have the functions and power required to process and analyse traceability-related information.</p>	<p><i>The organization ensures that digital tools are available to process and analyse recorded data. Appropriate software functionalities are put in place, as well as hardware infrastructure (e.g. adequate processors).</i></p>

## 4. Registration of smallholders

Indicators	Guidance
<p>4.1. A procedure for registering smallholders is documented, known to the concerned parties and implemented.</p>	<p><i>The traceability system implemented shall include the identification and registration of all smallholders supplying raw material (natural rubber cup lumps) to the mill. The steps involved in registering smallholders are defined and managed by procedures.</i></p>
<p>4.2. Digital records are set up to identify smallholders. Smallholders are assigned a unique registration number.</p>	<p><i>Smallholders are registered in specific and appropriate records.</i></p> <p><i>Each identified and registered smallholder shall have a unique identification number.</i></p>

Indicators	Guidance
	<i>Unique identification numbers can be allocated to other records, in particular the plantation register. Each plantation operated by the same smallholder will have its own identification number (see indicator 6.4).</i>
4.3. The information to be collected in relation to smallholders is clearly defined by the organisation.	<i>The information associated with smallholders to be included in the organization's records is clearly defined. It is advisable to define which information is compulsory and which is optional.</i>
4.4. Declarations provided by smallholders are supported by verifications and/or documentary evidence.	<i>This may involve, for example, verification of identity documents or on-site visits to declared plots of land.</i>
4.5. A procedure for identifying and managing potential duplicates is developed and implemented.	<i>The system set up shall include checks to ensure that the same smallholder is not linked to multiple records.</i>

## 5. Registration of supply chain entities with one or more intermediate buyers

Indicators	Guidance
5.1. The use of supply chains including one or more intermediary buyers between the smallholders and the primary processing mill shall only be employed where there is a demonstrated added value.	<p><i>Whenever possible, purchasing raw materials directly from growers is preferred, in part to ensure the reliability of the traceability information.</i></p> <p><i>However, it is possible to use intermediary buyers when this offers a demonstrated advantage, for example in terms of the logistics involved in transporting the raw material, the quantity of deliveries, the integration of growers into cooperative networks that also provide access to training or agricultural credit, etc.</i></p>
5.2. A procedure for recording supply chains that include one or more intermediate buyers is documented, known to the concerned parties and implemented.	<p><i>Where relevant, the traceability system implemented should include the identification and registration of supply chains involving intermediaries. The identification of a supply chain includes the intermediary or intermediaries, as well as all the smallholders supplying them with the raw material.</i></p> <p><i>The steps involved in registering supply chains including intermediaries are defined and managed by procedures.</i></p>
5.3. The procedures implemented enable the identification and registration of smallholders supplying raw materials (cup lumps) to intermediate buyers.	<i>The traceability system implemented shall include the identification and registration of all intermediary buyers supplying the raw material (natural rubber cup lumps) to the mill.</i>
5.4. Digital records are set up for the unique identification of intermediaries.	<i>Intermediate buyers are recorded in specific and appropriate registers.</i>
5.5. Intermediaries are assigned a unique registration number.	<i>Each identified and registered buyer has a unique identification number.</i>
5.6. Digital records shall establish links between smallholders and intermediaries.	<i>Digital records make it possible to link the records of intermediary buyers with the records of all smallholders supplying them with raw materials.</i>

Indicators	Guidance
5.7. Appropriate checks on identification of smallholders linked to intermediaries are implemented.	<i>This may involve, for example, checking identity documents for individuals, business-related administrative documents for legal entities, or visits to related plantations.</i>

## 6. Registration and mapping of smallholders' plantations

Indicators	Guidance
6.1. Smallholders' rubber plantations are geolocated by recording their boundaries (polygons based on geographic coordinates).	<p><i>The traceability system implemented shall include the geolocation of all smallholders' rubber plantations.</i></p> <p><i>The geolocation of an area is achieved by collecting a sufficient number of points (GPS coordinates comprising a latitude and a longitude, enabling a single point on the earth's surface to be identified).</i></p>
6.2. A procedure for mapping smallholders' plantations is documented, known to the concerned parties and implemented.	<i>The steps involved in geolocating rubber plantations are defined and managed by procedures.</i>
6.3. The geolocation data for smallholders' plantation polygons are checked and processed as appropriate when they are logged in the dedicated registers.	<i>For example, the transfer of geolocation data from a dedicated device (GPS, smartphone...) to the digital records deployed is accompanied by boundary processing and verification (polygons are closed by points being properly linked, there is no abnormal coordinates, etc.).</i>
6.4. Smallholders' plantations are assigned a unique registration number.	<p><i>Each rubber plantation identified and registered has a unique identification number.</i></p> <p><i>However, it is also necessary to allocate unique identification numbers to other records, such as the smallholders' records (see indicator 4.3).</i></p>
6.5. The organization has developed and implements a clear definition of what constitutes a smallholder's plantation.	<i>For the purposes of geolocation of rubber plantations, a definition of what constitutes a plantation is clearly specified, in particular to manage cases where a smallholder farms other agricultural commodities on their plantation, or has several non-contiguous plots, which may or may not be located in the same municipality, etc.</i>
6.6. The information to be collected in connection with smallholder plantations is clearly defined by the organization.	<p><i>The information associated with the plantations to be included in the organization's records is clearly defined. This may include, for example, municipalities, identification of non-mature planted areas, identification of the type of clone planted, and so on.</i></p> <p><i>It is advisable to define what information is compulsory, and what information is optional.</i></p>
6.7. A unique and appropriate format is defined for storing geolocation information.	<i>As there are many reference coordinate systems (e.g. UTM, WGS, Lambert, etc.) as well as file formats (e.g. GPX, CSV, KML, SHP, GeoJSON, etc.) that can contain geolocation data, it is important to define a single format that is permitted and integrated into the traceability system.</i>

Indicators	Guidance
6.8. Geolocation data is stored in digital tools in a clear and practical manner. They are clearly associated with the corresponding plantation records.	<i>It is important that each plantation is linked to the corresponding geolocation data. It is desirable to be able to easily visualize on a map the plantation records registered in the traceability system.</i>
6.9. Plantation records are clearly associated with the records of the relevant smallholders.	<i>Digital records can be used to link plantation records with the relevant smallholder records.</i>

## 7. Management of raw material purchases and deliveries

Indicators	Guidance
7.1. Every purchase/delivery of rubber from smallholder plantations recorded in the system is linked to one or several smallholder records in the digital tools deployed.	<i>Each recorded purchase/delivery shall be linked to at least one individual smallholder.</i>
7.2. For purchases/deliveries involving several smallholders (farmers grouping together or delivering via an intermediary), volumes are declared and recorded for each smallholder.	<i>When a delivery includes natural rubber cup lumps produced by several smallholders, the system requires and enables recording the precise volume supplied by each smallholder.</i>
7.3. Any purchase/delivery of rubber from smallholder plantations recorded in the system is associated with a rubber harvesting period.	<i>Each registered purchase/delivery shall be linked to a time-limited rubber harvesting period also recorded in the digital tools deployed.</i>
7.4. Other information to be collected in connection with raw material purchases/deliveries (natural rubber cup lumps) is clearly defined by the organization.	<i>The information associated with purchases/deliveries to be included in the organization's records and not covered by indicators 7.1 to 7.3 is clearly defined. This may include, for example, quantities, delivery dates, vehicle identification, etc.  It is advisable to define which information is compulsory, and which is optional.</i>
7.5. Storage areas are clearly defined, numbered and physically separated from each other.	<i>Within the mill, storage areas for natural rubber cup lumps shall be confined to a delimited area.</i>
7.6. Storage areas are associated with constitution batches which are within a set timeframe - batch opening and closing dates are recorded.	<i>The filling of a storage area takes place over a delimited period of time.</i>
7.7. Each delivery is unloaded in a specific storage area, and is associated with a unique constitution batch identified by its number.	<i>The system requires and makes it possible to record in which storage area and for which constitution batch the deliveries of natural rubber cup lumps are unloaded as they enter the mill.</i>
7.8. The records used make it possible to link a constitution batch to a storage area and to a list of smallholders who have delivered the corresponding raw material.	<i>The traceability system shall enable linking constitution batches to a precise list of smallholders who have contributed to the production of natural rubber.</i>
7.9. If the raw material is transferred from one storage area to another before arriving at the mill, the recorded information can be used to track constitution batches and link smallholders up to storage areas at the mill.	<i>This may involve delivery and storage areas outside the mill, such as the filling of containers at a weighbridge, which are transported to the mill once filled.  The system shall make it possible to link the mill's constitution batches back to a precise list of intermediate batches, and then to a precise list of</i>

Indicators	Guidance
	<i>smallholders who have contributed to the production of natural rubber for these intermediate batches.</i>

## 8. Internal batch traceability

Indicators	Guidance
8.1. An internal industrial batch traceability procedure is documented, known by the relevant employees and implemented.	<p><i>The traceability system implemented shall include product traceability between the of raw material reception steps at the mill and up to the product delivery steps.</i></p> <p><i>This procedure can be based on and meet the requirements of third-party certification systems that include elements of industrial traceability (ISO 9001, FSC chain of custody, etc.).</i></p>
8.2. Unique identification numbers are applied to all product batches at each stage of the industrial process.	<i>Industrial traceability of products during the various steps of storage and processing is based on a system of allocation of unique identification numbers to each batch.</i>
8.3. Unique batch identification numbers are recorded in the digital tools deployed and are systematically linked to the identification numbers of the preceding and following steps.	<i>The system tracks the physical match between batches at different stages of the industrial production process.</i>
8.4. The records used enable end products to be easily matched against one or more precise constitution batches at the mill storage level.	<p><i>The system makes it possible to link a batch of final products with one or more batches of raw material (natural rubber cup lumps).</i></p> <p><i>It is desirable that this operation be easily or even automatically performed.</i></p>
8.5. If necessary, the system in place enables products to be segregated according to the characteristics of the raw materials, and in particular to separate batches consisting of raw materials that do not meet upstream traceability requirements up to the level of the rubber plantation.	<i>The industrial traceability system ensures that any raw material deliveries not linked to a reliable list of smallholder plantations are treated separately and not mixed with compliant batches.</i>

## 9. Downstream traceability

Indicators	Guidance
9.1. In relation to outgoing products, the digital tools deployed enable the aggregation of relevant information relating to smallholders including the geolocation of their plantations and rubber harvesting periods. They enable this extraction to be carried out easily or even automatically.	<i>The traceability system implemented shall make it possible to link any outgoing product with a precise list of smallholders and plantations that have contributed to supplying the raw material included in said product.  This operation should be straightforward or even automated.</i>
9.2. If requested, traceability information is shared with buyers, and this is documented.	<i>The traceability system enables traceability information to be shared with buyers and keeps track of the data being communicated.</i>
9.3. Traceability information is provided to purchasers in an appropriate format.	<i>Traceability information can appear on invoices, packing lists, sales contracts and so on. It can also be communicated digitally between the organization's software solutions and those of buyers (for example, via APIs - application programming interfaces).</i>

## 10. Control and verification of traceability data

Indicators	Guidance
10.1. An automated process has been set up to identify risks on the basis of the information collected.	<i>The software solutions implemented can, for example, flag up undesirable elements, inconsistent data, missing data, etc.</i>
10.2. Measures are implemented and documented to verify the integrity of data provided by suppliers up the supply chain.	<i>Data integrity includes data accuracy, completeness and consistency. It can be measured by field verification, testing, third-party audits, etc.</i>
10.3. A quota system relating to the maximum yield of registered smallholder plantations is defined in order to limit the risks of wrongful identification of rubber origin.	<i>The digital system deployed shall make it possible to identify cases where a smallholder declares that they are delivering a quantity of raw material that the production area registered in their name would not normally allow them to produce, according to established agronomic knowledge.</i>
10.4. Quotas are defined by the organization in a justified manner and on the basis of relevant production areas.	<i>It is up to the organization itself to define the quotas used for the alert system on quantities delivered that do not correspond to the recorded areas. However, these quotas shall be justified. The procedure for determining and approving quotas should be transcribed and recorded.</i>
10.5. A system for alerting and/or checking the delivery volumes of smallholders on the basis of defined quotas is developed and implemented.	<i>The system in place enables either ongoing automated computer alerts, or periodic verification of volumes delivered, or both.</i>
10.6. The organization has identified the limitations of the quota verification approach. Other measures to mitigate the risks associated with inaccurate traceability are identified and implemented to control steps where mixing with unidentified sources could occur.	<i>The quota-based verification approach does not necessarily control all risks of mixing with unidentified sources, e.g. if the same plantation is registered twice, or if the same smallholders supplies several other mills, etc.</i>

Indicators	Guidance
	<p><i>Other risk mitigation measures need to be planned, particularly at the highest risk steps. These could include periodic field inspections. Efforts to mitigate the risk of inaccurate traceability should be documented and monitored.</i></p>
<p>10.7. Internal procedures exist for identifying and dealing with non-compliant suppliers or materials. These procedures are effectively implemented, and cases of application are recorded.</p>	<p><i>Non-compliant products may be those for which traceability data is missing or inaccurate (unjustified quota overruns, results of field checks, etc.).</i></p> <p><i>In particular, the traceability system shall specify the steps to be taken when identifying suppliers or deliveries that do not comply with traceability requirements. These steps include both the immediate treatment of the situation and associated products, as well as the identification of root causes to prevent recurrence of the problem.</i></p> <p><i>It is desirable for the traceability system to keep a history of non-conformities observed and actions taken.</i></p>

## Annex 1. Overview of the traceability framework for natural rubber from smallholder plantations for use by millers

Existing traceability practices for forestry and agricultural raw materials, including natural rubber, are particularly diverse, with differing objectives and levels of ambition.

In addition to ambitious, robust commitments that meet one or more clear sustainability goals, it is necessary to rely on tools that provide a more detailed description of the systems deployed.

Accordingly, this framework aims to formalise commitments made in the natural rubber sector regarding traceability, by describing the practices that should be associated with the implementation of robust traceability systems.

It aims to set out the best practices to be followed by natural rubber mills sourcing from smallholders.<sup>4</sup> These practices are detailed in a series of clear indicators grouped into a range of 10 thematic sections.

### Traceability objectives covered by the framework



The implementation of the framework's indicators allows:

- Total control of the supply base of smallholders: each natural rubber smallholder is identified. The direct commercial relationship between smallholders and the mill is preferred and facilitates compliance. It remains possible for the factory to source from intermediate buyers, in which case all the entities in the supply chain up to the smallholders are identified and recorded.
- Precise geolocation of all rubber plantations: each plantation is mapped and recorded.
- Monitoring of natural rubber volumes and transactions: each delivery of cup lumps to the mill is recorded and linked to one or more smallholders.
- Monitoring of batches of natural rubber at the mill, from reception to packing; this enables precisely linking outgoing packages with a specific list of smallholders and their plantations who have supplied the raw material, including information on corresponding geolocation and harvest periods.

### Sustainability purposes



The framework does not directly cover the way in which information on the traceability of the raw material from smallholder rubber farms will be mobilized.

It nevertheless represents an essential step in the implementation of credible sustainability actions, particularly regarding the avoidance of deforestation practices for the cultivation of rubber, which can only be analysed in detail by precisely identifying the geographical origin of the raw material.

Other challenges of reducing negative social and/or environmental impacts can also be addressed with increased efficiency based on the traceability elements covered by this framework.

In addition, this framework also aims to ensure compliance with the regulations relating to these same sustainability issues, at the forefront of which is the European Union Regulation on Deforestation ("EUDR"). The latter requires rubber production that is (1) legal and (2) has not contributed to deforestation after the defined cut-off date (December 2020). It explicitly requires organizations placing natural rubber and certain products derived from it (including tyres) on the

<sup>4</sup> NB: the traceability of natural rubber from own plantations or other industrial or semi-industrial plantations is not covered by this standard.

European market to ensure these points and to provide, for each import, a precise identification of the natural rubber plantations that have contributed to produce the raw material found in the products concerned. To respond to this, this framework makes reliable information on the geolocation of production plots and the rubber production period available.

Other regulations may also emerge in the near future on related subjects or for other markets. This framework aims to describe a traceability system robust enough to adapt to most regulatory requirements relating to the processing and sale of natural rubber and its derivatives.

## Development and application of the framework

The framework was developed by the organization Preferred by Nature between February and July 2023, in collaboration with SIPH through its subsidiary SAPH and SOCFIN through its subsidiary SOGB.



It is open source, which allows all stakeholders in the natural rubber sector to access and use it.

It is aimed primarily at natural rubber millers, both at the strategic and operational levels. They can use it as a guide to assess their traceability systems in place, identify potential shortcomings and define a traceability action plan. They may also aim for full compliance with all the framework indicators, which may be assessed internally, by partners or by a third-party structure.<sup>5</sup>

This framework is also intended for other players in the sector (for example, tyre manufacturers sourcing natural rubber, vehicle manufacturers, multi-party initiatives, etc.), who can use it to collectively define a traceability strategy for natural rubber with mills, as well as supporting them in the deployment of their traceability system. The reference framework may be useful to monitor and assess their own commitments in terms of sustainability, as well as their regulatory compliance, in particular in connection with the EUDR.

More generally, the entire natural rubber sector may rely on the elements of this framework to support and uphold a high ambition in terms of traceability and alignment of best practices.

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<sup>5</sup> NB: No specific audit procedure has yet been developed in connection with this standard.

## Key elements of the Framework

