



Annex B — Legal & Compliance Context

OriLife Platform: Legal Framework, International Compliance & Intellectual Property

Document: Annex B — Legal & Compliance Context

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1. Overview — Why Legal Context Is OriLife's Advantage

OriLife operates at the intersection of **five legal systems** directly affecting the Dak Lak durian supply chain for global export: Vietnam, China, the European Union, the United States, and Japan.

Core Thesis: OriLife is not a voluntary solution. It is a solution **mandated by at least 4 legal systems simultaneously** — with hard deadlines that cannot be extended. No existing market solution addresses all of these requirements on a unified platform.

Significance for dReps: A YES vote means the Cardano community invests in a project that **the market is required to adopt** — not a startup that can be eliminated by market forces. Legal deadlines create mandatory demand, independent of marketing or voluntary adoption.

2. Vietnamese Legal Framework

2.1 Decision 1236/QĐ-TTg — National Blockchain Strategy

Field	Detail
Number	1236/QĐ-TTg
Source	https://vanban.chinhphu.vn/?pageid=27160&docid=211462
Issuing Authority	Prime Minister of Vietnam
Year	2024
Scope	National blockchain strategy for 2024–2030

Relevant Content: Assigns the Ministry of Agriculture and Environment to research and apply blockchain in plantation management and agricultural traceability. Priority deployment in 2024–2026 for key products and OCOP products.

Significance for OriLife: OriLife is executing a mission assigned by the Vietnamese Government — not experimenting with an idea. This is a critical distinction when evaluating adoption risk.

Significance for Cardano: If OriLife is selected as 1 of 5 national strategic platforms, Cardano becomes the blockchain officially used by a government in agriculture — a first-of-its-kind milestone.



2.2 Resolution 57-NQ/TW — Politburo Directive

Field	Detail
Number	57-NQ/TW
Source	https://xaydungchinhsach.chinhphu.vn/toan-van-nghi-quyet-ve-dot-pha-phat-trien-khoa-hoc-cong-nghe-doi-moi-sang-tao-va-chuyen-doi-so-quoc-gia-119241224180048642.htm
Authority	Politburo — Central Committee
Level	Highest-level strategic document

Relevant Content: AI and Blockchain are identified as national strategic technologies to be mastered. Agriculture tops the priority list for smart production.

Strategic Significance: Resolution 57 creates a political corridor at the highest level. This is not a ministry-level policy that can change with personnel rotation — it is a Politburo directive, stable across multiple terms.

2.3 Decision 5272/QĐ-BNNMT — Durian Traceability Pilot

Field	Detail
Number	5272/QĐ-BNNMT
Source	https://mae.gov.vn/Pages/chitietvanbandh.aspx?ItemID=3451
Issuing Authority	Ministry of Agriculture and Environment
Date Issued	December 13, 2025
Scope	Durian Traceability Pilot
Pilot Period	January 1 – June 30, 2026
Summary Date	July 10, 2026
Expansion	Nationwide by end of 2026

Relevant Content: On April 4, 2026, the first shipment was exported via the Green Lane process — but **still uses physical labels that can be peeled and re-attached**. OriLife solves the weakness that the government's current plan has not yet addressed: biological identification directly on the product, no labels needed.



Significance for OriLife: This is an opportunity to demonstrate value superior to the traditional labeling system during the national pilot. If successful, OriLife will be a strong candidate for the nationwide expansion at end of 2026.

2.4 Summary of Vietnamese Legal Documents

Document	Authority	Relevant Content	Impact on OriLife
Decision 1236/QĐ-TTg (2024)	Prime Minister	Blockchain for plantation & OCOP 2024–2026	OriLife is the implementation vehicle
Resolution 57-NQ/TW	Politburo	AI + Blockchain as strategic tech, Agriculture priority #1	Highest political corridor
Decision 5272/QĐ-BNNMT (2025)	Ministry of Ag & Env	Durian traceability pilot 01/01–30/6/2026, expand end 2026	OriLife solves physical label weakness
Circular 11/2026/TT-BCT	Ministry of Industry & Trade	Mandatory traceability connection from 01/12/2026	Hard legal deadline
Food Safety Law 55/2010	National Assembly	Food traceability responsibility	Legal foundation
Product Quality Law 78/2025/QH15	National Assembly	Product quality standards revision	Legal basis for pilot decisions
Cybersecurity Law 116/2025/QH15 (effective July 1, 2026)	National Assembly	Vietnamese user data stored in Vietnam; foreign service providers must establish local presence	LampNet Sovereign Data Residency — compliant with new law effective during all OriLife deployment phases
Decree 13/2023/NĐ-CP	Government	Personal data protection	PhoenixKey + end-to-end encryption

3. Circular 11/2026/TT-BCT — Deadline December 1, 2026

3.1 Document Information



Field	Detail
Number	11/2026/TT-BCT
Source	https://chinhphu.vn/?pageid=27160&docid=217126&classid=0
Authority	Ministry of Industry and Trade, Vietnam
Date Issued	February 27, 2026
Effective Date	April 16, 2026
Mandatory Deadline	December 1, 2026
Scope	All commercial food production and business establishments

3.2 Directly Relevant Articles

Article 3 — Traceability Code:

The Circular defines a traceability code as "the final identification code at each stage, encoded in a data carrier." OriLife's Bio-ID is precisely that identification code — but the **data carrier is the durian fruit itself** (biological skin texture), not a physical label. This approach complies with the Circular's definition while eliminating the possibility of forgery.

The Circular also requires a "one step forward — one step back" principle: each stage must link to the previous and next stages. VeData ensures this continuity: Tree Registration → Cultivation Log → Fruit Registration → Harvest → Transfer → Processing → Export. Each step has a cryptographic link to the step before and after, impossible to break.

Article 5 — Mandatory Stored Information:

Circular 11 Requirement	OriLife Delivers Via
Name, address, facility code	PhoenixKey DID — decentralized identity
Product name and images	Bio-ID + raw images on LampNet
Identification code, traceability code	Farm NFT + Bio-ID on Cardano Mainnet
Weight, quantity, batch code	FarmDatum batch_sequence + Merkle Tree
Location, event timestamp	GPS coordinates + digitally signed timestamp

Article 6 — Record Retention and Provision:



The Circular requires minimum 12-month retention and record provision within 24 hours. OriLife exceeds requirements: Cardano Mainnet stores immutably **forever** (not 12 months). API Gateway responds in **seconds** (not 24 hours).

Article 14 — Cross-agency Connection:

The Circular requires the system to connect with domestic and international databases. OriLife's Compliance Adapter SDK exports GS1 EPCIS v2.0 and GACC — standards that Vietnam's Ministry of Public Security, Ministry of Health, Ministry of Agriculture, and Chinese Customs can all read natively.

Article 15 — Hard Deadline December 1, 2026:

All food production establishments must connect to the Traceability System from **December 1, 2026**. OriLife's timeline completes M7 (Mass Rollout) by October 2026 — operational for at least **2 months before the deadline**.

3.3 Consequences of Non-Compliance

Violation	Consequence
No connection after 01/12/2026	Product recall ordered
Failure to provide records within 24 hours	Administrative fines + operations suspended
Untruthful traceability data	Criminal prosecution
Export without GACC compliance	Shipment rejected at Chinese port

4. Chinese Standards — GACC

4.1 Overview

The General Administration of Customs of China (GACC) controls all agricultural imports into China. China accounts for **>90% of Vietnam's durian export revenue** (\$3.36 billion USD). Orders 248 & 249 (effective 2022, tightened 2024) govern production facility registration and imported food safety management.



4.2 Requirements and OriLife Response

GACC Requirement	OriLife Delivers Via
Registered plantation code verification	Farm NFT on Cardano
Packing facility code	PhoenixKey DID of the enterprise
Certificate of Origin	Merkle Proof on-chain
Phytosanitary certificate	VeData evidence trail
Residue control (Cadmium, Auramine O)	Immutable cultivation log on LampNet

4.3 Lessons from the 2025 Scandal

The 2025 durian scandal ([source](#)) — 17 individuals prosecuted, 55+ plantation codes revoked, 2,000 containers stuck — is direct evidence that the current traceability system (QR labels, paperwork) has completely failed.

Root Cause: Fraud occurred because the data carrier (label) can be separated from the product. DDC Holdings experienced this firsthand with legacy TonFarm (see Annex A, Section 1). When Bio-ID is the fruit's own skin, there is no way to fake the origin.

4.4 Midnight View Key for GACC

Export enterprises share a View Key with Chinese Customs:

Chinese Customs with View Key	Result
CAN verify	Origin, harvest date, GACC code, phytosanitary
CANNOT see	Contract price, detailed quantities, buyer identity
CANNOT see	Information about other shipments from the same company

This is a real-world business requirement — no existing blockchain solution simultaneously provides customs transparency and commercial confidentiality. Midnight on Cardano is the only primitive that solves this.



5. European Union Standards — EUDR & Food Safety

5.1 EUDR — EU Deforestation Regulation

Field	Detail
Number	EU 2023/1115
Applicable From	Late 2025 (large enterprises), 2026 (SMEs)
Scope	Deforestation-risk commodities: timber, cattle, cocoa, coffee , palm oil, rubber, soy

Why Relevant: Dak Lak is Vietnam's coffee capital. Coffee export revenue \$8.4 billion USD (2024), EU share 46.7%. While the MVP focuses on durian, OriLife SDK can expand to coffee — EUDR creates a massive B2B SaaS market (see M8 in GA).

EUDR Requirement	OriLife Delivers Via
Geographic coordinates (polygon) per plot	GPS boundary in FarmDatum
No deforestation after 31/12/2020	LampNet Sovereign Data Proof + signed timestamp
Verifiable due diligence	Immutable audit trail on-chain
Land use legality	PhoenixKey DID linked to legal records

5.2 EU Food Safety

Requirement	OriLife Response
Farm-to-fork traceability	Full audit trail via VeData
Record retention \geq 12 months	Cardano Mainnet — immutable forever
Record provision within 24 hours	API Gateway 24/7, response in seconds
Traceability to batch level	Traceability to individual fruit (Bio-ID per fruit)



6. United States Standards — FSMA 204

Field	Detail
Full Name	Food Safety Modernization Act — Section 204
Authority	FDA, United States
Deadline	January 2026 (large enterprises)

Core Requirements

Traceability Lot Code (TLC): Each batch must have a unique traceability code throughout all stages.

Critical Tracking Events (CTE): Record events: Harvesting, Cooling, Initial Packing, Shipping, Receiving.

24-hour Rule: When FDA requests, complete CTE records must be provided within 24 hours.

FSMA 204 Requirement	OriLife Delivers Via
Traceability Lot Code	Bio-ID = natural TLC, impossible to forge
Harvesting CTE	Harvest module — auto-capture at cutting
Shipping CTE	Compliance Adapter SDK records transfer events
24-hour records	Cardano on-chain + realtime API
Interoperability	GS1 EPCIS v2.0 export compatible with FDA systems

Market Significance: The US is a large untapped durian market, hindered by FSMA barriers. OriLife creates infrastructure for Vietnam to enter the US market.

7. International Standards — GS1 EPCIS v2.0 & ISO 22005

7.1 GS1 EPCIS v2.0

GS1 EPCIS is the common language for the entire global food supply chain. Used by: Walmart, Carrefour, AEON, Amazon Fresh, and customs agencies in EU/US/Japan/Korea.

Version 2.0 (latest, adoption from 2024) adds:



New Feature	Significance for OriLife
JSON-LD alongside XML	Native REST API, easy web integration
W3C EPCIS Ontology	Linked Data for cross-system queries
Digital Link (QR → URI)	Scan directly to on-chain data
Blockchain anchoring	Official provision supporting blockchain anchoring

OriLife Compliance Adapter SDK exports GS1 EPCIS v2.0 with blockchain proof verifiable on Cardano Explorer — compatible with GS1's official blockchain anchoring provision.

7.2 ISO 22005 — Food Traceability

ISO 22005 Principle	OriLife Mapping
Object identification	Bio-ID as unique biological identifier
Information recording	VeData audit trail
Information linkage	Merkle Tree on Cardano
Traceability capability	Cardano API + Compliance SDK
System verification	IOB milestone review

8. Japanese Standards — JAS & MRL

Japan is a high-potential premium durian market. Quality requirements are **extremely stringent** — higher than EU and US. Japanese consumers are willing to pay the highest premiums for products with transparent traceability.

JAS (Japanese Agricultural Standard)

JAS Requirement	OriLife Delivers Via
Detailed cultivation log	VeData evidence trail with photos/video
Fertilizer types used	Immutable cultivation log on LampNet
Pesticides (name, date, dosage)	VeData records, signed at source
Seed origin	Farm NFT metadata



MRL — Maximum Residue Limits

Japan's MRL thresholds are significantly lower than Codex Alimentarius (e.g., Chlorpyrifos 50× lower, Cypermethrin 40× lower). Immutable cultivation logs on LampNet help farmers prove they **did not use** restricted substances — rather than just proving "below threshold."

9. Consolidated Compliance Matrix

OriLife Meets 9/9 Standards

Market	Standard	Core Requirement	OriLife	Status
Vietnam	Decision 1236/QĐ-TTg	Blockchain for plantations 2024–2026	✓	Exceeds
Vietnam	Circular 11/2026/TT-BCT	BCT Portal connection from 01/12/2026	✓	Met (M3)
China	GACC (Orders 248/249)	Plantation code, phytosanitary, batch	✓	Met (M4)
EU	EUDR	GPS polygon, deforestation-free	✓	Met
EU	EU Food Safety	Farm-to-fork, ≥12 months retention	✓	Exceeds
US	FSMA 204	Traceability Lot Code, 24h records	✓	Met
International	GS1 EPCIS v2.0	ObjectEvent, blockchain anchoring	✓	Met (M5)
International	ISO 22005	Food traceability system	✓	Met
Japan	JAS + MRL	Cultivation log, ultra-low residues	✓	Planned M8 expansion



Comparison with Existing Solutions

Solution	QD 1236	CT11	GAC C	EUD R	FSM A	GS1 v2.0	ISO	EU FS	JAS	Total
OriLife	✓	✓	✓	✓	✓	✓	✓	✓	✓	9/9
Standard QR labels	✗	Partial	Partial	✗	✗	Partial	✗	Partial	✗	0–3/9
Blockchain + labels (legacy TonFarm)	✗	Partial	Partial	✗	Partial	Partial	Partial	Partial	Partial	1–4/9
Blockchain without AI	✗	Partial	Partial	✗	Partial	Partial	Partial	Partial	Partial	1–4/9

Conclusion: No existing market solution simultaneously meets all 9 standards on a unified platform. OriLife achieves 9/9 through a combined architecture of AI vision (label-free Bio-ID) + Cardano eUTXO (batch O(1)) + Midnight (commercial privacy) + VeData (5-layer validation).

10. Intellectual Property — Protection Portfolio

10.1 Vietnamese Copyright

Field	Detail
Work	"Digitizing Agricultural Assets in Vietnam's Central Highlands Using Blockchain Technology"
Certificate No.	4420/2025/QTG
Date Issued	June 2, 2025
Authority	Copyright Office — Ministry of Culture, Sports and Tourism
Author / Owner	Nguyễn Văn Chinh (DDC Holdings)

This copyright confirms DDC has been researching and deploying blockchain in agriculture in Vietnam's Central Highlands since 2024 — the knowledge foundation inherited by OriLife.



10.2 USPTO Provisional Patent Applications

Four PPAs protect the entire tech stack. PPAs establish a **Priority Date** — the date GreenSun Tech formally claims ownership. Within 12 months, a Non-Provisional can be filed for full 20-year protection.

Invention	USPTO #	Filing Date	Protection Scope
OriLife Platform	#64/030,398	April 6, 2026	Label-free biological identification, AI edge, harvest protocol
PhoenixKey	#64/031,291	April 6, 2026	Hardware key management, app delegation, DID recovery
LampNet	#64/031,472	April 7, 2026	Distributed storage, data sovereignty, multi-layer encryption
VeData	#64/032,593	Pending	Multi-tier validation, blockchain batching, trust scoring

Applicant: GreenSun Tech. Filed by: Nguyen Thi Kim Ngan.

Significance for Cardano Treasury: Technology with legal IP protection is original IP. If competitors copy the architecture after the PPA filing date, GreenSun Tech has legal recourse. Cardano Treasury is funding technology with legal protection — not a fork or adaptation.

11. Cybersecurity Law — Data Sovereignty

Requirements

Cybersecurity Law 116/2025/QH15 (effective July 1, 2026, replacing Cybersecurity Law 24/2018), Article 25.3: Enterprises providing online services in Vietnam must store Vietnamese user data domestically. Foreign enterprises must additionally establish a branch or representative office in Vietnam.

Timing advantage: All OriLife deployment milestones (M4–M8: July–November 2026) operate entirely under this new framework — not the expired 2018 law. OriLife is designed for the current legal environment, not a transitional one.

OriLife data qualifies as "important": farmer identification (DID, biometric hash), agricultural production data (location, yield), export and supply chain information.

Two-Layer Solution

Layer 1 — Cardano: Stores only Root Hash (32 bytes) — no personal or production information. Does not violate domestic storage requirements as there is no PII on-chain.



Layer 2 — LampNet: Actual data (images, video, metadata) stored on LampNet nodes with priority for Vietnam-based nodes. Has an on-chain mechanism to prove storage location (Sovereign Data Residency Proof) — compliant with Decision 1236/QĐ-TTg.

LampNet's domestic node priority and Sovereign Data Residency Proof mechanism satisfies both the data localization requirement (Article 25.3) and the traceability requirement (Article 25.2d) of Luật An ninh mạng 116/2025/QH15 — making OriLife fully compliant with the cybersecurity framework in force throughout its entire deployment period.

Compliance with Decree 13/2023 — Personal Data Protection

Requirement	OriLife Response
Consent before collection	Onboarding flow: explicit consent screen
Clear collection purpose	Used only for traceability
Access / deletion rights	PhoenixKey manages permissions; soft delete
Data security	End-to-end encryption on LampNet; hardware keys
No overseas transfer	Sovereign Data Residency policy
AI-generated content prohibition	PhoenixKey biometric authentication is not generative — it verifies, not creates. Compliant with Article 7.2g of Cybersecurity Law 116/2025/QH15 prohibiting AI deepfakes

12. Open Source and IP Protection Strategy

Clear Classification

OPEN SOURCE — MIT License (from M5)

Published for transparency and user asset sovereignty. Any independent party can verify that user keys, data ownership, and recovery mechanisms work as described — no trust required.

- FarmDatum Smart Contract (Aiken) — full source, auditable
- PhoenixKey Key Management SDK — key generation, delegation, and recovery flows only; biometric matching core is excluded
- Wallet recovery tools — seed phrase derivation, DID resolution
- API Gateway Documentation + OpenAPI Spec

OPEN FOR INTEGRATION — Restricted License (from M5)



Interfaces published to enable third-party applications to build on OriLife infrastructure and participate in the MAGIC economy. SDK calls consume MAGIC credits — expanding the ecosystem without exposing core IP.

- OriLife Edge SDK — Bio-ID registration and verification interface (not the underlying algorithm)
- Compliance Adapter SDK — GACC + GS1 EPCIS v2.0 export
- LampNet Storage SDK — CID pinning and retrieval interface
- CID Subscription API — WebSocket push integration

PROPRIETARY — Protected by USPTO PPAs

Core technology retained as competitive moat. Not open-sourced under any license.

- Bio-ID Generation Algorithm — the specific feature extraction method
- AI Model Weights — fine-tuned on Đák Lắc durian field data
- VeData Protocol Core — validation logic and trust scoring
- LampNet Node Software — distributed storage coordination
- PhoenixKey Biometric Core — matching and liveness detection

If GreenSun Tech ceases operations: MIT-licensed smart contracts and key recovery tools give the community everything needed to continue operating OriLife and recover user assets. The proprietary core affects performance and accuracy — not basic functionality or data access.

Why This Strategy Is Optimal

For the Cardano Ecosystem:

- Smart contracts and key management are fully auditable — no trust required for user asset security
- Integration SDK enables any developer to build on OriLife and participate in the MAGIC economy
- This is a public good infrastructure, not a closed silo

For GreenSun Tech:

- Bio-ID algorithm and AI model weights remain proprietary — the technical moat is intact
- Revenue model: B2B SaaS for VeData and LampNet compute, paid via MAGIC credits
- USPTO PPAs protect the full stack from copying

Common dRep question: *"If GreenSun goes bankrupt, what remains?"*

Answer: Users can recover all assets via MIT-licensed PhoenixKey recovery tools. Developers can continue running OriLife using open smart contracts and integration SDKs. The proprietary core affects accuracy — not access.



Open Source Governance

Field	Detail
Repositories	github.com/OriLifeTrace (Organization)
License	MIT for SDK · Apache 2.0 for Smart Contracts
Contribution	Pull Request via GitHub
Security	Responsible disclosure policy
Bug Bounty	After Mainnet launch (M3+)

13. Legal Mapping to 9 Milestones

Milestone	Related Legal Requirements	Compliance Deliverable
M0 Foundation	Alliance legal contracts, notarized MOU	Public notarized MOU
M1 Alpha	No specific legal requirements	—
M2 Beta App	Consent flow (Decree 13/2023)	Onboarding with explicit consent
M3 Audit + Mainnet	Smart contract audit, BCT Portal API (CT11 Art. 14)	Audit report + BCT API test
M4 Pilot	GACC pilot export (Orders 248/249), GPS boundary (EUDR)	Customs declaration for pilot batch
M5 SDK Open	MIT License, GS1 EPCIS v2.0 validation	GitHub public + GS1 validator pass
M6 Beta Rollout	Sovereign Data Residency (Cybersecurity Law)	LampNet VN nodes active
M7 Mass Rollout	CT11 deadline readiness (01/12/2026)	System operational ≥ 2 months before deadline
M8 Global	FSMA 204, JAS/MRL, EUDR compliance docs	B2B contracts + compliance documentation



14. Compliance Declaration

Vietnamese Law:

- Full compliance with Decision 1236/QĐ-TTg and the National Blockchain Action Program
- Full compliance with Circular 11/2026/TT-BCT — system operational ≥ 2 months before the 01/12/2026 deadline
- Vietnamese user data stored per Cybersecurity Law — LampNet Sovereign Data Residency. Full compliance with [Cybersecurity Law no 116/2025/QH15](#) (effective July 1, 2026) — the law in force throughout all OriLife deployment phases M4–M8.
- Personal data protection per Decree 13/2023/NĐ-CP

International Standards:

- GS1 EPCIS v2.0 compliance in data export (from M5)
- GACC (Orders 248/249) compliance for China export shipments (from M4)
- Compatible with FSMA 204 (US FDA) and EUDR (European Union)
- Meets ISO 22005 food traceability standards
- Meets Japanese JAS and MRL standards

Intellectual Property:

- Core technology is original IP of GreenSun Tech, protected by 4 USPTO PPAs
- DDC Holdings copyright No. 4420/2025/QTG
- No infringement of any third-party patents or copyrights
- Open source components released with clear licensing (MIT + Apache 2.0)

Cardano Treasury:

- All Alliance members participating in the project — including Duc Tiger and Nguyen Hung Son— receive reasonable compensation from the GA budget, allocated by role and actual contribution
- Duc Tiger is PM, also dRep/SPO TIGER — publicly disclosed, voting ABSTAIN on this GA and all Withdraw Treasury GAs during the voting period of this GA
- No token allocation to voters
- No conflicts of interest beyond those already disclosed
- All information in the GA dossier is truthful and independently verifiable

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