

9 July 2025

To: European Policy Makers

Subject: Ensuring an Equitable and Timely Implementation of the EUDR in the coffee sector

Dear Esteemed EU Leaders,

On behalf of the VOCAL Network, we write to express our deep concern over recent delays and proposed alterations to the European Union's Deforestation Regulation (EUDR), particularly discussions surrounding a "zero-risk" category and extended postponement of its implementation.

We urge the EU to uphold its commitments to the EUDR.

This landmark policy is needed in order to enable responsible sourcing, corporate accountability, environmental protection, and equity for coffee producers and origin countries who are committed to sustainable practices.

Further Delays and the "Zero-Risk" Category will make the EUDR defunct

We acknowledge the European Commission's commitment to tackling deforestation through the EUDR and the progress already made in publishing guidance and FAQs. However, we are alarmed by recent policy developments proposing further delays or legislative revisions to introduce a "zero-risk" category. These moves threaten to:

- **Undermine legal certainty** for actors who have already invested heavily in compliance.
- **Favor large multinational supply chains** over those from smallholder-based origins by creating bifurcated compliance regimes;
- **Exacerbate existing inequalities**, especially for smallholder producers in tropical regions, by removing incentives for traceability and forest governance reforms;
- **Delay long-overdue action** on environmental and human rights abuses that the EUDR was designed to address.

Such proposals would turn the EUDR into a trade barrier and render the regulation toothless by removing both transparency and accountability from supply chains.

What is needed to support Origin Countries and Producers

In addition to fulfilling this milestone in EU environmental policy without delay, we strongly urge the EU to work with origin governments and coffee producers to develop a realistic and inclusive path toward compliance within production countries. This must include:

- The EU pairing EUDR enforcement with **sustained financial and technical support** to help producer countries build inclusive traceability, land legality, and farm mapping systems.
- The EU **ensuring smallholder inclusion** by funding digital access, training, and fair market incentives—especially for marginalized groups.
- The EU providing **flexible, pooled financing and recognize transitional compliance pathways** to make EUDR implementation equitable and achievable.

Strong support to the EUDR from the Coffee Industry

Multiple coffee companies have voiced strong support for the EUDR. They have reiterated that coffee industry compliance investments have already been made. They have developed traceability systems, implemented risk assessments, and integrated due diligence processes aligned with EUDR requirements. Multiple coffee industry statements note that further delays or changes or watering down of the EUDR would introduce uncertainty and jeopardize the significant investments already made across the sector, thereby penalizing companies that were willing and able to comply and rewarding lowest-performing non-compliant companies.

In doing so, these companies align with the cross-commodity statement signed by leading companies—including [Nestlé](#), Ferrero and [Tchibo](#) — and with individual statements by coffee companies such as [NKG](#), and [Dallmayr](#), [Lavazza](#), [Olam](#), [Illycaffè](#), [JDE](#), [LDC](#), [Melitta](#), [4C](#); which clearly oppose reopening the legislative process, and oppose further delays to the EUDR.

We respectfully call on the European Union to:

1. **Resist calls for regulatory reopening or zero-risk classification**, which would favor low-transparency markets over those working toward reform;
2. **Ensure the EUDR enters into force as scheduled**, with continued technical clarifications via guidance documents rather than legislative overhauls;
3. **Create mechanisms for producer support**, including financial and technical assistance for smallholder mapping, due diligence, and deforestation-free verification;
4. **Foster transparent dialogue** with civil society and producer country governments to address implementation challenges collaboratively.

The EU has a critical role to play in ensuring that its environmental regulations do not reinforce inequality or exclusion. VOCAL stands ready to work with EU institutions to ensure that the EUDR becomes a force for global equity, climate justice, and sustainable trade.

The co-authors of this message, the VOCAL Network, form a global coalition of civil society organizations from coffee-producing and consuming regions that work collectively to build a more just and sustainable coffee sector. Our vision is a coffee industry where value, risk, and power are equitably shared, enabling smallholder farmers and workers to earn a living income or wage in decent working conditions.

Sincerely,

Antonie Fountain

Executive Director, VOCAL Network

On behalf of the VOCAL Network Members:

CoffeeWatch

Fairfood

FERN

Inkota

Oxfam Belgium

Public Eye

Rikolto

WWF Switzerland



OXFAM Novib



**COFFEE
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 Berne Declaration