Deutsche Umwelthilfe

Drinking Deforestation?

Why clear rules are essential for coffee supply chains

Deutsche Umwelthilfe in cooperation with Coffee Watch

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COFFEE WATCH

Disclaimer
All companies taking part in the survey agreed to the publication of their information.

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Deutsche Umwelthilfe e.V. (DUH)
Environmental Action Germany
Head Office Berlin
Hackescher Markt 4
10178 Berlin, Germany
Tel.: +49 30 2400867-0
E-Mail: berlin@duh.de

Text:	***Deutsche Umwelthilfe:*** Tabea Schiffer, Maik Jerusalem, Laura Bengel, Svane Bender, Tina Lutz; ***Coffee Watch:*** Etelle Higonnet
Editing:	Tina Lutz, Svane Bender
Design:	Didem Sentürk (DUH)
Image credits:	Cover: DUH Montage, AI-supported Icons: Kamrun8, LocalVector/AdobeStock

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Summary

Global coffee supply chains are associated with significant environmental and human rights violations.

Key environmental challenges in natural resource management that directly affect German coffee companies and their coffee supply chains include: deforestation, water pollution, soil degradation, and loss of biodiversity. Furthermore, human rights abuses in coffee such as modern slavery, child labor, extreme poverty, and restrictions on trade union rights are widespread.

The **EU Deforestation Regulation (EUDR)**, the German **Supply Chain Due Diligence Act (LkSG)**, and the European **Corporate Sustainability Due Diligence Directive (CSDDD)** create legally binding frameworks that are intended to lead to greater transparency, due diligence, and risk management, and to ensure minimum standards – including in coffee supply chains.

However, these regulations are under considerable pressure: Just a few weeks before the agreed entry into force of the EUDR at the end of 2025, the regulation was postponed for another year and its content watered down. The latter decision aims to include exemptions for European primary producers and traders, which would result in a significant weakening of the law's traceability and transparency requirements, as well as reducing the possibility of strong enforcement and targeted sanctions for violations. In April 2026, it is expected there will be a further weakening of the regulation.

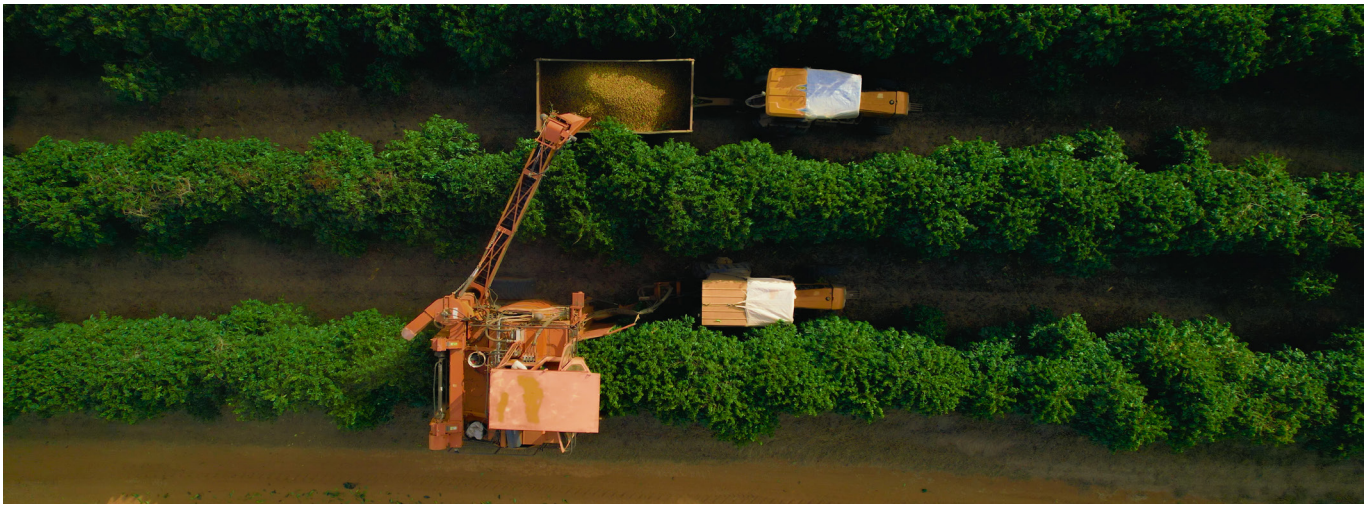
Almost simultaneously, the EU Commission, the EU Council, and the European Parliament agreed on a significant weakening of the CSDDD as part of the "Omnibus I" process. In particular, its scope of application was greatly narrowed, with due diligence obligations now only applying to companies with over 5,000 employees and at least €1.5 billion in turnover. The newly developed directive will only apply to around 30% of the companies covered under the original version. In addition, key obligations such as EU-wide harmonized civil liability and mandatory climate transition plans were weakened, removed or diluted.

These recently adopted changes create uncertainty and disadvantages for companies and producers that have already invested in transparent and responsible supply chains in anticipation of the previously announced and partially adopted legislation.

Against this backdrop, **this study examines the implementation status of relevant environmental and human rights due diligence obligations by German coffee companies, based on their self-reported information**. The study does not assess compliance of their measures with legal requirements.

Twenty-one companies from the retail, catering, and processing sectors provided detailed information on their traceability, data collection, risk analysis, management systems, and support and complaint mechanisms. **The results show that many companies have established initial structures and are actively working to increase transparency.** Traceability systems, sustainability strategies, and climate plans are common measures to minimize risk and cooperate with suppliers. **Most companies are already making efforts to comply with legal requirements. At the same time, this progress is not sufficient to effectively address the structural problems in coffee production.** Certifications are falling short both politically and in practice; data collection is sometimes incomplete, and support for producers, especially smallholders, is often only project-based rather than systematic and sustained. Significant room remains for improvement in terms of sustainability in supply chains and adaptation measures in response to climate change.

This study demonstrates that companies need clear, binding, and stable regulatory frameworks to be able to invest in sustainability in the long term. A significant weakening of the LkSG, EUDR, and CSDDD not only increases environmental and social risks, but also disadvantages those companies that are already taking responsibility. Reliable rules are crucial for creating fair competition, empowering smallholder farmers, and ensuring sustainable supply chains in the coffee sector. While some coffee companies are making intensive efforts to ensure ethically responsible production conditions, others largely disregard existing standards. The latter ones risk deceiving unwitting consumers who do not wish to support practices associated with serious human rights violations such as human trafficking, child labor, and environmental destruction, particularly deforestation. Our report indicates that **there is a clear need for binding regulations to create a level playing field for companies, with minimum sustainable and social standards for all**.



Mechanized and industrial coffee production is resource-intense and negatively affects soils and ecosystems. Source: Marcelo/AdobeStock

1) INTRODUCTION – FROM THE FIELD TO THE CUP

Coffee is one of the most popular beverages in the world, even surpassing beer in Germany. But when we enjoy our coffee, are we aware of where it comes from? How many hands has it passed through? What impact its cultivation had on local ecosystems, communities, and the climate? And what processing stages were necessary? Every coffee bean travels a long way from the plantation to our cup, and yet the environmental and social costs of this miracle bean are rarely discussed.

Coffee plants are cultivated in tropical climates with temperatures between 15 and 24 degrees Celsius and altitudes of 1,800 to 2,600 meters above sea level. They also require a lot of water to grow. Therefore, they are typically cultivated in regions with moderate to high rainfall or with the help of irrigation systems. Although cultivation in many coffee-growing regions is carried out through monoculture, agroforestry ("shade-grown") systems offer the advantage of providing shade for the sun-sensitive coffee plants, retaining soil moisture, and promoting biodiversity.

In countries such as Brazil, Indonesia, and Ethiopia, coffee is often picked by hand. Harvesting is backbreaking and almost always poorly paid. Seasonal workers mostly work under precarious conditions, without adequate occupational safety measures such as protective clothing, regulated working hours and breaks, or social security. The income of many smallholder farmers and coffee farm workers is so low that they and their families live below the **poverty** line defined by the World Bank.[2,3] According to an assessment by Coffee Watch, the extent of poverty in the coffee sector has been systematically underestimated to date, as existing surveys often do not include seasonal workers, unpaid family members, and other informal workers. Studies on coffee farms in China, Mexico, and Colombia demonstrate the extent of unregistered employment, which in turn makes data collection difficult and is associated with poor working conditions and legal violations.[4] There are numerous reports of **forced and child labor** in coffee cultivation throughout the coffee belt, including in Brazil,[5,6] Colombia, Costa Rica, Côte d'Ivoire, the Dominican Republic, El Salvador, Guatemala, Guinea, Honduras, Kenya, Mexico, Nicaragua, Panama, Sierra Leone, Tanzania, Togo, Uganda, and Vietnam.[7,8]

Coffee harvesting is manual labor that involves great physical strain in a tropical climate – often without protective clothing. Source : S J Lievano/AdobeStock

Furthermore, the average coffee consumer is usually unaware of how much forest in tropical countries is lost to coffee cultivation. Coffee cultivation is the sixth largest driver of **deforestation** worldwide: the World Resources Institute estimates almost two million hectares were deforested between 2001 and 2015.[9,10]

In addition, it is estimated that the EU, as a major coffee importer, is responsible for 30-40% of deforestation (*embodied deforestation* or hidden deforestation in global supply chains), which is far more than other supply chains covered by the EUDR Regulation.[11]

Plantations and farms are encroaching further and further into rainforests and other types of forest. According to Coffee Watch, Brazil lost over 11 million hectares of forest between 2001 and 2023, at least 300,000 hectares of which were directly for coffee cultivation.[12] This corresponds to an area more than three times the size of Berlin, deforested exclusively for coffee cultivation. The loss of these forests destroys habitats, reduces biodiversity, and releases large amounts of carbon.[13] Brazil is sadly not an exception; deforestation for coffee production also abounds in other tropical growing countries.[14] Due to local changes in the microclimate caused by deforestation combined with the effects of climate change, rainfall in these regions is becoming increasingly scarce with periods of drought, ultimately increasing the stress on coffee plants. Soil is leaching faster, and harvests are becoming less productive, which often has the consequence of new areas being cleared for cultivation. In Brazil's most important coffee-growing regions, rainfall deficits have occurred in 8 of the last 10 years since 2014.[15]

Coffee cultivation is the sixth largest driver of deforestation worldwide; Pará, Brazil. Source: Marcio I. Sa/AdobeStock

This confirms the prediction that coffee cultivation will have to take place in increasingly smaller areas in the future, as half the land currently used to grow coffee will no longer be suitable due to climate change. Coffee could become an endangered species.[16]

Another problem that continues to be largely overlooked is the use of **highly hazardous pesticides**. Evidence from major producing countries shows that coffee cultivation, particularly in monocultures, relies heavily on toxic chemicals. The use of more than 150 active pesticide ingredients has been documented, over half of which are classified as highly hazardous[17] and are already banned in the EU due to their unacceptable risks to human health and the environment.[18] Coffee farmers and farm workers, who often toil without adequate training or protective equipment, are exposed to the direct effects of pesticide use. This can lead to acute and chronic health problems, especially among pregnant women and children.[19]

The consequences for nature and the environment are no less serious: pesticides accumulate in the soil,[20] pollute waterways and drinking water,[21] and contribute to biodiversity loss, e.g., decline in pollinators. In the long term, this disrupts the resilience of coffee-growing areas, making farms less productive and plants more vulnerable to pests and climate shocks. This in turn increases the dependence on chemical inputs and forces farmers into an unsustainable cycle.[22]

Animal and plant species are directly affected by deforestation and destruction of habitat by expanding coffee plantations, for instance the Colobus monkeys in Ethiopia. Source: NickFox/AdobeStock

After coffee cherries are harvested, the beans are processed for export. The wet processing of coffee beans, which involves separating them from the pulp and washing them, uses a lot of water. This **contaminated water is often discharged, unfiltered as wastewater, into streams and rivers**, polluting them with organic residues. Similarly, the chemicals used (e.g. pesticides, fungicides, fertilizers) are washed out during processing and accumulate in soil and water, further damaging ecosystems and severely reducing the water quality. An average of 140 liters of water are required for the cultivation and processing of a single cup of coffee, which is an enormous **water footprint**.

Coffee roasting, the main source of added value, predominantly takes place outside the countries where the coffee is grown. Source: Georgii/AdobeStock

The coffee, packed in sacks, is transported in containers over long distances and then shipped. **International transport causes significant greenhouse gas emissions**: a container ship journey from Brazil to Germany, takes between 20 and 25 days on average. Most of the coffee for the German market is delivered via the ports of Hamburg or Bremen. However, 5% of the world's coffee is transported by air freight, which generates even higher greenhouse gas emissions than maritime transport.[23]

Further processing and roasting usually takes place in the importing countries, such as Germany. Most of the added value is generated during roasting. The EU imposes higher import tariffs on roasted coffee; significantly lower tariffs apply to unprocessed, so-called green coffee. As a result of this system, **roasting takes place mainly within the EU, while producing countries retain only a small share of the value creation**. Consequently, mainly large trading companies along the supply chain benefit, while farmers receive only a fraction of the final retail price. According to Coffee Watch, at least 5.5 million coffee farmers live below the poverty line of US$3.20 per day, while only between 1% and 10%, or a maximum of 11.5%, of the price we pay for a cup of coffee goes to the producers.[24]

Ultimately, **coffee ends up with consumers, in cafés, offices, and homes**. High consumption leads to high demand. According to the report "Get Deforestation Out of Europe's Coffee," the **EU imported approximately 2.54 million tons of coffee in 2022, which corresponds to 24% of global consumption**.[25] High coffee consumption continuously drives the need for new cultivation areas due to unsustainable farming methods. The cycle of deforestation and ecosystem destruction, low prices for producers and low wages for farm workers, and thus persistent poverty and social inequality, continues.

Who is responsible and what is the political framework?

The journey of coffee from plantation to cup shows that our coffee consumption is closely linked to environmental destruction and human rights violations in the global coffee market. Legal frameworks such as the EUDR, the CSDDD and the German LkSG are necessary to stop deforestation for coffee production, as well as violations of human rights and occupational safety standards. These frameworks should also guide companies towards more sustainable land use. In short, **we need these laws if we want to eliminate serious environmental damage and human rights violations from our coffee production.** German companies bear comprehensive responsibility for the sustainable use of natural resources and fair pay in their global supply chains. However, the protection standards and enforceability of these laws are currently being massively undermined. This puts companies who act responsibly at a disadvantage, as they must purchase and market ethically produced coffee under increasingly inequitable competitive conditions, while competitors gain cost advantages through exploitative practices such as child labor.

The EUDR aims to reduce the EU's contribution to climate change and biodiversity loss by prohibiting deforestation and forest degradation after the reference year 2020 for a range of deforestation-critical commodities such as beef, soy, wood, and coffee in European supply chains. It also aims to ensure compliance with legal requirements, such as those relating to human and labor rights in producing countries. **The EU Deforestation Regulation is intended to ensure that products imported into the European Union do not contribute to deforestation or forest degradation and have been produced legally.** In this way, the EU can address its consumption of deforestation-related goods, as around 10% of global deforestation is attributable to consumption patterns within the EU.

The EUDR aims to prevent deforestation from European consumption; Nongbone Village, Laos. Source: Slow/Saosavanh Ketmala

In the case of coffee, the EUDR currently requires companies to prove that their products have been produced without contributing to deforestation. Once the EUDR comes into force, all actors in the supply chain will be required to carry out due diligence checks. Companies must then be able to prove where the coffee was grown, when the beans were harvested, and whether this cultivation is compatible with the environmental and human rights standards applicable in the country of origin.

Since the EUDR adoption, its date of implementation has been postponed twice, most recently from the end of 2025 to the end of 2026, with an additional grace period for small businesses until mid-2027. **In addition, the due diligence obligations for companies have been reduced**: in the future, only companies that place a product on the EU market for the first time will be required to submit a due diligence declaration. Moreover, producers in the EU are exempt from certain due diligence obligations. This makes traceability, transparency, and control of violations of country-of-origin regulations much more difficult to monitor.

The postponed implementation means that EU consumption will continue to drive deforestation in the countries of cultivation, and abuses such as illegal land use, destruction of nature, and child labor will continue. The introduction of exemptions and simplified requirements makes it more difficult to detect and trace environmental destruction and illegal practices and to identify the responsible actors. This significantly weakens the impact, particularly in the coffee sector, where many smallholders are involved and the supply chain is complex.

The renewed postponement of the EUDR also creates new legal uncertainty in the EU and in the growing regions. Instead of providing clarity and supporting investment in sustainability, it undermines the credibility of the European sustainability framework.

The German Supply Chain Due Diligence Act (LkSG), which came into force in 2023, obliges companies to exercise human rights and environmental due diligence along their supply chain. The German LkSG is one of the first laws in the EU to hold companies accountable for addressing the social and environmental consequences of commodity production along their global supply chain. The scope of the LkSG covers both coffee producers and companies that import, market, and sell coffee. It obliges companies to systematically identify, prevent, and remedy risks such as child labor, forced labor, discrimination, or environmental destruction. In doing so, German lawmakers are putting a stop to the externalization of environmental and human rights costs in the supply chains of German companies. The law initially entered into force for companies with at least 3,000 employees, but since 2024 also applies to companies with at least 1,000 employees in Germany.

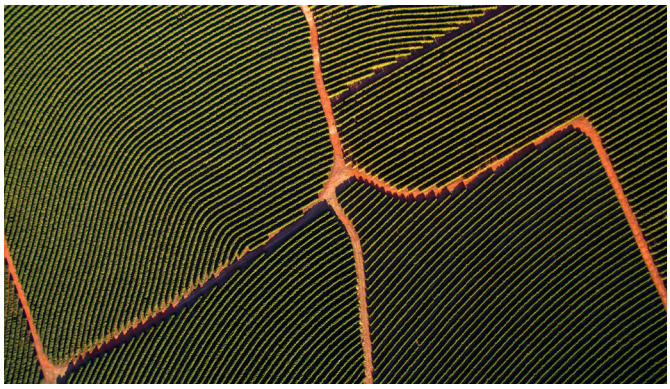
Child labor is still widespread in coffee-growing regions – CSDDD and LkSG are intended to prevent those practices; Copán, Honduras. Source: Martín Cálix

The LkSG, which was developed and passed under the initiative of the Christian Social Union's (CSU) development minister Müller, under chancellor Angela Merkel, is currently under massive attack. Instead of supporting companies by repairing infrastructure and digitizing administrative processes, legislators are currently weakening environmental and human rights protection standards. The LkSG is currently being used as a scapegoat for supposed 'excessive bureaucracy.' However, in adopting the LkSG, Germany has taken an important step toward reducing human rights and environmental risks along global supply chains, thereby also contributing to more transparent and resilient supply chains.[27]

The CSDDD is an EU directive which, like the LkSG, obliges large companies to systematically identify, prevent, and reduce risks to the environment and human rights along their supply chain. In the event of specific violations of the directive's environmental and human rights requirements, companies must take remedial action. However, member states can be more ambitious in their national laws. **For the global coffee sector, which is often characterized by low producer prices, poor working conditions, deforestation, and high climate risks, the CSDDD requirements offer an important opportunity for transformation toward more sustainable business models.** Through mandatory risk analyses, better complaint mechanisms, and responsibility for all suppliers, the CSDDD creates clear rules for fair and transparent supply chains. It promotes procedures designed to ensure living wages in supply chains, thereby strengthening farmers and cooperatives and forcing companies to rethink harmful purchasing practices. At the same time, the directive helps to curb deforestation and environmental destruction in coffee cultivation by requiring companies to use verifiably sustainable farming methods. Overall, the CSDDD can make a significant contribution to ecological and social improvement in the coffee sector and has an impact that goes far beyond existing certification systems.

In December 2025, **the scope of the CSDDD was significantly reduced** as part of the EU Commission's "Omnibus I" package; it now only includes companies with at least 5,000 employees and a net turnover of €1.5 billion. Previously, the threshold was lower, at 1,000 employees and €450 billion in net turnover. According to estimates, this will exempt approximately 70% of the companies previously covered by the CSDDD. As a result, a large part of the market remains uncovered. In addition, part of the civil liability provision, the mandatory climate plans, and the planned extension to the financial sector have been completely deleted. **These weakening measures could undermine the purpose of the directive and harm smallholder farmers and farm workers in supply chains.** At the same time, German companies that have already invested early on in more sustainable and transparent supply chains in anticipation of the LkSG and EUDR coming into force could be disadvantaged. This could create a competitive advantage for companies that have not yet taken compliance measures.

The following report reveals risks to nature and the environment as well as to human and labor rights in the German coffee supply chain. It also highlights the limitations of voluntary measures taken by the industry **and underscores the urgent need for supply chain legislation**—not only to ensure fair and environmentally friendly coffee production, but also to create a level playing field for all players in the coffee industry.



Industrial coffee production leaves no space for endemic animals and plants and degrades soils and water; Minas Gerais, Brazil. Source: paulovilela/ AdobeStock

2) Methodology

For this report, high-revenue companies along the German coffee supply chain were systematically surveyed about their approach to traceability, sustainability, and human rights due diligence obligations. The aim was to gain a realistic picture of the current state of implementation in Germany and how companies are responding to or preparing for the regulatory requirements of the EUDR and the LkSG.

2.1) Sample and selection criteria

The survey included companies that sell or process large quantities of coffee on the German market, including food retailers, gastronomy and wholesale companies, and coffee roasters with their own brands. Consideration was given to companies with more than 1,000 employees, as these fall under the scope of the LkSG. To obtain a comparative picture, Seeberger and und J.J. Darboven, companies below this threshold, were deliberately added. This inclusion of smaller companies was intended to show the extent to which the structures, implementation status, and scope for action of companies not legally bound by the LkSG differ from those of large companies subject to the LkSG, and whether key elements such as data collection, traceability, and risk management are also implemented without formal regulation. Moreover, the world's largest green coffee trader, Neumann Kaffee Gruppe (NKG), is a German company whose number of employees in Germany (in contrast to its global workforce) is just below the threshold for the LkSG and is therefore not subject to its obligations. We have nevertheless included it because it is one of the largest coffee trading companies in the world. In addition to large coffee traders, numerous supermarkets were also consulted, as a significant proportion of European coffee is sold in supermarkets. For instance, in Germany, 73 to 74% of coffee for home consumption is purchased supermarkets.[28] Ultimately, a total of 35 companies and the German Coffee Association were contacted. Twenty-one companies responded in detail by returning the completed questionnaire in the period from August to September 2025. These included: Aldi North, Aldi South, Alnatura, Bela, Dallmayr KG, Edeka, J.J. Darboven, JDE Peet's, Kamps, Kaufland, Lekkerland, Lidl, Melitta, Nestlé, Netto Marken Discount, Neumann Coffee Group, New Coffee, Penny, Rewe, Seeberger, and Tchibo. Only responses from these companies were evaluated.

2.2) Data collection

Data was collected using a standardized questionnaire, which was sent to the companies as a document via email and also returned via email once completed. The questionnaire was divided into six thematic clusters covering key elements of responsible supply chains. Each cluster comprised two to four questions. The questions were single and multiple-choice questions meant for self-assessment. The questionnaire included the following:

1. Traceability and transparency
   - » Is there traceability throughout the entire supply chain, from the cultivation area to the end product?
   - » Which supply chain models do you use for the certification of your goods?
2. Data collection and environmental information
   - » Is geodata on the cultivation areas collected?
   - » Is data on the use of pesticides collected?
3. Strategic anchoring and management systems
   - » Are sustainability and human rights due diligence (ESG) integrated into the business strategy?
   - » Is an ESG risk management system being implemented?
   - » Is a publicly accessible sustainability report (e.g., on the website) being prepared?
   - » Is a "climate protection plan" with specific targets (e.g., CO_2 reduction along the supply chain) being developed?
4. Risk analysis on human rights and environmental risks
   - » Are regular risk analyses on deforestation and environmental impacts carried out, documented, and shared with the authorities?
   - » Are regular risk analyses on child labor, occupational safety, and fair wages carried out, documented, and shared with the authorities?
   - » Are regular risk analyses on land rights conflicts carried out, documented, and shared with the authorities?
   - » Do you take concrete measures to avoid ESG risks? If so, what type of risks do you take measures against?
5. Cooperation and support in the supply chain
   - » Do you support the smallholders in your supply chain in implementing the EU Deforestation Regulation (EUDR)? If so, how?
   - » Is there a supplier code of conduct with binding standards? If so, what measures do you take if suppliers violate your standards?

6. Remedy, compensation, and complaint mechanisms

- » Is there a complaint mechanism for affected parties (e.g. hotline or online platform)?
- » Do you take concrete measures to remedy or compensate for any damage caused? If so, what kind of damage?

Finally, we asked companies to provide a statement outlining their stance on the current negotiations regarding the amendments to the EUDR and LkSG. In light of the recent postponement of the implementation of the EUDR announced at the end of 2025, companies were provided the opportunity to update their statements accordingly.

2.3) Evaluation procedure

The quantitative analysis was based on a points system incorporated into the questionnaire, making the companies' self-assessments systematically comparable. The evaluation was based exclusively on the information provided by the companies. Between zero and three points could be achieved per question; unanswered questions were scored with zero points. Point averages were then calculated for all clusters, which were graded in the results table (unsatisfactory/red: 0≥0.9; requires improvement/orange: 1≥1.9; acceptable/yellow: 2≥2.9; good/green: 3). For the overall rating, all six cluster values were added together and classified by color (red: 0-4.4; orange: 4.5-8.9; yellow: 9-13.4; green: 13.5-18).

In addition, qualitative information (comments) was evaluated in terms of content, but not included in the scoring. These qualitative statements are included in the report in the form of quotations to provide context and insight into the motivations, challenges, and positions of the companies.

3) Results – This is how the largest coffee companies in Germany are positioned

3.1) Traceability & transparency

There are various traceability and procurement models for supply chain products. Four methods are particularly common and applicable to the coffee supply chains:

In the **Segregated supply chain model**, raw materials from certified sources are strictly physically separated from raw materials without sustainable certification, so that it can be guaranteed that a product consists of 100% sustainably certified raw materials.

In the **Identity Preserved (IP) model**, raw materials are completely segregated and additionally assigned to their respective farms or cooperatives, allowing them to be traced back to the producers. For example, it is then possible to see which field the coffee was grown in.

In the **Mass Balance** model, certified and non-certified raw materials are mixed rather than physically separated, with only the proportion of certified raw materials being tracked. For example, if a company purchases 30% certified coffee, 30% of its products can be sold as certified coffee. This model offers less transparency for consumers but is easier to implement economically.

Lastly, in the **Book & Claim model** (certificate/credit trading) sustainability certificates are purchased separately and independently of the supply chain. There is no transparent monitoring within the supply chain. This model is less common in the coffee trade, but more common in the palm oil or energy trade.

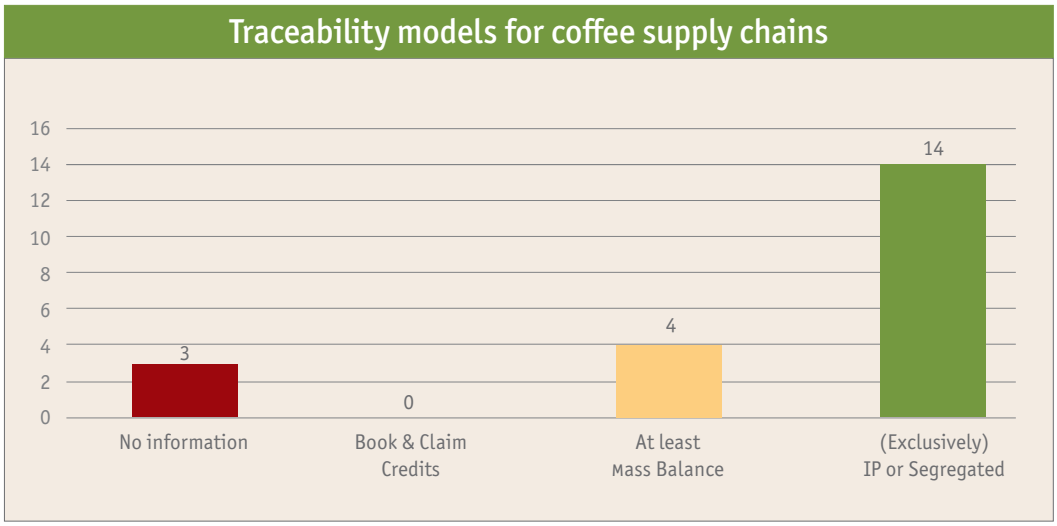


***Figure 1** - Distribution of supply chain models within the 21 companies surveyed.*
Source: own illustration

The survey shows that traceable and transparent supply chains are increasingly being implemented by German coffee companies, but that gaps remain. Of the 21 companies surveyed, 16 companies state that they have achieved complete segregated traceability (at least IP) across the entire supply chain, from cultivation to the end product. Most companies therefore use IP-based or Segregated supply chain models. In addition, four companies state that they use at least a Mass Balance supply chain model. JDE Peet's and Lidl provided duplicate information, stating that they use at least Mass Balance as well as IP or Segregated supply chain models. None of the companies stated that they use a Book & Claim model or certification. Bela, Edeka, and Netto Marken-Discount did not provide any information about the supply chain models they use.

This information clearly shows that the use of supply chain models such as Book & Claim and certificates are increasingly considered outdated approaches to traceability. Instead of such purely certificate-based, non-physical models, German coffee companies are increasingly relying on procedures that enable actual and verifiable traceability along the entire supply chain. Segregated models, in particular IP-based approaches, are gaining importance as they enable raw materials to be clearly traced to specific growing regions or even individual farms, significantly enhancing transparency and control.

At the regulatory level, the EUDR requires clear, geographically-precise traceability down to the land parcel level. Models such as Book & Claim, which do not ensure segregated traceability, do not meet this legal requirement and are therefore becoming less relevant. Instead, companies are increasingly relying on models that can demonstrate physically separate and/or clearly traceable supply chains and, according to their own indications, are thus prepared for the introduction of the EUDR in this regard.

Transparent traceability via GPS data is crucial for the EUDR; many companies are ready for its implementation. Source: kenchiro168/AdobeStock

The EU's decision from December 2025 to postpone the start of the EUDR's application and the planned watering down of the regulation weaken these core elements: for example, geodata requirements for small producers, particularly in the EU, are expected to be reduced and simplified due diligence statements (i.e. for supermarkets) are expected to be permitted. This undermines companies' existing efforts to ensure comprehensive transparency. The survey shows that many German stakeholders already ensure traceability up to the cultivation area. Instead of undermining these efforts, it is necessary to provide targeted support to all stakeholders, especially small farmers, to fully implement the requirements of the regulation.

Reducing geodata requirements or simplifying due diligence declarations does not change the structural complexity of supply chains but rather makes it more difficult to compare and trace data. Precisely because of their complexity, companies depend on reliable and complete information to effectively assess risks. Watering down the requirements creates more uncertainty instead of providing real relief. After all, the EUDR aims to create clear and transparent framework conditions for companies. Where rules and transparency are lacking, risks to companies, people, and the environment in company supply chains increase.

3.2) Data gaps in environmental information

The results for the data collection cluster are the worst on average when compared to the other clusters and highlight the existing gaps in the data available for environmental reporting. There are significant gaps in the collection of data on pesticides. Almost half of the companies surveyed state that they collect little or no data on the use of pesticides (see Figure 2). Only Alnatura and JDE Peet's report that they collect information on plant protection products for all cultivated areas. This shows that collecting such data is fundamentally possible and realistic.

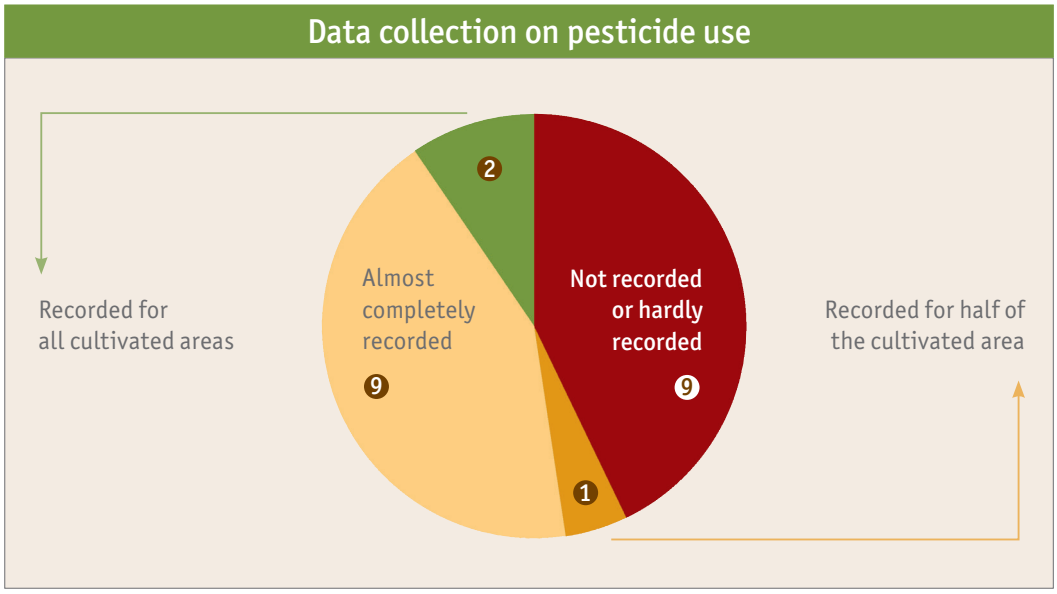


Figure 2 - Company information on data collection for pesticides used. Source: own illustration

The collection of geodata on cultivated areas also shows significant shortcomings. Of the companies surveyed, only three (Kamps, Lidl, Seeberger) state that they collect complete geodata on all cultivated areas, which shows that comprehensive data collection is possible for both small and large companies. 13 companies collect almost complete data. In contrast, four companies collect little or no geodata, and only one company has geodata for about half of its cultivated areas (see Figure 3).

A lack of binding requirements for data collection leads to inconsistent standards and fragmentation: gateways for human rights and environmental violations; Brazil. Source: Nexa/AdobeStock

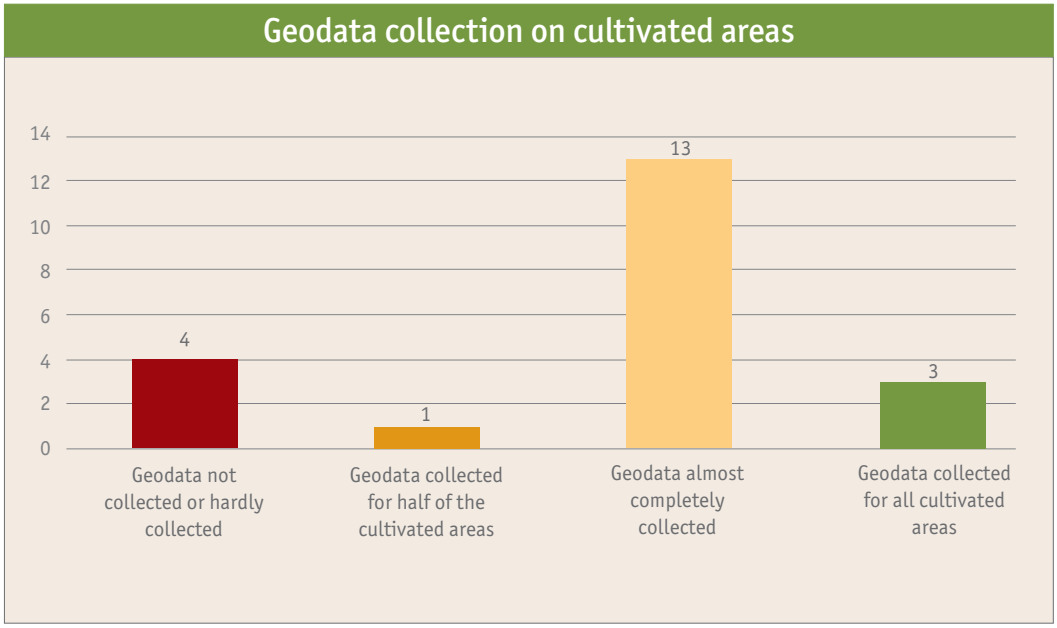


Figure 3 - Company information on geodata collection for cultivated areas. Source: own illustration

However, there remain gaps that make consistent monitoring difficult. Even comprehensive geodata collection does not automatically lead to complete traceability if this information is not embedded in robust and standardized supply chain models. This is precisely why such corporate approaches should be strengthened, not weakened, by clear legal frameworks such as the EUDR.

The results also highlight the limitations of voluntary measures: while some companies collect detailed environmental information, the lack of binding requirements continues to result in inconsistent standards, fragmentation, and insufficient integration into existing traceability systems. The result is an inconsistent data landscape that neither creates transparency nor effectively addresses environmental risks. Legal uncertainty risks discouraging even committed companies from making major investments into improving their transparency.

Thus, an ambitious implementation of the EUDR is essential. The regulation requires clear geographical allocation of the raw materials down to the parcel level, thereby closing precisely those gaps that exist in voluntary data collection. It transforms previously non-binding and often partial efforts into clear, verifiable processes. Companies that already collect "almost complete" geodata are thus provided with a regulatory framework that supports their ambitions and gives them planning security. On the other hand, companies that have hardly collected any data to date are encouraged to set up robust systems.

3.3) Strategic anchoring & management systems

The analysis shows that sustainability and human rights due diligence (ESG) already play a central role in the business strategy of the companies surveyed in Germany. Of the 21 companies surveyed, 16 stated that they had fully integrated ESG into their business strategy, while the remaining companies had at least partially implemented corresponding measures. No company is in the phase of non-implementation.

However, the picture is more mixed when it comes to the implementation of ESG risk management systems: only 11 of the 21 companies already have a fully implemented ESG risk management system, while the remaining companies have only partially established risk management. This illustrates that, despite the strategic anchoring of ESG principles, practical implementation in the form of standardized risk management systems has not yet been completed across the board.

With the exception of Dallmayr KG, all companies publish an annual sustainability report. Instead, Dallmayr KG reports on sustainability activities on its website.

Furthermore, 10 out of 21 companies have already fully developed and implemented climate protection plans, while 7 companies state that they are in the process of developing climate protection plans. We did not evaluate the content and ambitions of the respective climate plans as part of the study.

Overall, it can be said that German coffee companies recognize the importance of ESG as an integral part of their business strategy and have created initial ESG management structures. At the same time, there is still a need for action, particularly in the systematic recording and management of ESG risks via formalized management processes.

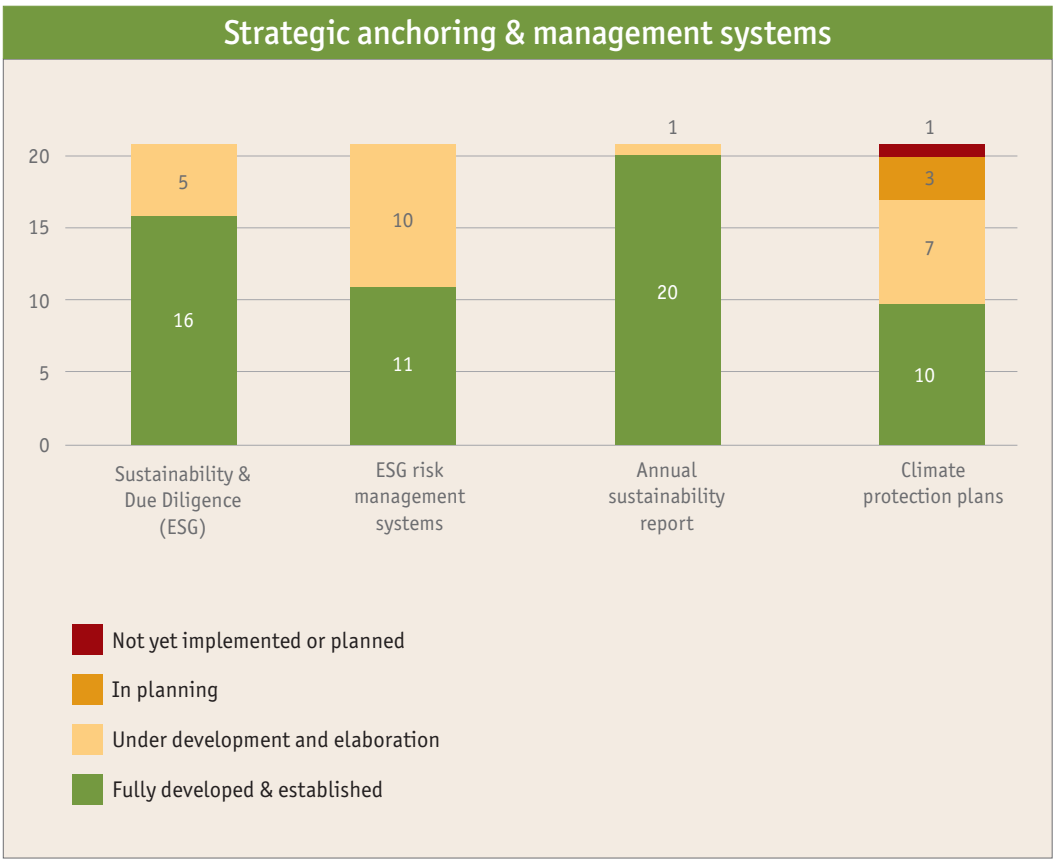


Figure 4 - Strategic anchoring and management systems in the companies surveyed. Source: own illustration

3.4) Risk analyses & prevention

All companies state that they have implemented measures to prevent ESG risks in the areas of the environment (e.g., biodiversity loss), social issues (e.g., working conditions), and governance (e.g., corruption). Regarding regular risk analyses, 18 out of 20 companies state that they carry these out at least once a year. According to the companies surveyed, appropriate measures are taken in particular in cases of land rights conflicts, but also in cases of deforestation, unfair wages, child labor, and occupational safety. However, according to the survey, in the areas of fair wages, child labor, and occupational safety, such measures are least frequently implemented.

The results show that although German companies are beginning to conduct risk analyses on deforestation, human rights, and land rights, these analyses—and the follow-up measures based on them—remain incomplete. Although all the companies surveyed demonstrate commitment and have appropriate structures in place, gaps in practical implementation are likely to occur when rules are unclear. (This report is based on self-assessments by companies, which have been accepted without verification. However, there are numerous indications that previous private initiatives and certifications are insufficient.[29])

3.5) Smallholders & supplier code

Support for smallholder farmers and cooperatives in the company's own supply chain, as well as the implementation of supplier codes (cluster 5), presents a mixed picture. Only 12 out of 21 companies offer training, exchange, or information services for smallholder farmers. Some companies point to their membership in multi-stakeholder initiatives such as the Global Coffee Platform, the use of software solutions via osapiens GmbH, or the activities of a certification organization such as Rainforest Alliance. However, the latter, for example, is repeatedly criticized by non-governmental organizations for not taking sufficient account of environmental protection, nature conservation, and fair wages.[30] For instance, according to the Christian Initiative Romero (CIR), at least 24 people were freed from slave-like working conditions on Rainforest Alliance-certified

coffee plantations in Brazil between 2021 and 2024.[31] All companies surveyed have supplier codes with sanctions to ensure compliance.

The current political debate on exemptions for small EU producers in the EUDR also underscores the importance of uniform rules. If smallholder farmers are exempt from due diligence obligations, there is a risk that:

- traceability at the point of origin will become obscure
- the gap between regulated and unregulated markets will grow
- small producers will have restricted access to sustainable supply chains and face an increased risk of exclusion or market losses

Overall, the results show that voluntary support measures and supplier codes are important building blocks of responsible supply chains, but their reach and impact remain limited. Without binding and uniform regulatory requirements, there is a risk that smallholder farmers and cooperatives will receive insufficient support and be excluded from sustainable supply chains.

3.6) Remedy, restoration, and complaint mechanisms

All companies surveyed state that complaint mechanisms for affected parties, e.g., hotlines or online platforms, exist.

However, the picture looks less positive when it comes to the question of whether measures are taken to remedy and compensate for damage caused. Lekkerland and J.J. Darboven report that they do not take any specific measures to remedy or compensate for any damage that may have been caused. Rewe, Penny, and Aldi South only implement measures in some cases.

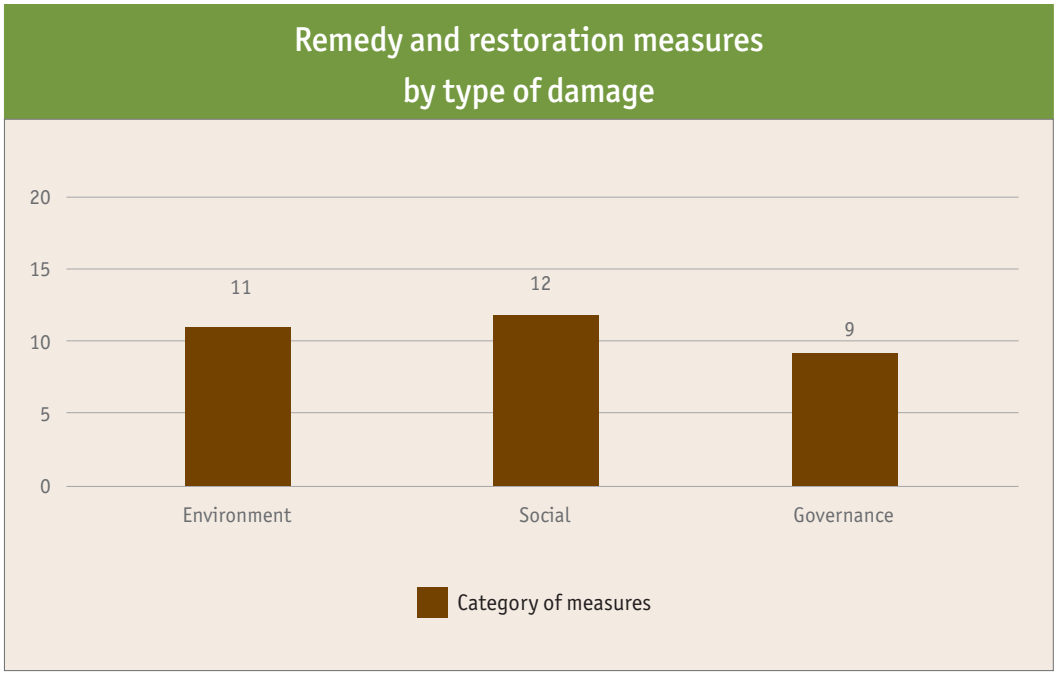


***Figure 5** - Measures for restoration or compensation of damage, by type of damage. Source: own illustration*

Among the companies that have established specific measures, those aimed at remedying negative social impacts are the most widespread, followed by those in the environmental sector and, lastly, those in the area of governance (see Figure 5). DUH would like to highlight that no follow-up assessment of the quality of the specific measures was carried out.

Company	Traceability & transparency	Data collection & environmental information	Strategy & management systems	Risk analysis & prevention	Cooperation & support	Remedy & complaint mechanisms	**DUH overall rating of companies**
Alnatura							
JDE Peet's							
Seeberger							
Nestlé							
Tchibo							
Kaufland							
Kamps							
Lidl							
Rewe							
Penny							
Edeka							
Netto Marken Discount							
Lekkerland							
Aldi South							
New Coffee							
Melitta							
Neumann Coffee Group							
Aldi North							
Dallmayr KG							
Bela							
J.J. Darboven							

Table 1 - Overall assessment resulting from questionnaires answered by 21 companies. Source: own illustration

ASSESSMENT: Insufficient Needs improvement Acceptable Good

4) RELIABLE RULES ARE NEEDED INSTEAD OF UNRAVELING ENVIRONMENTAL AND HUMAN RIGHTS STANDARDS – VOICES FROM THE COFFEE SECTOR

The EUDR, adopted in 2023, was supposed to come into effect at the beginning of 2025. On this basis, numerous companies made considerable investments in traceability, ESG systems, and risk management. Additionally, farmers in the Global South, such as coffee farmers in Brazil, also prepared for the introduction of the EUDR and have taken appropriate measures. A further postponement and watering down of the rules not only undermines trust, fair competition, and climate targets, but also disadvantages those companies and actors who acted early. Further delaying implementation until the end of 2026 (and mid-2027 for smaller companies) not only wastes valuable time urgently needed to protect our forests and the climate, but above all creates further uncertainty in the EU and in producing countries. Companies that were prepared for the introduction of the EUDR by the start of 2025, thanks to their appropriate investments in implementing the legal standards, will be penalized by higher transition costs as a result of the postponement to the end of 2026, as recently argued by the organization ClientEarth.[32]

As part of the survey, we asked companies to evaluate existing and planned legislation. Here are some of their responses (translated from German to English by the authors):

Tchibo:

„We view the renewed postponement of the EU Deforestation Regulation (EUDR) critically. It punishes those actors who have acted responsibly and made significant investments in implementing the requirements. This affects not only companies in Europe, but also farmers and producer organizations in the growing regions. The repeated discussions about short-term changes to the legal framework are causing uncertainty, destroying trust, and tying up resources that should be invested in effective measures to stop global deforestation."

Tchibo:

"[...] Raising the thresholds for employee numbers and turnover significantly reduces the number of companies covered and jeopardizes the level playing field. [...] Repeated postponements and the watering down of requirements penalizes those who have already made significant investments in compliance. The constant changes create uncertainty and destroy trust among companies, farmers, and producers. We call for reliable framework conditions that enable real change, instead of repeated watering down and ongoing discussions. We welcome the decision to implement a risk-based approach. [...]"

Aldi South Group:

"The ALDI SOUTH Group remains committed to the objectives of the EUDR and has invested considerable resources over the past two years to ensure its successful implementation. In view of current developments, we support a 12-month postponement to ensure legal certainty and operational feasibility."

Aldi North:

"We believe that the earliest possible date of application of the EU Deforestation Regulation would have been sensible in order to ensure that the targets are achieved in a timely manner."

We would also like to reflect the positions expressed in a joint statement by more than 140 investors and companies on the "Omnibus I" initiative against the simplification of the CSDDD regulation on October 1, 2025:

Aldi South Group:

"The ALDI SOUTH Group supports strong and harmonized EU sustainability rules, which is why it is vital that the core of the CSRD and CSDDD is preserved. Sustainability rules are not red tape. They are the foundation for long-term competitiveness and for the transition to a sustainable, thriving economy. Shared standards create trust, give customers and investors confidence, and ensure that businesses compete on a level playing field".[33]

Melitta:

"The protection of climate, biodiversity and human rights is a precondition of successful business in global value chains. Therefore, an EU-wide harmonized and easy to apply regulation fosters the competitiveness of European economics in a global landscape with increasingly strict legal requirements".[34]

The statements made by the companies paint a nuanced yet consistent picture. While some companies welcome the postponement of the EUDR's date of entry into force, they emphasize the economic importance of timely and reliable implementation. Simultaneously, many companies express concern about the current weakening of the LkSG and CSDDD. Several stakeholders make it clear that stricter environmental and human rights requirements do not constitute an obstacle to investment but rather form the basis for sustainable and long-term economic activity. They also emphasize that uniform environmental and social standards within the EU are crucial to ensuring fair competition. Many companies expressly reject any further postponement or watering down of the EUDR, pointing out that smallholder farmers worldwide have already made considerable investments in implementing the requirements, which would be jeopardized by ongoing regulatory uncertainty**. The statements from the companies speak for themselves: reliable rules are not an obstacle, but a prerequisite for progress.**

The extent of poverty in the coffee sector has been underestimated; data gaps must be closed to prevent exploitation. Source: PolacoStudios/AdobeStock

5) Policy Recommendations

The problems outlined above highlight the need for concrete action by politicians and businesses to effectively prevent environmental destruction and human rights violations in the supply chains of coffee consumed in Germany.

5.1) Recommendations for political action

1. Maintain the level of ambition of the supply chain laws that have already been passed, such as the EUDR, CSDDD, and LkSG, thereby creating planning security and a level playing field:

   - The EUDR is a central and indispensable EU instrument for the protection of forests and biodiversity. It must now be implemented as quickly as possible, without further adjustments to its content. Pioneering companies must receive special support. The traceability of deforestation-critical raw materials with polygons at the level of a legal entity (business, company, forestry association, etc.) must remain one of the central achievements of the EUDR in order to ensure accountability. Transparency in supply chains is essential to curb deforestation and rights' abuses. The blanket exemption of entire regions from these requirements undermines this principle and makes it more difficult for the authorities to carry out checks and take any necessary measures.
   - The German government should maintain the personal scope of the LkSG.
   - The German government should continue to promote initiatives in producing countries that support the implementation of requirements, such as those relating to the EUDR, especially for smallholder farmers.
   - The EU Commission should limit itself to necessary clarifications in the guidelines and FAQs and not propose any further substantive changes to the regulation. It must also urgently increase its data collection capacity.

2. **Ensure public procurement of exclusively deforestation-free and fairly produced products, thereby specifically promoting sustainable coffee production worldwide.** A shift in procurement in government agencies and public institutions could make a significant difference in the demand for sustainably-produced coffee in Germany and thus impact global coffee supply chains.

5.2) Recommendations for companies and producers

1. **Introduce robust monitoring systems to ensure deforestation-free production:** Companies should ensure that no illegal deforestation takes place in their entire coffee supply chain, regardless of whether laws require this. They should also minimize environmental and human rights risks in their supply chains and end existing abuses, regardless of any legal obligation to do so.

2. **Support smallholder farmers, data management, and traceability:** Companies should provide targeted support to their partners along the supply chain, especially smallholder farmers, to ensure the implementation of human rights and environmental standards. Systematic data management and complete traceability enable risks to be identified at an early stage, measures to be effectively controlled, and transparency towards stakeholders to be increased. If smallholder farms are not given further support, these producers' access to human rights- and environmentally friendly supply chains will be jeopardized, threatening the relocation of cultivation areas, a switch to crops other than coffee and thus a shortage of coffee production volumes, as well as long-term exclusion or market losses.

3. **Ensure fair remuneration for farmers, agricultural workers, and seasonal workers:** For their own interest, companies should ensure that workers are paid fairly and receive a living wage, that child and slave labor are excluded, and that sexual or psychological violence has no place in their coffee supply chain.

4. **Strengthen political commitment to clear framework conditions:** Companies should continue to actively engage with politicians and legislators to emphasize the need for clear, reliable rules. By forming cross-industry alliances and coalitions, they should present a united front to politicians in calling for clear and stable framework conditions for planning and investment security.

5. **Promote agroforestry instead of monoculture:** Companies should work together with their farms and suppliers on a binding transition to gradually convert to agroforestry systems. This will enable better adaptation to the effects of climate change, such as increased solar radiation, increasing soil dehydration, sunburn, and the death of plants. According to scientists' estimates, half of the land used for coffee cultivation could be lost by 2050.[35] However, more sustainable cultivation methods, such as agroforestry, could reduce these impacts. Additionally, such a transition would lead to the fulfillment of corporate climate targets, which have often existed only on paper and not been implemented.

Agroforestry coffee cultivation provides adaptation to the effects of climate change while offering a habitat for diverse animal and plant species; Costa Rica. Source: Hedvika/AdobeStock

6. **Consistently record and reduce agrichemicals to minimize carbon emissions while promoting biodiversity:** In coffee cultivation, highly toxic active ingredients that are often banned in the EU (WHO classification Ia/Ib) are used, partly due to a lack of consultation and weak regulation. Many smallholder farmers and farm workers work without adequate protective equipment, resulting in documented cases of acute poisoning and chronic health damage. In addition, heavy rainfall quickly washes the pesticides into the soil, rivers, and groundwater, causing long-term damage to water bodies, soil, biodiversity, and the health of the local population. It is not yet entirely clear whether these active ingredients are broken down during the coffee processing process or whether they can still be found in roasted coffee. The systematic recording of pesticides utilized in coffee cultivation is a key prerequisite for compliance with the LkSG and CSDDD. For companies, it creates transparency, legal certainty, and reliable sustainability indicators. According to our study some companies say they record the pesticides used on their farmland, demonstrating that this is possible. Recording and gradually reducing the use of pesticides should be in the companies' own interest, as it helps to preserve pollinators and other beneficial insects that are important to produce high coffee yields in the long term. Reducing fertilizers also minimizes carbon emissions from nitrogen fertilization while simultaneously lowering energy consumption and emissions for production and transport. Switching to sustainable, regenerative farming methods with organic fertilizers, avoiding chemical agents where possible, and diversifying tree species (e.g., in agroforestry) creates better conditions for biodiversity.

7. **Buffer the effects of climate change, reduce water consumption in processing and production in the nearby future and pay attention to water retention:** Climate change and its associated consequences are likely to change the coffee varieties valued by consumers in the long term. Water will become increasingly scarce. Producers and purchasing companies must switch to more sustainable forms of cultivation and processing soon and ensure water retention in the landscape through, for example, forest cover, healthy neighboring ecosystems such as stream and river landscapes, or agroforestry systems (see above). Even ≥30% shade can lead to a significant reduction in evaporation of 32% compared to locations with little shade. The more shade in agroforestry systems can reduce the total soil evaporation and coffee transpiration, thus offering farmers whose agriculture is threatened by reduced water resources greater protection for their crops.[36] At the same time, there should be a consistent shift to sun drying methods instead of wet washing, which consumes large amounts of water. Even though the taste of sun-dried coffee is less homogeneous than that of washed coffee, priority should be given to securing water resources for the long term and thus also ensuring the availability of coffee for the market.

Pesticides pose acute and chronic health risks to farmers and agricultural workers; Vietnam. Source: Nguyen uan/AdobeStock

6) Conclusions

There are significant environmental and human rights risks along the global coffee supply chain. Deforestation, damage to ecosystems and biodiversity, high water consumption, precarious working and income conditions, exploitation, and extreme poverty are among the key risks and abuses for which German coffee companies must take responsibility in their supply chains. With the EUDR and the CSDDD, the EU has created binding regulations to increase transparency and oblige companies to deal with these risks in a more systematic manner. Additionally, in Germany, the LkSG lays down binding regulations.

The EUDR in particular, represents an important step toward counteracting ongoing global deforestation. It is essential to prevent any further weakening of the EUDR's implementation in order to counteract deforestation for European consumption. The planned reduced implementation of the CSDDD also means that only the largest companies will have to assume responsibility. This dramatically weakens the protection of the environment and human rights, hinders transparency in supply chains, and may cause long-term competitive disadvantages for the companies that do take responsibility.

Our report shows that many German companies still have a long way to go to become sustainable, but at the same time, most of them are willing to take responsibility. Numerous companies are already implementing concrete measures for sustainability, even though the ranking reveals major differences in their performance. Alnatura, JDE Peet's, and Seeberger are the best-performing companies, scoring particularly well compared to the other companies in terms of extensive data collection, environmental information, risk analysis, and preventive measures. J.J. Darboven, Bela, and Dallmayr KG are at the bottom of the ranking with comparatively low scores in the categories of traceability, risk analysis, and preventive measures. Clear rules are needed to ensure fair competition and prevent human rights violations and environmental damage.

Although this could initially mean higher organizational and financial costs for companies, the provisions of the EUDR, CSDDD, and LkSG also open up the possibility of promoting sustainable and fair farming methods and assuming long-term responsibility for the environment, people, and the climate. Transparency and binding due diligence obligations also bring economic benefits in the long term. They increase the resilience of supply chains, reduce legal, financial, and reputational risks, and strengthen planning security for companies. Early risk analyses and preventive action can avoid delivery failures, liability cases, and costly crises. Without binding standards, however, sustainability remains a mere option, not the rule. Clear rules ensure progress, fairness, and investment.

EUDR, LkSG, and CSDDD: we need these laws if we want to eliminate serious environmental damage and human rights violations from our coffee production. Source: Anderson Piza/AdobeStock

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Deutsche Umwelthilfe

Deutsche Umwelthilfe e.V.
Headquarters Berlin
Hackescher Markt 4
10178 Berlin, Germany
Tel.: +49 30 2400867-0

Contacts

Svane Bender
Head of Department, Nature Conservation and Biological Diversity
Tel.: +49 151 70534254
E-Mail: bender@duh.de

Tina Lutz
Team Lead, International Forest Protection and Supply Chains
Tel.: +49 30 2400867-890
E-Mail: lutz@duh.de

Tabea Schiffer
Policy Advisor, Food and Land Use
Tel.: +49 30 2400867-461
E-Mail: schiffer@duh.de

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