

How are coffee sector actors preparing for the **EU Deforestation Regulation**?



Today's agenda

1.
Introduction of
research
projects

2.
(Shaping)
expectations
about EUDR
implementation

3.
Broad sectoral
preparation
patterns

4.
Field
impressions
from Côte
d'Ivoire

5.
Field
impressions
from Colombia



EXPECT-AGRI research project (2025-2030)



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→ **How do due diligence legislations shape expectations, behaviors, and sustainability outcomes?**

→ **Coffee, cocoa, palm oil** → **Colombia, Côte d'Ivoire**



UNIVERSITY
OF AMSTERDAM

Master's research



Daria Scharnhorst
Master's student

- ‘Erasing Untraceable Dynamic Realities’:**
- The making of 'deforestation-free' coffee under the EUDR
 - 4-months fieldwork
 - Huila, Colombia

The EU Deforestation Regulation

By the end of 2026...

Coffee imported into the EU market needs to be:

- **Deforestation-free**
- **Legally compliant with producing country law**

Deforestation-free = not grown on land deforested after 2020

**Legally compliant = includes environmental laws, land rights, human rights, labor rights ...
(... though possible interpretation narrows it to laws that are relevant to deforestation reduction)**

Due diligence statements, submitted by first importer, need to contain:

- **Geolocation information of producer plots of product included in shipment**
- **In most countries: information about deforestation risk assessment, mitigation measures**
- **Assurance of 'no or negligible risk' that product is non-compliant**

(Shaping) expectations about EUDR implementation



Research approach

Q interviews

Order 40 statements by level
of agreement, explanation

Brussels, Colombia,
Côte d'Ivoire

Private sector, producer reps, NGOs,
multi-stakeholder orgs, public bodies, etc. 

78 participants

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How do affected stakeholders perceive the feasibility and likely impacts of EUDR implementation?

Different types of expectations and perspectives towards the EUDR

The optimists

EUDR is a step forward for sustainability, transparency, and tackling deforestation. Disagree with critiques of the EUDR related to feasibility of its requirements, exclusionary effects on smallholders, and neocolonial tone.

The skeptics

EUDR (legality) requirements are unrealistic, compliance with EUDR is challenging, reflects a neo-colonial approach. Important implementation challenges foreseen, including cheating from companies and lack of capacity and willingness from EU Competent Authorities to enforce it. Midstream actors are “squeezed in the middle”: compliance costs will not fall on producers, guidance from the EU is insufficient, civil society & third-party certification not expected to play a crucial role.

The distributional worriers

Unequal impacts of the EUDR, especially for smallholders. Compliance costs expected to fall on producers, exclusion of smallholders from global value chains. Doubt that the regulation will empower local communities or incentivize companies to invest in long-term sustainability systems.

The pragmatists

EUDR is implementable, strongly reject claims that its legality, traceability and due diligence requirements are unrealistic but emphasize the necessary conditions for this, including sectoral specificities and support from national authorities in producing countries.

Research approach

**Analysis of ex-post
lobbying on EUDR and
arguments used by
different actors**

Qualitative data analysis

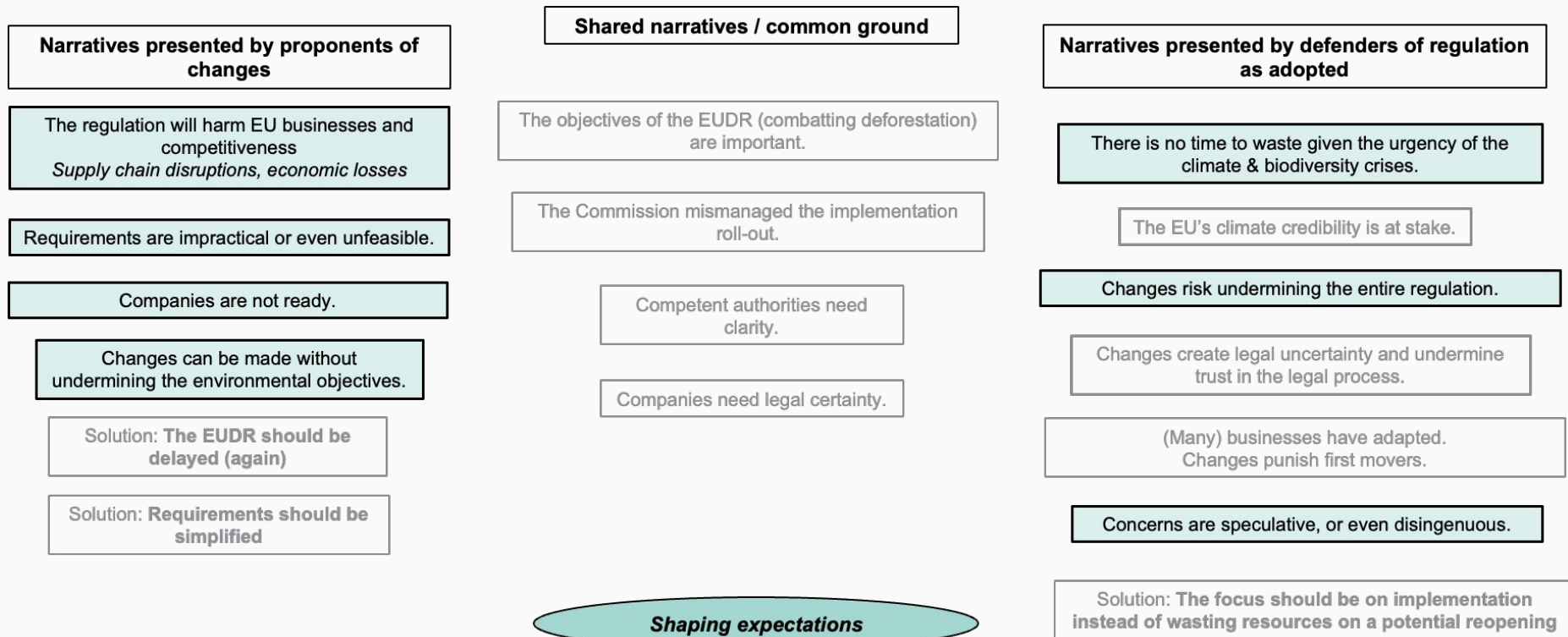
**Public consultation submissions, open letters,
press releases, all after June 2023**

**240 documents, 12
stakeholder interviews**

AIM

What arguments were used in policy discussions about EUDR implementation, and how did they frame likely future outcomes?

Ex-post lobbying highlighted disruption narrative



Broad sectoral preparation patterns

Regulation & Governance

Regulation & Governance

SPECIAL ISSUE Blurring the Lines: Entanglements of Public and Private Sustainability Regulation in the Governance of Global Value Chains

ORIGINAL ARTICLE **OPEN ACCESS**

The Construction of Compliance with the European Union Deforestation Regulation in Global Coffee Value Chains

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Received: 29 September 2024 | Revised: 29 October 2025 | Accepted: 3 November 2025

Funding: The author received no specific funding for this work.

ABSTRACT

The European Union's Deforestation Regulation (EUDR) obliges the importers and users of seven agricultural commodities to achieve supply chain traceability and prevent deforestation-linked products from entering the EU market. This paper investigates how companies and producing countries in the coffee sector prepared for EUDR compliance by analyzing 61 semi-structured expert interviews and 25 sectoral meetings. It draws on socio-legal theorization on compliance construction and Global Value Chain scholarship to show that under regulatory uncertainty, compliance preparations are shaped significantly by pre-existing value chain characteristics and power relations. Upstream, midstream, and downstream actors pursued different compliance approaches to reduce costs and improve their competitive position. While producing countries aimed to establish country-level producer databases for EUDR compliance, trading companies drew on existing capacities to build out their traceable, sustainable coffee offers. Downstream coffee sector actors, in turn, constructed a "territorial" approach to EUDR compliance that eschewed strict traceability, but were ultimately unsuccessful in lobbying for its acceptance by EU authorities. The results highlight the importance of considering value chain dynamics when designing and implementing public policy, and paying greater analytical attention to the phase of compliance preparation within the policy cycle.

Research approach

**Expert interviews from
2023-2024 with global
coffee sector actors**

Qualitative data analysis

**Business associations, development
organizations, trading companies, roasters,
service providers, government reps, etc.**

**61 stakeholder
interviews**

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What preparatory steps did coffee sector actors at different levels of the coffee value chain take to move toward EUDR compliance, and why?



Three different ways to construct compliance with the EUDR

Trader-led, supply chain

- Close to letter of the law
- Building on existing traceability systems and sustainability programs
- Race for competitive advantage in EUDR-compliant coffee

Producing-country led, national

- Country-level producer databases
- Concerns over data ownership and market exclusion
- Medium-term compliance, not ready by 2025

Roaster-led, territorial

- Aim to avoid strict traceability, trader reliance
- Focus on building deforestation-free origins
- Approach not validated by EC and abandoned in 2024

Common to all approaches

- Seeking to maintain or improve value chain position
- Prioritization: (1) mapping, (2) deforestation risk, (3) legality
- Regulatory uncertainty undermines investments
- Duplication of efforts increases costs for all

Fieldwork impressions from Côte d'Ivoire



Research approach

Longitudinal fieldwork

2026 → 4 months

2027 → 3 months

2028 → 3 months

La Mé, Cavally, Nawa, Gbôklé 

Cooperatives and farmers 

40 interviews

12 focus groups

72 farmers

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What are the local implications of the EUDR (and other mHREDD legislation) for Ivorian actors?

Main research insights

Cooperatives bear the burden of compliance

Cooperatives receive little to no financial support for GPS and polygon data collection

Asymmetric awareness

Cooperatives show some knowledge of EUDR (impact of RA certification), but it does not trickle down to farmers.
Inclusiveness?

Future of the Ivorian coffee sector

Relaunching of the coffee production: mixed results

Main local downstream actor → Nescafé

From instant coffee to specialty coffee (e.g., Café Continent)?

Fieldwork impressions from Colombia



Research approach

Longitudinal fieldwork

2026 → 3 months

2027 → 3 months

2028 → 3 months

Meta, Huila and Santander +
Bogotá 

3 departments

65 individual interviews

9 focus groups

10+ farm visits

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Understand the institutional conversation regarding EUDR and CSDDD and look at the contexts in which these legislations would be applied to

Research insights:

Construction of compliance at the institutional level

Colombia has undergone a multi-platform collaborative effort to promote EUDR as an opportunity for the country. The delay has decreased interest and efforts in the topic, questioning the EU strategy

Heterogeneity of contexts and destinations

At production origins, the final markets for Colombian coffee, palm and cocoa are particularly diversified. Also knowledge of such norms is scattered among different regions.

The informality conversation

When social norms in rural areas are rooted in informal practices, how can European legislation with limited reach change these practices in producing areas?

Master thesis research

Erasing Untraceable Dynamic Realities:
The making of 'deforestation-free' coffee under the EUDR



Research approach

Ethnographic fieldwork

4 months

Pitalito, Huila, Colombia 

Farmers, field technicians, intermediaries and exporters 

60 participants

Farms, dry-mills, warehouses, processing stations 

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Trace how coffee becomes 'deforestation-free' on the ground

Research insights:

**Ability to comply =
having verified data**

Depends on access to financial resources,
available paperwork, and ability to verify due
diligence data

**EUDR DATA ≠
Traceability**

Coffee circulates locally in different
processing stages, making real traceability
difficult.

Local realities left out

Lack of economic stability and volatility of prices.
Other contaminating practices e.g. residual waters

Main takeaways

EUDR turns into a bureaucratic demand

**Compliance is shaped by
financial resources, available infrastructures
and data**

**Local complexities and realities have to be
considered in making sustainable supply
chains**

Recommendations to companies

- (1) Enable farmer data ownership: (Accessible) data sharing with coops and associations reduces cost duplication**
- (2) Regulatory translation to farmers: Ensure key requirements are well understood**
- (3) Pass down EUDR-related incentives: Premiums for compliant supply should be shared**

Recommendations to policymakers

- (1) Pursue collaborative enforcement: Trial-and-error phase should include all actors**
- (2) Open greater space for dialogue: Competent authorities' perspectives are widely of interest**
- (3) Discourage cut-and-run approaches: Alignment with CSDDD in engagement before exclusion**
- (4) Include remediation possibilities: Give non-compliant farmers the possibility to reintegrate into the EU market**

Coming soon: **Company survey on regulatory implementation and its preconditions.**

Why participate?

1

Participants will receive aggregate interim results that they can use to compare their own preparations to their competitors'

2

Contributing to this research can help inform (better) policymaking in the future

3

All results are fully anonymous - we will not be able to trace respondents to their answers. No risk, only benefits!

Convinced? Sign up to our newsletter!



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