



20 November 2023

To:

Commissioner Jutta URPILAINEN  
 Commissioner Virginijus SINKEVICIUS  
 Minister Zakia KHATTABI

CC:

Director General Florika FINK-HOOIJER  
 Director General Koen DOENS  
 Director Peter DE KONING

**Statement: EU Deforestation Regulation implementation must be socially just**

Dear Commissioner Urpilainen, Commissioner Sinkevičius and Minister Khattabi,

We, the undersigned organisations, wish to convey our hope that the EU Regulation on deforestation-free products (EUDR) contributes effectively to halting deforestation worldwide, while also strengthening smallholders' rights and improving their livelihoods.

The geolocation requirement is an essential component of the EU law for holding operators and traders placing products on the European market accountable. Smallholders' inclusive and transformative traceability systems, which they should have input into, would allow them to own their data, as well as have direct access to a digitalised system. This will reduce supply chains' complexity and increase transparency.

It is crucial that small scale farmers have a seat at the table when traceability and compliance are discussed, as well as fundamental questions such as possible cost burdens and paying fair purchasing prices. This would allow small scale farmers - the first actors in the supply chain - to make a decent living from their work. With smallholders' participation, possible compliance challenges and needs, such as technical support, the reduction of intermediaries, need to be assessed. Adequate mitigation measures designed to avoid disengagement also need to be developed.

We also note that the EUDR requires companies operating in risky areas to adopt risk mitigation measures as part of the due diligence obligations. These may include supporting smallholders in complying with the law, notably through capacity building and investment.

Currently, however, there is a significant risk that the burden of complying with the regulation is borne by the most vulnerable actors in the supply chain. This is why we think it is of utmost importance that the EU undertakes the following actions.

The impact of the EUDR on smallholders still hasn't been assessed by the EU. We call for this to be done as swiftly as possible, at the beginning of the implementation phase and not in five years, as currently planned. Once this is carried out, the EU should assess how it can empower smallholders to overcome barriers to sustainable and legal deforestation-free production, whether through trade incentives or aid programmes, including technical, legal and financial support. Such support should be tailored to local realities and developed in consultation with smallholders.

Another urgent priority is creating spaces for multi-stakeholder dialogue between the EU and producer countries which involve the full participation of civil society organisations, smallholders, and Indigenous Peoples and local communities. Such spaces should be the foundations for setting up formal partnerships between producer countries and the EU. They should, as a matter of priority, assess how a fair price can be paid to smallholders so that they have a living income. It should be noted that small scale farmers who already have polygons, and therefore fully traceable production, also struggle with having fair prices, a situation which, for example, Indonesian farmers often face. Furthermore, several producer countries have already set up, or are considering setting up, national or public traceability systems. We believe the EU should recognise them and support their development, as long as they are inclusive of smallholders, are well-governed and guarantee the delivery of legal and deforestation-free commodities.

Finally, we also call on the EU to actively pursue initiatives to increase smallholders' direct access to the EU market, through targets or quotas, higher commodity prices, or through special platforms to market and facilitate buying from smallholders.

Yours sincerely,

The organisations listed:

*Alyansa Tigil Mina (ATM), Philippines*  
*Bina Bersama cooperatives, Indonesia*  
*BOS+, Belgium*  
*Centre d'Appui à la Gestion Durable des Forêts Tropicales, Democratic Republic of the Congo*  
*Civic Response, Ghana*  
*EcoCare, Ghana*  
*Environmental Legal Assistance Center (ELAC), Philippines*  
*Fern, EU*  
*For Greening, Cameroon*  
*Forests of the World, Denmark*  
*Fundación Gaia Amazonas, Colombia*  
*Green Development Advocates (GDA), Cameroon*  
*IDEF, Côte d'Ivoire*  
*Inades-Formation Côte d'Ivoire, Côte d'Ivoire*  
*Institute for the Development of Educational and Ecological Alternatives (IDEAS), Philippines*  
*Kaoem Telapak, Indonesia*  
*Kitanglad Integrated NGOs (KIN), Philippines*  
*Makmur Barokah Belutu cooperatives, Indonesia*  
*Mighty Earth, UK*  
*Pemasaran Ikatan Petani Sawit Swadaya cooperatives, Indonesia*  
*Petani Sawit Swadaya Tambusai Sejahtera association, Indonesia*  
*Plateforme Ivoirienne pour le Cacao Durable, Côte d'Ivoire*  
*Polish Ecological Club, Poland*  
*Produsen Karya Desa Mandiri cooperatives, Indonesia*  
*Produsen Tani Makmur Lestari Cooperatives, Indonesia*  
*Produsen Usaha Bersama Tunas Merapi Manunggal cooperatives, Indonesia*  
*Réseau Ivoirien du Commerce Equitable, Côte d'Ivoire*  
*Serba Usaha Masagene Lalla' Tassisara cooperatives, Indonesia*  
*Service d'Appui aux Initiatives Locales de Developpement (SAILD), Cameroon*  
*SOCAED COOP CA, Côte d'Ivoire*  
*Société coopérative avec conseil d'administration Global Crop Agro-Conseil, Côte d'Ivoire*  
*SCOOPS PRO2CABA, Côte d'Ivoire*  
*Solidaridad, Netherlands*  
*SPKS, Indonesia*  
*SYNAPARCAM, Cameroon*  
*Tropenbos International, Netherlands*  
*Tropical Forest and Rural Development (TF-RD), Cameroon*  
*ZERO - associação sistema terrestre sustentável, Portugal*