

April 4, 2025

LUIGI LAVAZZA SPA
Via Bologna 32,
10152, Torino, IT

Dear Lavazza,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

You mentioned that the European Coffee Federation's (ECF) letter to the EU was simply a call for further guidance. In our view, the ECF's letter, along with its additional communications and actions—as well as those of the Deutscher Kaffeeverband (GCA), of which we understand you are also a member—were intended to undermine the EUDR. For example, the letter's subject read, "a call to reconsider the implementation and timeline." The letter argued that the implementation of the EUDR could create a "shattering disruption" to the coffee industry including smallholder farmers. The letter went much further than seeking guidance or providing suggestions for constructive solutions on perceived challenges in implementation.

However, we are happy to learn that Lavazza's position would have been only to support a call for further guidance on the EUDR, rather than calls for delays to and major watering down of the EUDR.

Next, Coffee Watch disagrees with the false dichotomy regarding the EUDR's impact on smallholder farmers underpinning the ECF's letter to which you refer. The ECF's response exploits the struggle of smallholder farmers as a smokescreen to dismantle vital regulations—regulations that do not even apply to the farmers but to corporations importing coffee to Europe. With their immense power and resources, companies could easily assist smallholder farmers to come into compliance with the EUDR. It is not right to create or contribute to hardships smallholders face (by excluding them rather than working with them to get into compliance) and then to weaponize those very same hardships to undermine the EUDR.

The options are not (1) to comply with the EUDR in its current manifestation and alienate the poorest smallholder farmers from the EU market or (2) to undermine the EUDR and keep smallholder farmers engaged in the EU Market.

There is a much better third option that allows for robust regulation in coffee and for smallholder coffee producers to thrive. Coffee Watch urges coffee company members of the ECF to enable smallholder compliance with the EUDR by paying smallholders a living income, investing in long-term contracts, targeted investments, supporting smallholders to legalize their tenure and user rights, increasing the number of smallholders in their supply chains, and providing technical and financial support to build the capacity of smallholder organizations to collect and manage the required data. In our view, the third option is the only viable option to ensure the sustainability of the coffee industry. For more information, consult the following resources from FERN:

- [Recommendations for a smallholder-inclusive EU Regulation on deforestation-free products](#)
- [Indonesian palm oil smallholders and the EUDR: Impacts and ways forward](#)
- [EU Deforestation Regulation: smallholders hope that help is on its way](#)

Regulations in importing countries can have a profound impact on the lives of workers in producing countries. For example, the mere existence of the Lieferkettengesetz in Germany has led to [great achievements for garment workers in Pakistan](#). Since the law has come into application, workers' unions in Pakistan have for the first time in 40 years been able to meet with fashion brands based in Germany to discuss labor rights violations in factories. In one case, one of the fashion brands signed a memorandum of understanding with one of the factories to require them to implement minimum standards for workers. As a result, workers were provided with a minimum wage, formal contracts, bonuses, and training on labor laws. Please let us know if you would like more guidance on how compliance with the EUDR is already working in practice, and how it can be made ever more positively impactful.

More importantly however, Coffee Watch commends Lavazza's compliance efforts you mentioned, as we commend any company that takes genuine steps to comply with the EUDR. These efforts demonstrate leadership and set an important example, proving to the industry that responsible, deforestation-free supply chains are both achievable and necessary. Companies that prioritize compliance show that meeting these standards is not only possible but also essential for the future of ethical and sustainable coffee production.

We are thrilled that Lavazza *"is committed to ensure compliance with the upcoming due-diligence requirements under the EUDR, within the deadline set by the legislator."* It is encouraging to read Lavazza's statement that it has engaged experts to assist them in complying with the EUDR and to verify that Lavazza products do not contribute to deforestation and forest degradation. Further, we commend Lavazza for taking steps to build *"its own due diligence system, based on deforestation and legality checks...aligned to the objective of the EU Regulation on deforestation-free products."*

It will be our pleasure to transmit this information to Members of the European Parliament MEPs) and other relevant authorities (particularly as this statement is quite divergent from the position taken by the European Coffee Federation and the German Coffee Association (GCA) of which you are a member). It will no doubt be a relief to many European authorities to understand that coffee

industry lobby groups, which undertook harmful lobbying to derail, water down, and delay the EUDR, are not always representative of their members' positions.

We urge Lavazza to lead by example and tell the European Coffee Federation and the German Coffee Association to stop any future harmful lobbying against the EUDR.

If Lavazza is truly committed to ending deforestation, it should ensure that no entity of which it is engaged, such as the European Coffee Federation and the German Coffee Association, conducts negative lobbying to destroy the EUDR going forward. Moreover, Lavazza should distance itself from the previously published materials by coffee industry lobbyists. To counter the pressure that lobby groups such as the ECF and GCA, have been exercising on all EU policy makers, we urge you to write to all MEPs, to the European Commission, and to the national governments of EU Member States to explain the following:

- That Lavazza is committed to ensure compliance with the upcoming due-diligence requirements under the EUDR.
- That you involved a dedicated team of experts to create the adequate process and procedure to ensure such compliance as well as availability of our products on the market.
- That you verify that none of Lavazza's product contribute to deforestation and forest degradation, in accordance with EUDR, Lavazza is building its own due diligence system, based on deforestation and legality checks.
- That Lavazza Group is aligned to the objective of the EU Regulation on deforestation-free products and will continue to engage with policy makers, civil society and industry professionals in view of achieving a sustainable coffee supply chain from bean to cup.

With our repeated thanks for your clarifications and your support for EUDR compliance, sincerely,



Etelle Higonnet
COFFEE WATCH

April 3, 2025

Lena Schweighöfer
Manager Coffee Sustainability
Tchibo (part of Maxingvest)
Tchibo GmbH
Überseering 18
22297 Hamburg

Dear Ms. Schweighöfer,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Tchibo states that letters from the European Coffee Federation (ECF) and the German Coffee Association (GCA) described challenges companies and smallholder farmers faced in complying with the EUDR. However, the ECF and GCA letters and other lobby actions undertaken by them went far further than describing challenges.

Our EUDR report revealed that coffee lobby groups of which Tchibo is a member, such as the ECF and the GCA, actively worked to weaken, derail, and delay the regulation—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements. This pattern of lobbying came very close to undermining the EUDR and hamstringing genuine progress in addressing deforestation and protecting human rights.

Is Tchibo's position that you support the EUDR with the sole caveat that you fear EUDR requirements will exclude farmers who have not deforested but who can't provide the data? If so, may we suggest the following resources for EUDR compliance in general and in coffee, who are able to assist farmers and supplier companies to prove that they have not deforested: [Meridia](#), [Satelligence](#), [Earthworm](#), [IDH](#) to name but a few of the most famous. Should you wish for more resources, please let us know.

We urge Tchibo to consider how, rather than reducing requirements under the EUDR, it can best support smallholder farmers in its supply chains to come into compliance with the EUDR. Rather than supporting lobbying for a less robust EUDR, Tchibo should work with the farmers in your supply chain to ensure that they are not deforesting, and that they can provide the data. Ways for a company like Tchibo to assist smallholders in complying with the EUDR have been mapped out by

expert groups like Fern, and include: paying smallholders a living income, investing in long-term contracts, targeted investments, supporting smallholders to legalize their tenure and user rights, increasing the number of smallholders in their supply chains, and providing technical and financial support to build the capacity of smallholder organizations to collect and manage the required data. For more information, consult the following resources from FERN:

- [Recommendations for a smallholder-inclusive EU Regulation on deforestation-free products](#)
- [Indonesian palm oil smallholders and the EUDR: Impacts and ways forward](#)
- [EU Deforestation Regulation: smallholders hope that help is on its way](#)

We commend Tchibo for its efforts in reforestation. This is an important part of the coffee industry's responsibility. As we know, coffee is the sixth largest driver of deforestation in the world. Today, the sustainability of the coffee industry is under threat due to decades of deforestation which have affected microclimates in coffee growing areas and caused adverse weather events that threaten all farming - including coffee cultivation - and land suitable for coffee. Such a threat demands immediate and drastic action to fully shift coffee production to regenerative agroforestry systems. We would welcome a commitment from Tchibo to sourcing 100% of its coffee from regenerative agroforestry farms.

But more to the point, we would welcome a precise clarification from Tchibo: is the company ready for compliance with the EUDR, and does Tchibo support the EUDR as it currently stands, or with minor adjustments?

Sincerely,



Etelle Higonnet
COFFEE WATCH

April 4, 2025

Dr. Sarah Tischer and Carolin Ehrensperger
Head of Group Compliance & Group Sustainability (Co-lead) and
Head of Group Sustainability (Co-lead)
Neumann Gruppe GmbH
Coffee Plaza, Am Sandtorpark 4
20457 Hamburg, Germany

Dear Dr. Sarah Tischer and Carolin Ehrensperger,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Coffee Watch commends your efforts to get into compliance with the EUDR in advance of the application of the Regulation. We are thrilled to hear that Neumann Kaffee Gruppe (NKG) is well-positioned and ready to comply with the EUDR.

However, NKG's compliance actions and statements as a company per se were never at issue in our paper. Rather, our paper focused on negative lobbying efforts by coffee *groups* of which NKG is a member, such as the European Coffee Federation (ECF) and the German Coffee Association (GCA). These groups actively worked to weaken, derail, and delay the regulation—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements or adjust the law to make it more impactful and more positive for smallholders. This pattern of lobbying came very close to undermining the EUDR and hamstringing genuine progress in addressing deforestation and protecting human rights. While we understand that it is entirely possible NKG was unaware of ECF and GCA lobbying, we must underscore that *membership* in lobby groups is what was at stake in our paper.

Though we thank you for sharing your thoughts with us, Coffee Watch disagrees with the false dichotomy underpinning your response regarding the EUDR's impact on smallholder farmers. NKG's response exploits the struggle of smallholder farmers as a smokescreen to dismantle vital regulations—regulations that do not apply to the farmers but to corporations importing coffee to Europe. With their immense power and resources, companies could easily assist smallholder farmers to come into compliance with the EUDR. It is not right to create or contribute to hardships smallholders face (by excluding them rather than working with them to get into compliance) and then to weaponize those very same hardships to undermine the EUDR.

The options are not (1) to comply with the EUDR in its current manifestation and alienate the poorest smallholder farmers from the EU market or (2) to undermine the EUDR and keep smallholder farmers engaged in the EU Market.

There is a much better third option that allows for robust regulation in coffee and for smallholder coffee producers to thrive. Coffee Watch urges coffee companies to enable smallholder compliance with the EUDR by paying smallholders a living income, investing in long-term contracts, targeted investments, supporting smallholders to legalize their tenure and user rights, increasing the number of smallholders in their supply chains, and providing technical and financial support to build the capacity of smallholder organizations to collect and manage the required data. The third option is the best and most viable option to ensure sustainability of the coffee industry. Companies should not choose abusive disengagement with smallholders as an “easy” risk-mitigation measure. For more information regarding how the EUDR can and should be smallholder inclusive (including for coffee), you may like to consult the following resources from FERN:

- [Recommendations for a smallholder-inclusive EU Regulation on deforestation-free products](#)
- [Indonesian palm oil smallholders and the EUDR: Impacts and ways forward](#)
- [EU Deforestation Regulation: smallholders hope that help is on its way](#)

In any event, we were thrilled to read that NKG “*will continue to work towards being able to import EUDR-aligned coffee into the EU as quickly as possible.*” We are encouraged to read that NKG is “*further improving and sharpening [their] EUDR approach and prepar[ing] [their] operations and supply chains to meet demands for EUDR-aligned coffee.*”

It is wonderful that NKG supports the regulation and is getting ready for EUDR compliance - it will be our pleasure to transmit this information to Members of the European Parliament (MEPs) and other relevant authorities. Particularly as this statement is quite divergent from the position taken by the ECF and the GCA. To counter the pressure that lobby groups, of which you are a member, have been exercising on all EU policy makers, we urge you to write to all MEPs, to the European Commission, and to the national governments of EU Member States to express your support. It will no doubt be a relief to many European authorities to understand that the industry lobby groups, which undertook harmful lobbying to derail/water down/delay the EUDR, are not representative of their members’ positions.

This pattern of lobbying undermines genuine progress in addressing deforestation and protecting the rights of communities affected by it. If NKG is truly committed to ending deforestation and to supporting the EUDR, it should oppose any lobby groups attempting to delay or dilute crucial regulations, where it is a member.

Sincerely,



Etelle Higonnet
COFFEE WATCH

April 3, 2025

Olam Group
7 Straits View
Marina One East Tower
Marina South
Singapore

Dear Olam,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Coffee Watch commends efforts to get into compliance with the EUDR in advance of the application of the Regulation. We are thrilled to hear that Olam is well-positioned and ready to comply with the EUDR.

However, Olam's compliance actions and statements as a company per se were never at issue in our paper. Rather, our paper focused on negative lobbying efforts by coffee *groups* of which Olam is a member, such as the European Coffee Federation. The ECF and Deutscher Kaffeeverband (GCA) actively worked to weaken, derail, and delay the regulation—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements or adjust the law to make it more impactful and more positive for smallholders. This pattern of lobbying came very close to undermining the EUDR and hamstringing genuine progress in addressing deforestation and protecting human rights. While we understand that it is entirely possible Olam was unaware of ECF and GCA lobbying, we must underscore that *membership* in lobby groups is what was at stake in our paper.

In any event, we were thrilled to read that Olam is "*well-positioned to provide the required due diligence and traceability obligations for our coffee and cocoa products destined for the EU market.*" We were also encouraged to read that Olam will have no problem complying with the EUDR as your "*existing traceability and information systems already provide much of the data required for compliance and have been enhanced to ensure EUDR readiness, including traceability to individually mapped farms.*"

It is wonderful that your company not only supports the regulation but is ready to comply - it will be our pleasure to transmit this information to Members of the European Parliament (MEPs) and other relevant authorities (particularly as this statement is quite divergent from the position taken by the ECF and GCA). To counter the pressure that lobby groups, of which you are a member, have been exercising on all EU policy makers, we urge you to write to all MEPs, to the European Commission, and to the national governments of EU Member States to express your support. It will no doubt be a relief to many European authorities to understand that the industry lobby groups, which undertook harmful lobbying to derail/water down/delay the EUDR, are not representative of their members' positions.

This pattern of lobbying undermines genuine progress in addressing deforestation and protecting the rights of communities affected by it. If Olam is truly committed to ending deforestation and to supporting the EUDR, it should oppose any lobby groups attempting to delay or dilute crucial regulations.

Sincerely,



Etelle Higonnet
COFFEE WATCH

Etele Higonnet

Director

Coffee Watch

etelle.higonnet@coffeewatch.org

April 3, 2025

Stefan Dierks
Director Sustainability Strategy
Melitta Group Management
Postfach 1126, 32371 Minden
Tel. 0571/4046-0,

Dear Mr. Dierks,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Coffee Watch commends efforts to comply with the EUDR and to take a practical approach to getting in compliance with the EUDR through the use of various tools.

We gather from your response that Melitta relies on the German Coffee Association's (GCA) statement regarding its EUDR lobbying efforts. The German Coffee Association engaged in repeated efforts to undermine, derail, water down, and delay the EUDR.

In response to the GCA's statement that the collection of relevant data for EUDR is burdensome for the coffee industry, as explained in our paper, there is no added complexity in the coffee sector than in any other sector covered by the EUDR. Cocoa, rubber, and palm oil are all regulated by the EUDR, and they all rely on smallholders. Yet, rather than engaging in repeated organized attacks against the EUDR, numerous companies in those sectors [expressed](#) their willingness and ability to comply.

In any event, we are happy to read Melitta's statement: "We firmly believe that the one-year postponement of the EUDR will facilitate a smoother and more effective implementation, ensuring broader inclusion of coffee-producing countries into the European market." Is that now Melitta's position on the EUDR? If so, we are thrilled that Melitta has evolved to strongly support the regulation - it will be our pleasure to transmit this information to Members of the European Parliament and other relevant authorities.

To counter the pressure that lobby groups, such as the GCA, have been exercising on all EU policy makers, we urge you to write to all Members of the European Parliament, to the European Commission, and to the national governments of EU Member States to declare your support.

We hope that Melitta (and all other members of the German Coffee Association) will be able to constructively use this additional year to assist smallholders in their compliance journey, including by: paying smallholders a living income, investing in long-term contracts, targeted investments, supporting smallholders to legalize their tenure and user rights, increasing the number of smallholders in their supply chains, and providing technical and financial support to build the capacity of smallholder organizations to collect and manage the required data. For more information, you may like to consult the following resources from FERN:

- [Recommendations for a smallholder-inclusive EU Regulation on deforestation-free products](#)
- [Indonesian palm oil smallholders and the EUDR: Impacts and ways forward](#)
- [EU Deforestation Regulation: smallholders hope that help is on its way](#)

We hope that rather than looking at smallholders' compliance challenges with an eye to undermining the EUDR, all coffee companies such as Melitta will present their plans for investment in smallholder farmers' capacity to comply with the EUDR, in a way that makes the regulation beneficial to farmers and forests alike.

With our repeated thanks for your clarifications and your support for EUDR compliance, sincerely,



Etelle Higonnet
COFFEE WATCH

April 3, 2025

Nestlé
Avenue Nestlé 55
1800 Vevey
Switzerland

Dear Nestlé,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Coffee Watch commends Nestlé for its consistent public support of the EUDR. In particular, in the cocoa sector, Nestlé has been a real champion for the EUDR.

That championship was never at issue. Rather, our paper focused on negative lobbying efforts by coffee groups of which Nestlé is a member, such as the European Coffee Federation (ECF). Despite Nestlé's public support for the EUDR, the ECF and Deutscher Kaffeeverband (GCA) actively worked to weaken, derail, and delay the regulation—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements. This pattern of lobbying came very close to undermining the EUDR and hamstringing genuine progress in addressing deforestation and protecting human rights. While we understand that it is entirely possible Nestlé was unaware of ECF and GCA lobbying, we must underscore that a big part of their credibility comes from Nestlé being a member (as the most important company in coffee).

While it is extremely welcome that Nestlé states it has "never called for any delay of the EUDR and [has] always opposed any calls to reopen the substance of the EUDR for new negotiations," Coffee Watch asks Nestlé to ensure that the coffee industry groups of which it is a member represent Nestlé's positions instead of advocating for the reverse, and even possibly - it seems - implying a misrepresentation of Nestlé's positions.

In any event, we are thrilled that Nestlé "strongly support[s] the objective of the European Commission to protect the world's forests and restore forests in a sustainable way." It will be our pleasure to transmit this information to Members of the European Parliament (MEPs) and other relevant authorities (particularly as this statement is quite divergent from the position taken by the European Coffee Federation of which you are a member). It will no doubt be a relief to many

European authorities to understand that coffee industry lobby groups' lobbying to derail, water down, or delay the EUDR, were not representative of their members' positions.

We urge Nestlé to lead by example and tell the European Coffee Federation and other coffee lobby groups of which Nestlé is a member, to stop any future harmful lobbying against the EUDR.

Sincerely,



Etelle Higonnet

COFFEE WATCH

April 4, 2025

Dr. Johannes Dengler,
Alois Dallmayr KG
Dienerstrasse 14-15, 80331
München

Dear Dr. Johannes Dengler,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Though we thank you for sharing your thoughts with us, Coffee Watch disagrees with the false dichotomy underpinning your response regarding the EUDR's impact on smallholder farmers. Dallmayr's response exploits the struggle of smallholder farmers as a smokescreen to dismantle vital regulations—regulations that do not apply to the farmers but to corporations importing coffee to Europe. With their immense power and resources, companies could easily assist smallholder farmers to come into compliance with the EUDR. It is not right to create or contribute to hardships smallholders face (by excluding them rather than working with them to get into compliance) and then to weaponize those very same hardships to undermine the EUDR.

The options are not (1) to comply with the EUDR in its current manifestation and alienate the poorest smallholder farmers from the EU market or (2) to undermine the EUDR and keep smallholder farmers engaged in the EU Market.

There is a much better third option that allows for robust regulation in coffee and for smallholder coffee producers to thrive. Coffee Watch urges coffee companies to enable smallholder compliance with the EUDR by paying smallholders a living income, investing in long-term contracts, targeted investments, supporting smallholders to legalize their tenure and user rights, increasing the number of smallholders in their supply chains, and providing technical and financial support to build the capacity of smallholder organizations to collect and manage the required data. The third option is the best and most viable option to ensure sustainability of the coffee industry. Companies should not choose abusive disengagement with smallholders as an "easy" risk-mitigation measure. For more information regarding how the EUDR can and should be smallholder inclusive (including for coffee), you may like to consult the following resources from FERN:

- [Recommendations for a smallholder-inclusive EU Regulation on deforestation-free products](#)
- [Indonesian palm oil smallholders and the EUDR: Impacts and ways forward](#)
- [EU Deforestation Regulation: smallholders hope that help is on its way](#)

In response to your position that the number of smallholder farmers in coffee makes compliance too complex, we reiterate a point flagged in our EUDR paper, namely that there are no unique challenges due to the dominance of smallholder farmers in coffee. The estimated 60% of coffee produced by smallholders is far less than that in cocoa (95%) or natural rubber (85%), and the overall volume of smallholder-produced coffee is also smaller than that for palm oil and natural rubber, meaning that the challenges of smallholder sustainability apply to a smaller proportion of coffee imports than is the case in some other deforestation-risk commodities. If the palm oil, cocoa, and rubber industries are able to comply with the EUDR – as many in these sectors have repeatedly [stated](#) they are, despite being heavily reliant on smallholders – then coffee should be ready as well.

You mention that Ethiopia’s highly fragmented coffee sector smallholders operate on tiny plots, making it difficult to track the coffee back to the original plot - but cocoa smallholders in Ghana as well as other countries such as the Ivory Coast, Cameroon, Nigeria, and beyond are also highly fragmented and operating on tiny plots, yet the cocoa industry is (1) getting on with compliance (2) not lobbying to destroy the EUDR and (3) working effectively with producer governments to ensure large scale EUDR compliance.

You mention high costs associated with EUDR compliance. Yet a report published on February 13, 2025 by Profundo entitled “[Analysis of EUDR compliance costs](#)” indicates that the costs of EUDR compliance are likely on average 0.10% as percentage of annual revenues for large companies and SMEs. The report clarifies that if companies were to pass on the costs in their supply chains, the impact on consumer price would be between 0.001% and 0.07%. To date, we are not aware of any organization or company that has rebutted these numbers in any credible way. Can you provide evidence to prove that the costs associated with EUDR compliance are indeed higher than the Profundo report estimates?

You mention that Ethiopian Arabica coffee is grown mostly under shade, in agroforestry systems, and in some instances, collected from local communities in the natural forests. Agroforestry is indeed wonderful. But your points do not negate the very real threat that coffee has posed (and could yet pose in the future) to Ethiopian forests. Ethiopia has been undergoing significant tree cover loss in the last century, at least a significant proportion of which is for coffee. At least in part as a result of deforestation, the country is now facing rainfall anomalies, [droughts](#), and crop failures. [Global Forest Watch](#) reports that from 2001 to 2023, Ethiopia lost 504 ha of tree cover, equivalent to a 4.2% decrease in tree cover since 2000, and 244 Mt of CO₂e emissions. Going back in time, it is [thought](#) that Ethiopia’s forests declined from 35% of total land cover 100 years ago to less than 4% today. So long as deforestation continues to occur in Ethiopia, adverse weather conditions that directly affect coffee cultivation are likely to worsen.

Coffee is the sixth largest driver of deforestation in the world. This is a serious matter and requires immediate, urgent, effective attention, including regulatory reforms, since voluntary efforts have thus far proven ineffective in turning the tide against tree cover loss at scale.

In response to what you describe as the superfluous multiple controls of the regulation, the lobbying by coffee groups, of which you are a member, did not emphasize that the coffee industry would welcome the EUDR if it were altered to “assess the compliance of raw materials with deforestation once: when they are imported into the EU market.” Is that in fact Dallmayr’s position? That if this point were addressed, Dallmayr would welcome the EUDR? This would be a welcome development, which Coffee Watch would applaud.

We argue there is no special supply chain complexity for coffee. Other commodities can comply – so why not coffee? Unlike many commodities, a large proportion of coffee imports are in a single form and have only undergone primary processing. This contrasts with commodities such as palm oil and soy, where primary processing results in several separate products; and with leather and natural rubber and a proportion of palm oil and soy imports that have undergone several stages of processing prior to import. In addition, the number of imported products containing coffee is relatively small, compared with soy and palm oil, which are embedded in thousands of products. Again, on this front as with the aforementioned points, it should be easier – not harder – for coffee to comply with the EUDR.

A robust EUDR will ultimately serve the interests of smallholder farmers in Ethiopia and elsewhere who live in poverty and whose forests are being destroyed, particularly if companies like yours put smallholder wellbeing at the heart of EUDR compliance, as we hope you will. Deforestation drives rainfall anomalies and crop failures as well as other conditions that are unsustainable for smallholders and will ultimately result in less coffee and less money for the industry. Serving the interests of smallholder farmers will pay dividends for the long-term viability of the EU coffee industry.

Sincerely,



Etelle Higonnet
COFFEE WATCH

April 3, 2025

4C Services GmbH
Hohenzollernring 72
50672 Köln, Germany
info@4c-services.org

Dear 4C,

Re: Rejoinder to response, via the Business and Human Rights Resource Center, to Coffee Watch paper “Get Deforestation Out of Europe’s Coffee: The coffee industry must race to get in compliance with the EUDR.”

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper “Get Deforestation Out of Europe’s Coffee: The coffee industry must race to get in compliance with the EUDR.”

Coffee Watch commends any and every effort made by companies and certifications to promote compliance with the EUDR in advance of the application of the Regulation coming into effect.

However, 4C’s response fails to address the thrust of our report - that the German Coffee Association (of which 4C is a member) and other groups such as the European Coffee Federation (which includes companies certified by 4C) engaged in deleterious lobbying efforts to undermine the EUDR.

Our research revealed that companies actively worked to weaken the regulation by making unsubstantiated excuses—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements and work collaboratively with lawmakers and others to ensure adequate resources were made available for large scale, rapid, farmer-centric compliance efforts that would help and not hinder smallholder wellbeing, whilst achieving major sustainability milestones.

Coffee is the sixth largest driver of deforestation in the world. This is a serious matter and requires immediate, urgent, effective attention, including regulatory reforms, since voluntary efforts have thus far proven ineffective in turning the tide against tree cover loss at scale.

If 4C is truly committed to ending deforestation, it must ensure that any organization it's involved with—like the German Coffee Association or the European Coffee Federation—stops lobbying against the EUDR and works to uphold its goals instead. Moreover, 4C should distance itself from the previously published materials by coffee industry lobbyists. To counter the pressure that lobby groups that you are involved with have been exercising on all EU policy makers, we urge you to write to all Ministers of European Parliament, to the European Commission, and to the national governments of EU Member States to explain the following:

- How 4C (1) prevents deforestation, (2) prevents forest degradation, (3) prevents conversion from agroforestry to monoculture systems (4) protects forests and high conservation value areas (5) and engages in forest restoration and/or shifts from monoculture to agroforestry;
- That 4C is aligned with the EUDR;
- That 4C proactively developed EUDR compliance solutions;
- How 4C ensured most of its users have already integrated EUDR aligned practices well ahead of compliance deadline; and,
- That 4C does not oppose the EUDR (irrespective of what any lobby groups may have argued/stated) and opposes any future attempts to delay or dilute crucial regulations.

Sincerely,



Etelle Higonnet
COFFEE WATCH

April 3, 2025

Louis Dreyfus Company
Westblaak 92
3012 KM
Rotterdam
Netherlands

Dear Louis Dreyfus Company,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Coffee Watch commends your efforts to get into compliance with the EUDR in advance of the application of the Regulation. We are thrilled to hear that Louis Dreyfus Company (LDC) is well-positioned and ready to comply with the EUDR.

However, LDC's compliance actions and statements as a company per se were never at issue in our paper. Rather, our paper focused on negative lobbying efforts by coffee *groups* of which LDC is a member, such as the European Coffee Federation (ECF). The ECF and Deutscher Kaffeeverband (GCA) actively worked to weaken, derail, and delay the regulation—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements or adjust the law to make it more impactful and more positive for smallholders. This pattern of lobbying came very close to undermining the EUDR and hamstringing genuine progress in addressing deforestation and protecting human rights. While we understand that it is entirely possible LDC was unaware of ECF and GCA lobbying, we must underscore that *membership* in lobby groups is what was at stake in our paper.

In any event, we were thrilled to read that Louis Dreyfus Company "*continues its efforts to proactively prepare for compliance, including by engaging with and supporting our suppliers (especially smallholder producers) to address practical challenges associated with implementation.*" It is also wonderful that LDC "*is supportive of a swift introduction of the regulation*" and that LDC already carries "*deforestation and conversion due diligence.*" It is encouraging to read that LDC supports its suppliers to meet environmental and social requirements in its own codes and policies.

It is wonderful that LDC supports the regulation - it will be our pleasure to transmit this information to Members of the European Parliament (MEPs) and other relevant authorities. Particularly as this

statement is quite divergent from the position taken by the ECF. To counter the pressure that lobby groups, of which you are a member, have been exercising on all EU policy makers, we urge you to write to all MEPs, to the European Commission, and to the national governments of EU Member States to express your support. It will no doubt be a relief to many European authorities to understand that the industry coffee lobby groups, which undertook harmful lobbying to derail/water down/delay the EUDR, are not representative of their members' positions.

This pattern of lobbying undermines genuine progress in addressing deforestation and protecting the rights of communities affected by it. If LDC is truly committed to ending deforestation and to supporting the EUDR, it should oppose any lobby groups attempting to delay or dilute crucial regulations, where it is a member.

Sincerely,



Etelle Higonnet
COFFEE WATCH

April 3, 2025

JDE Peet's N.V.
Oosterdoksstraat 80
1011 DK Amsterdam
The Netherlands

Dear JDE Peet's N.V.,

Re: Rejoinder to response to Coffee Watch paper, "Get Deforestation Out of Europe's Coffee: the coffee industry must race to comply with the EUDR"

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper "Get Deforestation Out of Europe's Coffee: The coffee industry must race to get in compliance with the EUDR."

Coffee Watch commends your efforts to get into compliance with the EUDR in advance of the application of the Regulation. We also commend your commitment to dialogue and cooperation, which are important.

JDE's compliance actions and statements as a company per se were never at issue in our paper. Rather, our paper focused on negative lobbying efforts by coffee *groups* of which JDE is a member, such as the European Coffee Federation. The ECF and Deutscher Kaffeeverband (GCA) actively worked to weaken, derail, and delay the regulation—arguing that compliance is too complex, costly, or premature—rather than engaging in meaningful efforts to meet its requirements or adjust the law to make it more impactful and more positive for smallholders. This pattern of lobbying came very close to undermining the EUDR and hamstringing genuine progress in addressing deforestation and protecting human rights. While we understand that it is entirely possible JDE was unaware of ECF and GCA lobbying, we must underscore that *membership* in lobby groups is what was at stake in our paper.

In any event, we were thrilled to read that Jacobs Douwe Egbert is "taking steps not only to be compliant, but also to address the underlying problems that the legislation tries to address: global deforestation, biodiversity loss and climate impact, which threaten the future of the coffee industry." It is encouraging to read that you "work with smallholder farmers in more than 60 active projects in 23 countries to continuously improve sustainable and regenerative farming practices, farmer livelihoods and labour practices." This is tremendously welcome.

It is wonderful that your company so strongly supports the regulation - it will be our pleasure to transmit this information to Members of the European Parliament (MEPs) and other relevant authorities (particularly as this statement is quite divergent from the position taken by the ECF and

GCA). Additionally, to counter the pressure that lobby groups have been exercising on all EU policy makers, we urge you to write to all MEPs, to the European Commission, and to the national governments of EU Member States to express your support. It will no doubt be a relief to many European authorities to understand that the industry lobby groups, which undertook harmful lobbying to derail/water down/delay the EUDR, are not representative of their members.

We note also that the industry groups' pattern of lobbying risked undermining the EUDR and with it, genuine global progress in addressing deforestation and protecting human rights. If Jacobs Douwe Egberts is truly committed to ending deforestation and to supporting the EUDR, it should oppose any lobby groups attempting to delay or dilute crucial regulations, where it is a member. We urge JDE to lead by example and tell the ECF and the GCA to stop any future harmful lobbying against the EUDR.

Sincerely,



Etelle Higonnet

COFFEE WATCH

April 3, 2025

David Brussa
Chief Total Quality & Sustainability Officer
Illycaffè Spa
Via Flavia 110, 34147
Trieste – Italy

Dear Mr. Brussa,

Re: Rejoinder to response to Coffee Watch paper, “Get Deforestation Out of Europe’s Coffee: the coffee industry must race to comply with the EUDR”

We acknowledge your response, via the Business and Human Rights Resource Center, to our paper “Get Deforestation Out of Europe’s Coffee: The coffee industry must race to get in compliance with the EUDR.”

Coffee Watch commends any company that takes genuine steps to comply with the EUDR. These efforts demonstrate leadership and set an important example, proving to the industry that responsible, deforestation-free supply chains are both achievable and necessary. Companies that prioritize compliance show that meeting these standards is not only possible but also essential for the future of ethical and sustainable coffee production.

It is commendable that illycaffè is committed to traceability, reciprocity, and economic/social/environmental sustainability. We are particularly thrilled to read that illycaffè remains “*committed to meeting all regulatory requirements and ensuring the sustainability and transparency of our sourcing practices.*” Is that now illycaffè’s position on the EUDR? If so, we are thrilled that illycaffè has evolved to so strongly support the regulation - it will be our pleasure to transmit this information to Members of the European Parliament (MEP) and other relevant authorities (particularly as this statement is quite divergent from the position taken by the European Coffee Federation of which you are a member). It will no doubt be a relief to many European authorities to understand that the industry lobby groups, which undertook harmful lobbying to derail and water down the EUDR, are not always representative of their members’ positions.

We would urge illycaffè to lead by example and tell the European Coffee Federation to stop any future harmful lobbying against the EUDR.

If illycaffè is truly committed to ending deforestation, it should ensure that no entity of which it is a member, such as the European Coffee Federation, conducts negative lobbying to destroy the EUDR going forward. Moreover, illycaffè should distance itself from the previously published

materials by coffee industry lobbyists. To counter the pressure that lobby groups, such as the ECF, have been exercising on all EU policy makers, we urge you to write to all MEPs, to the European Commission, and to the national governments of EU Member States to explain the following:

- How illycaffè (1) prevents deforestation, (2) prevents forest degradation, (3) prevents conversion from agroforestry to monoculture systems (4) protects forests and high conservation value areas (5) and engages in forest restoration and/or shifts from monoculture to agroforestry;
- That illycaffè is aligned with the EUDR;
- That illycaffè proactively developed EUDR compliance solutions;
- How illycaffè has already integrated EUDR aligned practices well ahead of compliance deadline; and,
- That illycaffè does not oppose the EUDR (irrespective of what any lobby groups may have argued/stated) and opposes any future attempts to delay or dilute crucial regulations.

With our repeated thanks for your clarifications and your support for EUDR compliance, sincerely,



Etelle Higonnet
COFFEE WATCH