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**Invitation for Members' input on the EU
Deforestation Regulation to exchange
with European institutions**

1. The Executive Director would like to inform Members that, as previously communicated, the European Commission has undertaken a simplification review of the EU Deforestation Regulation (EUDR) (document [32025R2650](#)), following the European Council's decision of December 2025 (document [PE-CONS 60/25](#)). On 4 May 2026, the European Commission published a [new package of documents](#) related to the implementation of the Regulation, as the result of this simplification process.

2. Over recent years, Members of the International Coffee Organization (ICO) have gained important experience in supporting inclusive EUDR implementation. In this context, **the Executive Director wishes to share the summary below** of some points discussed by the ICO Secretariat with the European Commission's Directorate-General for Environment (DG ENV) and EU Member States' Competent Authorities. These points are based on ongoing exchanges and learning sessions with the participation and inputs of ICO Members. They focus on issues not yet addressed in existing or newly published EUDR documents, as opportunities remain to continue informing the process and the dialogue. **Any additional inputs, clarifications, or nuances that Members may wish to provide will be duly taken into account** as the ICO Secretariat continues its engagement with European institutions:

- (a) Public-private cooperation remains essential for inclusive EUDR implementation. Producing countries and stakeholders have invested substantially in databases of georeferenced coffee plots and legality systems. The ICO Secretariat continues to stress the importance of formally recognizing national and sub-national systems

that can support private sector due diligence while ensuring the inclusivity of producing countries and origins. The Secretariat welcomes the Commission's references to national databases ([COM\(2026\) 191](#), pages 16 and 17) and encourages the formal recognition of producing countries' systems.

- (b) The ICO Secretariat welcomes the European Commission's decision to establish repositories of producing countries' relevant legislation ([C\(2026\) 3056](#), page 18) and certification schemes ([C\(2026\) 3056](#), page 30). The Organization continues working with interested Members and partners on national legality tools and related digital hosting space. The Secretariat stresses the importance of public-private governance of such repositories to ensure trust, accuracy and regular updates, and the need to build on national multi-stakeholder processes to assess sector- and country-specific legal risks. In this regard, producing countries will require sufficient time to complete the necessary legal mapping exercises and multi-stakeholder assessments to ensure that the information reflected in these repositories is robust, credible and up to date.
- (c) Regarding risk assessments, the ICO Secretariat proposes that EUDR annual risk benchmarking ([Article 29 of the EUDR](#)) better reflect national, sub-national, and sector-specific characteristics. A sectoral dialogue with EU Member States' Competent Authorities could further support consistent implementation, a level playing field, and greater legal certainty.
- (d) In line with Article 18 of the EUDR, the ICO Secretariat suggests that assessments by EU Competent Authorities focus primarily on the reliability of operators' due diligence systems. Evidence should support verification of the soundness of these systems, rather than all underlying data.
- (e) The ICO suggests that EUDR implementation pathways allow for progressive adaptation in countries where traceability systems require significant structural transformation, particularly in contexts dominated by unidentified smallholders and non-licensed first-mile intermediary buyers. In such cases, a gradual evolution from territorial approaches could support inclusivity and practical implementation.
- (f) The ICO emphasizes the importance of developing and recognizing forest and coffee sector reference maps, at national and global levels, as of 31 December 2020 (EUDR cut-off date), followed by regular updates. Joint initiatives involving the private sector, as well as FAO, are already improving global data systems on

forest cover and land use for coffee. This information can complement national data systems and support a convergent approach that enhances overall accuracy.

- (g) The ICO Secretariat proposes that specific cases of tree plantation systems associated with coffee production are considered within the framework of agricultural or agroforestry landscapes. In particular, tree plantations within coffee farms should not automatically be categorized as “forest” ([Article 2 of the EUDR](#)), and therefore not automatically classified as deforestation, where these cases remain consistent with the objectives of the Regulation. This includes agricultural agro-silvicultural landscapes combining coffee with short-rotation coppice species, as well as cases where planted trees are replaced by agroforestry coffee systems that may improve soil health, water efficiency, and carbon sequestration.
- (h) Finally, the ICO Secretariat reminds Members that the May 2026 package includes a [draft Delegated Act](#) on product scope. Importantly for the coffee sector, the proposal includes soluble coffee within the scope of the Regulation, and excludes negligible-value samples used for examination, analysis, and testing. Regarding the inclusion of the soluble coffee, the ICO Secretariat considers it important to at least advocate for a sufficient transition period to collect information on coffee plots and value chains contributing to soluble coffee. The draft Delegated Act is **open for global public feedback until 1 June 2026**. Stakeholders from both the public and private sectors may submit comments to the European Commission in accordance with [these indications](#). In case they need the ICO’s support, they can reach out to the ICO Secretariat before the 1st June deadline.

3. Additional inputs from Members related to the EUDR are welcome by **18 June 2026** and can be sent to gasperini@ico.org. The ICO Secretariat will incorporate them into its ongoing exchanges with relevant EU institutions.

4. For additional information on ICO/CPPTF activities related to the EUDR, Members are invited to contact beerlandt@ico.org and will be provided with tailored response.