

CSOs recommendations to make the EU regulation on deforestation-free products work for smallholders and forest communities

November 2022 – As the European Parliament, the European Commission and the Council of the EU are negotiating a compromise on the EU regulation on deforestation-free products, we call upon them to maintain a high level of ambition and refrain from any harmful trade offs. The undersigned CSOs have at heart to ensure that the realities and needs of smallholders and forest communities are taken into account, to ensure an effective implementation of the future EU requirements. We welcome the game-changing [amendments](#) introduced by the Parliament, which have the potential to enable an inclusive implementation of the regulation in smallholder-intensive sectors.

Therefore, we urge the negotiators to support the Parliament's call to include the following elements in the final regulation:

- 1. Including human rights protected under international law in the scope of the regulation, in particular instruments protecting customary tenure rights and the right to Free, Prior and Informed Consent (FPIC)** as set out in the UN Declaration on the Rights of Indigenous Peoples and the Indigenous and Tribal Peoples Convention (No 169, 1989). Ensuring that these rights are respected is crucial to tackle global deforestation.
- 2. Ensuring that the costs of compliance are not pushed down to smallholders, and that they are shared fairly amongst supply chains' actors**, in accordance with their respective capacities
- 3. Including an obligation for operators to undertake reasonable and documented efforts to support the compliance of smallholders' products** in line with the requirements set out in the regulation. It implies adequate assistance such as investments, capacity-building, as well as fair pricing mechanisms - which are essential to address structural underlying patterns that prevent smallholders from producing in a sustainable and deforestation-free way.
- 4. Outlining an obligation for operators to engage meaningfully with vulnerable stakeholders in their supply chains**, such as smallholders, forest communities, Indigenous Peoples and local communities, to inform their due diligence process.
- 5. Including a reference to a comprehensive and time-bound strategy on supply side measures to be developed by the Commission**, with specific attention to the needs of smallholders and forest communities to transition towards sustainable farming and forestry practices, and produce compliant products according to the requirements of the regulation.

Shaping a smallholder-inclusive EU regulation is the prerequisite for a future-proof and fair regulatory framework that can effectively reduce global deforestation, while ensuring no one is left behind.

Signatories

1. Alyansa Tigil Mina (ATM)
2. ASSOCIATION DES PROPRIETAIRES DE FORÊTS NATURELLES ET PLANTATIONS D'AFFERY (APFNP-AFF)
3. CACAO POUR LA PAIX
4. Civic Response
5. CLAC
6. Commerce Equitable France
7. Conservation International
8. Earth Innovation Institute
9. Ecologistas en Acción
10. Environmental Investigation Agency
11. Fair Trade Advocacy Office
12. Fair Trade Ghana Network
13. Fairtrade Africa
14. Fairtrade International
15. Fairtrade NAPP
16. Fern
17. Forests of the World
18. FORTASBI (Indonesian Sustainable Palm Oil Smallholder Forum)
19. Forum Ökologie & Papier
20. Germanwatch e.V.
21. Green Landscapes Initiatives, Liberia
22. IDEF
23. INADES FORMATION CÔTE D'IVOIRE
24. INKOTA netzwerk
25. Journalists for the Protection of Nature
26. Kaoem Telapak
27. Mighty Earth
28. Nitidae
29. Non-Timber Forest Products Exchange Programme (NTFP-EP)
30. Nyt Europa
31. Observatoire Ivoirien pour la gestion durable des Ressources Naturelles (OI-REN)
32. ONG-OPV (Ordre pour la Paix et la Vie)
33. PSOFR+ (Plateforme de la Société civile et des ongs pour les mécanismes Flegt et Redd+)
34. Rainforest Alliance
35. Réseau Africain Pour le Droit à l'Alimentation (RAPDA-CI)
36. Réseau des Organisations de la Société Civile pour le Développement du Tonkpi (ROSCIDET)
37. Réseau Ivoirien du Commerce Equitable (RICE)
38. Rights and Advocacy Initiatives Network
39. Root Capital
40. Sarawak Dayak Iban Association(SADIA)
41. Save My Future (SAMFU) Foundation
42. SIDI (Solidarité Internationale pour le Développement et l'Investissement)
43. Social Entrepreneurs for Sustainable Development (SESDev), Liberia
44. Solidaridad
45. Sustainable Development Institute
46. The DayLight, Inc.
47. The Institute for Ecosoc Rights
48. Tropenbos Ghana
49. Tropenbos International
50. Tropenbos Viet Nam
51. West African Youth Network-Côte d'Ivoire
52. Women in Agriculture for Sustainable Development
53. World Cocoa Farmers Organization (WCFO), Ghana

Solidaridad



Fair Trade
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CONSERVATION INTERNATIONAL



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