

# Consultation Results Synopsis Information to Stakeholders on the Outcome of Consultation Limited Review of the Fairtrade Standard for Coffee To Fairtrade stakeholders Consultation Period 23 August – 04 October 2023 Standard Project Manager Contact Details: Ernesto Gonzalez e.gonzalez@fairtrade.net

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# **PART 1 Project Information**

# 1.1 General Introduction

Fairtrade International's Standards & Pricing (S&P) would like to thank all stakeholders for the time and effort they have put into participating in the consultation process of the limited review of the Fairtrade Standard for Coffee. The consultation concluded on 04 October 2023 with a total of 285 SPOs participating from 20 countries, who gave S&P their views and perspectives. Thanks to these contributions, S&P has gained a good understanding of stakeholders' views on the proposed requirements. This information provides input to further develop the proposals for the Fairtrade Standard for Coffee.

This document aims to present the outcome of the consultation in the most transparent way possible without disclosing confidential stakeholder information.

Should you have any queries or remarks concerning this report, please contact the Standards Project Manager Ernesto Gonzalez: <u>e.gonzalez@fairtrade.net</u>

## 1.2 Executive summary

The following objectives were discussed in this consultation:



• Explore mechanisms to identify and further address deforestation risk in and how these could be included in the standard; enable coffee SPOs to respond to the assurance needs in different consuming countries and regions (EU) with regards to deforestation-free supply chains

Timeline of project:

Activity	Timeline
Public Consultation	August - October 2023
Drafting final proposals	October 2023
SC decisions	November 2023
Publication	Q1 2024

### 1.3 Abbreviations

FI Fairtrade International
FMP Fairtrade Minimum Price
GA General Assembly
GPM Global Product Manager

HRDD Human Rights Due Diligence

HREDD Human Rights and Environmental Due Diligence

ILO International Labour OrganizationNGO Non-Governmental OrganizationNFO National Fairtrade Organization

PN Producer Network
PO Producer Organization
SPO Small Producer Organization

### **PART 2 Consultation outcomes**

### 2.1 Consultation Process and participants

The consultation took place from late August to early-October 2023.

In total 243 inputs were received via the survey, either via the online tool or as word or pdf documents and workshops organize by the PNs. With a clear majority of inputs coming from SPOs from the CLAC region. The workshops that were not possible to identify the role of the actor answering the questions they were represented in another graphs under the group of "mixed workshops", this includes the workshops done in Mexico, Bolivia, Peru and Brazil. From the mixed workshops were received 123 inputs, with a majority coming from producers, with 9 traders and 1 NGO participating along 117 SPOs. With a total of inputs of 349 inputs.

During the consultation workshops carry out by CLAC, it is not possible to know exactly if the feedback is coming from stakeholders agreeing or disagreeing with the proposals, because of this the feedback received from this workshop will be place under a different subsection in each proposal summary.

Below, you find an overview of participation in the consultation in graphs.



Figure 2.1a. Percentages of responses per region

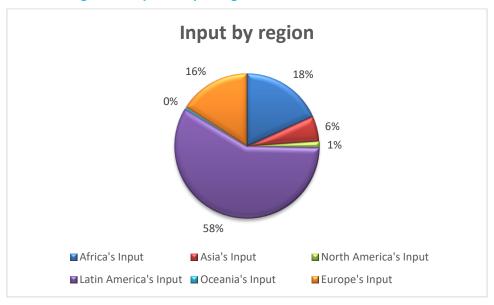


Figure 2.1b. Percentage of supply chain roles of participants

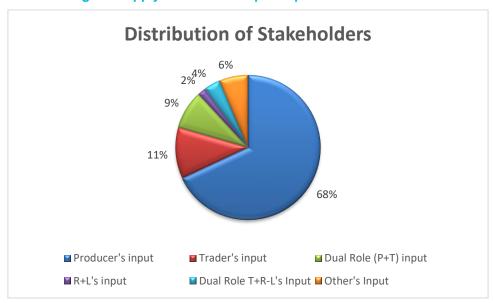




Figure 2.1c. Number of responses of producers per region

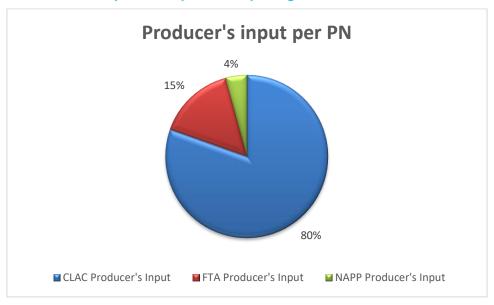


Figure 2.1d. Number of responses of traders per region



### 2.2 Consultation Outcome

This section provides a summary of all proposals and responses received for the proposed requirements and changes based on the findings.

# 2.3 Deforestation monitoring, prevention and mitigation

Fairtrade is fully aware of the environmental regulation buyers must comply with in their regions and that they are looking to producers and certification to support them in fulfilling their obligations. Therefore, this consultation puts forward proposals for standard requirements in coffee to respond to the needs emerging from the new EU regulation of which the coffee sector is a key focus. These proposals have been developed in such a way to encourage closer collaboration between producer



organizations and supply chain operators on the topic of Deforestation. A key objective of the Coffee Standard Review is to strengthen the position of Fairtrade certified SPOs with regards to these regulations and to explore where the responsibility of the SPO ends and where traders are expected to support.

### The proposals aim to:

- Make geolocation data available for 100% of farms, and gradually introduce farm polygons.
- Introduce reporting indicators which are to be shared with Fairtrade International annually, to enable aggregated and anonymized reporting to the public.

### Proposal for the cut-off date

The first option (**Option 1**) proposes to include a cut-off date of 1<sup>st</sup> January 2014, which seeks to ensure that Fairtrade will meet the equivalency mechanism developed by Global Coffee Platform (GCP) which is an important factor for traders when deciding on their sourcing. The proposed cut-off date would ensure access to international markets. Nevertheless it comes with some difficulties when it comes to evaluating the deforestation events starting from 2014, as there is no data available between 2014 to 2016.

The second option (**Option 2**) proposes to include a cut-off date of 31st December 2018 in line with commitments made in both the Fairtrade SPO and Cocoa Standards. This cut-off date assures producers are not excluded from Fairtrade certification if deforestation occurred before the requirement was introduced to the SPO standard. This date also enables more accurate monitoring of deforestation based on good quality data that is available from 2016 onwards. Using good quality data reduces the amount of false alerts of deforestation identified. By providing the most reliable monitoring, Fairtrade retains its credibility and relevance when reporting on deforestation to its stakeholders and the public.

# Which option do you prefer?

Figure 2.3.1a Preference of each option.

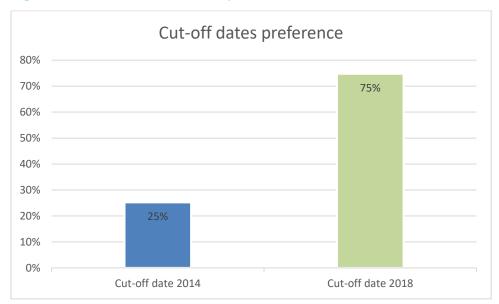




Figure 2.3.1b Preference of each option per supply chain actor

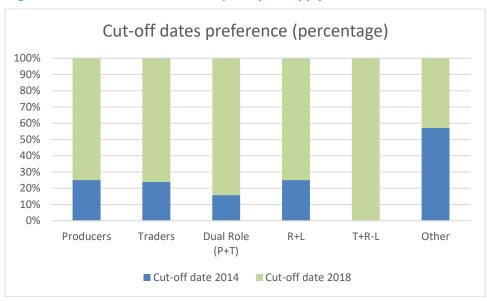
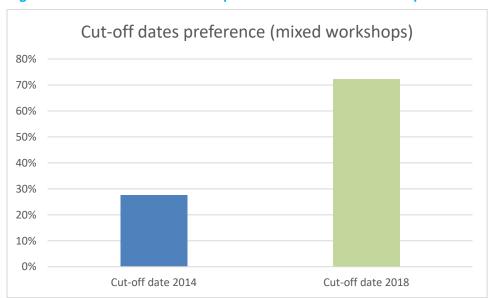


Figure 2.3.1c Preference of each option from the mixed workshops



After the option of the cut-off dates it was proposed 2 writings of the requirement.



# 3.1.1 NEW 2025 Protection of forest and ecosystems Option 1.

<b>Applies to:</b> Fairtrade producer organizations
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Core

Since the 1st January 2014, your members did not cause deforestation or degradation in primary or secondary forests, protected areas and areas of High Conservation Value or Carbon Storage ecosystems to convert land into agricultural production area.

Year 0

Production does not occur in areas officially designated as buffer zones, except where it complies with applicable national law.

**Guidance:** Deforestation is the conversion of forest to other land use or the permanent reduction of the tree canopy cover below the minimum 10 percent threshold (The Global Forest Resources Assessment, FAO, 2015).

The following activities are not considered 'deforestation':

- When a tree crop is replaced by another (for example cocoa, coffee or fruit tree);
- Tree management on agro-forestry or home-garden production systems.

Your members may identify protected areas with the help of local, regional or national authorities. Please note that this requirement complements SPO Standard requirement 3.2.31 "Protection of forests and vegetation".

**Implications:** SPOs will have to develop a members list of farmers that have been part of the organization since 2014. The SPOs will need to keep track of the deforestation happened since 2014. The farmers will not be allowed to increase their production area through deforestation of the land. The proposed requirement allows for the implementation of agroforestry practices and the change of crops.

# Q 1.2 Do you agree with the proposed wording in option 1?

Figure 2.3.2a Agreement percentage per role in the supply chain.

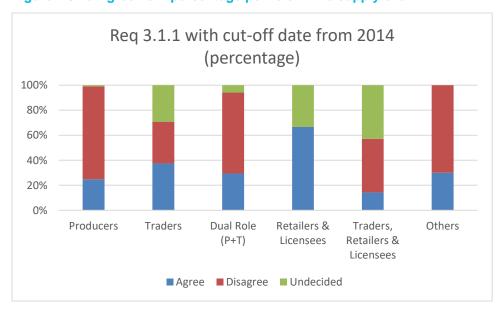
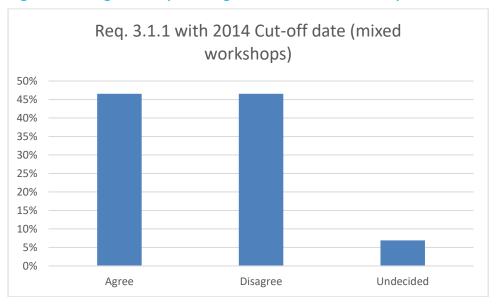




Figure 2.3.2b Agreement percentage from the mixed workshops



### Feedback

From the stakeholder that agree with the requirement they provided the following feedback:

The importance of Fairtrade being part of the Global Coffee Platform (GCP) Equivalence Mechanism (EM) to guarantee market access.

Even if it can become a burden and carry a high risk due to the time frame, it is important to keep Fairtrade Coffee relevant in the environmental aspects.

From the stakeholders that didn't agree with the requirement they had the following feedback:

They perceived high difficulty to gather the necessary data and a generalize feeling of challenge due to the early date.

We should align the requirements with the EU-DR (cut-off date of 2020).

There is worry about the reliability level of the information available to monitor the deforestation from 2014 to 2016.

It can be a problem for new farmers that acquire land through purchase or inheritance.

### Feeback from CLAC workshops

The years from 2014 to 2018 should be seen as a transition period and not mandatory.

They would agree as long as FT provides support to gather the satellite images for the risk assessment and mitigation measures.

There doubts about what will happens to ex members of the SPO that were part of the SPO during the years monitored but they are not members anymore.



Option 2.

Applies	Applies to: Fairtrade producer organizations	
Core	Since the 31 <sup>st</sup> December 2018, your member did not cause deforestation or degradation in primary or secondary forests, protected areas and areas of High Conservation Value or Carbon Storage ecosystems to convert land into agricultural	
Year 0	product in area. Production does not occur in areas officially designated as buffer zones, except where it complies with applicable national law.	

**Guidance:** Deforestation is the conversion of forest to other land use or the permanent reduction of the tree canopy cover below the minimum 10 percent threshold (The Global Forest Resources Assessment, FAO, 2015).

The following activities are not considered 'deforestation':

When a tree crop is replaced by another (for example cocoa, coffee or fruit tree);

Tree management on agro-forestry or home-garden production systems.

Your members may identify protected areas with the help of local, regional or national authorities.

Please note that this requirement complements SPO Standard requirement 3.2.31 "Protection of forests and vegetation".

**Implications:** SPOs will have to develop a members list of farmers that have been part of the organization since 2018. The SPOs will need to keep track of the deforestation happened since 2018. The farmers will not be allowed to increase their production area through deforestation of the land. The proposed requirement allows for the implementation of agroforestry practices and the change of crops.

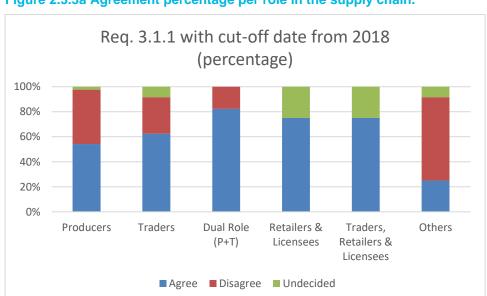


Figure 2.3.3a Agreement percentage per role in the supply chain.



Figure 2.3.3b Agreement percentage from the mixed workshops

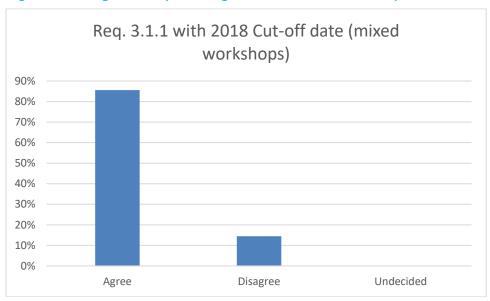


Figure 2.3.3c Comparison of agreement percentage of the cut-off dates

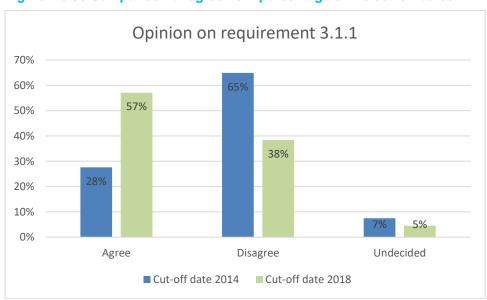




Figure 2.3.3d Comparison of agreement percentage of the cut-off dates and their role in the supply chain

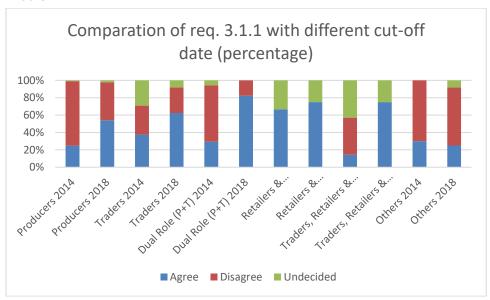
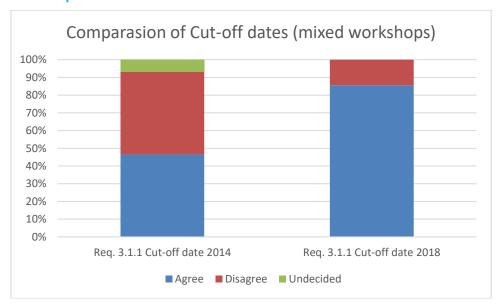


Figure 2.3.3e Comparison of agreement percentage of the cut-off dates in the mixed workshops



# Feedback

The stakeholders that agree with the proposal had the following feedback:

The cut-off date is more feasible to implement for the SPOs.

There is an alignment between the cocoa and SPO standard.

There is more reliable data to monitor the deforestation.

The measure discourage deforestation and keeps the environment intact.

The stakeholders that disagree with the proposal had the following feedback:



There is confusion on the terms use in the requirement and guidance section.

Some stakeholders will prefer alignment with the EU-DR (cut-off date 2020).

There is a high risk of losing market for not aligning with the GCP.

There is risk of non-compliance as some farmers have extended their production plots.

Its good, but not as good as other certification schemes.

The stakeholders that were undecided provided the following feedback:

There could be a gap of information for the small producers.

# Feedback from CLAC workshops

This option looks better because the information is more ready available and is cheaper to get the needed data.

What would happen if a natural disaster destroy a forest inside the area of a farm?

There is a risk for farmer that joined after the cut-off into the SPO, these cases should be considered as "in transition".

It should be clarify how the audits will be carry out.

# 3.1.2 NEW 2025 Assessing and Monitoring deforestation risk

Applies to: Fairtrade producer organizations		
Core	You assess and monitor the risk of deforestation, and degradation in primary or	
Year 1	secondary forests, protected areas and areas of High Conservation Value or High Carbon Storage (at risk areas), when conducting your human rights and environmental risk assessment.	

**Guidance:** Fairtrade's Risk Assessment Tool guides you through a basic risk assessment process and offers you relevant data and research findings. For further guidance, please see Fairtrade's "Implementing Human Rights and Environmental Due Diligence, Guide for Smallholder Farmer Organizations" and Fairtrade's Risk Maps.

Your risk management procedures may include:

- Mapping of relevant areas in the region and cross-checking this information with member farm locations to identify areas at risk.
- Geo location data and polygon maps (including boundaries of the farms) are used as tools to map risk areas accurately.
- Deforestation monitoring data is used to assess risk in relation to your members' farms.
- Identifying if and how your member's activities cause negative impacts on at-risk areas.
- Monitoring members' production practices and other activities in at-risk areas.

Regularity of assessment and monitoring should be based on risk. For example, if your members have risk of deforestation on their farms or within 200m of their boundaries or are in close proximity to a protected area, this is considered high risk and assessment and monitoring should be annual. If your members are in areas where there is no deforestation risk, as there is no forest, then assessment and monitoring can be conducted every three years.

In a year when you admit new members to your organisation they are added to your assessment. You asses the risk of deforestation which could arise due to new members joining your organisation, and you need to define the risk level.



**Rationale:** The requirement seeks to strengthen procedures to prevent deforestation, making preventative measures mandatory for risk assessment and management such as the use of geolocation data and deforestation monitoring data.

**Implications:** This requirement creates additional work for members and SPOs, potentially also additional costs. This will allow to consistently monitor and reduce the deforestation impact on the farms, improving the overall environment of the farm becoming a more responsible sourcing partner.

# Q.1.4 Do you agree with this requirement?

Figure 2.3.4a Global agreement on the proposal

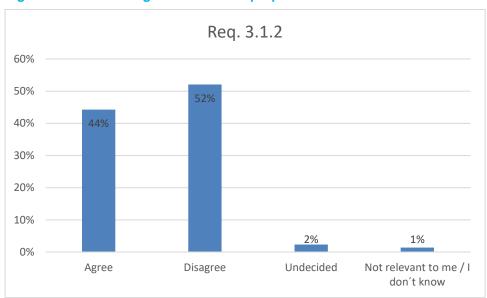


Figure 2.3.4b Percentage of agreement base on their supply chain role

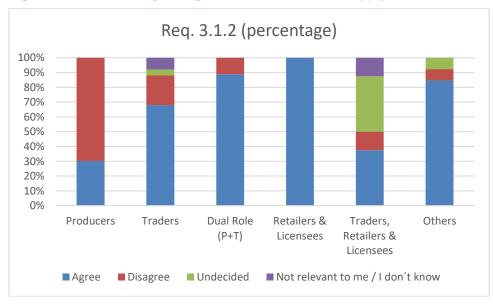
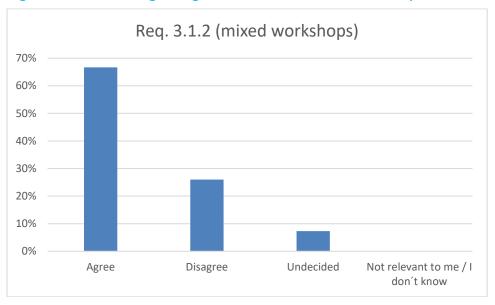




Figure 2.3.4c Percentage of agreement from the mixed workshops



### Feedback

The stakeholders that agree with this proposal provided the following feedback:

It is important to have a risk assessment that allows to do follow-up, guidance and support the producers.

It is important implement action to minimize the risk of deforestation and degradation of the forest.

If all the procedures are followed, deforestation will be eliminated.

There is concern to the cost, the expertise and the finances to implement the requirement. The SPOs aren't in a position to meet them.

Some stakeholders requested examples in the guidance on how to monitor members production practices.

Fairtrade system should provide a tool to assess the risk, monitor and analysing.

There is concern about the cost of implementation.

The stakeholders that disagree with the proposal provided the following feedback:

There is a risk of doubling efforts as some SPOs already have this procedures.

There is great difficulty both technically and financial to implement.

Some agree with the intention of the requirement but no with how is been worded.

### Feedback from CLAC workshops

It is propose that the limits for the monitored is change from "200 meters" to "50 meters".

It is needed that the national legislation is link to the propose requirements.

The guidance should be shorten to only the essentials guidelines for the propose requirement.

It is needed that all the supply chain is committed and support the SPOs.

There is concern for the producers that are set near AAVC and will be considered high risk but have small farms.



# 3.1.3 NEW 2025 Deforestation Prevention and Mitigation Plan

Applies to: Fairtrade producer organizations

You use the results of your human rights/environmental risk assessment and your risk monitoring of deforestation, to create a plan to prevent and mitigate any deforestation and degradation of forest, in order to conserve and restore forest and vegetation. The plan entails:

Raising awareness amongst members on identified risk areas and activities or production practices that have negative impacts.

Promoting the implementation of production practices that have a positive impact.

**Guidance:** Example of implementation practises that have a positive impact include agro-ecological practices, exchange of good practices, demonstration plots, trainings.

**Rationale:** With the sequence of these new requirements, Fairtrade seeks to link the requirements focused on deforestation and degradation into the overall/global HREDD approach. With this specific requirement, SPOs are asked to create a plan which will enable them to use the results of their risk assessment and monitoring, to develop prevention and mitigation activities.

**Implications:** This new requirement creates additional work for members and SPOs, potentially also additional costs. It allows for a systemic follow up into the actions developed to reduce, mitigate and protect the forest. This requirement complements with the requirement 3.1.3 in the Coffee Standard and 3.2.32 in the SPO Standard. The Fairtrade producer organizations become a responsible commercial partner for their buyer as they will have the information needed for commercial due diligence at hand.

# Q.1.5 Do you agree with this requirement?



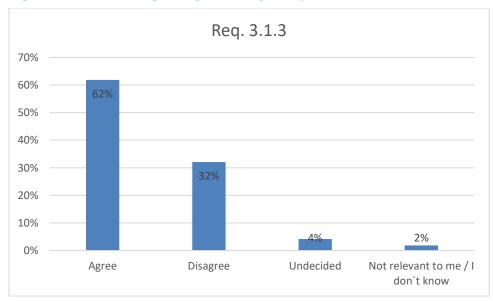




Figure 2.3.5b Percentage of agreement base on their role in the supply chain

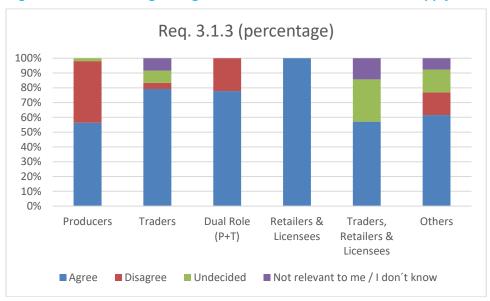


Figure 2.3.5c Percentage of agreement from the mixed workshops



### Feedback

The stakeholders that agree with this proposal provided the following feedback:

Additional guidance is needed to clarify what is needed to comply.

It is encouraging that this requirement link with existing HREDD requirements in all other Fairtrade standards.

Trainings and capacity building will be needed to comply.

Some SPOs recognize that even if it increases some of the financial and technical burden, it will help them improve the management of their farms.

This aligns with the EU-DR and the CSRD.

This proposal is doable.



The stakeholders that disagree with the proposal provided the following feedback.

Extremely financial and technical difficult

It needs to be implemented gradually.

This will need the SPO to go outside their boundaries to implement the plan.

# Feedback from CLAC workshops

It is suggested that the propose requirement link with other environmental requirements (deforestation, climate change, biodiversity and forest management).

Should be indicated the amount of members that are part of the awareness raising plan.

It is not mention the high cost generated by all this new plans.

FT must provide support through trainings and tools that helps to do the risk assessment and plan on prevention and mitigation.

# 3.1.4 NEW 2025 Supporting producers to prevent and mitigate deforestation

Applies to: Traders	
<b>Core</b> You support the SPOs you are sourcing from, with their deforestation and forest degradation risk assessment and mitigation plan, to conserve and restore forest and vegetation.	
Guidance: Your support is either direct or through a partnership. It is in the form of funding, data sharing, training,	

facilitation of partnerships and/or advocacy.

You may share any relevant data including deforestation monitoring data you have on the SPO membership or surrounding area to inform and support the SPO's mitigation activities.

**Rationale:** In order to support the SPO's plan and the related necessary investments, traders should partner with SPOs for these activities.

**Implications:** This requires additional investment by the traders. This will support the due diligence that the SPO and the trader need to carry out in order to gain access to different markets.

# Q.1.6 Do you agree with this requirement?

Figure 2.3.6a Percentage of agreement globally



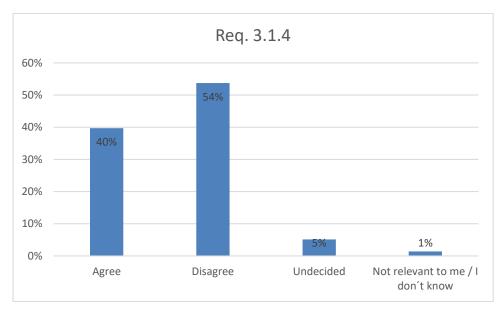


Figure 2.3.6b Percentage of agreement base on their role in the supply chain

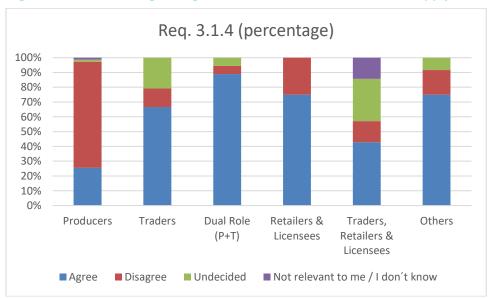
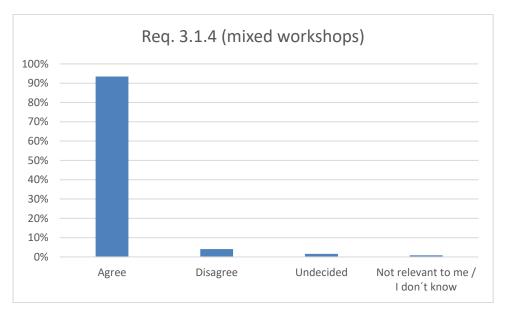


Figure 2.3.6c Percentage of agreement from the mixed workshops





### Feedback

The stakeholders that agree with the proposal provided the following feedback:

All the supply needs to be involved to comply with this requirement.

Traders needs to financially support the SPOs.

There are concerns about how the proposal will be audited.

Share cost structure to comply with all the requirements is a necessity.

The stakeholders that disagree with the proposal provided the following feedback:

The SPOs do not have any control over the support receive.

Is hard for the trader down the supply chain to support the SPOs.

The proposal is too ambiguous.

There is risk that trader will pay less as they are already providing financial support to the SPO.

Some small traders will not be able to support the SPOs up their supply chain.

The stakeholders that are undecided provided the following feedback:

The traders are already exposed to risk, cost and consequences for not complying with the EU-DR, because of this should be left to the call of the traders how to deal with his risk.

# Feedback from the CLAC workshops

It is propose that term "funding" is change to "investment of work capital", so is not mistaken as a credit. It should be included in the guidance the trader should provided hardware support so the SPOs can carry out the geolocation of the farms.

The trader should be committed as part of the sourcing contract to support the SPO in the prevention and mitigation of deforestation actions.

There is concern that the trader could initiate direct trade with the members and leave the SPO outside of the sourcing contract.

Environmental responsibility should not be use as a form of pressure in the commercial relationships.



# 3.1.5 **NEW** Geolocation data

Applies to: Fairtrade producer organizations		
Core	Geolocation data is available for 100% of your members cultivating coffee as GPS location points or GPS polygons.	
Year 0	As a minimum you have GPS polygons for farms over 4 hectares. You identify and prioritize which other farm units should be polygon mapped, based upon area risk of deforestation and adopt a phased approach.  You use the data to further inform your procedures to prevent deforestation.	

**Rationale:** Geolocation data has to be provided for all farm units, so that forest cover loss monitoring can be carried out, and also to enable traceability. Overall, this will mean better deforestation risk management.

**Implications:** If SPOs do not already have this data it will need to be collected. However, many trading partners already possess this data about SPO members which should be shared with partner SPOs (see proposal 3.1.6 below). Having and analysing this data provides SPOs with demonstrable proof of who their members are and where they are in relation to protected areas (through digitalised membership lists and linked mapping of farms).

# Q.1.7. Do you agree with this requirement?

Figure 2.3.7a Percentage of agreement globally

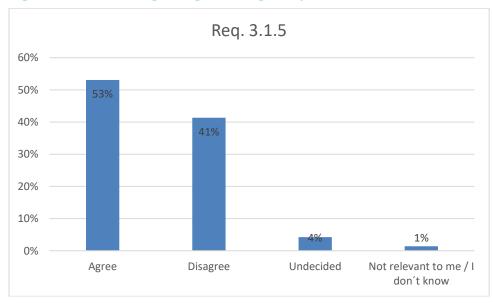




Figure 2.3.7b Percentage of agreement base on their role in the supply chain

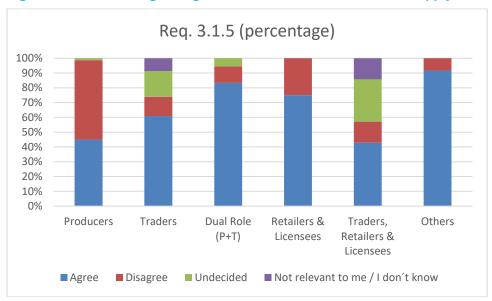
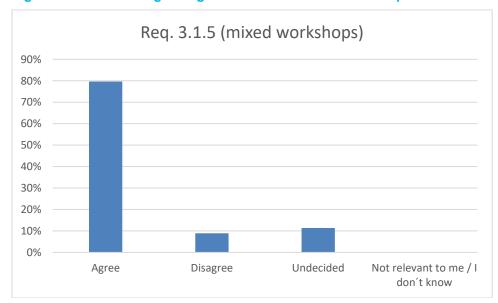


Figure 2.3.7c Percentage of agreement in the mixed workshops



### Feedback

The stakeholders that agree with the proposal provided the following feedback:

Data protection rules should be in place to protect the farms and complying with the requirement.

It is important for SPOs to provide this information to comply with the legislation of the European market. It is important to have this information, but it can become costly fort the SPOs.

Traders that agree with the proposal, mention that is a necessity that suppliers (farms) provide this information to be able to place the coffee in the EU market.

It is unclear what other information should be deliver beside the geo-location to comply with the EU-DR.

Having this information will help SPOs to monitor and plan activities in the farms of their members.



The stakeholders that disagree with the proposal provided the following feedback:

The implementation time is too short, its need to implemented gradually.

It is not responsibility of the SPO to provide this information, but the operator.

The process is too time consuming, the information will be not be ready by the implementation date.

The stakeholders that were undecided about the proposal provided the following the feedback:

There is a general concern about the cost of surveying all the plot of lands.

## Feedback from the CLAC workshops

It is request that only the farm with more than 4 ha must gather the polygon geo-data, instead of including smaller farm with a high risk.

Must be clarify how the polygons will be measure, timelines and it that includes the whole farm or only areas that are been cultivated.

The protection of personal data must the guarantee.

It must the clarify how the risk of deforestation will be measure.

# 3.1.6 **NEW** Sharing geolocation data

Applies	Applies to: Payers and conveyors		
Core	Geolocation data is available for 100% of the coffee farms you are sourcing coffee from as GPS location points or GPS polygons. As a minimum you have GPS polygons for coffee farms over 4 hectares.  You share this data with SPOs so that they can use it to inform their procedures to further prevent deforestation.		

**Rationale:** With this requirement, Fairtrade seeks to ensure that traders share the data which they have available, to support SPOs.

Implications: This reduces duplication of effort and resources.

# Q.1.8. Do you agree with this requirement?

Figure 2.3.8a Percentage of agreement globally



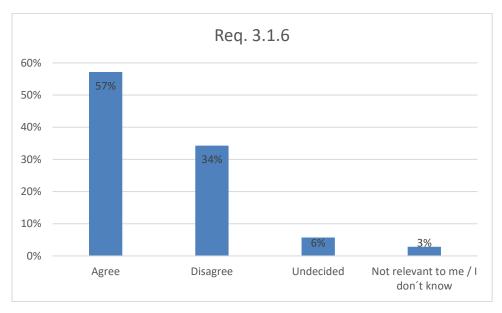


Figure 2.3.8b Percentage of agreement base on their role in the supply chain

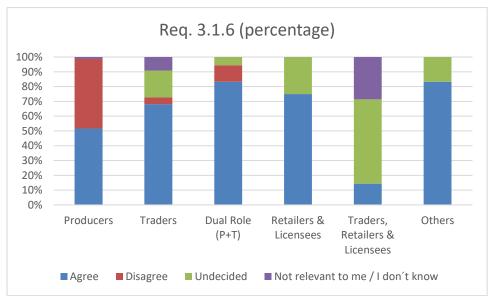
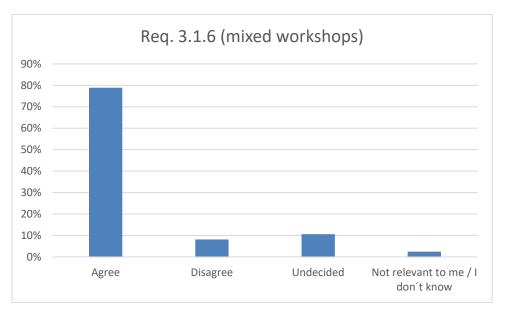


Figure 2.3.8c Percentage of agreement from the mixed workshops





### Feedback

The stakeholders that agree with the proposal provided the following feedback: Data protection is a generalized concern.

The share of the information with reduce the duplication of efforts.

The stakeholders that disagree with the proposal provided the following feedback:

There is concern on sharing the data and the cost of getting and storing the information.

The stakeholders that are undecided about the proposal provided the following feedback:

There is concern about the ownership of the geo-data of the SPO.

The change of ownership of land could affect the veracity of the geolocation data.

Some stakeholders expressed concern about the feasibility of having all the information on time for the implementation.

# Feedback from the CLAC workshops

It is proposed that the requirement change from "Core" to "Development", since not all the SPO sell they product in the EU market and do not have the financial resources to get all the geolocation data.

The reports should be only internal and disclose in a case by case basis.

The trader should have a co-investment agreement with the SPO.

The propose requirement should not be a condition to trade the coffee.

# 3.1.7 NEW SPO reporting

Applies to: Fairtrade producer organizations		
Core	You report data to Fairtrade International every year. You present the data in the	
Year 1	templates and formats provided.	



# **Reporting indicators:**

A. Geolocation and Forest Cover Loss Monitoring Data	- available geolocation data of member coffee farms.
B. Deforestation Prevention and Mitigation Support	- type of support received during the past year, including its estimated monetary value, to prevent and mitigate any deforestation and degradation of forest

**Rationale:** The reporting indicators are planned to be shared with Fairtrade International annually, in order to inform Fairtrade interventions and enable aggregated and anonymized reporting to the public or to stakeholders upon request. This will help to fulfil regulatory demands as well as demands by customers; this will also help to show the impact of the requirement at farmer level.

**Implications:** Implementing reporting indicators will require SPOs to collect and analyse the data and to utilize the analysis to improve their activities. SPOs will need to communicate their results to Fairtrade International and may choose to also share this information with members, buyers and other relevant stakeholders. Introducing and communicating reporting indicators will support producer organizations in improving their deforestation risk management, while also demonstrating to stakeholders that their organization works hard to address deforestation and needs support from business partners and governments.

# Q.1.9. Do you agree with this requirement?



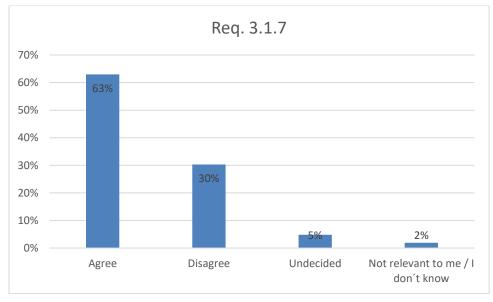


Figure 2.3.9b Percentage of agreement base on their role in the supply chain





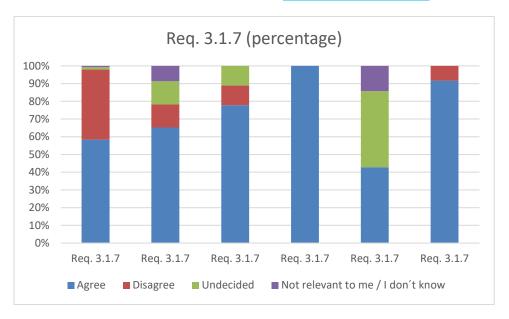
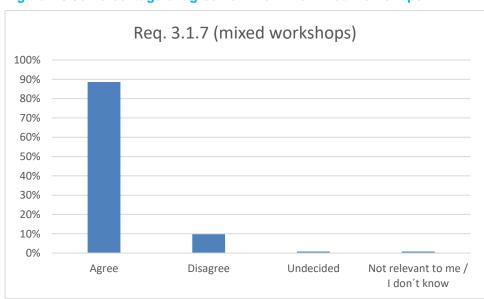


Figure 2.3.9c Percentage of agreement from the mixed workshops



### Feedback

The stakeholders that agree with the proposal provided the following feedback:

There is general consensus that the reporting is necessary but there are concerns regarding data protection.

This will improve the transparency and accountability of the coffee exported.

Could lead to new market partners.

The cadence of the report seems reasonable.

The stakeholders that disagree with the proposal provided the following feedback:

There should be a budget set up to collect and share the information.

The cadence of the reporting is to short, it should longer (3 years)



The reporting should a responsibility of traders, not SPOs.

The stakeholders that are undecided on the proposal provided the following feedback:

There is a lack of personnel and this could lead to lagged work in the SPO.

There is concern that the templates provided will be too complicated to use.

The reporting requirements for the SPO are too high, with minimal benefits for them.

There is doubt that this will be enough to comply with the EU-DR and other deforestation regulations.

# Feedback from the CLAC workshops

The tools mention should be optional.

The reports should be done every 3 years, when the SPO is in a low and medium risk area.

The reports should only be done if the trader have provided support.

There is risk associated with the data management as well as trader could engage directly with the producers instead of going through the SPO.

More reports creates a bureaucratic burden and higher costs.

# 3.1.8 **NEW** Trader reporting

Applies to: Traders	
Core	You report data to Fairtrade International every year. You present the data in the templates and formats provided.

# **Reporting indicators:**

A. Geolocation and Forest Cover Loss Monitoring Data (applies to payers and conveyors only)	- available geolocation data of the farm units you are sourcing from (with the appropriate approval from SPOs)
B. Deforestation Prevention and Mitigation Support (applies to all traders)	- type of support provided to SPOs during the past year, including its estimated monetary value, to prevent and mitigate any deforestation and degradation of forest

**Rationale:** The reporting indicators will be shared with Fairtrade International annually, in order to track Fairtrade's objective of promoting cost sharing of deforestation prevention interventions across the supply chain.

**Implications:** This presents minimal administrative burden for traders and allows them to evaluate the level of support they are providing SPOs with deforestation prevention.

# Q.1.10. Do you agree with this requirement?

# Figure 2.3.10a Percentage of agreement globally



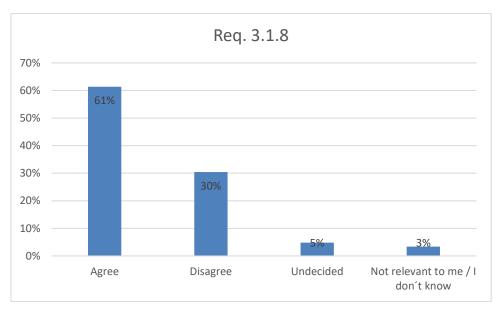


Figure 2.3.10b Percentage of agreement base on their role in the supply chain

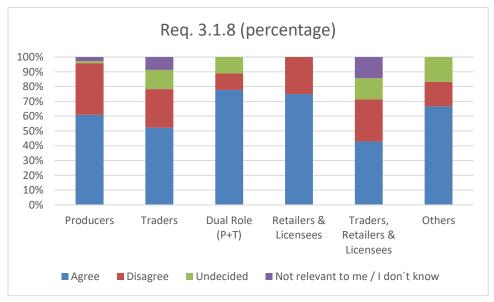
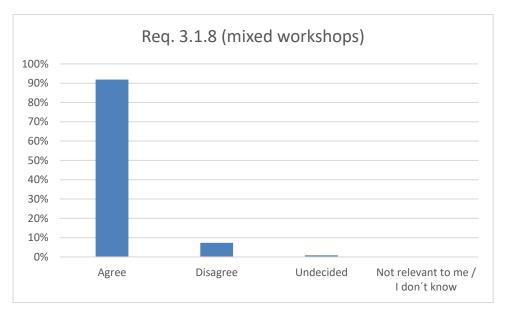


Figure 2.3.10c Percentage of agreement from the mixed workshops





### Feedback

The stakeholders that agree with the proposal provided the following feedback:

There is concern about the data management, and the possibility to anonymize the data of the producers.

The cadence to deliver reports seem agreeable.

This can be seen as a way to enable the cost sharing of the measures implemented to reduce and stop deforestation.

Fairtrade should be able to ensure that all the necessary data is share amongst the supply chain to bring more transparency to the use of the funds given by the traders.

It will improve the visibility of the activities that the SPOs are developing to protect the environment. It will enable a closer relationship between traders and SPOs.

The stakeholders that disagree with the proposal provided the following feedback:

It is suggested that this should only apply to "payers" and "conveyors".

It must be in place commitment and responsibility from the SPO to share the data.

This is a big administrative burden for traders, as some SPOs don't have the necessary means to collect and share the necessary data.

This should only apply to SPOs.

Small trader down the supply chain will have problem providing support as they don't know the SPO or don't have financial resources extras.

# Feedback from CLAC workshops

Should be a formal and written commitment between the trader and the SPO.

It is propose that the SPO sing off the trader report or be informed about the report from the trader.

The confidentiality of the information must be guarantee and must be a commitment of the trader to share the data.

Even if directed to trader, the responsibility fall onto the SPOs.



# 3.1.9 **NEW** Biodiversity Management

Applies to: Fairtrade producer organizations	
Dev	You developed and implement biodiversity monitoring and management plans in your production units.  This plan should help implement measures to protect and improve the biodiversity in your farm.
Year 3	

Guidance: The following tools can be used.

- <u>Biodiversity Performance Tool (biodiversity-performance.eu)</u>
- WP21038.pdf (worldagroforestry.org)
- The Tool Cool Farm Tool | An online greenhouse gas, water, and biodiversity calculator

This requirement complement the requirement 3.2.33 from the SPO standard.

**Rationale:** This requirement complements the alignment with the European Union Deforestation Free Commodities regulation and allows to track impact of the environmental plans in the SPOs. As many of the due diligence regulations on environmental management now have a strong biodiversity component, it is important for producer organizations to be aware of them and be as responsible as possible.

**Implications:** This implies the development of two new plans. It could represent new expenses to hire an expert to implement the biodiversity monitoring. At the same time, it will allow to present the impacts that the SPO have in the biodiversity of their production units.

# Q.1.11. Do you agree with this requirement?

Figure 2.3.11a Percentage of agreement globally

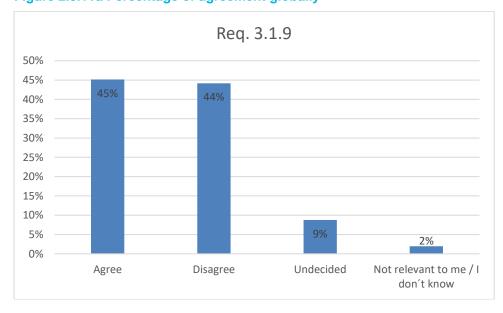




Figure 2.3.11b Percentage of agreement base on their role in the supply chain

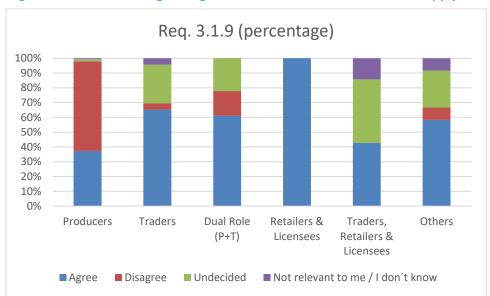


Figure 2.3.11c Percentage of agreement from the mixed workshops



### Feedback

The stakeholders that agree with the proposal provided the following feedback:

They agree with it as long it is introduced as an development requirement.

It could become "practices" instead of plans.

It will help boos the environmental framework of the standard.

It its important for traders for their CSRD.

The use of technological tools to track environmental development are good to help reduce other environmental risks.

Trainings are required to reduce deforestation, emphasis in agro-forestry and biodiversity management.



The stakeholders that disagree with the proposal provided the following feedback:

This proposal will require specialized personal that is able to do the monitoring of biodiversity, bringing alongside additional costs.

It should be part of the environmental plans, not an stand-alone plan.

The stakeholders that were undecided about the proposal provided the following feedback:

Their decision will depend on coast and definition of the monitoring and management plan.

The requirement looks too big and complicated.

It is not clear if will be needed specialized skills, it is not clear if the SPO will be able to use the tools mention in the guidance.

### Feedback from CLAC workshops

It should be change the terms "protect and improve" to "conservate". As there is no a responsibility of the SPO, plus is needed technical capacity and budget.

It should be removed as it is included in one way or another in the previous proposals.

It should be "practices" instead of "plans".

Most countries regulate this topics through their national legislation, this lead to duplication of efforts and actions.

# Q.1.12. Other general feedback on deforestation risk and traceability

Traceability is a key in demonstrating compliance with the legislation, it will be good to see more about how this will be encouraged and managed.

Is a very complex initiative, is needed but difficult the trade of coffee to Europe.

Its propose that the cut-off date is set the same as EU-DR 31/12/2020.

There is a generalize concern about the financial resources needed to comply with the proposals ant the trainings and knowledge require to implement such proposals.

There is a concrete need of support from the traders to SPOs to implement the proposals, as well as more open relationships between those 2 to guarantee the timely and correct flow of information.

The time frame for implementation seems to short, should be implemented gradually or with a longer timeline

Many SPOs are already implementing agroforestry practices in their production system, will this be recognize as compliance against some of the requirements.

# General feedback forms the CLAC workshops

The purchased from the SPO should not be conditional to the compliance of this requirements.

The tools propose should be available and must be share prior of the implementation.

Should be region specific standards.

All the actors of the supply chain must be involved, as well as external stakeholders inside the intervention areas.