

Brussels
Monday, 21 February 2022

CEFS POSITION

TO THE COMMISSION PROPOSAL ON DE-FORESTATION

The European Association of Sugar Manufacturers (CEFS) supports the Commission's efforts to put in place concrete initiatives to combat deforestation.

Sustainability has long been at the heart of the EU sugar sector. We fully support the European Commission in requiring that "imports must comply with relevant EU regulation and standard requirements".

We take note of the proposal for a regulation on deforestation-free products, which would cover six agricultural commodities and their derivatives set out in the Annex: cattle, cocoa, coffee, oil palm, soya, and wood.

CEFS' position is that products that are linked to deforestation both in Europe and in third countries have no place on the EU market. In addition, any future EU legal framework covering imported deforestation should address the link between imported commodities and indirect deforestation.

Sugar cane is an important driver of deforestation worldwide (both direct and indirect). Proper consideration should therefore be given to the inclusion of sugar cane and its derivative, namely cane sugar in the annex to the regulation on deforestation-free products.

The proposed Commission regulation foresees mandatory due diligence rules for all operators placing the commodities and products on the EU market or exporting them from the EU. These rules include strict traceability requirements linking the

📍 Avenue de Tervuren 268, B-1150, Brussels, Belgium

CONTACT

European Association of Sugar Manufacturers
Marie-Christine Ribera
Director General
+32 2 762 07 60
mariechristine.ribera@cefs.org



commodity to the plot of land where it was produced. Although this system is welcome, operators will need time to adapt to the new requirements. In some regions farm-level traceability is not yet in place due to the logistical setup, such as in-land and harbour terminals. Operators should be given the possibility to develop the appropriate tools before the regulation enters into force.

Furthermore, the new EU legislation should not only ban access of deforestation-related products to the Single Market, but also address the problem at its root. An autonomous regulation is a step in the right direction; however, the inclusion of a chapter on deforestation in all new and existing EU trade agreements is essential. This point is particularly important for trade agreements with regions in the world suffering from deforestation. An example of why such a move is necessary is the decision taken by Brazilian authorities in 2019, which allows sugar cane cultivation to take place in the Amazon region. In addition, sugar cane expansion is expected to take over cropland and pasture causing further expansion of farmland over forests and other types of natural cover, with the Cerrado ecosystem and the southern fringe of the Amazon rainforest being the most affected. Considering the above, CEFS reiterates its opposition to the ratification of the EU-Mercosur Agreement.

📍 **Avenue de Tervuren 268, B-1150, Brussels, Belgium**

🌐 www.cefs.org

🐦 [@SugarEurope](https://twitter.com/SugarEurope)

☎ **+32 2 762 07 60**