

The Impact of the EU Deforestation-free Regulation on Indonesia's National Policies for Sustainable Coffee Commodity Management

Lipul^{1*}, Nita Noriko¹

¹Master Program in Management of Natural Resources, Faculty of Science and Technology, Universitas Al-Azhar Indonesia, Jl. Sisingamangaraja, Kebayoran Baru, South Jakarta, 12110, Indonesia

Corresponding Author/E-mail: rizka.uai@gmail.com

Abstract – As one of the world's largest coffee producers, Indonesia faces a new challenge with the enactment of the EU Deforestation-free Regulation (EUDR) by the European Union, a vital export market. This regulation requires that coffee products entering the EU market must be proven not to originate from land deforested after December 31, 2020. The objective of this article is to conduct an in-depth analysis of the EUDR's impact on the Indonesian coffee supply chain, evaluate the readiness of existing national policies, and identify policy responses that have been and need to be implemented. This study employs a qualitative method using a policy analysis approach and a comprehensive literature review of regulatory documents, government reports, and scientific publications. The results indicate significant challenges, particularly for millions of smallholder farmers, which include the obligation to provide geolocation data, fulfill due diligence requirements, and prove land legality, which is often undocumented. A gap was found between Indonesia's existing sustainable coffee management policies and the stringent requirements of the EUDR, especially concerning farm-level traceability. Although the Indonesian government has initiated several responsive measures, such as establishing a task force and diplomatic efforts, an acceleration in the development of an integrated and inclusive national traceability system is necessary. This article concludes that the EUDR, while a potential trade barrier, can also function as a catalyst to accelerate governance reforms in Indonesia's coffee sector towards more verifiable sustainability. Strategic policy implications are emphasized on strengthening farmer capacity, harmonizing regulations, and utilizing digital technology to ensure Indonesian coffee remains competitive in the global market.

Abstrak - Sebagai salah satu produsen kopi terbesar di dunia, Indonesia menghadapi tantangan baru dengan diberlakukannya European Union Deforestation-free Regulation (EUDR) oleh Uni Eropa, yang merupakan salah satu pasar ekspor utama kopi Indonesia. Regulasi ini mensyaratkan bahwa produk kopi yang masuk ke pasar Uni Eropa harus dapat dibuktikan tidak berasal dari lahan yang mengalami deforestasi setelah 31 Desember 2020. Artikel ini bertujuan untuk menganalisis secara mendalam dampak EUDR terhadap rantai pasok kopi Indonesia, mengevaluasi kesiapan kebijakan nasional yang telah ada, serta mengidentifikasi respons kebijakan yang telah dan perlu diimplementasikan. Penelitian ini menggunakan metode kualitatif dengan pendekatan analisis kebijakan dan tinjauan pustaka komprehensif terhadap dokumen regulasi, laporan pemerintah, dan publikasi ilmiah. Hasil penelitian menunjukkan adanya tantangan yang signifikan, terutama bagi jutaan petani kopi rakyat, meliputi kewajiban penyediaan data geolokasi, pemenuhan persyaratan due diligence, serta pembuktian legalitas lahan yang sering kali tidak terdokumentasi dengan baik. Ditemukan adanya kesenjangan antara kebijakan pengelolaan kopi berkelanjutan yang telah diterapkan di Indonesia dengan persyaratan EUDR yang lebih ketat, khususnya terkait ketertelusuran (traceability) pada tingkat lahan usaha tani. Meskipun pemerintah Indonesia telah menginisiasi berbagai langkah responsif, seperti pembentukan satuan tugas dan upaya diplomasi, percepatan pembangunan sistem ketertelusuran nasional yang

terintegrasi dan inklusif masih diperlukan. Artikel ini menyimpulkan bahwa EUDR, meskipun berpotensi menjadi hambatan perdagangan, juga dapat berfungsi sebagai katalisator untuk mempercepat reformasi tata kelola sektor kopi Indonesia menuju keberlanjutan yang lebih terverifikasi. Implikasi kebijakan yang strategis ditekankan pada penguatan kapasitas petani, harmonisasi regulasi, dan pemanfaatan teknologi digital guna memastikan kopi Indonesia tetap kompetitif di pasar global.

Keywords - Due Diligence, EUDR, Indonesian National Policy, Supply Chain Traceability, Sustainable Coffee Management.

INTRODUCTION

Indonesia holds a strategic role in the global coffee map, consistently ranking as one of the top four coffee producers in the world, alongside Brazil, Vietnam, and Colombia [1]. This commodity is not only a significant source of state foreign exchange but also the economic backbone for more than two million farming families, the majority of whom manage small-scale plantations (less than two hectares) [2]. Concurrently, with the rise of global consumer awareness regarding environmental and social issues, the demand for agricultural products produced sustainably and ethically continues to increase. This trend is compelling consumer countries, especially in the European Union (EU), to implement stricter standards on imported products.

As a manifestation of this commitment, in 2023, the European Union officially adopted the EU Deforestation-free Regulation (EUDR) [3]. This regulation aims to ensure that certain commodities placed on the EU market no longer contribute to deforestation and forest degradation worldwide. The EUDR applies to seven main commodities: palm oil, timber, coffee, cocoa, soy, rubber, and cattle, along with their derived products. The primary requirements mandated by the EUDR can be summarized into three fundamental pillars:

1. **Due Diligence:** Operators or importers in the EU are required to conduct a due diligence system to verify that the products they import are deforestation-free. This includes information collection, risk assessment, and risk mitigation.
2. **Geospatial Information:** Every consignment of products must be

accompanied by geolocation data (polygon coordinates) of the plot of land where the commodity was produced. The cut-off date for deforestation is set at December 31, 2020.

3. **Compliance with Local Law:** Products must be produced in accordance with all relevant laws and regulations in the producer country, including those related to land rights or farm legality, environmental protection, and labor rights.

The implementation of the EUDR presents complex and significant challenges for Indonesia's coffee supply chain. The long and fragmented national coffee supply chain structure, with its dominance of smallholders, is a central issue. Many of these farmers face constraints in terms of legality and documentation of land ownership, which is a prerequisite under the local law compliance pillar [4]. Furthermore, the absence of a robust and standardized traceability system from the farm to the point of export is a structural weakness that can hinder the fulfillment of the geolocation obligation. The potential for high compliance costs for land mapping, data collection, and verification is feared to become a disproportionate burden on smallholders, which could ultimately threaten their exclusion from the export supply chain to the EU, a market that absorbs around 15-20% of Indonesia's total coffee exports [5].

Based on this background, this study formulates several key research questions: (1) How do the main provisions in the EUDR specifically impact each node in the coffee supply chain in Indonesia? (2) To what extent are Indonesia's current national policies, including certification schemes and

development programs, able to meet the demands of the EUDR? (3) What policy responses have been taken and need to be developed by the Indonesian government to mitigate the risks and leverage the opportunities from the implementation of the EUDR?

This article aims to analyze the multidimensional impact of the EUDR on Indonesia's coffee sector, evaluate the readiness and gaps in national policy, and formulate strategic recommendations. The scope of the analysis is focused on the coffee commodity and the policy framework at the national level.

METHOD

This study adopts a qualitative approach to gain a deep and contextual understanding of the impact of the EUDR on coffee policy in Indonesia. The primary method used is policy analysis combined with a systematic literature review. This approach was chosen because it allows for a comprehensive analysis of complex regulatory documents, as well as the synthesis of information from various sources to build a coherent argument [6].

Data collection was conducted entirely through secondary sources. These sources are classified as follows:

1. Regulatory and Policy Documents: The official document of Regulation (EU) 2023/1115 (EUDR) from the European Commission, relevant laws and regulations from the Indonesian government such as regulations from the Ministry of Agriculture, the Ministry of Trade, and the Ministry of Environment, and the Ministry of Forestry.
2. Institutional Reports and Publications: Reports from international organizations such as the International Coffee Organization (ICO), the Food and Agriculture Organization (FAO), and the World Bank; reports from government agencies such as Statistics Indonesia (BPS); and reports from national and international non-governmental organizations (NGOs) focusing on sustainability and agriculture.
3. Academic Literature: Articles from peer-

reviewed scientific journals that discuss coffee supply chains, agricultural policy, international trade, and deforestation issues in Indonesia.

4. Media Sources: News articles and analyses from leading media outlets covering the development of the EUDR and the responses of stakeholders.

The data analysis technique used is qualitative content analysis. This process involves the identification, coding, and categorization of key themes that emerge from the collected data, such as implementation challenges, policy gaps, and response strategies [7]. Subsequently, a comparative analysis is conducted to systematically compare the requirements mandated by the EUDR with the capabilities, programs, and regulatory framework currently in place in Indonesia. This analysis aims to specifically identify the strengths and weaknesses in the national coffee governance system in facing the new demands from the EU market.

RESULTS AND DISCUSSION

Analysis of EUDR Provisions and Their Implications for the Coffee Sector

The EUDR's requirements carry direct and varied implications for each actor along the Indonesian coffee supply chain. The obligation to provide geolocation data presents the most fundamental challenge. For a coffee farmer in the Gayo highlands of Aceh, or on the slopes of Mount Ijen in East Java, this means they must be able to provide accurate geographic coordinates of their farm boundaries [8]. Given that the majority are smallholders with varying levels of digital literacy and limited access to GPS technology, fulfilling this requirement necessitates massive technical intervention and assistance.

For collectors at the village and sub-district levels, who traditionally mix coffee beans from dozens or even hundreds of farmers, the EUDR demands a system of segregation. They must be able to ensure that the coffee they buy from farmers whose land is compliant (deforestation-free and with geolocation data) is not mixed with coffee from unverified sources. This drastically changes their business model and requires investment in more sophisticated

recording and labeling systems. For processors and exporters, the due diligence obligation becomes the center of their operations. They are the parties ultimately responsible to the EU importers for providing all necessary documentation. This means they must build a solid traceability system from upstream to downstream, capable of tracing every sack of coffee back to the specific plot of land where it was grown. This burden of proof creates significant operational risks and costs [9].

Evaluation of Indonesia's National Policies Regarding Sustainable Coffee

Prior to the EUDR, Indonesia had a series of policies and initiatives aimed at promoting sustainability in the coffee sector. One of the most prominent is the Geographical Indication (GI) certification scheme, as seen with Gayo Coffee, Toraja Coffee, and Kintamani Bali Coffee [10]. Although GI has successfully enhanced the reputation and value of coffee from specific regions, its main focus is on quality and uniqueness of origin, not on plot-level proof of being deforestation-free. The traceability system within GI often only extends to the farmer group or village level, not yet reaching the individual plot level demanded by the EUDR.

Programs from the Ministry of Agriculture, such as coffee rejuvenation, rehabilitation, and intensification programs, have also been implemented. However, these programs are more oriented towards increasing productivity and quality, and have not yet explicitly integrated land mapping and deforestation monitoring components as a primary requirement [11]. On the other hand, the adoption of voluntary certification schemes by the private sector, such as Rainforest Alliance/UTZ and Fairtrade, has helped some farmers connect with premium markets. These schemes have strong traceability and environmental standards, but their coverage is still limited and has not reached the majority of coffee farmers in Indonesia [12].

A gap analysis shows that the main weakness of the existing policy framework is the absence of an integrated and mandatory national traceability system. The existing systems are partial, voluntary,

and non-standardized. There is no single platform that can verify the deforestation-free status and land legality for all coffee produced in Indonesia, which

is an essential prerequisite for meeting the EUDR's demands efficiently and at scale.

Initial Responses of the Indonesian Government and Stakeholders to the EUDR

Through a press release from the Coordinating Ministry for Economic Affairs of Indonesia, numbered HM.4.6/281/SET.M.EKON.3/08/2023 [13], it was stated that Indonesia, Malaysia, and the European Union have officially formed the Ad Hoc Joint Task Force on EUDR as a forum for dialogue and technical cooperation to address various issues arising from the implementation of the EU Deforestation-free Regulation (EUDR). This task force was formed after a series of bilateral meetings, including a joint Indonesia-Malaysia mission to Brussels in May 2023 and a reciprocal visit by the European Union to Southeast Asia. The first meeting was held on August 4, 2023, in Jakarta, with the aim of developing a framework that includes the involvement of smallholders, recognition of national certification schemes, and the use of scientific data on deforestation. This initiative is important for bridging the differences in perspective between producer countries and the European Union, as well as ensuring that the implementation of the EUDR does not negatively impact market access for key commodities like coffee and palm oil, especially those produced by smallholders. The task force is expected to complete its work agenda before the end of 2024.

Furthermore, in facing the EUDR implementation deadline, the Indonesian government and other stakeholders have also begun to take action. The government, through coordination among the Coordinating Ministry for Economic Affairs, the Ministry of Trade, the Ministry of Agriculture, the Ministry of Environment, and the Ministry of Forestry, has formed a National Task Force for the sustainability of plantation commodities [14]. The main task of this task force is to formulate a national strategy, conduct negotiations and diplomacy with

the European Union, and prepare supporting infrastructure within the country.

Active diplomatic efforts are being made to convey Indonesia's concerns that the EUDR could be discriminatory and become a non-tariff trade barrier, especially for smallholders. Indonesia, together with Malaysia, has voiced the need for an adequate

transition period and recognition of existing national certification schemes [15].

At the technical level, initiatives to develop a national traceability platform are beginning to be discussed intensively. This platform is expected to integrate data from various ministries, such as land cover data from Ministry of Environment and Forestry (KLHK), farmer data from the Ministry of Agriculture, and land data from the Ministry of Agrarian Affairs and Spatial Planning (ATR/BPN). The private sector, through associations like the Association of Indonesian Coffee Exporters (GAEKI), is also proactive in providing input to the government and has begun to socialize the EUDR requirements to its members [16]. Civil society organizations are also playing a role in pilot projects for land mapping and farmer assistance in various regions.

Towards an Adaptive Sustainable Coffee Management Model

The central debate concerning the EUDR is whether this regulation should be viewed purely as a trade barrier or as a catalyst for change. From the perspective of a trade barrier, the EUDR clearly increases compliance costs, creates uncertainty, and risks marginalizing vulnerable small-scale producers. However, from a catalyst perspective, the EUDR forces Indonesia to accelerate long-overdue reforms in its plantation sector governance [5]. The demand for geolocation and land legality data pushes the government to resolve fundamental issues related to tenurial security and spatial planning. This is in line with the study conducted by Sidabutar (2024) [19] which highlighted the impact of the EUDR and suggested the need for responsive domestic policies to reduce the negative effects of potential trade barriers.

The challenges faced by Indonesia are not unique. Other major coffee-producing countries like Brazil and Vietnam also face similar pressures. However, the more consolidated land ownership structure in Brazil, with its large plantations, may provide an advantage in implementing traceability compared to Indonesia, which is dominated by smallholders [17].

Furthermore, efforts to comply with the EUDR have strong potential synergies with the achievement of Indonesia's Sustainable Development Goals (SDGs). Improved traceability and sustainable

agricultural practices directly contribute to SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action), and SDG 15 (Life on Land). With better farmer and land data, the government can also design more targeted poverty alleviation programs (SDG 1) in coffee-farming communities. Thus, investment in EUDR compliance can be seen as a long-term investment in the competitiveness and sustainability of Indonesia's entire agricultural sector.

Emerging Issues, Benefits, and Challenges in EUDR Implementation for Indonesian Coffee Farmers

In line with the previous explanations, the EU Deforestation-free Regulation (EUDR) can be seen as an ambitious policy that has the potential to revolutionize global supply chains. For Indonesian coffee farmers, this regulation acts as a double-edged sword: on one hand, it promotes sustainable practices and enhances product value; on the other hand, it poses significant challenges regarding compliance costs and market access. With all the dynamics involved, EUDR is certain to impact thousands of coffee farmers across Indonesia.

a. Current Issues Related to EUDR in Indonesia

The implementation of EUDR remains a topic of intense discussion between the Government of Indonesia and the European Union, with several critical issues emerging:

1. Commodity Exemptions and Recognition of Agroforestry Practices

The Indonesian government has actively submitted requests for commodities such as coffee and cocoa to be excluded from EUDR coverage, or at least to be granted special treatment. The rationale is that most of these commodities in Indonesia are produced by smallholder farmers who practice agroforestry—a land-use method that supports ecosystem sustainability and biodiversity, rather than causing deforestation. Bilateral negotiations are ongoing, with Indonesia awaiting an official response from the European Union following a key meeting in Brussels. President Joko Widodo has publicly stated that if EUDR is implemented in a discriminatory manner, Indonesia is prepared to

escalate the issue to the World Trade Organization (WTO) [20][21].

2. Implementation Delay and Updated Technical Guidelines

The European Union has revised the implementation timeline for EUDR. The compliance deadline for large companies has been postponed to December 30, 2025, while small and medium-sized enterprises (SMEs) are given until June 30, 2026. This delay provides businesses with more time to prepare. In addition, the EU has released updated technical guidelines to simplify the reporting process, although the complexity of the regulation remains a concern [22][23].

3. Potential Discrimination and WTO Conflict Risks

Concerns about potential discrimination persist, particularly due to the “low-risk” classification, which may favor producers within the EU over those in developing countries. International trade law experts have indicated that EUDR may violate WTO principles, providing a strong legal basis for affected countries to file formal disputes [24].

b. Potential Benefits and Implementation Challenges for Indonesian Coffee Farmers

Despite the emerging issues, EUDR also offers several long-term benefits for Indonesian coffee farmers who are able to adapt:

1. Promotion of Sustainable Agricultural Practices

EUDR inherently encourages the adoption of more environmentally friendly and sustainable farming methods. Farmers who can demonstrate that their coffee is produced without contributing to deforestation will gain a competitive edge in an increasingly eco-conscious global market.

2. Improved Product Quality and Traceability

EUDR’s stringent traceability requirements mandate comprehensive documentation throughout the supply chain. This will drive farmers to improve product quality and adopt more accurate record-keeping systems, enhancing transparency and trust in Indonesian coffee.

3. Better Market Access and Premium Pricing Opportunities

Farmers and exporters who successfully meet EUDR standards will have greater access to the European market—one of the largest coffee importers in the world. Certified deforestation-free coffee may command premium prices, thus increasing farmers’ incomes.

4. Strengthening of Agroforestry Systems

If the European Union recognizes and values agroforestry as a viable sustainability solution, coffee farmers who already practice this method will stand to benefit significantly. This recognition could further encourage the expansion of agroforestry systems that balance productivity with environmental conservation.

However, several notable challenges remain—particularly for smallholder coffee farmers:

1. Compliance Cost Burden

Smallholders often lack the resources and access to technology needed to meet requirements such as high-precision geotagging, transparent supply chain documentation, and complex, costly certification processes.

2. Limited Access to Information and Capacity Building

Many farmers still do not fully understand the details and implications of EUDR. A lack of access to accurate information and compliance training poses a major barrier.

3. Risk of Market Exclusion

Without sufficient support, smallholders risk losing access to the European market, which could seriously impact their livelihoods. Fears of discrimination or new trade barriers become real if EUDR requirements are not aligned with the realities faced by farmers in developing countries.

4. Supply Chain Coordination

Ensuring full EUDR compliance across the entire supply chain—from farm to exporter—requires

CONCLUSION

The EU Deforestation-free Regulation (EUDR) fundamentally changes the landscape of the coffee trade between Indonesia and the European Union. This regulation presents significant structural challenges for Indonesia's coffee supply chain, which are rooted in the dominance of smallholders, the complexity of the supply chain, and land tenure issues. The main findings show that the existing sustainability policies and infrastructure in Indonesia are not yet fully adequate to meet the stringent requirements of the EUDR, especially in terms of comprehensive geospatial-based traceability.

Nevertheless, the EUDR also acts as a strong driving momentum for Indonesia to accelerate the reform of its coffee sector governance. The initial responses from the government and stakeholders show an awareness and political will to address these challenges. Indonesia's success in maintaining its coffee market access in the EU will heavily depend on its ability to implement an adaptive and inclusive management model.

Based on the analysis conducted, several strategic policy implications are recommended:

1. **Acceleration of National Traceability System Development:** The government needs to prioritize the development of an integrated, accessible, and affordable national digital platform capable of validating geolocation and land/farm legality data from the farmer level.
2. **Empowerment and Support for Smallholders:** A massive program of technical assistance and financial support is needed for farmers to conduct land mapping, registration, and adoption of Good Agricultural Practices.
3. **Strengthening of Trade Diplomacy:** Indonesia must remain active in diplomatic forums to ensure the EU's implementation of the EUDR is fair, non-discriminatory, and considers the capacities of developing countries, including the possibility of future recognition of Indonesian national standards.
4. **Harmonization of Internal Regulations:** Policy alignment between ministries (Agriculture, Environment, Forestry, Trade, ATR/BPN) is necessary to eliminate regulatory overlaps and simplify the process of verifying legality and sustainability at the domestic level.

This research has limitations as it is based on secondary data and a policy situation that is still very dynamic. Future research can be deepened through qualitative case studies at the district level in coffee production centers to understand the impact of the EUDR more granularly, as well as through quantitative analysis to model the economic impact of compliance costs on farmer incomes.

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