

Cocoa Coalition joint position paper

The proposed EU Forced Labour Regulation

29 March 2023



The signatories to this position paper support the objectives of the proposed EU Regulation on Prohibiting Products Made With Forced Labour on the Union Market (COM(2022)453). We believe that the proposed Regulation, complemented by other EU legislation and by measures to develop an enabling environment in the countries of origin, has the potential to contribute to the transformation of the cocoa and chocolate sector towards a sector that fully respects human rights and environmental sustainability.

In terms of the content of the proposed Regulation, we endorse the suggested areas for improvement included in the [response](#) to the European Commission's consultation on the proposal developed by the International Cocoa Initiative (one of the members of the Cocoa Coalition), covering definitions, enforcement and guidance, remediation, purchasing practices and state-imposed forced labour.

We particularly endorse the paper's proposal for the EU to implement complementary measures to support the development of an enabling environment in the countries of origin, helping to address the root causes of forced labour – in line with the [proposals on partnerships](#) we published in 2021.

In common with our comments on the [EU Regulation on Deforestation](#) and the proposed [EU Directive on Corporate Sustainability Due Diligence](#), we also stress the importance of ensuring that the costs of compliance with the Regulation are shared fairly across the supply chain, and do not fall only on cocoa farmers. Similarly, it will be important to ensure that the Regulation promotes engagement with cocoa farmers in a genuine effort to eradicate forced labour, rather than incentivising disengagement by companies importing cocoa into the EU.

We look forward to contributing to the development, by the European Commission, of appropriate guidelines to support companies' implementation of the Regulation.

Contact details for supporting organisations

Fairtrade International

Jon Walker, Senior Advisor, Cocoa (press@fairtrade.net)

Fair Trade Advocacy Office

Charlotte Vernier, Policy and Project Coordinator (vernier@fairtrade-advocacy.org)

Ferrero

Francesco Tramontin, Vice President Group Public Policy Center and EU Institutional Affairs (Francesco.Tramontin@ferrero.com)

The Hershey Company

Tim McCoy, Director, Cocoa Partnerships (TMcCoy@hersheys.com)

International Cocoa Initiative

Sarah Dekkiche, Director of Policy and Partnerships (s.dekkiche@cocoainitiative.org)

Mars Wrigley

Louisa Cox, Senior Director of Public Affairs Sustainable Sourcing (louisa.cox@effem.com)

Mondelēz International

Virginie Mahin, Global Head of Social Sustainability & Stakeholder Engagement (Virginie.Mahin@mdlz.com)

Nestlé

Paolo Giro, European Affairs Advisor (Paolo.Giro@be.nestle.com)

Rainforest Alliance

Wendy Schutte, Senior Manager Advocacy (wschutte@ra.org)

Solidaridad

Suzan Yemidi, Senior Cocoa Policy Adviser (suzan.yemidi@solidaridadnetwork.org)

Tony's Chocolonely

Paul Schoenmakers, Head of Impact/Impactus Prime (pauls@tonyschocolonely.com)

Unilever

Cintia Vega, Lead for Cocoa & Vanilla Sustainability (Cintia.Vega@unilever.com)

VOICE Network

Antonie C. Fountain, Managing Director (antonie@voicenetwork.eu)