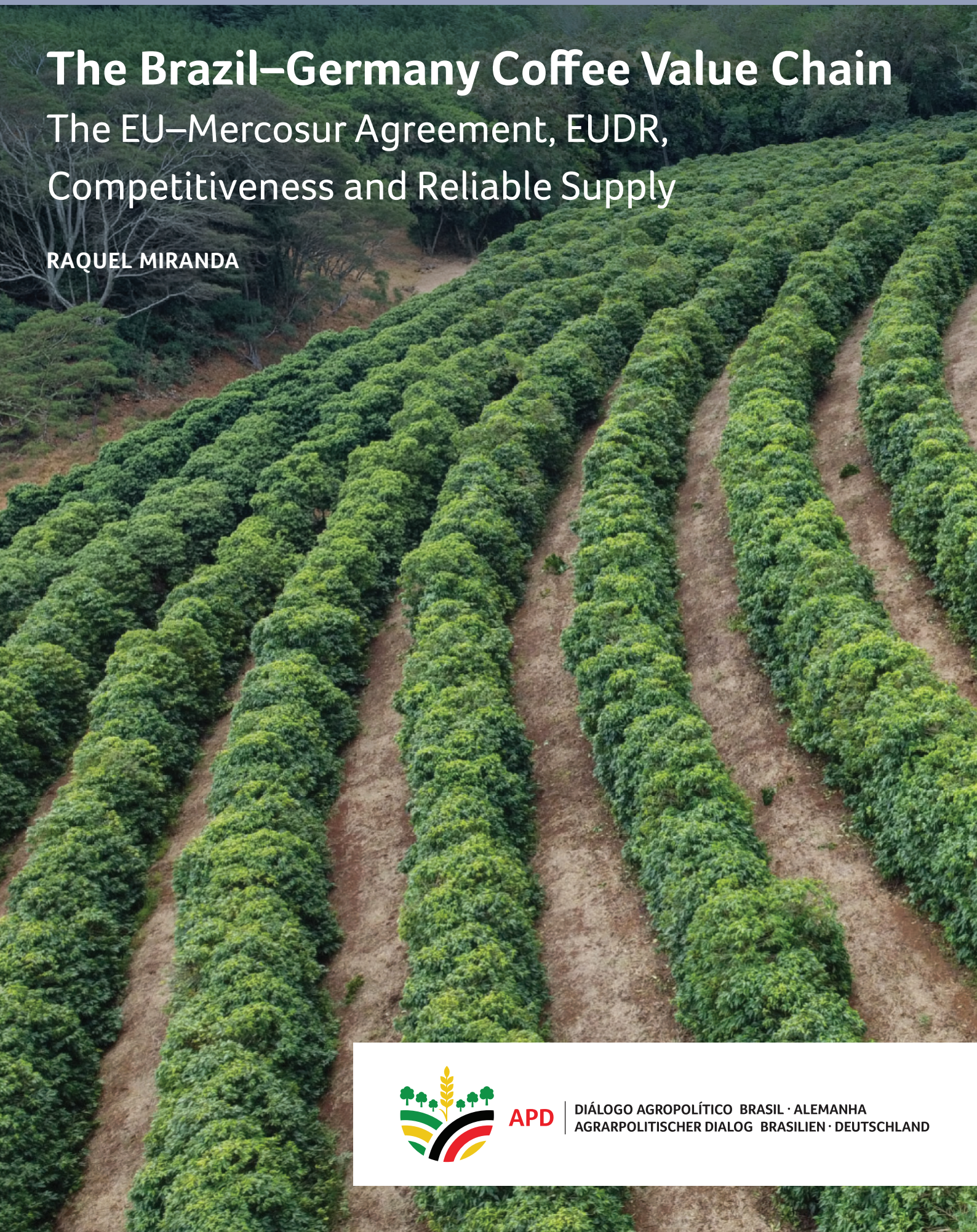
AGRICULTURAL POLICIES IN DEBATE

The Brazil–Germany Coffee Value Chain

The EU–Mercosur Agreement, EUDR, Competitiveness and Reliable Supply

RAQUEL MIRANDA



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Brasília, October 2026.

ABOUT THIS STUDY

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Executive Summary

Brazil and Germany hold complementary yet asymmetrical roles across the global coffee value chain. Brazil combines production scale, diversity of origins, and exporting capacity, while Germany depends on the import of raw materials and concentrates trade, processing, branding, and distribution functions. Given the changes in the European market access rules, this study discusses the following main question: how do the EU-Mercosur Agreement and the Regulation on Deforestation-free Products (EUDR) affect competitiveness, costs, value distribution, and supply reliability in the Brazil-Germany coffee chain, and which bilateral cooperation opportunities arise from this new scenario?

The EU-Mercosur Interim Trade Agreement, provisionally applied since May 1, 2026, sets out rules to expand and facilitate trade between the two blocs, including through the phasing-out of import duties. For green coffee, the European duty was already zero; therefore, there is no extra tariff gain. This change is particularly consequential for roasted coffee and for soluble coffee, whose base rates of 7.5% and 9%, respectively, will be phased out by 2030. Industry processing and value addition opportunities in Brazil will then depend not only on tariff preferences, but also on the competition grounds on the European Union (EU) side.

Regulation (EU) 2023/1115 (EUDR)'European Union Deforestation Regulation' has been adopted unilaterally by the EU to stop the marketing of listed products associated with deforestation after December 31, 2020, or produced in violation of the applicable legislation in the country of origin. For coffee, its application requires traceability back to the production plots, geolocation, and information that allows EU operators to conduct due diligence and assess risks. The EUDR is neither part of the EU-Mercosur Agreement nor is it a condition created by it: both instruments are legally independent, even though their economic effects are connected at the level of trade relations. For green and roasted coffee, the obligations will generally apply as of December 30, 2026, with specific transitions according to each operator. Instant coffee was included in the EUDR scope through a regulatory amendment made in 2026, with application as of December 30, 2027.

The main finding regarding the EUDR Readiness is that it cannot be uniformly attributed to Brazil. The ability to demonstrate compliance depends on the farmers being integrated into organized supply chains, the quality of data production, and the engagement of cooperatives, exporters, and industries in efforts to connect farms, deliveries, production lots, and documents. Brazilian public and private systems represent a significant framework, but interoperability, verification, inclusion of less structured suppliers, and cost distribution represent a significant lingering challenge. The interviews conducted by the author indicate that there may be commercial compensation for additional traceability services, but it is neither universal nor guaranteed by the regulation.

The tariff reduction under the EU-Mercosur Agreement tends to offer more immediate opportunities for instant coffee, for which Brazil already has a competitive export industry in place, than for roasted coffee, whose expansion will entail overcoming logistics, brands, and consumer-access barriers. For Germany, the issue goes beyond prices and tariffs: Brazil is a key source of green coffee, and reliable supply depends both on physical supply and on the availability of production lots capable of meeting regulatory requirements in a scenario of climate risks and competition among buyer markets.

The main opportunity for bilateral cooperation resides at the intersection of these stakes. Germany needs reliable suppliers capable of demonstrating compliance; Brazil seeks to preserve market access, avoid exclusion due to compliance costs, increase productivity and resilience, ensure that its systems are effectively used, and increase value capture at the origin. A bilateral agenda can combine data interoperability, capacity building through cooperatives and associations, technical assistance, climate adaptation, financing, long-standing trade relations, and value-addition projects.

1. Introduction

1.1. Background and Research Question

The history of coffee in Germany predates the establishment of bilateral trade: since the 17th century, coffee has been found in German cities, but coffee produced in Brazil first gained relevance in German ports in the first decades of the 19th century. This trade flow gained strength notably between the 1840s and 1860s, especially through the Hamburg and the Bremen maritime ports that brought the production origins closer to the markets of Central Europe. These trade relations have evolved over time. Brazil currently offers scale and diversity of Arabica and Canephora coffee, while Germany imports, stores, trades, roasts, processes, distributes, and re-exports coffee (Fenner, 2013).

The complementary relations of the two countries coexist with the uneven distribution of consumer-connection functions. Brazil stands out primarily as the origin of green coffee, while a significant portion of roasting, blending, packaging, branding, and marketing tasks remain in the hands of consumer markets. Understanding this structure is key to assessing the extent to which reducing tariffs on processed coffee may increase value capture in Brazil.

Two recent changes add particular relevance to this issue: the EU-Mercosur Interim Trade Agreement phases-out import tariffs for processed products, while the EUDR, a European regulation that is separate from the Agreement, introduces traceability, legality, and due diligence requirements for the products listed. The combination of these effects can modify costs, trade relations, and investment decisions, without wiping out the structural advantages of each country.

This study examines who stands to benefit from tariff liberalization, who bears the compliance costs, and how these changes may affect competitiveness, the reliability of German supplies, and bilateral cooperation.

1.2. Sources and Method

This research study is based on a comprehensive analysis of the EU-Mercosur Interim Trade Agreement, with emphasis on chapters 2, 3, and 18, and Annexes 2-A, 3-B, and 18-A, and the consolidated version of Regulation (EU) 2023/1115 (EUDR), including all further amendments and acts. The Guidance document for Regulation (EU) 2023/1115 on deforestation-free products (Guidance, C/2026/3896), which clarifies concepts and procedures, and the document Implementation of the EU Deforestation Regulation – Frequently Asked Questions (FAQ), which compiles official answers to practical questions, were also reviewed. This analysis uses historical series from 2015 to 2025, with data from the Federal Statistical Office of Germany (Destatis), Comex Stat (the Brazilian foreign trade statistics system), *Conselho dos Exportadores de Café do Brasil* (Brazil's Coffee Exporters Council — Cecafé), *Companhia Nacional de Abastecimento* (Brazil's National Supply Entity — Conab), and *Instituto Brasileiro de Geografia e Estatística* (the Brazilian Institute of Geography and Statistics — IBGE). Interviews with representatives from Cecafé, *Cooperativa Regional de Cafeicultores em Guaxupé* (Regional Cooperative of Coffee Growers in Guaxupé — Cooxupé), and *Cooperativa dos Cafeicultores do Cerrado* (Cooperative of Coffee Growers of the Cerrado — Expocacer), in addition to written responses from *Associação Brasileira da Indústria de Café Solúvel* (Brazilian Association of the Soluble Coffee Industry — ABICS), offer qualitative perspectives that neither constitute a statistically representative sample nor replace official sources.

Brazil's share in the origins of German imports is measured primarily by Destatis; the importance of Germany among Brazilian export destinations is tracked by ComexStat and Cecafé. I The country through which coffee is exported is not necessarily the country where most of the economic value is generated through processing, trading, and distribution.

: purchases made by German groups may enter the EU through other ports, and German imports may go on to re-export.

Additionally, the difference between the value of green coffee and the price of processed products should not be interpreted as a margin readily appropriated by the industry. Processing involves physical loss, financing, logistics, packaging, marketing, distribution, and marketing risks. . Therefore, this study examines the different stages of the coffee value chain without assigning specific shares of economic value to each stage, as the available statistics do not allow for such estimates.

2. Brazil-Germany Value Chain

2.1. Brazilian Production and Supply Structure

Brazil is at the core of the global coffee supply, combining productive scale, territorial diversity, and the ability to provide different quality standards. Coffee farming is present in 16 of the 26 Brazilian states across the country's five major regions, which present diverse climate, altitude, topography, and soil conditions. Coffee is grown across four of the six Brazilian biomes — the Atlantic Forest, the *Cerrado*, the Amazon, and in the *Caatinga*. This reflects the environmental diversity of the producing regions. Production primarily includes two species: *Coffea arabica* (*Arabica*) and *Coffea canephora* (*Conilon* and *Robusta*). Their characteristics meet the demands of different markets and industrial applications, especially the blending, and roasted and soluble coffee manufacturing industries.

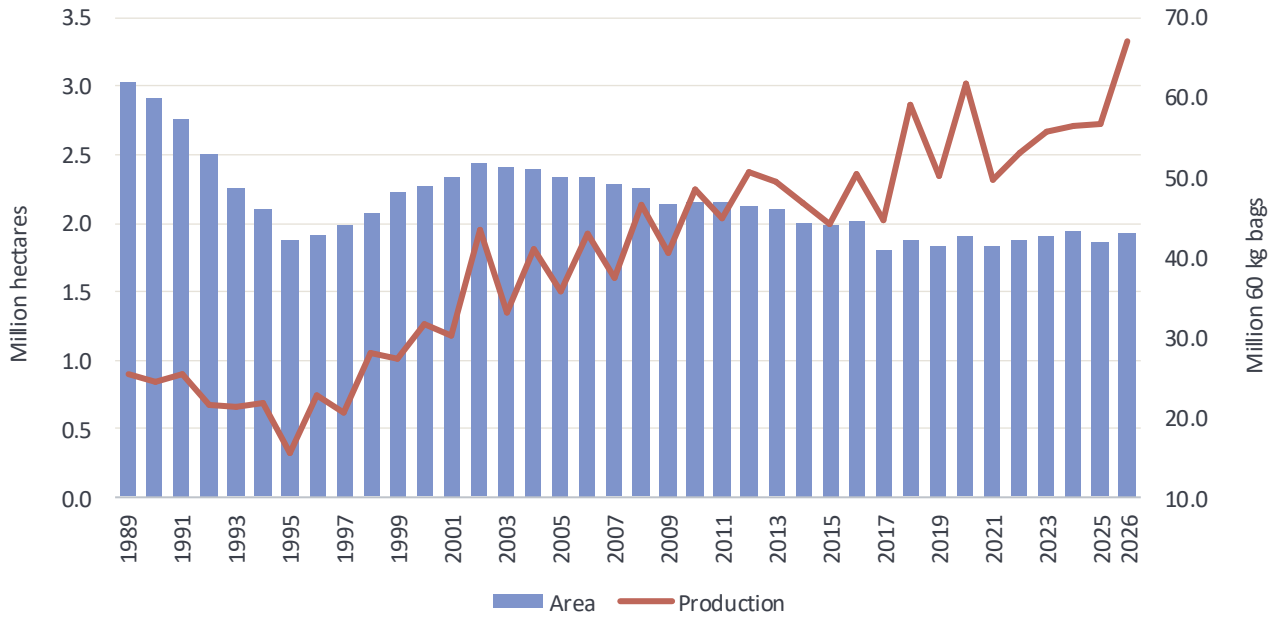
According to Brazil's *Conselho Nacional do Café* (National Coffee Council — CNC), coffee farming involves roughly **330,000 farmers**. Of these, around 78% are smallholders distributed across some **1,983 municipalities**. This diverse production structure plays a key role in the creation of employment and income, and in territorial development, especially where the local economy is strongly related to coffee farming.

Over the past decades, coffee farming in Brazil has been significantly transformed by research, genetic improvement, the introduction of new cultivars, and the modernization of management approaches. According to historical data from *Instituto Brasileiro de Geografia e Estatística* (Brazilian Institute of Geography and Statistics — IBGE), between 1989 and 2026, coffee farmlands declined by 36.1%, from approximately 3 million to 1.9 million hectares. During the same period, the Brazilian production of Arabica and Canephora coffee increased 162.8%, from 25.5 million to an estimated 67 million 60 kg sacks. Average productivity rose about 311%, from 8.42 to 34.62 sacks per hectare.

Although production fluctuates annually due to climate conditions and the biennial nature of coffee plants, this demonstrates the industry's ability to increase supply without expanding the total cultivated area. Productivity gains also point to the potential of

technological innovation to promote more efficient land use and reduce pressure for agricultural expansion, which is particularly relevant for the sustainability of the supply chain. However, this does not eliminate the need to demonstrate that coffee farms comply with environmental requirements.

Figure 1 – Comparison of Production Area and Coffee Volumes Produced in Brazil from 1989 to 2026



Source: IBGE, historical series of cultivated area and production; prepared by the author. Note: Total production of Arabica and Canephora, expressed in 60 kg sacks. Estimated 2026 data.

Supply chain organization is also crucial for meeting the EUDR requirements. Coffee reaches international markets via different routes, ranging from farmers engaging in direct trade to cooperatives, intermediaries, exporters, and traders. Over these paths, the coffee beans are received, sorted, stored, and often combined into commercial lots from different farms. The traceability required by the EU market means that these operations should be tracked to identify and document the origins of all the coffee that is part of each lot.

This structure helps to explain why production capacity and readiness for the EUDR are not necessarily equivalent. Although Brazil has a well-established export chain, the ability to gather, verify, and share geospatial, environmental, and trade information depends on how each farmer is integrated into the supply systems. Even productive and

technically efficient farms may struggle when they lack access to organized registration, traceability, and technical support structures. Against this backdrop, cooperatives and exporting companies play a key role in enabling compliance and minimizing the risks of trade exclusion.

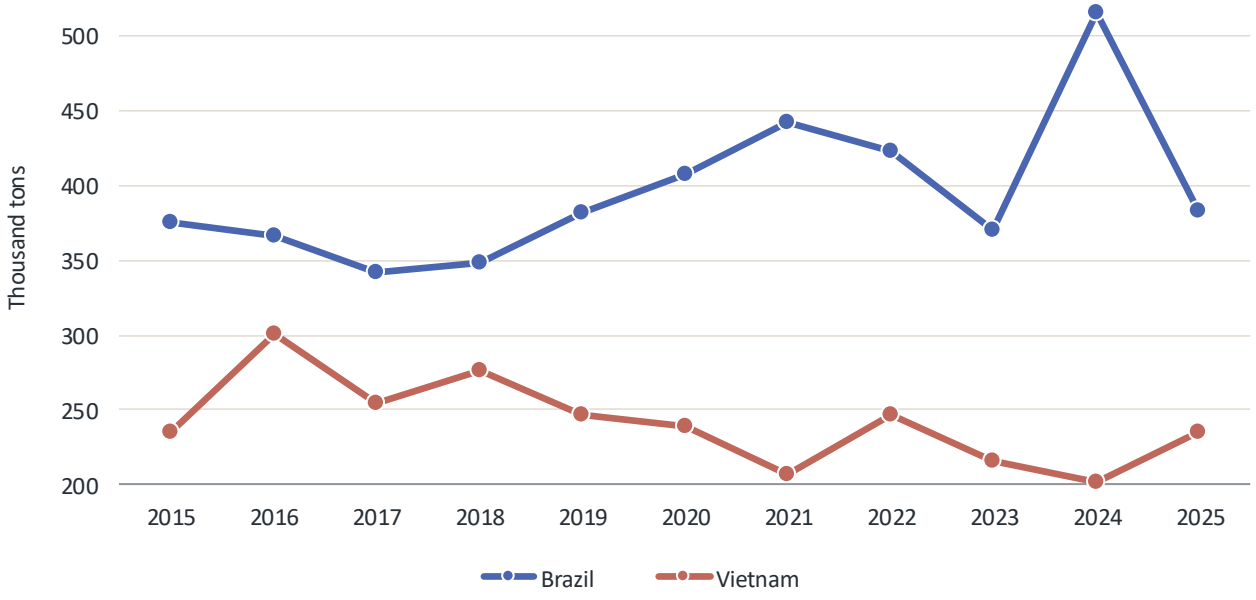
2.2. Germany as a Market and an Industrial Hub

Germany relies on coffee imports to meet domestic demand and supply its coffee-processing industry. Around these imports, the country has developed a well-established sector encompassing trading, storage, decaffeination, roasting, instant coffee production, branding, financing, and distribution. As a result, imported coffee is not only consumed domestically but also processed, traded, and re-exported, generating additional economic value in Germany.

According to *Deutscher Kaffeeverband* (the German Coffee Association), around 456,000 tons of roasted coffee were sold in the German market in 2025, generating revenues of €8.98 billion. In addition to its significant consumer market, Germany plays a relevant role as a coffee processing, distribution, and export hub. The International Trade Centre's ITC Trade Map reports that German coffee exports, including products under tariff heading 0901, amounted to **US$5.41 billion in 2025**, compared to US$3.81 billion in 2024, accounting for a 41.8% increase in value. These figures show Germany's importance both as a destination for Brazilian coffee and as an industrial and commercial hub integrated into the supply of other EU and global markets.

Germany imports over one million tons of green coffee annually, and Brazil holds a central position in this market. The comparison between Brazil and Vietnam — the two most significant recent origins — simultaneously demonstrates Brazil's importance and Germany's diversification strategy.

Figure 2 – German Imports of Non-Decaffeinated Green Coffee: Brazil and Vietnam, 2015–2025



Source: Destatis/GENESIS, NC 09011100; prepared by the author. Amounts expressed in thousand tons.

In 2025, Germany imported around 383,100 tons of non-decaffeinated green coffee from Brazil and 235,600 tons from Vietnam (Destatis 2025). Brazil remains the main individual source, although the relative shares fluctuate according to price, harvest, and demand mix.

Germany's economic influence in the supply chain is greater than direct imports reveal: companies based in Germany can order volumes delivered to other EU countries, while coffee registered at the German border can be processed and re-exported. These flows should not be confounded with an estimate of the value effectively appropriated by Germany.

This structure creates cumulative advantages. A German coffee roaster does not compete on manufacturing costs alone: he benefits from near-market inventory, knowledge of consumer preferences, connections with retail chains, the ability to launch products, intra-European logistics, and established brands. For a Brazilian company that intends to export processed coffee, tariff elimination reduces a border disadvantage, but does not replace those assets. That is why the effects of the Agreement should be evaluated separately for roasted and soluble coffee, rather than as a generic liberalization of "coffee."

2.3. Product Flows and Industrial Destinations

Trade data reveal a striking asymmetry across the Brazil-Germany coffee value chain. In 2025, Brazil accounted for around 34.3% of the total volume of non-decaffeinated green coffee imported by Germany, and established itself as its main single supplier. In contrast, its share in the German imports of non-decaffeinated roasted coffee was only 0.04%. This difference represents Germany's strong industry and the trade barriers faced by Brazil's processed coffee, including established brands, access to retail chains, logistics of end products, and the competitive advantages of consumer-near processing.

Regarding extracts, essences, and concentrates of coffee (CN 21011100), Brazil's estimated share in the German imports was 6.25% in 2025, compared to less than 0.04% for non-decaffeinated roasted coffee (CN 09012100). Therefore, talking about "processed coffee" without differentiating its segments does not reveal varying trade opportunities.

ABICS' historical series reveals an important geographical shift in soluble coffee earmarked for the current EU27: Germany accounted for 53% of the Brazilian volume shipped to these countries in 2000, and for 12% in 2025, while Poland accounted for approximately 37%. This reveals a diversification of export destinations, not necessarily an equivalent loss of economic activity by German companies in the EU supply chains (ABICS, 2026).

The shift in flows to Poland and the Netherlands calls for a distinction between customs destination and final product destination. ABICS sees some headroom to restore trade relations with German companies through bulk supply, bottling, joint development, and distribution, without assuming that the whole processing function must migrate to Brazil (ABICS, 2026).

3. EU-Mercosur Agreement: Varying Impacts on Coffee

3.1. What Changes in the European Market Access Conditions

The EU-Mercosur Interim Trade Agreement phases out EU tariffs on goods originating from Mercosur. For coffee, the Agreement is unevenly applied: green non-decaffeinated coffee beans entered the EU duty-free, while roasted and instant coffee tariffs made the Brazilian goods more expensive compared to competitors with preferential access. The most relevant change, therefore, does not lie in the main flow of green coffee, but in the possibility of selling processed goods under more favorable tariff conditions.

Tariff elimination will follow the staging schedule outlined in Annex 2-A of the Agreement. For coffee products under category 4, tariff reduction occurs over five stages: one in the provisional application of 2026 and others in January 2027, 2028, 2029, and 2030. The benefit is not automatic: it depends on the goods complying with the preferential rules of origin set out in chapter 3 and in Annex 3-B. The table below summarizes the conditions applicable to the main segments, distinguishing this customs requirement from the EUDR obligations, which arise from an independent EU legislation.

Table 1 – Tariff and regulatory framework of the main coffee codes.

Product	EU Code	EU Base Rate	Staging	Rule of Origin - Summarized	EUDR
Non-decaffeinated green coffee	0901 11 00	0%	Category 0; no further reduction	Wholly obtained when grown/ harvested in Brazil; CTH for non-originating materials	Yes
Decaffeinated green coffee	0901 12 00	8.3%	Category 4; zero by 2030	CTH	Yes
Non-decaffeinated roasted coffee	0901 21 00	7.5 %	Category 4; zero by 2030	Non-originating materials from Chapter 9 <= 60% of the weight	Yes

Product	EU Code	EU Base Rate	Staging	Rule of Origin - Summarized	EUDR
Extracts, essences and concentrates of coffee (main code for soluble coffee)	2101 11 00	9%	Category 4; zero by 2030	CTH + non-originating materials of heading 09.01 <= 50% of EXW	Yes, as of December 30, 2027

Sources: EU-Mercosur Interim Trade Agreement, Annexes 2-A and 3-B; EUDR, and Delegated Regulation (EU) 2026/2102

Note: Change of Tariff Heading (CTH) requires that non-originating materials used in manufacturing be classified under a different heading than that of the final good, considering the first four digits of the Harmonized System (HS). This requirement may be accompanied by additional conditions, according to the rule of origin applicable to each good.

3.2. Green, Roasted, and Instant Coffee: Varying Trade Effects

Green non-decaffeinated coffee (CN 0901 11 00) remains with 0% import duty. The Agreement does not directly change the customs cost of this flow, which accounts for most of Brazil-Germany's trade relations. The case for decaffeinated green coffee (CN 0901 12 00), which is less commercially representative, is different: its 8.3% base rate will be progressively eliminated. It is therefore important to avoid the generic statement that all green coffee was already duty-free.

For non-decaffeinated roasted coffee (CN 0901 21 00), the 7.5% base rate falls to 6% in 2026, 4.5% in 2027, 3% in 2028, 1.5% in 2029, and zero in 2030. This tariff reduction improves the relative entry price of Brazilian roasted coffee, but does not by itself resolve the barriers beyond customs. Established brands, contracts with retailers, logistics of end products, inventory management, and closeness to the consumer continue to favor the German-based industry. Brazil's potential tends to be greater in specialty coffees, private labels, business-to-business transactions, and collaborations with distributors.

Instant coffee presents a more immediate opportunity for trade expansion. For extracts, essences and concentrates (CN 2101 11 00), the 9% base rate falls to 7.2% in 2026, 5.4% in 2027, 3.6% in 2028, 1.8% in 2029, and zero in 2030. Unlike roasted coffee, Brazil has an export industry that operates on a global scale and well-established trade relations in this segment. According to ABICS, this preference could increase competitiveness in industrial inputs, bulk supplies, freeze-dried products, and private labels, including through cooperation with European companies. However, eliminating nine percentage points on the tariffs does not necessarily lead to an increase in the manufacturer's margins: the actual benefit will depend on contracts, competition, and on the prices charged.

3.3. Rules of Origin: Processing in Brazil Alone is not Sufficient

Preferential origin determines whether the product is eligible for reduced tariff. Coffee grown and harvested in Brazil qualifies as a wholly obtained product. For roasted coffee under subheadings 0901.21–0901.22, Annex 3-B allows non-originating materials under Chapter 9 up to 60% of the final weight. For extracts, essences and concentrates under subheadings 2101.11–2101.12, a change of tariff heading (CTH) is required and the value of non-originating materials under heading 0901 is capped at 50% of the ex-works (EXW) price. Therefore, it cannot be said that all raw materials for instant coffee must necessarily be either Brazilian or from Mercosur.

These rules require documentary controls, but they do not appear to represent a structural hurdle for most of the Brazilian industry, which predominantly uses domestic coffee. Foreign trade data report a negligible share of imported green coffee in Brazilian supply, although companies using foreign materials need to verify compliance with the rule on an individual basis. Annex 18-A of the Agreement makes room for cooperation in sustainability and traceability, and for the evaluation and utilization of information from the systems of Mercosur countries when consistent with European legislation. This fosters technical dialogue, but it does not mean the automatic recognition of Brazilian platforms by the EUDR.

4. EUDR: Coffee Supply Chain Obligations and Responsiveness

4.1. Scope, Schedule, and Market Access Conditions

The EUDR, established by Regulation (EU) 2023/1115, is a legal requirement for access to the EU market, and is separate from the EU–Mercosur Agreement. In the coffee industry, it covers heading 0901, including green and roasted coffee beans. Its general application takes effect on December 30, 2026 for medium and large operators and, as a rule, on June 30, 2027 for micro and small operators, subject to the exceptions provided in the regulation. Delegated Regulation (EU) 2026/2102 added coffee extracts, essences, and concentrates (CN 2101 11 00) to Annex I. These inclusions will only take effect on December 30, 2027.

Article 3 establishes three cumulative conditions: the goods must be deforestation-free, produced according to the relevant legislation of the country of production, and be covered by the declaration of due diligence required where applicable. The cutoff date for forest conversion is December 31, 2020. For Brazilian coffee, this requires evidence regarding the cultivated areas and their connection to the coffee sold; fulfilling only one of the conditions does not supersede the others. The EUDR is not a voluntary certification. The European concept of forest does not automatically cover the entire native vegetation in Brazil.

4.2. From the Production Plots to the Land: Traceability and Legality

Traceability starts at the coffee production plot, not at the port of shipment. The EUDR requires geolocation of information for plots and production; in specified situations, polygon mapping is required. When different producers deliver coffee to the same warehouse, cooperative, exporter, or industry, all properties and plots that contributed to the lot shipped to the EU must remain identifiable and associated with the traded goods.

This changes the way information is organized; it does not prohibit the commercial blending of coffees. A lot may include various producers, classified by quality, type or destination, provided that the records allow the relevant origins to be traced back. The challenge is to connect supplier registrations, production plots, proof of delivery, receipts, inventories, blend composition, and exported lots. The physical identity of each coffee bean does not need to be preserved after blending; the documentary link does. Materials of unknown origin cannot be simply incorporated into a lot and considered traceable.

This effort equally covers manufacturing companies, private buyers, traders, and exporters, and cooperatives. In the industry of instant coffee, the raw material loses its physical identity in processing; therefore, controls over purchases, incoming goods, inventory, and industrial campaigns need to maintain consistency between the origins and the final lots. The more integrated this workflow is with the management systems used by the companies, the less need there is for parallel manual checks.

Under the EUDR, compliance also involves the Brazilian production legislation: land use, environmental protection, labor rights, third-party rights, and other areas set out in Article 2, item 40. Brazil's Rural Environmental Registry (CAR), deforestation maps, and certifications can provide useful evidence, but no single document fully demonstrates legality and the absence of deforestation. The European Commission's 2026 Guidance document (Guidance, C/2026/3896), previously presented in the methodology of this study, along with its FAQs, offer interpretative clarifications for evaluating documents and proportionate risks; they do not replace the text of the regulation.

4.3. Due Diligence, Statement, and Responsibilities

. Due diligence is the process of assessing and mitigating risks before a product is placed on the EU market. Articles 8 to 11 outline three stages: gathering the necessary information, assessing the risk, and, when the risk cannot be considered non-existent or negligible, adopting mitigation measures. The Due Diligence Statement (DDS) is submitted after this process, according to the applicable obligations. Solely entering coordinates into a platform does not mean that the due diligence has been completed.

Brazilian farmers, cooperatives, agricultural companies, exporters, and industries can collect data, verify suppliers, and build a history for each lot, but this does not automatically

transfer legal responsibility for complying with the EUDR. In a typical import operation, the operator established in the EU must assess the sufficiency and reliability of the information and take on the applicable regulatory obligations. If a Brazilian company or cooperative markets its goods through a European subsidiary that places them on the EU market, the assignment of responsibilities should be analyzed in light of this operation and the legal entity involved.

The operator needs to consider registration inconsistencies, evidence of deforestation, documentation of legality, the supply chain's level of complexity, and the potential blending with coffees of unknown origin. When the evidence does not support the required conclusion, additional information or mitigation measures should be sought before submitting the statement. This distinction of who produces the evidence and who takes on the EU obligation is key to understanding who may have to finance the systems, which will be examined in further detail in Chapter 5 below.

4.4. Risk Classification and Effective Use of Brazilian Systems

Implementing Regulation (EU) 2025/1093 is the act by which the European Commission issued the first list of countries classified as low or high risk for the purposes of the EUDR; the others remain under the standard risk category. Brazil is classified under standard risk. This is an evaluation by country or part of a country rather than a specific classification of Brazilian coffee. Therefore, the Brazilian origin neither automatically allows resorting to the simplified due diligence reserved for low-risk countries, nor does it mean that a particular production plot or lot has a high risk.

Brazil has the following complementary instruments: CAR/SICAR, PRODES/TerraBrasilis, SeloVerde MG, Agro Brasil + Sustentável, Parque Cafeeiro from Conab, and sectoral solutions for supplier analysis. They can support registrations, territorial monitoring, and the organization of evidence, without constituting an EUDR certification in themselves. A practical obstacle is not only the existence of reliable data, but its technical acceptance and effective use by the EU buyers.

When the importers require the same supplier to use their own platform without being able to utilize the documentation and records produced in the Brazilian systems, re-registrations, repeated checks, and avoidable costs escalate. . Cooperation should focus on

developing common standards for assessing evidence, shared data formats, channels for exchanging information, and validation procedures. This would allow the same reliable information to be used by multiple buyers, reducing duplication of work for suppliers.

This interoperability neither implies automatic legal recognition nor indiscriminate transfer of territorial or trade data.

4.5. EUDR Readiness: Unequal Capabilities Across Chains

Brazil's readiness for the EUDR does not allow for a binary response, such as "the country is ready" or "it is not ready." In this study, readiness is the ability to transform production information into evidence that is verifiable and usable for the EU operators. It depends on accurate geolocation and documentation, and on systems capable of linking production plots, delivery, storage, lot, and buyers.

Interviews conducted with Cecafé, Cooxupé, and Expocacer representatives reveal installed capacity and upfront investments in organized export segments, but do not statistically represent the entire industry. Producing companies, private exporters, smaller cooperatives, and independent farmers may rely on very different tools and resources. Two environmentally compliant entities may have unequal conditions of access to the EU market as a function of the quality of the technical and commercial support available to them.

Table 2 – Qualitative Framework of EUDR Readiness by Chain Link.

Link	What Characterizes Readiness	Assets	Point of Attention
Farmer	Identify plots and maintain consistent information/ documents	CAR, technical assistance, cooperatives, public tools	Single farmers; individual cost of adaptation
Cooperative	Connect cooperative member, plot, delivery, and lot	Registrations, receipt, storage, technical assistance	Full coverage and physical-digital integration
Exporter/trader	Consolidate origins, check consistency, and submit evidence	Exporting experience, controls and sectoral platforms	Upstream data; multiple buyer formats
Brazilian industry	Preserve origin through processing and blending	ERP, quality, inventory control	Multiple origins and loss of the coffee beans' physical identity

Link	What Characterizes Readiness	Assets	Point of Attention
European operator	Assess risk and make market placement decisions	Contractual relationship and information received	Responsibility for evidence sufficiency and reliability
Public/sectoral infrastructure	Provide reliable and interoperable data	CAR/SICAR, PRODES,	Data standardization, updating, reutilization, and governance

Source: prepared by the author based on regulatory requirements and interviews; it does not represent statistical classification.

The 2017 Agricultural Census by IBGE reveals the relevance of smaller coffee farms in Brazil, but it does not report how many farmers are aware of or are capable of complying with the EUDR in 2026. This is an important differentiation: it is not required that every smallholder master all the legal steps of the regulation. Instead, that must submit accurate data and have access to structures to organize, verify, and transmit such data. The compliance capacity can be shared by cooperatives, associations, or exporting companies.

The main risk of exclusion arises when the fixed cost of registering, verifying, and tracking a small supplier is high compared to the volume traded, even if their coffee is environmentally compliant. The readiness frontier is therefore predominantly organizational: it is important to determine where the coffee is produced, and how the goods carry the data up to the buyer.

5. Agreement and EUDR: Distribution of Benefits and Costs

5.1. Tariff preference only creates value when it can be used

The preferential origin of the Agreement and the geographical origin required by the EUDR address different concerns. The former determines whether a product manufactured in Brazil is eligible to the reduced tariff; the latter allows to identify components of the raw material and demonstrate zero deforestation, legality, and due diligence. An industry can comply with the customs' rule of origin and still lack EUDR evidence. Conversely, regular coffee for the EUDR does not automatically acquire preferential tariff origin. The trade benefit depends on managing these two requirements simultaneously.

The effects of this interaction vary: for non-decaffeinated green coffee, there is no further tariff reduction, and the cost of preserving market access prevails; for roasted coffee, the lower tariff opens up selective opportunities, but brands, retail, logistics barriers still stand; for instant coffee, tariff reduction from 9% to zero may favor an export-oriented Brazilian industry, provided that traceability can be integrated into purchases and industrial lots. This is not about immediate gains, but about trade conditions that companies can explore.

5.2. Who absorbs the cost of compliance and who reaps the benefits?

The economic distribution of EUDR costs is one of the main concerns in the relationship within the Brazil-Germany coffee production chain. EU operators have specific legal responsibilities, but the investments needed to produce the evidence are often made long before imports, at the farm, cooperative, exporter, or at an industry level. The key components include specialized teams, georeferencing, environmental verifications, handling image inconsistencies, field visits, traceability systems, information technology interfaces, document updates, and attaching receipts to commercial lots. These are implementation and ongoing operation costs, not just the cost of issuing a document.

The experience reported by Cooxupé illustrates the economic role of an intermediary entity: it reported directly absorbing the costs of structuring and maintaining traceability, without charging its members any additional individual fees, and negotiating with buyers compensation for providing this service, which can help to cover operating costs and indirectly impact cooperative results. Expocacer also described collective traceability and monitoring services. These experiences do not exactly mean that all cooperatives, private companies, or independent farmers rely on the same financing model; Cecafé noted that it does not have a systematic survey of the costs borne by exporters and importers.

It is necessary to separate coffee prices, compensation for additional services, and compliance costs. The EUDR does not set a price premium for the farmers, and, when compliance becomes a precondition for market entry, coffee prices do not need to go up. However, in specific trade relations, buyers may pay for documentation or traceability services. Those who are able to negotiate this compensation, have expenses covered, or spread them over large volumes have an advantage; those who lack this negotiating power may absorb additional costs with reduced margins. The benefit of tariff preference can be appropriated in different proportions by the exporter, importer, the industry, or the consumer, according to the contracts and the competition.

The multiplication of platforms individually required by EU buyers exacerbates the problem: the same farmer may have to pay for redundant registrations, assessments, and audits. Interoperable systems and shared criteria for accepting evidence may reduce this cost without weakening verification. From a bilateral perspective, the goal is not to assume an all-inclusive premium for compliant coffee, but to sustainably distribute investments to preserve supply and avoid that technically competent suppliers are excluded due to an inability to bear fixed costs.

5.3. Added Value: Industrial Opportunity and Market Limits

For instant coffee, the new tariff conditions may favor B2B contracts, ingredients, private labels, and production collaborations between Brazilian and German companies; in some cases, manufacturing at the origin could increase the share of value created in Brazil. For roasted coffee, coffee's greater sensitivity to time and logistics, established distribution networks, and the strength of European brands suggest selective strategies, including specialty coffees and trade alliances. In both cases, expanding processed

exports will require investment, market positioning, and regulatory integration, not just duty exemption.

6. Germany and Supply Reliability

6.1. Import Dependence and Diversification

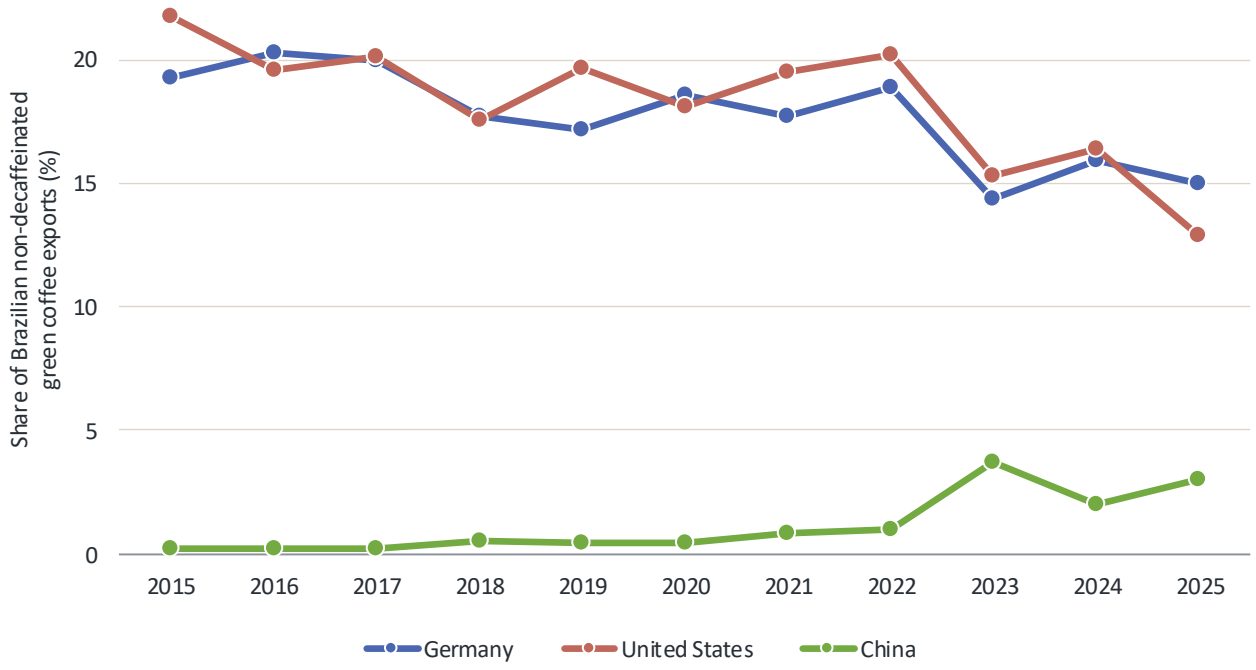
For Germany, coffee is a commodity that is structurally and, at the domestic production level, necessarily imported. Supply reliability does not mean self-sufficiency, but rather continuity of volume, quality, and diversity for consumption, roasting, manufacturing, and re-export. Brazil is the main single source of green coffee imported by Germany and a strategic partner due to the scale and diversity of its supply.

Exposure does not equate to exclusive dependence. Germany combines Brazilian supply with other sources, including Vietnam, Honduras, Colombia, and others. Diversifying suppliers remains a rational approach considering price variations, blend profiles, and climate shocks. Still, quickly replacing the entire Brazilian supply without altering quality, cost, or availability would not be a trivial matter.

6.2. International Competition, Climate and Supply Capacity

Germany competes for Brazilian coffee with the United States, other European countries, and expanding Asian markets. In 2025, Cecafé identified Germany as the largest single destination for Brazilian shipments, reporting approximately 5.41 million sacks. The future distribution of supply will also depend on relative prices, trade relations, and requirements of access to different markets. Droughts, hot weather, frosts, the biennial nature of Arabica coffee, and cultivation costs can affect harvests and quality, requiring investments in productivity and climate adaptation at the origin.

Figure 3 – Destinations for Brazilian green coffee: Germany, United States, and China, 2015–2025.



Source: ComexStat, NCM 09011110; 2015–2025; net weight. Single destinations not grouped into regional blocs.

The interpretation is not that China will replace Europe in the short term. The difference in scale is still significant. A strategic consideration is that Brazilian farmers and exporters have a growing number of market alternatives. During periods of tighter supply, the relative attractiveness of price, relations, trade risk, and regulatory requirements influence the allocation of coffee to multiple destinations.

6.3. Regulatory Friction versus Supply Shortages

The EUDR can produce a twofold effect. In the short term, documentation-related requirements may diminish the pool of immediately usable suppliers, even without a decline in physical supply. In the long term, more transparent supply chains can improve risk assessment, purchase planning, and business continuity. It is necessary to distinguish the risk of lot retention or supplier change from a stronger assumption of widespread supply shortages.

Reports gathered from Cecafé, Cooxupé, and Expocacer reveal proactive readiness within organized export chains, with integrated registrations, socio-environmental analyses,

and composition of lots. From this evidence, it cannot be concluded that independent farmers, smaller cooperatives, or all intermediaries exhibit the same level of readiness. Additionally, it cannot render an estimation of a domestic coffee share under the EUDR.

This study does not present sufficient evidence to predict widespread shortages in Germany due to the EUDR. The most plausible risk is trade friction: costs, inconsistent verification systems, shipment delays, or redirection of purchases across supply chains and destinations. Any potential increase in Brazil's market share among less prepared competing suppliers is an assumption, not a prediction, and will also depend on prices, logistics, and the compliance capabilities of other origins.

Supply reliability therefore depends on resilient production, reliable information, and stable trade relations. Regulatory documentation helps to manage risks, but it does not replace production capacity, climate adaptation, or sufficient compensation to support investments at the origin. This is a solid foundation for the bilateral cooperation examined in the following chapter.

7. Bilateral Cooperation and Recommendations

7.1. Complementary Interests and Bilateral Actions

Brazil and Germany do not have identical interests. Germany seeks raw materials in sufficient quantity, quality, and under EU-compliant regulatory conditions. Brazil seeks to preserve access to an important market, avoid the exclusion of farmers, achieve recognition and an effective use of its traceability systems, attract investment and technology, increase productivity and resilience, and expand its share in activities of higher value-added. A robust bilateral agenda must recognize these differences, identifying cooperation opportunities based on complementary interests.

Brazil's high share in the supply of green coffee to Germany, which is close to one third of the 2025 imports, makes supply reliability a strategic issue for Germany. Although the diversification of origins and a solid import and processing structure offer supply alternatives, dependence on large producing countries keeps the industry exposed to climate risks, production and price fluctuations, and potential trade restrictions. There is insufficient evidence to suggest an imminent risk of widespread shortages in Germany. However, the implementation of the EUDR may lead to potential disruptions in trade flows if difficulties with traceability, documentation, or proof of compliance temporarily prevent the marketing of certain lots to EU countries. In this scenario, the main risk would not necessarily be a physical shortage of coffee, but a decline in the supply that meets the regulatory conditions imposed by European buyers, with potential effects on costs, supplier concentration, and reliability of supply.

There are matching interests when investments at the origin simultaneously increase buyers' security and suppliers' economic capacity; when EU traceability requirements can be met with Brazilian infrastructure and systems; and when tariff preferences make room for new production, processing, and distribution models with the participation of entities from the two countries. Bilateral cooperation can therefore help to reduce

supply risks and trade exclusion by combining data interoperability, capacity building, technical assistance, climate adaptation, financing, and long-standing trade relations.

7.2. Interoperability with Data Sovereignty

The first priority is to reduce duplication. Brazil must have a multilayered data and monitoring system in place. Cooperation should focus on common interoperability criteria, safe interfaces, and the effective use of official and sectoral information, rather than create a separate structure for each buyer. Annex 18-A provides an institutional basis for presenting and evaluating Brazilian systems without creating automatic equivalence with the EUDR.

Pilot projects can test, for example, the data flow from a Brazilian cooperative to a German importer; the reutilization of polygon mapping and evidence for multiple buyers; or validation mechanisms to avoid repeat audits. Governance must respect the Brazilian General Personal Data Protection Law (in Portuguese: Lei Geral de Proteção de Dados Pessoais), ensure commercial confidentiality, and share only the data that is necessary for regulatory purposes.

7.3. Intermediary Entities and Producers

A solid opportunity for bilateral cooperation is the implementation of pilot projects on traceability and compliance with the EUDR, involving Brazilian cooperatives, associations, exporters, importers, and German industries. These projects could cover different regions and farmer profiles, supporting georeferencing, documentary organization, and integration of systems, including through interoperability between Brazilian and EU platforms.

German importers and roasters could participate in the funding of these initiatives, along with instruments of bilateral cooperation, while Brazilian cooperatives and exporters would engage in implementation and technical support to the farmers. Long-term supply contracts could support the distribution of costs and ensure the continuity of investments.

The outcomes would be evaluated according to the increase in the number of farmers included in traceability systems, reduction in compliance costs, and the maintenance of EU market access for smallholders. For Germany, cooperation would strengthen reliability

of supply; for Brazil, it would strengthen production inclusion and competitiveness in the supply chain of coffee.

7.4. Resilient Production and Decent Income

Traceability protects information, not productivity. Investments in research, genetics, soil management, mechanization, water efficiency, and climate adaptation can improve the resilience of cultivated areas. Regenerative agriculture approaches stand out when they are technically appropriate and economically viable, and associated with soil conservation, production capacity, and functional biodiversity. The priority is to yield better production results in the existing farmland.

Without sufficient income to cover costs and finance crop renewal, it is hard to bear the costs of additional production and environmental practices. Cooperation in sustainability should recognize this connection thereby avoiding the imposition of single technologies or models without proving agronomic feasibility, access to labor, and adjustment to the Brazilian realities.

7.5. Industrial Cooperation and Investment

Trade cooperation can support B2B contracts, supply of coffee extracts, private labels, joint product development, and investments in Brazilian soluble or roasted coffee plants, including from EU firms. This avenue acknowledges that the German industry has a legitimate interest in preserving its operations; collaborations can create value in both countries without implying the deindustrialization of either of them.

Value creation in Brazil doesn't need to be presented as a binary competition against the German industry. Cross-investments, joint ventures, manufacturing contracts, and distribution collaborations can move certain stages to the origin while preserving the participation of German companies in technology, brand, distribution, and consumer access. The economic goal is to increase the worth of the supply chain and improve its distribution.

7.6. Long-Term Contracts and Protection of Margins

Long-term contracts solely based on nominal prices may fail to protect income when fertilizers, energy, diesel, pesticides, and labor also fluctuate sharply. Pilot projects could test regional cost indices and review mechanisms that protect a minimum margin, without requiring unrestricted access to the farmers' accounting. This is a proposal for contractual innovation, not an established practice or a projected outcome.

The agenda needs to involve governments, buyers, importers, cooperatives, associations, farmers, research institutions, and funding entities. Current cooperation and assistance initiatives, including those involving German cooperation, developed by GIZ or other stakeholders, should be leveraged and expanded, not presented as entirely new proposals. Robust indicators — costs avoided, registrations reutilized, farmers included, productivity, and stable contracts — would allow an evaluation of the results.

Table 3 – Suggested Agenda for Brazil-Germany Cooperation on Coffee, with Priorities and Stakeholders Involved.

Pillar	Converging Interest	Examples of Action
EUDR Interoperability	Brazil: reduce duplication and protect data. Germany: obtain reliable and reusable evidence.	Expand pilot projects with associations and cooperative-importers; data standards; APIs; validation of evidence.
Inclusion of farmers	Brazil: keep small and medium-sized farmers in the supply chain. Germany: expand usable supplier base.	Technical assistance; collective georeferencing; funding through cooperatives.
Productivity and climate	Brazil: income and resilience. Germany: supply reliability.	Genetics, management, irrigation, soil, mechanization, applied research.
Value addition	Brazil: greater value capture. Germany: new supply and investment models.	B2B, private labels, joint ventures, processing at the origin, shared distribution.
Long-standing relations	Brazil: predictability of margins. Germany: continuity of supply.	Pilot contracts with cost review and shared risk management.

7.7. Recommendations for Implementation by Stakeholder

- Brazil and public institutions: prioritize interoperability of databases; develop evidence reutilization criteria; promote a Coffee Farming Complex, AB+S, and state/sectoral systems as complementary infrastructure; protect the LGPD data protection legislation, data confidentiality and sovereignty; support technical assistance and climate adaptation.

- Germany and EU stakeholders: avoid inconsistent private requirements when the same evidence can be reutilized; co-finance adaptation at the origin; support transparent evaluation of Brazilian systems; integrate supply reliability with investments in productivity, resilience, and income.

- Brazilian cooperatives, associations, and exporters: integrate registrations, production plots, delivery, inventory, and lot data; create information quality updating and control procedures; use collective scaling to reduce inclusion costs; establish clear governance over who validates and transmits each piece of data.

- Brazilian industry: treat tariff preferences as a trade opportunity, not just as a customs opportunity; for soluble coffee, expand B2B/private label prospecting and prepare industry-level traceability for 2027; for roasted coffee, prioritize niches where origin, quality, and transparency offset distribution costs.

- Bilateral cooperation: draft a multi-year agenda with verifiable goals, such as farmers incorporated into interoperable systems, duplication avoided, projects funded, production capacity preserved, investments catalyzed, and long-standing trade relations established.

The recognition and utilization of Brazilian systems should be treated as a technical agenda of trust, not as the pursuit of a generic statement of equivalence with the EUDR. Annex 18-A allows the documentation and data from certification, traceability, and monitoring systems officially recognized, registered, or identified by Mercosur countries to be used as a source within the limits of the EU legislation. The practical priority is to demonstrate methodological consistency, data quality, updating, and auditability, thus reducing the need to trace back the same pieces of evidence on parallel platforms.

For small and medium-sized farmers, cooperation projects can finance shared infrastructure. Georeferencing, technical assistance, registration updates, and integrated systems offer economies of scale when conducted by cooperatives and associations. Bilateral programs can prioritize organizations capable of reaching many farmers, establish inclusion indicators, and find whether compliance costs are distributed in a way that does not encourage excessive concentration of the supplier base.

Technological cooperation should be backed up by governance. Brazil has a legitimate interest in maintaining control over registries and geospatial and trade databases, while EU operators need to receive verifiable information within a timeframe and in a format that is consistent with their obligations. Solutions based on APIs, credentials, query logs, and selective evidence-sharing can accommodate these objectives. Dependence on specific providers or the full replication of databases abroad should be avoided when the same regulatory outcome can be achieved using interoperable interfaces.

The sustainability agenda must remain linked to production capacity. Regenerative agriculture, soil management, functional biodiversity, water efficiency, and reduction of emissions can contribute to resilience, but projects need to demonstrate their agronomic and economic suitability to the regional context. Practices that reduce productivity or substantially increase costs without economic compensation may jeopardize income and, consequently, farmers' investment capacity. Environmental and economic sustainability are not separable in dimensions of long-cycle perennial crops.

With regards to value addition, a bilateral agenda could explore models in which German companies participate in processing at the origin rather than viewing it solely as competitive substitution. Manufacturing contracts, direct investments, joint ventures, and joint product development can combine the closeness of raw materials with European technology, branding, and distribution. For instant coffee, this type of cooperation can foster expansion driven by economies of scale; for roasted coffee, it may be more suitable for single-origin product lines, specialty coffees, and value-added products.

Innovation can also extend to long-standing trade relations. Simply setting a future price may not protect income when the costs of fertilizers, labor, energy, and inputs vary strongly. Pilot projects can test revision mechanisms or margin corridors based on transparent cost references thereby maintaining farmers' share in positive market shifts. Rather than defining a one-size-fits-all contractual model, the focus is on bridging the buyers' reliability of supply with the economic sustainability of farmers.

8. Conclusions

The Brazil–Germany coffee trade is entering a phase in which tariffs, regulatory information, value addition, and supply must be addressed together. The market opening offered by the EU–Mercosur Agreement focuses on processed coffee; the main bilateral flow, i.e., non-decaffeinated green coffee, was already duty-free on the EU side. The EUDR operates in parallel by adding production, legality, and due diligence requirements.

The market for instant coffee presents more mature manufacturing conditions to convert tariff preferences into new business. Brazil's share of roasted coffee imported by Germany remains nonetheless minimal and faces distribution and logistics barriers. The Brazilian industry sees real opportunities regarding ingredients, industrial supply, private labels, and freeze-dried products, but its results cannot be solely estimated by tariff reductions.

Readiness for the EUDR is uneven. Brazil's database and the experience of organized export chains are valuable assets, but the main barrier still lies with interoperability and the inclusion of farmers that do not receive the right amount of technical and commercial support. Compliance costs, especially when duplicated, can be unevenly distributed and are not associated with a guaranteed premium.

The bilateral agenda should address varying and complementary interests: reliability of supply, production capacity and income at the origin, greater appreciation of Brazilian systems, and access to higher value-added industrial opportunities. The goal is not just to supply coffee attached to documents, but to build more resilient economic relations, with reliable information, investment at the origin, and a more balanced distribution of costs and benefits.

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