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Workers fertilizing an oil palm plantation in Papua, Indonesia.
Photo: Agus Andrianto/CIFOR

Women and equity in the EUDR

Beyond due diligence and risk mitigation

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To benefit women as forest users, forest farmers and smallholder producers, the EUDR must catalyze the business case and economic incentives for creating shared value.

Introduction

The European Union Deforestation Regulation (EUDR) is a trade and environmental policy enacted in June 2023 to reduce deforestation, forest degradation, biodiversity loss, and CO₂ emissions from the production of seven commodities with a high risk of contributing to deforestation: beef, soy, cocoa, coffee, natural rubber, palm oil and wood products. The regulation applies to products placed on the European Union (EU) market or exported from there. It requires companies across the target commodity chains to perform due diligence, trace products to their origin, and ensure that their products in the EU markets are deforestation-free.

The EUDR is a welcome departure from business as usual, holding companies and countries accountable for deforestation in their supply chains (Baffoe, 2023), although there is concern that the EUDR does not

do enough to safeguard against social risks, especially for women, in smallholder-dominated value chains and forest-dependent communities. The Team Europe Initiative on Deforestation-free Value Chains (GIZ, 2023; Team Europe Initiative, 2023) represents a growing consensus among actors working together with stakeholders in producing countries to join efforts and mitigate risks while leveraging the EUDR to realize social sustainability goals. The initiative provides financial and technical support to partner countries to help smallholders prepare for the operationalization of EUDR. The Sustainable Agriculture for Forest Ecosystems (SAFE) project under the Team Europe Initiative identifies opportunities and extends training to local actors to enhance women's inclusion and equity.

This article examines the risks to and opportunities for women, in all their diversity, as forest users, stewards and value chain actors as a result of the EUDR. While concerns often focus on displacing women's forest livelihoods or excluding them from markets, the EUDR could also legitimize and incentivize women's production practices at agriculture-forest frontiers, especially through shade-grown agroforestry. This article examines the EUDR's potential threats to women's tenure security and livelihoods, as well as its possibilities for their legal, technical and market inclusion.

European Union Deforestation Regulation (EUDR)

The EUDR regulates products entering the EU market. To demonstrate compliance with the EUDR, commodities or products placed on or exported from the EU market must fulfil three conditions from EU (EU, 2023), Article 3: a) they are deforestation-free; b) they have been produced in accordance with the relevant legislation of the country of production; and c) they are covered by a due diligence statement, including geolocations of sourcing areas. Operators and traders submitting products to the European market must demonstrate compliance with Articles 3a and 3b through a due diligence statement.

Deforestation in the context of the EUDR refers to the conversion of forested land to agricultural land that occurred from December 31, 2020 to the present. The regulation applies equally to deforestation caused by natural disturbances and by human activities, meaning that forests cleared by natural disasters (such as fire or extreme weather) cannot be converted to agriculture but must be allowed to regenerate naturally. Deforestation-free commodities are those that are not sourced from land that could be classified as forest at any time during the period covered by the regulation. The tracking and



A Kichwa girl carries fruit home, Napo Province, Ecuador. Photo: Tomas Munita/CIFOR



A Kichwa villager cuts down small trees using a machete, clearing an area to sow corn to feed livestock. Photo: Tomas Munita/CIFOR

traceability systems aim to uphold information transfer along supply chains.

The EUDR requires commodities to be produced in accordance with the relevant legislation of the country of production. This includes laws applicable to issues such as land use rights, human rights, Indigenous peoples' rights, environmental protection, labour rights, the principle of free, prior and informed consent (FPIC), and tax, anti-corruption, trade and customs instruments. National governments have a critical role to play in leveraging the EUDR to secure markets for forest-friendly commodities while concurrently supporting their commitments to climate-resilience and avoided deforestation.

The EUDR due diligence process requires operators and traders to complete risk management and mitigation assessments (Article 10, Sections 2c–e). Operators and traders are further responsible for demonstrating how their risk mitigation procedures and measures reduced risk to a negligible level.

Risk assessments are to be completed annually, with data stored for five years and available on request. The EU's The Deforestation Due Diligence Registry is an online tool to support monitoring and streamline the process. SMEs are not required to submit due diligence statements if their products are included in the due diligence statements of downstream actors. Penalties for non-compliance include confiscation of goods, fines on operators' revenues, or exclusion of up to 12 months, or more for repeat offenders, from EU markets.

EUDR-mediated risks to women

The EUDR does not address gender or gender-specific social safeguards. While Article 30 calls for the European Commission and member states to engage with producer countries to address the root causes of deforestation and forest degradation, including poverty, the EUDR itself primarily focuses on regulating trade and due diligence rather than directly addressing social and economic root causes. However, by promoting sustainable practices and enhanced supply chain transparency, the regulation

indirectly encourages improvements in production practices.

Due diligence and risk management can be used as entry points for identifying and mediating risks to women in their roles as forest users and smallholder producers, while acknowledging that mitigation is limited by reacting to harm rather than proactively addressing inequality at its roots. Without explicit gender- or equity-responsive approaches and indicators, the EUDR risks reinforcing gender norms that alienate women from their land and resource rights, or worse, exploit their informal and oftentimes invisible labour in deforestation-risk commodity chains. Where national legislation is weak or silent on gender, operators and traders may not be held accountable for mitigating gender-specific risks.

National policies on gender discrimination do not guarantee that the rights of marginalized women will be respected or enforced. Legacies of land grabbing under varied circumstances demonstrate the gap between national policy and harmful acts against Indigenous women and forest-dependent communities.

Women as forest users and forest stewards

Women in forest-dependent communities play an essential role in the conservation and stewardship of forest resources through their gendered livelihood activities, such as gathering firewood and fodder, collecting water, and cultivating and foraging for forest foods and non-timber forest products (NTFPs) (Sunderland et al., 2014). Though this work contributes significantly to forestry and forest value chains, much of it is informal, invisible and vulnerable to land-use change and other shocks (Elias et al., 2024). While women are often seen as protectors of traditional knowledge and forest resources, their ability to balance conservation and production is often limited due to their lack of tenure security and of access to information, technology and finance (Doss et al., 2018).

There are concerns that the EUDR may drive land commodification in favour of zero-deforestation crops, potentially displacing women's food production and forest-based activities, even where FPIC protections apply. Without gender-specific approaches, efforts to formalize and digitalize land use change risk enclosure and leakage, further threatening women's livelihoods.

Women as smallholder producers

Women participate in all stages of deforestation-risk value chains, mostly in informal small enterprises (Ingram et al., 2016). When smallholder women have decision-

making power, they often favour agroforestry and other multifunctional systems, intercropping food and cash crops (Gallagher et al., 2020). However, the EUDR may devalue agroforestry by classifying it as agriculture, pushing intensification, monoculture and leakage to non-EU markets.

Land rights remain a complex issue in women's access to and control over the benefits derived from commodity production. The EUDR's prioritization of relevant national laws and local contexts is positive but does not always translate into gender equity. Globally, FAO (2018) estimates that less than 15% of agricultural landholders are women, who are less likely to hold legal tenure, either jointly or individually. Women's landholdings also tend to be smaller, with lower yields due to low inputs.

The EUDR may indirectly exacerbate these inequalities, most significantly through formalization and digitalization requirements. Women smallholders already face challenges accessing export markets; they rely on intermediaries and aggregators and in return receive lower producer prices (Bernal et al., 2022). Traceability poses additional challenges and administrative burden. While the responsibility for due diligence lies with traders and operators, economies of scale favour large enterprises, easing traceability, aggregation and transport costs. Larger companies are better equipped to comply with the EUDR, potentially leading to market elitism (Bager et al., 2021), weakening smallholder bargaining power (Sahan and Fischer-Mackey, 2011), and relegating women producers to informal and non-EU markets or compelling them to transition to commodities that drive deforestation. Traceability support for smallholders exists through various organizations and standards, but has not consistently integrated gender.

Opportunities for inclusion

The SAFE project under the Team Europe Initiative has commissioned several studies to identify legal, technical and market opportunities for smallholders to leverage the EUDR to their benefit.

Legal opportunities

Integrating gender-sensitive indicators in risk assessments, such as human rights risks, is essential for due diligence. Frameworks such as the United Nations Guiding Principles can ensure that gender considerations are fully incorporated. Even without gender-specific criteria, women smallholders and IPLCs can still proactively engage in risk management.

The priority that the EUDR gives to national policies offers civil society more agency in local forums to advance safeguards around land-based investments, FPIC, community rights and gender justice, whereas international frameworks such as the Sustainable Development Goals, the Paris Agreement and the Rio Conventions can drive gender equity and inclusion through top-down policy. The NDC Partnership and FPIC provide foundational support, but their success depends on the strength of country-level implementation. Voluntary frameworks such as REDD+ have shown how gender-sensitive approaches and local consultation can achieve fairer outcomes (UNDP, 2017).

With access to EU markets, other regulations apply, such as the Corporate Sustainability Due Diligence Directive (CSDDD). This requires large companies to identify, prevent, mitigate and account for potential adverse impacts on human rights and the environment in their operations and business relationships. It applies to both EU and non-EU companies that operate in the EU market. The directive is gender-neutral; it cannot address all the gaps in the EUDR, but is a step in the right direction.

Technical opportunities

EUDR proponents are optimistic that smallholders will be able to leverage its data requirements to their benefit (EC, 2023). The Team Europe Initiative/SAFE have dedicated significant resources to sensitize smallholders about data inputs at the farm level, developing guides and training videos to demystify geolocation and farm boundary mapping, and show how these data are uploaded with Due Diligence Statements (DDSs). As noted above, the Due Diligence Registry exempts SMEs from direct reporting if downstream actors already cover their products. In line with the EU's Open Data Directive, anonymized geolocation data and supplier information will be made publicly available. The hope is that smallholders will not only own the data that is collected about them, but will mobilize it to gain a stronger and more independent position in the value chain, and in turn, receive fairer prices for their products. This could potentially lead to higher incomes and new business opportunities, especially if accompanied by targeted support measures (EC, 2023).

Warren-Thomas et al. (2023) argue that traceability helps smallholders, especially women, by making them more



A family sitting after collecting fuelwood, Central Kalimantan, Indonesia. Photo: Achmad Ibrahim/CIFOR

visible and their farms more accessible to sustainable intensification. Making the most of the public digital infrastructure, however, requires capacity building, sharing and strengthening across scales. Smallholders and SMEs must understand what data is needed, how markets use it, and how to leverage their traceable data to attract social enterprises and niche buyers.

Market opportunities

Access to the EU market allows smallholders to connect with social entrepreneurs, impact investors and consumers who demand social and environmental accountability. Voluntary standards for social safeguards in EU countries offer a market-driven pathway for integrating gender equity and inclusion, moving beyond “do no harm” to more proactive and transformative approaches (Lofts et al., 2021). Smallholders and SMEs can leverage their EUDR-enabled access to markets by partnering with certification bodies with social inclusion standards such as Fairtrade (Gallagher et al., 2020).

However, women producers need practical incentives, and economic operators require investment returns to support traceability. Formalizing business relationships — directly or through intermediaries — will be essential for women's access to markets. Social enterprises can bridge gaps in services, working capital, digital literacy and geolocation data to enhance participation and compliance. Incentives such as premiums for climate-resilient agroforestry or payments for ecosystem services could further support women producers and mitigate the risk of leakage.

The EUDR does not unlock these market opportunities; it will take concerted effort on the part of social enterprises, enabling institutions and initiatives, and women producers themselves.

Recommendations for EUDR readiness

The EUDR will be reviewed every five years with stakeholder engagement, providing multiple opportunities to assess progress and obtain input on how social safeguards, intersectional inclusion and benefit-sharing could better align with the EU's social and environmental sustainability goals. To benefit women as forest users, forest farmers and smallholder producers, the EUDR must catalyze the business case and economic incentives for creating shared value. An example activity for engaging these processes is developing a community of practice supporting shared learning to channel into policy and practice to address these issues and opportunities with

relevant stakeholders in partner countries; CIFOR is currently developing a training of trainers to initiate this and prepare landscape actors and smallholders for EUDR operationalization under the SAFE project.

This article identifies opportunities for gender equity and intersectional inclusion through legal, technical and market change pathways:

- Legal empowerment: Smallholders, especially women, need training on land rights, EUDR roles, and due diligence for risk management, while recognizing customary land tenure and Indigenous claims for deforestation-free production.
- Data empowerment: Smallholders must understand how data about them is collected and managed, and must know how they can use digital tools.
- Market empowerment: Smallholders require training in market opportunities for deforestation-free, socially responsible commodities, with strategies to reach buyers who are willing to invest in due diligence. Organizing can help them access sustainable markets and strengthen their position.

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References

- Bager, S. L., Persson, U. M. and dos Reis, T. N. P. (2021). Eighty-six EU policy options for reducing imported deforestation. *One Earth*, 4(2), 289–306. <https://doi.org/10.1016/j.oneear.2021.01.011>.
- Baffoe, A. (2023). EU Deforestation Regulation (EUDR) must not ignore needs of African farmers. *African Business*, 1-September-2023. <https://african.business/2023/09/resources/eu-deforestation-regulation-eudr-must-not-ignore-needs-of-african-farmers>
- Bernal, M., Vijayakumar, C., Lovera, S. and Wolff, I. (2022). *A gendered perspective of the proposed EU Regulation on deforestation-free products*. Global Forest Coalition. https://www.fern.org/fileadmin/uploads/fern/Documents/2022/EN_A_Gendered_Perspective_on_Deforestation_Regulation.pdf.
- Doss, C., Meinzen-Dick, R., Quisumbing, A. and Theis, S. (2018). Women in agriculture: Four myths. *Global Food Security*, 16, 69–74. <https://doi.org/10.1016/j.gfs.2017.10.001>.
- EC (European Commission: Directorate-General for Environment). (2023). *EU deforestation regulation – An opportunity for smallholders*. Publications Office of the European Union. <https://data.europa.eu/doi/10.2779/9252>
- Elias, M., Zaremba, H., Tavenner, K., Ragasa, C., Paez-Valencia, A.M., Choudhury, A. and de Haan, N. (2024). Towards gender equality in forestry, livestock, fisheries and aquaculture. *Global Food Security*, 41, 100761. <https://doi.org/10.1016/j.gfs.2024.100761>
- EU (European Union). (2023). Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010. *Official Journal of the European Union*. L 150/206.
- FAO (Food and Agriculture Organization). (2018). *The gender gap in land rights*. FAO. <https://openknowledge.fao.org/server/api/core/bitstreams/4966d50c-233b-43a9-8fa7-8d43263dd082/content>.
- Gallagher, E. J., Monterroso, I. and Sanjaya, M. (2020). *Women's access, equity and empowerment: Progress and uptake of the Fairtrade gender strategy 2016–2020*. ICRAF, Fairtrade International. <https://www.fairtrade.net/en/get-involved/library/women-s-access--equity-and-empowerment--progress-and-uptake-of-t.html>.
- GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit). (2023). *Sustainable Agriculture for Forest Ecosystems (SAFE)*. GIZ. <https://www.giz.de/en/downloads/giz2023-en-sustainable-agriculture-for-forest-ecosystems.pdf>.
- Ingram, V., Haverhals, M., Petersen, S., Elias, M., Basnett, B. and Sola, P. (2016). Gender and forest, tree and agroforestry value chains: Evidence from literature. In C.J. Pierce Colfer, B. Basnett, and M. Elias (Eds.). *Gender and forests: Climate change, tenure, value chains and emerging issues* (Chapter: 13). Routledge. <https://hdl.handle.net/10568/78628>
- Lofts, K., Sarmiento Barletti, J.P. and Larson, A.M. (2021). *Lessons towards rights-responsive REDD+ safeguards from a literature review*. Working Paper 280. Bogor, Indonesia: CIFOR. https://www.cifor-icraf.org/publications/pdf_files/WPapers/WP280Lofts.pdf
- Sahan, E. and Fischer-Mackey. (2011). *Making markets empower the poor: Programme perspectives on using markets to empower women and men living in poverty*. Oxfam Discussion Paper. <https://www.enterprise-development.org/wp-content/uploads/M4POxfam-Making-markets-empower-the-poor.pdf>.
- Sunderland, T., Achdiawan, R., Angelsen, A., Babigumira, R., Ickowitz, A., Paumgarten, F., Reyes-García, V. and Shively, G. (2014). Challenging perceptions about men, women, and forest product use: A global comparative study. *World Development*, 64 (Supp. 1), 556–566. <https://doi.org/10.1016/j.worlddev.2014.03.003>
- Team Europe Initiative. (2023). *Team Europe Initiative on deforestation-free value chains*. Zero Deforestation Hub. <https://zerodeforestationhub.eu/>.
- UNDP (United Nations Development Programme). (2017). *Gender and REDD+*. UNDP. <https://www.undp.org/sites/g/files/zskgke326/files/publications/UNDP%20Gender%20and%20REDD+Policy%20Brief%206-WEB.pdf>.
- Warren-Thomas, E., Ahrends, A., Wang, Y., Wang, M. H. and Jones, J.P.G. (2023). Rubber's inclusion in zero-deforestation legislation is necessary but not sufficient to reduce impacts on biodiversity. *Conservation Letters*, 16(5), e12967. <https://doi.org/10.1111/conl.12967>

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