



**IDEF**  
Initiatives pour le Développement communautaire et la conservation de la Forêt  
Cocody-les-Deux-Plateaux, quartier Djibi, Ilot N°3471, Lot N°280, 2ème étage de l'immeuble en face du  
Stade d'Angré, BP 518 Abidjan 27,  
Zagné (Région du Cavally) et Soubré (Région de la Nawa).

BP : 518 Abidjan 27, E-Mail: [contact@ongidef.org](mailto:contact@ongidef.org)

Tel : (+225) 27 22 50 10 61,  
(+225) 07 49 10 21 93,  
(+225) 01 40 73 81 75

IDEF, *au service des communautés et de la Forêt*

# Independent Cocoa Monitoring (ICM): an innovative approach in Ivory Coast

## Context

At a time when Ivory Coast is embarking on a political dialogue on sustainable cocoa, it seems appropriate for all stakeholders to participate in this dialogue and improve the governance of the long-criticized sector. Cocoa has played an undeniable strategic role in the economic and social development of Ivory Coast. According to the Coffee and Cocoa Council, Ivory Coast produced two million tons of cocoa, i.e. around 45% of world production in 2020. The sector thus represents around 14% of the Gross Domestic Product (GDP) and nearly 6 million people derive their resources from cocoa farming. It provides a large portion of export earnings (40%). The European Union is the main market of Côte d'Ivoire since 67% of Ivorian cocoa exports are destined there.

## Introduction

Launched in the early 2000s by international non-governmental organizations (NGOs), notably [Global Witness](#) and [REM](#), the Independent Monitoring (IM) approach has been tested and refined in several countries. IM is an approach that aims to assess compliance with regulations in a given sector, to identify the malfunctions observed and to propose recommendations to correct them. This approach, much used in the field of elections to ensure the credibility of votes, has been extended for several years to other fields such as the mining sector, hydrocarbons, land, fishing, development infrastructure (dams, roads, highways), in the forestry sector, and now in the cocoa sector in Ivory Coast. Within this framework and in collaboration with REM, [IDEF](#) has led a pilot project since 2020 funded by [The Waterloo Foundation](#) (TWF) to explore the feasibility of Independent Cocoa Monitoring (ICM) in Ivory Coast based on IM for forests. The objective of the pilot project was to help strengthen transparency and reduce the pressure of the cocoa industry on Ivorian forests through the implementation of an ICM project. This innovative approach in the cocoa sector is structured around four specific objectives:

1. Collect and disseminate reliable and verifiable data to improve cocoa sector governance
2. Engage and set up a network of stakeholders committed to transparency and improved governance in the cocoa sector
3. Strengthen the understanding of actors on the governance of the cocoa sector
4. Document specific problems/challenges and potential solutions related to cocoa traceability for better application of the future European Union regulation on imported deforestation (EUDR, see Box 1)

## Problems

Given its contribution to the Ivorian economy (GDP), the cocoa sector in Ivory Coast is highly strategic for the government. Gaps in the cocoa sector are many and complex. Stakes are high and private sector actors (chocolate companies) are very powerful. On the side of the administration, the regulator of the sector, the Coffee and Cocoa Council (CCC) is the main actor. The functioning of the sector is characterized by opacity. CCC, the regulatory body for the sector, operates without an approach involving all stakeholders in decision-making. This makes collaborating with various stakeholders difficult, and does not constitute a good environment for the work of an Independent Monitor, who faces high risks of being refused collaboration.

On the private sector side, several multinationals have national representatives who have no decision-making power since those who have them are based outside of Ivory Coast. These companies are bound by secrecy and lack of desire to share information due to confidentiality or trademark protection clauses.

In addition, ICM implementation requires significant financial resources. For now, the lack of available funding remains one of the main obstacles to the deployment of ICM in Ivory Coast. Beside this, specific legal and technical skills are necessary for the analysis of legal texts and to carry out investigations, especially to research and analyze information which is not systematically made public.

## Independent Cocoa Monitoring: an innovative approach for sustainable cocoa production in Ivory Coast

Independent Monitoring is an approach that can be applied "to almost any field". However, to undertake IM, it is advisable to develop appropriate procedures, methodologies to be able to generate reliable and credible information that can be used by the actors involved. This is what can truly lead to improvement in transparency in the cocoa sector and the dissemination of information. It can also considerably strengthen the enforcement of laws on the ground by fighting both against all forms of illegality, the corruption which often prevails.

Independent Monitoring also improves practices and transparency for the sustainable management of cocoa production. The information it produces can help the administration in charge of the

agricultural sector to enforce laws and procedures with more rigour, to fight against illegal exploitation and bring supply chain actors to better comply with existing laws.

ICM is a tool that can provide credibility through independent investigations of the entire supply chain, including certification and sustainability programs, trade, cooperative certification reports, traceability of supply, etc. General comments on ICM by actors of the sector show that it can be an important tool to reinforce transparency in the sector. Collecting, processing and disseminating data to improve the management and the functioning of the cocoa sector improves transparency by producing data which can be used by those who have any interest in the good management of the sector.

## **ICM and the new European regulation on imported deforestation (EUDR)**

### **Box 1 : Focus on the new EU regulation against imported deforestation (EUDR)**

On December 6, 2022, the governing bodies of the European Union reached an agreement on the European regulation relating to products linked to deforestation. This text will come into force in 18 months for large companies and later for small and medium-sized companies.

This regulation highlights two main requirements: for a product to access the European markets, it must be (1) zero deforestation, i.e. a product that has not been cultivated by clearing a forest and (2) respect the laws of the producing country.

For the deforestation requirement, the regulation establishes the concept of a reference year. This means that to verify the zero deforestation requirement, the regulation has set December 31, 2020 as the reference date. If a product is grown thanks to the destruction of a forest after this date, this product is considered to be from deforestation. It won't be legal to buy it in the European market. This new European legislation therefore requires traceability work.

The regulation also includes risk assessment by country. For verifications, the EU intends to classify producing countries into three groups: (1) high-risk countries; (2) standard risk countries; and (3) low risk countries.

On the basis of satellite tools, the level of deforestation will therefore be assessed by the competent European authorities in order to make this classification by country. By default, when the regulation comes into force, all countries will be classified in the standard risk category.

An evaluation is planned after two years of implementation of the regulation in order to draw lessons and implement the necessary improvements.

The new EU regulation is a good opportunity to strengthen control and the regulatory framework in producing countries. For IDEF, collaboration is necessary in order to strengthen the action of the competent authorities on the data collected. It will therefore be up to the two entities to establish a framework for a credible exchange of reliable and transparent data that each entity will need in the context of its action. For a better collaboration with competent authorities, we propose in the first place to:

- Set up an alert system at the level of the EU or the CSOs of the producing countries in order to respond quickly to requests and the search for additional information;
- Strengthen gathering of information on what works or not at the field level;
- Set up an anonymous complaint mechanism for the denunciation of cases of abuse by actors in the sector.

For strategic reasons, advocacy actions aimed at decision-makers should be considered in order to make concrete proposals to respond to the challenges of the sector. The framework of collaboration with the actors of the cocoa sector should be strengthened through exchange sessions on ICM. In particular, through EU support for cocoa policy dialogue by organizing discussions on the principle of transparency (Annexe X<sup>1</sup> on information to be made public), as was the case with the FLEGT VPA in the forest sector.

To improve ICM implementation in Ivory Coast, technical and financial support from the EU to civil society actors is necessary to build their technical capacity, develop further their strategy and methodology and share the ICM approach/methodology with actors of the supply chain. In this context, IDEF recommends collaboration on the application of Article 15 of the EU regulation on imported deforestation: Operator controls. ICM can help the competent authorities to collect and verify data in order to give them credibility.

## Conclusion

Thanks to the ICM pilot project, IDEF has been able to forge strong links with key actors of the cocoa sector in Ivory Coast. This project also marks a turning point in the improvement of the governance of the sector and an opening on a new work methodology, different from that applied in the forest sector. To strengthen this initiative, IDEF would like an extension of the actions started in order to strengthen not only its IM actions applicable to the cocoa sector but to affirm its leadership in the sector as the first Independent Monitor of the cocoa sector. The deliverables can constitute working bases for the extension and implementation of ICM projects in Ivory Coast.

Above all, the project has enabled the establishment of a Technical Working Group on the themes of the cocoa sector, whose actions play a major role in sustainable cocoa. Thanks to the technical support of this working group, IDEF was able to significantly influence the decisions taken in the first exchanges on sustainable cocoa that were unfavourable to small producers. This was often achieved by publishing position papers and advocacy notes (see below). The ICM as an entity makes itself available to strengthen the framework of collaboration with the EU in the context of the new regulation to ban the import of products linked to deforestation.

---

<sup>1</sup> This annex provides a formal framework that requires the administration to make documents and information public either systematically or at the request of an actor, in particular civil society.

# ICM publications

## Investigation reports

- [Independent Monitoring report on the major challenges of the cocoa sector in Ivory Coast](#)
- [Independent Monitoring report on the risk of illegal cocoa supply in the Guémon region](#)

## Blog articles

- [Independent Monitoring documents the major challenges of the cocoa sector in Ivory Coast](#)
- [Risk of illegal cocoa supply in the Mont Péko National Park \(Ivory Coast\)](#)

## Analysis and position papers

- [Analysis note on the reference year in the proposed European regulation](#)
- [Position paper from Ivorian civil society for European decision-makers on the European Union regulation](#)
- [Letter to European decision-makers in favour of the geolocation requirement in the context of traceability](#)