

**Public Minutes of a Meeting of the
ICE CoT Advisory & Oversight Committee (“Committee”) of
ICE Benchmark Administration (“IBA”)
Training Room 2, Sancroft, Rose Street, Paternoster Square, London EC4M 7DQ
Wednesday, 30 April 2025 - 14:00 UK**

PRESENT: Mr H Poelma (Independent), Chairman
Mr B Clarkson (LDC) - *by Zoom*
Ms K Hancock (ICE Futures Europe)
Mr G Manley (IBA INED)
Mr M Moesbergen (Cargill)
Mr C de Ruig (IBA President)
Mr C Thompson (Volcafe) - *by Zoom*
Mr W Zimmerman (Barry Callebaut)

APOLOGIES: Mr A Cristiano (Ferrero / CAOBISSCO)
Ms K Halle (ECOM)
Mr J Larrose (Touton)
Mr M Vashista (OLAM)

CIRCULATION: IBA website

	<p>Chairman’s Welcome and Apologies The Chairman welcomed the Members to the ICE CoT Advisory & Oversight Committee (ICE CoT AOC) meeting and noted the apologies as listed.</p> <p>The Chairman advised that Mr Aldo Cristiano (Ferrero / CAOBISSCO) had been appointed member of the Committee.</p>
	<p>Declaration of Conflicts of Interest None of the Committee Members had any new conflicts to declare.</p>
	<p>Competition Statement IBA read out a competition notice and disclaimer.</p>
	<p>Previous Meeting Full Minutes The full minutes of the ICE CoT Advisory & Oversight Committee meeting held on 11 March 2025 were considered and approved.</p> <p>Public Minutes The public minutes of the ICE CoT Advisory & Oversight Committee meeting held on 11 March 2025 were considered and approved for publication.</p> <p>Matters Arising The Chairman noted that matters arising items were closed, ongoing or would be covered during this or a future meeting.</p>
	<p>Regulatory Engagement & Update, incl. latest EC FAQs The Committee received a regulatory update noting that in mid-April, the European Commission (EC) had published new FAQs and guidance documents to simplify the implementation of EUDR thereby</p>

	<p>trying to avoid it being included in a “Simplification Omnibus”. The Committee noted that the EC was likely to issue further FAQs and guidance documents.</p> <p>The Committee noted that the EC had confirmed that it was looking to finalise the country benchmarking system for adoption before 30 June 2025.</p>
	<p>Industry Association Engagement & Update IBA updated the Committee about recent meetings during which IBA had the opportunity to present the ICE CoT service.</p> <p>The Committee noted that IBA had presented a lawful production and compliance risk solution webinar and was due to release a traceability solution video. It was further noted that IBA would be sponsoring and presenting at the Council of Coffee Exporters of Brazil’s (Cecafe’s) coffee conference in Brazil in July.</p>
	<p>ICE CoT Protocol on Downstream Information Sharing & Associated Controls IBA highlighted that the Committee had previously agreed the ICE CoT Downstream Information Sharing Protocol where, as a minimum, every buyer would know the immediate seller and that pre-EU import, a buyer and ‘owner’ of an ICE CoT badge would have the information required to submit a DDS, including the farm polygons or geolocations. It was noted that beyond the DDS issuance stage, no farm plot or other data would be required to be shared further along the chain.</p> <p>The Committee noted that IBA’s initial interpretation of the recently issued FAQs did not suggest the need for changing this approach.</p> <p>The Committee discussed the ascertaining due diligence obligation under the EUDR and agreed that the ICE CoT badge could support a commercially workable solution for sellers and buyers regarding the ability and requirements to demonstrate and ascertain compliance with EUDR due diligence requirements.</p> <p>The Committee considered and reaffirmed its decision about the ICE CoT Downstream Information Sharing Protocol.</p>
	<p>ICE CoT Grievance Procedure & Complaints Policy The Committee received the Grievance Procedure and the Complaints Policy, noting that the documents would be published on the ICE CoT website once IBA’s governance and approval processes were complete.</p> <p>The Committee considered and agreed the Grievance Procedure and the Complaints Policy.</p>
	<p>Field Audit/Inspection Update The Committee noted that IBA had appointed an external field auditor and was in contract negotiations.</p> <p>The Committee discussed the draft Field Audit/Inspection methodology, noting that the methodology would be finetuned with the assistance of the Technical Working Group (TWG) before the methodology would be presented to the Committee for agreement.</p> <p>The Committee noted that the Field Audit/Inspection methodology would be publicly available at launch of the ICE CoT service.</p> <p>The Committee discussed the consequences of non-compliance at EUDR level, including fines and the potential withdrawal of products, noting that IBA would engage with data uploaders regarding audits and would ensure relevant NCAs were informed if non-compliance was found.</p>
	<p>Updated Questionnaires & Traceability IBA presented and discussed the traceability questionnaires as:</p> <ol style="list-style-type: none"> 1. Aggregator Systems Questionnaire; 2. Lawful Production Questionnaire;

	<p>3. Physical Flow Traceability Questionnaire;</p> <p>4. Lawful Production (Tax, Anti-Corruption, Trade and Customs only) Questionnaire; and</p> <p>5. Transport and Shipping Questionnaire.</p>
	<p>ICE CoT Platform Pilot Update</p> <p>IBA provided the Committee with an update about the full end-to-end pilot, noting that 15 traders/operators, three brands and three NCAs were intending to take part in the trial.</p> <p>The Committee noted that traceability testing had so far been the most challenging test as it required trialists to identify and collect physical flow data that had previously formed part of their sustainability programmes and that under the EUDR had to become part of their compliance programmes.</p>
	<p>Technical Working Group (TWG) Update and Role, Procedure & Terms of Reference</p> <p>The Committee received the TWG Role Procedure & Terms of Reference, noting IBA's proposed changes.</p> <p>The Committee considered and agreed the periodic review of the TWG's Role Procedure and Terms of Reference complete.</p>
	<p>Annual Committee Effectiveness Review</p> <p>The Chairman thanked the members for providing feedback about the Committee's performance and effectiveness. He noted that the Committee's consensus was that it functioned well, members were very knowledgeable and issues were debated productively.</p>
	<p>Any Other Business</p> <p>The Chairman noted that the next meeting was scheduled for 25 June 2025.</p> <p>The Chairman thanked the Committee Members for their attendance and contributions and, with there being no further business to discuss, closed the meeting.</p>

Harold Poelma
Chairman