

ARBEITSGRUPPE

On the Finish Line Towards EUDR: Challenges & Opportunities for Effective Implementation

Networking event in the context of the FONEI working group on deforestation- and conversion-free soy supply chains

Wednesday, 15 October 2025 | 09:00-17:30 CET Impact Hub | Rollbergstraße 28A | 12053 Berlin

On behalf



Federal Ministry for Economic Cooperation and Development











09:00 09:30 09:50	Welcome & Introduction Dr. Annette Cerulli-Harms ConPolicy; Lisa Kirfel-Rühle BMZ EUDR: Current Developments and Outlook Dr. Felix von Glisczynski BMLEH	13:35	Data Management in Practice - Lightening Talks & Discussion: Standardization within the EUDR Context Peter Uhlig GS1 Practices and Tools within the Brazilian Context André Freitas WWF Brazil Insights from Practice: EUDR Implementation in Soy Trading Fernanda Teixeira Saturni Louis Dreyfus Company
10:15	Perspectives of the Competent Authority in Germany Sophie Mende-Sauer <i>BLE</i>	14:35	COFFEE BREAK
10:50	BREAK	15:00	Panel Discussion: Unlocking Positive Impact in Practical Implementation – Challenges and Approaches
11:15	WWF/Nextra Interview Study – Overview of the Results: Implementing the EUDR in Brazilian-German Supply Chains. Janika Ofterdinger Nextra Consulting		Dr. Daniel E Silva <i>WWF Brazil</i> ; Dr. Jaime Siqueira <i>Cerrado Network</i> ; Dr. Luciano Furtado Loubet <i>Abrampa</i> ; Wei Peng <i>Louis Dreyfus Company</i> Supporting EUDR Implementation:
44.85	Legality in the context of the EUDR:	16:00 16:20	Update of the Soy Certification Benchmark: Overview of the Results Pavel Boev Profundo EUDR and Beyond: Insights from the Helpdesk's Consulting Practice Dr. Katrin Merhof Helpdesk on Business and Human Rights
11:25	Brazilian Legislation relevant for EUDR and Implications for Due Diligence Systems. Dr. Luciano Furtado Loubet <i>Abrampa</i>	16:30	Summary and Key Takeaways
11:45	The importance of Indigenous Peoples and Traditional Communities in strengthening socio-biodiversity through their ways of life. Dr. Jaime Siqueira <i>Cerrado Network</i> ; Ricardo Terena <i>APIB</i>	16:40	Ulrike Hardner WWF Germany; Janika Ofterdinger Nextra Consulting Closing Remarks Dr. Annette Cerulli-Harms ConPolicy
12:25	LUNCH BUFFET	16:45	NETWORKING End of Event: 17:30

Welcome & Introduction

Dr. Annette Cerulli-Harms | *ConPolicy* Lisa Kirfel-Rühle | *BMZ*



EUDR: Current Developments and Outlook (with Q&A)

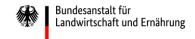
Dr. Felix von Glisczynski | *BMLEH*



Perspectives of the Competent Authority in Germany: Preparations and Learnings (with Q&A)

Sophie Mende-Sauer | BLE





Perspectives of the Competent Authority in Germany: Preparations and Learnings of the BLE

WWF - On the finish line towards EUDR: Challenges and opportunities for effective implementation – 15.10.2025



Agenda

- A. Recent developments at EU and national level
- B. Contents of the EU Regulation on deforestation-free products (EUDR) focus on existing simplifications
- C. Digital control process focus on the service portal to perform checks
- D. Current dry runs in third countries a mutual learning process
- E. Legality Requirements: The role of third party certifications and proof of legality
- F. Contact for further information



Letter of the EU Commissioner for the Environment to the Chair of the Environment Committee in the European Parliament (23 September 2025)

- "IT-system is very likely to slow down to unacceptable levels or even to repeated and long-lasting disruptions, which would negatively impact companies and their possibilities to comply with the EUDR, i.e. to be unable to register as EO, introduce DDS
- Despite efforts to adress the issue in time for the entry of application of the EUDR, it is not possible to have sufficient guarantees that the IT system will be able to sustain the level of the expected load
- In the view of this, the Commission is considering a postponement of the entry into application of EUDR (..) for one year, in order to avoid uncertainty for authorities and operational difficulties for stakeholders in the EU and third countries, and to allow time to remedy the identified risks."

Consequence: Approval by Parliament and Council required, TRILOG only if no agreement can be reached.



Press release from Germany's Federal Minister for Food, Agriculture and Regional Identity

- Federal Minister Alois Rainer advocates the introduction of a 'zero-risk option' in the EUDR in accordance with the coalition agreement.
- This should enable simplified information requirements for products from countries with negligible deforestation risk, as well as simplifications for agriculture, forestry and the value chain within the EU.
- The Federal Ministry of Agriculture, Food and Regional Identity (BMLEH) has already developed a proposal for the specific design of such an option, which is currently being coordinated with the other Federal Ministries involved.
- Involved are BMUKN (Federal Ministry for the Environment, Climate and Nuclear Safety), BMZ (Federal Ministry for Economic Cooperation and Development), BMWE (Federal Ministry for Economic Affairs and Energy) and the Federal Chancellery.



B. Contents of the EU Regulation on deforestation-free

products (EUDR) – focus on existing simplifications

Focus on already existing simplifications along the supply chain (see also FAQ 3.4. version 1.4.)

- According to recitals 51 and 53, the submission of DDS in the information system serves to ensure that all
 operators and traders take responsibility and keep track of their supply chain.
- The disclosure of information, including reference numbers, is a prerequisite for operators and traders to be able to fulfil this responsibility. There are exceptions to this principle in certain cases:
- SME traders and downstream SME operators are not required to collect information related to the fulfilment of due diligence obligations or to pass this information on to their customers.
- Downstream non-SME operators and non-SME traders who only need to verify that due diligence has been fulfilled upstream are not required to collect the information required under Article 9 of the EUDR.
- The EUDR only requires that all reference numbers that may be contained in a product must be listed. This means that mixing with other EUDR-compliant goods is permitted.

C. Digital control process – focus on the service portal to perform checks



Planned procedure for IT-supported EUDR checks (EUDR IT system of the BLE)



1. Companies register in the EU information system and specify their due diligence policy/submit DDS. They receive a reference number.



2. The BLE retrieves data from the EU information system and makes it available internally in the BLE's EUDR IT system for processing.



3. Analysis and evaluation of data, including for the purpose of deriving an annual control plan. Selection of the company to be checked.



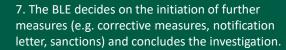
4. An examination order with login data for the service portal will be sent to the selected company, based on the selected sample/DDS.



5. Selected companies register in the service portal and enter company-specific information, answer questions on DD and selected sample(s) and submit them.



8. The EUDR IT system receives notification that the check has been completed. The company is informed of the result by letters from authorities/administrative act.





6. The BLE receives the answers to the questionary digitally and evaluates them; if necessary, in-depth on-site inspections (and, if necessary, i.e. an analysis of material samples) are carried out.

EUDR digital control process – focus on particular steps

Carrying out of checks (increasing the degree of automation in stages)

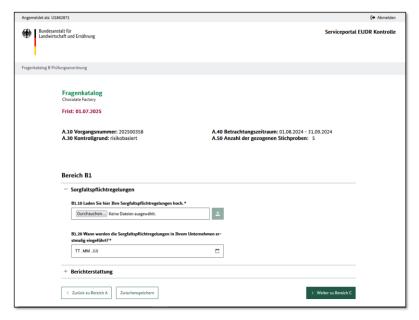
<u>Service portal</u> – Screens > (= "Questionary" to submit the relevant information on demand)

Examination order including login data:





Submitting information about operator/trader and DDS



EUDR digital control process – focus on particular steps

Carrying out of checks (increasing the degree of automation in stages)

Service portal – Screens

Information about selected sample by the control plan



> Submission to BLE



16

Geolocation checks within the EUDR digital control process

From the start of EUDR-controlling:

- Creation of the annual control plan: Geolocation based risk rules
 - Risk criteria (EUDR Art. 16) e.g. "distance to forest edge", "distance to indigenous area"
- Digital control process: Analysis of Traces Polygons of DDS

Research project for future controlling of geo data (timeframe: August 2024 until July 2027):

- "Risk-Based Monitoring Service (RiMoDi)" in collaboration with the Thünen-Institute
- Objective: Development of a risk-based Geographic Information System (GIS) analysis tool. Based on satellite data, spatial information on land cover and land use, as well as their temporal changes (e.g., detection of deforestation or forest degradation), is calculated. In the BLE review process, the results are evaluated using a GIS analysis tool, along with the geolocation information of the companies.

<u>Technical Framework for Analysis at BLE:</u>

DDS

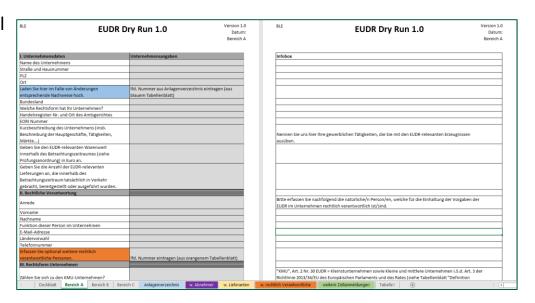
- 1. EO-Datasets (GFC, GFW, GLAD, RAAD, etc.)
- 2. Cloudbased Satellite Imagery (Sentinel, Landsat, Planet, etc.)
- 3. VHR-Imagery (WW, Pléiadis, Spot, etc.)

process

D. Current dry runs in third countries – a mutual learning

Dry runs in third countries

- Participating third countries include Kenya, Tanzania, Guatemala, Malaysia, Argentine, Chile
- Raw materials: soy, wood, coffee, palm oil
- Review of the content of the information and documents and general feedback



Preliminary results of EUDR dry runs run by the BLE (I)

- So far, two test runs have been completed in the areas of soy and wood (pulp); test runs for coffee, palm oil and beef are still being evaluated results are expected within a few weeks.
- In some cases, certificates were used without contextualizing what the certificate was used for and how it was integrated into the due diligence-system; this also applies to the risk mitigation measures taken (sole and blanket reference to certificates).
- In other cases, the connection between the proof to be provided and the certificate used for this purpose was completely missing or at least could not be established.
- Complete traceability of the products was not always possible; additional documentation, such as delivery receipts, would have been required.
- Some of the geodata submitted were incomplete or inconsistent with the delivery documents also submitted.
- The plausibility check of the area yields revealed in one case that the yield per area was unrealistically high.

Preliminary results of EUDR dry runs run by the BLE (II)

- The consideration of individual risk assessment criteria in the overall picture appeared to have been either not taken into account or not taken into account sufficiently.
- In some cases, missing sources meant that the reliability of a statement or evidence could not be verified.
- Risk assessment to access mixing risks was often inadequate.
- Nevertheless, many companies go to great lengths to comply with EUDR; the BLE provides general guidance and suggestions for improvement.

E. Legality Requirements: The role of third party certifications

and proof of legality

Legality Requirements

Third party certification and proof of legality (land use & tenure rights)

Potentials and limitations of certifications

- Certifications can help operators to fulfil their risk assessments
 - However: Operators are still required to exercise due diligence and are liable if they fail to meet EUDR due diligence requirements → Certifications and third-party verified schemes are no "green lane"!
- More detailed informations in EU-COM FAQ / guidance document from April 2025
- Several certification systems are currently being further improved

Proof of legality

Examples of proof of legality can be found in the EU Commission's guidelines on the EUTR:

To verify the **land use** and **tenure rights** of third parties (affected by logging):

- Environmental impact assessments
- Environmental management plans
- Eco-audit reports
- Corporate social responsibility agreements
- Special reports on claims and conflicts related to tenure and rights

Legality Requirements

Proof of legality (trade & customs regulations, other documentation)

<u>Trade and customs regulations</u>

- To demonstrate compliance with trade and customs regulations, generally available documents in paper or electronic form can be used, e.g.:
 - Contracts

- Bank statements

- Trade certificates

- Import licenses, export licenses

- Official receipts for export duties Export prohibition lists
- Certificates of export quota allocation

Further legal documentation

- Due to the BLE's experiences with controls under *EUTR*, the following documents can be seen as legit sources of proof:
 - Purchase contracts, supply contracts, invoices
- Business certificates (business license, trade permit, commercial or trade register extract)

- Lease agreements
- Cooperation agreements
- Processing permits
- Phytosanitary certificates (= plant health certificate or similar certificates, if applicable)

- Transport documents
- Tax assessments
- Customs certificates (import, export)

Legality Requirements

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F. Contact for further information





The BLE and the corresponding Federal Information Centre Agriculture (BZL) provide information on the implementation of the EUDR

1.	Website: www.ble.de/entwaldungsfrei	 Who has to take action? Overview of EUDR requirements for operators and traders: Visual aids for implementation Information on the EU Information System: With links to newly published videos by the EU Commission, German-language video to be published at a later date
2.	EUDR-newsletter	 Content: News from the EU Commission and the BMLEH, information to improve comprehension of the Regulation, notification of new content on the BLE website Frequency: irregular, first issue at the beginning of October 2024, a total of 8 issues in 2024 / between 2 and 3 editions per month Subscription at www.ble.de/entwaldungsfrei-newsletter
3.	EUDR webinars 2025	 Series of web seminars on EUDR with different thematic focuses (e.g. SMEs, customs issues, etc.) 8 dates planned, started in February - registration at www.ble.de/entwaldungsfrei-web-seminare
4.	Information for German primary production (soy, timber, cattle)	New article for domestic producers preparing for the EUDR: <u>www.praxis-agrar.de/eudr</u> (a website offered by the BZL)
5.	BLE-Helpdesk	The helpdesk answers questions about the EUDR at anfragen@entwaldungsfreie-produkte.de

Thank you for your attention!

Further information: www.ble.de/entwaldungsfrei

Contact

Bundesanstalt für Landwirtschaft und Ernährung/Federal Office for Agriculture and Food Deichmanns Aue 29 53179 Bonn

Group 41 – Deforestation-free products

Entwaldungsfreie-produkte@ble.de Website: www.ble.de/entwaldungsfrei

Helpdesk: anfragen@entwaldungsfreie-produkte.de

The information given in this presentation reflects the current (technical) state of affairs and does not justify any legal claims in individual cases, particularly in the context of performed audits in the future.



Do you have any questions or comments?



Updates on the EUDR from a Legal Perspective (with Q&A)

Max Jürgens | Cattwyk





Updates on the EUDR from a Legal Perspective

Networking event in the context of the FONEI working group on deforestationand conversion-free supply chains

Max Jürgens I 15 October 2025 I Impact Hub Berlin

Disclaimer

- Please note that the European Commission has formally published proposals to amend the EU Deforestation Regulation (EUDR) on 21. October 2025.
 - The following slides were drafted on 13 October 2025 and may therefore no longer be up to date.



Latest updates from Brussels

Postponement, "no-risk" classification, revised Annex I



Possible postponement of the EUDR





"No-risk" classification

"No-risk" classification under the benchmarkingsystem

- Proposal mainly driven by Germany Content: a "no-risk" benchmarking classification with de facto no due diligence obligations
- Scope: All or most EU Member States?

Legal Analysis

- Unjustified violation of the Most-Favoured-Nation principle under WTO law
- · Would not significantly simplify compliance, as it would mainly benefit domestic timber producers
- Requires substantial coordination between Parliament, Council, and the European Commission.





New Draft - Annex I

The Commission has proposed a delegated regulation to update Annex I with new exemptions:

- General exemption for all samples, but only
 - if they are of negligible value and quantity
 - if they can only be consumed or used to solicit orders for goods of their type
 - if the type of presentation and quantity preclude consumption or use for any purpose other than soliciting orders

ANNEX

Annex I is amended as follow:

- (1) In the column, 'Relevant products', table note (1) is added after the entry 'Relevant Product':
 - 'This Regulation does not apply to: a) Samples of products, which are of negligible value and quantity and can be consumed or used only to solicit orders for goods of the type they represent under the condition that the manner of presentation and quantity, for products of the same type or quality, rule out its consumption or use for any purpose other than that of seeking orders; b) Products which are to undergo examination, analysis or tests to determine their composition, quality or other technical characteristics for purposes of information or industrial or commercial research under the condition that the products to be analysed, examined or tested are completely used up or destroyed in the course of the examination, analysis or testing.'



Ongoing Legal Uncertainty

Scope of legality, value of certification, audit process



Legal challenges in practice

Contractual obligations passed down the supply chain



- Downstream (non-SME) trader/operator will require SME operator to only provide EUDR compliant products.
- How can SME operator guarante EUDR compliance? (no due diligence obligations for SME operator/trader, if not importer)
 - Trickle-down effect of contractual clauses
 - High liability risks!
 - Or: Declince responsibility for EUDR compliant products



Legal challenges in practice

Mixing EUDR products

- Szenario: SME operator buys cocoa from multiple suppliers inside the EU. All shipments have a DDS. Within the factory of the SMÉ operator, all shipments are mixed and then used for the production of chocolate
- Non-SME customer will require all relevante reference numbers.
- SME operator must make sure to track DDS reference numbers for the cocoa when producing chocolate. SME operator will then provide relevant DDS reference numbers to non-SME customer, so that the customer can submit ist own DDS based on all the DDS received from the SME operator.





BLE: New EUDR Audit IT System



Submit DDS via EU TRACES





Company logs in and submits audit questionnaire





BLE pulls data from TRACES





BLE reviews, conducts additional checks or sample analysis





BLE analyzes data under audit plan and selects companies for audits





BLE decides on follow-up measures (corrective action, offense case, etc.) and/or closes the audit





BLE sends audit order via post with log-in details





System records completion, company receives results



Content and Limits of DDS

→ Annex II of EUDR

- The DDS is submitted to the authority
- Necessary for the submission: prior fulfilment of the due diligence obligations!
- Current status: Consolidation possible (in terms of time and different products)
- Technical Limits:
 - 25 mb per DDS (more than 1 Million plots of land; see FAQ No 7.16)
 - 2000 DDS as possible points of reference

Legal Framework:

- DDS must not be older than
 12 months
- Product must have been produced (reference point: commodity harvest)
- Consolidation of DDS if appropriate documentation is available

European Commission, FAQ, version 1.4 as of April 2025, No 5.19



Contact



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Interview Study by WWF and Nextra Overview of the Results: Implementing the EUDR in Brazilian-German Supply Chains

Janika Ofterdinger | Nextra Consulting









From Regulation to Reality: Implementing the EUDR in Brazilian-German Soy Supply Chains

Overview of Research project by WWF Germany

15.10.2025



Interview Study



Research Question

What are the key challenges and practicable approaches for the successful implementation of the EUDR for actors along different stages of the Brazilian-German soy supply chain?

- Challenges & Needs of Different Actors
- Expectations and Needs Between Stakeholders Along the Supply Chain
- Practicable Approaches & Solutions

Methodology:

- The study builds on current findings of central research projects and dry runs.
- Multi-stakeholder analysis using interviews, questionnaires, and site visits.



Recap: Workshops at FONEI in April



The participatory approach of the study conceptualization enabled a practice-oriented focus of the study.

Legality condition of the EUDR

(Which laws are relevant and evidence sufficient?)

Certifications

(Which concrete criteria can certification cover/support with due diligence process?)

Impact

(How can be ensured that the EUDR is serving to have a positive impact in Brazil instead of just "cleaning" EU supply chains?))

Downstream actors and "ascertain"-responsibility (What role do downstream actors play to ensure DCF-soy supply chains?)

Identifying Deforestation

(What is the right methodology to ensure there was no deforestation?)

Segregation

(How much segregation is needed to ensure DCF- and EUDR-compliant soy?)

Level Playing Field EU

(How is ensured that all competent authorities across the EU have the same criteria and quality in controls?)

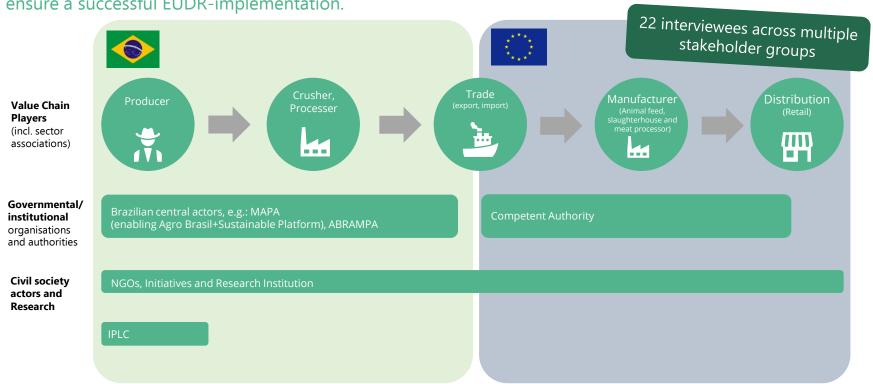
Acceptance in Producing Countries

(How can acceptance of the EUDR in producing countries be strengthened?)



Interviewees to identify Hurdles and Solution Approaches

The study included perspectives of central actors from value chain and organisations that are relevant to ensure a successful EUDR-implementation.



Overview of Structure and Key Outcomes



The study identified key hurdles and gathered solution approaches and good practices for identified issues.

Deforestation-free production

• Uncertainties in data gathering (e.g. sharing of geolocation data along the supply chain) and analysis for deforestation

Legality

- No EU/ Competent Authority approved list for EUDR legality criteria and evidence
- Challenges in legislation and its enforcement in Brazil (e.g. environmental protection, land use and IPLC rights)

Due diligence

· Practical implementation of data aggregation in the context of declaration in excess

Impact

- Conversion of other natural ecosystems
- Risk of potential trade stream shifts and circumventions









A shift between hurdles: Progress on geolocation and uncertainty on legality

Systems within Brazil: A duality of promising tools and gaps in regulatory systems



Ensuring impact:

holistic alignment

Overview of Key Outcomes











A shift between hurdles: Progress on geolocation and uncertainty on legality

- Industry acknowledges impulse of the EUDR to manage geolocation data:
 - Significant progress has been made to clarify aspects around collection and management of geolocation data for soy production.
 - Remaining hurdles that companies are currently engaging within their supply chains concern indirect soy suppliers of traders and downstream actors' access to geolocation data.
- The interpretation of the EUDR's legality requirements has now emerged as the foremost concern:
 - Scope of Legislation: Which Brazilian laws to consider for EUDR-compliance?
 - Proof of Compliance: What evidence will be accepted as sufficient for EUDR?

EU quidance on legality criteria should be developed in collaboration with independent stakeholders from producing countries to ensure impactful approaches.

Clear mapping of legal system in Brazil and guidance for due diligence systems on legality aspects in the context of EUDR was developed by ABRAMPA.



Overview of Key Outcomes









Systems within Brazil: A duality of promising tools and gaps in regulatory systems

Brazil offers promising systems:

- Brazil has existing and promising systems and is making progress in supply chain traceability and transparency for commodities
- Monitoring & traceability related systems, e.g.: PRODES, AgroBrasil+ Sustentável, SIFMA Selo Verde, ...

Persistent gaps in Brazil's regulatory framework and enforcement:

- EUDR's condition for legal production shines important spotlight on remaining weaknesses of Brazil's regulatory framework and law enforcement, e.g. implementation and validation of the Rural Environmental Registry (Cadastro Ambiental Rural, CAR)
- Weak recognition of IPLC territories and lacking protection of IPLC rights

TODAY: WWF Brazil

TODAY: Cerrado Network & APIB

EUDR's legality condition exposes weaknesses in regulatory systems and enforcement, highlighting the need for context-specific information and evidence, clear advocacy and multi-actor collaboration.

To ensure best impact of EUDR, systems integrating land, social, environmental, fiscal, and production data should be **developed and supported in Brazil.**

Overview of Key Outcomes









Ensuring impact: From compliance of volumes to a holistic alignment

Strategic imperatives:

- EUDR has to be treated as part of a wider DCF (Deforestation- and Conversion-Free) strategy in the private industry, while making use of improved measures that are set up to achieve compliance
- To ensure impactful transformation, efforts by all actors must extend beyond EU trade volumes, both at the
 company level (e.g. transitioning all operations and entire suppliers instead of specific volumes) and through
 international collaboration of governmental actors (involving producing countries and major consumer markets
 such as China)
- Combine corporate action, national systems, and landscape-level and multi-stakeholder initiatives to ensure system-wide transformation

The EUDR is widely acknowledged by stakeholders as an **important impetus for developing tools, traceability mechanisms, and measures that extend beyond** compliance and address long-standing traceability gaps in soy supply chains.

Implementing **DCF-commitments and -strategies beyond compliance** is more important than ever to leverage positive impact.







Thank you!

Any questions, please contact:

WWF:

<u>Entwaldungsfreie-Lieferketten@wwf.de</u>

Nextra Consulting, Janika Ofterdinger Janika.Ofterdinger@nextra-consulting.com

Legality in the context of the EUDR:

Brazilian Legislation relevant for the EUDR and Implications for Due Diligence Systems (with Q&A)

Dr. Luciano Furtado Loubet | Abrampa

The importance of Indigenous Peoples and Traditional Communities in strengthening socio-biodiversity through their ways of life

Ricardo Terena | *APIB*Dr. Jaime Siqueira | *Cerrado Network*









Introduction of ABRAMPA



65,52 Mil Total Number of Environmental Class Actions 58,16 Mil **Environmental Class Actions** from Procecuters

The Brazilian Prosecutor's office differential:

Autonomy: Independence from the three powers (legislative, executive and judiciary); Criminal liability (as usual) and **civil liability** (the difference)

ABRAMPA:

Largest thematic association of the Public Prosecutor's Office in Brazil

27 years of existence

brings together **30 public prosecutor's offices** (federal, state, audit/budget, and labor)

Trains members of the public prosecutor's office and public agents from environmental agencies

Acts based on projects, especially in **combating crime and illegal deforestation** in the biomes: Amazon; Cerrado; Atlantic Forest; and Caatinga;

Guidelines for EUDR





ENVIRONMENTAL
DUE DILIGENCE
GUIDELINES
FOR PURCHASES
OF BRAZILIAN
PRODUCTS BY THE
EUROPEAN UNION

ACCORDING TO REGULATION (EU) N°. 1115/2023^{1,2}



EUDR-GUIDELINES

Article 3

Prohibition

Relevant commodities and relevant products shall not be placed or made available on the market or exported, unless all the following conditions are fulfilled:

- (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.

+ Legality vegetation suppression







EUDR-Summary

OBJECTIVE: To indicate – in ABRAMPA's view – compliance with environmental law in Brazil (focus on illegal deforestation);

Strategy: To identify high, medium and low risk situations (to be assessed in due diligence by the financier)







Overview: Risk of Illegality

- Low risk of illegality: Cases in which existing legal and institutional mechanisms tend to be sufficient to prevent illegalities, requiring only the adoption of the simplest standardized practices;
- Medium risk of illegality: Cases in which illegalities may occur, requiring caution and the adoption of additional due diligence measures;
- High risk of illegality: Cases in which the occurrence of illegality is practically certain, necessitating confirmation of whether the environmental irregularity persists or has already been remedied;
- Very high risk of illegality (insurmountable or "non-negligible" risk, under Regulation (EU) No. 2023/1115): Cases in which there is non-compliance with basic requirements of Brazilian legislation, rendering the purchase of products under Regulation (EU) No. 2023/1115 impossible.







Summary of Main Points

1.2. Legal instruments for prior control of deforestation and guarantee of environmental regularity of properties and productive activities in Brazil:

- Rural Environmental Registry (CAR)
- •Environmental licensing and authorizations for vegetation removal (compliance of rural properties).



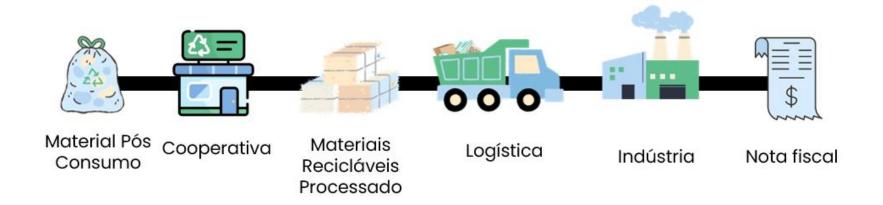
Summary of Main Points

- 1.4. Legal instruments for traceability of Brazilian production chains:
- Mechanisms for tracking the origin of agricultural and forestry products - demonstrating that they do not come from illegally deforested areas;
- •Explains how the Sustainable Forest Management Plan (PMFS), the DOF/SINAFLOR System and the native wood traceability code work.
- It deals with traceability through the Animal Transit Guide (GTA), SISBOV and initiatives such as the MPF's Legal Meat Program.

Challenges: <u>Due to the fragmentation of the chain</u> and the lack of mandatory individual traceability.

Eletronic Invoice (→ SISREV);

Example Recycling: Process of Verification









Summary of Main Points

- 1.5. Administrative and judicial responses to environmental crimes:
- Analyzes sanctioning mechanisms (infringement notices, embargoes, legal actions) as essential sources for assessing the environmental regularity of properties and activities.
- 2. Challenges to the effectiveness of legal controls on environmental compliance and traceability of production chains
- •Weaknesses in existing systems:
 - such as the lack of CAR validation;
 - the slowness of licensing and authorization processes and the absence of integrated systems.



Contributions

(iii) Due diligence recommendations:

•Checking the status of the CAR: Assess not only the existence of the registry, but also its analysis by the environmental agency, in addition to cross-referencing it with data on overlapping protected areas.

•Consulting licenses and authorizations: Confirm the existence of valid environmental licensing and authorization for vegetation removal. Require complete documentation.



Contributions

(iii) Due diligence recommendations:

Using remote sensing data: Tools such as PRODES, DETER, MapBiomas, SAD Imazon and others are recommended to check whether there was deforestation after 12/31/2020.

Searching for embargoes, infraction notices and lawsuits: Consult IBAMA databases, state and federal courts to identify possible irregularities or ongoing lawsuits.



Contributions

(iii) Due diligence recommendations:

Document analysis in production chains:

Georeferenced tracking: Require geolocation of production areas, as provided for in the European Regulation.

Incentive for land and environmental regularization: Support public policies that promote the formalization and legality of rural properties.

In the timber sector: Verification of PMFS, DOF and tracking code.

In the livestock sector: Verification of GTAs, crossreferencing with CAR and platforms such as the "Green Seal" and the MPF Protocol (Legal Meat).



Risk Degrees of different Hyptheses

HYPOTHESES	RISK DEGREE
Property registration and CAR with discrepant geolocation data	Very high risk of illegality
CAR, environmental licenses and authorizations, DOF, and GTA with discrepant geolocation data	Very high risk of illegality
Notice of violation, embargo or legal action relating to the property(ies) indicated as the origin of the product	High risk of illegality
Notice of violation, embargo or legal action relating to other property(ies) in the name of the owner/possessor of the property(ies) indicated as the origin of the product	Medium risk of illegality
Property(ies) indicated as the origin of the product with analyzed and active CAR	Low risk of illegality
Property(ies) indicated as origin of product with pending, suspended or canceled CAR(s)	Very high risk of illegality
Property(ies) indicated as origin of the product with unanalyzed and active CAR	Medium risk of illegality
Property(ies) indicated as the origin of the product with CAR not analyzed, active and overlapping Conservation Units	High risk of illegality



Strategies for the Future

Expansion to the entire Cerrado biome (very important: Forest concept x Savana - illegality);

Strengthening dialogue with production chains (now – projeto cerrado);

Strengthening Public Prosecutor's Offices to combat deforestation;

Positive instruments (Payment for Environmental Services – PES, carbon credits, biodiversity credits, self-reporting, among others).





Opportunities

Contact with the European Union;

Apply Know-how from the Amazon to the Cerrado (Brazilian Savana Forest);

COP 30 - Belém;

Regulation of the Carbon Market - Brazil;

Contact with the European Network of Environmental Public Prosecutors and the Latin American Network.









Agro-Environmental Legal Project

Sustainability in the Agribusiness Production Chain

















Project Area of Interest

- Region MATOPIBA = Maranhão + Tocantins + Piauí + Bahia
- Only in the Cerrado biome
- Municipalities: 325
 - MA = 128
 - >TO = 126
 - PI = 46
 - >BA = 25

Alerts in the Project Area

- 52,588 alerts from Mapbiomas (2019– 2024), with 4,823 occurring in 2024.
- 42.562 (80,93%) are overlapping with a registered property in SICAR.







Deforestation Reports produced by the Project

Production of over 300 reports by the project;

Guidelines and Training;







Creation of the "MP Desmate Zero" Platform (UFMG)





MPMA

Ministério Público

Platform Results

Standardization, Mobilization, Training of Prosecutors;

423 actions and procedures with spatial information of the investigated area;

113 (26.71%) were directly generated by the reports produced by the project;

In Piauí, the ABRAMPA reports represent 95.69% of the actions and procedures with spatial information;

In Maranhão, 100% of the actions and procedures with spatial information were generated by the project.













THANK YOU







Legality in the context of the EUDR:

Brazilian Legislation relevant for the EUDR and Implications for Due Diligence Systems (with Q&A)

Dr. Luciano Furtado Loubet | Abrampa

The importance of Indigenous Peoples and Traditional Communities in strengthening socio-biodiversity through their ways of life

Ricardo Terena | *APIB*Dr. Jaime Siqueira | *Cerrado Network*



Articulação dos Povos Indígenas do Brasil (APIB)

APIB

Strengthening the unity of indigenous peoples and defending ancestral rights throughout Brazilian territory.



















Who We Are

APIB was created by the indigenous movement during the 2005 Free Land Camp. Held annually since 2004, the ATL highlights the status of indigenous rights and demands that the Brazilian government address their demands.

We are a national reference body created from the bottom up, bringing together seven regional organizations. Our purpose: to strengthen the unity of peoples and mobilize against threats to Indigenous rights.

Legal Department



Institutionalization

Created in 2020 to strengthen organic Indigenous advocacy, aligning judicial action with the movement's decisions.



Presence in Brasilia

Since 2023, we have been working permanently in the capital to influence the judicial, executive, legislative, and international spheres.



Constitutional Jurisdiction

Highlighting his work at the Supreme Federal Court (STF), expanding access for indigenous peoples and structuring indigenous policy through strategic litigation.



Areas of Activity

How we organize to defend our rights

1

Litigation

Representation of APIB, leaders and communities in the Supreme Federal Court (STF) in paradigmatic actions to establish jurisprudence favorable to indigenous peoples.

2

Legislative and Advocacy

Monitoring of proposals in the National Congress and Ministries, dialogue with parliamentarians, technical notes and public hearings.

3

International, Human Resources and Companies

Work in international bodies (Inter-American System, UN, ICC) and strengthening the Human Rights and Business agenda.

The Importance of EUDR



Cocoa



Palm Oil



Rubber



Coffee



Wood



Soy



Beef

Exportações da Agropecuária em Setembro/2025 - US\$ Milhões

							Baixar tabela
	2025		2024			Part.(%) - Total Brasil	
	Valor	MD	Valor	MD	Var.%	2025	2024
A - Agropecuária	6.719,21	305,41	5.693,22	271,10	18,02	22,00	19,99
Soja	3.107,03	141,22	2.585,55	123,12	20,16	10,17	9,08
Milho não moído, exceto milho doce	1.530,71	69,57	1.249,65	59,50	22,49	5,01	4,38
Café não torrado	1.188,99	54,04	1.071,12	51,00	11,00	3,89	3,76
Algodão em bruto	290,58	13,20	304,21	14,48	-4,47	0,95	1,06
Animais vivos, não incluído pescados ou crustáceos	163,99	7,45	111,69	5,31	46,82	0,53	0,39
Demais produtos não listados	437,88	19,90	370,97	17,66	18,03	1,43	1,30

Exportações da Indústria Extrativa em Setembro/2025 - US\$ Milhões

Cases of Violations: Soy and Indigenous Territories

Munduruku of Planalto

Santareno

People: Munduruku

State: Pará (Santarém)

Biome: Amazônia

Problem: Deforestation and

territory surrounded by soybeans

Guyraroká

People: Guarani-Kaiowá

Local: Mato Grosso do Sul

(Dourados)

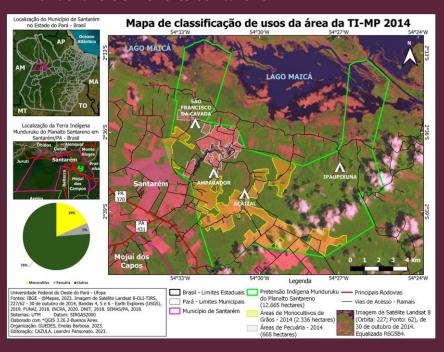
Biome: Cerrado

Problem: Invasion and pressure

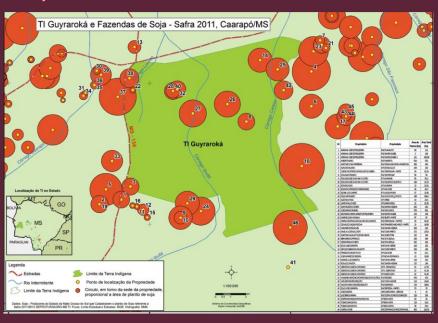
from agribusiness

Territories Under Pressure

TI Munduruku do Planalto Santareno



TI Guyraroká



Cerrado in Mato Grosso do Sul under pressure from the advance of monoculture.

Territory completely surrounded by soybean plantations in the Amazon region of

Pará.

The defense of indigenous territories is the defense of Brazilian biodiversity and fundamental human rights.

Thanks!

Unity and Resistance for a Sustainable Future

We appreciate your time and attention to our cause. The fight for indigenous rights is a fight for all of us, for biodiversity and social justice in Brazil.

Contact

For more information or to support our initiatives:

Email: juridico@apiboficial.org

Tel: +55 (14) 98160-9767

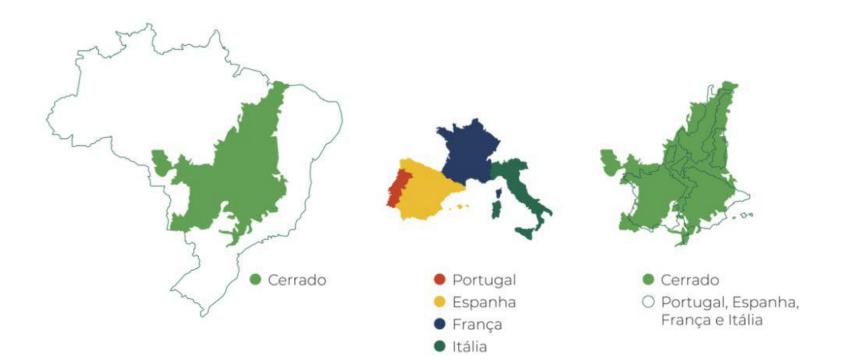
Website: https://apiboficial.org/

Redes Sociais: @APIBoficial / @terenaricardo

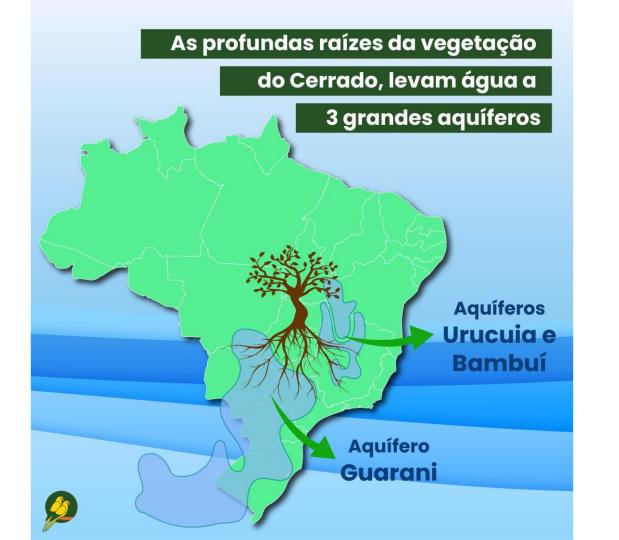






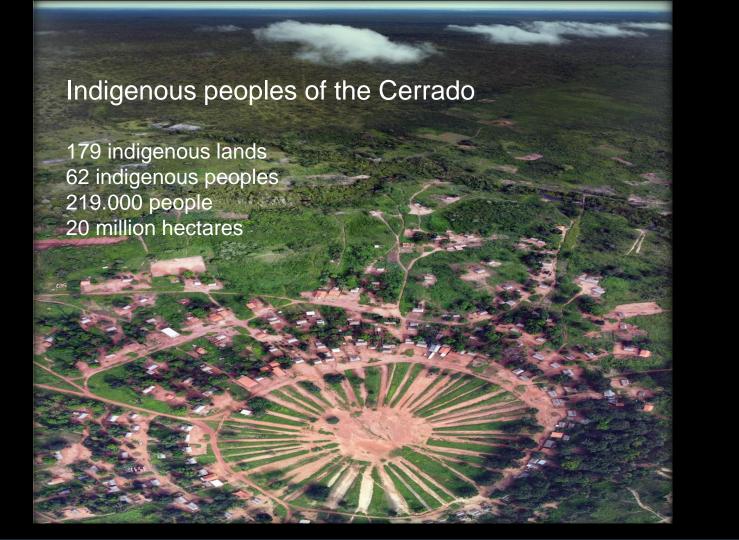












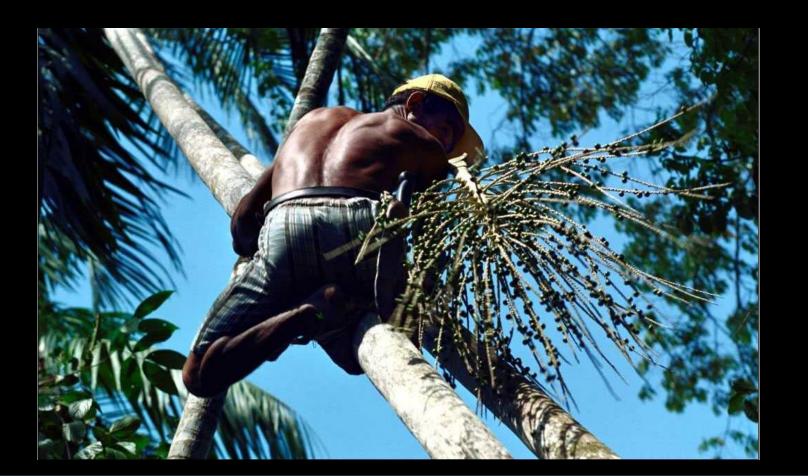
















Cerrado, priceless and threatened wealth

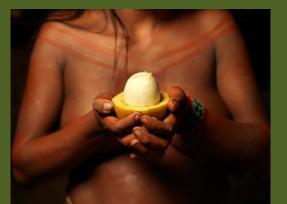


Foto: Acervo ISPN/Peter Caton



Foto: Acervo ISPN/Bento Viana



Foto: Acervo ISPN/Bento Viana



Foto: Acervo ISPN/Peter Caton



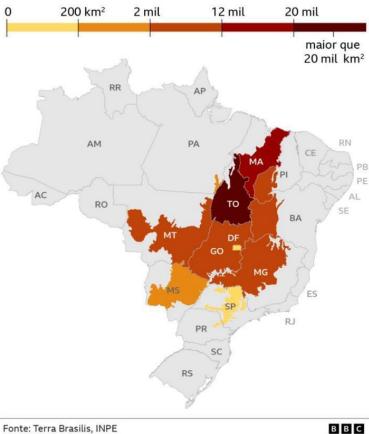
Foto: Acervo ISPN/Peter Caton



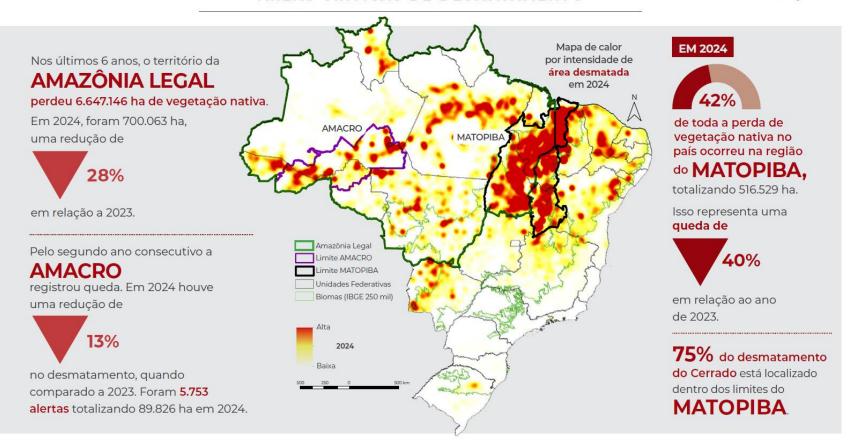
Foto: Acervo ISPN/Bento Viana

Tocantins e Maranhão são campeões de desmatamento do Cerrado

Aumento de desmatamento no Cerrado por estado, de 2012 a 2022



ÁREAS CRÍTICAS DE DESMATAMENTO

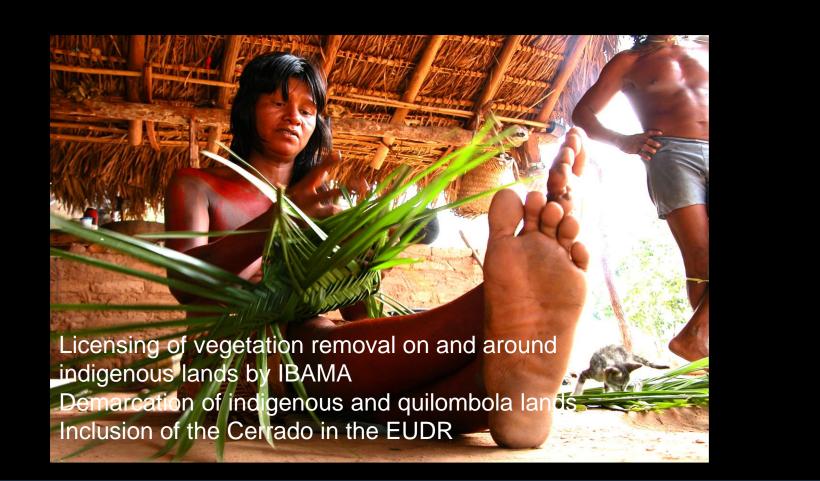
















Thanks !!!

contato@redecerrado.org.br Instagram: @rede.cerrado www.redecerrado.org.br



Data Management in Practice - Lightening Talks & Discussion:

Standardization within the EUDR Context

Peter Uhlig | GS1

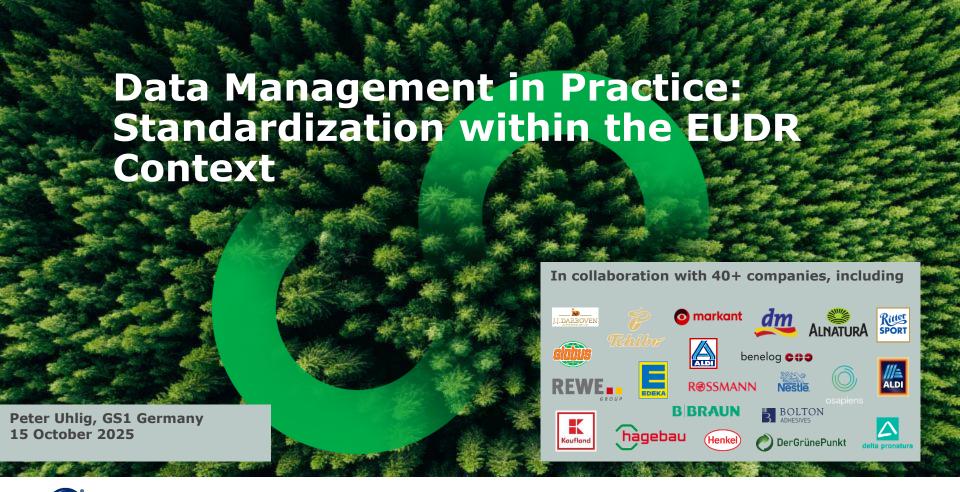
Practices and Tools within the Brazilian Context

André Freitas | WWF Brazil

Insights from Practice: EUDR Implementation in Soy Trading

Fernanda Teixeira Saturni | Louis Dreyfus Company







Over **Millions** Companies use GS1 standards.



100% **GS1 Germany:**

We inspire startups

butterfly&elephant

The Accelerator by GS1 Germany

Around

at GS1 Germany speak over



for identification, recording and Exchange are in the

GS1 portfolio.



Identification standards



Communication

Process standards

Data carrier

standards

Every year, about Category Manager are certified by us.

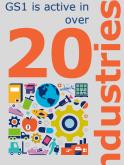


barcodes.

Billion **Barcodes** are scanned worldwide every day.

§ 97.000 Customers use the

Services of GS1 Germany



We believe in the power of standards to transform

the way we

work and live.

For more than is GS1 for Enterprise active worldwide.

The Shopper supermarket as a place of learning: 0

GS1 organizations form the global GS1 network.



Every year, GS1 records around

15.000 Visitors to the

GS1 Germany Knowledge Center.

Innovation Center

Inspiring surface: a unique combination of creative spaces and innovative Working methods.



Standardization as an opportunity



The key to efficiency and effectiveness lies in the use of interoperable standards

USB-C instead of tangled cables

USB-C connectors have been standard for technical devices since the end of 2024

- ✓ Financial relief
- ✓ Simplification in everyday life for consumers
- ✓ Less electronic waste





GS1 Program Data For Sustainability



Data for Sustainability Program: How GS1 Germany supports the implementation

Joint development with 40+ companies from industry, retail and solution providers

Standardised data models for sustainability information enable comparable, interoperable and automatable data collection and sharing.

* Semantic description of data points

Relevant information (e.g. origin, growing region, certifications) is clearly defined to create a common understanding – especially for the FMCG industry.

Contribution to the implementation of the EUDR

- GS1 EUDR Implementation Guideline
- GS1 EUDR Questionnaire Model

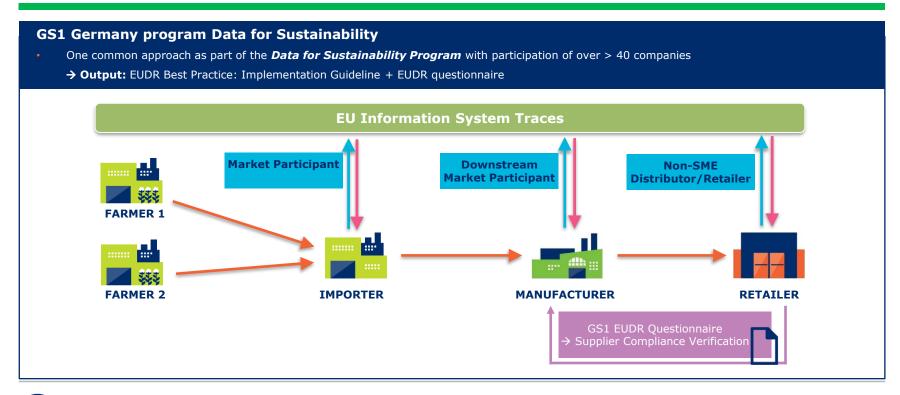




www.gs1.de/eudr



The Implementation Guideline and questionnaire model enable efficient implementation of EUDR requirements





EUDR Implementation Guideline



The EUDR Implementation Guideline explains the data exchange between companies based on GS1 standards



Purpose: Guidance on the implementation of the EUDR with GS1 standards using simple but representative scenarios



Contents

- Data attributes along the supply chain
- Process choreography using GS1 standards (e.g. EPCIS, GLN, GTIN)
- Upstream supplier verification (Questionnaire Model)

Benefit

- Clear orientation for companies
- Harmonization of communication

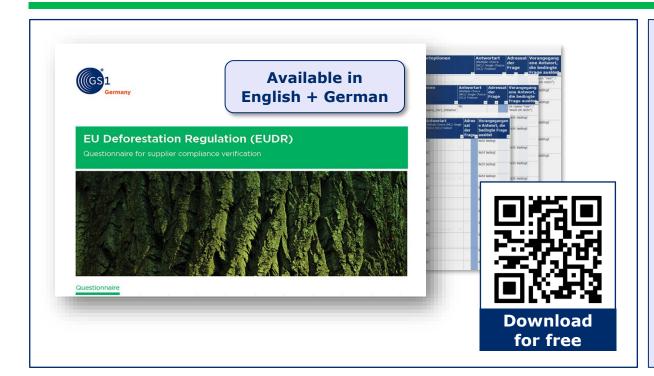




EUDR Questionnaire Model



A standardized EUDR Questionnaire Model increases efficiency and comparability



Purpose

Standardised collection of relevant information

Contents

- · Three modules
 - 1. Company information
 - 2. Management system
 - 3. Supply chain process
- Questions about products, origin, geodata, suppliers
- · Modular and interoperable

Benefits

- · Efficient data collection
- Comparability of data
- Integration into digital solutions



EUDR E-learning

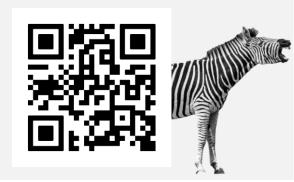




Fit for the EUDR with the GS1 Questionnaire Model More clarity, less effort – Consistent. Understandable. Effective.

This e-learning course demonstrates how the <u>GS1 Questionnaire Model</u> supports compliance with regulatory requirements. With practical and clear explanations, participants learn what's important when using the questionnaire.

Bookable at www.gs1-campus.de





Please feel free to contact us if you have any questions!





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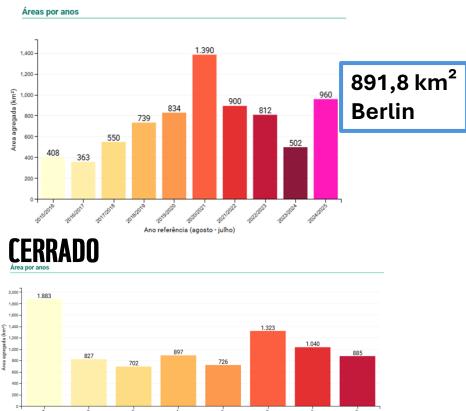
Insights from Practice: EUDR Implementation in Soy TradingFernanda Teixeira Saturni | *Louis Dreyfus Company*





Context updates - Brazil

AMAZÔNIA



Deforestation alerts

CERRADO		AMAZÔNIA
1	15%	1 91%

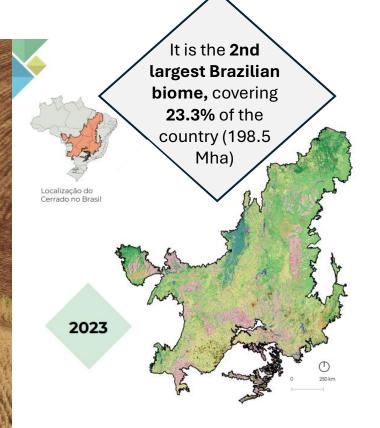
DETER System (INPE): The area under deforestation alerts in the Amazon rose by 91% in May 2025.

76% of deforestation ALERTS in CERRADO occurred in MATOPIBA		
MARANHÃO 28,79%		
TOCANTINS 28,29%		
BAHIA 25,43%		
PIAUÍ 17,47%		

DETER System (INPE): The area under deforestation alerts in the Cerrado (Jan – May 2025).

Cerrado: Land cover and land use in 2023





50,9%Of the Cerrado is cover by Native Vegetation

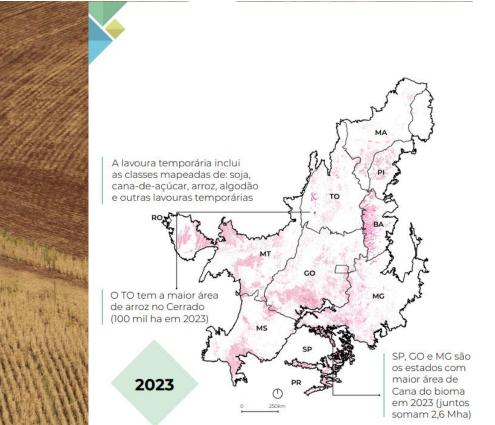
48,3%Of the biome is occupied by antropic use

*Inclui as classes: Mangue, Apicum, Afloramento Rochoso, Praia, Duna e Areal, Silvicultura, Área Urbanizada, Mineração, Outras áreas não Vegetadas e Aquicultura



Temporary Farming in the Cerrado





97% of the agricultural area in the Cerrado is temporary farming

Soybean area in the Cerrado has increased **16x** since 1985

48% of Brazil's soybean planted area is in the Cerrado (2023)



Native Vegetation by Land Category* (1985-2023)





Conservation Units, Indigenous Lands and Quilombolas have more than 93% of native vegetation.

14.7% (15 Mha) are in protected and public areas for collective use.

29.9% (30 Mha)on public lands or without georeferenced land registration, and

55.4% (56 Mha)in private areas with georeferenced land registration.

TRANSPARENCY AND TRACEABILITY AS PART OF THE SOLUTION





It proves good practices, encourages most producers and responsible companies, points out where the socioenvironmental and legality problems are.



Source Control robust best tool to avoid deforestation in chains on a global scale



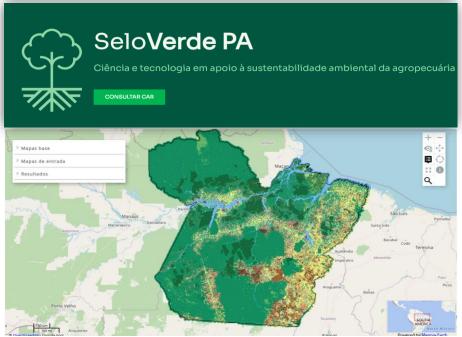
Costs of lost productivity, food insecurity and reputation greater than the cost of origin control

PRIVATE MONITORING SYSTEMS



- They are based on information provided by companies and producers and may contain inaccuracies.
- ➤ They have limited access to important public data, such as the environmental regularity and legality of the conversion of native vegetation.

The existence of public systems of traceability and transparency is fundamental



Selo Verde 1.0 – Pará, 2021

PUBLIC INITIATIVES





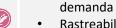
AgroBrasil+Sustentável – 2024

SELO VERDE IN ACTIVITY



- Imóveis: ~ 360 mil
- Atualização: diária
- Rastreabilidade:
 - Soia
 - **Bovinos**







Imóveis: ~ 380 mil

Atualização: sob









- Imóveis: ~ 1 milhão Atualização: trimestral
- Rastreabilidade:
 - Soja
 - Café
 - Cana
 - Floresta Plantada
 - **Bovinos**



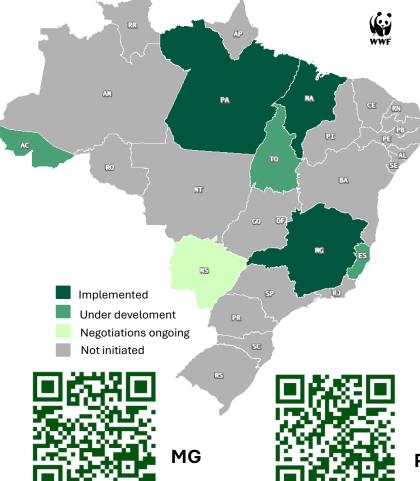


SeloVerde MA

SIFMA

- Imóveis: ~ 121 mil Atualização: sob demanda
- Rastreabilidade:
 - Café
 - Floresta plantada
 - Cacau





PA

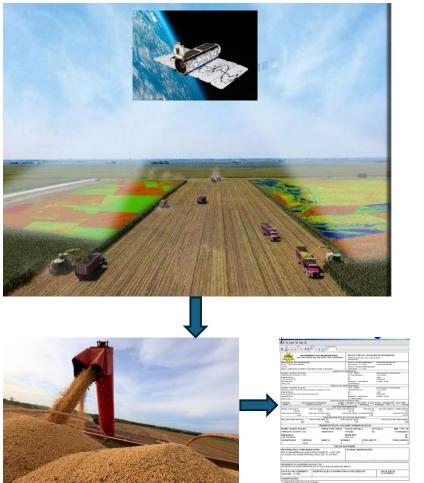
More than 75% of Maranhão's soybeans are exported to China

Port of Itaqui



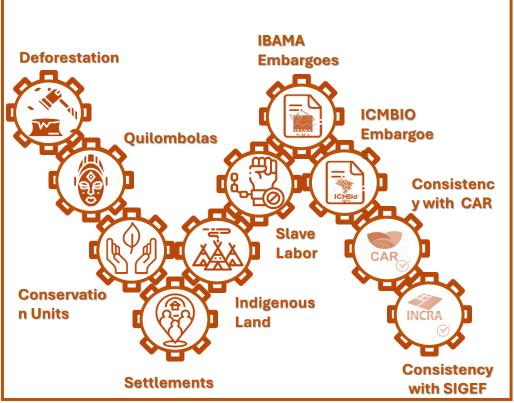
Itaqui - Shanghai: Panama x Strait of Magellan: -10 days

Itaqui - Shanghai: Panama x Cabo B. Expectation: -3 days



SIFMA SELO VERDE MA

Cruzamentos Espaciais dos Dados





=

SIFMA - Sistema de Fiscalização e Monitoramento do Agronegócio e da Vegetação Nativa Conformidade Ambiental e Rastreabilidade da Soja

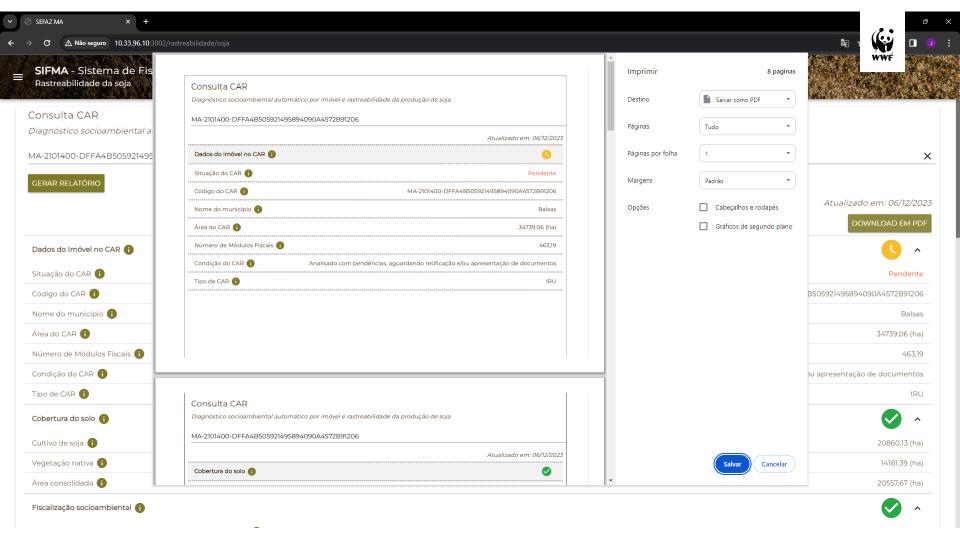
Consulta CAR

Diagnóstico socioambiental automático por imóvel e rastreabilidade da produção de soja

MA-2100055-AD4E640F39F0447285F5B349EF34D863

×

GERAR RELATÓRIO



SIFMA + Selo Verde - Soy Traceability

☐ Integration of different departments of the state of Maranhão;

Free public science-based system

Official traceability information

Separates legal from illegal deforestation

Demonstrate compliance with national and international standards



Provides an environmental compliance diagnosis

Integrates government data

Diagnosis for access to payments for environmental services and benefits from the Safra Plan

CHALLENGES AND OPPORTUNITIES





Ensure territorial rights.



Transform traceability into a positive agenda for attracting investments and business opportunities.



Integration between private and public traceability systems, in a complementary way.



A platform with public, universal and transparent data can be a Global reference for traceability and transparency.



Test the use of the system for the different protocols (EU, UK legislation; private commitments).



Any solution has to be collaborative.



Conclusion – towards full EUDR compliance







Audit tools ready

Multi-stakeholder governance



Data Management in Practice - Lightening Talks & Discussion:

Standardization within the EUDR ContextPeter Uhlig | GS1

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André Freitas | WWF Brazil

Insights from Practice: EUDR Implementation in Soy Trading Fernanda Teixeira Saturni | Louis Dreyfus Company





On the Finish Line Towards EUDR: Challenges & Opportunities for Effective Implementation

Berlin, Oct 15th, 2025







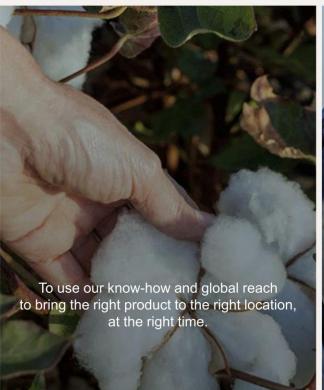
For over 170 years, we have sourced agricultural products where they are grown, and transported, transformed and distributed them for customers and consumers around the world, working with a wide range of trusted partners – from smallholder farmers to global organizations.

Today, as a global agricultural merchant and processor, we provide sustenance for a growing population, helping to supply more than 500 million people each year with high-quality food, feed, fibers and ingredients.



Vision Mission Purpose







Established in

1851

10 platforms

≈18,000 employees

Originating, processing and transporting

≈80 million

tons of commodities annually on average



US\$1,013 million*

Net Income, Group Share

US\$50.6 billion*

Net Sales

Active in

+100

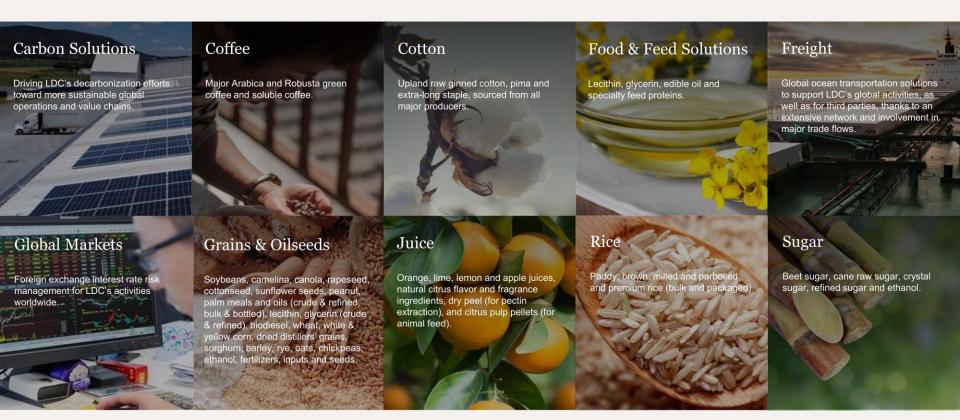
countries



*as of December 31, 2023

Our Platforms





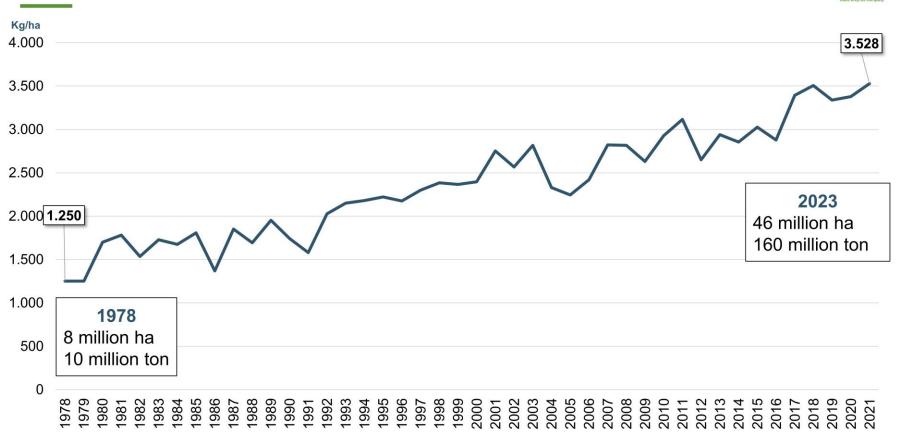


Brazilian Context



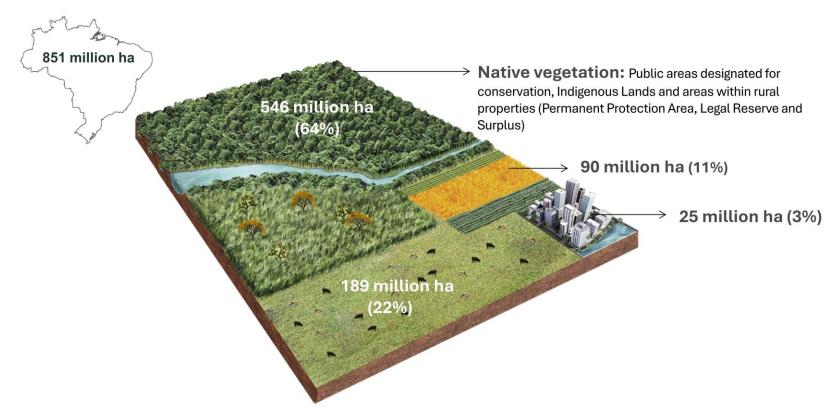






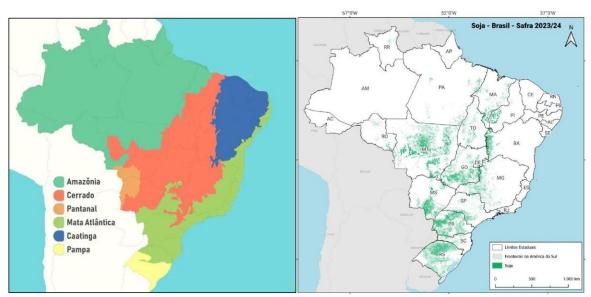
Brasil Land Use





Soybean regions and Area comparision

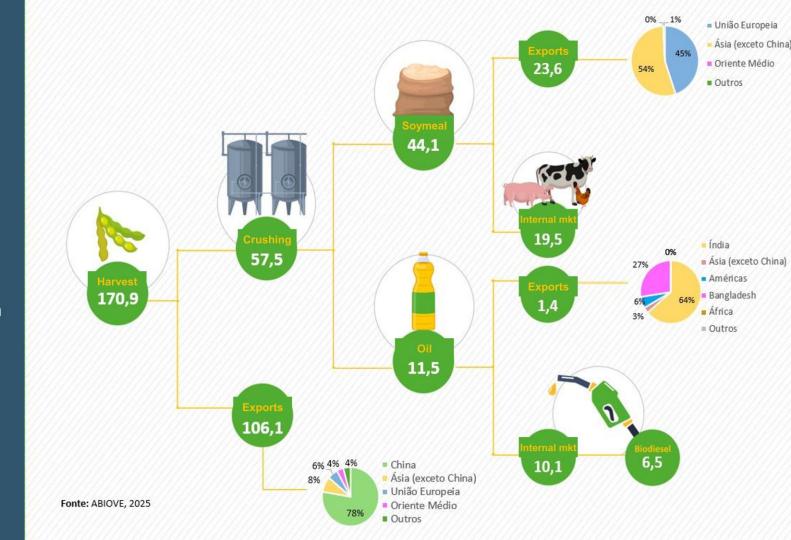




Biomas (IBGE, 2019)	Biome Area And Native vegetation cover (M ha and %)	Soybean Area (M ha 2023/24 harvest)
Amazônia	421 (83%)	8
Cerrado	201 (53%)	24
Mata Atlântica	110 (27%)	11
Caatinga	85 (63%)	19
Pampa	19 (45%)	5
Pantanal	15 (81%)	2
Total	851 (64%)	48

Soybean production chain

Offer and demand in 2025 (million ton)



Brazil's ports exporting grains





11

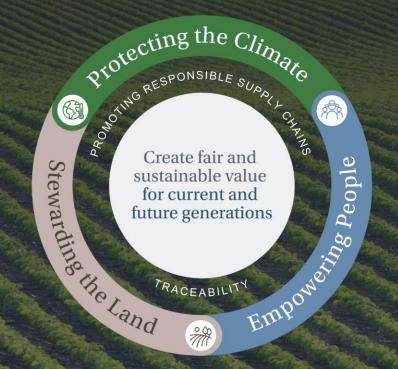




LDC Insights from Practice

Our Sustainability Framework





Our Sustainability Priorities





Stewarding the Land

Eliminate the deforestation and conversion of native vegetation

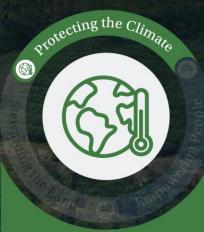
Scale the adoption of Regenerative Agriculture practices



Empowering People

Foster a **safe** and **inclusive workplace**

Advance Human Rights across our supply chains



Protecting the Climate

Reduce **Scope 1 & 2** emissions by 33% by 2030

Reduce the intensity of **Scope 3 emissions** by 20% / 30% (LUC) by 2030

Our corporate commitment



Eliminate Deforestation & Native Vegetation Conversion from global supply chains by End 2025

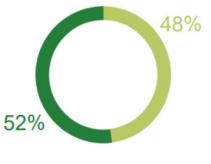
- Covers both deforestation and conversion; covers all supply chains, beyond the so-called high-risk ones (soy, palm, coffee)
- Industry-leading deforestation/conversion cut-off dates:
 November 30, 2016 for palm; December 31, 2020 for soy and other commodities.
- DCF due diligence methodology developed with the support of Proforest and The Nature Conservancy
- Requires crop traceability at national, subnational or eventually farm levels, based on deforestation and conversion risk levels associated with each crop production.
- Published our DCF Methodology and regular progress reporting per commodity/origination region*.



^{*} Methodology and DCF reporting at: https://www.ldc.com/sustainability/land-management/land-use-change/



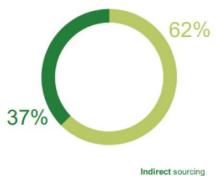




Indirect sourcing
Direct sourcing

Direct sourcing

LDC sourcing profile Cerrado, Brazil

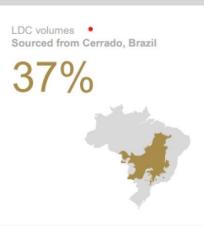


DCF Volumes

Proportion of traceable and DCF volumes of soy sourced from Brazil





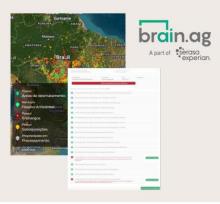


How are we delivering?



Direct suppliers

- ▶ Traceability system that guarantee direct suppliers traceability to Brazil origination.
- Responsible sourcing process to check socioenvironmental criteria compliance.



Indirect suppliers

- Traceability system that extend the traceability to farm level, with data confidentiality possibility.
- Responsible sourcing process to check socioenvironmental criteria compliance.





Certifications

- Sustainable certifications and proprietary sustainable products with external verification
- Deforestation Free, Biofuel, Sustainable Agriculture and Human Rights schemes.
- Mass Balance, national Mass Balance and Credits options.



Regenerative Agriculture

- Project launched in Goiás in 2025
- Already enrolled 10,000 ha
- Includes financial support for the adoption of regenerative agriculture practices, measurement of environmental impacts in the field, and technical assistance to farmers.



EUDR Soymeal Pilot

Due Diligence and Segregation







Origination & Storage

- · Mato Grosso and Goiás States
- · 9 warehouses

Crushing

- · 2 crushing plants
- April and May/2025



Port Terminal & Vessel

- · 2 Port terminal
- · 2 Vessels
- · Polony and Dinarmarc final destination



Main Challenges

- · Proof of legality
- Segregation
- Data management



QGA

Standardization within the EUDR ContextPeter Uhlig | *GS1*

Practices and Tools within the Brazilian Context
André Freitas | WWF Brazil

Insights from Practice: EUDR Implementation in Soy TradingFernanda Teixeira Saturni | *Louis Dreyfus Company*





Panel-Discussion | 15:00

Unlocking Positive Impact in Practical Implementation – Challenges and Approaches

Moderation

Dr. Annette Cerulli-HarmsConPolicy

Guests

Daniel E Silva

Conservation & Traceability Specialist, *WWF Brazil*

Jaime Siqueira

Coordinator of Cerrado Network

Luciano Furtado Loubet

President of ABRAMPA

Wei Peng

Global Head of Sustainability, Louis Dreyfus Company



Supporting EUDR Implementation:

Update of the Soy Certification Benchmark: Overview of the Results

Pavel Boev | *Profundo* Heleen van den Hombergh | *IUCN NL*

EUDR and Beyond: Insights from the Helpdesk's Consulting Practice

Dr. Katrin Merhof | Helpdesk on Business and Human Rights





Soy VSS Benchmark 2025

EUDR readiness update and broader DCF assessment

Introduction, EUDR and the role of VSS/certification standards

- EUDR guidance mentions the **value of third-party verification**, but in practice, it has also distracted attention from voluntary tools already available.
- VSS cannot replace traders/operators' due diligence responsibility, but robust ones are useful tools to support EUDR risk assessment, mitigation, and verification often with extra benefits on top of EUDR.
- Which VSS have shown interest and efforts to offer that service? Are they all ready to go, or are there still some details - or even very basic topics to improve if they were used?
- EUDR alignment has meant **adaptations** of some requirements. Not only CoC options to do full traceability to plot, do checks on no deforestation after 2020, and do checks on legality but also details such as checks according to the EUDR definition of forest or data storage for 5 years.
- This benchmark study gives detailed insight on EUDR readiness (to date) of standards for those who aim to make use of them. For 100 % certified supply chains (our focus and preference), for partly certified but still robustly verified supply chains, or to support responsible production on top of otherwise EUDR-controlled supply chains.





Scope and methodology 1/3

- The benchmark covered 15 standards benchmarked against FEFAC SSG as of March 2025, and 5 standards in the SSG benchmarking process. 2 VSS that were covered by Profundo's 2023 report but did not apply to the FEFAC SSG process were not included (PROFARM Standard and Aapresid's ASC). 2 new standards that did not undergo the SSG process in 2023 but have been benchmarked since then have been included (COFCO and Caramuru Sustentar).
- The 2023 benchmark relied on the VSS self-assessments; the 2025 update instead drew from the latest public standard documents assessed by the research team, while the VSS were then invited to review and comment.
- **Draft assessments were shared with the VSS** to be checked for completeness/objectivity; when evidence was unclear or scores disputed, VSS had to cite and reference exact passages from their standards.
- The feedback was then **checked by Profundo against standard documents** and either confirmed or corrected if the proof was considered insufficient.
- When VSS did not respond, did not provide information, or could not be reached, Profundo fully relied on he publicly available standard documents to produce the assessment. In such cases, the latest published version of a standard was used.
- Based on the resulting complete evaluations, conclusions were drawn on the performance of the VSS against the selected criteria.

Criteria design



Assessme nt



VSS Feedback



WWF review



Final results

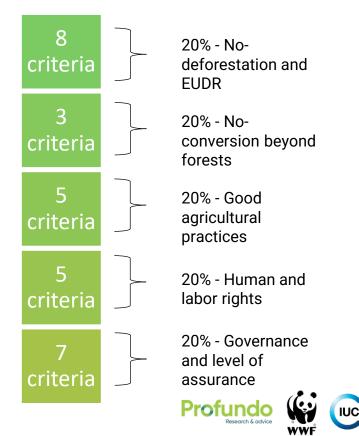




Research methodology 2/3

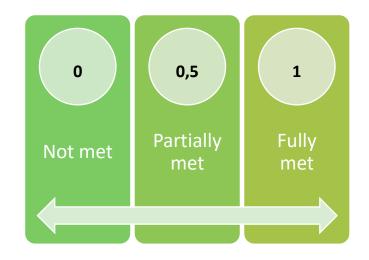
Composition and weights of the criteria across topics





Research methodology 3/3

Each VSS could score a **maximum of one point** for each criterion that it met. If a criterion was deemed **partially met, a 0,5 score** was awarded. This was particularly relevant for some of the more complex criteria, which cover two or more aspects. **Zero points** were given whenever a particular **criterion was not (yet*) met**.









^{*}Yet = at the time when the benchmark was carried out. As standards evolve and adapt to new regulatory and business environment, it may be expected that certain criteria will become covered in the curse of 2025-2026.

Full report to be published soon



Key take-aways

- Though they cannot replace due diligence, robust VSS are useful tools to support EUDR risk mitigation and verification. EUDR-aligned compliance requires at least a segregated chain of custody. Mass balance/book-andclaim alone are insufficient under EUDR, robustly controlled mixed models are possible (100 % EUDR verified, partly certified) and some standards offer such services.
- VSS are adapting to EUDR requirements, and many are keen to support the relevant geolocation, legality, and nodeforestation requirements. Many standards always went and still go beyond EUDR in their no-conversion, social, and Good Agricultural Practices requirements.
- Independent, multi-stakeholder standards consistently outperform corporate schemes on governance, transparency, and third-party assurance; true robustness still hinges on credible verification and field-level controls.
- Since 2023, standards have tightened rules on deforestation/conversion, legality, traceability, and human rights—often via EUDR-oriented add-ons—but terminology and definitions remain inconsistent.
- Traceability is uneven: batch-level tracking, **geolocation linked to plots/dates/quantities**, and comprehensive multi-year data retention are **not yet universal**, limiting EUDR readiness of some standards.
- Agronomic & social safeguards are mixed: GAP/IPM are widespread, but biodiversity protection, living-wage commitments, & anonymous grievance mechanisms show notable gaps.



Thank you!

Check our website www.profundo.nl to see more projects and reports:









Supporting EUDR Implementation:

Update of the Soy Certification Benchmark: Overview of the Results

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EUDR and Beyond: Insights from the Helpdesk's Consulting Practice

Dr. Katrin Merhof | Helpdesk on Business and Human Rights







15 November 2025 / FONEI On the Finish Line Towards EUDR

EUDR and Beyond: Insights from the Helpdesk's Consulting Practice







Introduction

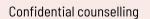
The Helpdesk on Business and Human Rights



A support service offered by the Federal German Government

Funded by the German Federal Ministry for Economic Cooperation and Development (BMZ)







Customised training courses



Events & Webinars



Online Tools

EUDR and Beyond: Insights from the EUDR's Consulting Practice

Direct Dialogue is Crucial



Regulatory Requirements Boost Digitalization (but Guidance is Needed)





Planning Security is Non-Negotiable [should not be negotiable]

Specific Support is Required for SMEs



Regulatory Requirements Must Be Considered Holistically



Thank you for your attention



Further information:

Dr. Katrin Merhof Advisor / Senior Manager Katrin.Merhof@helpdeskwimr.de

<u>kontakt@helpdeskwimr.de</u> <u>www.helpdeskwimr.de</u>





Summary and Key Takeaways

Ulrike Hardner | WWF Germany Janika Ofterdinger | Nextra Consulting





Recommendations and Asks



Governments

EU and Germany:

- Ensure timely start of application of the EUDR
- Expand scope of the EUDR to conversion of all natural ecosystems
- Provide concrete guidance on legality criteria, including independent stakeholders from producing countries
- Strengthen incentives for DCF production
- Strengthen competent authorities and their alignment
- Share learnings of competent authorities

Brazil:

- Strengthen the Brazilian regulatory framework and law enforcement (CAR, IPLC, ...)
- Develop and improve public and national scale solutions
- Implement incentives for DCF production and ecosystem protection
- Implement and strengthen monitoring and traceability systems
- Support local and regional initiatives

Collaboration between countries:

Intensify dialogue between EU and Brazil, multi-stakeholder platform, strengthen and align ambitious sustainability requirements with key consumer markets, implement incentives for DCF production and ecosystem protection



Recommendations and Asks



Private Industry

Political Engagement:

- Advocate for strong Brazilian regulatory framework and law enforcement (central aspects, as: effective implementation and validation of CAR system; strengthen legislation and justice for IPLC).
- Advocate for a strong regulatory framework on the EU side (Position for a timely, reliable and impactful regulatory framework and implementation of the EUDR, as well as expansion of scope to include all natural ecosystems)
- Advocate to strengthen and align the environmental agenda with other consumer markets as China

Advocate to make deforestation- and conversion-free, legal supply chains a standard.

Strong governmental systems and law enforcement are opportunities to reduce both compliance efforts and the risk of non-compliance.



Recommendations and Asks



Private Industry

Due Diligence systems

- Implement DCF strategies beyond EUDR-compliant volumes
- Use context-specific information and evidence for Brazilian supply chains
- Use robust guidance and criteria to assess legality in the Brazilian context (e.g. using ABRAMPA guidance)
- Use EUDR-aligned certification schemes as supportive measure

Collaboration, capacity building and incentives:

- Engage with and support value chain partners within and beyond EUDR scope
- Develop and implement incentives
- Engage to develop and improve (cross-)sectoral and technical solutions
- Engage in local and landscpace initatives
- Share learnings and good practices

Closing Remarks Dr. Annette Cerulli-Harms | ConPolicy



Your Feedback





https://www.menti.com/al18xs8otfdj





Documents presented during the Event

Slides of all inputs will be shared with participants

Links to central documents presented during the event:

- ABRAMPA: <u>Environmental Due Diligence Guidelines for</u>
 <u>Purchases of Brazilian Products by the EU according to</u>
- GS1: <u>EUDR Implementation Guideline and Questionnaire</u>
- Helpdesk on Business and Human Rights: <u>Services</u>

Please reach out to share any additional documents discussed during the event or other central materials that should be included here.





Outlook of Project-Related Activities

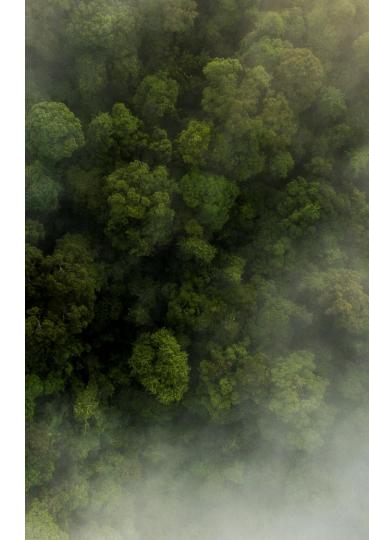
Studies awaiting publication in the next weeks:

- Interview study of WWF Germany and Nextra Consulting "From Regulation to Reality: Implementing the EUDR in Brazilian-German Soy Supply Chains"
- Soy Certification Benchmark by Profundo

<u>Master class series</u> by Collaborative Soy Initiative: Soy sustainability in EU and global trade context

On October 30: 15:00-16:00 CET last session
 Updates, Recap and Q&A







Stay to network!

End of the Event at 17:30 CET

Thank you for your participation.

We look forward to your questions and suggestions: entwaldungsfreie-lieferketten@wwf.de



Forum Nachhaltigere