



NEXTRA
CONSULTING

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

Executive Summary

ABOUT THE STUDY

Learn more in the full report available [here](#).

This is an executive summary of the study “From Regulation to Reality: Implementing the EUDR in Brazilian-German Soy Supply Chains”.

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IMPRESSUM

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INTRODUCTION

GOAL AND SCOPE OF THE STUDY:

The study provides an **overview of central challenges** perceived in the preparations for the EU Deforestation Regulation (EUDR), as well as emergent solutions and overarching implications for stakeholders navigating this new regulatory landscape.



RESEARCH QUESTION:

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

The study draws on current findings from central research projects, pilot exercises and a multi-stakeholder analysis as well as on drawing on qualitative questionnaires, semi-structured interviews, and site visits with a broad range of actors.

With this, the **study aims to bridge the gap** between the **regulatory text** and **on-the-ground realities, offering insights** for the private sector, governmental bodies, civil society, and other stakeholders.



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Soybeans from sustainable production in Brazil.

INTRODUCTION

For related challenges and solutions, see the full study [here](#).

STRUCTURE OF THE STUDY:

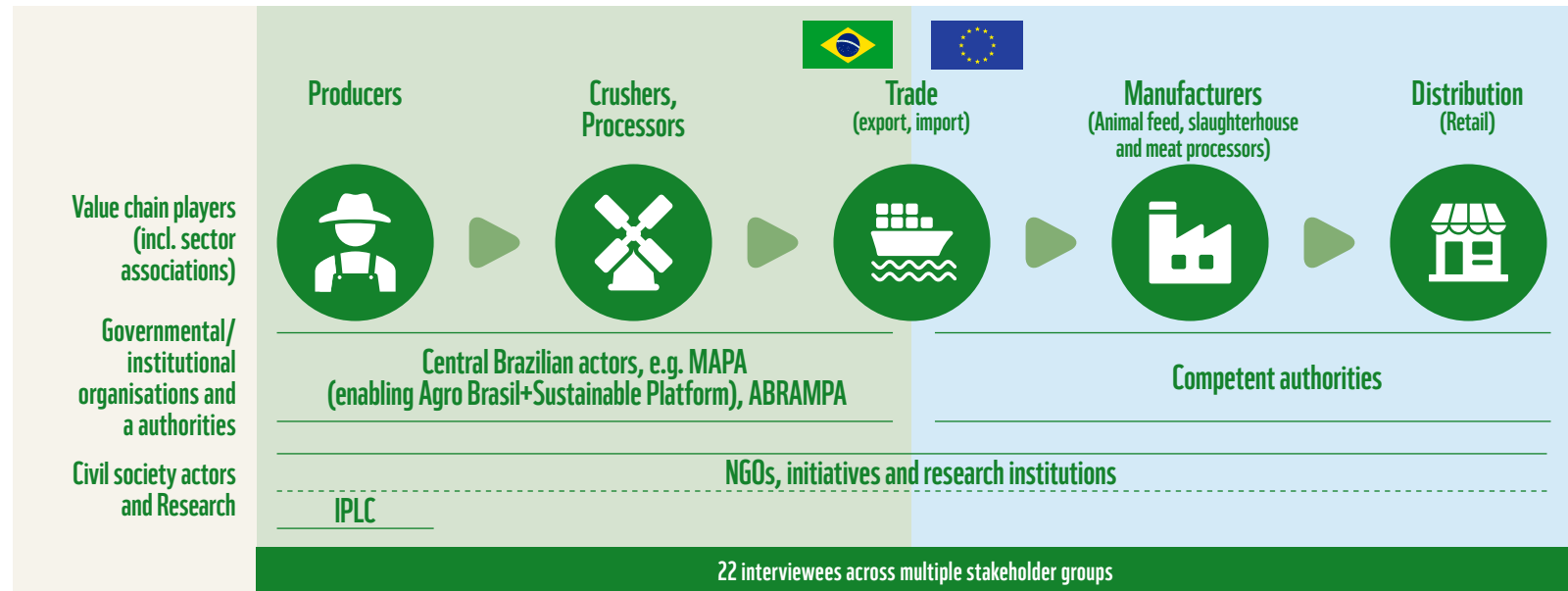
The study is **structured according** to the **key requirements of the EUDR**, focusing on deforestation-free production, production in accordance with relevant legislation, and coverage by due diligence statements as well as an additional chapter on maximising the positive impact of the regulation. Within each chapter, the **study outlines the main challenges** to EUDR compliance. For each hurdle, the study presents an aggregated

overview of proposed solution, which is based on contributions and expectations from different stakeholder groups. While these approaches may not fully resolve every challenge, they provide ways to mitigate them, acknowledging that this study represents the current situation at the time of the research and that systems, practices, and learnings will continue to evolve during EUDR preparation and implementation.

1. CHAPTER: Deforestation-free production	2. CHAPTER: Legality	3. CHAPTER: Due diligence	4. CHAPTER: Impact
<ul style="list-style-type: none"> Data gathering and data analysis for deforestation 	<ul style="list-style-type: none"> General challenges (limitations of regulatory framework and enforcement of laws in Brazil, lack of clearly defined criteria to reach compliance with legality requirements, limited accessibility of socioenvironmental data) Deep dive into land use rights, environmental protection, third party rights, labour and human rights, and FPIC 	<ul style="list-style-type: none"> Mixed soy volumes and declaration in excess 	<ul style="list-style-type: none"> Conversion of other natural ecosystems, risk of potential trade stream shifts and circumventions, and ecological benefits beyond deforestation-free cultivation

METHODOLOGY

AIM AND SCOPE OF THE STUDY:



The study’s methodology is based on a multi-stakeholder analysis to ensure a balanced and comprehensive view of the challenges and solutions in implementing the EUDR

Participating stakeholders represent actors along the entire soy value chain, including producers, processors, traders, manufacturers, and retailers as well as their respective associations. The perspectives of governmental organisations, civil society, research institutions, and Indigenous Peoples and

local communities (IPLC) directly affected by soy production and expansion have been incorporated to ensure a balanced view across stakeholder groups.

Stakeholders shared their insights through interviews, exchange formats, and written input, detailing their perceived challenges, ideas for solution approaches, and the expectations of other stakeholder groups.

KEY FINDINGS

APPROACH:

This **executive summary mirrors the study’s analytical framework**. It begins with the key requirements of the EUDR and then broadens its view to the strategic imperatives necessary to maximise the regulation’s positive impact beyond mere compliance. While stakeholders perceive multiple challenges, the **EUDR has already proved a significant catalyst, advancing traceability and transparency while**

highlighting systemic hurdles. While some challenges stem from uncertainties in the interpretation of the EU’s regulatory text, many are more closely linked to governance systems in producing countries or to shortcomings in ensuring a level playing field. The key findings are summarized **in three subcategories** in the following.

KEY FINDINGS



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:
From compliance of volumes
to a holistic alignment

KEY FINDINGS

For more details, see Chapters 3.1 and 3.2 of the full report



A SHIFT BETWEEN HURDLES: PROGRESS ON GEOLOCATION AND UNCERTAINTY ON LEGALITY

In the early stages of EUDR preparation, stakeholders viewed the technical aspects of data collection as the biggest challenge. As many of these questions have since been clarified and are considered solvable, the interpretation of the EUDR's legality requirements has now emerged as the foremost concern for those needing to demonstrate compliance.

This uncertainty shifts the burden of compliance from the ongoing exercise of geolocation data collection, management, and analysis to a more qualitatively based analysis of legal risks, which requires an understanding of Brazil's domestic systems and challenges.

Actors perceive dual uncertainties:

► **Scope of legislation:**

There is still significant ambiguity as to which specific Brazilian laws the EU and the competent authorities of each Member State will deem relevant for compliance.

► **Sufficiency of evidence:**

It is unclear what levels and forms of evidence will be considered sufficient proof of adherence to these laws.



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In 2020, 5.5 million tonnes of soybeans were exported from Brazil to the EU.

KEY FINDINGS



A SHIFT BETWEEN HURDLES: PROGRESS ON GEOLOCATION AND UNCERTAINTY ON LEGALITY

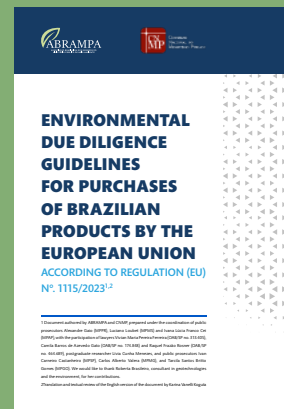
FINDINGS

The Brazilian association ABRAMPA developed a report mapping the Brazilian **environmental regulatory framework** for the EUDR and providing clear guidelines on due diligence systems for companies (Environmental Due Diligence Guidelines by ABRAMPA).

Adding a focus **on social issues**, the WWF developed a guide for companies operating in Brazil (Human Rights Due Diligence Guide by WWF Brazil).

These guidance documents help navigate the landscape around EUDR legality requirements. Uncertainties regarding which criteria EU authorities will consider EUDR-compliant persist for value chain actors.

Environmental Focus: ►
[Environmental Due Diligence Guidelines for Purchases of Brazilian Products by the EU](#)



◀ **Social Focus:**
[Human Rights Due Diligence in Commodity Supply Chains](#)

KEY FINDINGS

For more details, see Chapters 3.2 and Annex I of the full report



SYSTEMS WITHIN BRAZIL: A DUALITY OF PROMISING TOOLS AND GAPS IN REGULATORY SYSTEMS

The only way to effectively implement the EUDR is to consider Brazil's domestic landscape of systems, including its regulatory frameworks, enforcement measures, tools, and sectoral approaches. This landscape is characterised by duality: promising systems such as monitoring tools coexist with gaps in legal frameworks and enforcement.

Structural weaknesses in regulatory frameworks, the enforcement of laws, and implementation systems generate uncertainty about how to provide sufficient evidence of compliance:

- ▶ **Lack of reliability in central systems:**
Persistent shortcomings in the context of the Forest Code, e.g. in the validating processes of the Cadastro Ambiental Rural (CAR), Brazil's system for environmental registration of rural properties, undermine its reliability. Similarly, irregularities have been observed in the processes for granting Vegetation Removal Authorisations (ASVs).
- ▶ **Land and human rights gaps:**
The expansion of soy cultivation remains linked to land grabbing and violent encroachment on the territories of IPLC. Visibility, legal recognition, and protection remain incomplete for many traditional communities.



The dark side of soy cultivation: land grabbing and violent attacks often affect indigenous and local communities.

KEY FINDINGS



SYSTEMS WITHIN BRAZIL: A DUALITY OF PROMISING TOOLS AND GAPS IN REGULATORY SYSTEMS



FINDINGS

Brazil possesses advanced systems and promising tools that can support EUDR compliance:

▶ **“PRODES”**

(high-accuracy monitoring system)

▶ **“Agro Brasil + Sustentável (AB+S)”**

(integrates information from official databases; national level)

▶ **“Observatório Socioambienta”**

(consolidates data on aspects such as human rights violations, deforestation, and commodity production across Brazil; national level)

▶ **“SIFMA Selo Verde”**

(platform combining fiscal management with environmental governance; federal state level)

While Brazil’s tools and stakeholder expertise in the context of the deforestation-free requirement should be acknowledged, the EUDR’s legal production requirement shines a spotlight on the remaining weaknesses of Brazil’s regulatory framework and enforcement of laws.

As many of the identified hurdles are systematic, they should be addressed holistically through, for example, collaborations across stakeholders, advocacy by companies, and by the governmental organisations of Brazil.

These challenges also show that due diligence systems that are put in place by companies in order to comply with the EUDR should be tailored to the Brazilian context to address the remaining challenges.

KEY FINDINGS

For more details, see Chapters 3.3 and 4 of the full report



ENSURING IMPACT: FROM COMPLIANCE OF VOLUMES TO A HOLISTIC ALIGNMENT

The legislative text of the EUDR itself acknowledges that achieving its objective of combatting deforestation requires implementation at scale, which is why it operates at EU level rather than at the level of individual Member States.

Even when the volumes of all EU Member States are combined, it remains apparent that additional, overarching actions need to be taken to achieve the regulation's objectives and amplify its impact beyond EU supply chains.

Some stakeholders perceive the risk that linking soy to deforestation or illegality could cause shifts and simply redirect cultivation from forests to other ecosystems or shift trade routes in areas with a higher risk of deforestation or illegality from Europe to markets with lower sustainability requirements.



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Forest fire in the Amazon rainforest, started to make way for soybean cultivation.

KEY FINDINGS



ENSURING IMPACT: FROM COMPLIANCE OF VOLUMES TO A HOLISTIC ALIGNMENT



FINDINGS

Addressing potential dynamics that diminish the positive impact of the EUDR requires a holistic approach to achieving DCF soy production, with the EUDR representing one element of a broader strategy:

- ▶ Comprehensive engagement, through DCF commitments, policies, and implementation measures that go beyond individual EU volumes
- ▶ Engagement with major consumer markets such as China
- ▶ Actions such as the development of incentive systems, sectoral collaboration, implementation of large-scale traceability tools, and support for landscape-level initiatives



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In order to protect natural ecosystems holistically, a commitment beyond the EUDR is necessary.

KEY FINDINGS



A shift between hurdles:
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Ensuring impact:
From compliance of volumes
to a holistic alignment

CONCLUSION: A PATHWAY TO RESILIENT AND RESPONSIBLE SUPPLY CHAINS

The EUDR has already catalysed substantial progress in supply chain traceability and system development.

The findings of this study confirm that, while **challenges remain, particularly regarding the interpretation of legality**, a general **implementation is perceived as feasible** by most actors. A wide range of solutions, tools, and collaborative approaches is rapidly emerging to address the remaining hurdles.

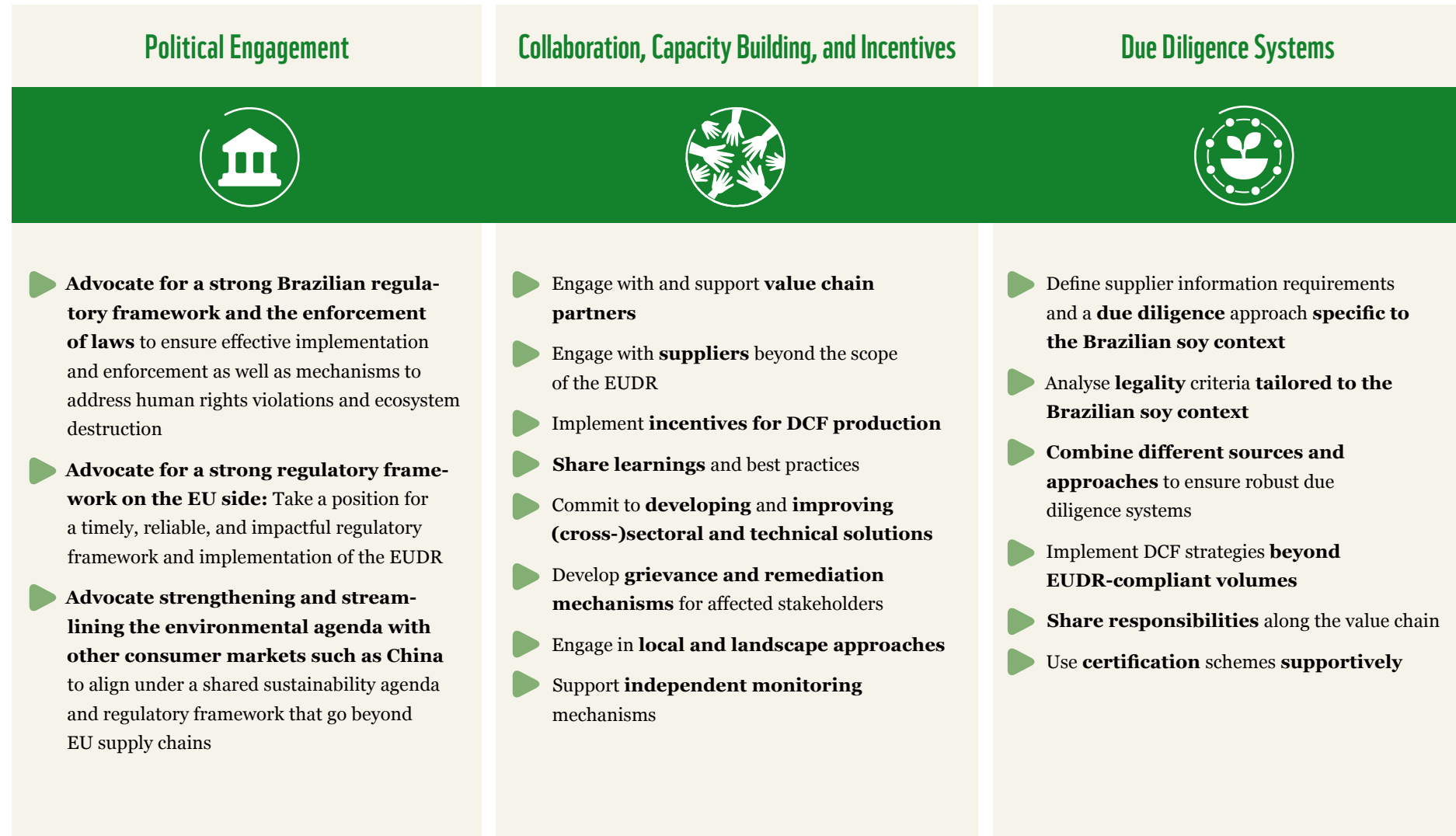
The regulation also serves to **highlight long-standing, systemic challenges**. Some of these hurdles stem from pre-existing weaknesses in governance and enforcement in producing countries, which the regulation now brings into sharper focus. This situation presents not just a challenge, but an opportunity as well.

Ultimately, the **long-term success and scope of the positive impact of the EUDR** depend on stakeholders **using the regulation as a lever to address underlying issues**, rather than simply establishing a parallel “clean” supply chain for Europe. The greatest potential lies in acknowledging the **EUDR as one of many instruments for more sustainability** and embedding its principles within broader, **holistic DCF strategies** that encompass all natural ecosystems and ensure the protection of social rights, such as human and IPLC rights.

OVERVIEW OF RECOMMENDATIONS AND ASKS

For more details, see Chapter 5.1 of the [full report](#)

PRIVATE SECTOR



OVERVIEW OF RECOMMENDATIONS AND ASKS

For more details, see Chapter 5.2 of the [full report](#)

GOVERNMENT

The EU and Germany

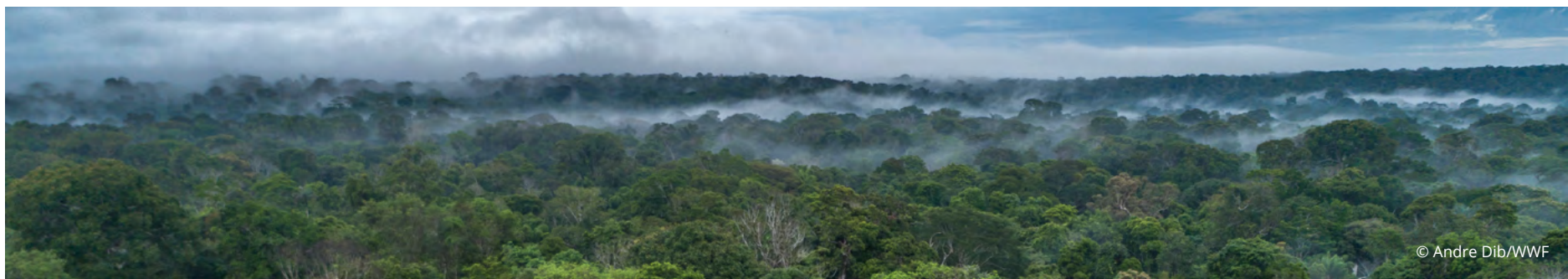


- ▶ Ensure of application of the EUDR **starts promptly**
- ▶ **Expand the scope of the EUDR** to include the conversion of other wooded lands and other natural ecosystems
- ▶ Provide **concrete guidance on legality criteria** at EU level
- ▶ Strengthen **incentives** for DCF production
- ▶ Strengthen **competent authorities and their alignment**
- ▶ **Support** development and scaling of **traceability systems**
- ▶ **Share learnings** with the private sector and among the competent authorities

Brazil



- ▶ Strengthen the **Brazilian regulatory framework and enforcement of laws**
- ▶ Develop and improve **solutions that operate at national scale**
- ▶ Implement **incentives** for DCF production and the protection of ecosystems
- ▶ Implement and strengthen **monitoring and traceability systems**
- ▶ Support **local and regional initiatives**



OVERVIEW OF RECOMMENDATIONS AND ASKS

GOVERNMENT

Collaboration Between Countries:

- ▶ **Intensify the dialogue** between the EU and Brazil to **improve acceptance** and **strengthen impact and practicability** within the **regulation's** implementation
- ▶ Foster multi-stakeholder platforms to enable traceability and transparency
- ▶ **Strengthen** and **align** ambitious sustainability **requirements** with **key consumer markets** (such as China) to achieve DCF supply chains and protect social rights beyond EU supply chains
- ▶ Implement **incentives** for DCF production and the protection of ecosystems



Arrival of a container ship carrying over 100,000 tonnes of soy from Brazil in Amsterdam. The largest shipment of soy ever to arrive in the EU contained soy that had been grown on an area of approximately 40,000 hectares of former forest or grassland.



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