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# From Regulation to Reality:

Implementing the EUDR in  
Brazilian-German Soy Supply Chains

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## ABOUT THE STUDY

This publication was produced as part of the joint project entitled ‘Tackling the main drivers of the deforestation and conversion in Brazil’ between WWF Germany and WWF Brazil. The project is funded by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH via the AgriChains Brazil programme on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ). The content of this study is the sole responsibility of the authors, and the opinions expressed therein do not reflect those of WWF Germany or WWF Brazil or are endorsed by them.

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### Suggestion for citation

Ofterdinger, J., Granzow, M. (2026). From Regulation to Reality: Implementing the EUDR in Brazilian-German Soy Supply Chains. Publisher: WWF Germany. Berlin, Germany

### Acknowledgements

We would like to extend our sincere gratitude to WWF Brazil for their invaluable support and facilitation of this study, with special thanks to Daniel E Silva, André Freitas, Bianca Yukie Maldonado Nakamoto, Laís Ernesto Cunha, Tiago Reis, Jean-François Timmers, Ana Carolina Crisóstomo, and Pablo Majer. We would also like to express our gratitude to the interviewees and partners whose perspectives and practical insights have greatly enriched this study.

### Photo credits

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ISBN 978-3-946211-49-5

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## LIST OF ABBREVIATIONS

Abbreviation	Definition
<b>ABC+</b>	Plan for Adaptation and Low Carbon Emissions in Agriculture (Plano de Adaptação e Baixa Emissão de Carbono na Agricultura)
<b>ABRAMPA</b>	Brazilian Association of Members of the Public Ministry of the Environment (Associação Brasileira dos Membros do Ministério Público de Meio Ambiente)
<b>AB+S</b>	Agro Brasil + Sustentável
<b>AFI</b>	Accountability Framework initiative
<b>APIB</b>	Articulation of Indigenous Peoples of Brazil (Articulação dos Povos Indígenas do Brasil)
<b>ASM</b>	Amazon Soy Moratorium
<b>ASV</b>	Vegetation Removal Authorisation (Autorização de Supressão de Vegetação)
<b>AUAS</b>	Alternative Land Use Authorisations
<b>BLE</b>	German Federal Office for Agriculture and Food (Bundesanstalt für Landwirtschaft und Ernährung)
<b>BMLEH</b>	German Federal Ministry of Agriculture, Food and Regional Identity (Bundesministerium für Landwirtschaft, Ernährung und Heimat)
<b>BMZ</b>	German Federal Ministry for Economic Cooperation and Development (Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung)
<b>CAR</b>	Rural Environmental Registry (Cadastro Ambiental Rural)
<b>CBD</b>	Convention on Biological Diversity
<b>CCIR</b>	Rural Property Registration Certificate (Certificado de Cadastro de Imóvel Rural)
<b>CCM</b>	Cerrado Conservation Mechanism
<b>CMA</b>	Committee of the Environment
<b>CNDH</b>	National Human Rights Council
<b>CNMP</b>	National Council of the Brazilian Public Prosecutor's Office
<b>CNPCT</b>	National Council of Traditional Peoples and Communities
<b>CNPJ</b>	Corporate Taxpayer Registry
<b>CPF</b>	Individual Taxpayer Registry (Cadastro de Pessoa Física)
<b>CPT</b>	Pastoral Land Commission (Comissão Pastoral da Terra)
<b>DCF</b>	Deforestation and Conversion-Free
<b>DDS</b>	Due Diligence Statement

Abbreviation	Definition
<b>EUDR</b>	European Union Deforestation Regulation
<b>FAO</b>	Food and Agriculture Organization of the United Nations
<b>FDaP</b>	Forest Data Partnership
<b>FPIC</b>	Free, Prior, and Informed Consent
<b>GFC</b>	Global Forest Cover
<b>GIZ</b>	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
<b>IBAMA</b>	Brazilian Institute of the Environment and Renewable Natural Resources (Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis)
<b>ILO</b>	International Labour Organization
<b>ILPF</b>	Integrated Crop-Livestock-Forest System
<b>IPAM</b>	Amazon Environmental Research Institute (Instituto de Pesquisa Ambiental da Amazônia)
<b>IPLC</b>	Indigenous Peoples and local communities
<b>ISPN</b>	Institute of Society, Population and Nature
<b>MAPA</b>	Ministry of Agriculture and Livestock (Ministério da Agricultura e Pecuária)
<b>MATOPIBA</b>	Maranhão, Tocantins, Piauí, and Bahia
<b>MPF</b>	Federal Public Ministry (Ministério Público Federal)
<b>OCF</b>	Forest Code Observatory (Observatório do Código Florestal)
<b>RCF</b>	Responsible Commodities Facility
<b>SICAR</b>	National Rural Environmental Registry System (Sistema Nacional de Cadastro Ambiental Rural)
<b>SIGEF</b>	Land Management System (Sistema de Gestão Fundiária)
<b>SINAFLOR</b>	System used for authorisations to remove vegetation (Sistema Nacional de Controle da Origem dos Produtos Florestais)
<b>SME</b>	Small and medium-sized enterprises
<b>TFFF</b>	Tropical Forest Forever Facility
<b>UN</b>	United Nations
<b>UNDRIP</b>	United Nations Declaration on the Rights of Indigenous Peoples
<b>Whisp</b>	What is in that plot



## EXECUTIVE SUMMARY

This study analyses the practical implementation of the European Union Deforestation Regulation (EUDR) in the Brazilian-German soy supply chain. It provides an overview of central challenges perceived in the preparations for the EUDR, as well as emergent solutions and overarching implications for stakeholders navigating this new regulatory landscape. 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.

Im Zeitraum von 2001 bis 2015 war die Ausdehnung der Sojafläche für die Entwaldung von >8 Mio. ha verantwortlich.

The findings are grounded in a multi-stakeholder analysis, drawing on qualitative questionnaires, semi-structured interviews and site visits with a broad range of actors. Participating stakeholders represent actors along the entire soy value chain, including producers, processors, traders, manufacturers, and retailers, as well as their respective associations. Perspectives from governmental organisations, civil society, and research institutions as well as from Indigenous Peoples and local communities (IPLC) directly affected by soy production and expansion have been incorporated to ensure a balanced view across stakeholder groups.

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.

### 1.1 CENTRAL FINDINGS: NAVIGATING THE EUDR IMPLEMENTATION LANDSCAPE

#### 1.1.1 A Shift Between Hurdles: Progress on Geolocation and Uncertainty on Legality

The implementation of the EUDR is a dynamic process, with primary hurdles evolving. 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, the interpretation of the EUDR's legality requirements has now emerged as the foremost concern for those needing to demonstrate compliance.

numerous actors had already established their own targets for achieving deforestation and conversion-free (DCF) supply chains

Prior to the regulation, numerous actors had already established their own targets for achieving deforestation and conversion-free (DCF) supply chains. Traceability was perceived as the major challenge, with shipments which shipments whose exact origins could be determined remaining a clear exception. The EUDR has given powerful regulatory impetus, accelerating and systematizing these pre-existing efforts. Even though some data-gathering and -management challenges persist, issues related to ensuring the deforestation-free requirement of the EUDR in particular are now widely considered solvable. This is also due to the efforts of single companies involving themselves more directly in their value chains, as well as the emergence of practicable tools and collaborative efforts in sector-wide approaches.

Whereas at first, stakeholders pointed to the requirements regarding geolocation data as the main challenge, now the 'legality requirement' has emerged as the foremost area of uncertainty in EUDR-compliance. Actors perceive dual uncertainties:

	
<p><b>1. Scope of legislation:</b> 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.</p>	<p><b>2. Sufficiency of evidence:</b> It is unclear what levels and forms of evidence will be considered sufficient proof of adherence to these laws.</p>

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.



The study was able to gather valuable insights that help make the uncertainty surrounding legal criteria more approachable. In this context, the Brazilian association ABRAMPA, (Brazilian Association of Members of the Environmental Public Prosecutor's Office), 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](#)). Although these documents help navigate this landscape, uncertainties regarding which criteria EU authorities will consider EUDR-compliant persist for value chain actors.

### 1.1.2 Systems Within Brazil: The 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.

On the one hand, Brazil possesses advanced systems that can support EUDR compliance. Initiatives such as the national [Agro Brasil + Sustentável \(AB+S\)](#) platform, the national platform by the [Observatório Socioambiental](#), the federal-state-level [SIFMA Selo Verde](#) approach, and high-accuracy monitoring systems such as [PRODES](#) provide a strong basis and significant capacities to support compliance. On the other hand, structural weaknesses in regulatory frameworks, law enforcement, and implementation systems generate uncertainty about how to provide sufficient evidence of compliance:

	
<p><b>1. Lack of reliability in central systems:</b> 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).</p>	<p><b>2. Land and human rights gaps:</b> 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.</p>



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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 have been put in place by companies in order to comply with the EUDR should be tailored to the Brazilian context to address the remaining challenges.

### 1.1.3 Ensuring Impact: From Compliance of Volumes to a Holistic Alignment

The legislative text of the EUDR itself acknowledges that achieving its objectives to combat 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. Addressing these potential dynamics requires a holistic approach to achieving DCF soy production, with the EUDR

findings of this study confirm that a general implementation is perceived as feasible by most actors.

representing one element of a broader strategy. Comprehensive engagement, through DCF commitment, policies, and implementation measures that go beyond individual EU volumes must be complemented by engagement with major consumer markets such as China, as well as by actions such as the development of incentive systems, sectoral collaboration, implementation of large-scale traceability tools, and support for landscape-level initiatives.

## 1.2 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.

Eine Zahl zur Rückverfolgbarkeit?

größer



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## 2. INTRODUCTION

**The aim of this study is to provide an overview of the main challenges stakeholders perceive in the successful implementation of the EUDR and to gather possible solutions for these challenges.**

The study draws on findings from central research projects and pilot exercises, including the [Olab Study 2024](#) and the [ProForest Study 2025](#), as well as on interviews with stakeholders in Brazil and the EU. Participating stakeholders represent actors across the entire value chain, including producers; processors; traders; manufacturers; and retailers; as well as their respective associations; governmental organisations; non-governmental organisations; non-profit associations; initiatives; research institutions; and IPLC affected by soy production and expansion. Through interviews, exchange formats and written inputs, stakeholders shared insights into their perceived challenges, ideas for solutions and the expectations of the stakeholder groups. These stakeholder perspectives were gathered throughout 2025. Reflecting the developments of the EUDR, the study takes into account the new EUDR amendments as of 19.12.2025 ([EUDR amendments 2025](#)). While the most recent changes within the regulatory text are expected to be accompanied with updated and additional documents including frequently asked questions (FAQ) and guidance, the study draws upon the most recent versions available: FAQ version 4 of April 2025 ([FAQ v4](#)) and the guidance document for the EUDR of April 2025 ([EUDR Guidance Document](#)).



**The study draws on findings from central research projects and pilot exercises**

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 a chapter on maximising the positive impact of the regulation. Many topics are interconnected, and results should be understood holistically, with cross-references to other chapters where especially relevant.

Within each chapter, the study outlines the main challenges to compliance with the EUDR and uses insights from stakeholder interviews to identify potential approaches for addressing them. For each hurdle, the study presents an aggregated overview of proposed solutions, 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 research and that systems, practices, and learnings will continue to evolve during the preparation and implementation of EUDR.

Solutions are consolidated at the end of the study and linked to central stakeholder groups in the form of actionable asks. This structure provides a comprehensive understanding of both the challenges and possible approaches to support the effective implementation of the EUDR.



### 3. MEETING THE REQUIREMENTS OF THE EUDR: CHALLENGES AND SOLUTIONS

#### 3.1 DEFORESTATION-FREE PRODUCTION

##### 3.1.1 Data Collection

The EUDR defines clear data requirements (Art. 9). As a central factor for the analysis of deforestation risks, a production area’s geolocation data must be provided in a GeoJSON format (polygon data; for areas below four hectares, the use of single geolocation points is optional). With regard to the process of gathering and sharing the geolocation data, different hurdles are perceived at different stages of the value chain.

mostly large size of the soy farms in Brazil, the use of the CAR system, and the strong articulation of soy farmers in associations contribute to a capacity to map and provide data

Upstream, at the producer stage, it has been found that some producers are currently not sharing the geolocation data of their production area with clients. One reported reason is that producers **lack knowledge of the market (and its requirements)** that their soy is ultimately supplied to. **A lack of knowledge and capacities to map and provide the required data** may also pose challenges for producers; however, this is perceived as a minor issue, as the mostly large size of the soy farms in Brazil, the use of the CAR system, and the strong articulation of soy farmers in associations contribute to a capacity to map and provide data. If asked to share geolocation data, further challenges can include resistance to transparency and accordingly **the lack of incentive** to make data available. This hurdle accounts not only for the producer itself but for the intermediaries involved as well.

Along the value chain, a lack of information regarding geolocation data is perceived especially when intermediaries between farmers and soy traders are involved. **Indirect supplier relationships are frequently reported to lack traceability** of volumes. **Changes in the supplier base** can make it much more challenging to ensure traceability and compliance. Moreover, there is a concern that some producers, while being fully compliant with EUDR requirements, might still risk exclusion from value chains, not because of deforestation or illegal practices, but due to



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insufficient data or evidence demonstrating their compliance (see also chapter 4.2 Risk of Circumvention and Shifts in Value Chains).

Independently of the EUDR, as soy traders, many midstream actors have defined own targets to eliminate deforestation and conversion from their supply chains. Many of these companies' actions to achieve the targets they

have set themselves go hand in hand with EUDR requirements. One of the biggest perceived hurdles is that within these activities, companies are currently also using **mass-balance options** (in the product portfolio in general but sometimes also in specific contexts, e.g. within regions that are perceived to have a low deforestation risk). The EUDR, on the other hand, **does not allow the mixing of volumes** for the EU market with volumes that are of unknown origin or non-compliant in the context of the EUDR (see EUDR FAQ v4 1.4). Some actors perceive this as challenging, as the soy supply chain involves **mixing at multiple stages** of the value chain.

Within the value chain, there are also uncertainties around which concrete data should be shared in which way and at which stage of the value chain to reduce the risk of non-compliant volumes. Stakeholders report the **lack of a standardised approach to exchanging data throughout the value chain**.

The first actor in the value chain that is required to complete a due diligence assessment under the EUDR is the entity that first places soy (or the relevant product) on the EU market: the operator. To exercise due diligence and submit a Due Diligence Statement (DDS), operators need to include geolocation data. In contrast to the operator, the obligations under the EUDR differ for the subsequent actors in the value chain. The operator is required to communicate the reference numbers of the due diligence statements and declaration identifiers to the next actor down the supply chain (downstream operator or trader) (EUDR Art. 4). Within the EU information system, operators have the **option to determine whether the geolocation data** contained in the DDS is **accessible and visible to downstream actors** (see EUDR FAQ v4 3.6). Actors that follow further down the value chain are not subject to the EUDR obligation of collecting or passing on reference numbers.



### SUMMARY OF PERCEIVED HURDLES:



- Lack of geolocation data from producers (esp. when indirect suppliers are involved)
- Transition from a mass-balance approach to physically compliant soy volumes, even when mixing occurs
- Lack of a standardised approach to exchanging data throughout the value chain
- Downstream actors have a reduced information base (e.g. no access to geolocation data)

### Solutions gathered for perceived hurdles:

#### Lack of geolocation data from producers (esp. when indirect suppliers are involved)

**Understand 'how':** Build capacities and support producers during the transition

- **Inform and engage suppliers:** It is important to ensure that producers are made aware of which information and data need to be provided to ensure EUDR compliance. While geolocation data should be formally required for trade with the EU market, traceability may be requested from all suppliers, beyond volumes connected to Europe.



**It will be possible to handle anything that's technically doable and clearly defined, like collecting and managing geolocation data. The tricky part is when it's unclear what information is actually needed. (Soy trader)**

- **Support suppliers:** Support producers in the preparation for requirements and ensure producers know how to collect geolocation data <https://openforis.org/> and how to register at the CAR; furthermore, provide knowledge of what is concretely required in terms of data. When engaging with suppliers, ensure that beyond requirements for compliance, also overall approach to achieve DCF production is in place.
- **Advocate for and implement governmental systems:** Advocate for and implement governmental policies and systems that improve transparency of environmental, agricultural, and supply chain data, as national or subnational traceability systems. Foster the mapping and management of geolocation data of not just farms but of rightsholders in the entire territory as well, and ensure the validation of said data (see chapter 3.2.1 on issues related to the CAR system). Moreover, to help improve decision-making and guarantee citizens have free access, act in line with the Escazú Agreement's principles of environmental justice.

### Understand ‘why’: Provide incentive and motivation

mostly large size of the soy farms in Brazil, the use of the CAR

- **Implement incentive systems:** Develop and implement clear, accessible, and targeted financial and technical incentives for producers, prioritising high-risk areas, to enable a shift to DCF production while respecting human and IPLC rights. These can range from direct economic benefits defined between actors on the private sector (e.g. price premiums, contractual benefits, ...) to broader financial instruments that promote DCF production, trade, and sourcing at scale. Options include green and sustainability-linked loans and bonds, blended finance, and long-term facilities such as the [Tropical Forest Forever Facility \(TFFF\)](#). Recognising the perceived need for a cultural shift within production practices, multi-year incentive systems that offer economic benefits for protecting natural ecosystems are seen as promising measures to support the transformation. Incentive formats should be designed and supported by stakeholders on the soy and finance sectors, as well as by importing countries and regions (*see also chapter 4.1 for financial mechanisms in the context of protecting ecosystems and re-taking degraded areas*).

mostly large size of the soy farms in Brazil, the use of the CAR

- **Educate on risks & benefits:** Exchanges and capacity building carried out to implement the EUDR should strengthen the stakeholders’ understanding of the risks of deforestation and the benefits of protecting natural ecosystems. Actors along the soy value chain should have a genuine interest in preserving land and avoiding purchases from land grabbers or of converted areas – not just because of the social and ecological benefits but also for strong economic reasons. Stopping the destruction of ecosystems is essential for agricultural systems’ resilience to climate risk: it ensures climate stability, supports successful harvests, and prevents water scarcity, all of which ultimately secure the long-term viability of businesses at all stages of the supply chain. Data transparency and traceability are key enablers, and the EUDR can act as a driver for the necessary systems. Actors who are motivated by genuine commitment rather than only by compliance pressures are crucial for achieving a broader impact. Strengthening an awareness and understanding of the risks and benefits among producers and companies should therefore be a priority.

mostly large size of the soy farms in Brazil, the use of the CAR

- **Foster collaboration between the EU and Brazil:** The dialogue between EU bodies and producing countries such as Brazil should be intensified to improve acceptance and buy-ins by agricultural actors, as well as to strengthen impact and practicability within the implementation of the regulation. Multi-stakeholder platforms, initiatives, tools, and systems should be fostered to enable a transparent supply chain with traceability from its origin, secure DCF supply chains, and eliminate the related abuse of human and IPLC rights.

mostly large size of the soy farms in Brazil, the use of the CAR

- **Implement holistic strategies:** Ensure holistic approaches to achieving DCF supply chains and respecting social rights that go beyond securing limited DCF volumes for the EU or focusing only on direct suppliers (aligned with the [Accountability Framework initiative \(AFi\)](#)). The priority should be on enabling the transition of entire businesses across all operations, rather than isolated product streams. This requires applying the same criteria to both direct and indirect value chain partners and cascading requirements upstream (greening suppliers), engaging the full value chain with particular attention to non-compliant and high-risk actors, which include indirect suppliers (see [example on factory-level of a Unilever plant in Brazil’s Pouso Alegre region](#), where supply conditions were enlarged to indirect suppliers to enable a DCF-factory).

mostly large size of the soy farms in Brazil, the use of the CAR

- **Engage indirect suppliers:** Midstream companies are implementing multiple strategies in parallel to improve traceability in indirect supply chains, including setting clear targets for traceability on indirect supply chains, engaging and supporting suppliers and intermediaries to implement traceability systems and provide data as well as engaging in sectoral and landscape approaches to improve practices on larger scale. Investments and a long-term strategy are needed to engage with indirect suppliers. Companies should monitor and publish their action plan regarding their engagement with both the direct and the indirect supply chain and report on progress (e.g. reporting and monitoring the share of products whose origin is to a production unit, such as a farm or plot of land (see also Imaflora, TNF, WRI, the WWF Brazil guide on [Minimum Monitoring Criteria for DCF Products 2025](#)).

mostly large size of the soy farms in Brazil, the use of the CAR

- **Develop sector-wide solutions:** Sector-wide solutions to manage geolocation data and increase traceability ease the burden on individual companies and are necessary to broaden the positive impact. They should be developed and supported actively by value chain actors along the entire supply chain. Positive examples include the SIFMA system (*see Annex I: Tools in Brazil*), which holds significant potential for being scaled up into a broader federal approach.

mostly large size of the soy farms in Brazil, the use of the CAR

- **Use ambitious certification systems as supportive measure:** Certification schemes with supply chain models with physical traceability can support risk assessment and mitigation under the EUDR. The criteria and level of ambition of each certification scheme should be assessed carefully to ensure the latter covers DCF requirements and social rights aligned with the [AFi](#) (for further guidance, see also the study of benchmarking soy sustainability standards by [Boev et al. 2025](#)). While certification cannot replace due diligence obligations, and companies remain fully liable for compliance, it can strengthen sustainability when applied as a complementary tool.



### Transition from a mass-balance approach to physically compliant soy volumes, even when mixing occurs

- **Use a ‘declaration in excess’ for compliant volumes:** To ensure credible DCF claims, physical traceability is a necessity. Methods such as mass balance remain inadequate in fighting deforestation, conversion, and human rights violations, as abuse remains unchallenged at the origin while products are traded as compliant (see also AFi on mass-balance in the context of the [consultation brief](#) and in the [guidance on land use change and emissions](#)). In the context of the EUDR, the regulation prohibits a mixing with volumes that are of unknown origin or non-compliant with the EUDR. If companies work towards a general increase in volumes that are traceable and were produced legally and without deforestation before 2020, the mixing of different volumes is not a problem. The EUDR explicitly permits a ‘declaration in excess’, allowing companies to include more land plots in their DDS than are actually used for producing the specific volume they have declared (see chapter 3.3.1 and the [ISEAL report](#) for further information). To facilitate the mixing and trading of volumes between different actors (as is currently done within the soy trading market), companies should engage in the development of sectorial approaches at a deeper level to align on how to meet EUDR criteria and automate processes.



### Lack of a standardised approach to exchanging data throughout the value chain

- **Use standards for base data:** As part of the Data for Sustainability Program, GS1 Germany teamed up with companies from trade and industry to develop an approach that aims to enable a much more standardised procedure for companies dealing with the EUDR. The GS1 EUDR guidelines describe concrete data attributes that need to be communicated between supply chain partners to comply with the EUDR. It differentiates between different scenarios: 1) non-EU farmer to EU importer; 2) EU importer to EU non-SME manufacturer; 3) EU non-SME manufacturer to EU non-SME retailer. When using the standardised data and its attributes, it should be taken into account that the guidelines serve as a baseline, and that additional data and information need to be gathered depending on context and risk.
- **Test and roll-out suitable technologies:** Blockchain technology has not just been discussed within the sector, it has also been implemented successfully in different pilot projects, e.g. a [project by CJ Selecta, Wholechain and Biomar](#). These approaches should not merely be scaled up at company level; instead, the sector should collaborate to reach industry-wide solutions.

- **Data protection:** When developing approaches to share data and information throughout the value chain, it is essential to respect data rights and the ownership of data, especially regarding relevant stakeholders at the beginning of the value chain, including IPLC.



### Downstream actors have a reduced information base (e.g. no access to geolocation data)

- **Ensure access to core information for downstream actors:** Some operators are considering providing downstream companies with a general due diligence report, outlining the data sources and methodologies applied in their processes, without passing on primary information. These types of report can serve as a first step in assessing the quality of the due diligence approach. To improve credibility and ensure sound due diligence systems, downstream companies should in general still request access to core data (such as geolocation information) and additional data, for example in the context of random samplings or upon request.
- **Check the due diligence systems of suppliers:** Instead of relying on the due diligence systems of suppliers, downstream actors should take action themselves and verify whether an operational and up-to-date due diligence system is in place at supplying companies. GS1’s EUDR questionnaire can help downstream actors collect additional information from their suppliers (e.g. in regular reviews for ascertaining due diligence systems) while minimising the effort required from the companies surveyed through this standardised approach. Comparable to the GS1 Standards on the EUDR, it should be taken into account that the GS1 EUDR questionnaire also serves as a baseline, and that additional data and information need to be gathered depending on context and risk (e.g. by refining the questionnaire and adding questions specific to the Brazilian context).
- **Require the sharing of geolocation data:** As operators already provide geolocation data within the DDS, they should use the option of making geolocation data accessible and visible for downstream actors to increase the credibility of their own due diligence systems and to enable downstream actors to exercise their responsibility along the value chain. Downstream operators, on their part, should actively engage and ask for geolocation data to be shared with them (e.g. in contractual documents) in order to gain transparency on sourcing regions, maintain the option for their own analysis of deforestation risks (e.g. regularly or in specific contexts) and to strengthen sustainability in supply chains.

### 3.1.2 Data Analysis for Deforestation

To check if farms and products are deforestation-free (cut-off date of 31 December 2020 according to Art. 2 (13) of the EUDR), spatial imagery tools can help actors to fulfil their due diligence obligations and to ascertain commodities are produced without causing deforestation. Because the EUDR does not require the use of specific satellite images or thresholds for the resolution of satellite images (see EUDR [FAQ v4 5.18. and 9.10.](#)) and only focuses on the outcome of assuring the absence of deforestation, different tools and forest cover maps are evolving on the market (see the [tool overview by Preferred by Nature](#)). Spatial imagery tools also help determine compliance and assess risks by providing maps of soy plantations within the farm and estimating yields. This provides relevant information for assessing the risk of soy laundering and the level of non-compliance in the region surrounding the farm sourced.

The EU Commission itself produced a map on global forest cover which aims to portray the state of global forests at a spatial resolution of 10 metres by the EUDR cut-off date. This tool can support the implementation of the EUDR and is hosted on the platform of the EU observatory on deforestation and forest degradation ([GFC 2020](#)). Created for the purpose of informing the risk assessments of operators, traders, and competent authorities, the map is non-mandatory, non-exclusive, and not legally binding (see [EUDR FAQ v4 9.10.1](#)). An accuracy assessment of the map showed an overall accuracy of 91%; however 18% of the areas were wrongly shown as forests when they are not, while 8% of actual forest areas were missing. Clusters of errors also appeared in places such as Eastern Brazil, where forests are dry and more open ([Colditz et al. 2025](#)).

Actors are **uncertain about which base map to use** to analyse deforestation and **how to handle differences between maps and analysis methodologies** as these can result in different outcomes in risk analyses along the supply chain and between actors.

Additionally, exchanges across the value chain showed hurdles regarding the **different levels of knowledge about how to handle and analyse geolocation data throughout the supply chain stages**. Considering and handling resulting differences in methodologies and analysis approaches is perceived as an additional effort.



#### SUMMARY OF PERCEIVED HURDLES:

- **Uncertainties about which forest map to use as a base for analysis and how to handle differences between maps and analysis methodologies used.**
- **Different levels of knowledge about how to analyse geolocation data**



#### Solutions gathered for perceived hurdles:

##### Uncertainties about which forest map to use as a base for analysis

- **Include high-quality data sources from production countries:**

From the regulatory side, there is no guidance on which forest map to use to ascertain the absence of deforestation. It is the responsibility of the value chain actors to ensure deforestation-free production and to implement systems that guarantee this. When it comes to satellite analysis, multiple options exist on the market. Reported practices, for example, use the GFC as one source and add further data and analysis steps to improve data quality. In Brazil, the Brazilian National Institute for Space Research (INPE) is responsible for monitoring deforestation

through the PRODES programme, which can serve as one important source of input. The PRODES database is available on the [TerraBrasilis platform](#) and covers different biomes within Brazil. The PRODES system shows a high level of accuracy in detecting the loss of native vegetation in Brazil and maps a minimum area of one hectare. As soybean cultivation usually

takes place in areas much larger than one hectare, the PRODES data can serve as a valuable analysis base to ascertain the absence of deforestation. Additionally, programs such as DETER-B can inform actors of deforestation alerts in the Legal Amazon and Cerrado to support monitoring. The detected results, ordered by class, state, municipality, and federal conservation units, are [available at the TerraBrasilis portal](#).

In October 2025, the INPE published a refined map to distinguish between deforestation that occurred before and after the cut-off date of 31 December 2020. This effort aims to provide a baseline that is compatible with the requirements of the EUDR. The mapping meets the 0.5 ha minimum area criterion of the forest definition used in the regulation, and the data is [publicly available](#).



“  
**Nobody understands  
deforestation analysis better  
than Brazil.**  
(Governmental organisation in Brazil)

- **Consider following additional remote sensing systems in Brazil:** MapBiomass, Alerta, Brasil MAIS, SAD Imazon, GLAD, JJ-FAST, and SIPAMSAR (see also [ABRAMPA guidance](#), Appendix 3)
- **Combine and overlap maps:** Supply chain actors and competent authorities should use methodologies to address the differences between base maps and overlap different maps within their risk analysis, taking into account sound, local systems, such as PRODES for Brazil. To address the issue of different map contents, the Forest Data Partnership (FDaP) and AIM4Forests Programme, for example, developed the open-source solution ‘[What is in that plot](#)’ (Whisp), which assists in complying with deforestation-related regulations by analysing several data sets together. It is designed for any actor along the supply chain and third parties as well as for relevant governments and authorities.
- **Prepare processes for handling deviating risk analysis results:** Supply chain actors and tool providers should also prepare for how to handle deviating risk analysis results (e.g. if clients’ risk analyses come to different conclusions or competent authorities come to different results in their reviews). Actors should clearly define processes for the steps which need taking and determine which additional analyses and maps need to be considered in the event of deviation. A conservative approach should be followed to ensure that if multiple systems show no risk but even one system detects a deforestation event, actors should conduct further analyses based on finer spatial resolution and tailored satellite imagery.



#### Different levels of knowledge about how to analyse geolocation data

- **Train value chain partners:** To reduce deviations in analysis results and efforts required for the validation thereof, it is in the interest of the actors that have already gathered experience and learnings in the context of satellite image analysis to train other supply chain actors in the handling and analysis of the respective data. Mutual learning and exchange between different supply chain actors can improve best practice with regard to risk analysis processes and sound methodologies.

## 3.2 PRODUCTION IN ACCORDANCE WITH THE RELEVANT LEGISLATION OF THE COUNTRY OF PRODUCTION

One EUDR requirement defines that products and commodities must be produced in accordance with the relevant legislation of the country of production (according to Art. 3 lit. c EUDR). To answer the question of which legislation is relevant, the regulation lists several areas of law without specifying particular laws per country. These areas cover: land use rights, environmental protection, forest-related rules, third party rights, labour rights, human rights protected under international law, and the principle of free, prior, and informed consent (FPIC) as well as tax, anti-corruption, trade, and customs regulations (EUDR Art. 2 (40)). The [EUDR Guidance Document](#) (Chapter 6) provides some examples and further explanations to help specify the relevant legislation.

Nevertheless, the question of which concrete legislation is relevant for specific countries such as Brazil leaves room for interpretation. Actors in Brazil, but also in the EU, therefore face **uncertainty about which legislation is relevant** under the requirement of the EUDR and which evidence and measures (e.g. concentrating on general indicators, random tests to verify due diligence regarding human rights, ...) **are sufficient** to ascertain that the EUDR legality requirement is met.



**In Brazil, legality is anything but black and white.**

(Civil society organisation)

In a Brazilian context, actors report that the many questions around the topic of legality cannot be easily answered in terms of ‘black and white’. While legal instruments exist in many areas relevant to the EUDR, **weak legal provisions and poor enforcement of**

**laws** remain major challenges, and administrative measures often fall short of ensuring effective implementation. Central issues in Brazil include land rights and related conflicts (*see the following Chapters 3.2.1 and 3.2.2*). Land grabbing, the violent encroachment into traditionally occupied territories, displacement of families, and destruction of livelihoods are still ongoing in connection with soy expansion. Some actions are illegal but remain without legal consequences due to a lack of enforcement of laws, while other actions exploit loopholes or deficiencies in existing legal systems to override human, land, and labour rights, particularly affecting IPLC. Even though IPLC are identified as highly relevant to protecting ecosystems and to supporting crucial ecosystem services, the EUDR is criticised for lacking concrete requirements and measures for the private