

## **Donau Soja – Position Statement on the EU Regulation on Deforestation-free Supply Chains**

This paper outlines Donau Soja's position on the EU regulation on deforestation-free supply chains (EU Deforestation Regulation; EUDR).

Donau Soja welcomes the EU's regulation to stop new deforestation for EU supply chains after years of failure by voluntary market solutions and private-public sector initiatives.

Donau Soja supports the exclusion of both illegal and legal deforestation, requiring traceability and geolocation data to the plot as well as the recognition of voluntary certification systems as a tool for companies to fulfil parts of their due diligence obligations and to provide evidence in the risk mitigation process. We are in the midst of an unprecedented climate and biodiversity crisis where clear and strict legislation is needed that meets the urgency.

However, there are aspects where the regulation does not adequately account for these facts.

### 1) Scope: only deforestation

The regulation is limited to deforestation, thereby not providing any solutions for halting conversion in other valuable ecosystems. Also, people living in these areas continue to fear that their homelands will be converted into agricultural land for the EU. Donau Soja advocates for including conversion of other valuable ecosystems in the scope, in order to efficiently reduce negative effects provoked by EU consumption and production.

### 2) Late cut-off date

The 2020 cut-off date means that all deforestation and associated GHG emissions before 2020 will remain within EU supply chains. Only new deforestation is to be avoided. Furthermore, the late cut-off date could undermine the work of more ambitious initiatives, such as the Amazon Soy Moratorium. Donau Soja recommends providing incentives for companies to go for sustainability certification with an earlier cut-off date than 2020.

### 3) Absence of other sustainability issues

The proposal does not address any sustainability issues beyond legal compliance (e.g. pesticides, fertilisers), thereby failing to incentivise operators towards more ambitious sustainability objectives. Donau Soja recommends aligning with other policy initiatives on related sustainability issues.

## Conclusion

The current requirements only aim to prevent new deforestation, while raw materials for the EU may continue to be grown on areas cleared by 2020. Land conversion and aspects such as pesticides are not in scope. To effectively protect nature and people, Donau Soja is advocating for the legislation to be extended and strengthened to leave no loopholes. Furthermore, in addition to strict import requirements, the EUDR must be embedded in a European protein strategy that promotes the cultivation of protein crops in Europe and regulates consumption. Please find more details and the role of Donau Soja in complying with the regulation in our fact sheet: [Downloads – Donau Soja](#).

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### About Donau Soja

Donau Soja is a non-profit, independent association who supports its partners and members in progressing change to address social, environmental, and economic challenges in soya, legumes and protein production and consumption. This will increase efficiency, fairness and sustainability in European food and feed protein value chains.

**Website:** [www.donausoja.org](http://www.donausoja.org)