



## Annex 1: Table of changes

The Table of Changes following on the next pages, gives an exhaustive overview of the changes to the Donau Soja / Europe Soya Standard for 2026. The following colour code was used to give a better overview what is new:

**Yellow** Approved by the board and presidium on 18. December 2025

OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
<b>R01a Agricultural Producer (Farmer) General Requirements for Donau Soja / Europe Soya Producers</b>			
<b>R01a</b> Version 10 (DS & ES), Point 3.2 The farmer shall hand over a list of all plots of land on which the soya beans were produced including the geographical location of these plots <sup>1</sup> , described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least 6 decimal digits. For plots of land of more than 4 hectares, the geolocation shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land. <sup>1</sup> Upon application, it is possible to recognize equivalent systems to document freedom from deforestation.	<b>R01a</b> Version 11 (DS & ES), Point 3.2 The agricultural producer must maintain a list of the geographical location of all soya cultivation plots and provide it to Donau Soja upon request. The geographical location of these plots shall be described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least 6 decimal digits. For plots of land of more than 4 hectares, the geolocation shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land.	January 2026	EUDR adaptation
<b>R01a</b> Version 10 (DS & ES), Point 3.3 [previous text re-numbered as 3.5]	<b>R01a</b> Version 11 (DS & ES), Point 3.3 For farmers in non-EU countries: The farmer shall hand over a list of all plots of land on which the soybeans were produced including the geographical location of these plots. <sup>4</sup>	January 2026	EUDR adaptation
<b>R01a</b> Version 10 (DS & ES), Point 3.4 [previous text re-numbered as 3.6]	<b>R01a</b> Version 11 (DS & ES), Point 3.4 Before delivering to the primary collector, the farmer is responsible for ensuring that the deforestation-free status of all soy cultivation areas has been checked and confirmed using an appropriate system <sup>1,2</sup>	January 2026	EUDR adaptation
<b>R01a</b> Version 10 (DS & ES), footnote of point 3.2 <sup>1</sup> For micro and small farms within the EU, also the availability of field data on site will be accepted until 29.06.2026. As an alternative to the field data, the reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115 shall also be accepted as evidence.	<b>R01a</b> Version 11 (DS & ES), footnote of point 3.2 [deleted]	January 2026	EUDR adaptation
<b>R01a</b> Version 10 (DS & ES), footnotes of points 3.3 and 3.4 -	<b>R01a</b> Version 11 (DS & ES), footnotes of points 3.3 and 3.4 <sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115). <sup>2</sup> Systems other than the Crop Insights system ( <a href="https://www.crop-insights.com">https://www.crop-insights.com</a> ) may be used upon application.	January 2026	EUDR adaptation
<b>R02 Agricultural Collector and Primary Collector</b>			



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
<b>R02 Version 11 (DS) / 08 (ES), footnote of Point 2.4</b> <sup>1</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026. As an alternative to the field data, the reference number of the due diligence declaration belonging to the product in accordance with Regulation (EU) 2023/1115 will also be accepted as proof.	<b>R02 Version 12 (DS) / 09 (ES), footnote of Point 2.4</b> <sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.	January 2026	EUDR adaptation
<b>R02 Version 11 (DS) / 08 (ES), footnote of Points 3.2 and 4.2.</b> <sup>2</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026.	<b>R02 Version 12 (DS) / 09 (ES), footnote of Points 3.2 and 4.2.</b> <sup>2</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.		EUDR adaptation
<b>R02 Version 11 (DS) / 08 (ES), Point 3.2</b> The primary collector shall send harvest declarations to both their contracted certification body and Donau Soja Organisation (quality@donausoja.org) on the following occasions:	<b>R02 Version 12 (DS) / 09 (ES), Point 3.2</b> The primary collector shall send harvest declarations unprompted to both their contracted certification body and Donau Soja Organisation (quality@donausoja.org) on the following occasions:	January 2026	Technical Change - Improve clarity
<b>R02 Version 11 (DS) / 08 (ES), Points 3.2, 4.1, 4.2</b> • where applicable, reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115.	<b>R02 Version 12 (DS) / 09 (ES), Points 3.2, 4.1, 4.2</b> [deleted]	January 2026	EUDR adaptation
<b>R02 Version 11 (DS) / 08 (ES), Point 6.1</b> In the following cases, the agricultural collector/primary collector shall send to their certification body quantity amendment notifications regarding the stock of Donau Soja / Europe Soya soybeans, specifying the reason for the notification:	<b>R02 Version 12 (DS) / 09 (ES), Point 6.1</b> In the following cases, the agricultural collector/primary collector shall send to their certification body and Donau Soja Organisation (quality@donausoja.org) quantity amendment notifications regarding the stock of Donau Soja / Europe Soya soybeans, specifying the reason for the notification:	January 2026	Technical Change - Improve clarity
<b>R02 Version 11 (DS) / 08 (ES), Point 12</b> -	<b>R02 Version 12 (DS) / 09 (ES), Point 12</b> <b>12 Miscellaneous</b> 12.1 Upon written application to Donau Soja: raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative scheme that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements may also be accepted and stored as Donau Soja / Europe Soya. The soybeans must be sourced from the Donau Soja / Europe Soya region as per point 1.1 of R01b. Additional requirements as per Annex 08 apply.	January 2026	Technical Change - Improve user friendliness
<b>R03 Soya Trader</b>			
<b>R03 Version 10 (DS) / 08 (ES), Points 2.2, 2.3, 2.4</b> • where applicable, reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115.	<b>R03 Version 11 (DS) / 09 (ES), Point 2.2, 2.3, 2.4</b> [deleted]	January 2026	EUDR adaptation
<b>R03 Version 10 (DS) / 08 (ES), Point 2.4</b>	<b>R03 Version 11 (DS) / 09 (ES), Point 2.4</b>		



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
<p>Additionally, data on the geolocation<sup>1</sup> of the plots of land on which the soya beans were produced can be provided on request.</p> <p><sup>1</sup>For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026.</p>	<p>Additionally, <b>if available</b>, data on the geolocation<sup>1</sup> of the plots of land on which the soya beans were produced can be provided on request.</p> <p><sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.</p>	January 2026	EUDR adaptation
<b>R03</b> Version 10 (DS) / 08 (ES), footnote of point 2.5	<b>R03</b> Version 11 (DS) / 09 (ES), footnote of point 2.5		
<p><sup>2</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026. As an alternative to field data, the reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115 shall also be accepted as evidence.</p>	<p><sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.</p>	January 2026	EUDR adaptation
<b>R03</b> Version 10 (DS) / 08 (ES), Point 8	<b>R03</b> Version 11 (DS) / 09 (ES), Point 8		
-	<p><b>8 Miscellaneous</b></p> <p><b>8.1 Upon written application to Donau Soja:</b> Under certain circumstances, raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative system that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements may also be accepted and traded as Donau Soja / Europe Soya. The soybeans must be sourced from the Donau Soja / Europe Soya region as per point 1.1 of R01b. Additional requirements as per Annex 08 apply.</p>	January 2026	Technical Change - Improve user friendliness
<b>R04 Soya Bean Primary Processor</b>			
<b>R04</b> Version 14 (DS) / 09 (ES), Definition	<b>R04</b> Version 15 (DS) / 10 (ES), Definition		
<p>Primary Processor: company processing and/or treating soybeans chemically or physically most substantially, such as:</p> <ul style="list-style-type: none"> <li>- oil mill;</li> <li>- toaster;</li> <li>- soybean primary processors acting as food producers;</li> <li>- producer of food ingredients and food additives</li> </ul>	<p>Primary Processor: <b>first</b> company <b>substantially</b> processing and/or treating <b>raw</b> soybeans chemically or physically <b>most substantially</b>, such as:</p> <ul style="list-style-type: none"> <li>- oil mill;</li> <li>- toaster;</li> <li>- soybean primary processors acting as food producers (e.g. tofu);</li> <li>- producer of food ingredients and food additives (e.g. lecithins, soy protein concentrate) produced directly or as secondary products derived downstream from raw soybean processing within the same company<sup>1</sup>.</li> </ul> <p><sup>1</sup> For secondary products not directly derived from raw soybeans, no additional license fee is payable. However, the list of customers should be notified to Donau Soja Organisation (see 2.6.).</p>	January 2026	Technical Change - Improve clarity
<b>R04</b> Version 14 (DS) / 09 (ES), Point 2.1	<b>R04</b> Version 15 (DS) / 10 (ES), Point 2.1		



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
[re-numbered due to new point added]	2.1 All incoming soybeans shall be purchased from Donau Soja /Europe Soya certified companies, be Donau Soja / Europe Soya certified and be accompanied by a valid lot certificate.	January 2026	Technical Change - Improve clarity
<b>R04</b> Version 14 (DS) / 09 (ES), 2.5	<b>R04</b> Version 15 (DS) / 10 (ES), 2.6		
By the 10th of each calendar month, the primary processor shall send the following information to Donau Soja Organisation [...]	By the 10th of each calendar month, the primary processor shall send the following information unprompted to Donau Soja Organisation [...]	January 2026	Technical Change - Improve clarity
<b>R04</b> Version 14 (DS) / 09 (ES), Point 3.2	<b>R04</b> Version 15 (DS) / 10 (ES), Point 3.2		
<ul style="list-style-type: none"> <li>where applicable, reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115.</li> </ul>	[deleted]	January 2026	EUDR adaptation
<b>R04</b> Version 14 (DS) / 09 (ES), Point 3.2	<b>R04</b> Version 15 (DS) / 10 (ES), Point 3.2		
<p>Additionally, data on the geolocation<sup>2</sup> of the plots of land on which the soybeans were produced can be provided on request.</p> <p><sup>2</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026</p>	<p>Additionally, if available, data on the geolocation<sup>2</sup> of the plots of land on which the soybeans were produced can be provided on request.</p> <p><sup>2</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.</p>	January 2026	EUDR adaptation
<b>R04</b> Version 14 (DS) / 09 (ES), Point 7.2	<b>R04</b> Version 15 (DS) / 10 (ES), Point 7.2		
-	The primary processor must hold a valid membership with of the Donau Soja Association.	January 2026	Technical Change - Improve clarity
<b>R04</b> Version 14 (DS), Point 12	<b>R04</b> Version 15 (DS), Point 12		
-	<p><b>12 Miscellaneous</b></p> <p>12.1 Special case: In the event of critical supply shortages of certified Donau Soja soybeans, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya soybeans instead. A written request stating the grounds for the application must be sent to Donau Soja (quality@donausoja.org), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The primary processor is obligated to report the quantity of Europe Soya (ES) materials used to produce Donau Soja (DS) soya products to the Donau Soja Organisation (quality@donausoja.org) and their DS certification body on a yearly basis, as well as the total amount of DS soya used in this timeframe.</p>	January 2026	Technical Change - Improve clarity
<b>R04</b> Version 14 (DS) / 09 (ES), Point 12	<b>R04</b> Version 15 (DS) / 10 (ES), Point 12		



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
-	Upon written application to Donau Soja: raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative system that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements may also be accepted and processed as Donau Soja / Europe Soya. The soybeans must be sourced from the Donau Soja / Europe Soya region as per point 1.1 of R01b. Additional requirements as per Annex 08 apply	January 2026	Technical Change - Improve user friendliness
<b>R05 Compound Feed Producer</b>			
<b>R05 Version 08 (DS) / 06 (ES), Purpose</b>	<b>R05 Version 09 (DS) / 07 (ES), Purpose</b>		
Specify the Donau Soja / Europe Soya requirements to be met by compound feed producers.	Specify the Donau Soja / Europe Soya requirements to be met by producers of compound feed and other materials intended as feed (lecithin, soy protein concentrate etc.)	January 2026	Technical Change - Improve clarity
<b>R05 Version 08 (DS) / 06 (ES), Definition</b>	<b>R05 Version 09 (DS) / 07 (ES), Definition</b>		
<u>Compound feed producer</u> : company producing ready-made feed material or complementary feed material by mixing single feed materials.	<u>Compound feed producer</u> : company producing ready-made feed material or complementary feed material by mixing single feed materials. The manufacture of other feed materials (e.g. lecithin or soy protein concentrate) that is not produced from raw soybeans in the same company and is intended for animal feed is also covered by this document.	January 2026	Technical Change - Improve clarity
<b>R05 Version 08 (DS) / 06 (ES), Point 2.1</b>	<b>R05 Version 09 (DS) / 07 (ES), Point 2.1</b>		
[re-numbered due to new point added]	All incoming soybean products intended for production of Donau Soja / Europe Soya feed shall be purchased from Donau Soja / Europe Soya certified companies and be Donau Soja / Europe Soya certified. A certificate of traceability (COT) to accompany the goods is voluntary.	January 2026	Technical Change - Improve clarity
<b>R05 Version 08 (DS) / 06 (ES), Point 10.2</b>	<b>R05 Version 09 (DS) / 07 (ES), Point 10.2</b>		
-	The compound feed producer must hold a valid membership with of the Donau Soja Association.	January 2026	Technical Change - Improve clarity
<b>R05 Version 08 (DS), Point 13</b>	<b>R05 Version 09 (DS), Point 13</b>		
-	<b>13 Miscellaneous</b> <b>13.1 Special case:</b> in the event of critical supply shortages of certified Donau Soja materials, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya materials instead. A written request stating the grounds for the application must be sent to Donau Soja (quality@donausoja.org), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The compound feed producer is obligated to report the quantity of Europe Soya (ES)	January 2026	Technical Change - Improve clarity



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
	materials used to produce Donau Soja (DS) feed materials to the Donau Soja Organisation (quality@donausoja.org) and their DS certification body on a yearly basis, as well as the total amount of DS soya used in this timeframe.		
<b>R06a Agricultural Processor</b>			
<b>R06a</b> Version 04 (DS & ES), Point 2.1 [re-numbered due to new point added]	<b>R06a</b> Version 05 (DS & ES), Point 2.1 All incoming feed intended for Donau Soja / Europe Soya production shall be purchased from Donau Soja / Europe Soya certified companies and be Donau Soja / Europe Soya certified.	January 2026	Technical Change - Improve clarity
<b>R06a</b> Version 04 (DS & ES), Point 5 [re-numbered due to new point added]	<b>R06a</b> Version 05 (DS & ES), Point 5 <b>5 Donau Soja / Europe Soya License Contract</b> 5.1 Before marketing products with the Donau Soja / Europe Soya logo to consumers, the company must become a member of the Donau Soja Association and conclude a Donau Soja / Europe Soya license contract (for logo usage) with Donau Soja Organisation on the labelling requirements to be met. This includes the requirement to submit labels for review and approval to Donau Soja.	January 2026	Technical Change - Improve clarity
<b>R06a</b> Version 04 (DS), Point 9 -	<b>R06a</b> Version 05 (DS), Point 9 <b>9 Miscellaneous</b> 9.1 <u>Special case:</u> in the event of critical supply shortages of certified Donau Soja feed, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya feed instead. A written request stating the grounds for the application must be sent to Donau Soja (quality@donausoja.org), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The agricultural processor is obligated to report the quantity of Europe Soya (ES) feed materials used to produce Donau Soja (DS) soya products to the Donau Soja Organisation (quality@donausoja.org) and their DS certification body on a yearly basis, as well as the total amount of DS feed materials used in this timeframe.	January 2026	Technical Change - Improve clarity
<b>R06b Food Processor through Marketer</b>			
<b>R06b</b> Version 03 (DS) / 04 (ES), Definition Company processing products from animal products or processing soya components for food use (soya bean primary processors acting as food producers—see Requirements R 04) This shall include, in particular, the following companies:	<b>R06b</b> Version 05 (DS) / 05 (ES), Definition <b>Food Processor:</b> Company processing products from animals fed with Donau Soja / Europe Soya or processing soya components and processed soya for food use (soybean primary processors acting as food producers—see Requirements R 05)	January 2026	Technical Change - Improve clarity

Kommentiert [AV1]: Sollen wir das wirklich einfordern? Macht glaube ich niemand.

Kommentiert [DG2R1]: Ich würde es jährlich machen - monatlich ist zu viel!

Kommentiert [AV3]: Fände ich interessant um zu schauen, ob sie regelmäßig einen großen Anteil an DS durch ES ersetzen müssen.



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
<ul style="list-style-type: none"> <li>- producers of processed food products/ producers of semi-finished products (e.g. egg breaking plants, fresh egg processors, slaughterhouses)—, products are not intended for the final consumer here;</li> <li>- food producers, food marketers (e.g. egg packing stations, dairies, cutting plants, butcher's shops and soya bean oil refineries or soya product producers, respectively, but also convenience food producers)— products are intended for the final consumer here;</li> <li>- distributors of labelled products (logo users).</li> </ul> <p><b>GM:</b> genetically modified <b>Non-GM:</b> non-genetically modified</p>	<p>This shall include, in particular, the following companies:</p> <ul style="list-style-type: none"> <li>- producers of processed food products/semi-finished products (e.g. egg breaking plants, fresh egg processors, slaughterhouses)—, also e.g. production of lecithins and soy protein concentrate for food use)- this means products that are not intended for the final consumer;</li> <li>- food producers, food marketers (e.g. egg packing stations, dairies, cutting plants, butcher's shops and soybean oil refineries or soya product producers, respectively, but also convenience food producers)— this means products that are intended for the final consumer;</li> <li>- distributors of labelled products (logo users).</li> </ul> <p><b>GM:</b> genetically modified <b>Non-GM:</b> non-genetically modified = GM-free</p>		
<b>R06b</b> Version 03 (DS) / 04 (ES), Point 1.1	<b>R06b</b> Version 05 (DS) / 05 (ES), Point 1.1		
[re-numbered due to new point added]	All incoming soybean materials and components intended for production of Donau Soja / Europe Soya products shall be purchased from Donau Soja / Europe Soya certified companies and be Donau Soja / Europe Soya certified.	January 22026	Technical Change - Improve clarity
<b>R06b</b> Version 03 (DS) / 04 (ES), Point 6.1	<b>R06b</b> Version 05 (DS) / 05 (ES), Point 6.1		
The company shall conclude a Donau Soja / Europe Soja logo usage (License) contract with Donau Soja Organisation on the requirements to be met.	If products are being manufactured from raw soybeans (e.g. tofu), the food processor must get certified under the primary processor (R 05) scope and conclude the Donau Soja / Europe Soya primary processor contract on the requirements to be met by the primary processor with Donau Soja Organisation.	January 2026	Technical Change - Improve clarity
<b>R06b</b> Version 03 (DS) / 04 (ES), Point 6.2	<b>R06b</b> Version 05 (DS) / 05 (ES), Point 6.2		
-	Before marketing products with the Donau Soja / Europe Soja logo to consumers, the company must become a member of the Donau Soja Association and conclude a Donau Soja / Europe Soya license contract (for logo usage) with Donau Soja Organisation on the labelling requirements to be met. This includes the requirement to submit labels for review and approval to Donau Soja.	January 2026	EUDR adaptation
<b>R06b</b> Version 03 (DS) / 04 (ES), Point 9	<b>R06b</b> Version 05 (DS) / 05 (ES), Point 9		
-	<b>9 Miscellaneous</b> 9.1 <b>Special case:</b> In the event of critical supply shortages of Donau Soja materials and components, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya materials and components instead. A written request stating the grounds for the application must be sent to Donau Soja	January 2026	Technical Change - Improve clarity

OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
	(quality@donausoja.org), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The food processor is obligated to report the quantity of Europe Soya (ES) materials used to produce Donau Soja (DS) soya products to the Donau Soja Organisation (quality@donausoja.org) and their DS certification body on a yearly basis, as well as the total amount of DS soya used in this timeframe.		
<b>R08 Certification Body</b>			
<b>R08</b> Version 08 (DS) / 05 (ES), Point 4.1	<b>R08</b> Version 09 (DS) / 06 (ES), Point 4.1		
The certification body shall accept harvest declarations from contracted primary agricultural collectors and document the quantities declared in the Donau Soja internet portal.	The certification body shall accept harvest declarations from contracted primary agricultural collectors, as well as any quantity declarations of soybeans from alternative systems under Annex 08, and document the quantities declared in the Donau Soja internet portal.	January 2026	Technical Change
<b>R08</b> Version 08 (DS) / 05 (ES), Point 4.2	<b>R08</b> Version 09 (DS) / 06 (ES), Point 4.2		
<ul style="list-style-type: none"> <li>where applicable, reference number of the due diligence statement associated to the product according to regulation (EU) 2023/115</li> </ul>	[deleted]	January 2026	EUDR adaptation
<b>R08</b> Version 08 (DS) / 05 (ES), Point 4.2	<b>R08</b> Version 09 (DS) / 06 (ES), Point 4.2		
-	<ul style="list-style-type: none"> <li>on COT only: as applicable "CoC model: Quantity Equivalence System" OR "CoC model: Segregated"</li> </ul> <p>Additionally, if available, data on the geolocation<sup>3</sup> of the plots of land on which the soybeans were produced can be provided on request if available.</p> <p><sup>3</sup>Valid from the date of applicability of the EUDR (Regulation 2023/1115).</p>	January 2026	Technical Change - Improve clarity EUDR adaptation
<b>R08</b> Version 08 (DS) / 05 (ES), Point 11.1	<b>R08</b> Version 09 (DS) / 06 (ES), Point 11.1		
<ul style="list-style-type: none"> <li>activity of the operation according to the definitions in the respective Donau Soja Requirements (agricultural soybean collector, primary collector, soya trader, primary processor, compound feed producer, etc.);</li> </ul>	<ul style="list-style-type: none"> <li>activity of the operation according to the definitions in the respective Donau Soja / Europe Soya Requirements (e.g. R 02 agricultural soybean collector, R 02 primary collector, R 03 soya trader, R04 primary processor, R05 compound feed producer, etc.);</li> <li>Chain of Custody (COC) model: Segregation or Quantity Equivalence System</li> </ul>	January 2026	Technical Change - Improve clarity
<b>Declaration of Self-Commitment – Farmers for the Cultivation of Donau Soja / Europe Soya</b>			
Version 07 (DS & ES), Point 1	Version 08 (DS & ES), Point 1		

**Kommentiert [AV4]:** Sollen wir das wirklich einfordern? Macht glaube ich niemand.

**Kommentiert [DG5R4]:** Ich würde es jährlich machen - monatlich ist zu viel!

**Kommentiert [AV6]:** Fände ich interessant um zu schauen, ob sie regelmäßig einen großen Anteil an DS durch ES ersetzen müssen.



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
<sup>6</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026. As an alternative to field data, the reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115 shall also be accepted as evidence.	<sup>6</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.	January 2026	EUDR adaptation
<b>Requirements for the traceability system</b>			
Version 03 (DS & ES), Definition	Version 04 (DS & ES), Definition		
-	<b>LOT</b> = lot certificate <b>COT</b> = certificate of traceability	-	Technical Change - Improve clarity
Version 03 (DS & ES), Point 1.2, 4.1 and 4.2	Version 04 (DS & ES), Point 1.2, 4.1 and 4.2		
• where applicable, reference number of the product's due diligence statement in accordance with Regulation (EU) 2023/1115.	[deleted]	January 2026	EUDR adaptation
Version 03 (DS & ES), footnote of Point 1.2	Version 04 (DS & ES), footnote of Point 1.2		
<sup>1</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026	<sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.	January 2026	EUDR adaptation
Version 03 (DS & ES), Point 4.2	Version 03 (DS & ES), Point 4.2		
Additionally, data on the geolocation of the plots of land on which the soybeans were produced can be provided on request. <sup>2</sup>  <sup>2</sup> For quantities from the 2025 harvest that originate from micro and small farms within the EU, the availability of field data on site will be accepted until 29.06.2026	Additionally, <b>if available</b> , data on the geolocation of the plots of land on which the soybeans were produced can be provided on request. <sup>2</sup>  <sup>2</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.	January 2026	EUDR adaptation
<b>Annex 05 Quantity Equivalence System using "Approved by Donau Soja / Europe Soya" soybeans</b>			
<b>Annex 05</b> , Version 06 (ES), Purpose	<b>Annex 05</b> , Version 01 (DS) / Version 07 (ES), Purpose		
Define the framework conditions that allow for the joint processing and/or storing of certified Europe Soya soybeans and/or products that comply with the "Approved by Europe Soya" criteria (AB-ES soybeans) (= quantity equivalence system).	Define the framework conditions that allow for the joint processing and/or storing of certified Donau Soja / Europe Soya soybeans and/or products that comply with the "Approved by Donau Soja / Europe Soya" criteria (AB-DS7ES soybeans) (= quantity equivalence system, QES). The quantity equivalence system covers the stages from soybean primary processor to compound feed producer.	January 2026	Technical Change - Improve clarity
<b>Annex 05</b> , Version 06 (ES), Definition	<b>Annex 05</b> , Version 01 (DS) / Version 07 (ES), Definition		
<b>Quantity equivalence:</b> The quantity input of ES equals the quantity output of DS in the specified cumulative period.	<b>Quantity equivalence (QES):</b> The quantity input of DS / ES equals the quantity output of DS / DS in the specified cumulative period.	January 2026	Technical Change - Improve clarity



OLD (Version February 2025)	NEW (Version January 2026)	Valid from	Comments
	<b>Segregation:</b> DS / ES goods are being kept physically separated (segregated) from non-DS/ES-certified goods throughout the supply chain, which means there is no mixing (as opposed to the QES).		
<b>Annex 05, Version 06 (ES), Point 4.1</b>	<b>Annex 05, Version 01 (DS) / Version 07 (ES), Point 4.1</b>		
The cumulative period for calculating the required quantity equivalence shall be 6 months (from January to June as well as from July to December).	The cumulative period for calculating the required quantity equivalence shall be 12 months (from the start of the new harvest season 1 September to 31 August of the following year). At the end of this timespan, the balance of Donau Soja / Europe Soya materials purchased must not fall below the equivalent balance of Donau Soja / Europe Soya products produced and sold. After this 12-month period, any remaining physical DS/ES-certified stock must be notified to the certification body and to Donau Soja (quality@donausoja.org) for carry-over. These carry-over stock amounts must be consumed by 31 December of the same year. After this date, the remaining stock must be downgraded. In contrast, any non-physical balance of goods ("credits") must be reset to zero on 31 August, in line with the cumulative period.	January 2026	Technical Change - Improve user friendliness
<b>Annex 08 Recognition of Soybeans from Alternative Systems</b>			
New Annex			