

30 March 2026

To:

Ursula Von der Leyen, President of the European Commission

Teresa Ribera, Executive Vice-President for a Clean, Just and Competitive Transition

Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy

Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Valdis Dombrovskis, Commissioner for Economy and Productivity; Implementation and Simplification

Maroš Šefčovič, Commissioner for Trade and Economic Security; Interinstitutional Relations and Transparency

Subject: Ensuring the Integrity of the EU Deforestation Regulation (EUDR) by Maintaining Leather within the Scope of Annex I

Dear President, Vice-Presidents and Commissioners,

The undersigned non-governmental organizations strongly urge the Commission not to exclude leather from the scope of the EU Deforestation Regulation (EUDR).ⁱ As the Commission moves toward the implementation phase of this landmark legislation, it is imperative that the product scope remains grounded in scientific data and environmental impact rather than subject to exemptions granted in apparent response to industry lobbying.[1]

Arbitrarily removing leather from the EUDR would lead to significant policy incoherence: the meat from a cow raised on deforested land would be prohibited, while the skin of that same animal could be sold freely in the single market.

Cattle expansion is the primary cause of commodity-driven deforestation

The environmental rationale for including cattle products in the EUDR is incontrovertible. The expansion of cattle pasture accounted for 42% of global deforestation driven by agriculture

ⁱ Leather refers to the leather products included in Annex 1 of the EUDR: raw and prepared cowhides under Harmonized System (HS) codes 4101, 4104, and 4107

between 2001 and 2022, converting an area of forest the size of Spain and releasing half of all carbon emissions caused by commodity-driven deforestation globally.[2]

Most cattle-driven deforestation happens at the expense of the Amazon rainforest, with cattle expansion in Brazil alone accounting for roughly a quarter of all agriculture-driven deforestation globally during the same time period.[3]

Recent investigations by organizations including Earthsight, Environmental Investigation Agency, Global Witness, Human Rights Watch, and Rainforest Foundation Norway have documented the exposure of EU leather supply chains to deforestation, crime and human rights abuses in the Amazon region, including illegal deforestation in Indigenous territories and protected areas.[4]

Local communities often face loss of livelihoods and violence at the hands of illegal ranchers who are able to sell cattle into EU-linked supply chains. “The land grabbers made me lose 17 years of work in a matter of minutes,” the president of a smallholder farmers association in the Brazilian Amazon who survived an assassination attempt for speaking out against illegal deforestation and land invasions told Human Rights Watch last year.[5]

The economic importance of leather to the cattle sector

While beef is the primary economic driver of cattle production, the sale and processing of hides provide significant revenue for the sector. In 2024, leather accounted for one-quarter of the value of all cattle products in the EUDR’s scope imported by the EU, representing one of the most significant global exposures of the EU market to deforestation embodied in trade.[6]

In Brazil, where the majority of cattle-driven deforestation is occurring, the leather industry is a major economic engine with significant political influence, generating over US\$1.1 billion in exports last year.[7] The country exports around 80% of the leather it processes, whereas 80% of beef production is consumed domestically.[8]

The EU’s market leverage is particularly important in Brazil. Leather accounts for one-third of the cattle products in the EUDR scope that the EU imports from Brazil, valued at approximately €240 million in 2024.[9] Last year, the EU was Brazil’s second largest export market, and the destination for around 20% of Brazil’s exports of leather, with nearly 60% of EU imports going to Italy.[10]

Maintaining access to the EU market therefore represents an important incentive for the Brazilian cattle sector to transition towards more sustainable practices. Brazilian policy makers have cited the EUDR as a key motivation for the adoption of new cattle traceability policies that would bring more transparency and accountability to the sector.[11]

Tracing cowhides is feasible and already being done

Leather industry claims that tracing cowhides is not feasible are simply false.

Cattle traceability systems that are already in place^[12] or being developed^[13] by companies and governments will cover the most complex steps in the supply chain – the movement of cattle prior to slaughter. Tracing leather through the final stages of processing is a relatively straightforward administrative process.

The government of Brazil – the largest non-EU supplier of leather to the EU market – is developing a national cattle traceability system for individual animals, and one major cattle-producing state has had such a system for nearly a decade.^[14] Other Brazilian states have also committed to them, complemented by a wealth of private sector traceability initiatives already underway.^[15]

JBS, the world's largest leather producer and major exporter to the EU, already has a system in place in Brazil allowing its customers to trace leather back to the direct supplying ranches.^[16] Durlicouros, another major Brazilian leather producer, has recently stated that their traceability system is ready for EUDR compliance.^[17]

The exclusion of leather from the scope of the EUDR would remove an important incentive for the continued development and improvement of these systems.

Importance of EU leadership

To maximize the EUDR's reach and provide consistency in its application, the law must ensure that all economically significant primary products derived from covered commodities – whether this be palm kernel oil, soymeal, cocoa butter, or cowhides – are included in its scope. Removing leather, seemingly in response to pressure from industry, would set a dangerous precedent, encouraging other sectors to seek similar exemptions and undermining the EUDR's reputation as a fact-based, fair, and data-driven regulation.

We urge the Commission to uphold the integrity of the EUDR and maintain leather in Annex I. Only by including all high-impact cattle products can the EU fulfill its commitment to ending its contribution to global deforestation.

Sincerely,

AidEnvironment

all4trees

*Articulação dos Povos Indígenas do Brasil
(APIB)*

Canopée- Forêts Vivantes

Canopy Planet Society

Client Earth

Climate Rights International

Comité Schone Lucht

Deutsche Umwelthilfe

Earthsight

Environmental Investigation Agency

Fern

*Focus, Association for Sustainable
Development*

Global Witness

Greenpeace European Unit

Human Rights Watch

*Instituto Sociedade, População e Natureza
(ISPN)*

Mighty Earth

*Polish Ecological Club in Krakow Gliwice
Chapter*

Rainforest Action Network

Rainforest Foundation Norway

Repórter Brasil

Südwind

Swedish Society for Nature Conservation

The Sentry

The Wilderness Society Australia

World Forest ID

[1] For examples of industry lobbying, see recent publications by COTANCE, “EU rules to minimise deforestation & forest degradation – amendment of Annex I to the Deforestation Regulation,” May 12, 2025, <https://www.cotance.com/news/latest/1303-eu-rules-to-minimise-deforestation-forest-degradation-amendment-of-annex-i-to-the-deforestation-regulation> (accessed March 18, 2026); La Conceria, “We can now make our voices heard for leather to be excluded from the EUDR”, May 8, 2025, <https://www.laconceria.it/en/sustainability/we-can-now-make-our-voices-heard-for-leather-to-be-excluded-from-the-eudr/> (accessed March 18, 2026)

[2] C. Singh and U.M. Persson, “Global patterns of commodity-driven deforestation and associated carbon emissions,” *Nature Food*, February 23, 2026, <https://www.nature.com/articles/s43016-026-01305-4#Sec16>

[3] The Deforestation Footprint dashboard presents the outputs of the Deforestation Driver & Carbon Emissions (DeDuCE) model – a global dataset linking commodity production to forest loss – and integrated trade models, <https://www.deforestationfootprint.earth/> (accessed March 18, 2026)

[4] In Brazil, see: Earthsight, “The hidden price of luxury: what Europe’s designer handbags are costing the Amazon rainforest,” June 24, 2025, <https://www.earthsight.org.uk/news/hidden-price-luxury> (accessed March 18, 2026); Environmental Investigation Agency, “Deforestation in the Driver’s Seat,” December 17, 2022, <https://eia.org/report/deforestation-drivers-seat/> (accessed March 18, 2026); Global Witness, “Cash Cow: How beef giant JBS’s links to Amazon deforestation and human rights abuses are aided by UK, US and EU financiers, importers and supermarkets,” June 23, 2022, <https://globalwitness.org/en/campaigns/forests/cash-cow/> (accessed March 19, 2026); Human Rights Watch, “Tainted: JBS and the EU’s Exposure to Human Rights Violations and Illegal Deforestation in Pará, Brazil,” October 15, 2025, <https://www.hrw.org/report/2025/10/15/tainted/ibs-and-the-eus-exposure-to-human-rights-violations-and-illegal> (accessed March 18, 2026); Rainforest Foundation Norway, “Hide on the Highway: Tracing Leather from Brazil to Europe under the EU Deforestation Regulation,” May 2024, <https://aidenvironment.org/wp-content/uploads/2024/07/Hide-on-the-Highway-2.pdf>; in Paraguay, see: Earthsight, “Grand Theft Chaco: Luxury cars made with leather from the stolen lands of an uncontacted tribe,” 2020, <https://www.earthsight.org.uk/grandtheftchaco-en> (accessed March 18, 2026); Climate Rights International, “Before It’s Too Late: Curbing Cattle-Driven Deforestation and Rights Abuses in Brazil,” October 2025, <https://cri.org/brazil-cattle-ranching-forced-labor-driving-deforestation-ahead-cop30/> (accessed March 27, 2026).

[5] Human Rights Watch, “Tainted: JBS and the EU’s Exposure to Human Rights Violations and Illegal Deforestation in Pará, Brazil,” October 15, 2025, <https://www.hrw.org/report/2025/10/15/tainted/ibs-and-the-eus-exposure-to-human-rights-violations-and-illegal> (accessed March 19, 2026)

[6] Eurostat (Comext), <https://ec.europa.eu/eurostat/comext/newxtweb/>

[7] Brazil’s Ministry of Development, Industry, Trade and Services, CICB, Brazilian Leather, ApexBrasil, “Brazilian exports of Hides and Skins,” December 2025, https://brazilianleather.cicb.org.br/images/uploads/posts/brazilian-exports-of-hides-ans-skins-dec25-eng_1767905147.pdf (accessed March 18, 2026)

[8] A. Mammadova et al, “Deforestation as a Systemic Risk: The Case of Brazilian Bovine Leather,” February 3, 2022, <https://www.mdpi.com/1999-4907/13/2/233#B118-forests-13-00233> (accessed March 18, 2026)

- [9] Eurostat (Comext), <https://ec.europa.eu/eurostat/comext/newxtweb/>
- [10] Brazil's Ministry of Development, Industry, Trade and Services, CICB, Brazilian Leather, ApexBrasil, "Brazilian exports of Hides and Skins," December 2025, https://brazilianleather.cicb.org.br/images/uploads/posts/brazilian-exports-of-hides-ans-skins-dec25-eng_1767905147.pdf (accessed March 18, 2026)
- [11] See section on "Policy and Judicial Responses" in Human Rights Watch, 2025, *op cit*.
- [12] EU member states, which supply the majority of hides by volume, already have cattle traceability systems in place (see https://food.ec.europa.eu/animals/identification_en). Other major non-EU suppliers also have such systems, including: New Zealand (<https://nzbovinepharma.com/full-traceability>), Australia (<https://www.integritysystems.com.au/identification-traceability/national-livestock-identification-system/>), Uruguay (<https://www.inac.uy/innovaportal/file/27008/1/uruguay-beef--eudr.pdf>); UK (<https://www.gov.uk/government/organisations/british-cattle-movement-service/about>)
- [13] For examples of traceability systems announced by other countries supplying hides to the EU market, see: Argentina (https://alinvest-verde.eu/en_gb/argentina-visec/); India (https://rr-asia.woah.org/app/uploads/2023/11/7-ms-versha-joshi_livestock-traceability-v3.pdf); Paraguay (<https://www.tridge.com/news/siap-will-bring-great-satisfaction-to-paragu-pmvpau#:~:text=Tridge%20summary,AI%20model%20for%20informational%20purposes>)
- [14] D. Boatini Júnior, "Brazil tries to unlock cattle traceability after two decades of delays," November 12, 2025, Globo Rural, <https://valorinternational.globo.com/agribusiness/news/2025/12/11/brazil-tries-to-unlock-cattle-traceability-after-two-decades-of-delays.ghtml> (accessed March 18, 2026); Santa Catarina Agriculture Secretariat, "Santa Catarina revoluciona a agricultura: Sistema de Identificação Individual e Rastreabilidade de Bovinos e Bubalinos completa 16 anos de sucesso," March 31, 2024, <https://www.cidasc.sc.gov.br/blog/2024/03/31/santa-catarina-revoluciona-a-agricultura-sistema-de-identificacao-individual-e-rastreabilidade-de-bovinos-e-bubalinos-completa-16-anos-de-sucesso/> (accessed March 18, 2026)
- [15] Melina Walling, "In this Brazilian state, a new push to track cattle is key to slowing deforestation," AP News, November 16, 2025, <https://apnews.com/article/climate-change-cattle-tracking-deforestation-brazil-cop30-53aaa3a2e1bfc85acdabc3143aa18be3> (accessed March 18, 2026)
- [16] JBS 360 Leather ID, <https://www.ibs360.com.br/en/leather-id/> (accessed March 18, 2026)
- [17] Durlicouros, "Why Choose Durli Leathers as a Supplier of Automotive Leather for Car Seats?", <https://durlicouros.com.br/en/fornecedor-de-couro-automotivo/#:~:text=Innovation%20in%20sustainability:%20Bio%2DLeather,and%20future%20of%20the%20sector> (accessed March 18, 2026)
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