Sustainable Livestock Intergroup

How does the EUDR impact the competitiveness of EU livestock production

Strasbourg, 9 July 2026

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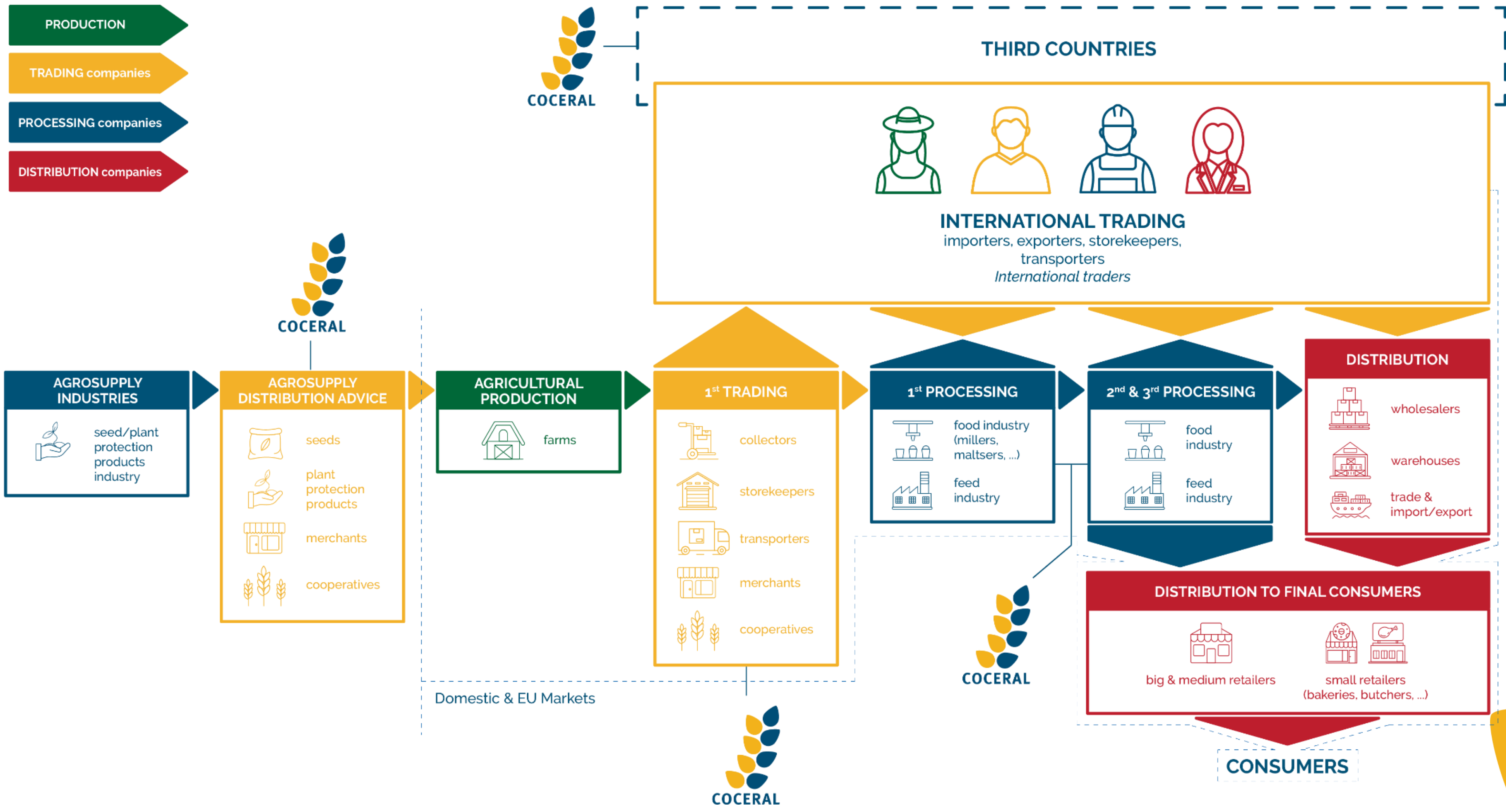
COCERAL is the European association of trade in cereals, oilseeds, pulses, animal feed, olive oil, oils and fats, and agrosupply.

- It represents European collectors, traders, importers and exporters of a wide range of agricultural raw materials and ingredients.
- COCERAL members count some 3000 companies who trade agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses, and operate at every step of the agri supply chain.
  - 20 national trade associations.
  - 18 countries : Austria, Belgium, Bulgaria, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Netherlands, Poland, Portugal, Romania, Spain, Sweden, Switzerland, UK.
  - 15 Corporate members : ADM, Ameropa, Bunge, Cargill, Cefetra, CHS Inc, Copenhagen Merchants, Interfeed, InVivo, LDC, R&H Hall, Schepens & co., Sunrise Foods, Vanden Avenne Commodities, Zitni Terminals.
  - Associate members : AIC (UK), VSGF (Switzerland), UNISTOCK – agri commodities port storage.
  - Extraordinary member : GAFTA.

COCERAL's Position in the Food & Feed chain

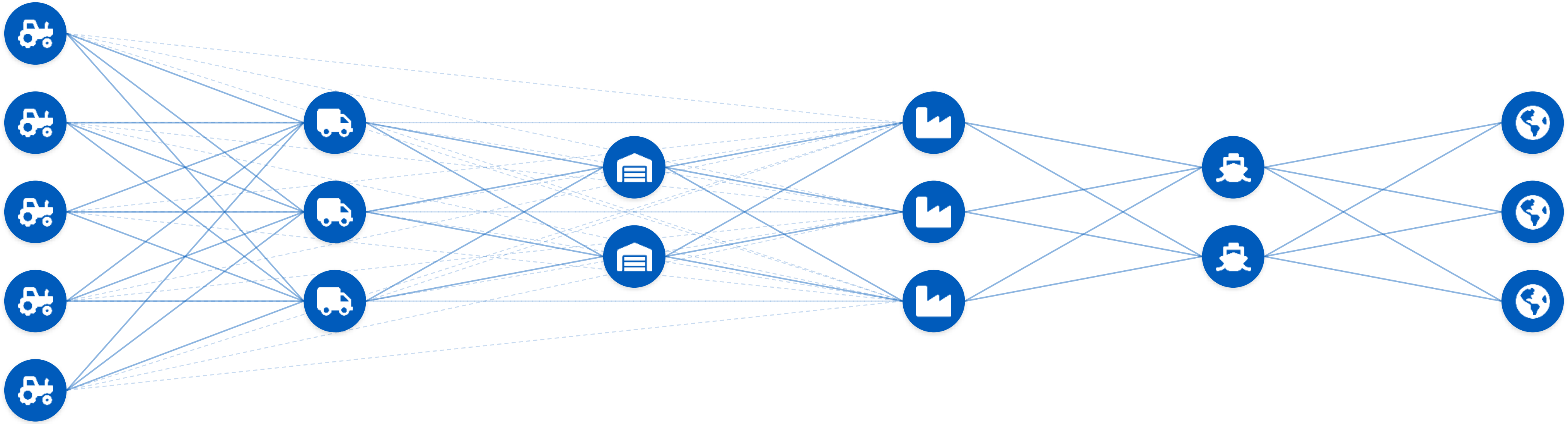
FOOD & FEED CHAIN   COCERAL Representation



Tackling deforestation

- COCERAL members are committed to take action to halt deforestation, and believe that Europe has a unique role to play in that effort.
- Efforts to find solutions that can drastically reduce deforestation, whilst continuing to supply the European market with the raw materials that are required by consumers at affordable prices were already undertaken by traders several years ago.
- Traders are also committed to support policy makers in their efforts to identify the best framework to tackle deforestation at global level.
- However, the current design and implementing provisions of the EUDR are expected to have unintended consequences that could undermine the EU’s competitiveness, disrupt supply chains, and weaken its strategic autonomy.

Complexity of Soy Supply Chains



Farmers	Collection	Regional Storage	Crushing	Port / Export	Destination Markets
10.000 per region	1000 per region	Up to 100 per region	Up to 100 per region		Global buyers (Asia, EU, RoW)

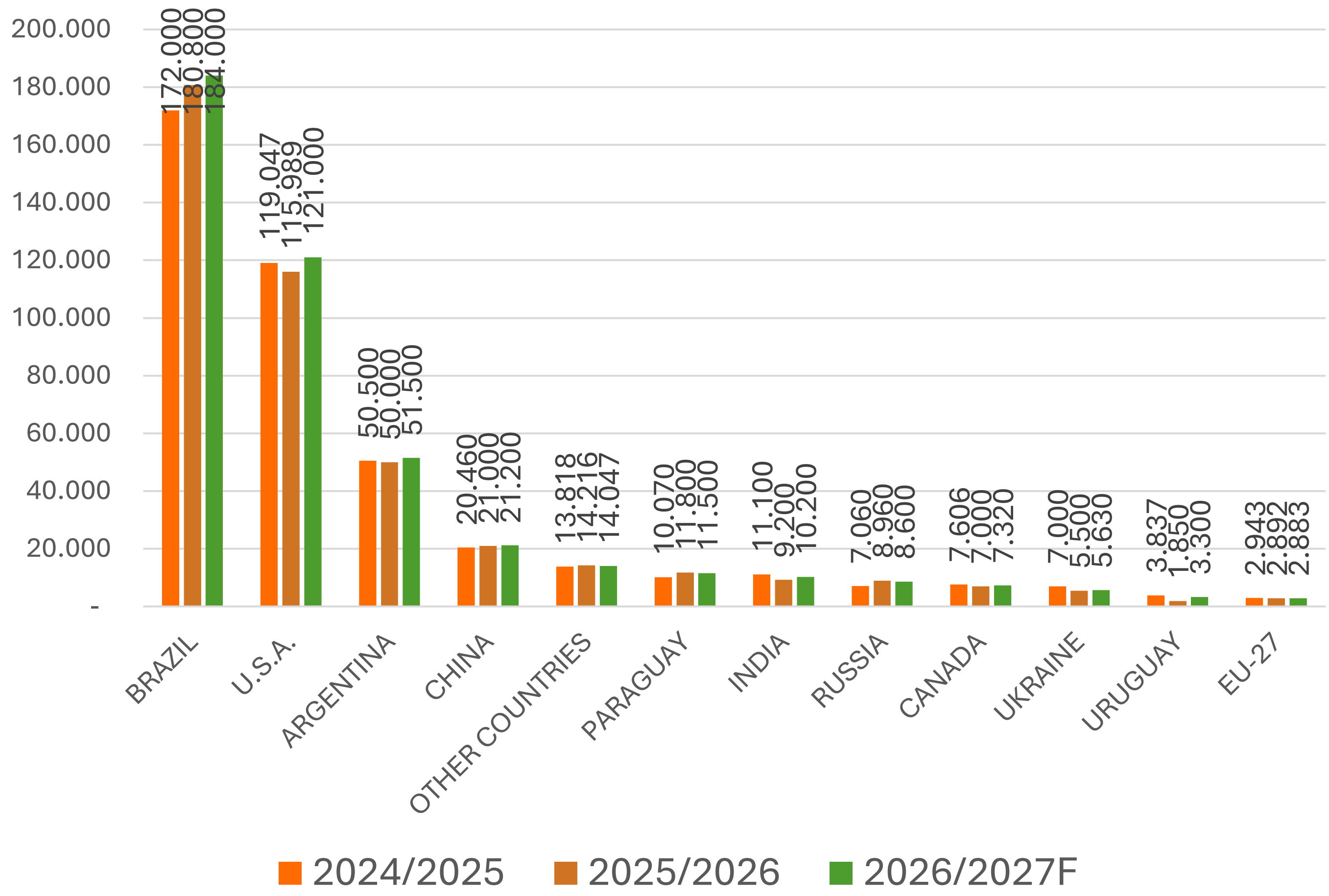
When shipped to destination, soy from different origins and suppliers is merged into one vessel, making physical segregation difficult and expensive.

Supply chains differ depending on geographical location, famers organisational structure and transport costs.

Market Dynamics & Outlook – Soybeans (1)

World Production

(1.000T)	HARVEST	2024/2025	2025/2026	2026/2027F
BRAZIL	Jan-Mar	172.000	180.800	184.000
U.S.A.	Sep-Nov	119.047	115.989	121.000
ARGENTINA	Apr-May	50.500	50.000	51.500
CHINA	Sep-Nov	20.460	21.000	21.200
OTHER COUNTRIES		13.818	14.216	14.047
PARAGUAY	Jan-May	10.070	11.800	11.500
INDIA	Oct-Jan	11.100	9.200	10.200
RUSSIA	Sep-Oct	7.060	8.960	8.600
CANADA	Sep-Nov	7.606	7.000	7.320
UKRAINE	Sep-Oct	7.000	5.500	5.630
URUGUAY	Apr-May	3.837	1.850	3.300
EU-27	Sep-Sep	2.943	2.892	2.883
TOTAL		**425.442**	**429.207**	**441.180**



Fonte: Oil World

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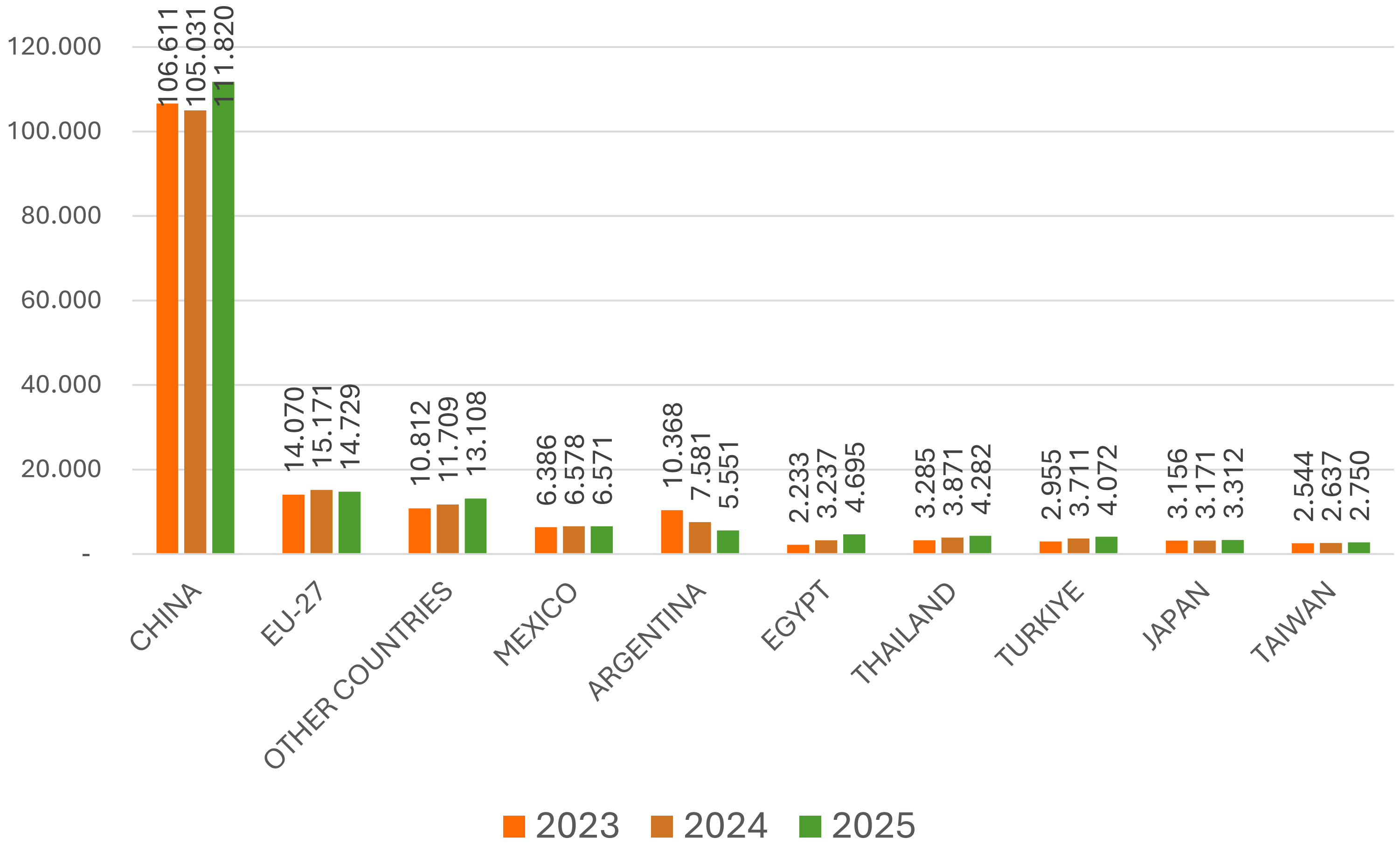
Market Dynamics & Outlook – Soybeans (2)

Imports

JAN-DEC (1.000T)	2023	2024	2025
CHINA	106.611	105.031	111.820
EU-27	14.070	15.171	14.729
OTHER COUNTRIES	10.812	11.709	13.108
MEXICO	6.386	6.578	6.571
ARGENTINA	10.368	7.581	5.551
EGYPT	2.233	3.237	4.695
THAILAND	3.285	3.871	4.282
TURKIYE	2.955	3.711	4.072
JAPAN	3.156	3.171	3.312
TAIWAN	2.544	2.637	2.750
VIETNAM	1.859	2.218	2.609
INDONESIA	2.274	2.676	2.558
PAKISTAN	611	1.039	2.449
IRAN	2.566	2.314	2.291
KOREA, SOUTH	1.298	1.148	1.130
U.K.	909	1.074	994
RUSSIA	1.515	1.419	515
CANADA	439	300	229
TOTAL	173.891	174.887	183.663

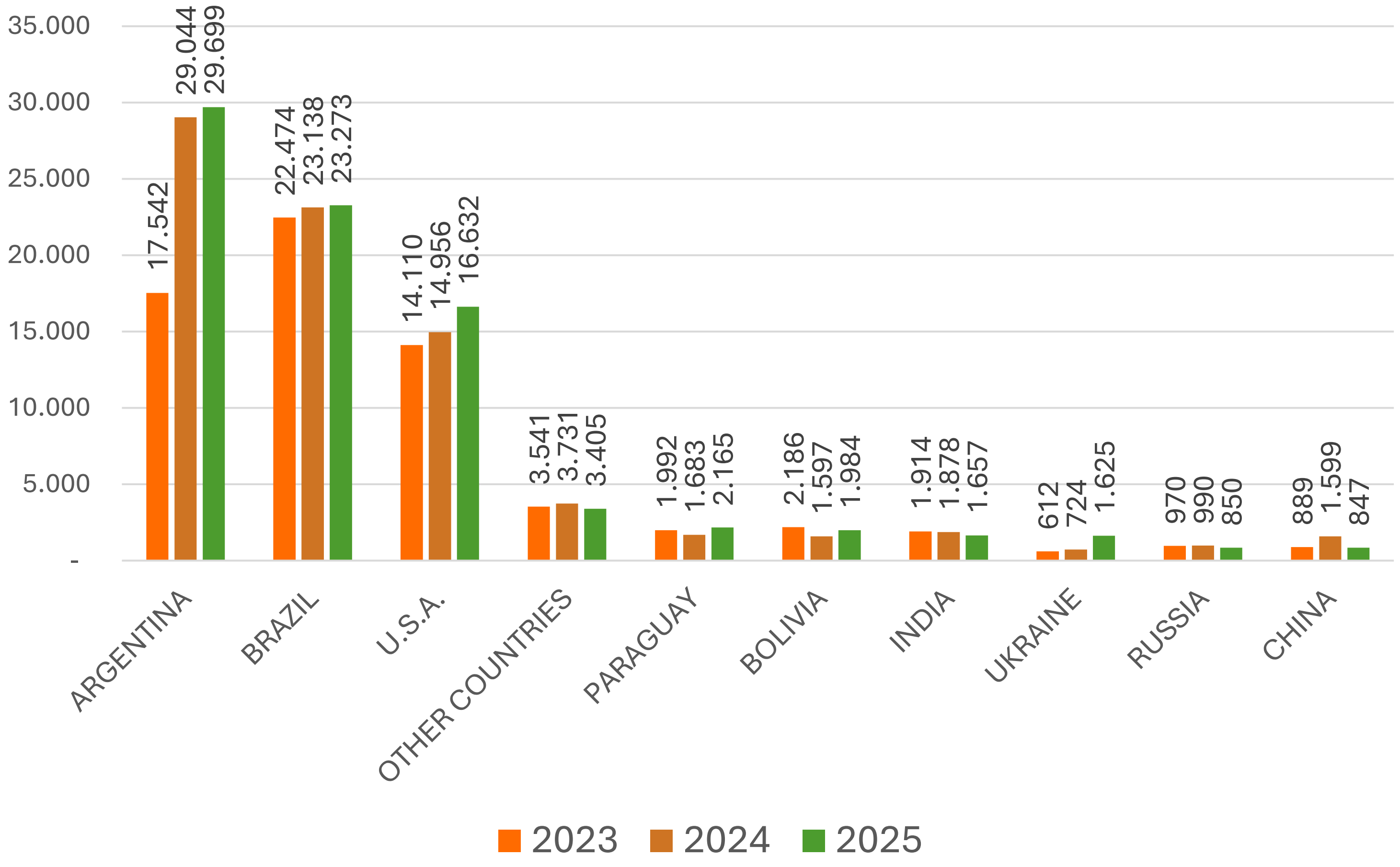


Fonte: Oil World

Market Dynamics & Outlook – Soybean Meal (1)

Exports

JAN-DEC (1.000T)	2023	2024	2025
ARGENTINA	17.542	29.044	29.699
BRAZIL	22.474	23.138	23.273
U.S.A.	14.110	14.956	16.632
OTHER COUNTRIES	3.541	3.731	3.405
PARAGUAY	1.992	1.683	2.165
BOLIVIA	2.186	1.597	1.984
INDIA	1.914	1.878	1.657
UKRAINE	612	724	1.625
RUSSIA	970	990	850
CHINA	889	1.599	847
TOTAL	**66.230**	**79.339**	**82.137**

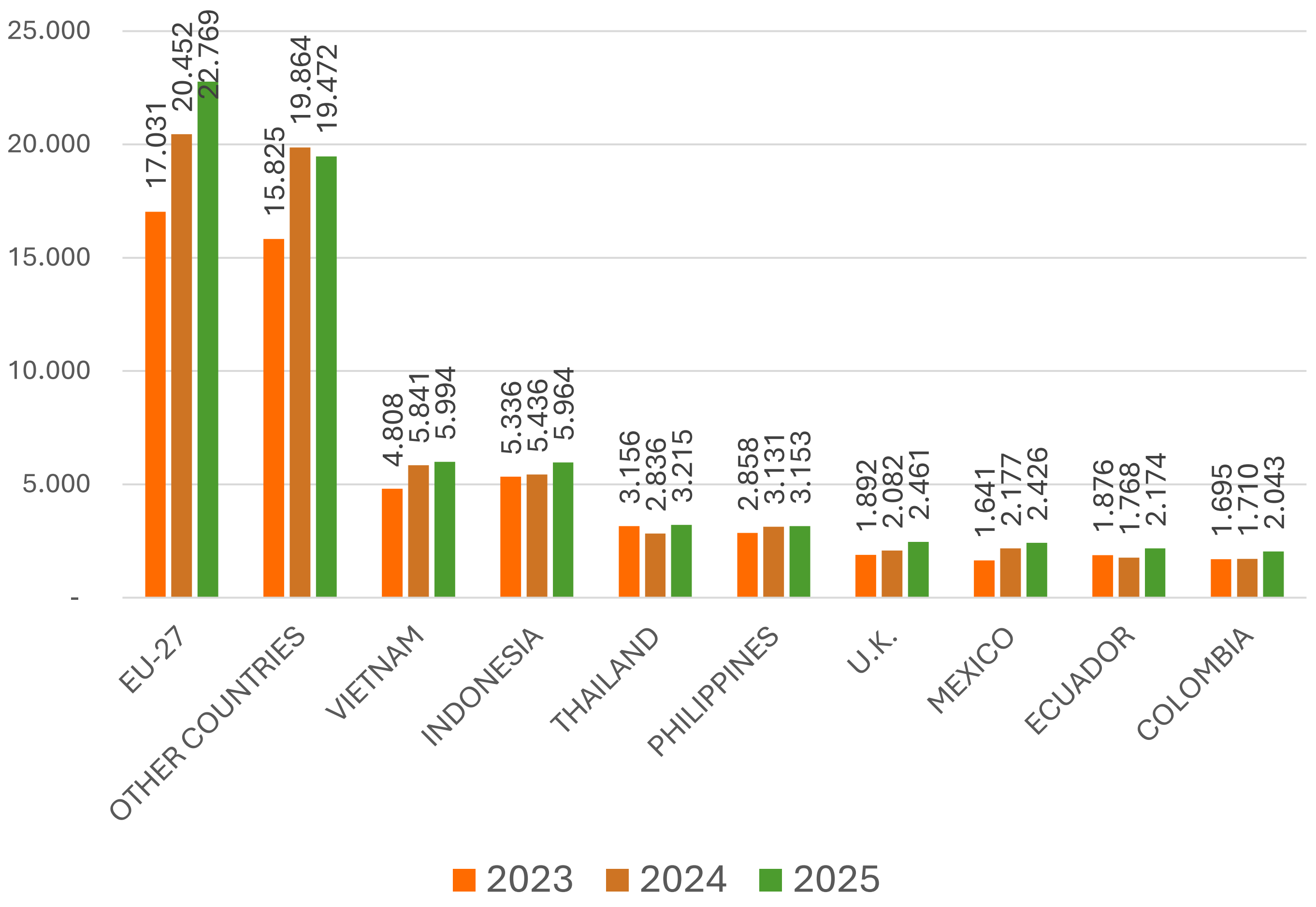


Fonte: Oil World

Market Dynamics & Outlook – Soybean >Meal (2)

Imports

JAN-DEC (1.000T)	2023	2024	2025
EU-27	17.031	20.452	22.769
OTHER COUNTRIES	15.825	19.864	19.472
VIETNAM	4.808	5.841	5.994
INDONESIA	5.336	5.436	5.964
THAILAND	3.156	2.836	3.215
PHILIPPINES	2.858	3.131	3.153
U.K.	1.892	2.082	2.461
MEXICO	1.641	2.177	2.426
ECUADOR	1.876	1.768	2.174
COLOMBIA	1.695	1.710	2.043
PERU	1.510	1.709	1.880
TURKIYE	1.371	1.837	1.838
KOREA, SOUTH	1.410	1.747	1.744
SAUDI ARABIA	990	1.756	1.714
JAPAN	1.660	1.631	1.514
CANADA	1.222	1.471	1.394
MALAYSIA	1.286	1.387	1.368
CHILE	1.013	1.162	1.228
TOTAL	**66.580**	**77.997**	**82.352**



Fonte: Oil World

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Issues with current draft

- Unworkable compliance framework
  - Requirements to verify compliance with all relevant local laws in producing countries remain vague, with no harmonised or authoritative reference framework

  >> This exposes companies to legal and operational risks.

- Disproportionate administrative burden
  - Complex due diligence obligations, combined with data submission challenges and unresolved IT system issues

  >> This creates excessive costs without clear added-value for deforestation prevention.

- Legal and liability uncertainty
  - Gaps in clarity on responsibilities across the supply chain, coupled with overlaps with other EU legislation expose operators to heightened legal risks, potentially including criminal liability.

- Global inconsistency challenges
  - Requirements such as geolocation data sharing conflict with laws in producing countries.

Recommended solutions

- **Recognise credible third-party certification schemes as components of the operators' due diligence processes**
  - A large number of operators and producers have invested in sustainability and traceability mechanisms a great number of years ago. Without this recognition, there is a risk of :
    - >> creating duplication of controls
    - >> undermining the functioning of existing efficient supply chains
    - >> increasing compliance costs.

- **Harmonise proof of legality across the EU Member States and support it with practical guidance to guarantee legal certainty and consistency in enforcement**
  - Coceral members are highly concerned by the potential interpretation and of the EUDR's legality requirements
  - The EUDR requires compliance with the legislation of the country of production, BUT without providing sufficient clarity on what constitutes adequate proof of legality and how this should be assessed across complex, multi-origin supply chains
  - The Commission's intention to develop repositories of relevant laws in producing countries and related information tools that can improve transparency and support operators in understanding legal requirements is very much welcome. However, uncertainties persist :
    - >> operators are exposed to the risk of divergent interpretations and enforcement practices across Member States
    - >> proof of legality munsures legal certainty, consistency in enforcement.

- **Where necessary, provisions contained in the FAQs and Guidance document should be made binding to provide legal certainty through a predictable and uniform application across the EU.**
  - Guidance documents issued by the Commission are important tools for the implementation of the EUDR
  - However, these documents are non-binding and do not constitute a legal basis for enforcement

    >> As a result, operators take legal risks by relying on FAQs and the Guidance document only, in particular when interprétations differ from the Regulation's text.

In a nutshell..

- The simplification package of early May provided limited solutions to address the issues raised.
- Without targeted legislative amendments, a number of operators will be unable to comply, leading to market disruption and reduced effectiveness of the Regulation.
  - This would lead to change of origins and trade flows, resulting in major price increases and problems of availability due to less flexibility.
  - This would be counterproductive in preventing on-going deforestation.

➔ ➔ Existing certification schemes should be recognized, the interpretation of legality requirements should be harmonised across the EU, and provisions in the Commission's FAQs and guidance documents should be made binding where necessary to provide businesses legal certainty.

Thank you for your attention.

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