

Feedback to the public consultation on proposed changes to the EUDR

Global Canopy is a data-driven not-for-profit focusing on commodity deforestation through initiatives including [Forest 500](#) and [Trase](#). We provide open-access data, metrics and insights to leading companies, financial institutions, governments and campaigning organisations worldwide.

We strongly support the objectives of the EU Deforestation Regulation (EUDR) and urge its swift and robust implementation. The latest Trase data shows EU imports continue to be linked to deforestation around the [size of Rome](#) every year.

The EUDR enjoys widespread support among businesses, investors and the public.

- In December 120+ companies, investors and NGOs [signed a joint statement](#) calling on the EU to implement the EUDR as soon as possible.
- In October major agri-food companies, including Nestle, Ferrero and Olam Agri, [wrote to the EU Commission](#) warning against further delays.
- Ahead of COP30, 51 institutional investors managing more than USD 4.5 trillion in assets signed the [Belém Investor Statement on Rainforests](#), calling on governments to eliminate commodity-driven deforestation.
- [Polling shows](#) the overwhelming majority of Europeans support strong deforestation laws. 84% of all respondents want to see implementation of the EUDR, and 73% believe it should be a key priority.

The EUDR states the Union should be “a strong global actor” and a “key enabler of the green transition to fight climate change and reverse biodiversity loss.” Our latest [Forest 500 data](#) shows even though the law has not yet been implemented, it has driven change: among the 500 most influential companies in the deforestation economy, improvements in traceability are reported across eight of the nine EUDR commodities.

Companies have had more than three years to prepare and many are ready for implementation. Businesses want certainty, which is why in July over 60 major companies including Nestlé, IKEA, Barry Callebaut, Unilever, Mars and Ferrero [publicly backed the EUDR](#) and opposed efforts to weaken it. These companies have invested in compliance systems [and warn that changes now](#) would undermine these investments, deepen regulatory uncertainty and cause further delays.

Producer governments have also invested in supporting EUDR compliance including in national traceability systems, geolocation of smallholders and forest monitoring systems

and maps. This includes [Kenya's](#) and [Cameroon's coffee sector](#), [Costa Rica's timber sector](#), and [Peru's coffee and cocoa sector](#). Further delays or changes undermine the EU's credibility and partnerships with producer countries.

Unsustainable cattle expansion is the world's biggest cause of commodity-driven deforestation, so it is essential the EUDR applies to both major drivers of cattle expansion: beef and leather.

Companies have had years to adapt and the [Forest 500 shows](#) many downstream companies exposed to leather are reporting increased action on traceability, so inclusion in the Regulation would pull in the same direction as trends in buyer demand.

- Spanish clothing company Inditex and automotive companies BMW Group and VW Group added traceability mechanisms for leather.
- French luxury goods company Kering bolstered traceability to the production unit by adding a compliance check against DCF standards.
- German sports shoe giant Puma and Italian leather processor Rino Mastrotto extended their traceability practices.

In 2025, 20 companies that produce and/or source leather in high- and unknown-risk regions were involved in collaborative action initiatives and partnerships including:

- [The Leather Working Group](#)
- [The Certification of Origin and Traceability Implementation Initiative](#)
- [The Fashion Pact Network](#)

Seven companies – including Adidas, Capri Holdings and Tapestry – joined the Deforestation-Free Call to Action for Leather, asking signatories to commit to source all their bovine leather from DCF supply chains by 2030 or earlier. The EU has a vital opportunity to bolster and reinforce these sectoral efforts to tackle deforestation; removing leather now will send the wrong signal.