

Ms Ursula von der Leyen
President
European Commission
1049 Bruxelles/Brussel
Belgium

4th April, 2025

Dear Ms von der Leyen

**Joint letter on behalf of the meat, hide and leather sectors:
Impact of the European Union Deforestation Regulation on trade of bovine hides and leather**

The undersigned organisations, representing the cattle to leather value chain, are grateful that a pragmatic approach has been taken to the introduction of the EU Regulation on Deforestation-free supply chains (EUDR). The agreed twelve-month delay will allow all parties time to ensure that the regulation is implemented smoothly. It will also allow time for completion of the biennial review of the scope of the regulation (Article 34) before its implementation, and to ensure that the list of regulated commodities and relevant products is appropriate and will bring about the meaningful change in deforestation practices that is intended.

Bovine hides, skins and leather (HS41) are listed in Annex 1 of the regulation, but no scientific evidence supports a causal link between leather and deforestation. Since these products are thus not drivers of deforestation withdrawing them from the scope of the EUDR would be a low-hanging fruit in the simplification you advocated last year. Consequently, we call on the Commission to remove these relevant products from the scope of the regulation. Furthermore, we urge the Commission to remove ovine and caprine products from any list of products for consideration for inclusion in Annex 1 during the review process.

We are hopeful that the research by the University of Pisa (Sant'Anna School of Advanced Studiesⁱ), which has clearly demonstrated that leather can't be considered seriously a driver of deforestation, will duly be taken into consideration during the review process. This scientific evidence, that was missing in the original impact assessment, is now available and shows that the inclusion of hides and leather in the scope of the EUDR is unlikely to have any impact on deforestation. A brief summary of the research, by the project sponsor, UNIC, is appended for your convenience.

However, the research also shows that implementation of the EUDR will have serious, negative economic, social and environmental impacts, both within and without the EU. In addition, allowing the more than 300 million hides produced every year by the meat industry to rot in landfill would add over 100 million tonnes of CO₂e to the atmosphere. The production of leather already avoids waste of approximately 60% of hides and the ambition should be to increase that figure. Furthermore, displacing leather will result in greater consumption of damaging, fossil fuel-based synthetics.

While we are wholly supportive of the overarching ambition to eliminate products from areas of deforestation from EU supply chains, we are concerned that the requirements for leather traceability through international supply chains will be very difficult, if not impossible, to achieve on time in most extra-EU countries. The inadequacies of the regulation and systems for its delivery are starkly highlighted by its potential impact on the trade of bovine hides and leather. Bovine hides are secondary products from the meat and dairy sectors that are traded across the globe for the production of leather. The production also yields further animal by-products used for the manufacture of gelatine and collagen, for use in food and biomedical products.

The regulation requires that hides should be traceable back to the birth farm of the animals from which they originate. However, the statutory chain of custody that exists for meat does not apply for its by-products and is broken when the hide is removed from the animal at the abattoir. As a by-product, there is no robust system to share upstream data on the origin of the hide with downstream users, making it all but impossible for a hide trader or leather manufacturer to trace with certainty the origin of their raw materials to any point before the abattoir.

This is the case for the vast majority of hides produced globally. Moreover, the absence of relevant beef imports in the EU and the low value of hides means there is no incentive to implement costly traceability systems just for hides. Significant hurdles exist, including the capacity of smallholders to provide the required geolocation information for animals that may change hands several times before slaughter and strict privacy limitations imposed by data protection laws in many countries.

The current unpredictability and uncertainty over implementation of the regulation and very real risk that compliance will be difficult in the EU and nearly impossible for international supply chains, is already creating bottlenecks, blockages, trade issues and damage across the whole of this supply chain.

In light of the evidence that inclusion in Annex 1 of relevant products of HS41 in the EUDR will not have any effect on global deforestation but will cause significant disruption of trade, potential major closure of EU tanneries with consequent decrease in employment as well as, negative economic, social and environmental effects, we call on the European authorities to:

- Remove all HS41 products listed in Annex 1 from the scope of the regulation on the basis that they are not a driver of deforestation.
- Remove ovine and caprine products from any list of products for consideration for inclusion during the review process.

Signatories



International Meat Secretariat



International Council of Hides,
Skins & Leather Traders
Associations



International
Council of Tanners



Confederation of National
Associations of Tanners and
Dressers of the European
Community



European Confederation of the
Footwear Industry



Africa Leather and Leather Products
Institute



ahslea

AUSTRALIAN HIDE, SKIN
& LEATHER EXPORTERS
ASSOCIATION

Australian Hide, Skin & Leather
Exporters Association

LEATHER AND HIDE
COUNCIL OF AMERICA

Leather and Hide Council of
America



Brazilian Footwear Industry
Association



Centre for the Brazilian Tanning
Industry



China Leather Industry
Association



HUP

Udruga prehrambene industrije i poljoprivrede

Croatian Association of Food
Industry and Agriculture



HUP

Udruga prehrambene industrije i poljoprivrede

Croatian Association of Textile and
Leather Industries



Czech Footwear
and Leather Association



French Footwear Federation



ASSOCALZATURIFICI

Italian Footwear Manufacturers'
Association



National Association of Italian
Manufacturers of Footwear,
Leathergoods and tanning
Technologies



ASSOPELLETTIERI

Italian Leathergoods
Manufacturers' Association



Confederation of Italian Fashion Accessories



Federation of Spanish Footwear Industries

Federación de Industrias del Calzado Español



Taiwanese International Leather Association



Turkish Leather Industrialists Association



UK Leather Federation



Italian Tanners' Association



German Leather Federation



Trade Association for the Dutch Hide Trade



German Association for hides/leather

APPENDIX

EUROPEAN TANNING INDUSTRY AND ANTI-DEFORESTATION REGULATION EUDR ANALYSIS BY SANT'ANNA SCHOOL OF ADVANCED STUDIES - UNIVERSITY OF PISA

Leather is not a deforestation driver. This is an obvious element for anyone involved in the leather supply chain, from farmers to fashion brands, but, with the unexpected inclusion of bovine leather in the scope of application of the EUDR anti-deforestation Regulation n.1115/2023 (inclusion not preceded by an impact analysis on the European market by the EU Commission, a unique case among the goods covered by the EUDR), it has become essential to support this fact with a detailed analysis on the matter.

The study ["Socio-economic and Environmental Analysis of the Effects of Regulation 2023/1115/EU on the European Leather Sector"](#) conducted by the Sant'Anna School of Advanced Studies of the University of Pisa between December 2023 and September 2024 contains important technical, socio-economic and environmental assessments regarding the relationship between bovine hides/leathers and deforestation and the effects, on the relevant European supply chain, of its inclusion in the EUDR.

Please find below the main conclusions of the analysis.

- **No direct link to deforestation.** The study, supported by extensive technical analysis (over 94 million documents, more than 29,200 active periodicals, over 330,000 books) and 28 interviews with stakeholders, found no direct link between leather and deforestation. Leather is a by-product from cattle raised for meat and milk and its production does not encourage cattle farming or affect it in any way.
- **Severe economic and social impact.** The EUDR's stringent traceability requirements risk severely compromising European bovine hides supplies, leaving European tanners without the necessary raw materials. This would lead to a sharp decline in EU tanning production (estimated to be up to more than a third), the closure of many companies and significant job losses across the entire supply chain.
- **Greater environmental risks.** The study warns that the aforementioned short-circuiting of the European leather industry due to the EUDR and the replacement of leather with synthetic alternatives, i.e. polyurethane materials, could seriously lead to a greater environmental impact, in terms of increased emissions and resource use. Diverting cowhides to landfills or countries with lower environmental standards would ultimately undermine the goals of the Green Deal.

From the following links you can download the following original documents in English:

- [Highlights](#) of the study
- [Executive Summary](#)
- [Full analysis](#)

ⁱ [Socio-economic and Environmental Analysis of the Effects of Regulation 2023/1115/EU on the European Leather Sector](#),