



Summary

Trase data and intelligence has been used by the European Commission, member state governments, enforcement agencies, politicians and civil society groups in the creation of the EU deforestation regulation – the first-ever legislation aimed at breaking the link between deforestation and the trade in agricultural commodities.

Photo: Loading soy on a ship (Pulsar Imagens/Adobe Stock Photo).

July 2025

Trase and the EUDR: Motivating and enabling world-first legislation to tackle commodity- driven deforestation

In June 2023, the [European Union deforestation regulation \(EUDR\)](#) entered into force with a legal compliance framework to guarantee that the products EU citizens consume do not contribute to deforestation or forest degradation worldwide. In December 2023, the UK announced the introduction of a regulation on [Forest Risk Commodities](#) limiting imports of commodities grown on illegally deforested land. Both regulations place unprecedented environmental conditions on commodity trade.

Trase played significant roles in strengthening the evidence base for both regulatory processes, helping operationalise aspects of their implementation, and enabling accountability of both government and businesses to deliver on their requirements.

Making the strategic case for demand-side regulations

In order to eliminate deforestation from commodity supply chains, there has been growing consensus on the need for demand-side regulation – legal requirements to raise the floor on minimum standards for securing market access and give an advantage to more responsible and sustainable supply chain companies and markets. The EUDR is by far the most ambitious and wide-reaching regulation governing the import of commodities linked to deforestation ever to be introduced.

In 2019, the European Commission adopted the [Communication](#) on stepping up action to protect and restore the world's forests, which launched an assessment to recommend policy options to minimise the impact of EU consumption on deforestation and forest degradation.

Trase's data and research played a pivotal role in making the strategic argument that regulation was not just necessary, but also feasible to implement – motivating ambition while also disarming long-held arguments and excuses that supply chains are too opaque and complex.

For example, Trase data formed the backbone of the report '[Stepping up? The continuing impact of EU consumption on nature](#)' published by WWF in April 2021 as the EU Commission developed its legislative proposal. This report was a central part of the #Together4Forests campaign convened by WWF which successfully mobilised public support for the EUDR. Trase's analysis provided the most comprehensive assessment of the EU's deforestation footprint to date, demonstrating not only that it was the second most important international market for forest-risk commodities (after China), but also highlighting the commodities, companies and regions most affected, helping shape the focus of the legislation and providing a pathway for implementation.

Shaping priorities

Trase insight was also brought to bear in helping shape the scope of the EUDR in terms of commodities and ecosystems at implementation and during future reviews.

In 2021, Trase provided the underlying evidence for a civil society campaign led by Fern and Mighty Earth, highlighting the critical importance of soy cake in dominating European soy imports from Latin American, and helping motivate the inclusion of soy cake in the final scope of the legislation.

In 2022, a high-profile Trase report commissioned by the Greens/EFA group in the EU Parliament brought attention to the huge gap in the scope of the legislation due to the exclusion of the Cerrado, the world's most biodiverse savannah ecosystem that falls largely outside the Food and Agriculture Organization's definition of forests as used by the Commission. Trase's report clearly demonstrated that the Cerrado is by far the largest hotspot of deforestation exposure linked to the EU's soy and beef imports, helping ensure the inclusion of a targeted one-year review on the option to extend the scope of the EUDR to include the FAO's designation of 'other wooded lands' as well as a two-year review on other natural ecosystems.

Aside from the EUDR, the UK's Forest Risk Commodities due diligence legislation is the second demand-side regulation governing the links between commodity trade and deforestation. Estimates of the UK's deforestation footprint through the Global Environmental Impacts of Consumption (GEIC) indicator, developed by SEI York and Trase, were important in setting the scope of this legislation while also helping underpin the work of campaigners to advocate for swift action. GEIC data is now used as an official UK government indicator to assess the global biodiversity impacts of UK economic activity. SEI and Trase are under commission to develop the monitoring framework for the legislation for the UK Government.

Supporting operationalisation

Trase has worked closely with a number of European governments, including Belgium, Germany and the UK, to help them understand their overall deforestation footprints, as well as embedded impacts on biodiversity and water, and to monitor how these are changing over time.

This work provides a much broader perspective than is necessary for EUDR compliance, but is a critical complement in motivating the need to assess overall country-level deforestation footprints and to inform the wider policy mix that is needed.

Trase also worked with France's Ministry of Ecological Transition to develop a risk dashboard, hosted by the French government, for soy imports under their national strategy to combat imported deforestation (SNDI) – itself a precursor of EUDR.

"Working with Trase was a key part of our success in strengthening the anti-deforestation regulation (EUDR). Their data and analysis were not only robust and compelling, but they were also essential in demonstrating the environmental risks of excluding ecosystems like the Cerrado and the Gran Chaco. Thanks to this collaboration, we convinced the whole European Parliament of the importance of using this definition for the regulation. After the negotiation with the Council, we secured a review clause about the inclusion of 'other wooded land' in the final legislation. We couldn't have done it without Trase's insight."

Marie Toussaint,
member of European
Parliament and shadow
rapporteur for the EUDR
for the Greens/EFA group of
the EU Parliament

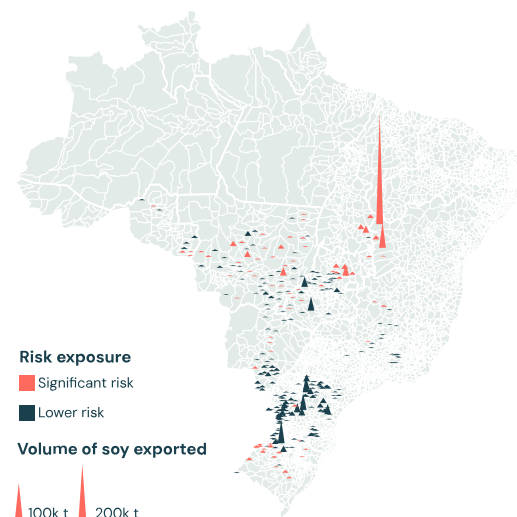
"Trase has fundamentally reshaped the deforestation policy landscape in the UK."

Katie Caudle,
senior supply chains policy
adviser, UK International
Forests Unit

The power of Trase data: risk benchmarking

Exporting municipalities

By volume and risk exposure



In 2022, Trase created a risk assessment dashboard for the French government to support its strategy against imported deforestation. It shows how much soy companies import into France and where in Brazil it is grown, differentiating between soy imports associated with low and high deforestation risks.

As EU member states invest in preparedness measures ahead of the expected implementation of the EUDR in January 2026, Trase is active in providing guidance to competent authorities on the use of Trase's risk data to triage due diligence compliance checks.

In June 2025, Trase and ClientEarth published guidance for companies regulated under the EUDR and competent authorities responsible for enforcing it on [the use of geospatial data](#) on the location of forests, types of land use and the existence of deforestation to assess risks of non-compliance with the regulation's deforestation-free and legality requirements.

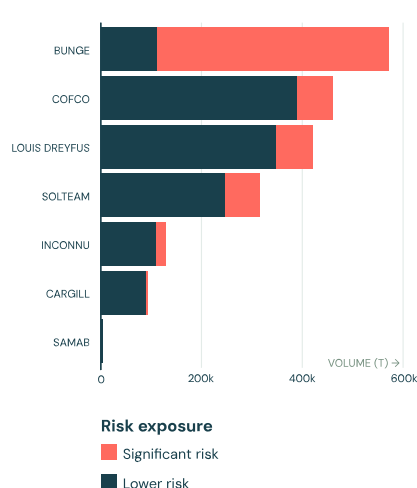
Strengthening accountability

It is unlikely that the EUDR or the UK Forest Risk Commodities regulations would exist without civil society pressure and the work of high-ambition coalitions in both government and business. Trase's data and intelligence continue to provide a key source of evidence to help motivate ambition and protect against backsliding.

This support includes providing targeted briefings to strengthen accountability of governments to deliver on stated ambitions. One example is the use of Trase data to underpin a [campaign by Global Witness](#) at the COP28 climate conference in 2023 to call out delayed adoption and implementation of the UK Environment Act first proposed two years before at COP26. In 2024, Trase also published the first editions of a [series of 27 factsheets](#) assessing the deforestation exposure via imports of EUDR commodities for each EU member state to support civil society in each country to make the case for action on implementation.

Importing companies

By volume and risk exposure



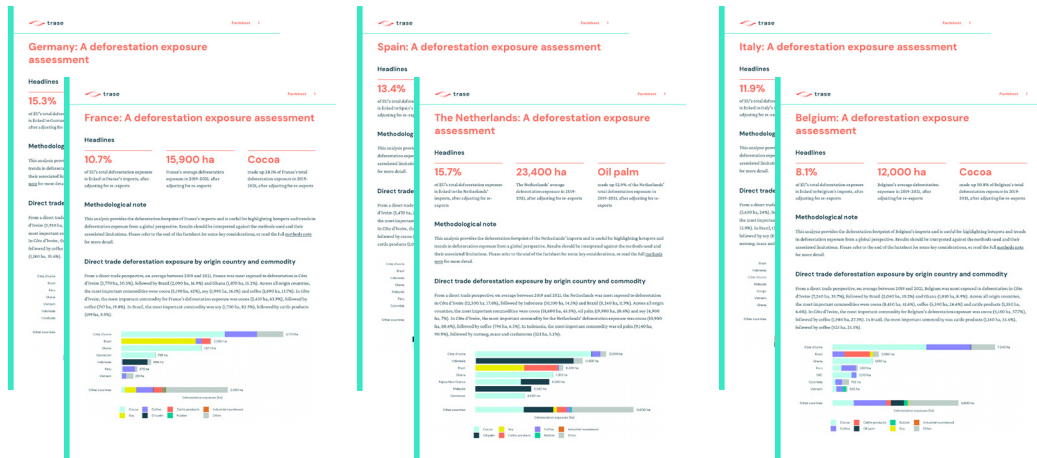
"Commissioned by and in collaboration with GIZ, Trase produced significant new analysis showing – in unprecedented breadth and detail – how Germany's import and consumption of agricultural commodities is linked to tropical deforestation. The resulting report successfully puts numerous disparate datasets in context with one another to demonstrate their significance for trade and environmental policy. This analysis will inform ongoing dialogue with producer countries and contribute to supporting risk assessments that importers in Germany will have to carry out as part of their due diligence requirements."

Katja Albrecht,
adviser, GIZ

"Trase, with the collaboration of the European Forest Institute, has done a very important job of compiling and processing data from the main tropical countries producing soybeans (and other products at risk of deforestation), making it possible today to estimate the risk of deforestation for most soybean imports in France."

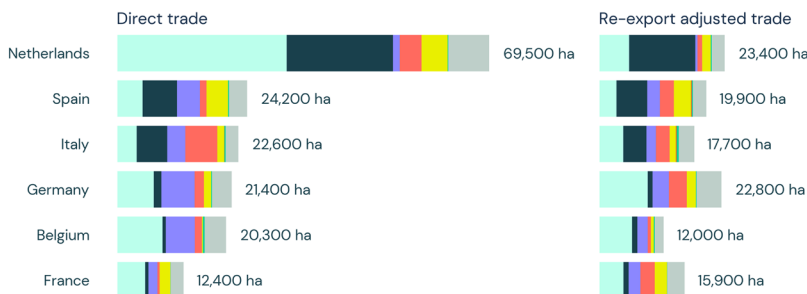
France's Ministry of Ecological Transition

Trase puts EU27 in the spotlight for deforestation exposure



In 2024, Trase published 27 country factsheets on the deforestation exposure of each EU member state. The results reveal striking differences as the countries prepare to implement the EUDR. For example, the Netherlands has three times the deforestation exposure of Spain due to the importance of the Port of Rotterdam for imports into the EU. Oil palm products are most significant for the Netherlands and Spain, whereas soy is most significant for Denmark, Slovenia and Romania.

A) Top six EU countries by deforestation exposure



B) Selected other EU countries

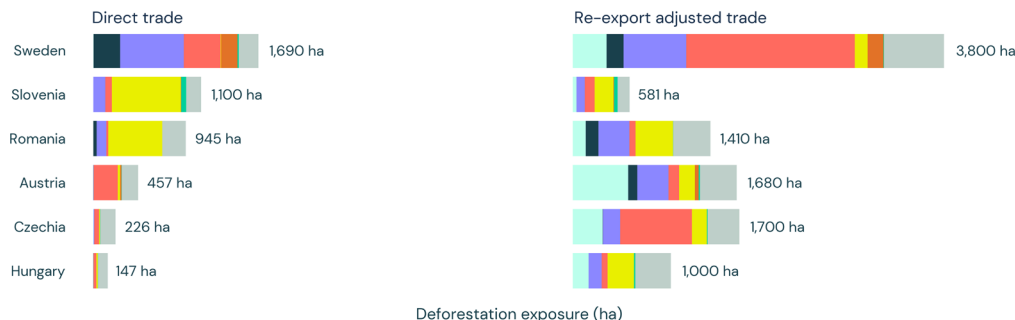


Figure shows deforestation exposure for selected EU countries by commodity in 2019–2021 for direct trade and adjusted for re-exports (Source: Trase analysis using data from UN FAO, UN Comtrade and DeDuCE).

The impact of Trase's data is often amplified by campaign groups working to strengthen accountability of governments and companies. For example, Mighty Earth, an environmental advocacy organisation, draws regularly on Trase data and maps to make the case in its global campaign against deforestation.

Ensuring successful implementation

Since the European Parliamentary elections in June 2024, there have been growing calls to weaken the EUDR resulting in a one-year delay in its implementation to 30 December 2025 to allow additional time for regulated companies and member states to prepare. Despite this, some member states and businesses continue to demand further concessions.

Trase believes that successful implementation of the EUDR is key both to reducing the deforestation exposure of the EU and – most significantly – stimulating action towards decoupling commodity production and trade from deforestation and ecosystem conversion by both key importing markets and producer countries.

As an independent science-based provider of data and intelligence, Trase will continue to use its analytical expertise – not just to support the implementation of the EUDR – but to understand its limitations and unintended consequences, such as leakage and smallholder exclusion, and the need to go beyond it with additional actions needed to successfully protect forests, other natural ecosystems, human rights and livelihoods. This work is an important element of our strategy for 2025–2030.

"Trase provides unique, reliable data that informs our global work to stop deforestation, protect nature, and fight climate change."

Alex Armstrong,
vice president of programs,
Mighty Earth



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Trase is a global partnership
co-founded by the Stockholm
Environment Institute and
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