

**Submission to the Public Consultation on
Proposed Amendments to Annex I of
Regulation (EU) 2023/1115 (EUDR) –
Retention of Leather in Scope**

1. Executive Summary

The Alliance for Human Rights in Supply Chains – a network of Brazilian organizations – hereby opposes the exclusion of leather from supply chains within the scope of EUDR 2023/1115.

Leather is a direct byproduct of the livestock supply chain and shares the same production environment. Therefore, it is an inherent byproduct of that supply chain before it actually becomes leather.

The livestock supply chain is historically marked by human rights violations, extensive land use, and conflicts. Excluding leather from the EUDR opens loopholes for continued human rights violations in the territories and access to the European market of products derived from deforestation, slave labour, and other human and labour rights violations.

The following are some examples of what the exclusion of leather from the EUDR may cause, given that livestock farming is historically marked by serious risks: illegal deforestation, as in the case of the Brazilian Amazon;¹ invasion of Indigenous territories;² land grabbing and illegal invasion;³ labour violations and modern slavery.⁴

Above all, from an economic perspective, excluding leather from the EUDR would weaken regulation as well as risk control and compliance in the livestock supply chain. According to the Cultivar magazine,⁵ bovine leather accounts for about 12%-14% of livestock's added value, and Brazil exported US\$ 1.26 billion⁶ in

¹ REPÓRTER BRASIL. Avanço da pecuária na Amazônia pode desmatar área igual à Irlanda até 2030. Nov. 17, 2022. Available at: <https://reporterbrasil.org.br/2022/11/avanco-da-pecuaria-na-amazonia-pode-desmatar-area-igual-a-irlanda-ate-2030/>. Accessed on: May 21, 2026.

² REPÓRTER BRASIL. Gado criado ilegalmente em terra indígena no Pará abastece JBS e Frigol. Sept. 15, 2022. Available at: <https://reporterbrasil.org.br/2022/09/gado-criado-ilegalmente-em-terra-indigena-no-para-abastece-jbs-e-frigol/>. Accessed on: May 21, 2026.

³ HOFMEISTER, N.; CAMPOS, A. Caso de grilagem liga frigoríficos a rede de corrupção e lavagem de dinheiro. Repórter Brasil, May 23, 2024. Available at: <https://reporterbrasil.org.br/2024/05/caso-grilagem-frigorificos-corrupcao-lavagem-dinheiro/>. Accessed on: May 29, 2026.

⁴ REPÓRTER BRASIL. Monitor Monitoramento de Casos: Trabalho escravo na indústria da carne. Dec. 2020. Available at: https://reporterbrasil.org.br/wp-content/uploads/2020/12/Monitor-8_Trabalho-escravo-na-industria-da-carne.pdf. Accessed on: May 23, 2026.

⁵ VALLE, E. R. do. **Couro: você sabe quanto vale?** Revista Cultivar, [s. d.]. Available at: <https://www.revistacultivar.com.br/artigos/couro-voce-sabe-quanto-vale>. Accessed on: May 29, 2026.

⁶ CENTRO DAS INDÚSTRIAS DE CURTUMES DO BRASIL (CICB). Exportações brasileiras de couros e peles: Dezembro 2024. Jan. 2025. Available at: https://cicb.org.br/images/uploads/posts/exportacoes-brasileiras-de-couros-e-peles-dez24-vr_1736425665.pdf. Accessed on: May 23, 2026.

bovine leather worldwide only in 2024. When it comes to European countries, Germany alone imported 2,487,642 tonnes in the same year. Therefore, excluding leather from the EUDR will weaken the legislation, and companies and suppliers that resort to deforestation for livestock farming will be able to reduce traceability of their products.

2. Leather is part of the livestock supply chain

The leather supply chain is not isolated or independent; it is part of a wider livestock chain. By excluding it from the EUDR, other products in the chain will be less traceable, since items such as meat, hides, leather, gelatine, collagen, and beef tallow are also extracted from cattle.

The existence of significant human rights and environmental risks in the livestock supply chain does not disappear when leather is excluded, which stresses the need to strengthen regulation for all products derived from it. Excluding leather could create inconsistent regulations for different products from the same supply chain, which may weaken the EUDR.

3. Invasion of Indigenous territories and land conflicts

Expanding pasture areas with the mere purpose of boosting production in the livestock industry leads to increasingly serious land conflicts and invasion of Indigenous territories. According to the InfoAmazonia portal, 114,000 hectares of Indigenous territories – an area the size of Switzerland – were deforested and turned into pastureland from 2018 to 2021.⁷ About 70% of these deforested pastures were located within Indigenous territories in the Amazon. By deforesting, in addition to causing environmental damage, livestock farming undermines the autonomy of Indigenous communities, which become more susceptible to suffering violence and losing their territories.

⁷ AMÂNCIO, T. Expansão de pastagens em Terras Indígenas triplica em 4 anos e ameaça povos isolados da Amazônia. InfoAmazonia, May 4, 2023. Available at: <https://infoamazonia.org/2023/05/04/expansao-de-pastagens-em-terras-indigenas-triplica-em-4-anos-e-ameaca-povos-isola-dos-da-amazonia/>. Accessed on: May 29, 2026.

According to Repórter Brasil, large meatpacking companies such as JBS, Minerva, Marfrig, and Friboi received products from these areas⁸. Brazil exported 128,000 tonnes of beef to Europe, according to data from the Ministry of Agriculture and Livestock. Even though it is a different product, reducing the scope would open the door for leather originating from deforestation to reach Europe.

4. Slave and child labour in the livestock supply chain

Slave labour and deforestation are often connected, especially in high-risk supply chains such as livestock farming. Historically, vulnerable rural workers are exposed and attracted to jobs in areas far from urban centres, where they suffer several forms of human and labour rights violations, while the territory sees economic growth as result of deforestation and the use of underpaid or unpaid labour. Data from the Continued PNAD survey for the 4th quarter of 2025 show that cattle farming is the sector with the highest rates of informal labour, which reaches 607,000 workers.

This can also increase vulnerability to other labour rights violations, including the risk of child labour in rural environments marked by low social protection and poor law enforcement.

According to the Radar SIT Child Labour report, 174 children and adolescents⁹ were rescued from forced labour in livestock farming between 2017 and 2025. During the same period, 471 children and adolescents were rescued from jobs such as tanning and other leather preparations, manufacture of travel goods and several leather items, as well as footwear and its parts.

⁸ REPÓRTER BRASIL. Novos casos de trabalho escravo envolvem maiores frigoríficos do país. Oct. 2025. Available at: <https://reporterbrasil.org.br/2025/10/novos-casos-trabalho-escravo-maiores-frigorificos-pais/>. Accessed on: May 29, 2026.

⁹ BRASIL. Ministério do Trabalho e Emprego. **Radar do Trabalho Infantil**. Brasília: MTE, [2026?]. Available at: <https://qlik-publico.paineis.gov.br/extensions/radar-trabalho-infantil/radar-trabalho-infantil.html>. Accessed on: May 29, 2026.

According to the Climate Rights International's report "Before it's too late: Halting deforestation and human rights violations driven by livestock farming in Brazil,"¹⁰ farmers who clear Brazilian forest land subject their employees to forced labour in addition to other forms of exploitation at work. The mechanisms for reducing this type of violation include increased efforts to combat deforestation.

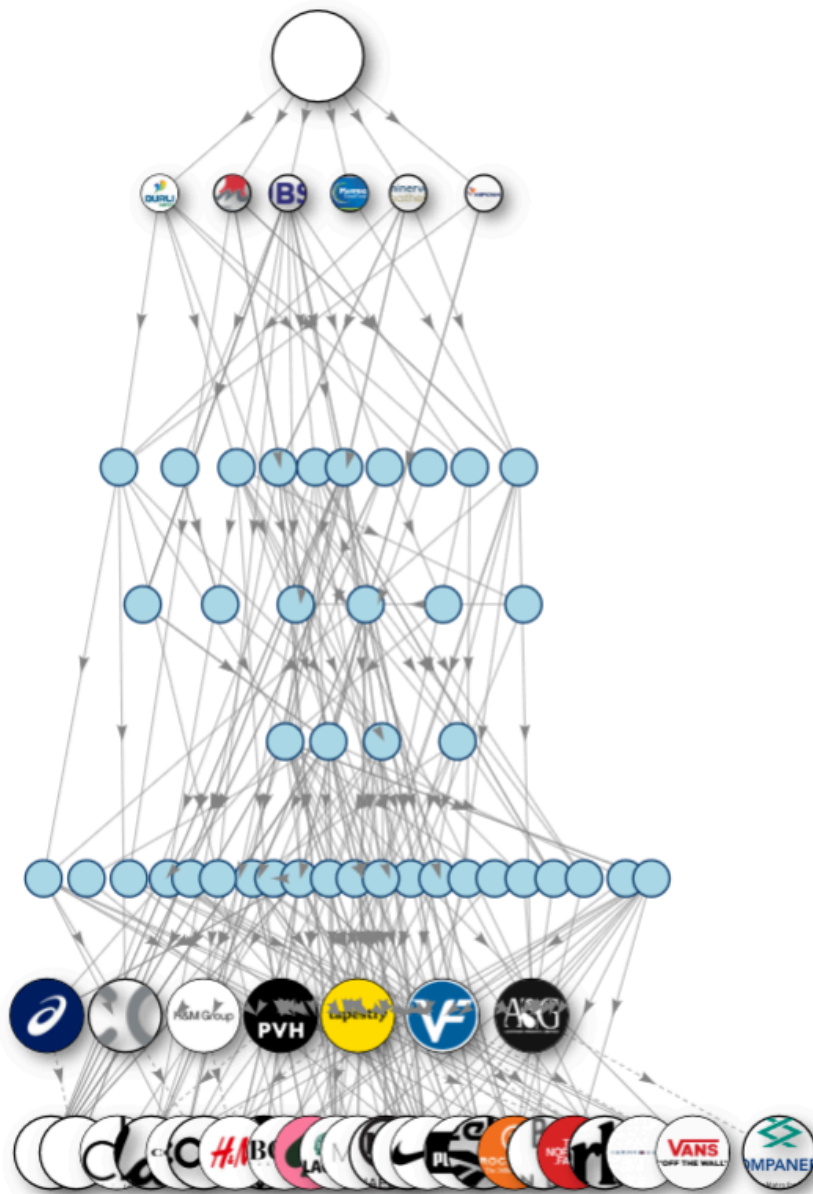
Historically, workers are drawn to remote areas, far from urban centres, by promises of decent jobs. However, differently from what they expected, they end up working long hours and coerced into life-threatening labour conditions.

The report says that workers are found in unhealthy situations. According to CRI, workers, including minors, were found living under precarious plastic tarps with no sanitation, and operating chainsaws without protective equipment. The organization also says that they had no way to communicate with the outside world or leave the place on their own.

In addition to undermining the EUDR, the exclusion of leather would also indirectly weaken the European Regulation to Combat Forced Labor (EUFLR) by reducing the need for leather control, thus creating a regulatory loophole in both legal frameworks.

Based on an investigation conducted by the Stand.earth Research Group, The CRI report also found 24 international brands connected through tanneries in 2023 and 2024. These brands include footwear and sportswear companies such as Adidas, Asics, Converse, New Balance, Nike, Puma, Reebok, Rockport, The North Face, and Vans, as well as fashion and apparel brands including Calvin Klein, Clarks, Coach, ECCO, H&M, Hugo Boss, Kate Spade, Kompanero, Lacoste, M&S, Michael Kors, Ted Baker, Timberland, and Tommy Hilfiger.

¹⁰ CORPORATE ACCOUNTABILITY RESEARCH (CRI). Before it's too late: a report on the leather industry's impact on communities and the environment. London: CRI, Sept. 2019. Available at: <https://cri.org/reports/before-its-too-late/>. Accessed on: May 29, 2026.



Source: Stand.earth ([2025?]).

According to the investigation, it is not possible to prove that these companies used leather from those tanneries, but the product is present in their supply chains. Furthermore, the connections found by the investigation indicate that these companies' supply chains include producers involved in cases of environmental damage and human rights violations. Excluding leather opens the door for forced labour cases connected to deforestation caused by livestock farming.

5. Regulatory loophole

Excluding leather could create major regulatory distortions, since it would lead to significant fragmentation of due diligence obligations regarding human rights and the environment. Following the exclusion, different products derived from the same supply chain – in this case, livestock – may face different regulatory requirements even though their production is subject to the same risks. This would not only weaken regulation but also decrease product traceability, undermining the effort to provide companies with regulatory incentives to implement product tracking systems.

Another potential consequence of excluding leather from the EUDR is that some commercial agents may benefit from reduced requirements. In addition, weaker regulations resulting from that exclusion may create traceability loopholes.

The exclusion will also weaken other regulations such as the CSDDD,¹¹ which recognizes that supply chains must map out their human rights and environmental risks, therefore causing misalignment. Furthermore, CSDDD's guidelines include better protection of human rights such as labour rights; mitigation of climate change; greater transparency; and impacts on traditional populations and Indigenous peoples, which would be weakened by leather's exclusion.

The European Union, through the EU Charter of Fundamental Rights¹², has made commitments to human dignity, prohibition of forced labour, Indigenous peoples' rights, and environmental protection. Excluding

¹¹ EUROPEAN COMMISSION. **Corporate sustainability due diligence**. Brussels: European Commission, [2024?]. Available at: https://commission.europa.eu/topics/business-and-industry/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en. Accessed on: May 29, 2026.

¹² EUROPEAN PARLIAMENT. Charter of Fundamental Rights of the European Union. Luxembourg: Office for Official Publications of the European Communities, Dec. 18, 2000. Available at: https://www.europarl.europa.eu/charter/pdf/text_en.pdf. Accessed on: May 29, 2026.

these elements may undermine monitoring and hinder stronger protection.

The UN Guiding Principles on Business and Human Rights¹³ address the duties of States and businesses. It is States' duty to protect people and promote their development. Excluding leather from the EUDR sets a precedent allowing States not to fulfil their duties. Just as the Principles address businesses' responsibility to conduct risk analyses and mitigate them, keeping leather in the Regulation will strengthen the instrument and advance the mitigation of risks and violations.

Excluding leather from the scope of the EUDR contradicts OECD Guidelines on Responsible Business Conduct¹⁴, which address businesses' behaviour and prescribes due diligence focused on supply chain risks and land rights, considering the growing rural violence and land grabbing to expand pastureland that increases violence against Indigenous peoples and forced labour.

6. Final Recommendation / Request to the Commission

The Alliance for Human Rights requests that the Commission maintain bovine leather as one of the supply chains covered by the EUDR, since it is derived from and directly integrated into the livestock chain and has the same risks associated with human and labour rights violations.

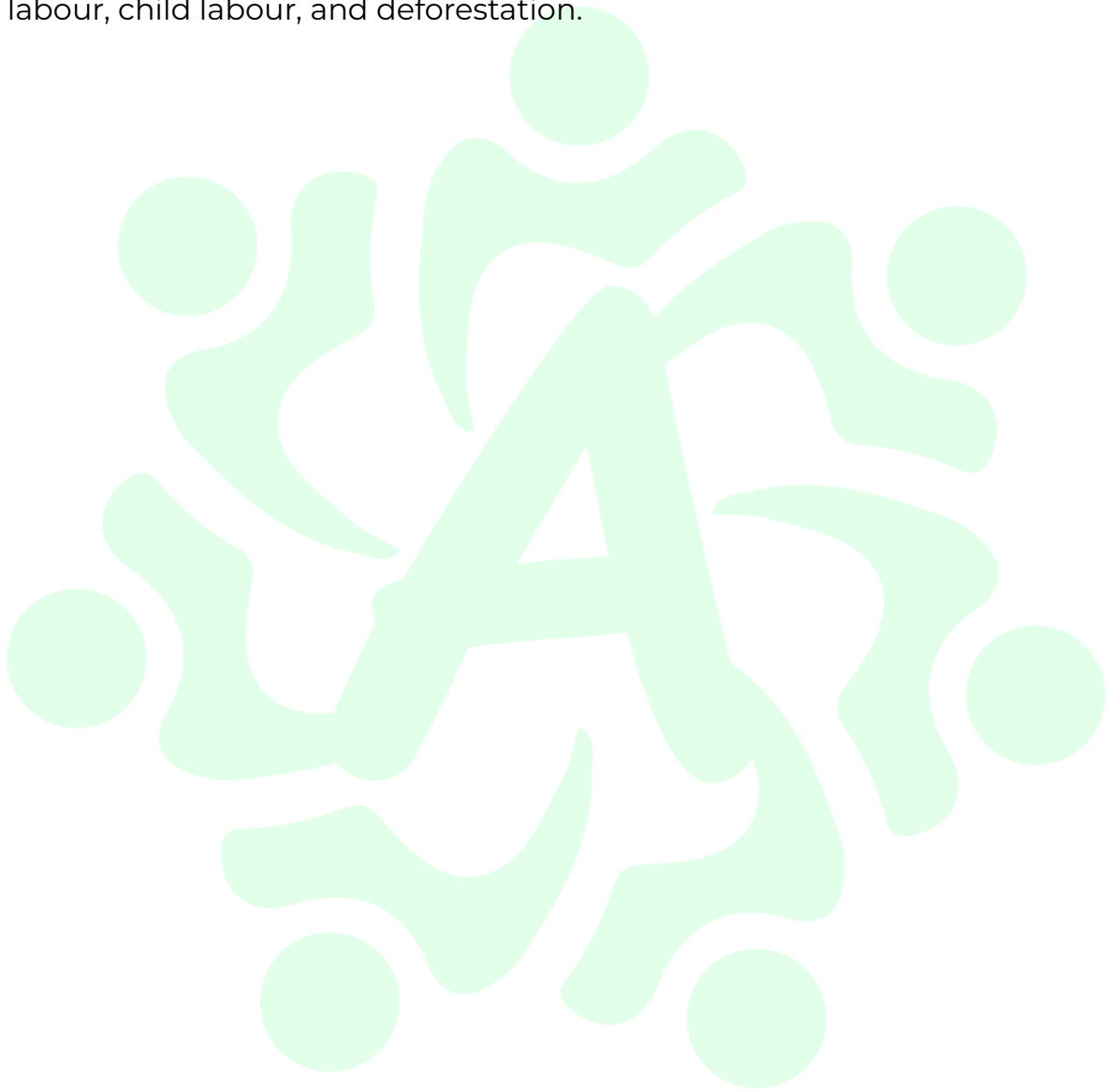
We request that the EUDR preserve the integrity of due diligence duties in human and environmental rights throughout the livestock chain, since

¹³ UNITED NATIONS. Office of the High Commissioner for Human Rights (OHCHR). Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework. New York; Geneva: United Nations, 2011. Available at: https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf. Accessed on: May 29, 2026.

¹⁴ ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD). OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Paris: OECD Publishing, 2023. Available at: https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990/81f92357-en.pdf. Accessed on: May 29, 2026.

the whole chain and its derivatives have their responsibilities and are economically important aggregators.

We also request that regulatory loopholes be avoided, since excluding leather from the chain increases the risk of losing product traceability, which could lead to the marketing of products originating from forced labour, child labour, and deforestation.



About the Alliance for Human Rights in Supply Chain

The Alliance for Human Rights in Supply Chains is a network of civil society organizations and representatives of rural wage workers and family farming communities, committed to promoting human rights, decent work, and social justice across supply chains in Brazil.

The Alliance works through knowledge production, political advocacy, and multi-stakeholder engagement to address human rights violations and structural inequalities that affect sectors such as agriculture, industry, and emerging economies.

It is grounded in the recognition that supply chains are central to economic development, but also reproduce historical inequalities, especially those related to race, gender, and income.

In this context, the Alliance advocates for the development of fairer, more sustainable, and more responsible supply chains, with a focus on ensuring decent working conditions, promoting adequate income, and respecting human rights.

The Alliance also engages with national and international agendas, contributing to the strengthening of public policies, regulatory frameworks, and corporate accountability mechanisms.