



DONAU SOJA ASSOCIATION

Promoting a sustainable and European protein supply

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Addressed to:

President of the European Commission
Dr. Ursula von der Leyen
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Vienna, 01 April 2026

Subject: Proposed high-iLUC classification of soybean oil under the Renewable Energy Directive threatens European protein production and must be revised

Dear Mrs. President von der Leyen,

On behalf of the undersigned organisations representing the European soy production and value chain, we would like to express our serious concern regarding the European Commission's proposal to classify soybean oil as a high-risk feedstock for indirect land-use change (iLUC) under the Renewable Energy Directive (RED), as set out in the proposed amendment to Delegated Act 2019/807. The proposal does not introduce any differentiation with regard to the origin or quality of soybeans, thereby treating fundamentally different production systems in the same manner.

At a time of geopolitical uncertainty, fragile global supply chains and increasing pressure on food systems, this proposal risks undermining key EU objectives on protein autonomy, food security and resilient value chains. If adopted in its current form, it could have significant consequences for European soya production and for the competitiveness of European processors.

Our key requests

We call on the Commission to adopt a revised framework grounded in three principles:

- 1. Differentiation based on the origin of the soybeans:** Soybean oil derived from European-grown soybeans must be exempt from high-iLUC risk classification and remain eligible under the RED. European soya is produced in largely deforestation-free contexts and should not be treated identically to high-iLUC risk imports from regions where land-use change is well documented.
- 2. Differentiation based on the quality of soybeans:** Existing certification schemes that certify against land-use change in general (no-LUC) — such as Europe Soya and others benchmarked under FEFAC — must be accepted without requiring an additional low-iLUC certification under the RED scheme.
- 3. Coherence with the EU protein strategy:** The framework must not contradict the Commission's own objective of reducing Europe's structural dependence on imported protein. Policy signals must support — not undermine — investment in sustainable European soya production, and supplementary analysis specifically addressing European production systems must be completed before any classification is finalised.

Threats to European production, processing and value chains

Soybeans are a cornerstone of Europe's integrated protein supply chain. The economic viability of soybean processing depends on its two co-products: soymeal for the feed sector and soybean oil. A significant share of soybean oil is supplied to the biofuels market. The biofuels market is a structural pillar of European processing, accounting on average for around 40% of soybean oil utilisation and up to 80% in certain facilities.

As the economics of European crushing fundamentally rely on the value of soybean oil, the removal of this revenue stream would make domestic soybean cultivation economically unviable in many regions. Losing access to the biofuels market would render many crushing operations uncompetitive, forcing a shift in capacity to other oil crops such as oilseed rape and causing a sharp decline in demand for European-grown soybeans. Rather than reducing global land-use pressure, this would increase the EU's dependency on soymeal imports from regions with higher deforestation risks and likely lead to increased direct and indirect land-use change in third countries. Such an outcome would directly contradict the RED's environmental objectives while inflicting lasting reputational damage and reduced investment on farmers and processors operating under strict sustainability standards.

Contradictions with EU strategic objectives

The proposed classification is difficult to reconcile with the EU's own strategic priorities. Europe's structural dependence on imported protein, particularly in the soya sector, represents a well-recognised vulnerability in its food and feed system. The European Protein Strategy was adopted precisely to address this dependency and to strengthen domestic production capacity. European soybean cultivation has grown, offering traceable, deforestation-free and sustainably produced protein within the EU.

The proposed classification would risk reversing this progress. A blanket high-iLUC classification sends contradictory signals to farmers, processors and investors. It risks discouraging further investment and expansion in European soya production, weakening domestic value chains and increasing reliance on imports at a time when strengthening strategic autonomy and supply resilience is stated as a core EU priority.

Donau Soja

Donau Soja is a member-based organisation representing more than 330 members from across the European soya sector. We are committed to promoting a transparent, deforestation-free European soya sector and resilient regional value chains. We emphasise that policy measures must recognise the fundamental differences between European production systems and high-risk regions.

We remain committed to the EU's goals of combating global deforestation and reducing land-use change. However, effective climate policy must be based on scientific rigour, proportionality and coherence. In our view, the current proposal does not sufficiently reflect these principles.

We stand ready to engage constructively with the Commission and look forward to an early dialogue.

Yours sincerely,

Matthias Krön
President, Donau Soja Organisation

Co-signing associations and companies

DEUTSCHER SOJAFÖRDERRING e.V. (Germany)

Martin Miersch, Executive Chairman

Soia Italia - Associazione proteine sostenibili (Italy)

Pietro Ciriani, President

Stowarzyszenie Polska Soja (Poland)

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Magyar Szója és Fehérjenövény Egyesület (Hungary)

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BAG Ölmühle BetriebsgmbH (Austria)

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Franco Rossetto, Founder

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Ing. Josef Bamberger, Managing Director

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Ing. Josef Bamberger, Managing Director

Soy Austria Produktions GmbH (Austria)

Ing. Josef Bamberger, Managing Director

Soya Mills S.A. (Greece)

Christos Prentos, Oilseeds Director

Soya Hellas S.A. (Greece)

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