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### Joint Statement

## The enactment of high ILUC-risk Delegated Regulation imperils Europe's protein ambitions and contradicts EU strategic policies

Ahead of the AGRIFISH Council of 26 May and the AOB debate about “*the classification of soya under the ILUC methodology*”, the undersigned organisations express serious concerns regarding the European Commission’s report on the status of production expansion of relevant food and feed crops worldwide and the subsequent Delegated Act [2026/2680](#) (amending Delegated Act [2019/807](#)). **The Delegated Act should be censured by the Council and the European Parliament through a Motion for Objection as the classification of soybean oil as a high-risk feedstock for indirect land-use change (iLUC), within the framework of Renewable Energy Directive (RED), falls short of the required EU standards of evidence-based policymaking.**

The addition of this Delegated Regulation, under the co-legislators’ scrutiny, to the agenda of the AGRIFISH Council stems from the lack of coherence between two different but overlapping EU policy areas. The Commission proposal risks substantially undermining the EU objectives for improved protein autonomy and food security. It would have significant consequences for the competitiveness of the European soy value chain and put a break on the EU soy production potential. Currently examining the CMO II Proposal (EU protein crops sector - [2025/0237](#)), the AGRIFISH Council should seek the highest policy coherence and scrutinize the incompatibility with this Delegated Act. In a context of high geopolitical instability, a highly volatile energy market and shifting trade relations, the roll-out of the high-ILUC classification appears out of sync and puts a strain on the resilience of agri-food supply chains.

Soybeans are a cornerstone of Europe’s ambition to strengthen its protein supply. The production expansion is driven by demand for the soy meal which represents 80% of the crop. The economic viability of EU soybean processing depends, however, on both outputs: soy meal for the feed sector and soybean oil. While the share of soybean oil supplied to the biofuels market can considerably vary year-on-year, it is a structural pillar of European soy processing. Losing access to the biofuels market would render many EU crushing operations uncompetitive and cause a sharp decline in demand for European-grown soybeans, weakening domestic value chains and increasing reliance on imports of protein meals.

Classifying soy as a high ILUC feedstock would put EU soy production at risk, at a time when the Commission has prioritised the stimulation of EU protein production. Increasing the EU’s protein production and strategic autonomy requires strengthening investment in European soybean breeding as underlined in the *Vision for Agriculture and Food*. Soybean is a key crop for food and feed protein supply and its expansion in Europe depends on the development of innovative, competitive varieties capable of performing under increasingly challenging climatic conditions.

Cultivation of soybeans in the EU plays an essential role in diversifying crop rotations and improving soil health through nitrogen management. Soybean also allows for relatively lower fertilizer use which supports further reduction of the EU's dependency at a time when their availability and affordability is a serious concern and lowers farmers' input costs.

The proposed Delegated Regulation is based on a methodology containing serious flaws and data weaknesses that require a thorough overhaul to ensure transparent, fair, and non-discriminatory results. Some methodological decisions have led to wrongly attributing land expansion into forests to soy and have equally overestimated the real land use impact. Some parts of the data used have not been disclosed, raising transparency concerns and not allowing the calculations to be fully replicated to test their validity. Low-ILUC certification is not a realistic alternative due to the design of the criteria for which evidence is extremely difficult to obtain and bears considerable administrative and financial implications for farmers.

Considering the strategic role soy plays for enhancing EU food security, the evident lack of policy coherence between priorities under the upcoming Protein Plan and under the Renewable Energy Directive with an ILUC-methodology showing significant flaws, and having regard to the serious consequences for EU soy farming and processing, we urge the Council and the European Parliament to object to the adoption of the Delegated Regulation. At the very minimum, the Commission should withdraw the Delegated Regulation, thereby enabling a serious and thorough re-examination of the methodology and data choices that have mistakenly led to the categorisation of soy as high ILUC-risk.

*The signatories*

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