

The impacts of the European Union Deforestation-free Regulation (EUDR) on the Brazilian agri-food system: global governance, regulatory sovereignty, and climate justice

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Abstract

This research critically analyzes the impacts of the European Union Deforestation-Free Regulation (EUDR) on the Brazilian agri-food system. From this perspective, the EUDR, embedded into the European Green Deal, emerges as a potential mechanism for global governance of both the climate and the global agri-food system. The study discusses its potential impacts on the strategic supply chains of soybeans, beef, cocoa, and coffee, covering the regulatory, commercial, and political dimensions of the legislation. The central argument of this work is that, although anchored in legitimate environmental commitments, the EUDR reflects a use of extraterritorial regulatory power by the European Union that may reinforce North-South asymmetries and limit Brazil's regulatory autonomy, intensifying disputes along global value chains. This work articulates debates on climate justice, regulatory sovereignty, and environmental barriers by examining how the EUDR reconfigures the intersections between global food security governance and international climate regimes in the Global South. By adopting the EUDR as a case study, the research seeks to understand how changes in environmental governance emerge in response to global challenges and how they can reconfigure the role of exporting countries in the international sustainability regime. The study contributes to the debate on climate justice, international cooperation, and the challenges of building collaborative arrangements that are sensitive to environmental conservation and the diversity of contexts in global food trade.

Keywords: EUDR; Global Governance; International Trade; Climate Justice.

Resumo

Esta pesquisa analisa criticamente os impactos da Regulamentação Antidesmatamento da União Europeia (EUDR) sobre o sistema agroalimentar brasileiro. Nessa perspectiva, a EUDR, inserida no European Green Deal, emerge como um potencial mecanismo de governança global tanto do clima quanto do sistema agroalimentar global. O estudo discute seus impactos potenciais sobre as cadeias estratégicas de soja, carne bovina, cacau e café, abrangendo as dimensões regulatórias, comerciais e políticas da legislação. O argumento central deste trabalho é que, embora ancorada em legítimos compromissos ambientais, a EUDR reflete um uso do poder regulatório extraterritorial pela União Europeia que pode reforçar as assimetrias Norte-Sul e limitar a autonomia regulatória do Brasil, intensificando disputas ao longo das cadeias globais de valor. Este trabalho articula debates sobre justiça climática, soberania regulatória e barreiras ambientais ao examinar como a EUDR reconfigura as intersecções entre a governança global da segurança alimentar e os regimes climáticos internacionais no Sul Global. Ao adotar a EUDR como estudo de caso, a pesquisa busca compreender como as mudanças na governança ambiental emergem em resposta aos desafios globais e como podem reconfigurar o papel dos países exportadores no regime internacional de sustentabilidade. O estudo contribui para o debate sobre justiça climática, cooperação internacional e os desafios de construir arranjos colaborativos que sejam sensíveis à conservação ambiental e à diversidade de contextos no comércio global de alimentos.

Palavras-chave: EUDR; Governança Global; Comércio Internacional; Justiça Climática.

1. Introduction

Global governance has undergone significant transformations due to economic, climate, and health crises, in addition to the advancement of transnational environmental regulations. The interdependence between food systems and global environmental challenges has spurred new regulatory instruments that are reshaping relations among states, the private sector, and civil society. International food trade, already highly regulated, faces a growing set of technical, sanitary, and environmental standards, many of which are linked to sustainability and climate change (NAIDIN; VEIGA; RIOS, 2022).

Pendrill et al. (2019) explain that studies have shown that deforestation, the second largest source of greenhouse gas emissions, is largely driven by the expansion of agriculture and forestry, with a strong influence from foreign demand. Pendrill et al. (2019) argue that deforestation emissions account for a significant portion of 15% of the total carbon footprint of food consumption in European Union countries, which demonstrates the urgency of implementing political measures that act directly on international supply chains. In this context, the European Union Deforestation –Free Regulation (EUDR) emerges as a central example of how environmental governance

manifests on a global scale. As part of the European Green Deal, the EUDR (Regulation (EU) 2023/1115) prohibits the import into the bloc of products such as beef, cocoa, coffee, and soybeans that are linked to deforestation that occurred after December 31, 2020.

This measure, which seeks to reduce emissions and curb biodiversity loss, reflects the EU's attempt to internalize its climate commitments and promote more sustainable consumption patterns. By doing so, the EU advances a regulatory shift that incorporates environmental criteria directly into its trade policy, representing a transition from voluntary certification mechanisms to public, mandatory, and binding ones (FERNANDES, 2024).

The regulation acknowledges the importance of forests and the EU's historical responsibility for importing products linked to deforestation. Therefore, it imposes strict rules to restrict the entry and export of products related to environmental degradation, seeking to influence international practices and promote more sustainable consumption patterns (REGULATION (EU) 2023/1115). The EUDR covers products such as beef, cocoa, coffee, soybeans, wood, rubber, and palm oil, and defines what constitutes deforestation and forest degradation.

Sanctions and corrective measures are provided to curb non-compliance (REGULATION (EU) 2023/1115, Articles 24 and 25). A risk classification system for exporting countries, such as Brazil, is established, encouraging improvements in environmental enforcement for high-risk countries (REGULATION (EU) 2023/1115, Article 29). International cooperation is also emphasized as an essential instrument to combat deforestation, strengthen the rights of local communities, and ensure transparency in supply chains (Articles 29 and 30).

However, the EUDR, as a form of governance, is not exempt from controversy. By imposing traceability and due diligence standards without a consolidated multilateral negotiation process, it strains the principles of regulatory sovereignty and commercial predictability for exporting countries, such as Brazil. This lack of a structured dialogue with the World Trade Organization (WTO) leads to questions from nations in the Global South, who see the measure as a form of “regulatory imperialism” (FERNANDES, 2024).

The EUDR fits into this context as an instrument of environmental governance with extraterritorial effects, symbolizing a transition from private and voluntary forest certification mechanisms to unilateral public mechanisms of a mandatory and binding

nature (FERNANDES, 2024). The European law represents a regulatory shift by the European Union, which now incorporates environmental criteria directly into its trade policy, claiming coherence with the commitments made in the Paris Agreement (2015) and the European Green Deal, which establishes the goal of climate neutrality by 2050 at the latest.

The law translates the European effort to align trade and sustainability but also reveals the limits and contradictions of contemporary climate governance, marked by normative asymmetries and disputes between environmental universalism and the diversity of national contexts. Thus, understanding the EUDR from the perspective of global climate governance implies recognizing its dual role: on the one hand, as a "law with evident extraterritorial effects that challenges principles of sovereignty in forest regulation," as Fernandes (2024) argues; on the other hand, as an attempt to internalize international climate commitments, as we can observe in the regulation itself:

Combating deforestation and forest degradation constitutes an important part of the package of measures needed to reduce greenhouse gas emissions and to comply with the Union's commitments under the European Green Deal as well as with the Paris Agreement adopted under the United Nations Framework Convention on Climate Change (3) (the 'Paris Agreement'), and the Eighth Environment Action Programme adopted by Decision (EU) 2022/591 of the European Parliament and of the Council (4), and with the legally binding commitment under Regulation (EU) 2021/1119 of the European Parliament and of the Council (5) to reach climate neutrality at the latest by 2050 and reduce greenhouse gas emissions by at least 55 % compared to 1990 levels by 2030. (REGULAMENTO (UE) 2023/1115, 2023, p. 11)

At a time when the global governance of food security is moving out of merely sectoral forums to occupy the arena of public, business, and international policy, the EUDR emerges as an exemplary case of extraterritorial regulation with practical effects on producers, exporters, and regulators in developing countries.

This article is justified by the need to understand the regulatory, commercial, and political impacts of the EUDR on the Brazilian agri-food system and on the country's climate action. Although the debate on transnational environmental regulation has advanced, there is a scarcity of studies that articulate the EUDR with the global governance of food security and with regulatory sovereignty (DUTRA, 2022).

The work addresses this gap, seeking to fill the lack of critical analyses of the EUDR as an instrument of international regulatory power and its consequences for exporting countries in the Global South. This perspective is reinforced by authors like Margulis (2013), who already pointed to the transition from an international food security regime to a "regime complex," where conflicting norms and rules generate unresolved tensions. The study articulates the interaction between food security governance, climate regimes, and international trade to examine how the EUDR reconfigures the relationship between regulatory sovereignty and environmental justice in the Global South.

The central hypothesis holds that, although the EUDR has a legitimate environmental foundation, it expresses a form of international regulatory power that can accentuate North-South asymmetries, limiting Brazil's regulatory autonomy and intensifying disputes along global value chains. By exploring the interaction between global governance of food security and climate, regulatory sovereignty, and international trade, the work articulates debates on environmental barriers, climate justice, and the institutional responses of the Brazilian State. Furthermore, analysing the EUDR as a case study, the research seeks to understand how changes in environmental governance emerge in response to global challenges and how they can reconfigure the role of exporting countries in the international sustainability regime.

The article is organized in five sections. The first one presents the research's methodology. Subsequently, section three outlines the theoretical framework on global governance, regulatory sovereignty, and international trade, with a focus on the North-South dynamic. The fourth section analyzes the potential impacts of the EUDR on international trade relations and sustainability, as well as its adherence to the Paris Agreement. Given the limitation of concrete data available, quantitative and qualitative indicators are presented to evaluate its effects on the agri-food chains (soybeans, beef, cocoa, and coffee), also considering the challenges to regulatory sovereignty and inequalities among global actors. The conclusion addresses suggestions for public policies and environmental diplomacy, in addition to outlining pathways for future research.

2. Methodology

This research adopts a qualitative approach to critically and multidisciplinary analyze the impacts of the European Union Deforestation-Free Regulation (EUDR) on the Brazilian agri-food system. The article is configured as a case study, which delves into the effects of the EUDR on Brazil's regulatory sovereignty and competitiveness.

This methodological choice is justified by the complexity of the topic, which covers legal, political, economic, and commercial aspects, demanding a contextualized and in-depth analysis of the phenomena. The investigation, structured through a protocol of qualitative document analysis (Bowen, 2009), utilized a corpus of primary and secondary sources. This includes EU legislation (e.g., REGULATION (EU) 2023/1115), official communications from the Brazilian Ministry of Foreign Affairs (e.g., BRASIL, 2025), and specialized academic literature focused on EUDR and agri-food impacts, with priority given to recent publications from 2022 to 2025.

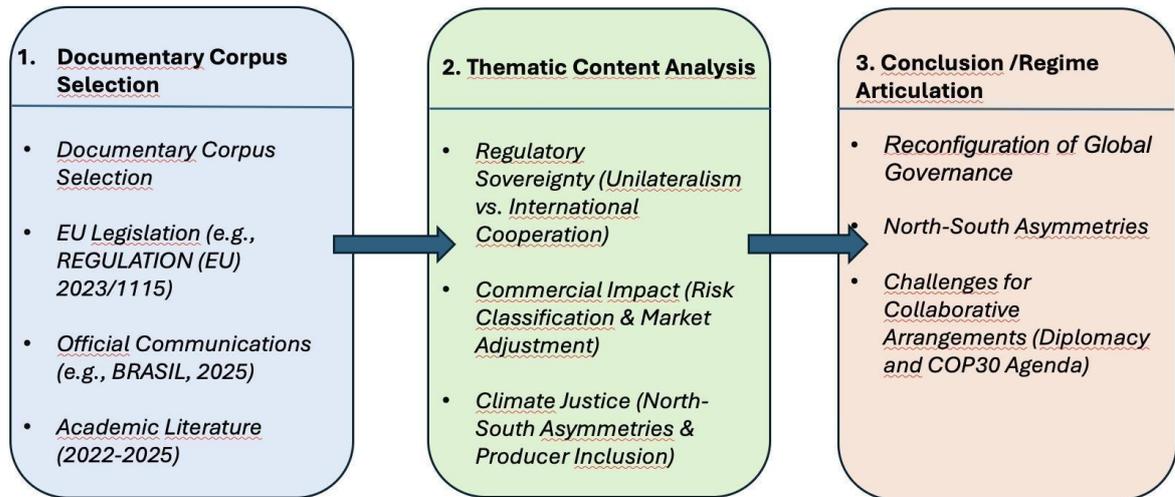
The data analysis employed a thematic content approach, focusing on three dimensions: regulatory sovereignty (unilateralism vs. international cooperation), commercial impact (risk classification and market adjustment), and climate justice (North-South asymmetries and producer inclusion).

Issues of financing and financial inclusion, fundamental for the Sustainable Development Goals (FAO, 2024), still face structural obstacles that affect the adaptation of Brazilian exporters to the EUDR's requirements. By analyzing these multiple dimensions, the research contributes to the debate on global governance, trade justice, and the transformations in Brazil-European Union relations.

Additionally, this research adopts a critical and multidisciplinary analytical perspective. The analysis transcends the mere description of impacts to examine the power dynamics underlying the EUDR regulation. For this purpose, the study is based on concepts such as climate justice and North-South asymmetries, exploring how the EUDR, despite its environmental objectives, can reconfigure global value chains to the detriment of exporting countries like Brazil.

Figure 1 illustrates the three analytical stages of the research: i) selection of the documentary corpus; ii) thematic content analysis, and iii) discussion of the Global Governance–Sovereignty–Climate Justice nexus.

Figure 1 – Analytical Stages of the Qualitative Document Analysis of the EUDR



2. Global Governance and the EUDR

Initially centered on multilateral agreements between nation-states, global governance has evolved to incorporate a series of new actors and processes. In this sense, environmental politics has emerged as a fertile ground for the study of transnational governance, a key concept for understanding regulations like the EUDR. As Hale (2020) argues, it transcends the actions of governments and intergovernmental bodies, driven by subnational and non-state actors, such as activist networks, companies, and NGOs, who establish links and act politically across national borders. The author defines this governance as the processes by which non-state actors adopt rules to achieve public goals.

The global governance of food security became a central issue after the food crises of 2007-2008, which revealed institutional limitations and motivated reforms, such as the restructuring of the Committee on World Food Security (CFS), which sought more participatory decision-making processes (CANDEL; BIESBROEK, 2018; McKEON, 2015).

Organizations such as the United Nations Food and Agriculture Organization (FAO), the Committee on World Food Security (CFS), and the World Food Programme (WFP) mediate national interests and global demands for food security, promoting a more plural and dynamic governance (McKEON, 2015). The growing complexity of the topic requires multi-sectoral coordination (CANDEL; BIESBROEK, 2018).

The contemporary debate addresses normative fragmentation and conflicts between regulatory frameworks. Margulis (2013) highlights that divergent norms in the regimes of agriculture, trade, and human rights generate political conflicts, hindering cohesive food policies, especially in developing countries. The presence of private interests and corporate capture can compromise the effectiveness and justice of governance, reinforcing the debate on alternatives such as food justice and agroecology (McKEON, 2015; DONNADELLI; FRAUNDORFER, 2016). Points of intersection between food security and climate change policies are also observed.

In a similar context, Keohane and Victor (2011) argue that the area of climate change is governed by a "regime complex," not a single comprehensive system. This means that, instead of a centralized hierarchy, global governance is a set of institutions and agreements that coexist, often in parallel or in competition. This reality is a direct result of the ineffectiveness of traditional multilateral regimes. For example, the Kyoto Protocol, despite its nearly universal membership, had a "limited, shallow, and ultimately symbolic" effect, as it imposed no obligations on developing countries and was not ratified by key nations like the United States (Keohane and Victor, 2011).

Therefore, it can be said that the European Union Deforestation-Free Regulation (EUDR), even being a public and state measure, fits into the logic of transnational governance. By imposing due diligence and traceability standards on European importers, the EUDR exerts direct influence over the conduct of non-state actors (such as producers, companies, and cooperatives) in Brazil and other exporting countries.

The EUDR is, therefore, an exemplary case study of how environmental governance tools manifest today, operating in parallel or even overlapping with traditional multilateral regimes. Global environmental governance, although with historical roots, has expanded into a complex and multifaceted system with the participation of diverse actors. Hale (2020) describes this evolution:

The 1972 Stockholm Earth Conference (the environmental Bretton Woods) marked the emergence of what has become a large and complex set of environmental regimes. Today, more than 1,300 multilateral environmental agreements govern all aspects of the natural world (Mitchell 2018). Alongside them, a host of transnational actors, networks, and governance institutions have emerged to form a critical part of global environmental governance. (Hale, 2020, p. 204)

The EUDR is an ambitious transnational environmental regulation, integrated into the European Green Deal and the EU's climate policy, designed to mitigate deforestation and its emissions (EUROPEAN COMMISSION, 2024; MOTAR FISHER et al., 2024). Its extraterritorial nature imposes obligations on operators and exporters in third countries that access the European market (GARCIA, 2025; SCOTT, 2014). In addition to technical requirements, the EUDR raises a fundamental debate about regulatory sovereignty and trade justice. From a critical perspective, this kind of regulation can be seen as a manifestation of power that deepens historical inequalities (SANTOS, 2007b).

Latin American governments, including Brazil, argue that the extraterritorial scope of the regulation constitutes a unilateral trade barrier that imposes a "one-size-fits-all" standard, ignoring local realities and disproportionately burdening small producers. This unilateral approach, which may not be effective in reducing deforestation, is perceived as a threat to Brazil's autonomy in its own environmental and commercial policies (Moura, 2025). The risk of green protectionism is evident, as the categorization of "zero risk" for some countries benefits EU producers, creating a competitive disparity (Moura, 2025).

The EUDR is complemented by the European Corporate Sustainability Due Diligence Directive, reinforcing the "Brussels Effect," where the EU projects its standards globally, impacting supply chains in Brazil (TREVIZAN; MENDES, 2025; BRADFORD, 2020; GARCIA, 2025). The regulation requires due diligence and traceability to prove legal origin and no link with deforestation (REGULATION (EU) 2023/1115; MOTAR FISHER et al., 2024).

In Brazil, exporters of soybeans, beef, and leather are already testing traceability systems to comply with the EUDR, with geolocated data collection and compliance analysis (PROFOREST, 2025). Although there have been advances, challenges persist in adapting the systems, especially for small producers. The requirement for detailed geolocation and risk classification integrates a new regulatory paradigm for international commodity trade (MOTAR FISHER et al., 2024; MARGULIS, 2013). Garcia (2025) observes that extraterritoriality forces operators to adapt processes outside the EU, under penalty of exclusion.

The "Brussels Effect" can generate positive externalities, inducing traceability and auditing in Brazilian agribusiness, but also aggravate vulnerabilities (TREVIZAN;

MENDES, 2025). The EUDR reinforces the EU's "normative power," imposing extraterritorial environmental standards as a foreign policy strategy (MOTAR FISHER et al., 2024; MARGULIS, 2013; GARCIA, 2025; EUROPEAN UNION, 2016).

Its implementation generates debates about regulatory justice and asymmetric impacts. Despite advances in transparency, the EUDR can exacerbate inequalities and exclude small producers due to high compliance costs (MOTAR FISHER et al., 2024). Inconsistencies in monitoring methods (PROFOREST, 2025) require dialogue. Strands of the literature point to a disconnect between European and extra-community norms, generating trade distortions (GARCIA, 2025; BRADFORD, 2020).

The global institutional fragmentation makes coordination and coherence in responding to crises difficult (MARGULIS, 2013). The EUDR, inserted in this regime complex, demands normative alignment and strengthening of the administrative capacity of the Global South to avoid negative effects, such as the transfer of commodities to less stringent markets (MOTAR FISHER et al., 2024).

4. Impacts and Challenges of the EUDR for the Brazilian Agri-Food System and for Climate Actions

4.1. Sectoral Impacts and Compliance Challenges

Economic and commercial effects of the EUDR vary among strategic sectors of Brazilian agribusiness. A comparative analysis of the sectors, carried out by Cesar de Oliveira et al. (2024), through a "Compliance Likelihood Index" (CLI), reveals significant differences and specific challenges for each commodity.

Coffee has the highest compliance index (0.89). It is associated with the lowest deforestation risk (only 0.1%), and the EU market accounts for 49.8 % of Brazil's coffee export. Therefore, the sector has high incentives to comply with the EU requirements. In addition, remote sensing systems and digital tracking platforms under implementation already cover approximately 94% of producers that export coffee to the EU (COLUSSI et al., 2024)

Soy also shows high compliance potential as a large share of Brazilian production is exported (68%), and 15% of this total is directed to the EU. The sector is mostly comprised of large producers, which have greater capacity to bear the costs of implementing the traceability requirements set by the EUDR. This combination of

variables resulted in the second-highest probability of compliance in the index (0.64) in the study. Paradoxically, the exclusion of the Cerrado, which accounts for over 60% of Brazil’s soybean output, undermines the environmental coherence of the EUDR, revealing inconsistencies between its stated goals and territorial application (COLUSSI et al., 2024).

On the other hand, the beef sector has the lowest compliance index (0.3), suggesting that the transition to deforestation-free supply chains is the most challenging. According to Cesar de Oliveira et al. (2024), this is due to very low market incentives (the EU/UK represents only 8.26% of Brazil’s exports in 2021) and the fact that cattle is responsible for a large percentage of absolute deforestation in Brazil (61.2% between 2005 and 2018). Cocoa also has a low probability of compliance (the second lowest index), with similarly low market incentives, as the EU/UK are not the main importers of the commodity (4.48% in 2021).

Table 1 – Levels of Compliance and Sectoral Challenges for the EUDR

Commodity/ Sector	Compliance Likelihood Index (CLI)	Key Challenges	Opportunities/Observations
Coffee	0.89 (Highest)	Low challenges. High traceability coverage of exporters to the EU by existing digital tracking platforms (94%).	Lowest deforestation risk (0.1%); Strong potential for <i>compliant</i> status.
Soybeans	0.64 (Second Highest)	Exclusion of the Cerrado biome (60% of output); High costs for small producers.	Large producers capable of absorbing compliance costs.
Beef	0.3 (Lowest)	Low market incentives (EU/UK = 8.26% of exports); High historical deforestation link (61.2% of deforestation).	Requires major structural transition and robust traceability systems.
Cocoa	Low (Second Lowest)	Low market incentives (EU/UK = 4.48% of exports); Prevalence of small producers (hinders traceability).	Requires technical and financial support for smallholder inclusion.

Source: Adapted from Cesar de Oliveira et al. (2024) and Colussi et al. (2024).

The research findings indicate that while sectors such as coffee already demonstrate low risks and high coverage of sustainability standards, others, such as beef, will face strong structural challenges. The study also reinforces that the prevalence of small producers, in sectors like cocoa and coffee, represents an obstacle to compliance, considering the need for technical and financial resources to implement traceability. The adoption of criteria that disregard the existent diversity of producers in Brazil can result in unnecessary collective punishment, as small and medium producers can be affected by generalized restrictions and barriers even if they are not linked to deforestation (COLUSSI et al., 2024).

4.2. Regulatory Sovereignty and Trade Justice Implications

According to Trevizan (2024), the implementation of the EUDR will bring challenges and opportunities for Brazil, requiring productive sectors to adapt to European requirements through the strengthening of forest certifications, the fulfillment of due diligence procedures, and the use of monitoring technologies, such as georeferencing and satellite tracking systems. The active participation of the Brazilian State is pointed out as crucial to guarantee the effectiveness of these instruments, facilitating coordination among government, producers, and international partners. Furthermore, the need for the development of a more structured international forest regime reinforces the relevance of Brazil-EU diplomatic engagement for building collaborative policies that preserve the country's competitiveness in global trade.

The reaction, engagement, and actions of non-state actors, although growing and influential in environmental governance, are significantly shaped by the national context in which they are inserted and by local policies. Therefore, the scope, effectiveness, and practical impact of transnational governance are largely determined by the "shadow of the state", which influences the most entrepreneurial forms of authority and regulation (Hale, 2020).

To date, the response of the Brazilian government has been both reactive and proactive. The pressure from the European regulation pushes the country to adapt its productive sectors, with the adoption of advanced tracking and geolocation technologies.

However, Brazilian diplomacy argues that the success of the regulation will depend on its capacity to harmonize environmental commitments with fair trade practices, ensuring that sustainability efforts do not inadvertently create new economic disparities

(Moura, 2025). Cooperating with the EU, pointed out as essential for Brazil, is a way to align practices and preserve competitiveness, instead of simply accepting an imposition. Accordingly, the State's action becomes crucial to mediate this new dynamic (Trevizan, 2024).

Furthermore, the implications of the EUDR for Brazilian agribusiness can be better understood by analyzing its country classification system. The regulation establishes a risk classification system that categorizes countries and regions based on their level of deforestation risk: low, standard, or high. In this context, the Brazilian government received with concern the country's classification in the "standard risk" category (BRASIL, 2025).

The Ministry of Foreign Affairs (MRE) released a note that reiterates its critical stance regarding the legislation, arguing that the EUDR is a "unilateral and discriminatory" measure that disregards national efforts for forest preservation. The Ministry outlines its "strangeness" that most countries with large areas of tropical forest were classified with a higher risk than countries that practice temperate climate agriculture (BRASIL, 2025).

In response to pressures from various countries and organizations, the application of the EUDR was postponed by 12 months, with the new effective date set for December 30, 2025, for large and medium-sized companies, and June 30, 2026, for small and micro-enterprises (EY Tax News, 2025).

The original timeline represented a "significant challenge for many companies," which led the European Commission to propose the postponement to allow more time for preparation (EY Tax News, 2025). However, the implementation of the EUDR has been marked by continuous uncertainty. The European Commission itself expressed concerns about the readiness of the information technology system that underpins the law, warning of the risk of "repeated and long-lasting disruptions" that could paralyze the application of the regulation (Preferred by Nature, 2025).

According to Jack Hurd (2025), "Deforestation policy can encourage agricultural adaptation," as government policy has the potential to "help farmers and the agricultural sector adapt to greener practices, free of deforestation, much like a 'just transition'." The author reinforces that the postponement can be an opportunity to "assess early progress,

refine the tools and build the capacity needed" for successful implementation, which could mitigate the risks of market segmentation and the exclusion of small producers.

5. Conclusion

The impacts of the EUDR on Brazil are multiple, diverse, and interdependent. The regulation not only redefines market access criteria but also reconfigures power relations in supply chains, pressures the Brazilian State's regulatory capacity, and the ability of producers to adapt to the requirements. By projecting unilateral norms of international reach, the EUDR needs to be inserted into the debate on sovereignty, regulatory justice, and the limits of global environmental governance.

This analysis of the EUDR shows that, although it has clear environmental objectives, the regulation reinforces the normative power of the European Union and poses challenges to Brazil's sovereignty. Traceability and due diligence requirements increase costs and can exclude small producers, evidencing inequalities in agri-food global value chains. Sectors like coffee and soy could adapt more easily, while beef and wood face complex barriers, reflecting the productive diversity of Brazil. Thus, the EUDR redefines power relations, demanding greater articulation among the State, producers, and international partners.

This research also highlights that Brazil needs to transform this agenda into a strategic opportunity. The United Nations Climate Change Conference (COP30), to be held in Belém, Pará, emerges as an ideal stage for the country to lead the discussion on models of cooperation, incentives for green transition pathways, and the protagonism of small producers, among other issues.

Brazilian diplomacy should advance institutional models of South–North dialogue grounded in technical cooperation, capacity-building funds for smallholders, and joint verification mechanisms co-managed with EU agencies. This strategic positioning implies advocating not only for fair trade but also for the institutionalization of mechanisms that specifically address North-South asymmetries, such as bilateral green certification agreements and targeted financing instruments to reduce traceability costs, which are disproportionately borne by small and medium-sized producers.

The environmental conferences and climate weeks, furthermore, which take place annually, can become platforms for improving EU's active listening of partner countries'

viewpoints. Through this enhanced dialogue, the EU could increase the alignment of EUDR's requirements with the needs of upstream actors in the chain.

Effectively addressing the complexities of the EUDR and advancing the COP30 agenda requires transcending traditional state action through multilateral partnerships: private sector innovation, governmental support, international agency resources, and academic knowledge production must converge to foster and implement sustainable, non-exploitative production models. This synergy is essential for a robust global investment in climate mitigation and adaptation, while prioritizing the urgent green transition and productive adaptation needs of the Global South.

This study, although limited to the Brazil-EU trade relationship, contributes to broader debates on regulatory justice, coloniality, and global governance, highlighting the North-South tensions in the international environmental agenda. The analysis emphasizes the importance of strengthening Brazil's regulatory capacity and environmental diplomacy, balancing sustainability and competitiveness. Future research could further explore the social, economic, and environmental effects of the EUDR, as well as inclusion mechanisms for Global South producers.

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