

28th July 2026 – Open Letter

Subject: Request for a public position on the exclusion of leather from the EU Deforestation Regulation (EUDR)

Dear [FASHION GROUP NAME],

LAV, Humane World for Animals and Collective Fashion Justice are writing to you regarding a regulatory decision that directly concerns your Group's supply chain.

On 13 July 2026, the European Commission adopted a **delegated regulation** excluding cattle hides, raw skins and leather from the scope of the EU Deforestation Regulation (EUDR). This decision was taken despite the Commission's own **Staff Working Document** (SWD(2026) 194 final) estimating that keeping leather within the scope of the regulation would generate environmental benefits of between €979 million and nearly €2 billion per year, against recurring compliance costs for operators of just €16.7 million per year.

This choice creates a clear inconsistency: the meat of cattle raised on deforested land remains banned from the EU market, while the hide of the same animal can continue to circulate freely, with no traceability or due diligence obligations.

A recent peer-reviewed scientific study published in ACS Sustainable Chemistry & Engineering ([Roncevich, Hayek & Hinestroza, 2026](#)) confirms the severity of this inconsistency on scientific grounds: applying a new allocation method based on FAO data, which overcomes the limitations of previous life-cycle analyses, the authors estimate a carbon equivalent footprint for bovine leather of 187.1 kg CO₂eq per kg of finished leather — more than double previous estimates and over 12 times higher than that of non-animal alternatives (14.9 kg CO₂eq/kg). This change is due to a more accurate economic allocation of co-products. A summary of the findings is also available [here](#).

The delegated act is now subject to scrutiny by the European Parliament and the Council of the EU, both of which have the power to object within an indicative deadline of 13 September 2026.

We are writing to you because your Group publicly claims, in its sustainability reports and through its membership of international coalitions dedicated to the 2030 Sustainable Development Goals, a concrete commitment to supply chain transparency and environmental protection. We believe these commitments should translate into a public position on a regulation that directly affects the traceability of raw materials used in your collections.

We therefore ask you to indicate your Group's position on the following two points, simply by marking one option for each:

1. Does your Group support keeping leather within the scope of the EUDR?

- ☐ **IN FAVOUR** of keeping leather within the EUDR
- ☐ **AGAINST** keeping leather within the EUDR / no position

2. **Does your Group intend to urge the European Parliament and the Council of the EU to oppose the delegated act excluding leather?**

- ☐ **YES**, the Group commits to urging the EU institutions
- ☐ **NO** / no position

A brief response following the format above is sufficient. Any additional information your Group wishes to provide in support of its position is of course welcome. We will use this information in our political lobbying to ensure that Europe's fashion industry shifts beyond deforestation-sourced leather.

We would be grateful for a response **by 1 September 2026**, in good time ahead of the 13 September deadline for institutional scrutiny.

Yours sincerely,

Simone Pavesi
Animal Free Fashion Unit | LAV



Emma Håkansson
Founder | CFJ



PJ Smith
Director Fashion Policy | HWA



For further information:

- Staff Working Doc (see section 3.2.5 "Hides, skins and leather of cattle" (pages 17-19) and in the summary table in Figure 17 (page 24) <https://data.consilium.europa.eu/doc/document/ST-11910-2026-INIT/en/pdf>
- Delegated act (see Whereas 5) https://environment.ec.europa.eu/document/download/e91cf5f7-5e51-4d0f-b1f9-c9d852944d11_en?filename=Delegated+Regulation+on+EUDR+list+of+relevant+commodities+and+products_0.pdf