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UKRAINIAN SOYBEAN GROWERS’ CONCERNS REGARDING THE PROPOSED HIGH-ILUC RISK CLASSIFICATION

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Subject: Strong Concern Over the Draft Delegated Regulation Amending Regulation (EU) 2019/807 and the Proposed Classification of Soybeans as a High ILUC-Risk Feedstock

The Ukrainian soybean growers as represented by the [Ukrainian Agribusiness Club \(UCAB\)](#) express **profound concern regarding the European Commission’s draft delegated regulation (2026/2680)** to amend Delegated Regulation (EU) 2019/807. This proposal aims to classify soybeans as a high-risk feedstock for **indirect land-use change (ILUC)** within the framework of the EU Renewable Energy Directive (RED).

2. Impairment of EU market access and administrative burdens for Ukrainian soybean growers

If entered into force, this delegated act will **seriously impair EU market access** for soybeans grown in Ukraine. The classification of soy as high ILUC-risk necessitates a complex "low-iLUC" certification for crops to remain eligible for the biofuels market. The resulting certification requirements for documenting baseline practices and justifying specific investments create an **unrealistic administrative and financial burden** for Ukrainian growers and processors. **As soybean oil production is an integral part of the soybean supply chain, the impact of increased certification requirements will inevitably undermine local economics of growing and processing of soybeans and ultimately reduce the availability of soymeals, one of the key proteins.**

3. Ukraine’s Vital Role in European Protein Security

Ukraine remains the **largest European producer of soybeans**, with the 2025 production volumes expected at the level of 5.6-5.7 million tons to be harvested from 2.2-2.25 million hectares. This production is essential for satisfying a significant share of the European Union’s demand for soya-based plant protein products.

The **EU processes approximately 15 million tonnes of soybeans annually**. Furthermore, the EU currently relies on imports for roughly **20 million tonnes of soybean meal** every

year. In 2025 the EU accounted for 43% of total Ukraine's soya vegetable oil exports, [while Ukraine's share in the EU imports of soya bean oil increased to 66% as compared with 2021.](#) As Ukraine has been classified as a low-risk country under the EU Deforestation Regulation, Ukraine's 6-million-ton harvest should be regarded as a cornerstone of the EU strategic autonomy, providing a traceable, non-GM, and deforestation-free alternative to imports from high-risk regions.

4. Importance of EU Export Revenues for Ukrainian agriculture

Revenues generated from soybean exports to the EU constitute a **critical share of global export revenues** for the Ukrainian soybean sector. Because alternative food and industrial markets are limited in volume and vulnerable to war-related volatilities in logistics, they cannot absorb the quantities currently directed toward the European biofuel sector. A loss of this market would lead to a sharp decline in demand for Ukrainian-grown soybeans, weakening the economic resilience of the Ukrainian agricultural sector.

5. Policy Incoherence and Double Administrative Burden

The Ukrainian soybean sector echoes the views of EU stakeholders who contend that this draft delegated act **has limited coherence with several key EU policy objectives**:

- **EU Vision for Agriculture and Food:** The act threatens the strategic goal of strengthening investment in European soybean breeding and production.
- **Upcoming EU Protein Plan:** While the Commission prioritizes domestic protein production and strategic autonomy, this regulation creates a barrier that disincentivizes regional cultivation.
- **Overlap with the EU Deforestation Regulation (EUDR):** Ukrainian soybeans are already subject to strict traceability and deforestation-free requirements under the EUDR. Classifying them as high-risk under the ILUC methodology creates an **unnecessary double administrative burden** that undermines origin-based differentiation.

6. Call for Action

The Ukrainian soybean sector **strongly urges the EU Council and the European Parliament to object to the draft delegated act** within the official scrutiny period, which is set to expire in early August. The objections will be key to prevent the enactment of a regulation that would dismantle the foundations of a sustainable, European protein supply and deal the Ukrainian soybeans sector a serious economic blow.

In this regard the sector is encouraged by the positive signals expressed by a majority of the EU Member States on the subject during the EU Agriculture and Fisheries Council on May 26, 2026 and urges the European Commission to take them on board.

As an acceding candidate country Ukraine should be treated as a European soya supplier in any forthcoming EU policy initiatives related to the status of soya

vegetable oil as a feedstock for sustainable bio-fuels under the EU Renewable Energy Directive.

For further questions, please contact Nazar Bobitski, UCAB EU Office Director

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