

# Progress towards the Goal of the UK Soy Manifesto – July 2025

The UK Soy Manifesto launched in 2021 with a goal to ensure all physical shipments of soy to the UK are verified deforestation and conversion-free (vDCF) by the end of 2025. It has grown from 27 founding Signatories to 50 Signatories, representing over 60% of UK soy consumption, with 11 supporting feed and livestock trade associations.

**Despite the efforts and progress made during the last 4 years we do not believe that it will be possible to achieve the Goal by the end of 2025.**

**This update outlines the progress to date, the challenges that companies have faced in preparation for achieving 2025 targets for vDCF soy, and the next steps and planned actions to support delivery of the Goal.**

## Summary

### Progress to date

- In 2024, 98% of Signatories had public vDCF policies in place benchmarked to industry best practice, with 76% publishing detailed action plans. The majority (88%) of Signatories were reporting on progress and of those, 60% had disclosed vDCF soy volumes.
- Just under half of Signatories were able to report on the number of in-scope suppliers with an aligned vDCF commitment, and the proportion of their soy footprint this represents, with challenges remaining in more complex and less integrated supply chains. Over half of Signatories had expanded their commitment beyond their UK operations.
- Since 2017, there has been a substantial increase in the visibility (e.g. origin, certification status) of UK sourced soy, from 84% 'unknown' in 2017 to 26% 'unknown' in 2023. Over this same period there has been a huge increase in the purchase of certified soy 'in transition' to vDCF, rising from 10% in 2017 to 46% in 2023. In 2023, UKSM Signatories covered 61% of soy volumes (>1 million tonnes) with certified soy. Notwithstanding this, the proportion of verified deforestation and conversion free soy reported by Signatories remains small, at less than 10%.
- Collaboration with the UK Feed Industry (AIC and shippers ADM, Cargill, Cefetra, Viterro) has led to the development of a new 'EUDR-aligned' soy standard (equivalent to vDF), set to be in place by the end of 2025, with an additional conversion-free soy module committed to for early 2026. A vDCF Publicly Available Standard (PAS) is also under discussion.
- Whilst these Standards will not be fully operational by the end of 2025, the development of a credible DCF standard for the UK market will provide Signatories with a mechanism to request and verify DF and DCF soy in their supply chains soy (for >60% of UK soy) helping to drive mass market change for the UK market.
- On embedded soy, progress has been made through the Embedded Soy Working Group on mapping out pathways for vDCF for imported embedded soy, with a focus on farmed seafood and poultry produced in Thailand.

## Challenges in achieving the UK Soy Manifesto commitment

- The standards in development through AIC and/or BSI, will provide the mechanism for UK businesses to make and cascade a clear request for deforestation and conversion free soy, a key objective of the Manifesto. These will not, however, be available in time to meet the end of 2025 Goal and their availability does not in itself guarantee availability or supply of vDCF soy for the UK market. Critical dependencies will be implementation of the EUDR moving the rest of the market to vDF, full delivery of the AIC/BSI standards in the UK, and agreement within supply chains on how any additional costs will be shared across supply chains actors.
- Delays in the EUDR, uncertainty on UK FRC regulation, and broader geopolitical instability and trade volatility have hampered the ability of the UK Soy Manifesto to make progress at the speed we had hoped. Shipper and European market focus on EUDR compliance has also made discussions on conversion (not within scope of the EUDR) more difficult.
- Notwithstanding these challenges, whilst the proportion of verified deforestation and conversion free soy at point of UK import remains small, the successful implementation of the requirements of EUDR as they are currently set out, from 1<sup>st</sup> January 2026, will see a radical shift towards physically verifiable deforestation free soy supply chains from origin to Europe/UK. This will support progress towards the UK Soy Manifesto goal and should also enable greater visibility of the conversion free status of these EUDR compliant supply chains.
- Inconsistent reporting and transparency of the vDCF status of UK soy imports has been a key challenge and a missed opportunity to communicate the progress already made. Commitments made by the feed industry and shippers to maintain future reporting of UK imports are welcomed.
- Influencing supply chains of soy fed to livestock/aquaculture reared outside the UK in markets where our influence is smaller, adds complexity and challenge, though progress has been made.
- Challenges in gathering feed data in the more complex supply chains remain.

## Next steps needed to enable delivery and plans for 2026

Signatories remain committed to the Goal of the UK Soy Manifesto. The next priority steps and actions required to enable delivery of the Goal are as follows:

**Implementation of the EUDR:** To deliver physical verified DF soy to Europe, and to the UK on request, and enable greater visibility of the conversion free status of these supply chains to support vDCF commitments in the UK.

**Delivery and roll out of vDCF standards.** We will work with AIC to ensure these Standards (and the vDCF BSI PAS if this route is pursued) are delivered, operationalised, and available to be specified in contracts from 2026 for Signatories to roll out to their whole supply chains.

**Clarity on UK regulation on forest risk commodities:** To provide certainty for UK businesses as they make further investments in vDCF soy in their supply chains in the next 12-18 months.

**Shippers to meet their own DCF targets:** To ensure they can demonstrate that their own, individual supply chains, are verified as deforestation and conversion free, supporting the Goal of the UK Soy Manifesto.

**Continued work on embedded soy:** To develop and refine vDCF roadmaps toward full alignment with the UK Soy Manifesto Goal for key geographies and products, with a focus on poultry from Thailand, and farmed seafood.

**Strengthened alignment on conversion free soy across Europe:** To present a stronger, larger collective market signal and a level playing field for UK businesses.

**Complete the development of a credible, transparent MRV system for UK soy:** Building on the work done to date, work with AIC and the shippers to reinstate and maintain quarterly reporting on national UK soy imports and establish a method to monitor volumes from farm inputs through to manufacturing.

**We recognise that the UK Soy Manifesto is only one part of a broader set of actions that are needed to support sustainable soy production globally, through private sector supply chains, government action and support from civil society.**

## Detailed Report

- i. [Introduction](#)
- ii. [Progress to date](#)
  - a. [Signatory progress against UK Soy Manifesto commitments](#)
  - b. [Signatory Progress on the UKSM Goal - 100% vDCF by end of 2025 latest](#)
  - c. [Signatory progress to support a market move to vDCF](#)
- iii. [Challenges in achieving the UK Soy Manifesto Goal](#)
- iv. [Next steps and planned actions to enable delivery of the Goal](#)
- v. [Annex](#)

## Introduction

2025 marks a pivotal year for the UK Soy Manifesto. In November 2021, a group of 27 companies made a collective industry commitment to work towards a shared goal:

*“to ensure all physical shipments of soy to the UK are deforestation and conversion-free (cut-off date of 2020 at the latest), fully implemented immediately where possible and no later than the end of 2025”.<sup>1</sup>*

The Goal includes direct soy (soybeans, soybean meal and soy hulls) landed in the UK, but also embedded soy (e.g., in imports of meat, dairy, and seafood products), and soy used for human consumption directly.

Today, this group has grown to 50 signatories and 11 supporting organisations. Representing an estimated 60+% of UK soy consumption, this includes producers from meat, dairy, and aquaculture, manufacturers, processors, consumer facing grocery retailers, and food service restaurants. The UK Soy Manifesto works with key organisations including AIC, the major UK shippers, and livestock and farmer associations (e.g. NPA, BCA, Dairy UK, NFU).

This update outlines the progress to date, remaining challenges, next steps and planned actions to enable delivery of the Goal.

---

<sup>1</sup> The Manifesto aligns with definitions of deforestation and conversion free soy derived from the [Accountability Framework](#): **Deforestation**: Loss of natural forest as a result of: (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained degradation. **Conversion**: Loss of a natural ecosystem as a result of its replacement with agriculture or another land use, or due to a profound and sustained change in a natural ecosystem’s species composition, structure, or function.

## Progress to date

### Signatory progress against UK Soy Manifesto commitments

To support the transition to 100% vDCF supply chains, Signatories made five commitments through UK Soy Manifesto membership.

Full details of Signatory progress can be found in the [2024 Annual Public Report](#).

**Commitment 1:** Set a deforestation and conversion-free commitment with a cut-off date of 2020 or earlier.

- *Progress: 98% of Signatories had a public vDCF policy in place. The vast majority adhere to best practices, with 87% referencing a 2020 cut-off date, 89% addressing embedded soy where applicable, and most including verification methods and key AFI definitions.*

**Commitment 2:** Ask direct suppliers to adopt and cascade the same commitment.

- *Progress: 76% of Signatories have developed action plans setting out how they will deliver on their public commitment, including supplier engagement on vDCF soy and acceptable evidence. Many continue to purchase certified soy, contributing to sustainable soy production even if this cannot be linked to the soy that physically flows into their individual supply chain (see Figure 2 below). Additionally, more Signatories are expanding commitments beyond UK operations, 30 are applying these commitments to their whole operations, whilst 4 are transitioning towards this goal.*

**Commitment 3:** Integrate Manifesto commitments within direct supplier commercial contractual requirements and support compliance.

- *Progress: Manifesto Signatories committed to cascade their commitment across their supply base and support compliance. We are not able to report on the proportion of Signatories that have made this a contractual requirement, in part because the standards in development through AIC and/or BSI, re intended to provide the mechanism for UK businesses to make and cascade a clear request for deforestation and conversion free soy. Notwithstanding this just under half of Manifesto Signatories were able to report on the number of in-scope suppliers with an aligned vDCF commitment, and what proportion of their soy footprint this represents. Several factors make this more challenging, for example in more complex supply chains (e.g. when soy is embedded within imported products) and where Signatories may have reduced visibility of decision making in animal feed (e.g. in beef/dairy sector).*

**Commitment 4:** Publicly disclose progress.

- *Progress: The majority (88%) of Signatories are reporting on progress against their public commitment to deforestation and conversion-free soy sourcing. Of those reporting, 30 Signatories (60%) have publicly provided the volume or percentage of their total footprint which can be verified as deforestation and conversion-free. A further 11 refer to this commitment although unaccompanied by volume figures, showing progress towards transparency across the sector. Where Signatories have not provided this figure, it is typically where the supply chain is extremely complex and where visibility of feed data,*

although available, is more challenging (with processed dairy products being one example).

**Commitment 5:** Encourage harmonised monitoring, verification, and reporting.

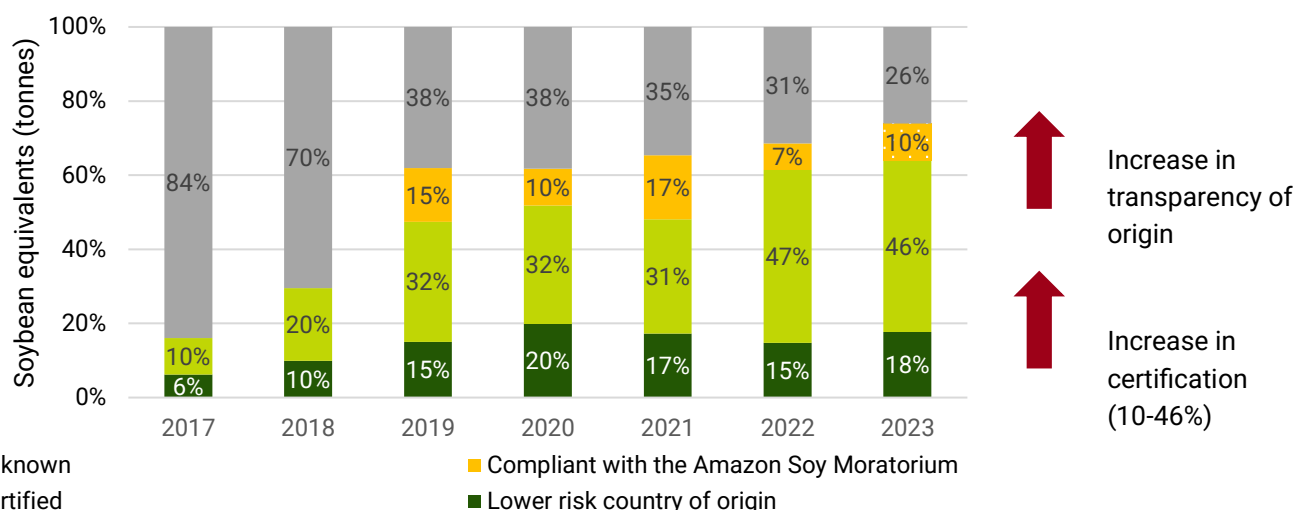
- *Progress: We have made partial progress in developing an MRV system. The development of a standard to verify soy imports was first attempted in 2023 however we were unable to get agreement at the time as the chain of custody proposed was a mass balance one. Whilst we can verify data through the recently developed AIC EUDR-aligned standard, tracking soy from origin farm to feed mill, we lack a system to monitor volumes from UK feed mill and farm inputs through to food manufacturing and further downstream. We currently produce an annual progress report based on Signatory data, but challenges remain, including inconsistent import data reported from the feed industry.*

**Signatory Progress on the UKSM Goal: 100% vDCF by the end of 2025 latest**

Signatories report annually on a breakdown of the sustainability claims for their soy usage/purchase and report these figures to the Secretariat, enabling collective reporting through the UK Soy Manifesto Annual Progress Report (latest 2024).

Given the estimated proportion (60+%) of UK soy consumption represented by Signatories, it is possible to combine this data with data previously collected through the UK Sustainable Commodities Initiative (previously known as the Roundtable for Responsible Soy) to give an estimate from 2017 of the UK market progress towards more sustainable soy. The trends can be seen below:

**Figure 1** shows an estimate of the increase in volumes of soy consumed in the UK which are either sourced from a lower risk country of origin (USA, Canada, or Europe) or which are covered by a credible sustainability standard, over the period of 2017 to 2023 (certification chain of custody models include those where the physical volumes may not be linked to the standard for example credits and, mass balance).



Note: the figure for volumes of soy compliant with the Amazon Soy Moratorium in 2023 is an estimate

Figure 1 Status of UK soy imports (2017-2023)

**Figure 2:** shows for UK Soy Manifesto Signatories only, the breakdown of Signatory purchases of soy by claim for 2023 soy usage/purchases (UK Soy Manifesto APR 2024). The chart shows a high percentage of certified soy (in transition to vDCF).

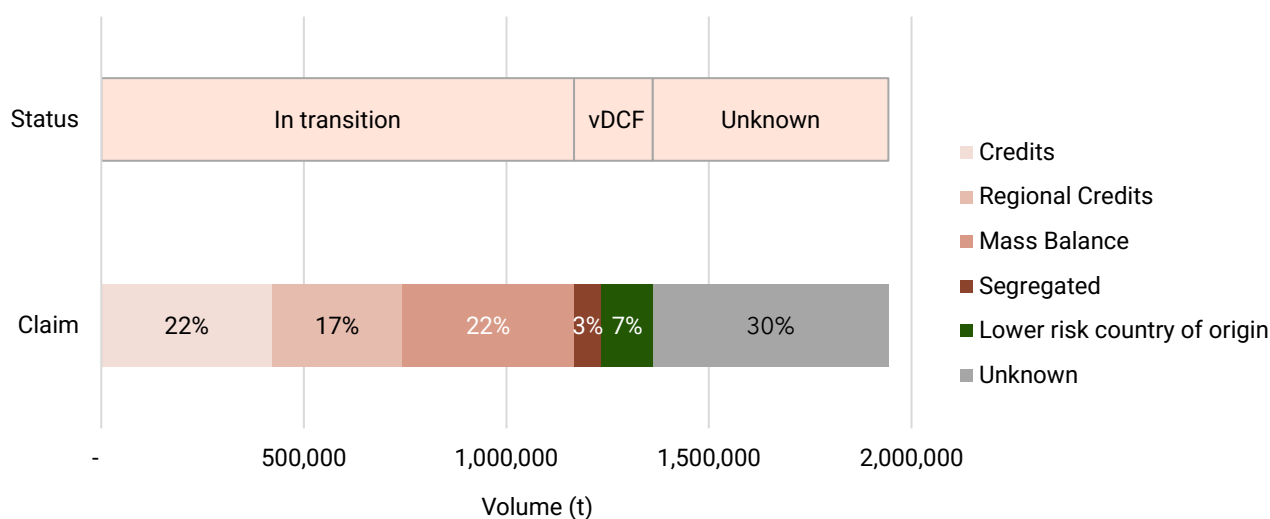


Figure 2

Note: a status of 'unknown' does not indicate soy is contributing to deforestation and conversion, rather that no evidence to prove otherwise can be provided.

**\*Definitions** (see [Annex](#) for full definitions)

- **Verified deforestation and conversion-free:** either certified to a segregated chain of custody model or from a lower risk country of origin (such as Canada, the USA or Europe).
- **In transition:** purchases of certified material that support sustainable soy production, but that do not currently provide chain of custody assurance that vDCF soy has entered the Signatories supply chain so are NOT compliant with the Goal of the UK Soy Manifesto.

#### AIC UK soy imports data (2024 calendar year)

AIC with the support of shippers, committed to public quarterly reporting on the sustainability status of aggregated UK soy imports including the % that is physically verified DCF and from a low-risk origin (as per the definitions above).

Data, received in May 2025, for the calendar year 2024 shows for UK soy imports (soybean meal equivalent):

- 1.4% were physically verified as meeting EUDR requirements as currently understood (legal and deforestation-free) and also conversion-free.
- 19.2% were physically verified as meeting EUDR requirements as currently understood, i.e. legal and deforestation-free.
- 21.8% were physically verified as from a low-risk origin (North America and Europe).

#### Signatory progress to support a market move to vDCF

The UK Soy Manifesto has worked to develop national standards for vDCF soy, and on the development of vDCF plans for embedded soy relating to key products and markets:

## National standards for vDCF soy

The UK Soy Manifesto has worked with AIC to develop an 'EUDR-aligned' (deforestation-free) commodity standard, and additional module on deforestation and conversion-free soy.

The AIC Sustainable Commodities Scheme (ASCS) 'EUDR-aligned module' Standard is designed for participants to demonstrate alignment with the EUDR from origin to UK. This standard aims to ensure, through third party audits, that soy shipments to the UK are physically traceable back to known farms that are verified as legal and deforestation-free in line with EUDR requirements.

→ AIC have confirmed that this will be available in 2025 with mills and shippers certified and ready to supply from early 2026. UK feed producers handling soy must be certified to supply soy to this Standard, enabling farmers to source from certified feed mills, listed on the AIC website.

AIC have agreed, in addition, to develop and publish a 'conversion-free module' to add to the ASCS Standard above, to be published before the end of 2025.

→ AIC have confirmed that this is not likely to be available for UK Soy Manifesto Signatories to contract to before the end of 2025 but they "*recognise Signatories require this as an option to specify for 2026*". They have also made clear that the availability of the Standard does not in itself guarantee availability or supply of vDCF soy for the UK market.

AIC and the four major shippers supplying the UK have said:

- **On DF:** They are preparing to supply EUDR-compliant soy from 1<sup>st</sup> January 2026 for the European market, subject to regulatory timelines, and will be in a position to supply the same to the UK market where required by customers.
- **On vDCF**
  - The geopolitical climate could pose challenges to execution of conversion-free commitments in the UK. However, they will continue to respond to market requirements for vDCF soy where supported by commitments to cover the extra costs associated with vDCF supply chains.
  - They remain committed to meeting their own global commitments to deforestation and conversion-free soy (*note these are broadly aligned around a target date of 1st January 2026 but with cut off dates that do not align with the UK Soy Manifesto - see challenges below*).

The provision of these standards will be an important step towards enabling companies within multi-tier UK supply chains to specify vDCF soy. However, they will not be available in time to meet the Goal of the UK Soy Manifesto and their availability does not in itself guarantee availability or supply of vDCF soy for the UK market as other factors are at play (see below, challenges).

The UK Soy Manifesto continues to evaluate the benefits of a separate BSI vDCF PAS as an alternative/additional mechanism to the AIC Standard and one that could also be adopted for embedded soy.

## Embedded soy

Embedded soy refers to soy fed to animals/farmed seafood (e.g. fish, warm water prawns) where the soy is present in a company's supply chain but no longer physically present in the final products purchased or sold by the company.

An Embedded Soy Working Group (ESWG) was established to identify priority imported products and key geographies, and to work collectively to identify opportunities to support the transition of embedded soy to verified deforestation and conversion-free (vDCF).

The workstreams were split between EU and non-EU (Figure 3).

**EU produced livestock:** In the EU there is an expectation that soy fed to livestock will be EUDR-compliant post-December 2025. Activities have focused on:

- Targeting outreach to key countries of import for the UK including Poland (e.g. poultry) and Spain (e.g. pork), engaging with feed associations to discuss EUDR preparations and understand what efforts there are to go beyond deforestation to conversion. At a feed association and government level, the focus is currently on EUDR and not on conversion which will make progress beyond deforestation challenging in the short term.
- Engaging with other European national soy initiatives on efforts to move these markets to deforestation and conversion-free soy. In Denmark a soy initiative has been established based on the UK Soy Manifesto, with major pork exporters to the UK making similar commitments. This example presents greater opportunities to align on conversion-free soy for embedded products from Denmark.

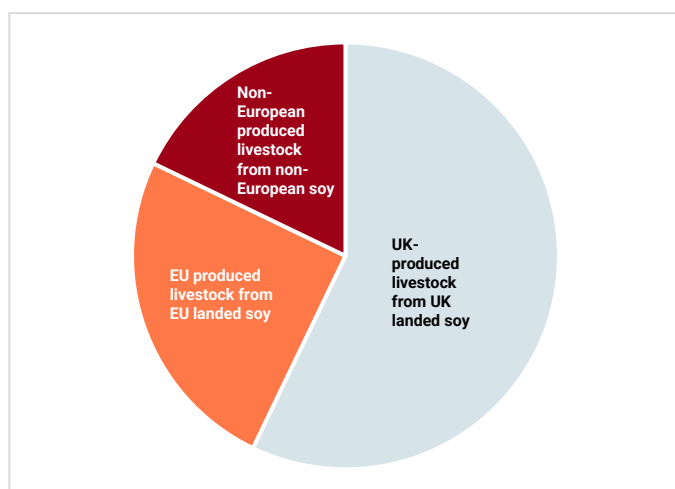


Figure 3 Illustrative UKSM Signatory soy footprint

**Non-EU produced livestock/seafood.** In non-EU supply chains, the following priority products and geographies were identified for priority action (Figure 4).

Product	Europe	Global
Poultry	EU, Poland	Thailand, China & Brazil
Prawns		Vietnam, Central America & Asia
Pork	Spain e.g. Chorizo	
Dairy	Cyprus e.g. Halloumi, EU	

Figure 4 ESWG priority products and geographies



<b>Beef</b>		Argentina & Uruguay
<b>Plant based products including soy ingredients</b>		

### On poultry:

Within the ESWG group and related suppliers, we have embedded soy representation from the supply chain back to source, including retail/food service in the UK, poultry producers in Thailand, the Thai feed industry, and importers/shippers of soy from Brazil and other countries of origin.

**Thailand:** Thailand is a key and growing source of poultry for UK companies. The Group has been exploring the traceability of soy fed to Thai poultry back to its origin farm (e.g. Brazil), how verification can be maintained through to physical soy shipments landed in Thailand, and the practicalities of maintaining verified DCF soy claims through to poultry production. Costed options with timelines are currently being prepared.

In parallel the Group has had two meetings with the Thai Broiler Processing Exporters Association (TBPEA) and Thai Feed Mill Association who are engaged and supportive of developing an action plan on soy to support a sector move. This is a well-integrated supply chain with 80% of chicken products exported to the UK from six TBPEA member companies.

### On aquaculture:

The ESWG has engaged with each of the major global aquaculture certification schemes (ASC, BAP, GAA) to review and explore how their standards can more explicitly support the transition towards a fully deforestation and conversion-free soy supply chain in line with the UK Soy Manifesto Goal.

The review demonstrated that all standards include criteria to address deforestation and conversion-free soy in aquaculture feed and are currently implementing updates which include strengthening criteria on soy sourcing. The ASC Feed Standard has a strong proposition on DCF soy that aligns with the UK Soy Manifesto and requires a documented pathway to DCF. Actions to date include:

- Supporting the successful strengthening of the ASC standard to ensure the cut-off date aligns with the EUDR (Dec 2020).
- Dialogue with the Global Aquaculture Alliance with recommendations for strengthening the standard for warm water prawns as a priority.
- Representation on the Global Gap Compound Feed Manufacturing Focus Group.

### Progress to date – key messages

In 2024, 98% of Signatories had public vDCF policies in place benchmarked to industry best practice, with 76% publishing detailed action plans. The majority (88%) of Signatories were reporting on progress and of those, 60% had disclosed verified vDCF soy volumes.

Just under half of Signatories were able to report on the number of in-scope suppliers with an aligned vDCF commitment, and the proportion of their soy footprint this represents, and over half had expanded their commitment beyond their UK operations.

Since 2017, there has been a substantial increase in the visibility of UK sourced soy (e.g. origin, certification status), from 84% 'unknown' in 2017 to 26% 'unknown' in 2023.

Over this same time there has been a huge increase in the purchase of certified soy 'in transition' to vDCF since 2017 rising from 10% in 2017 to 46% in 2023, with UKSM Signatories in 2023 covering 61% of soy volumes (>1 million tonnes) with certified soy.

The proportion of verified deforestation *and conversion* free soy at point of UK import remains small, the successful implementation of the requirements of EUDR as they are currently set out, from 1st January 2026, will see

- A radical shift to physically verifiable deforestation free soy supply chains from origin to Europe/UK and with this, greater visibility of the conversion free status of these supply chains, and;
- Through the developing vDCF Standards, the ability of the UK market to request and see evidence of deforestation *and conversion* free soy in UK supply chains.

Standards in development will enable Signatories to specify vDF and vDCF in their supply chains but there is a timing issue as these will not be in place and operational to enable 100% compliance by the end of 2025, but should be available in 2026. Their availability does not in itself guarantee availability or supply of vDCF soy for the UK market.

On embedded soy, within non-European embedded soy supply chains we have prioritised poultry supply chains from Thailand and soy in farmed seafood.

- Through the work of the members within the ESWG we now have developing plans for vDCF soy landing in Thailand in 2025/2026 that should enable poultry imports to meet the goal of the UK Soy Manifesto.
- On farmed seafood, we have benchmarked all major standards, confirmed they contain criteria deforestation and conversion free soy in aquaculture feed, and are now engaging these organisations to strengthen these standards over time.

## Challenges in achieving the UK Soy Manifesto Goal

The UK Soy Manifesto has faced a number of challenges to achieving its goal:

### 1. Lack of verification of vDCF status of UK soy imports to source farms

Over the last decade UK businesses have been increasingly purchasing certified sustainable soy (using mass balance or credit supply models), a mechanism that supports soy production on the ground but does not provide assurance on the physical soy arriving in the UK and embedded in products sold in the UK. How we move beyond mass balance evidence, with UK volumes of soy that are very small within global commodity supply chains, was a key blocker that the UK Soy Manifesto aimed to help address.

The implementation of EUDR will help advance this aim by accelerating the move to physical flows of vDF soy to the EU. Shippers have said that they continue to prepare to supply EUDR-compliant soy from 1st January 2026 for the European market, subject to regulatory timelines, and will be able to supply the same to the UK market on request.

Standards to verify *conversion-free* soy, through AIC and/or BSI, should provide the mechanism for UK businesses to request conversion-free soy but they will not be available in time to meet the Goal of the UK Soy Manifesto. Their availability provides the opportunity to specify vDCF soy for the UK market, though are not a guarantee of supply. Shippers have warned that the geopolitical climate could pose challenges to execution of conversion-free commitments in the UK. However, they will continue to respond to market requirements for vDCF soy, where supported by commitments to cover the extra costs associated with vDCF supply chains.

The major shippers supplying the UK have their own global commitments to deforestation and conversion-free soy, broadly aligned around a target date of end of 2025 for key origin geographies such as Argentina and Brazil (see below). Whilst these are broadly in line with the UK Soy Manifesto, all have cut off dates after the UK Soy Manifesto cut-off date of December 2020. In addition, whilst they indicate substantial progress, we know that a vDCF commitment at source does not automatically translate to vDCF soy at point of UK import.

Shippers have said they remain committed to meeting these commitments. If these are delivered upon (based on the progress reported to date), then in combination with the implementation of the EUDR and delivery of vDCF standards, they should be in a position to provide evidence of deforestation and conversion-free soy physically delivered to the UK market to support the delivery of the UK Soy Manifesto Goal, subject to this being requested from all Manifesto Signatories.

UK Shipper	Commitment	Progress	Alignment with UKSM
<a href="#">ADM</a>	<p>Aims to achieve deforestation-free status in soy supply chains by 2025.</p> <p>ADM is committed to 100% conversion-free soybean sourcing in high-risk regions of South America with a cut-off date of December 31, 2025. By December 2027, ADM aims to have all</p>	<p>Percentage of DCF average soy purchases <a href="#">(2023)</a>:</p> <ul style="list-style-type: none"> <li>Argentina – 99%</li> <li>Brazil – 96%</li> <li>Paraguay – 98%</li> </ul>	<p>Cut-off date is not aligned – ADM's commitment cut-off date is 2025.</p>

	indirect suppliers sourced by ADM conversion-free, with a cut-off date of 2025.	<ul style="list-style-type: none"> <li>Uruguay – 99%</li> </ul>	
<a href="#">Cargill</a>	<p>Aims to eliminate deforestation across its agricultural supply chain by 2030.</p> <p>Cargill has an accelerated commitment to eliminate deforestation and land conversion from its direct and indirect supply chain of key row crops (including soy) in Brazil, Argentina, and Uruguay by 2025, with a cut-off date of January 1, 2025.</p>	<p>Percentage of volumes estimated to be DCF based on a reference date of 2020 (<a href="#">2024 report</a>):</p> <ul style="list-style-type: none"> <li>Argentina – 99.8%</li> <li>Bolivia – 96.3%</li> <li>Brazil – 99.3%</li> <li>Paraguay – 99.8%</li> <li>Uruguay – 100%</li> </ul>	Cut-off date is not aligned – Cargill's commitment cut-off date is 2025.
Cefetra	Does not have a public commitment.		
<a href="#">Viterro</a>	Committed to achieve deforestation and conversion free soy supply chains in South America by January 2026, with a cut-off date of January, 2025.	<p>Global figures not available (2023)</p> <p>96.5% Verified DCF soy out of total volume of soy purchased directly and indirectly in the 61 focus municipalities in the Cerrado (<a href="#">SCF Annual Report 2024</a>)</p>	Cut-off date is not aligned – Viterro's commitment cut-off date is 2025.

## 2. Challenges in cascading the requirement for vDCF soy up the supply chain to the feed industry and importers, and cost sharing

A key focus of the UK Soy Manifesto's collective work has been to enable vDCF requirements to be specified and integrated within commercial agreements across the supply chain, ensuring the market signal from downstream companies (retailers, food service, manufacturers) is cascaded effectively and efficiently through to the feed sector and shippers. The flow of this market signal upstream has been challenging, in part because of the need to be able to clearly specify what is required and in part because of the need to agree on how the additional costs of vDF and vDCF will be shared across the supply chain.

The developing Standards aim to help unblock this and provide the tools to ensure requests for vDCF soy can be clearly communicated across the supply chains to help translate commitments into action. However, roll-out of these standards will require agreement on how these costs will be shared across the supply chain.

## 3. Regulation – challenges and opportunities

Although the EUDR and the proposed UK FRC (Forest Risk Commodity) Regulations are not fully aligned with the UK Soy Manifesto goal, they have played a key and positive role in driving progress.

The EUDR, if implemented as currently envisaged, will require supply chains of soy into the EU market to be traceable to verified legal and DF farms. If implemented from 1st January 2026 this will change supply chains into Europe and provide an option for UK companies to request legal and deforestation-free soy within UK supply chains through the Standards being developed by the UK Soy Manifesto/AIC. This will be a critical step to enable Signatories to meet the UK Soy Manifesto Goal because it provides, for the first time, a physical link from vDF farms to UK/European supply chains.

Whilst this is positive, regulatory uncertainty and delays in the implementation of the EUDR and the FRC Regulations have undoubtedly been a factor hindering the ability of the UK Soy Manifesto to make progress at the speed we had hoped. It has also meant discussions on conversion, (not within scope of the EUDR), have been made far more difficult.

The role of Regulation remains important as a catalyst for mass market change and to provide a level playing that supports leaders in that market to go further and faster. The UK Soy Manifesto, in its inception, recognised that alongside private sector action, there was a need for action by governments (producer and consumer), and other actors including the finance sector, civil society, and other stakeholders, working alongside the private sector.

Regulatory uncertainty continues to consume resources and attention and does present a risk if there are further delays and the market does not move. The UK Sustainable Commodities Initiative (UKSCI) and Retail Soy Group (RSG) continue to lobby the UK government for clarity and certainty on the UK FRC Regulation and on the application of the EUDR to Northern Ireland and maintenance of exports e.g. of cattle products to Europe.

AIC with the support of shippers, committed to public quarterly reporting on the sustainability status of aggregated UK soy imports including the % that is physically verified DCF and expected to be EUDR aligned. To date, Quarter 1 figures for 2023 have been published [here](#) and figures for 2024 and Quarter 1 2025 have been published [here](#). Whilst it may be a reasonable presumption that non-compliant soy comprises a small proportion of global soy production, reporting to the UK Soy Manifesto has not been consistently provided to evidence this.

The UK Soy Manifesto Secretariat has published an annual progress report based on Signatory data since the inception of the Manifesto and will be published again in 2025 and finally in 2026 at the close of the Manifesto.

The current revised proposed Standard (AIC Sustainable Commodities Scheme (ASCS) 'EUDR-aligned module' Standard, above), with the additional conversion-free module, should rectify this and enable us to verify physical imports of soy in line with the Goal of the Manifesto. From the point of import, the chain of custody will be mass balance, recognising the need to avoid costs of segregation within UK supply chains. We currently lack a mechanism to monitor volumes from farm inputs through to manufacturing.

#### **4. Delays in developing an MRV mechanism**

An aim of the UK Soy Manifesto has been to achieve greater transparency at a national level on the sustainability status of soy imports to the UK and to develop a credible MRV system for soy imports into the UK.

We have made partial progress in developing a MRV system. The development of a standard to verify soy imports was first attempted in 2023 however we were unable to reach agreement at the time, as the chain of custody proposed was a mass balance one,

(hence the development of an alternative approach through BSI and the subsequent standards proposals from AIC).

## **5. Tackling soy in more complex supply chains (embedded soy imports)**

The Manifesto's work has been largely focused on embedded soy from *UK landed soy* fed to UK reared animals. Influencing supply chains of soy to livestock/aquaculture reared outside the UK was always going to be more challenging.

Within EU supply chains of embedded soy products, we anticipate EUDR will, if implemented, ensure soy landed in Europe, fed to European raised livestock, will be at least legal and deforestation-free soy. Progress and discussion on conversion in these markets has been largely overshadowed by preparation for implementation of the EUDR. However, we continue to work with other national soy initiatives/company forums where the ambition remains to go beyond deforestation.

Work on embedded soy in non-European supply chains of meat and aquaculture products is making progress and will continue at pace to help deliver clear pathways to vDCF for key markets.

## **6. Alignment on conversion across Europe**

Recognising that the UK represents less than 1% of global soy consumption, working with other consumer markets is an important way to scale up and support the impact of UK industry action. Alignment across Europe on a shared ambition of vDCF soy is important because of the potential leverage of 38 million tonnes (EU soy consumption) versus 3.5 million tonnes (UK soy consumption) and because, for many Signatories with pan-European operations, there is a need for a pan-European approach.

The UK Soy Manifesto and UK SCI continue to work with other national soy initiatives in Denmark Austria, France, Germany, Switzerland, Norway, Sweden and the Netherlands to raise ambition and accelerate implementation. In the last year, the Danish and Swedish Soy Alliances have both stepped up their commitments more in line with the UK Soy Manifesto.

## **7. The geo-political environment**

The geopolitical climate for commodity trade has become increasingly volatile and complex, posing an additional challenging backdrop to the UK Soy Manifesto and directly for Signatory businesses. This is due to a combination of factors, including heightened geopolitical tensions, rising protectionism, and the impact of both the threats and imposition of tariffs, in particular between the US and China, and US and Europe (including on soy).

These events are disrupting trade flows and supply chains, increasing costs, and making it more challenging for businesses to manage risks. This, in combination with the changes underway within supply chains of soy to comply with the EUDR, has provided an additional difficult backdrop to the development of plans to transition to vDCF soy.

However, amongst many of the current challenges in producer countries, including the threats to the Amazon Soy Moratorium in Brazil, there is cause for some optimism that systemic changes are occurring in the governance of commodity production in part prompted by the impending EUDR.

In Argentina, which represented 35% of the UK's soy footprint in 2023, we have seen the development through the private sector (including major global soy shippers) of VISEC, a

national-level sustainability platform aimed at aligning agricultural exports with international standards like the EUDR and market demands. The VISEC MRV Soy System is officially recognised by the national government and composed of stakeholders from the entire soy value chain, from producers to the shippers. It aims to ensure compliance with the EUDR through advanced satellite imagery, a traceability scheme, and independent third-party verifications.

In Brazil, representing 30% of the UK's soy footprint in 2023, the national government, led by the Ministry of Agriculture & Livestock (MAPA), launched the AgroBrasil+Sustentável in December 2024. This platform aims to integrate private sector governmental databases and centralise information and documentation to enable soy exporting companies to meet legal and market requirements.

Civil society organisations Imaflora, TNC, WRI Brazil with WWF Brazil have also developed Minimum Monitoring Criteria for Brazilian commodities, aligned with Accountability Framework Initiative guidelines. The aim is to standardise due-diligence requests so DCF status can be proven at the first aggregation point, before materials are mixed and become harder to track.

We are seeing more positive signals from China transitioning towards DCF soybeans. COFCO International and Mengniu Group have signed an agreement to supply 1.5 million tonnes of certified DCF soybeans from Brazil to China.

These are positive signs of change on the ground that will support the UK Soy Manifesto to achieve its Goal.

#### **Challenges in achieving the UK Soy Manifesto commitment - key messages:**

- *Transparency on the vDCF status of UK soy imports* has been and remains a key challenge but also a key opportunity to enable and track industry-wide progress.
- *Regulatory uncertainty* remains both a challenge and an opportunity for the Manifesto. If the EUDR goes ahead from the end of 2025 as currently envisaged this will see a shift to physically verifiable deforestation free soy supply chains from origin to Europe/UK that will support the delivery of the UK Soy Manifesto. This should also provide greater visibility of the conversion free status of these supply chains and the ability, through the developing vDCF Standards, for the UK market to request and see evidence of deforestation *and conversion free soy* in UK supply chains. If the EUDR is delayed and the EU market does not move ahead as a whole, this will be a challenge for the UK.
- *Roll-out of the developing vDCF standards will require agreement on how costs will be shared across the supply chain.* The developing Standards aim to provide the tools to ensure requests for vDCF soy can be clearly communicated across the supply chains, but these must be adopted and implemented within commercial agreements across the supply chain.
- *Current geo-political headwinds are likely to remain* and could impact on the Manifesto in 2025/26, but there is evidence that governance mechanisms are developing in key countries of origin for the UK such as Argentina that support the UK Soy Manifesto Goal.
- *Completion of an MRV system is required* to ensure the Manifesto and Signatories individually can track and demonstrate compliance and industry-wide progress.
- *Work on embedded soy in non-European supply chains of meat and aquaculture products is more complex*



## Next steps needed to enable delivery and plans for 2026

We do not believe that it will be possible to achieve the Goal fully by the end of 2025. However, Signatories remain committed to the Goal of the UK Soy Manifesto, and in response to the AFI [call to action](#), the UK Soy Manifesto will continue to:

- Prioritise progress to fulfil the Goal of the Manifesto.
- Communicate milestones and plans to achieve this.
- Disclose progress including through the 2025 Annual Progress Report and other communications.

**Priority next steps and actions required to enable delivery of the Goal are as follows:**

**Clarity on UK regulation on forest risk commodities:** As businesses plan for further investment decisions to deliver vDCF soy in the next 12-18 months, it is critical that the Government make clear if/how they intend to regulate on forest-risk commodities in the UK to enable these businesses to plan ahead with greater certainty.

**Shippers to meet their own commitments:** Shippers need to meet their own DCF targets to ensure they can demonstrate that their own individual supply chains are verified as deforestation and conversion-free, supporting the Goal of the UK Soy Manifesto.

**Implementation of the EUDR:** The EU-wide shift to physically verifiable deforestation-free soy supply chains from origin to Europe/UK from 1<sup>st</sup> January 2026 onwards is a key dependency for the delivery of deforestation-free soy. This move should also enable greater visibility of the conversion-free status of these supply chains and support the delivery of evidence to demonstrate deforestation and conversion-free soy in UK supply chains, on request from the UK market.

**Delivery of vDCF standards:** AIC have committed that the AIC EUDR aligned standard will be in place by the end of 2025 (with feed mills and shippers certified) and the AIC EUDR + conversion module and/or BSI vDCF PAS to be in place in the first half of 2026.

We will work with AIC to ensure these Standards (and the vDCF BSI PAS if this route is pursued) are delivered, operationalised, and available to be specified in contracts from 2026.

**Continued work to establish vDCF pathways for embedded soy:** Members of the Embedded Soy Working Group remain committed to continuing to develop and refine vDCF roadmaps toward full alignment with the UK Soy Manifesto Goal for key geographies and products, with a focus on poultry from Thailand, and aquaculture.

**Strengthened alignment on conversion-free soy across Europe:** Strong, aligned European-wide demand for conversion-free soy will present a stronger market signal for the feed industry and shippers and a level playing field for UK businesses. The UK Soy Manifesto will continue to engage with other national soy initiatives across Europe to raise ambition and accelerate implementation.

**Development of a credible, transparent MRV system for UK soy:** Building on progress to date, the priority is to work with AIC and the shippers to reinstate and maintain quarterly reporting on national UK soy imports—ensuring transparent monitoring and reporting of the anticipated progress by all parties towards 100% vDCF soy over the next crucial 12–18 months. The current proposed standards will provide a mechanism to track the purchase of vDF and vDCF soy within UK supply chains, but further work is needed to monitor



volumes from farm inputs through to manufacturing. The UK Soy Manifesto will continue to report on progress in 2026 by disclosing 2025 data and individual Signatories will continue to report (as per their commitments) until the UKSM commitments are fulfilled.

**Broader market transformation to support DCF landscapes:** We recognise that the UK Soy Manifesto is only one part of a broader set of actions that are needed to support sustainable soy production globally, through private sector action in supply chains, government action, and support from civil society. This type of action is required to transform supply chains in a sustainable and inclusive manner, prioritising areas with the greatest impacts and risks. This includes providing support to producers and investing in sourcing landscapes and jurisdictions.

Many of our Signatories are supporting sustainable soy production through other activities, such as the ongoing purchase of certification. Three UK retailers within the UKSM group have taken action to address the challenges and barriers in the DCF transition by investing in on-the-ground initiatives in the Cerrado biome to support farmers to produce and protect legal reserves within their land through the [Responsible Commodities Facility](#) (RCF). Mechanisms such as this can be scaled with multiple private actors to support DCF soy production.

## Annex

### Verified Deforestation and Conversion Free soy - definition

Under the UK Soy Manifesto verified deforestation and conversion-free soy is defined as:

- Evidence of sourcing from lower risk source (North America/Canada/EU)  
and/or
- Evidence of sourcing from any country not defined as lower risk (for example Brazil, Argentina, and Paraguay) with physical verification of DCF status up to point of import into the UK. This could include soybeans/meal verified to the point of UK import as not being linked to deforestation and conversion after January 2020 through:
  - Third party assured direct monitoring e.g. soybeans assessed/verified DCF through a jurisdiction or farm(s) level monitoring system including: jurisdictional/ landscape approach, soy supplied to the UK market from the Amazon, under Amazon Soy Moratorium contracts, or trader's own verification system.
  - Certification with a physical chain of custody claim at the point of UK import (currently only segregated CoC available but RTRS/Proterra models for mass balance carrying 100% DCF assurance are in development).

### In transition:

- Soybean meal equivalents supplied to the UK market covered by a certification scheme that has been successfully benchmarked against the FEFAC Soya Sourcing Guidelines 2023 including the conversion-free module (criteria 31), via mass balance, area mass balance or regional credits are defined as in transition, but not vDCF.
- Purchases of certified material that support sustainable soy production but lack chain of custody assurance that vDCF soy has entered the Signatories' supply chain, do not comply with the UK Soy Manifesto Goal.

END