

Implementation of the EUDR in Argentina: reduction of deforestation or greenwashing?

On May 22nd 2025, the European Commission (EC), through an [Implementing Act](#), published its first list of [country risk classifications](#) under the European Union Deforestation Regulation (EUDR), categorizing 140 countries as low, 50 as standard, and 4 as high risk of deforestation associated with the production of EUDR-relevant commodities (soy, cattle, wood, cocoa, palm oil, coffee and rubber). Argentina was classified as standard risk country. Article 29 of the EUDR announced that benchmarking would apply to “countries or parts thereof”; however, at this stage, the classification was conducted at the national level.

Currently, the organization leading the EUDR implementation in Argentina ([VISEC](#)) is a private initiative led by powerful business chambers ([CIARA](#) and [CEC](#)) that protect the interests of the seed processing and exporting industry, in association with the main actors of the soybean and meat agribusiness: trading companies, brokers and producer’s organizations.

VISEC developed a Monitorin, Reporting and Verification-system (MRV) aimed at complying with EUDR due diligence requirements and other forthcoming international regulations. The stated goal of the MRV system is that “the total volume” of soybean grown and beef produced in Argentina is “recognized as deforestation-free, in compliance with the sustainable development requirements the world is adopting”. VISEC aims to promote the idea that Argentina presents a low risk of deforestation associated with the production of soybean and beef, and that it should be classified accordingly.

A few months ago, the Argentine Government presented to the EC a [report](#) that supports this position and the leadership of private sector actors in the implementation of the EUDR. After the publication of the country risk classification, [the Argentine Government asked for a reconsideration](#) before December 31st 2025 and pleaded for the assignment of a low risk category.

This stands in contrast to the reality of the Argentine Chaco region, a vast forest area which remains a global deforestation hotspot, driven by agricultural expansion. Additionally, as currently planned, the implementation process fails to engage local communities, ignoring the widespread violation of basic human rights associated with deforestation in that region.

Based on available information we show that, under this scenario, the implementation of the EUDR in Argentina could:

- » underestimate the high risk of deforestation of the native forest of Chaco Region
- » overestimate the low risk of deforestation in the main agricultural non forest area of the Pampas
- » mask the infringement of human rights of people that inhabit native forests of the Chaco Region
- » exclude mechanisms of participation and control of key stakeholders

POLITICAL CONTEXT

The current National Government of Argentina is advancing towards an extractivist agenda and actively dismantling existing mechanisms for environmental and human rights protection. The country has officially rejected the 2030 Agenda for Sustainable Development and the Sustainable Development Goals reaffirmed by the recent Pact for the Future. This reflects the Argentine Government’s isolation from the international environmental policy consensus in which the EUDR is rooted.

At the same time, Argentina is offering unprecedented fiscal and legal incentives for large investments (enshrined in the Régimen de Incentivos para Grandes Inversiones - RIGI) that promote the accelerated exploitation of natural resources. In accordance, [the former Ministry of the Environment has been demoted to a much lower hierarchical level](#).

This trend also affects the protection of native forests in Argentina. In 2024, federal funding allocated to the protection of native forests fell to its low-

est level since the program's introduction in 2010, amounting to only 9.1 million €, or 0.17 € per hectare of native forest (5.5% of the amount required by law). However, even this meagre sum was subject to severe under-execution. Moreover, in October 2024, an Executive Order dissolved the trust fund established in 2018 to ensure administrative transparency and safeguard these resources from discretionary use by the executive.

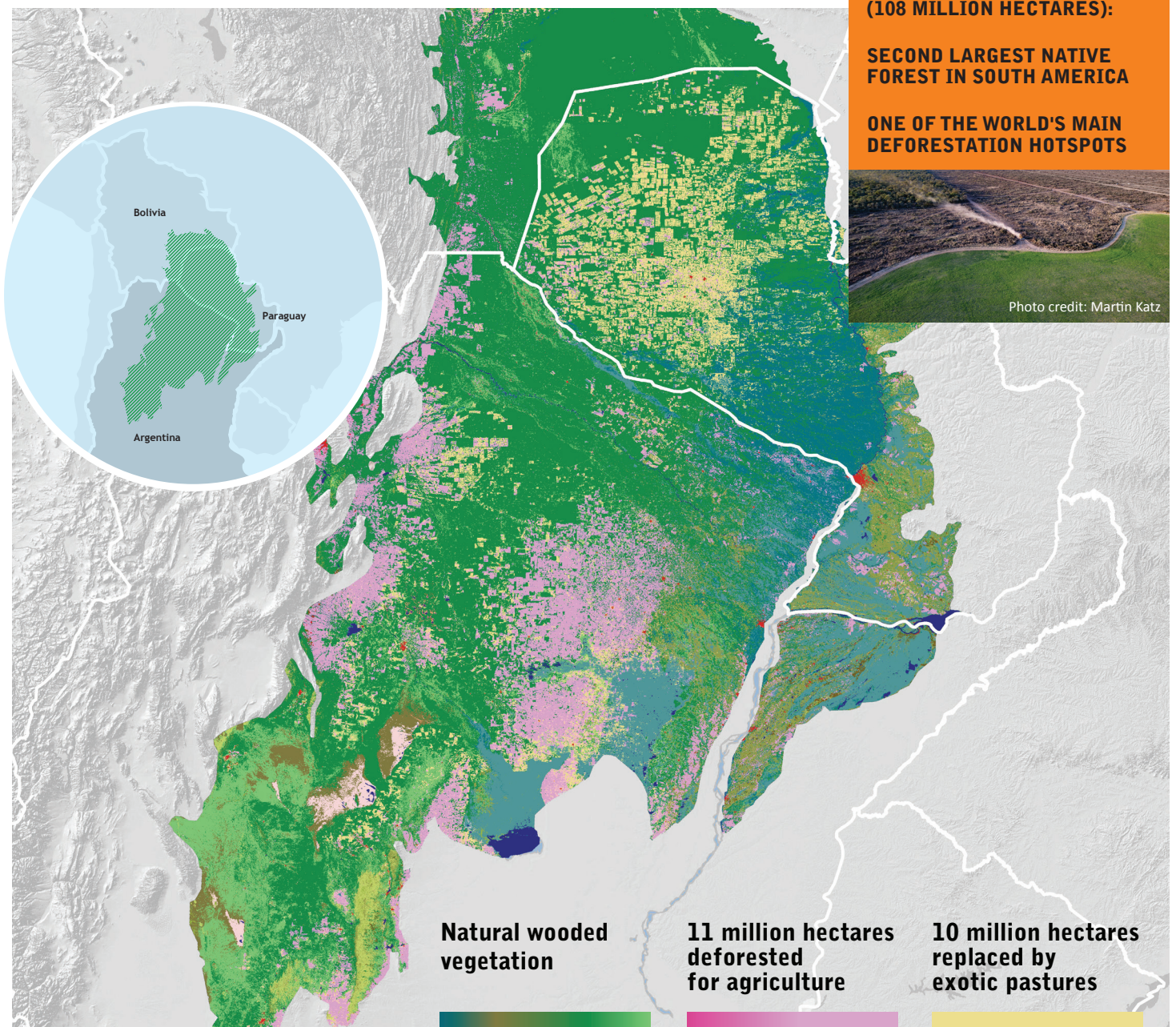
Following suit, provincial administrations politically aligned with the National Government have tried to redraw their Native Forest Land Zoning (Ordenamiento Territorial de Bosques Nativos - OTBN) in ways that reduce forest conservation requirements. The most blatant of such attempts, by the province of Chaco, has been temporarily halted through a court order, but a final decision is still pending. In the course of the legal proceedings, a complex and long-standing network of corruption and efforts to conceal illegal deforestation has come to light. Similar concerns have also been raised in other provinces, although concrete evidence has often been difficult to obtain.

Regarding the protection of the rights of indigenous and tribal peoples, to which Argentina is bound as a part of Convention 169 of the International Labour Organization, the current administration has also taken steps to reduce existing safeguards. This includes the termination of law 26.160 which declared an emergency state for community lands possessed by indigenous people and prevented their eviction, the registration of indigenous communities undertaken by the National Institute of Indigenous Affairs (Instituto Nacional de Asuntos Indígenas - INAI), and the dissolution of the National Institute of Family, Peasant and Indigenous Agriculture (Instituto Nacional de la Agricultura Familiar, Campesina e Indígena - INAFCI).

Concerns have also been raised as to this government's respect for basic civil rights, particularly freedom of expression for environmental and human-rights advocates. An internal government document, leaked to one of Argentina's major news outlets, illegally instructs intelligence agencies to monitor environmentalists, journalists and actors obstructing development projects on the grounds of protecting the "cultural and/or sacred heritage of local populations", among others.

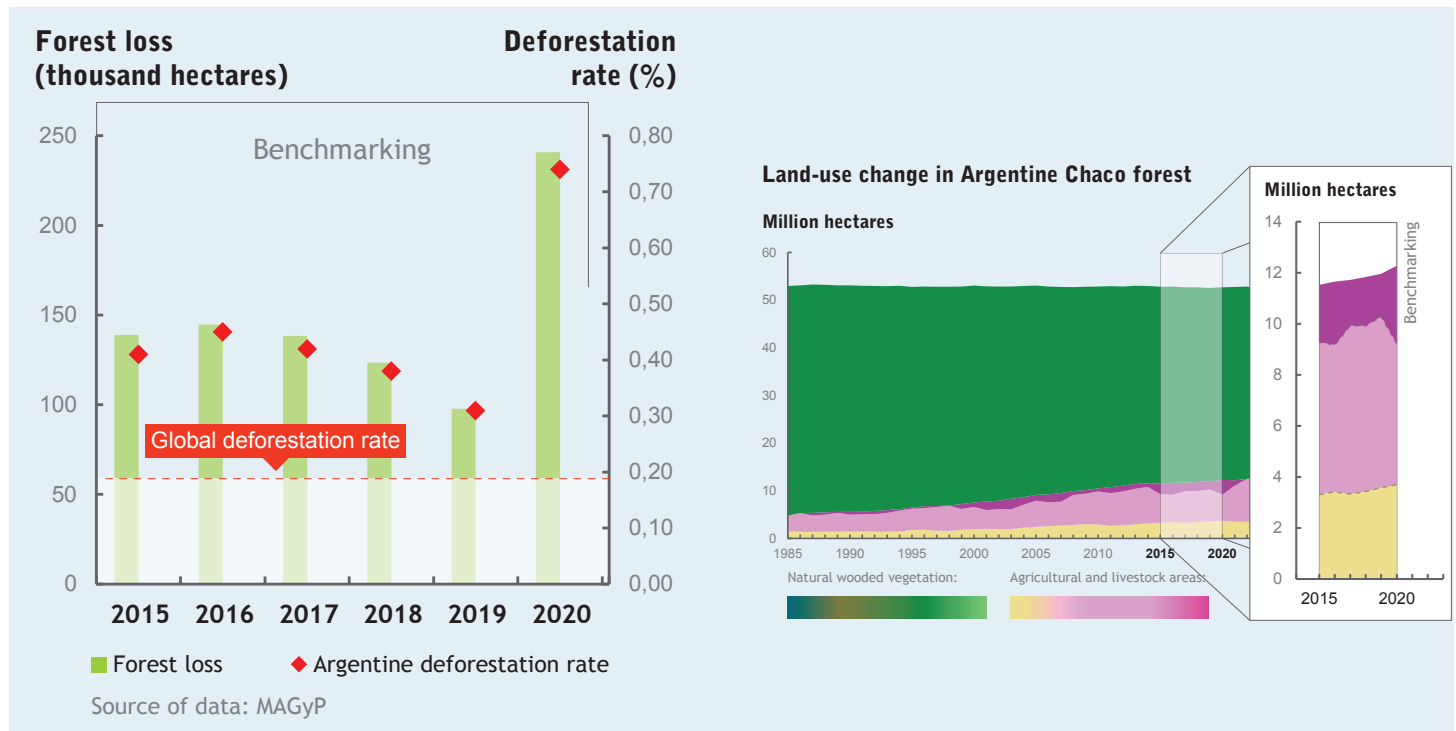
In this political context, deforestation rates in the Argentine Chaco region are likely to remain high or even increase, as policies aimed at curbing them are under attack and human rights safeguards for forest-dwelling indigenous and peasant communities are being dismantled. Lowering Argentina's assessed deforestation risk under these circumstances appears overly optimistic.

DEFORESTATION IN THE CHACO REGION



The Gran Chaco is the second largest forest of South America, after the Amazon rainforest. It covers 108 million hectares and extends into Argentina (60%), Paraguay (23%), Bolivia (11%) and Brazil (<5%). Forest loss has been rampant in the Chaco since 1985. Most of the woodland loss between 1985 and 2020 occurred in Argentina (10.3 million hectares; average annual loss rate of 0.9%), followed by Paraguay (7.8 million hectares, 1.3%), and Bolivia (1.2 million hectares, 0.35%) (Baumann et al. 2022).

The Argentine Chaco ecoregion spans 65 million hectares, encompassing a mosaic of forests, savannahs and grasslands. In the core of the region is the Dry Chaco (with 49 million hectares). The dry forests of this ecoregion are among the most transformed through land use changes in favor of annual crops (mainly soybean) and cultivated pastures (mainly exotic megathermic grasses). This process accelerated in the 1990s and was driven by a combination of factors that included the general adoption of no tillage farming and glyphosate resistant soybean varieties, as well as the high price and international demand of commodities that promoted agricultural expansion and displacement of large-scale cattle ranching from the fertile core in the Humid Pampas towards the periphery of the agricultural belt, with less productive and cheaper land (Llanes et al. 2025) of fragile ecosystems such as the Dry Chaco (Aguiar et al. 2016). In this sense, soybean expansion outside the Chaco (in Argentina, Paraguay and, to a lesser extent, Bolivia) has a tight correlation with deforestation in the Chaco Region (Fehlenberg et al. 2017). This suggests that soybean expansion in South America, regardless of where it occurs, is an underlying driver of deforestation in the Chaco. As a result of this process, 6.53 million hectares have been deforested in the Argentine Dry Chaco over the last three decades.



Annual deforestation rates, while lower than in the 2000s, remained high after the enactment of National Forest Law in November 2007 (0.93% between 2008-2011 and 0.86% between 2012-2013), and were still above the global average of 0.2% between 2015 and 2020 (the time frame used for the country risk assessment by the EUDR benchmarking system) (Baumann et al. 2022, Native forest monitoring report of the Subsecretariat of the Environment 2023). Between 2015 and 2020, 869 thousand hectares of natural woody vegetation of the Argentine Chaco Region were lost according to Mapbiomas (the Subsecretariat of the Environment reports a slightly higher value of 884 thousand hectares). This represents a loss of 2% of the woody vegetation of 2015 (0.40 or 0.46% mean annual loss rate according to Mapbiomas or Subsecretariat of the Environment). In the same period, the region experienced an increase of 393 thousand hectares of cultivated pastures and 351 thousand hectares of agricultural crops. Between 2020 and 2023, an additional 855 thousand hectares of woody vegetation were lost, and the agricultural surface increased by 793 thousand hectares.

DRIVERS OF DEFORESTATION AND LAND-USE CHANGE DYNAMICS

One of the main arguments advanced by CIARA to claim for a low-risk categorization points to the fact that, according to the National Statistics, the area sown with soybean did not increase at the country level since 2015 (actually, it slightly decreased). However, the national trend disregards the temporary change in the choice of crops that responds to climatic and price factors and the regional variations: Overall, between 2015 and 2024, the surface sown with soybean decreased at an average rate of 0.27 million ha/year and that sown with maize increased at a rate of 0.31 million ha/year. In the Pampean Region (very suitable for agriculture due to the rainfall regime and fertile soils) during the benchmarking period (2015-2020), the area sown with soybean decreased (-2.6 million ha) while the area sown with maize increased almost 2 million hectares.

In the Chaco Region, land-use changes are complex, but the overall outcome, as stated above, is an ongoing deforestation process (1.72 million ha deforested since the start of the benchmarking period). Cattle ranching, relying heavily on cultivated pastures, is generally recognized as the main proximate driver of forest loss (Mosciaro et al. 2023). But land initially cleared for pasture is often later converted to cropland, following a gradient of intensification (Fehlenberg et al. 2017). Indeed, between 1985 and 2020, 40% of all areas deforested in the Gran Chaco were first converted to cultivated pastures, and subsequently to croplands (Baumann et al. 2022). However, this trajectory does not always lead to permanent conversion to croplands because there is also a non-negligible abandonment of agricultural fields that can no longer sustain continuous agriculture due to soil degradation processes (Marchesini et al. 2017).

DRIVERS OF ILLEGAL DEFORESTATION

In Argentina, concerns over rising deforestation rates led to the enactment of National Law N° 26.331 in November 2007, commonly known as the “Forest Law” (Ley de Bosques). The law aims to protect native forests and the ecosystem services they provide by regulating their conversion to agricultural land and demanding sustainable forest management. In accordance with the distribution of environmental regulatory powers established in the National Constitution (Article 41), the federal government sets minimum standards, while each province is responsible for ground truthing and enforcing those standards. Under the Forest Law, provinces were required to develop a Native Forest Land Zoning (Ordenamiento Territorial de Bosques Nativos, or OTBN), classifying forests into categories of high, medium, or low conservation value based on technical criteria and through a participatory process. Forests assigned a high conservation value are subject to strict protection; those of medium value may be used under sustainable management practices; and areas of low conservation value may be legally converted to other land uses, such as cropland or pasture.



Photo credit: Martin Katz

However the effectiveness of the Forest Law has been widely questioned (Aguiar et al. 2018, Volante and Seghezzo 2018, Camba Sans et al. 2018, Salas Barboza et al. 2019), not only because, more than fifteen years after its enactment, deforestation remains unabated, but also because at least 28% of deforestation has been found to be illegal. (Blum et al. 2022, Vallejos et al. 2021). Several factors have contributed to the Forest Law’s limited impact, particularly in the Chaco region. Here, some provinces have used their zoning authority to classify large areas of forest as of low conservation value, in line with agendas favoring agricultural expansion. At the same time, lax enforcement on the ground has failed to prevent illegal clearing in all conservation categories. Additionally, regulatory loopholes have enabled the legalization of deforestation beyond the areas classified as low conservation value forests. This includes ambiguities surrounding the classification of silvopastoral systems as sustainable forest use (see Box 1); mechanisms for “re-zoning” individual plots by non-transparent administrative decisions, effectively bypassing land zoning plans; and the classification of forested areas as non-forest in land-zoning maps (which leads to official statistics reporting deforestation in non-categorized areas).

On the other hand, the clearing of forests classified as low conservation is often also illegal, e. g. by ignoring regulations on windbreaks, riparian forest buffers, maximum deforestation thresholds, etc. Therefore, checking that a plot deforested before 31st December 2020 (the cut-off date for EUDR) was classified as low-conservation value does not ensure that it was legally cleared.

BOX 1: SILVOPASTORAL SYSTEMS AND DEFORESTATION



Photo credit: Martin Katz

According to official reports, between 2019 and 2023, 20% of forest loss in the four main provinces of Argentina’s Chaco region could be attributed to so-called silvopastoral systems. However, this figure is an underestimation, as it does not include all conversion of forest to cattle ranching. On the one hand, it excludes lands cleared for pasture without retaining any woody vegetation; on the other hand, it does not include all silvopastoral systems, but only those in which the intensity of vegetation clearance, as determined through medium-resolution satellite imagery, is considered sufficient to cause the area to no longer function as a forest ecosystem or provide its associated ecosystem services. But regardless of this distinction, these silvopastoral systems involve the partial removal of woody vegetation and generally rely on the introduction of exotic pastures, making it difficult to see how they could be excluded from the definitions of deforestation and degradation under the EUDR without significant reinterpretation or adjustment. Legality under Argentine regulations, while a EUDR requirement, is not sufficient to ensure compliance with the zero-deforestation-or-degradation rule.

Many cattle-ranching systems in the Chaco region involve extensive removal of woody vegetation and the introduction of exotic pastures. Despite their ecological impact, such practices are often labeled “silvopastoral” and recognized as “sustainable forest use” by some provincial governments.

HUMAN RIGHTS, COMMUNITIES AND TENURE CONFLICTS

Rural land tenure is poorly defined and opaque in many parts of Argentina, notably in the forested areas of the Chaco region. Smallholders and Indigenous communities, in particular, have faced persistent difficulties in securing formal recognition of their tenure rights. Over the past three decades, the large-scale transformation of land use has often led to the partial or complete exclusion of forest-dwelling populations from access to the resources essential for their livelihoods.

While the widespread problem of poorly defined tenure rights has been documented at least since the 1960s, and has repeatedly been analyzed in reports commissioned by different government agencies over the decades (Villaro 1986 and Slutzky 2008, among others), effective policies to address this issue have not been adopted either at the national or the provincial levels. As a result, when market conditions and technologies combined to attract new investors to the Chaco region from the 1990s onward, accelerating land-use change and deforestation, as described above, numerous conflicts over land tenure ensued, often resulting in the loss of access to land and forests for the pre-existing populations.

Case studies and news reports on conflicts are abundant, but the precise extent of the problem is hard to pinpoint, as no comprehensive database on tenure conflict exists. One study commissioned by the Ministry of Agriculture in 2013 analyzed a non-exhaustive sample of contested land tenure, with 857 cases involving 9.3 million hectares and 64 thousand homesteads throughout Argentina; 33.5% of cases involved long-standing conflicts (20 years or more), pointing to ineffective mechanisms for conflict resolution and the protection of human rights. Also in 2013, an independent observatory created by the NGO Red Agroforestal Chaco Argentina (REDAF), identified 386 active conflicts in the Chaco region; 130 thousand people and 2.8 million hectares of land were involved in documented tenure conflicts. Another study published in the same year counted 27 homicides related to tenure conflicts between 1996 and 2013; the victims in all cases belonged to the local populations. Unfortunately, more recent systematic data is not available, due to the high cost of maintaining comprehensive databases over an extended period of time. There is, however, no reason to suppose that conflicts have become less frequent or less harsh.

The land rights of indigenous peoples have fared little better than the customary rights of other forest-dwelling populations, despite the existence of special regulations intended to protect them. In the 2013 study on contested tenure situations mentioned above, 24% of the documented cases involved indigenous communities. Argentina is a party to the Indigenous and Tribal Peoples Convention of 1989 (ILO Convention 169) and, through its 1994 constitutional reform, formally recognized the rights of pre-existing indigenous people to the land they have traditionally occupied. Thirty years later, however, legislation defining the precise conditions and scope of those rights remains absent. In 2007, Congress enacted an emergency law suspending evictions of indigenous communities and mandating a survey of their territories. Implementation of this measure was slow, and the state of emergency was repeatedly extended through successive laws until the present government decided to terminate it—a decision strongly opposed by indigenous organizations.

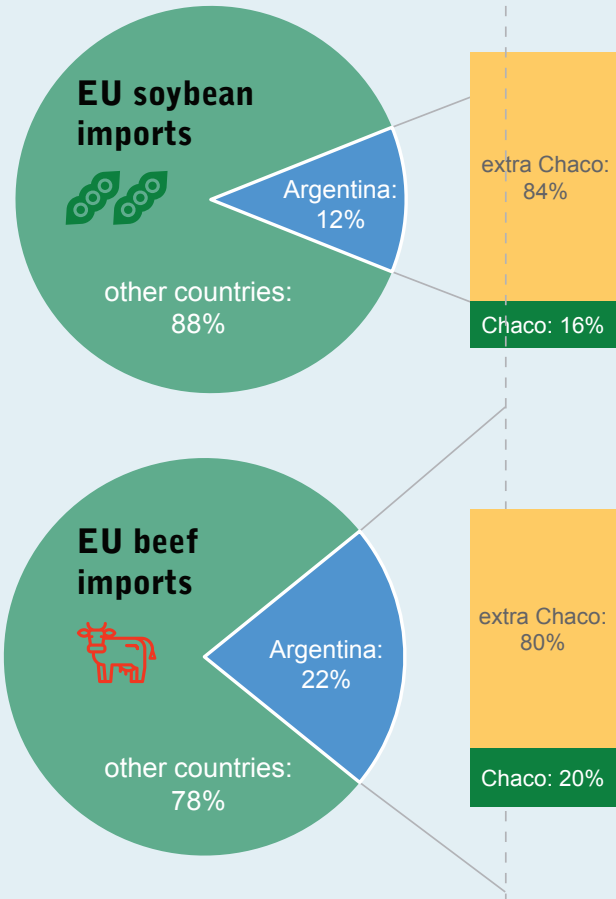
Furthermore, in a non-negligible number of cases, the expansion of agriculture and cattle ranching has involved illegal encroachment on state-owned land, leading to conflicts between the authorities and private occupants.

In sum, compliance with the EUDR legality requirement entails far more than conformity with forest protection laws. It also requires ensuring adequate protection of human rights and the legality of land tenure, at a minimum in line with international frameworks such as the World Bank’s Operation Manual OP 4.36.

TRADE

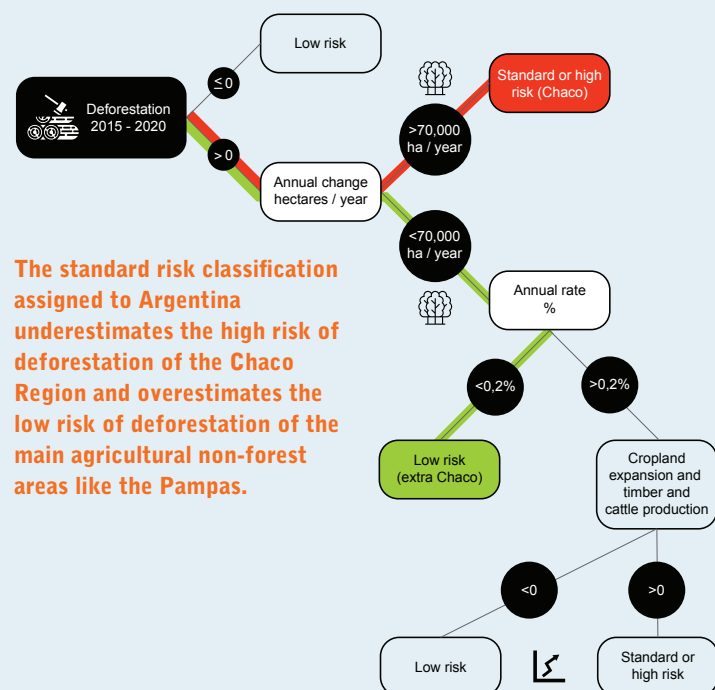
The trade relationship between Argentina and the European Union (EU) in soybean and beef is significant for both parties. In 2024, European markets accounted for 9% of Argentina’s soybean exports and 19% of its beef exports by value, while for the EU, these products represented 12% and 22% of their total soybean and beef imports, respectively. The majority of Argentina’s soybean and beef exports originate from extra Chaco Regions (mainly Pampas) where 84% of soybean cultivation and 80% of cattle stock are concentrated. As such, strict implementation of the EUDR would likely not disrupt supply chains to a significant extent.

However, 20% of Argentina’s cattle stock and 16% of soybean cultivation are located in the Chaco region, a global deforestation hotspot. Given the EU’s importance as a destination for Argentine exports, full implementation of the EUDR could have a meaningful impact in protecting this region—especially if other major trade partners, such as China and India, adopt similar regulatory measures.



IMPLEMENTATION ISSUES

BENCHMARKING SYSTEM USED TO CLASSIFY COUNTRIES OR PARTS THEREOF ACCORDING TO RISK CATEGORIES



Argentina is a geographically vast and ecologically diverse country, with different climates, soils, and natural land covers. The Pampean Region is Argentina's main agricultural region, accounting for 63% of the area cultivated with soybean during the 2023-2024 growing season (according to the [estimates from the Ministry of Agriculture](#)). Similarly, 47% of the country's cattle stock is raised in the Pampas. These products can be considered deforestation-free because the area was dominated by grasslands before the introduction of agriculture in the 20th century ([Morello et al. 2012](#)). However, over the past three decades, a combination of macro-economic, technological, and climatic changes stimulated the expansion of soybean farmers, cattle ranchers, and land investors from the Pampas to the neighboring Chaco Region. As a result, the Argentine Dry Chaco has become a global deforestation hotspot with annual deforestation rates exceeding the global average of 0.2% used in the EUDR benchmarking system to separate low from standard and high risk countries. Today, 16% of Argentina's soybean and 20% of its beef is produced in the Chaco Region. Thus, assigning a single deforestation-risk category to Argentina as a whole will result in either overestimating the risk for the Pampas or underestimating it for the Chaco Region. From our perspective, Article 29 of the Regulation provides an adequate solution to this problem, as it allows for benchmarking of "countries or parts thereof". While the Pampas deserve to be classified as low-risk, this does certainly not apply to the Chaco, which should be considered a high-risk region. The current standard-risk classification represents a compromise between these contrasting realities, but it is likely to result in an inefficient allocation of oversight and control resources.

DUE DILIGENCE SYSTEM USED TO OPERATIONALIZE THE REGULATION'S REQUIREMENTS

According to the EUDR, operators placing products on the EU market must exercise due diligence to ensure compliance with (a) the deforestation-free requirement, and (b) the legality requirement. As discussed, both aspects present significant challenges.

a) Deforestation-free requirement. Proposed compliance methods rely on comparing the boundaries of a productive unit (polygon) with processed satellite imagery and ensuring traceability of products from origin to final destination. The criterion for compliance is that the polygon must have been cleared before 31st December 2020. In the case of soybean, traceability challenges in Argentina appear manageable through the use of information supplied by farmers and state agencies to the private actors involved in the MVR system. For beef, however, the difficulties are considerably greater: cattle are typically moved across multiple locations over their lifespan, and feed is sourced from different fields—all of which must also meet the deforestation-free requirement. To date, no convincing scheme has been proposed to address this complexity.

b) Legality requirement. For productive units that meet the deforestation-free criterion, soybean and beef must also be shown to comply with Argentine legal requirements. This extends beyond adherence to native forest protection regulations to include respect for the human rights of populations potentially affected by agricultural expansion, as well as compliance with other regulations (e.g. labour, taxation, etc.). As noted, cross-checking deforestation polygons against native forest land-zoning maps is insufficient to demonstrate compliance with forest regulations, and no method based solely on image analysis can achieve this. Human rights protection for indigenous peoples, customary landholders, and other forest-dwelling populations in Argentina remains notoriously fragile; in this context, the absence of pending lawsuits over land tenure conflicts may reflect limited access to justice rather than the absence of conflict. Meeting the EUDR standard therefore requires monitoring human rights compliance through mechanisms more robust than simply noting the absence of litigation. With respect to other aspects of legality (such as labour or tax compliance), EU guidance will be essential to ensure the application of uniform standards throughout different countries affected by the EUDR.

c) Inclusion of stakeholders. An essential element for strengthening the implementation of the EUDR in Argentina is the effective inclusion of diverse stakeholders in the monitoring process. Current compliance proposals are being advanced exclusively by the private sector—certainly a relevant actor, but one whose interests do not necessarily align with the broader objectives of the EUDR. To ensure credibility and effectiveness, indigenous peoples, customary landholders, environmental advocates, and other actors engaged in the defense of the environment and human rights (such as NGOs and academia) must have accessible and meaningful opportunities to influence decision-making. This should include:

- » **Access to information** on land units classified as deforestation-free within the due diligence process, for instance through open access to polygon data (with sensitive ownership information removed in accordance with legal requirements).
- » **Effective whistleblowing mechanisms** to report illegal practices or violations of EUDR requirements, such as tampering with the traceability system.
- » **Channels to raise conflicts** concerning human rights violations or other infringements of legal protections that are directly relevant to EUDR compliance.