



CONFEDERATION DES ASSOCIATIONS NATIONALES DE TANNEURS ET
MEGISSIERS DE LA COMMUNAUTE EUROPEENNE

CONFEDERATION OF NATIONAL ASSOCIATIONS OF
TANNERS AND DRESSERS OF THE EUROPEAN COMMUNITY

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Attn.: Mr Rubens Carvalho

Deputy Director

Earthstight

Brussels, 16 March 2026

Dear Mr Carvalho,

On behalf of the Confederation of National Associations of Tanners and Dressers of the European Community (COTANCE), the Brussels-based non-profit organisation representing the European tanning industry, I am pleased to provide this letter in response to your request for information to be received no later than Monday 16 March 2026 5pm GMT. Please acknowledge the timely reception of this correspondence and note that your letter and our answer will be published in full on our website.

Let me start by drawing your attention to some inaccuracies in your letter dated 11 March 2026 for your kind consideration:

You say that you are to publish a story naming COTANCE that draws the links between the leather sector's lobbying and political actions against the EU Deforestation Regulation (EUDR). Please note that COTANCE is not "against the EUDR". Our actions and position statements indicate that we support the aim of the EU to address this crucial environmental issue. However, in our advocacy, we provide the evidence that cattle hides, skins and leather are not drivers of livestock breeding and cannot therefore be considered as a driver of deforestation. As you know, we also contend that the EU demand of these goods is unable to lever any behavioural change in the upstream supply chain, which obeys exclusively to considerations in the food markets. The low value of these cattle by-products makes that, according to best estimates, globally about [40% end up as waste](#). For all these reasons, we call on policymakers to exclude them from the scope of the EUDR.

The European leather industry does not ignore the many scientific papers on the environmental impacts of cattle but contends that their rearing and slaughter are determined by the demand for meat and milk, where the hides or skins result as a residue or "non-determining by-product". Treating them in lifecycle methodologies the same as if they were a *steak* is in our view a methodological mistake, as the former is a "product" while the latter is a "by-product". Lifecycle practitioners and researchers widely acknowledge that Life Cycle Assessment (LCA) is an unfinished or evolving science, with the allocation of by-products (multi-functionality) cited as one of its most controversial, subjective, and unresolved methodological challenges.

It is true that "the leather sector has been publicly declaring its commitment to traceability for years", as a means for better quality raw material sourcing. But it is a fact that EUDR mandatory geolocation-based cattle traceability is currently unavailable worldwide and virtually unenforceable at scale in the short term in extra-EU supply chains, including in low-

risk countries. With an EU that hardly imports any meat, it is unrealistic to believe that the sole demand for cattle hides achieves cattle traceability worldwide. Since the EU leather industry imports 40% of its raw material needs, the consequence is a supply shock, as forecasted by the [Pisa Study](#) we commissioned to assess the consequences of the EUDR on our industry. COTANCE set up the [Leather Traceability Cluster](#) in 2022 as a response to the adoption of the EUDR and in an attempt to further alignment in traceability requirements by certification and audit bodies. Advocating the exclusion of hides, skins and leather from the EUDR-based traceability, is not in contradiction with our pledge for voluntary and viable traceability that the sector needs for satisfying its customers' necessities that encompass a multitude of traceability objectives in addition to deforestation-free supply chains.

[COTANCE meetings with Commission officials](#) can be traced in the EU Transparency Register. As the official European trade organisation for the leather industry, and employers' side in the Social Sectoral Dialogue, such meetings cover a variety of topics, including our position with regard to the EUDR. The Transparency Register indicates also the EU funding that we get for the development of projects (education & training, social dialogue), which in 2024 - 2025 was roughly 200,000 Euro, or half of our budget income, the balance coming from membership subscriptions. Please note that COTANCE employs 4-5 staff members. It is therefore misleading to say that "COTANCE had spent €400,000 to 499,999 (the range ticked in the Transparency Register) in FY2024 on lobbying activities".

Leather industry bodies COTANCE and UNIC have made the case for excluding leather from the EUDR in a workshop at the European Parliament in Brussels on June 3, 2025.

Hosted by Italian MEP Salvatore De Meo, UNIC and COTANCE used the workshop to present a clear, science-supported message that leather is not a driver of deforestation and deserves to be among the products that are exempt from the requirements of EUDR.

More than 50 people attended the event, with representatives of the US, Argentina, Turkey and Australia taking part alongside officials from EU member states, the European Commission, members of the European Parliament, international organisations, industry experts and representatives from the leather industry.

The findings of the [study](#) conducted by the Sant'Anna School of Advanced Studies at the University of Pisa formed part of the industry's message. This 2024 study offers a comprehensive review of academic literature and available data on whether leather contributes to deforestation or not. An important aspect of the workshop was thus that it served as what UNIC and COTANCE called "the missing impact assessment on leather". The European Commission has carried out no assessment of the impact EUDR is likely to have on the leather industry in the European Union. It also failed to provide it by the June 2025 deadline according to the original EUDR Article 34 in relation to the footnote 99 of page 33 of the inception impact assessment of the EUDR. This event filled this "critical gap".

I hope this is useful and look forward to receiving a copy of the Earthsight story.

*In respect of the principle of adversarial proceedings and the right of reply, we ask for **a formal guarantee** that the contents of this communication will be **fully reported** in your publication.*

Yours sincerely,



Gustavo Gonzalez-Quijano
Secretary General