

Paper Review - Sept 2026

Journal: Land Systems

Title: Conditions for an effective EU regulation on deforestation-free products: Where will it likely reduce deforestation?

September 14th 2026

Dear editors,

Thank you for your invitation to review the manuscript entitled “Conditions for an effective EU regulation on deforestation-free products: Where will it likely reduce deforestation?”. This is a truly interesting piece of work that, if published soon, would be timely given the expected rollout of the EUDR by the end of 2026. I believe it can contribute to the literature on transnational regulation, policy analysis, and multistakeholder governance for agri-food commodities. I recommend minor adjustments before publication. The article is particularly strong in stressing the importance of acknowledging that the EUDR will likely have heterogeneous effects when implemented. While expecting heterogeneous effects might seem obvious (given the diversity of commodities and producing countries and regions, it would be highly unlikely otherwise), the paper offers an analysis of a set of ‘conditions’ (mainly market aspects) that exemplify precisely why and where heterogeneity is expected. The analysis relies on quantitative data evidence, and the main theoretical underpinnings stem from economics and public policy analysis. The paper advances the understanding of the potential EUDR effectiveness, policy design shortcomings and policy implementation challenges. Following the Land Systems/Copernicus guidelines for review, the score I give to this manuscript is 1 (one, for ‘excellent’). However, I have suggestions that aim to polish some of the aspects that could be improved. I list my comments according to the subtitles within the manuscript.

Methods and materials: While the authors mention the theories and literature they consulted (lines 117 - 124), at this point it is not clear what the main takeaways are from those bodies of literature and how they shape the analysis. Yes, later within each sub-section some of those details are given (for instance, explaining the Brussels effect), but the reader knows little about what the theories ‘in economics related to land-system science’ offer. Crucially, while the TOC approach is explained, the section and paper itself could be more robust if the author(s) clarify here that the policy analysis encompasses (in terms of units of analysis) different types of regulated actors (companies, producers and producing countries). Therefore, the granularity of the information increases, but equally the complexity in presenting the chain of incentives, causal linkages, etcetera. Although eventually the main findings are organised into the larger unit of analysis (FRC producing country). Finally, a minor comment here: the term ‘Europeanization’ is not used later, for instance when discussing the Brussels effect (at least not mentioned explicitly in the subsection). It would equally be good to have a short description of it here, so the reader goes into the analysis section more informed.

Market access pathway: I have a few minor comments for this sub-section; please refer to the lines I am pointing to. However, the most crucial suggestion would be to bring the information on the EU market share to the forefront of the section. My suggestion stems from the fact that the EU market share not only incentivises investments in traceability, but it is the predominant factor/condition upon which the market access pathway relies. Hence, at least a couple of lines on this around lines 196 - 197 of the current manuscript. Some extra comments for this pathway are listed next.

- Lines 189 - 196: Are the EUDR aims circumvented or undercut when ‘market segregation’ occurs? Or is it an effect that organically stems from the policy design? A fulfilment of the policy aim can be achieved (in the sense that the EUDR’s Article 1 is being achieved in *(a) minimising the Union’s contribution to deforestation and forest degradation worldwide, and thereby contributing to a reduction in global deforestation; and (b) reducing the Union’s contribution to greenhouse gas emissions and global biodiversity loss...*), while coexisting with non-EUDR-compliant FRCs’ production practices across the globally dispersed sourcing geographies. So, I suggest reflecting on whether the market segregation entails a ‘failure of the regulation’ indeed? Or is it that the regulation has limits and cannot prevent certain behaviours outside its jurisdiction/scope/reach? The authors might consider stressing this feature as an inherent limitation in the policy design.
- Line 221. Would it be possible to offer some examples in terms of the penalties for misreporting?
- Line 168. Why not insert Figure 2 here?

Market segregation: Some minor comments for this pathway are listed next.

- Line 288. It seems there is a word missing here between “higher and (1),” would it be “when”? Or else, revisit the line describing point (1), as it reads somewhat strange at the moment.
- Line 317. Would it be worth clarifying the concept of ‘transaction cost’ to make it more accessible to certain audiences/types of readers? Or at least give a reference to seminal economics accounts of the concept and how it translates to agricultural and forest economics? This is not fundamental but could help for clarity.

Negative spillovers: Some minor comments for this pathway are listed next.

- Lines 417 to 422. The details on the Amazon Soy Moratorium should be updated, as the multi-stakeholder zero-deforestation commitment has already been put on hold and is close to being considered extinct. Also, this claim has no references at all.

Table 1: It would be recommended that the authors revise the table and make sure to add details to the ‘Conditions’ column content. Some of the cells read as incomplete; e.g., for arrow 3, mechanism

‘Laundering’, it reads ‘EU market share’... what type of market share? Low or high? It stems from the analysis text, but it could be clearer here. For arrow 4, the precision is made.

Typos and format:

- Line 118: remove P for Patrick Meyfroidt in the citation of his 2020 paper. Then correct the reference for the 2018 paper. Similar situation in lines 351 and 391.
- Lines 133 and 159: heterogeneous is misspelt.
- Line 431. There is an underscore after the word ‘while’; it seems to be a typo.

Looking forward to seeing this paper out very soon.

Best regards,

Dr [Paulina Flores Martinez](#)