

December 2024



Compliance Checker Company Profile



Ten potential noncompliance case studies linked to Cargill's soy, cocoa, and palm oil operations in Brazil, Côte d'Ivoire and Indonesia

Updated in
January 2025



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Executive summary

*This sustainability risk profile - on agribusiness company **Cargill** - is part of a series of four reports on key commodities producing and trading companies that will serve as input for AidEnvironment's **Compliance Checker**, an interactive case studies' Dashboard. This sustainability risk profile analyses Cargill's links to forest-risk commodities in the scope of the EU regulation on deforestation-free products (EUDR). The analysis maps Cargill's sourcing areas, its link to deforestation hotspots, and the location of assets and infrastructure linked to Cargill's commodities' imports into the European market, as well as linked downstream actors and creditors and investors. Key element of the report is the demonstration of ten potentially EUDR noncompliant **case studies on soy, palm oil, and cocoa linked to Cargill**. The report's case studies have been shared with Cargill for further engagement on 21 November 2024, and the company's response has been integrated into the report.*

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Cargill: Relevant forest-risk commodities

Cargill plays a significant role in global agricultural markets

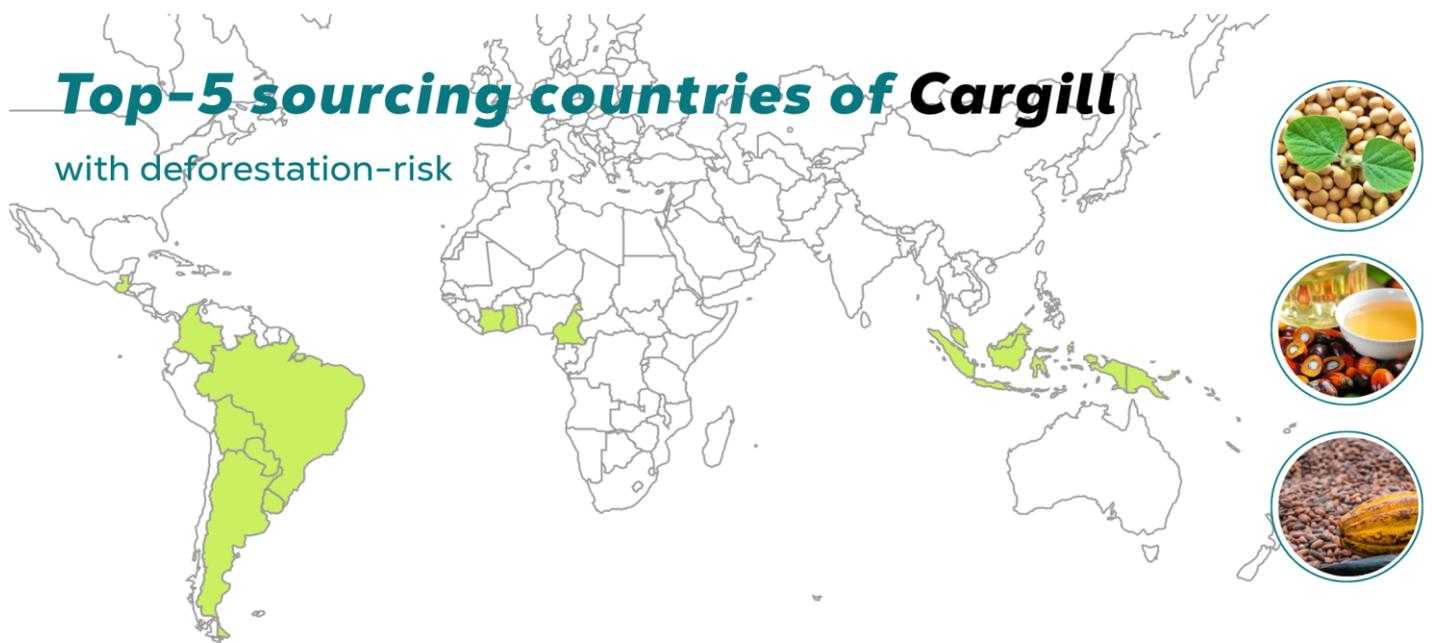
Cargill, founded in 1865 and headquartered in Minnesota (U.S.), is one of the largest privately held corporations in the world. The company operates in over 70 countries, employing approximately 160,000 people globally. Cargill's annual revenue for the fiscal year 2023 reached [USD 160 billion](#), underscoring its significant role in global agricultural markets.

Cargill operates four major [business segments](#):

- **Agriculture:** This segment involves the procurement, processing, and distribution of grains, oilseeds, and other agricultural commodities to producers of food and animal nutrition products, as well as products and services tailored for crop and livestock farmers.
- **Food:** Cargill supplies food and beverage manufacturers, food service providers, and retailers with ingredients, including meat and poultry products.
- **Financial:** Cargill delivers risk management and financial solutions to its global clientele in the agricultural, food, financial, and energy sectors.
- **Industrial:** This segment caters to industrial consumers of energy, salt, starch, and steel products. Cargill also focuses on the development and marketing of products derived from agricultural feedstocks.

Cargill's forest-risk commodities under the scope of the EUDR

Under the European Union Regulations on Deforestation-free Products (EUDR) scope of commodities, Cargill can be linked to the production, sourcing, and processing of **soy, palm oil, and cocoa** products (Figure below). Cargill [considers](#) the percentage of procurement spent on each of them confidential. The next sections will focus on Cargill's operations in soy, palm oil, and cocoa.



Beef	Cocoa	Coffee	Leather	Palm oil	Rubber	Soy	Wood
Cargill is involved in the processing of cattle products, but does not source from high-risk regions	<ol style="list-style-type: none"> 1) Côte d'Ivoire 2) Ghana 3) Cameroon 4) Indonesia 5) Brazil 			<ol style="list-style-type: none"> 1) Indonesia 2) Malaysia 3) Colombia 4) Guatemala 5) Papua New Guinea 		<ol style="list-style-type: none"> 1) Brazil 2) Argentina 3) Paraguay 4) Bolivia 5) Uruguay 	

Source: AidEnvironment, based on [Cargill CDP Forests 2023](#); [Cargill palm oil mill list 2023](#)

Figure 1. Cargill involvement (producing, sourcing, processing) in forest-risk commodities under the scope of the EUDR. Cargill is involved in processing in the cattle supply chain but [states](#) to “not source cattle from high-risk regions in 2022”.

Cargill: Relevant forest-risk commodities

Cargill's global commitment: deforestation-free commodities by 2030



While Cargill [did not meet](#) its 2020 midpoint deadline stipulated in the 2014 New York Declaration on Forests ([NYDF](#)), the company has committed to transforming all its agricultural supply chains to be free of deforestation by 2030, including protecting native vegetation beyond forests (Cargill [Policy on Forests](#), 2019; Cargill [soy policy](#), 2019).



"We have accelerated our commitment to eliminate deforestation and land conversion from our direct and indirect supply of row crops in Brazil, Argentina, and Uruguay by 2025. This is an important milestone in our global commitment of deforestation-free commodities by 2030." (Cargill, [annual report 2024](#))



More specifically, for the sourcing of Palm Oil products, Cargill has a "No Deforestation, No Peat and No Exploitation" (NDPE) [commitment](#) since 2014, where Cargill recognizes December 31, 2015, as the cut-off date for compliance.



In the cocoa sector, [Cargill's Cocoa Promise](#)[™] program is an initiative that promises to enable cocoa farmers and their communities to achieve better incomes and living standards while growing cocoa sustainably.



Cargill high-risk sourcing origins and assets for soy

Focusing on forest-risk countries, the vast majority of soybeans and soy derivatives Cargill processes and trades originate from **Brazil and Argentina**. Additional sourcing is mainly from **Bolivia, Paraguay and Uruguay**. While Cargill considers the percentage of procurement spent on soy confidential, Trase data (Figure 2) confirms the relevance of these deforestation-risk sourcing areas. Cargill sources soybeans predominantly for the production of animal feed, food ingredients, and biodiesel. Soymeal/cake and oil are used to feed livestock and poultry in Cargill's animal protein business.

Country	Cargill soy exports (t)	Year of export
Brazil	12.91 million	2020
Argentina	5.85 million	2019
Paraguay	1.38 million	2019
Bolivia	209,851	2021
Uruguay	No data	-

Figure 2. Cargill estimated soy exports from its top-5 sourcing countries. Source: [Trase](#), different datasets with various time frames.

South American countries are the most relevant to Cargill's soy-sourcing areas, among which Brazil presents the highest rate of native vegetation conversion to agriculture, especially in the Cerrado and Amazon biome. The Chaco biome, mainly covering part of Paraguay, Bolivia, and Argentina, has also seen considerable conversion of native vegetation into agriculture in the last 20 years, mostly driven by soy production. Cargill's assets in Brazil are visualised in Figures 3 (by Cargill) and 4 (by AidEnvironment)

Cargill in Brazil

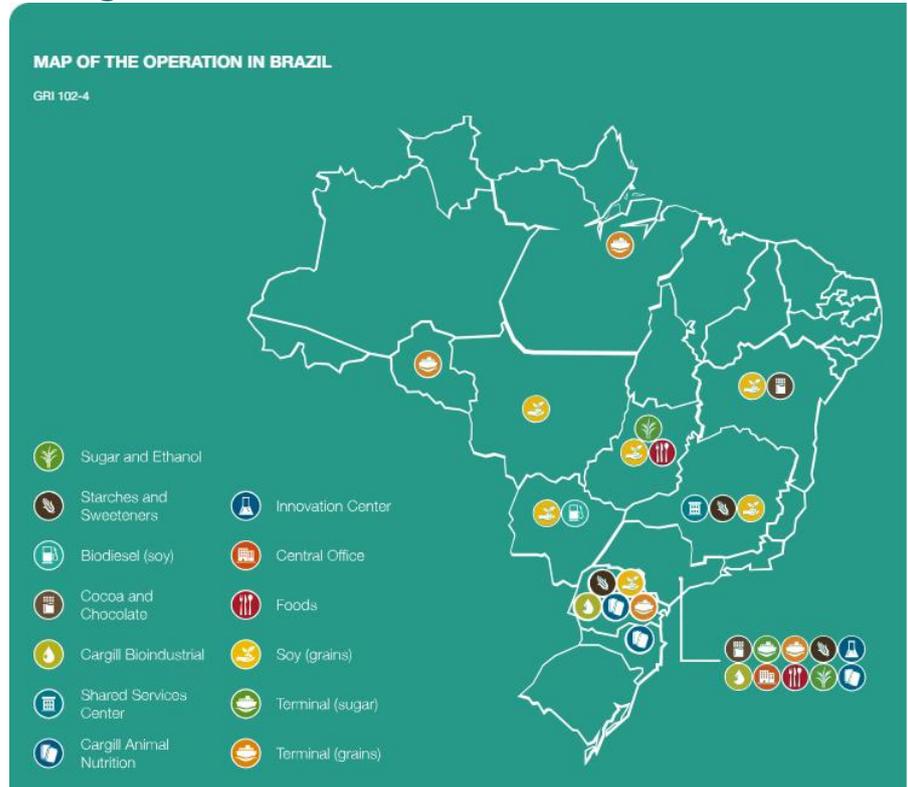
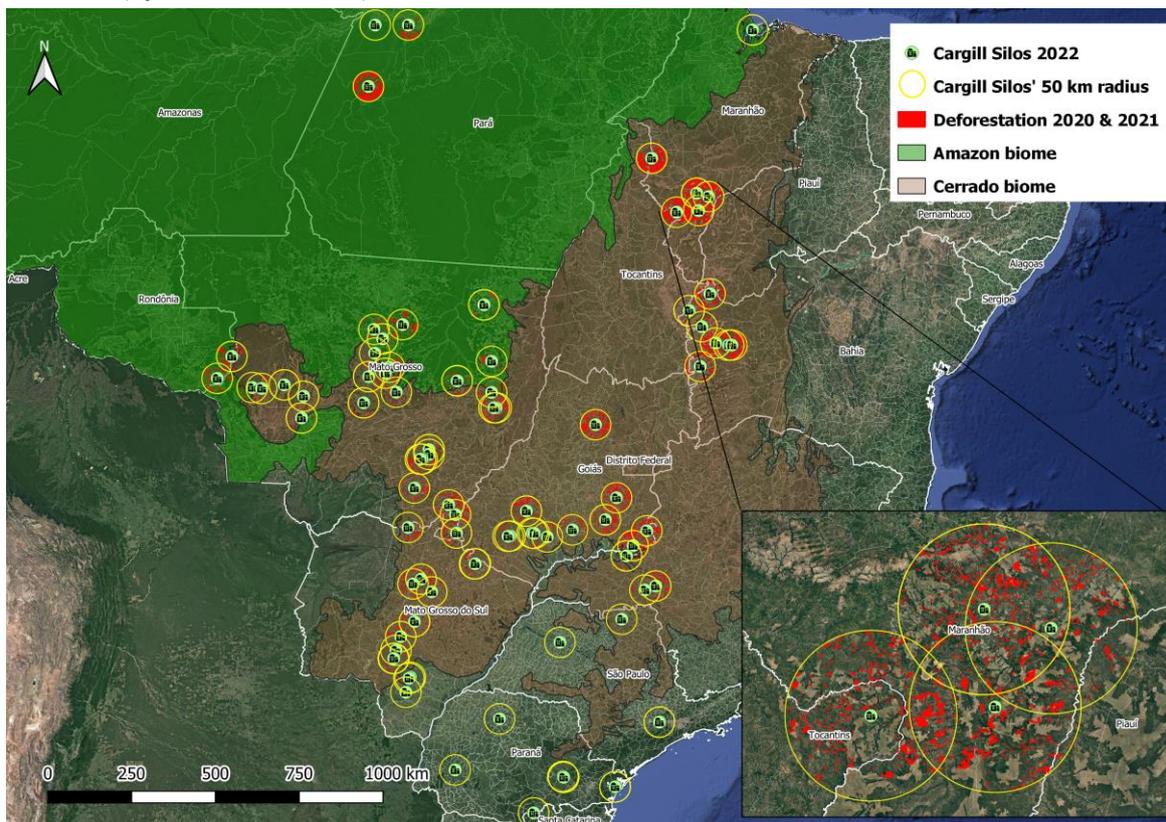


Figure 3. Cargill facilities and operations in Brazil. Source: [Cargill website](#), viewed in December 2024. In Brazil, the company is reportedly present in 17 Brazilian states and the Federal District through industrial units, warehouses, port terminals and offices in 147 municipalities.



Other than soy, the company's Brazilian operations also relate to sugar, ethanol, palm oil (in scope of EUDR), maize, cotton, edible oils, biodiesel, cocoa (in EUDR), and animal nutrition.

Figure 4. Cargill assets in Brazil linked to deforestation risk. The redder the colours in the radius around a silo, the higher the deforestation risk linked to Cargill's soy silo. Source: AidEnvironment, based on warehouse data (SICARM, 2022) and deforestation data (Prodes, 2020-2021). AidEnvironment uses a 50-radius approach around soy silos to estimate higher-risk sourcing areas of the company. Likewise, Cargill uses a "risk-calibrated approach" to identify areas at higher risk of unsustainable practices, including deforestation, peatland clearance and fires for palm oil mills (within a 50 km radius) and around soy silos (30 km, 50 km, or variable).



Cargill high-risk sourcing origins and assets for soy: the Ferrogrão railway project

Cargill is significantly involved in the Ferrogrão railway project, a highly controversial infrastructure initiative in Brazil. The Ferrogrão railway, also known as the "Grain Railway," is intended to facilitate the transport of soy and corn from the agricultural heartland in Mato Grosso (Sinop) to northern ports in Pará (Miritituba), thereby aiming to reduce transportation costs and enhance export efficiency. Cargill, along with other major agribusiness firms, is part of a consortium considering investments of about [USD 4.8 billion](#) in the Ferrogrão project. The project has sparked considerable opposition due to its potential environmental and social impacts. The railway would cut through sensitive regions of the Amazon biome, affecting Indigenous territories and conservation areas. Critics, including Indigenous groups like the Munduruku people, argue that the 993 km railway would [gravely violate](#) the rights of Indigenous people and local communities and devastate forested areas protected by these people.

In Figure 5 below a visualisation of Brazilian municipalities where Cargill was the leading soy exporter in 2020.

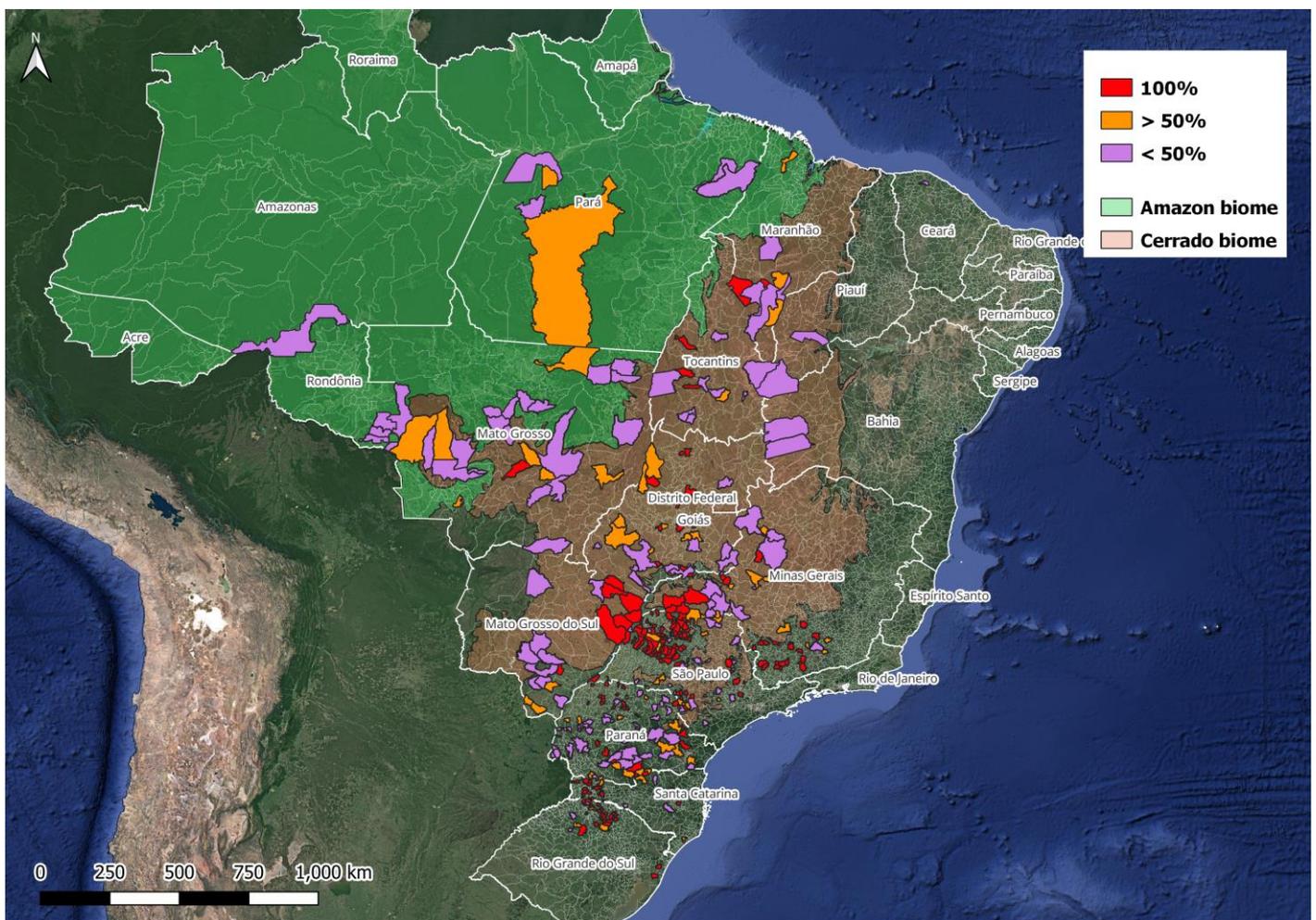


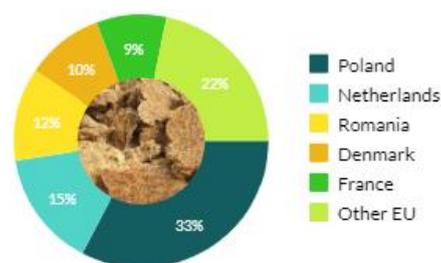
Figure 5. Brazilian municipalities where Cargill was the leading soy exporter in 2020 (in red those where Cargill was the sole exporter)
 Source: AidEnvironment, based on Trase Earth (latest soy data covers 2020). Cargill soy export volumes (tonnes) per Brazilian municipality of production (2020). Note that the map is not about absolute volumes exported by Cargill per municipality (see [Trase tool](#)) but it provides information on the monopoly position of Cargill as an exporter in those municipalities.



Cargill exports of soy products from Brazil and imports to the EU27

According to Seair Brazilian shipment data, between 2021 and 2023, Cargill exported **2.3 million metric tons (MT)** of soy oilcake/meal (HS 2304) to ten European countries and **2.2 million MT** of soybeans (HS 1201) to ten (partially different) EU countries. These volumes should be seen as a representative sample, which does not necessarily cover all traded volumes (a methods document can be shared on request). The sample of shipment data considered in the analysis did not reveal any Cargill exports from Brazil to the EU27 for the other two soy products under the scope of the EUDR: soybean flour (HS 120810) and soybean oil and its fractions (HS 1507).

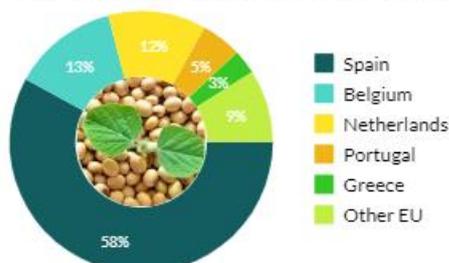
Cargill Brazilian Soy Oilcake (2304) exports to EU



EU importing country	Key EU importing operators
Poland	Cargill (15%), LDC (2%), Unknown (83%)
Netherlands	Cefetra BV (7%); Unknown (93%)
Romania	Cargill (5%); Bunge (5%); ADM (2%); Unknown (88%)
Denmark	Cargill (5%); DLG Group (1%); Unknown (94%)
France	Bunge (59%); LDC (2%); Unknown (39%)

Figure 6. Cargill as an exporter of Brazilian soy oilcake/meal to EU27 countries between 2021-2023. Source: AidEnvironment, based on Seair Brazilian shipment data for soy oilcake/meal (HS 2304) between 1 January 2021 and 30 November 2023, filtered for Cargill as an exporter. In the shipment data, only the following EU27 countries appear as importers of Cargill exports for the specific HS code: PL, NL, RO, DK, FR, SI, ES, DE, IT, and BE.

Cargill Brazilian soybean (1201) exports to EU



Top-5 EU importing country	Key EU importing operators
Spain	Cargill (3%), Unknown but Cargill is carrier (36%), Unknown (61%)
Belgium	Unknown but Cargill is carrier (81%), Unknown (19%)
Netherlands	Unknown but Cargill is carrier (27%), Unknown (73%)
Portugal	Unknown (100%)
Greece	Soya Mills (26%); Unknown (74%)

Figure 7. Cargill as an exporter of Brazilian soybeans to EU27 countries between 2021-2023. Source: AidEnvironment, based on Seair Brazilian shipment data for soybeans (HS 1201) between 1 January 2021 and 30 November 2023, filtered for Cargill as an exporter. In the shipment data, only the following EU27 countries appear as importers of Cargill exports for the specific HS code: PL, NL, RO, DK, FR, SI, ES, DE, IT, and BE.

There seems to be a significant discrepancy between Cargill's role as an exporter of Brazilian soy products to the EU27 and its role as an importing operator under the EUDR scope. By contrast, for cocoa products, there is a one-in-one correlation between Cargill's cocoa exports from Brazil and its imports in the Netherlands (see cocoa section). There is a completely different picture for soy, which is likely related to many unknown/non-registered records for Brazilian soy. Considering the analysed shipment data, while Cargill exported **2.3 million MT** of soy oilcake/meal (HS 2304) to ten European countries between 2021 and 2023, in the same period, the company only imported **336 thousand MT** of soy oilcake in five European countries. Very likely, Cargill's role as an importing operator in the EU27 is much bigger than the last number. However, many untransparent and unnamed records in the analysed shipment data of Brazilian soy show the company's leverage as an operator.

Cargill Brazilian soy oilcake (2304) imports in the EU

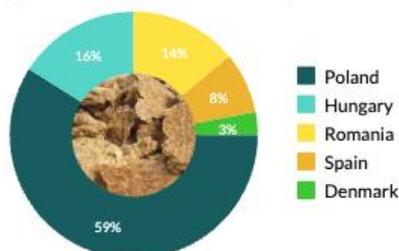


Figure 8 and 9. Cargill as importing operator of Brazilian soy oilcake (Fig 8 on the left) and Brazilian soybean oil (Fig 9 on the right) to the EU between 2021-2023. Source: AidEnvironment, based on Seair Brazilian shipment data for soy oilcake/meal (HS 2304) and soybean oil (HS 1507) between 1 January 2021 and 30 November 2023, filtered for Cargill as an importer in the EU. In the shipment data, only the following EU27 countries appear for the specific HS codes and inquiry: NL, PO, HU, RO, ES, and DK.

Between 2021 and 2023, considering the analysed sample of shipment records that name Cargill as an importer, the company imported **58 thousand MT** of soybeans (HS 1201) and **1.2 thousand MT** of soybean oil (HS 1507) in Europe. The soybeans' volume was all imported in Spain, and the soybean oil was mainly imported in the Netherlands (97%) and a small amount in Spain (3%).

Cargill Brazilian soybean oil (1507) imports in the EU





Cargill's downstream soy supply chain and investors mapping

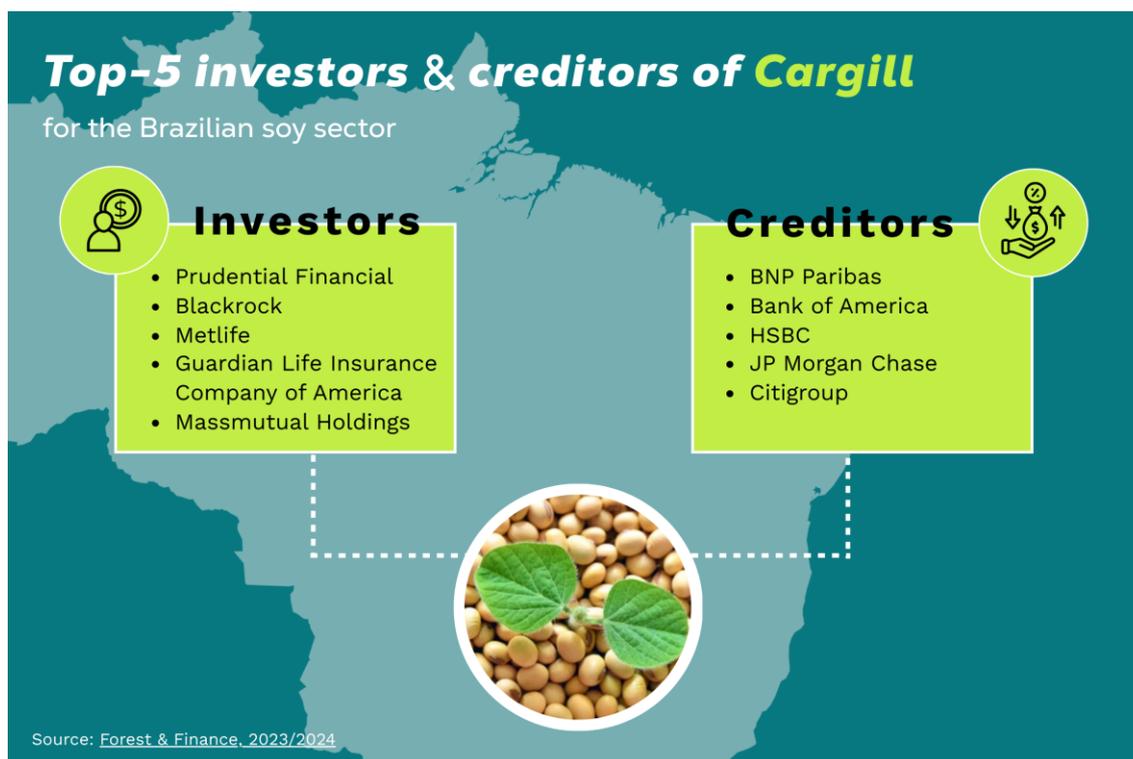


Figure 10. Top-5 Cargill's investors and creditors in the Brazilian soy sector in 2023-2024. Source: AidEnvironment, based on [Forest & Finance](#), 2023-2024

While Cargill does not publicly list its soy clients, the Tier-1 supplier lists of some of the large Fast Moving Consumer Goods (FMCGs) companies reveal several buyers linked to Cargill without details on geography (Figure 11). Many more links to downstream clients likely exist. FMCG companies such as Kelloggs, FrieslandCampina, Mondelez, General Mills, Upfield, Grupo Bimbo, BLC Global, ADM, Avon, BASF, Danone, Ferrero, KLK Oleo, L'Oréal, Mars, Olenex Holding, Oleon, Pepsico, PZ Cussons do not share any detailed information on their soy suppliers. More research would be needed to further explore anecdotal evidence and supply chain linkages.

Downstream company (type)	Details	Source
Unilever (FMCG) (2023)	Cargill Brazil is a direct supplier to Unilever. Indirectly, Soya Mills Greece is also linked to Unilever through Cargill (Unilever soy supplier list 2023). Shipment data reveals Cargill has supplied Soya Mills Greece between 2021-2023.	Unilever soy supplier list 2023; Seair Brazilian shipment data 2021-2023
Cefetra BV (parent: BayWa) (animal feed)	According to shipment data, Cargill supplies soy oilcake to Cefetra BV (Netherlands). Animal feed company ForFarmers is a subsidiary of Cefetra.	Brazil shipment data 2021-2023
Nestlé (FMCG)	Nestlé's soy supplier list reveals it receives soy from Cargill of production countries Brazil (Minas Gerais, Goiás, Mato Grosso), Hungary, Italy, Ukraine, Austria, Croatia, Romania, Serbia, Slovenia, Germany, Poland, India, Europe	Nestlé soy supplier list 2023
Royal De Heus Feed (animal feed producer)	Anecdotal evidence of Zembla documentary of 2021 reveals Royal De Heus is a recipient of Cargill soy	Zembla documentary 2021
Agrifirm (animal feed producer)	Anecdotal evidence of Zembla documentary of 2021 reveals Agrifirm is a recipient of Cargill soy	Zembla documentary 2021
Bunge, ADM, LDC (commodity traders)	Shipment data reveals that the large soy traders Bunge, ADM, and Louis Dreyfus Commodities all source from Cargill	Brazil shipment data 2021-2023

Figure 11. Downstream companies likely linked to Cargill. Source: AidEnvironment, based on supplier lists FMCGs; Seair shipment data 2023.





Six noncompliant soy case studies potentially linked to Cargill

Soy Cargill case	Name property	Owner	Location	Page
1	Fazenda Palmares	SLC Agrícola	Barreiras, Bahia (Brazil)	10
2	Fazenda Serra Grande	BrasilAgro	Baixa Grande do Ribeiro, Piauí (Brazil)	12
3	Fazenda Primavera I, II, III	Mateus Eduardo Gonçalves Viana & Marcelo Augusto Gonçalves Viana	São José do Xingu, Mato Grosso (Brazil)	14
4	Fazenda Tapera Grande	Irineu Orth	Correntina, Bahia (Brazil)	16
5	Fazenda Santa Cruz VIII	Indústria de Derivados da Mandioca Santa Cruz (Everli Ricardo da Cruz Rodrigues Carvalho, Nelson Ricardo da Cruz, Gelson Ricardo da Cruz)	Barreiras, Bahia (Brazil)	18
6	Fazenda Ad Rubi	Valdecir and Paulo Peteck	Santa Filomena, Piauí (Brazil)	20

Figure 12. Overview of soy case studies linked to Cargill in this company profile



Fazenda Palmeares



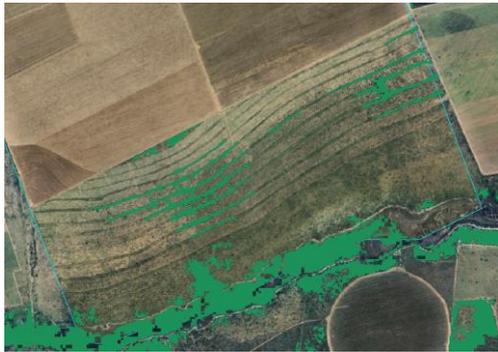
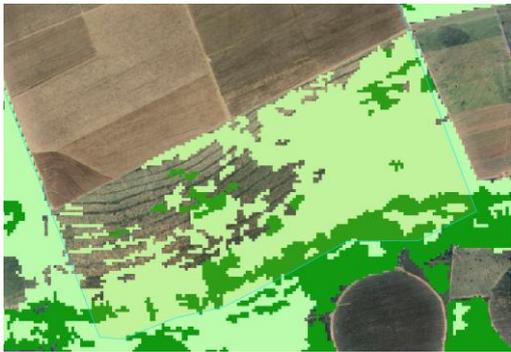
Location: Barreiras, Bahia
 Area property (ha): 33,975

Biome: Cerrado (Brazil)
 Coordinates property: -46.02455, -11.68089

Cleared Area			
140	hectares	Period clearance: 1 January – 30 September 2024	Type of vegetation: Woody grass savanna
6,981	tons of CO ₂		



Imagery: Limits of the property (photo 1, in blue). The red polygon in photo 1 highlights the total of 615 ha, an area of native vegetation burned in September 2022. Photo 2 shows the situation in September 2024, after the clearing of the strip of 140 ha in the previously burned area (photo 2, in white). Satellite imagery also shows signs of fires that have been occurring in the farm in 2022 (photo 3). Three photos on the bottom demonstrate the gradual removal of the native vegetation strip.



Imagery: Classification of native vegetation by Mapbiomas (left) - Native vegetation forest (dark green) and savannah (light green) - and EU Forest Observatory (right) - Native vegetation forest (dark green), demonstrating that part of the cleared areas can be classified as forest vegetation under the EUDR.

Source: Imagery ©2024 Planet Labs Inc.

Fazenda Palmares



Ownership & Business relationship

Owner:

Company responses

SLC Agrícola

- **SLC Agrícola:** “The clearing is part of a forest regeneration and enrichment project that began in 2023.” (October 2024)
- **Cargill:** Cargill states to do business with three of the identified soy farms of six soy case studies shared with Cargill in November 2024, including Fazenda Palmares. Cargill (6 December 2024): “We investigated the farms we do conduct business with; no irregularities were found on two of them and the third one remains under investigation”. Cargill does not further specify.

Environmental sanctions

Embargoes: No -

Environmental fines: No -

Case description

In 2021 and 2023, Cargill, Louis Dreyfus, ADM, and Amaggi appear as the main soy and cotton buyers of SLC Agrícola, a crop-producing and land investment company(1), and it is likely that Cargill is still a buyer of SLC Agrícola’s products in 2024. AidEnvironment’s real-time deforestation monitoring system has detected around 140 hectares of clearing in 2024 inside the SLC Agrícola’s farm, Fazenda Palmares, in Barreiras municipality, Bahia state, Brazil (2). SLC Agrícola/SLC LandCo owns and leases 16 properties in 6 Brazilian states, reportedly totaling 474,924 ha (3). The clearing occurred between January and September 2024, (thus after the EUDR cut-off date, and took place in a previously burned area reported by AidEnvironment in its RDM report #7 in November 2022 (4). At the time, SLC Agrícola stated that “the detected forest fires did not have a connection with deforestation or conversion of natural areas into crop-production areas”. However, two years later, there is evidence of clearance in those same areas in the southern part of Fazenda Palmares, of approximately 140 hectares. In response to these recent clearings detected by AidEnvironment, SLC Agrícola stated that the clearing is “part of a forest regeneration and enrichment project that began in 2023”. However, although the area was partially cleared by fire a few years ago, according to Mapbiomas (5) and the EU Observatory Forest map (6), the cleared area can be partly classified as native vegetation (forest), therefore, its clearance result in a noncompliance case with the EUDR. AidEnvironment considers it unlikely that native vegetation will be cleared as part of a forest regeneration project. Closer and longer-term monitoring is needed to prove whether this is a regenerative initiative or if the area will be used for crop production.

- (1) SLC Agrícola Management Report 2023, online: <https://api.mziq.com/mzfilemanager/v2/d/a975c39b-3eca-4ad8-9330-2c0a0b8d1060/28ee6f49-1833-ebea-e07a-00c04f8aaff9?origin=2>, viewed in October 2024.
- (2) SLC Agrícola website, online: <https://www.slcagricola.com.br/nossas-fazendas/fazenda-palmares>, viewed in September 2024.
- (3) SLC Agrícola website, online: <https://www.slcagricola.com.br/en/nossas-fazendas/>, viewed in October 2024.
- (4) AidEnvironment RDM 7 report, November 2022, online: https://aidenvironment.org/wp-content/uploads/2022/11/LIFE_RDM_Report_7_Nov_2022_UPDATED-1.pdf, viewed in October 2024.
- (5) Mapbiomas Brazil website, online: <https://brasil.mapbiomas.org/en>, viewed in October 2024.
- (6) EU Observatory Forest map, online: <https://forest-observatory.ec.europa.eu/forest/gfc2020>, viewed in October 2024.

Fazenda Serra Grande

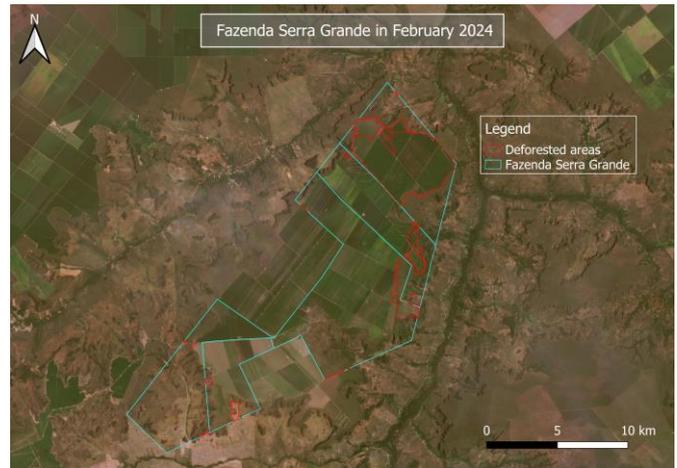


Location: Baixa Grande do Ribeiro, Piauí **Biome:** Cerrado (Brazil)

Area property (ha): 4,489

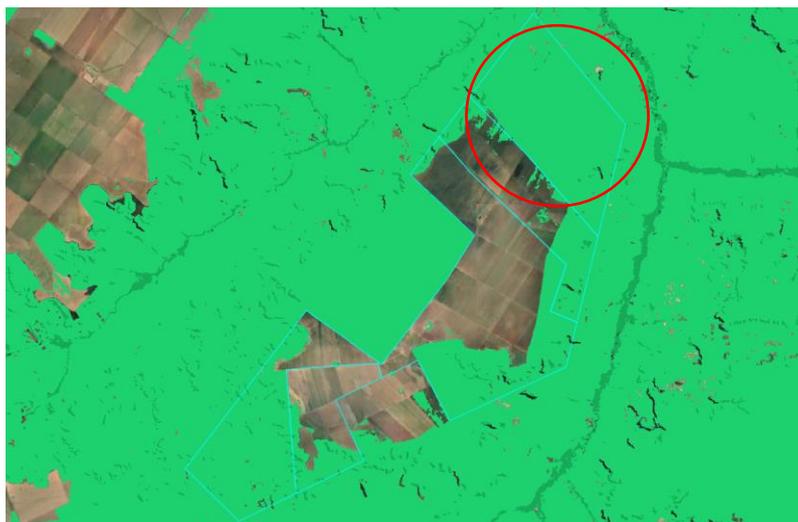
Coordinates property: -44.8704, -8.3520

Cleared Area			
3,333	hectares	Period clearance: 1 January 2020 – March 2024	Type of vegetation: Wooded savanna
166,572	tons of CO ₂		



Imagery: Before and after images Fazenda Serra Grande.

A total of 3,333 ha was cleared in BrasilAgro’s Fazenda Serra Grande between January 2020 and March 2024, as follows: 2,801 ha between Jan-July 2020; 434 ha in 2021; 7 ha in 2022; and 91 ha in 2023. *Source:* AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2024 Planet Labs PBC.



Imagery: In 2019 the cleared areas were still covered with native vegetation (used to be wooded savanna).

Source: Mapbiomas/Ministry of Environment (MMA)

Fazenda Serra Grande



Ownership & Business relationship

Owner:

Company responses

BrasilAgro

- **BrasilAgro:** No response (case shared with BrasilAgro on 11 November 2024).
- **Cargill:** Cargill states to do business with three of the identified soy farms of six soy case studies shared with Cargill in November 2024, including Fazenda Serra Grande. Cargill (6 December 2024): “We investigated the farms we do conduct business with; no irregularities were found on two of them and the third one remains under investigation”. Cargill does not further specify.

Environmental fines and embargoes

Embargoes: No -

Environmental fines: No -

Case description

In the first quarter of 2020, BrasilAgro, a publicly traded farmland investor and grain producer, concluded its merger with the farmland- investor company Agrifirma Brasil Agropecuária (1), and integrated Agrifirma’s farmland portfolio in its assets (2). This includes Fazenda Serra Grande, a 4,489-ha farm located in Baixa Grande do Ribeiro municipality in Piauí state, in Brazil (3). Agrifirma is a joint venture between Brasil Agronegócio FIP (4), a private equity fund managed by BRZ Investimentos, and Genagro, based headquartered in London (5). Brasil Agronegócio FIP invested BRL 160 million in this joint venture company (6). Between January 2020 and March 2024, a total of 3,333 hectares of native vegetation were cleared on the farm, of which 532 hectares after the EUDR cut-off date of 30 December 2020. BrasilAgro had a business relationship with Cargill in the clearing period. For instance, in June 2023, BrasilAgro reported that Cargill, Bunge, and Viterro were among its largest buyers of soybeans (7). In September 2022, BrasilAgro reported Cargill, Bunge and Cofco as its main buyers (8).

- (1) <https://br.investing.com/news/stock-market-news/brasilagro-tem-ganhos-apos-concluir-a-incorporacao-da-agrifirma-brasil-716695>;
- (2) <https://chainreactionresearch.com/the-chain-brasilagros-string-of-new-farmland-acquisitions-signal-ongoing-land-speculation/>;
- (3) <https://ri.brasil-agro.com/brasilagro/portfolio-de-propriedades/>;
- (4) <https://valor.globo.com/empresas/noticia/2011/09/06/mesmo-com-captacao-agrifirma-mantem-planos-de-ipo.shtml>;
- (5) <http://www.genagro.net/index.html>
- (6) http://www.mightyearth.org/wp-content/uploads/Rapid-Response_Soy-and-Cattle_Report-6.pdf;
- (7) BrasilAgro - Companhia Brasileira de Propriedades Agrícolas Quarterly Information (ITR) on June 30, 2023. Online: <https://vipfiles.valor.com.br/BDEmpresas/83847421-61b2-47f9-be6c-4f93a9831d85.pdf>, viewed in November 2024.
- (8) <https://api.mziq.com/mzfilemanager/v2/d/2c1e0dd9-31eb-4dc0-ab4d-844683600488/b06e6d93-7de0-f5cb-d84f-dea30fc539ec?origin=1>.

Fazenda Primavera I, II, III



Location: São José do Xingu, Mato Grosso

Biome: Amazon (Brazil)

Area property (ha): 10,056

Coordinates property: -10.6465, -52.1096

Cleared Area

1,491	hectares	Period clearance: March 2021 – August 2021	Type of vegetation: Intersection between Rainforest and Savanna
694,965	tons of CO ₂		

March 2021



August 2021



Imagery: Picture on the top left shows the situation in Fazenda Primavera I, II, and III in March 2021. The parcels in blue are registered under ownership of Mateus Eduardo Gonçalves Viana, while the yellow parcel of the total farm is registered under Marcelo Augusto Gonçalves Viana. In the top right image, the significant clearing of 1,491 hectares is visualised. On the bottom left and right images clear fires can be detected in the deforested areas, between 4 and 7 September 2024.



Source: AidEnvironment, Imagery ©2024 Planet Labs Inc; Sentinel; NASA fire alerts

Fazenda Primavera I, II, III



Ownership & Business relationship

Owners:

Mateus Eduardo Gonçalves Viana & Marcelo Augusto Gonçalves Viana

Company responses

Cargill: Cargill states to do business with three of the identified soy farms of six soy case studies shared with Cargill in November 2024, including Fazenda Primavera I, II, III. Cargill (6 December 2024): “We investigated the farms we do conduct business with; no irregularities were found on two of them and the third one remains under investigation”. Cargill does not further specify.

Environmental sanctions

Embargoes: No -

Environmental fines: No -

Case description

Fiscal records of 2021 (undisclosed source) indicate that Marcelo Augusto Gonçalves Viana, registered in nearby municipality Primavera do Leste in Mato Grosso, is one of the owners of the cleared farm parcels of Fazenda Primavera I, II, III. He is a relevant soy supplier of Cargill. The name of the farm remains undisclosed. According to the fiscal records, his relative Mateus Eduardo Gonçalves Viana is also a soy supplier to other large soy traders, including Bunge, Louis Dreyfus, and Amaggi. The location of the farm Fazenda Primavera (I, II, III) is situated within a 50-km radius around Cargill’s soy silo in São José do Xingu in Mato Grosso. Between March and August 2021, therefore after the EUDR cut-off date of 30 December 2020, the significant amount of 1,491 hectares of native vegetation, mostly rainforest (1, 2), were cleared on the farms. Recently, in September 2024, these cleared areas are being further prepared for agricultural purposes by using (man-made) fires, a typical practice in Brazil.

Besides deforestation, one owner of the farm is also tied to political issues. Reportedly, Mateus Eduardo Gonçalves Viana, who is the son of former congressman Zeca Viana, is under investigation by the Federal Public Ministry for blocking highways in response to the election polls for the presidency of Lula in 2023 (3).

(1) Mapbiomas Brazil website, online: <https://brasil.mapbiomas.org/en>, viewed in October 2024.
 (2) EU Observatory Forest map, online: <https://forest-observatory.ec.europa.eu/forest/gfc2020>, viewed in October 2024.
 (3) News article Olhar Jurídico, online: <https://www.olharjuridico.com.br/noticias/exibir.asp?id=51753¬icia=filho-de-ex-deputado-e-identificado-pelo-mpf-como-apoiador-de-manifestacoes-que-bloquearam-rodovias&edicao=1>, viewed in October 2024.

Fazenda Tapera Grande



Location: Correntina, Bahia

Biome: Cerrado (Brazil)

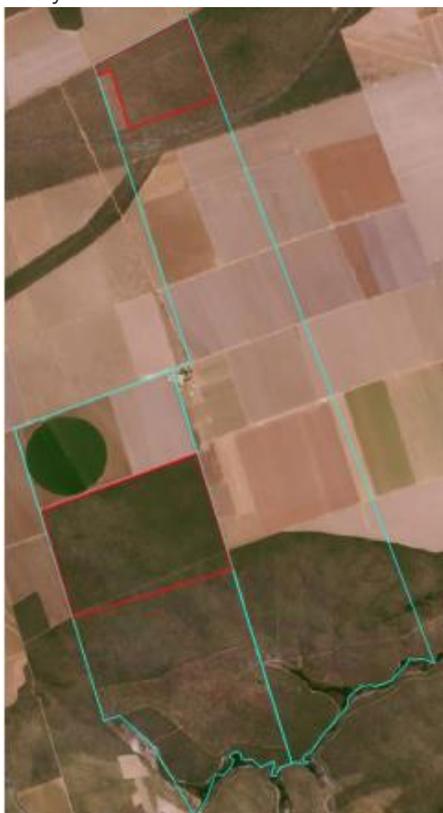
Area property (ha): 5,589

Coordinates property: -13.76711, - 45.81689

Cleared Area			
981	hectares	Period clearance: 30 December 2021 – 30 September 2024	Type of vegetation: Forested Savanna
126,110	tons of CO ₂		

July 2022

January 2023



About 542 ha of the native vegetation cleared area falls into the FAO Forest definition and is non-compliant with the EUDR

Source: AidEnvironment, Imagery ©2024 Planet Labs Inc.

Imagery: Picture on the left shows the situation in Fazenda Tapera Grande in July 2022. The property is demarcated by the blue lines, and the cleared areas are indicated by the red lines. In the image in the middle, the significant clearing of 981 ha of native vegetation since 1 January 2021 till September 2024 is visualised. In the image on the right, the green areas indicate the areas that are classified as forests under the definitions of the EUDR.

Fazenda Tapera Grande



Ownership & Business relationship

Owners:

Irineu Orth

Company responses

Cargill: Cargill states to do business with three of the identified soy farms of six soy case studies shared with Cargill in November 2024, including Fazenda Tapera Grande. Cargill (6 December 2024): “We investigated the farms we do conduct business with; no irregularities were found on two of them and the third one remains under investigation”. In January 2025, Cargill added: “We do source from Fazenda Tapera Grande, which has legal permits for the identified clearance.”

Environmental fines and embargoes

Embargoes:

No

-

Environmental fines:

Yes

11 environmental fines (total BRL 1.9 million)

Case description

Since the EUDR cut-off date (30 December 2020), Fazenda Tapera Grande has cleared 981 hectares of native vegetation, of which 542 hectares fall in the scope of the EUDR definition of forest, based on Mapbiomas Brazil (1) and the EU Observatory Forest map (2). In 2022, AidEnvironment detected 43 hectares of clearing in the property, of which 1 hectare falls in the scope of the EUDR definition of forest. In 2023, a clearance of 938 hectares of native vegetation was detected on the property, of which 541 hectares were in the scope of the EUDR definition of forest. Nevertheless, this case likely represents mostly legal clearing under Brazilian law since the property seems to have valid authorisation for clearing native vegetation. However, under the EUDR, part of the ‘legally’ deforested area would qualify as noncompliant as it's linked to the clearance of areas defined as forest formation by the EUDR. In June 2022, Irineu Orth, owner of the cleared farm, obtained authorisation for the vegetal suppression (or clearance) of 677 hectares at Fazenda Tapera Grande. Valid for four years, until May 2026, this license was issued by the government of Bahia (3). Cargill has a confirmed supplier-buyer relationship with this farm (see Cargill response above) and responded to a group of cases in AidEnvironment’s RDM report #12 (May 2023), which included a case reporting clearing in this farm: “Out of the 10 cases mentioned in the report, we have had recent negotiations with 3 of the farms mentioned, and in another case with the farmer/ group in a different farm. In all these cases, we have evidence of the legality of the clearance - that is currently aligned with our Soy Policy” [Cargill response to RDM Aidenvironment report of 2023 (4)].

Fazenda Tapera Grande is linked to a company with a similar name that is involved in the production of cattle, maize, soy, cotton, and timber (eucalyptus), as well as the production of animal feed. The Fazenda Tapera Grande property owner, Irineu Orth, is a large landowner, owning more than nine thousand hectares of land in different Brazilian states, such as Bahia and Mato Grosso (5). Relatives Afonso Orth, Daniel Orth, Douglas Orth, Daiza Orth, and Aline Orth Brum also own the company Fazenda Tapera Grande Ltda. Several environmental fines and embargoes are linked to these owners and Irineu Orth. For instance, 11 out of 13 detected environmental fines (total BRL 1.9 million) are associated with Fazenda Tapera Grande (Correntina - BA), with varying reasons such as unauthorised deforestation of native vegetation, prevention of regeneration of native vegetation or infringement of imposed embargoes (6). Irineu Orth, a former mayor of the Tapera municipality in Rio Grande do Sul state, became a Senator in April 2024, representing the same state (7). AidEnvironment has evidence connecting Cargill to supplier Irineu Orth in 2015 (8).

(1) Mapbiomas Brazil website, online: <https://brasil.mapbiomas.org/en>, viewed in October 2024.
 (2) EU Observatory Forest map, online: <https://forest-observatory.ec.europa.eu/forest/gfc2020>, viewed in October 2024.
 (3) Inema Bahia database, online: <http://www.inema.ba.gov.br/atende/licenciamento-ambiental/>, viewed in May 2023.
 (4) AidEnvironment RDM-report 12 (May 2023, updated in October 2023), online: <https://bit.ly/rdm12-may2023>, viewed in October 2024.
 (5) Combate racismo ambiental, May, 14, 2019, online: <https://racismoambiental.net.br/2019/05/14/mapa-das-terras-dos-parlamentares-mostra-que-eles-acumulam-fazendas-na-amazonia-e-no-matopiba/>, viewed in October 2024.
 (6) Ibama Brazil, online: <https://www.gov.br/ibama/pt-br>, viewed in May 2023.
 (7) Senadonoticias, 10 April 2024, online: <https://www12.senado.leg.br/noticias/materias/2024/04/10/ireneu-orth-toma-posse-como-senador>, viewed in October 2024.
 (8) Undisclosed source.

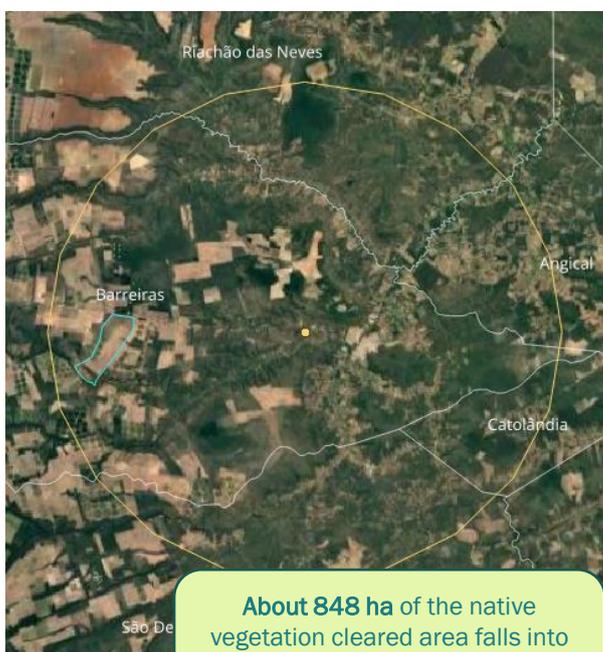
Fazenda Santa Cruz VIII



Location: Barreiras, Bahia
 Area property (ha): 6,284

Biome: Cerrado (Brazil)
 Coordinates property: -45.43772, -12.14622

Cleared Area			
4,783	hectares	Period clearance: Jan - April 2022 & Dec 2022 - April 2023	Type of vegetation: Savanna Park/ Wooded Savanna
239,038	tons of CO ₂		

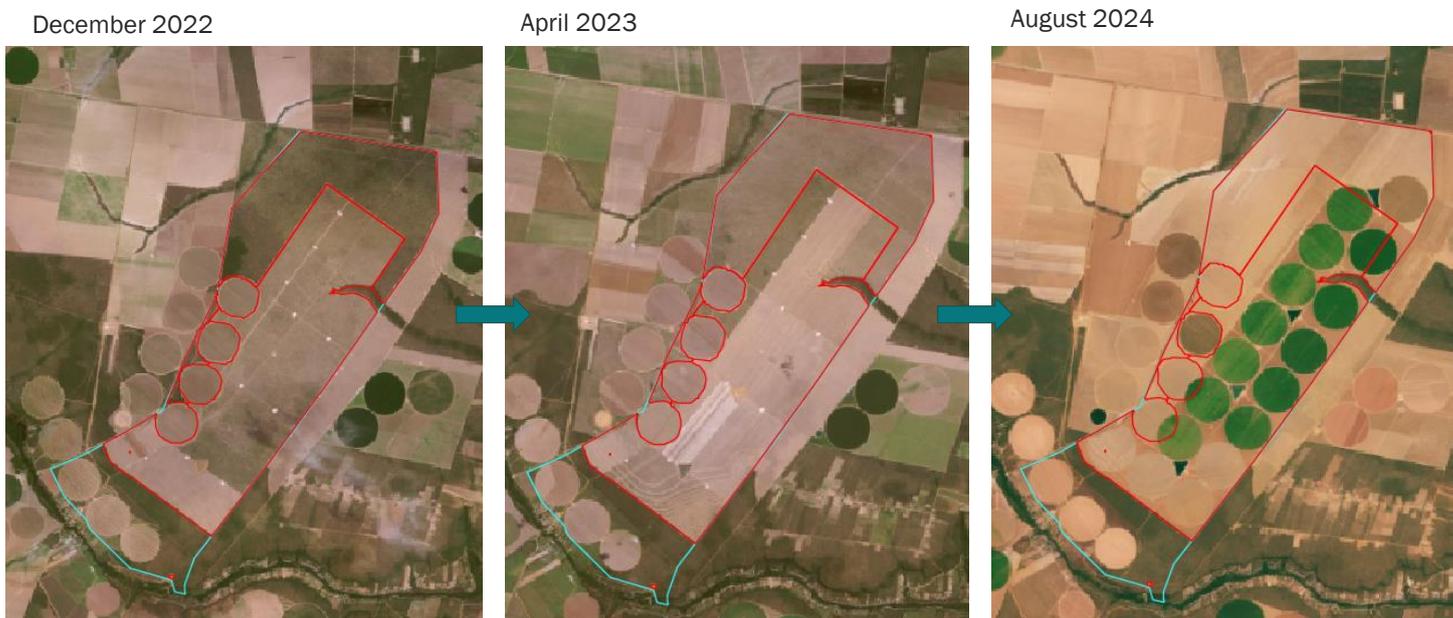


About 848 ha of the native vegetation cleared area falls into the FAO Forest definition and is non-compliant with the EUDR



Source: AidEnvironment, Imagery ©2024 Planet Labs Inc.

Imagery: Limits of the property (blue) limits of the cleared area (red). Pictures on the top right demonstrate the first clearing event between January and April 2022, when 3,130 ha were cleared on Fazenda Santa Cruz VIII in Barreiras (Bahia). The map on the top left shows how the farm is located within a 50-km radius around Cargill's silo (yellow dot) in Barreiras.



Source: AidEnvironment, Imagery ©2024 Planet Labs Inc.

Imagery: Pictures on the bottom demonstrate the second clearing event since the EUDR cut-off date: between December 2022 and April 2023, when another 1,653 ha were cleared on Fazenda Santa Cruz VIII. The August 2024 image on the bottom right clearly shows agricultural expansion on the previously cleared land.

Fazenda Santa Cruz VIII



Ownership & Business relationship

Owners:

Indústria de Derivados da Mandioca Santa Cruz (Everli Ricardo da Cruz Rodrigues Carvalho, Nelson Ricardo da Cruz, Gelson Ricardo da Cruz)

Company responses

Cargill: Cargill states to do business with three of the identified soy farms of six soy case studies shared with Cargill in November 2024, including Fazenda Santa Cruz VIII. Cargill (6 December 2024): “We investigated the farms we do conduct business with; no irregularities were found on two of them and the third one remains under investigation”. Cargill does not further specify.

Environmental sanctions

Embargoes:

No

Indústria de Derivados da Mandioca Santa Cruz received an embargo from Sema-MT due to the illegal deforestation of 371 ha in a farm located in Porto dos Gaúchos, MT, but the embargo was recently lifted (8).

Environmental fines:

No

-

Case description

In 2022, Cargill responded to alleged connections with Fazenda Santa Cruz VIII in an AidEnvironment Realtime Deforestation Monitoring (RDM) report (1) that they have “negotiations with one of the cases included in the [RDM June 2022] report”, “which is not on any of the embargo lists”. A 2023 list of Cargill suppliers in Barreiras municipality in Bahia state (2) indicates this farm, indeed, became a soy-supplying farm of Cargill in 2023. This is relevant information since, apart from the total clearing of 4,783 hectares in the farm since the EUDR cut-off date (30 December 2020), of which 848 ha may be classified as forest under the EUDR definition of forest, there might also be a legality issue at play linked to the owner of the cleared farm. The owner of Fazenda Santa Cruz VIII, the company “Indústria de Derivados da Mandioca Santa Cruz”, is involved in a land dispute with the “Associação dos Acampados da Gleba Boa Sorte”, representing a group of 200 families who revendicate the land tenure rights over a public area named “Gleba Boa Sorte” close by Cuiabá (MT) (3). The families have been living in the area since 2005 and are requesting the state government of Mato Grosso the landownership through the establishment of a rural settlement. In 2020, the company requested the ownership of the area to the Court of Justice (4), through which the company claims to own an area of 1,426 ha (5). A linked property in the same municipality, Fazenda Mata do Puba (Barreiras - BA), had authorisation for the clearance of 670 ha in 2018 - valid for 2 years (6). Deforestation in Fazendas Santa Cruz IV, V e VI was recently authorized (7), however, this would still represent noncompliance with the EUDR.

(1) RDM report June 2022 (updated in July 2022). Online: https://aidenvironment.org/wp-content/uploads/2022/06/Annex_3_LIFE_RDM_Report_3_June2022_UPDATED_July22.pdf

(2) Undisclosed source.

(3) <https://pagina12.com.br/cotidiano/2020/09/14/5445-por-que-uma-empresa-da-bahia-obteve-liminar-na-justica-para-despejar-200-familias-na-zona-rural-de-cuiaba>

(4) <https://www.rdnews.com.br/judiciario/conteudos/133708>

(5) <https://sistemadje.tjmt.jus.br/publicacoes/10633-2019%20C8%20Comarcas%20-%20Entr%C3%A2ncia%20Especial%20-%20Cuiab%C3%A1.pdf>

(6) <http://www.prefeitura.barreiras.mttransparente.com.br/admin/data/ATOOFICIAL270618061230.pdf>

(7) INEMA document, 21 October 2024.

(8) <https://geoportal.sema.mt.gov.br/>

Fazenda Ad Rubi



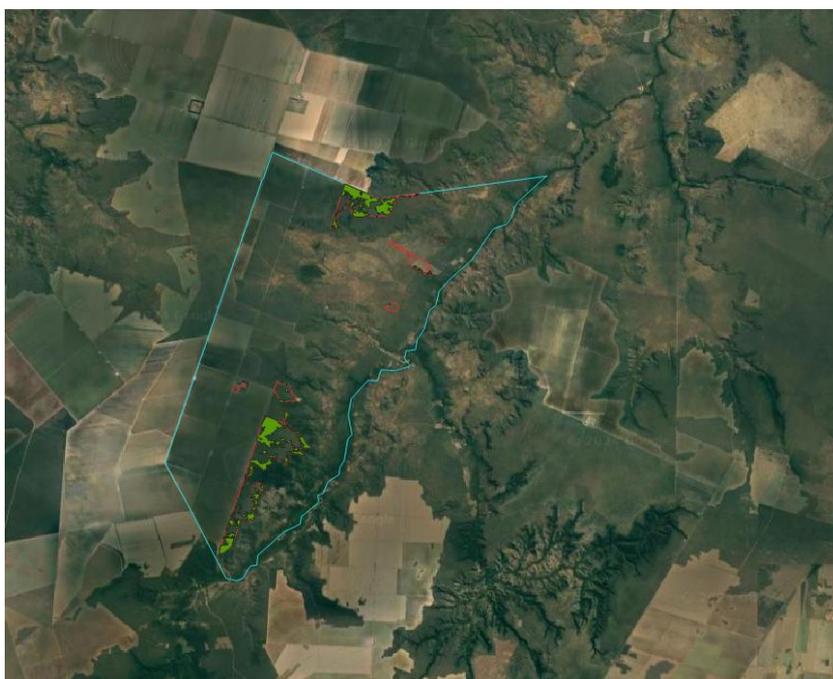
Location: Santa Filomena, Piauí

Biome: Cerrado (Brazil)

Area property (ha): 10,398

Coordinates property: -45.51726, -8.95622

Cleared Area			
2,783	hectares	Period clearance: December 2021 – December 2023	Type of vegetation: Wooded Savanna
139,085	tons of CO ₂		



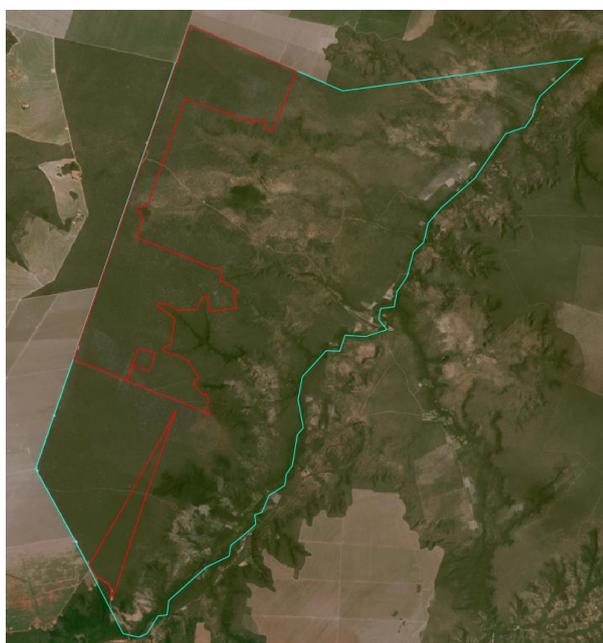
About 266 ha of the native vegetation cleared area falls into the FAO Forest definition and is non-compliant with the EUDR

Imagery: The red boundary represents Prodes 2023 deforestation areas while the green color shows areas that would classify as deforestation under the EUDR.

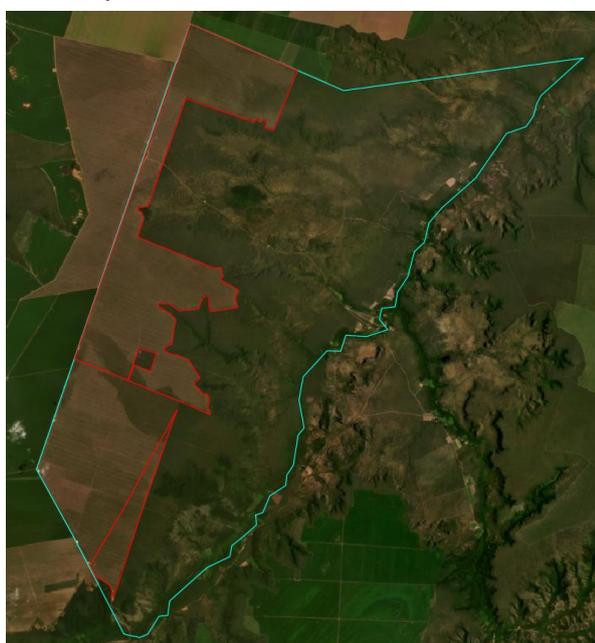
Source: AidEnvironment, Imagery ©2024 Planet Labs Inc.

Imagery: Picture on the bottom left shows the situation in Fazenda Ad Rubi in December 2021, while the bottom right picture shows the situation in February 2022.

December 2021



February 2022



Source: Imagery ©2021 Planet Labs Inc.

Source: Imagery ©2022 Planet Labs Inc.

Fazenda Ad Rubi



Ownership & Business relationship

Owners:

Former: Damha Agronegócios.
 Since 2020:
 Valdecir and Paulo Peteck

Company responses

Cargill: Cargill states to do business with three of the identified soy farms of six soy case studies shared with Cargill in November 2024, including Fazenda Ad Rubi. Cargill (6 December 2024): “We investigated the farms we do conduct business with; no irregularities were found on two of them and the third one remains under investigation”. In January 2025, Cargill added that “they do not do business with Paulo Peteck or Valdecir Peteck”.

Environmental sanctions

Embargoes: No -

Environmental fines: No -

Case description

In 2022, Cargill responded to alleged connections with Fazenda Ad Rubi in an AidEnvironment Realtime Deforestation Monitoring (RDM) report (1) that they have “negotiations with one of the cases included in the [RDM April 2022] report”, “which is not on any of the embargo lists”. Since the EUDR cut-off date of 30 December 2020, 2,783 ha of native vegetation was cleared on Fazenda Ab Rubi, of which 266 would be classified as forests under the EUDR forest definition. According to the Damha Agronegócio company website (2), former owner of Fazenda Ad Rubi, its main clients in Piauí are Bunge and Cargill. The website mentions the company’s farms Diamante, Esmeralda, and Safira, located in Baixa Grande do Ribeiro and Santa Filomena, as soybean and corn-producing areas supplying grain to traders such as Bunge and Cargill. The company also claims to own 30,384 hectares of land distributed in São Paulo, Goiás and Piauí, producing soy, corn, sugar cane, beans and cattle (3). In 2013 and 2014, Damha Agronegócios received loans from the Brazilian Development Bank (BNDES) through agricultural credit lines granted by Banco do Brasil and Banco Pine (4). The company's farm, Fazenda Bonança, in Pereira Barreto (São Paulo), is authorised to export fresh beef to the EU (5).

However, notarial documents show that Dahma Agronegócios sold Fazenda Ad Rubi to Valdecir and Paulo Peteck in 2020 (6), and it remains unconfirmed whether these owners and farm continued the business relationship with Cargill. In response to a draft version of this soy case study shared with Cargill in 2024, the company does not further specify if it is linked to this farm and its latest owners. Finally, a procedural summary linked to the processing of demarcation and title processes of indigenous and traditional territories in southern Piauí of 22 October 2024, indicates that there is a land conflict with traditional communities related to this farm and its owners Valdecir and Paulo Peteck (7).

(1) AidEnvironment RDM report April 2022. Online: https://aidenvironment.org/wp-content/uploads/2022/04/RDM_Report_2_April2022_UPDATED_July2022.pdf
 (2) Website Damha Agronegócio, online: <https://damhaagronegocios.com.br/pages/fazendas-do-piaui>, accessed October 2024.
 (3) Website Damha Agronegócio, online: <https://damhaagronegocios.com.br/pages/fazendas>, accessed October 2024.
 (4) BNDES data.
 (5) http://bi.agricultura.gov.br/reports/rwervlet?sisbov_cons&propriedades_aptas.rdf&p_nm_arquivo=propriedades_aptas.rdf&p_cs_aptas=S&foco_campo=&p_usuario=16614&p_flag=1&p_invoker=sisbov_ap_propriedades_aptas_rep&p_serial=44429639¶mform=no
 (6) Undisclosed source.
 (7) Undisclosed source.



Cargill high-risk sourcing origins and assets for cocoa

Cargill directly [sources](#) the vast majority of cocoa and cocoa products from five producing countries: **Côte d'Ivoire, Ghana, Cameroon, Indonesia, and Brazil**. While Cargill considers the percentage of procurement spent on cocoa confidential, Trase confirms Cargill's relevance as a cocoa trader in these deforestation-risk sourcing areas (Figure 1). Cargill [operates](#) "processing facilities for pressing cocoa and conching chocolate in the Netherlands, Belgium, France, Germany, Ghana, Côte d'Ivoire, and Indonesia." In Côte d'Ivoire, Cargill is [active](#) in cocoa sourcing activities, producing cocoa products including cocoa liquor, butter, cake and powder, and in cotton trading. Figure 2 visualises the locations of Cargill's linked supplying cocoa cooperatives in Côte d'Ivoire.

Country	Cargill cocoa exports (*1,000) (t)	Year of export
Côte d'Ivoire	297	2022
Ghana	73	2019
Indonesia	66	2020
Brazil	24	2017
Cameroon	No data	-

Figure 1. Cargill estimated cocoa exports from its top-5 sourcing countries. Source: [Trase](#), different datasets with various time frames.

Cargill in Côte d'Ivoire

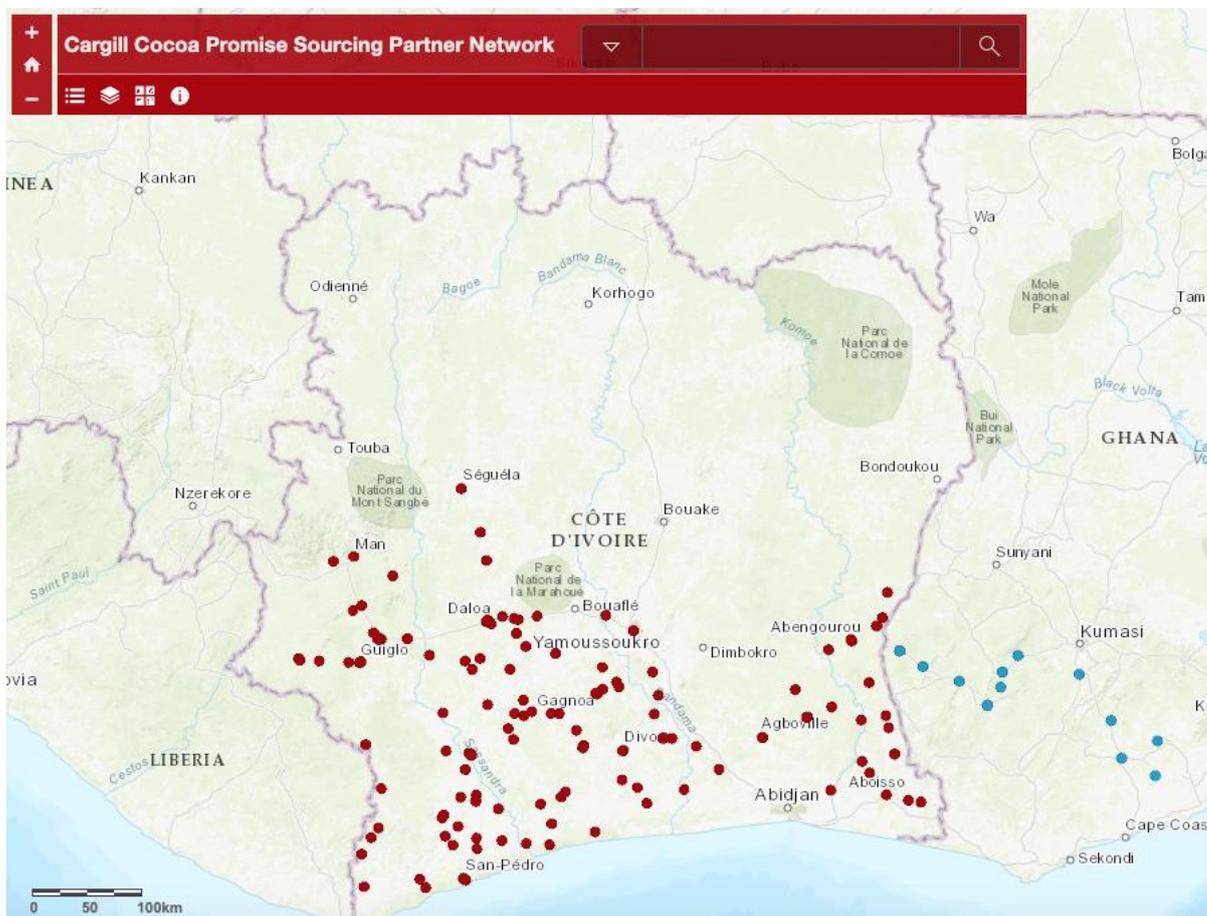


Figure 2. Partner farmer organizations (cooperatives) linked to Cargill in Côte d'Ivoire. Source: Cargill Cocoa Promise Partner [Network](#), 2024.





Cargill exports of cocoa products from Côte d'Ivoire, Brazil, and Indonesia and imports to the EU27

Côte d'Ivoire

According to Seair shipment data from Côte d'Ivoire between January 2021 and July 2024, Cargill Cocoa SARL (Abidjan) exported cocoa products with a CIF value of **799 billion** from Côte d'Ivoire to four European countries (Netherlands – 91%, France – 8%, Germany – <1%, and Belgium – <1%). Cargill BV (Netherlands) is the sole importing operator for the mentioned values of cocoa products (cocoa shells, husks, and skins - HS 1802; cocoa paste - HS 1803; cocoa butter, fat, and oil - HS 1804; cocoa powder - HS 1805; chocolate products - HS 1806), in these EU countries. There are no shipment records for cocoa beans (HS 1801), implying that Cargill probably processes cocoa beans before it exports them from Côte d'Ivoire.

Cargill Côte d'Ivoire cacao exports to the Netherlands

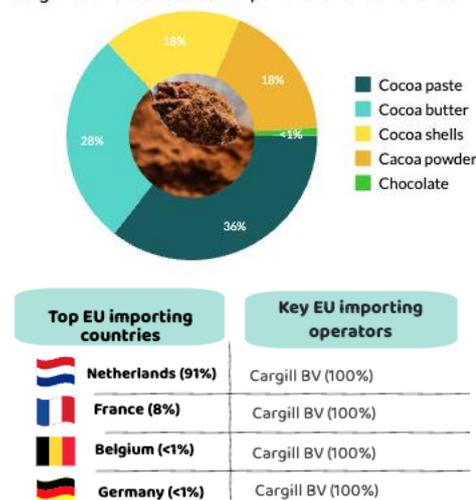
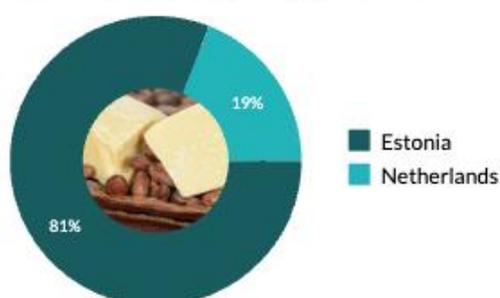


Figure 3. Cargill as exporter of Côte d'Ivoire cocoa products to the Netherlands between January 2021 - July 2024. Source: AidEnvironment, based on Seair Côte d'Ivoire shipment data for cocoa products (HS 1801 to HS 1806) between 1 January 2021 and 31 July 2024, filtered for Cargill as exporter to the EU. In the shipment data, only the following EU27 countries appear for the specific HS codes and inquiry: NL, FR, BE, and DE.

Indonesia

Cargill exported **1.4 thousand MT** of cocoa products, of which nearly 100% cocoa butter (HS 1804) from Indonesia to Europe between 1 January 2024 and 30 June 2024, the majority being shipped to Estonia (81%) and the Netherlands (19%). Cargill was also the sole importing operator in Estonia (81%) and the Netherlands (19%) for these volumes of cocoa products.

Cargill Indonesian cacao butter (1804) exports to EU



Brazil

According to Seair Brazilian shipment data between 2021 and 2023, Cargill exported **8.7 thousand MT** of Brazilian cocoa products to three European countries (Netherlands, Spain, and Belgium), of which nearly 100 percent can be linked to **cocoa powder** (HS 1805), and the remaining 0.4 percent to cocoa butter, fat, and oil (HS 1804) and cocoa beans (HS 1801). For cocoa shells, husks, and skins (HS 1802), cocoa paste (HS 1803), and chocolate products (HS 1806), no shipment records were identified for Cargill from Brazil to Europe between 2021 and 2023.

Cargill Brazilian cacao powder (1805) exports to EU



Figure 4. Cargill as exporter of Brazilian cocoa powder to the EU between 2021-2023. Source: AidEnvironment, based on Seair Brazilian shipment data for cocoa products (HS 1201 - HS 1206) between 1 January 2021 and 30 November 2023, filtered for Cargill as an exporter. Only for cocoa powder (HS 1805), significant exports of Cargill from Brazil to the EU27 were identified, of which 98 percent to the Netherlands, and the remainder to Spain (1%) and Belgium (<1%).

In its role as an importing operator, Cargill imports similar volumes of cocoa products from Brazil in the Netherlands between 2021 and 30 November 2023: **8.4 thousand MT** (nearly 100%) of cocoa powder (HS 1805), **26 MT** (0.03%) of cocoa butter (HS 1804); and **9 MT** (0.01%) of cocoa beans (HS 1801). There is no data on Cargill as an importing operator of cocoa product volumes from Brazil into Spain and Belgium in the indicated period.

Figure 5. Cargill as exporter and importer of Indonesian cocoa products to the EU between Jan-June 2024. AidEnvironment, based on Seair Indonesian shipment data for cocoa products (HS 1201 - HS 1206) between 1 January 2024 and 30 June 2024, filtered for Cargill as an exporter and importer.



For the cocoa forest-risk sector, there is no Forest & Finance data available on investors and creditors linked to Cargill.

Two noncompliant cocoa case studies potentially linked to Cargill

Cocoa Cargill case	Name property	Owner	Location	Page
1	Buying zone around cooperative	Cooperative COOPAAPROMA	Agnibilékrou, Comoé (Côte d'Ivoire)	25
2	Fazenda Sitio Sombra da Tarde	Maria da Assunção dos Santos Baches / Antônio Celestino dos Santos	Medicilândia, Pará (Brazil)	27

Figure 6. Overview of cocoa case studies linked to Cargill in this company profile

Cooperative COOPAAPROMA (archive)



Location: Agnibilékrou, Comoé

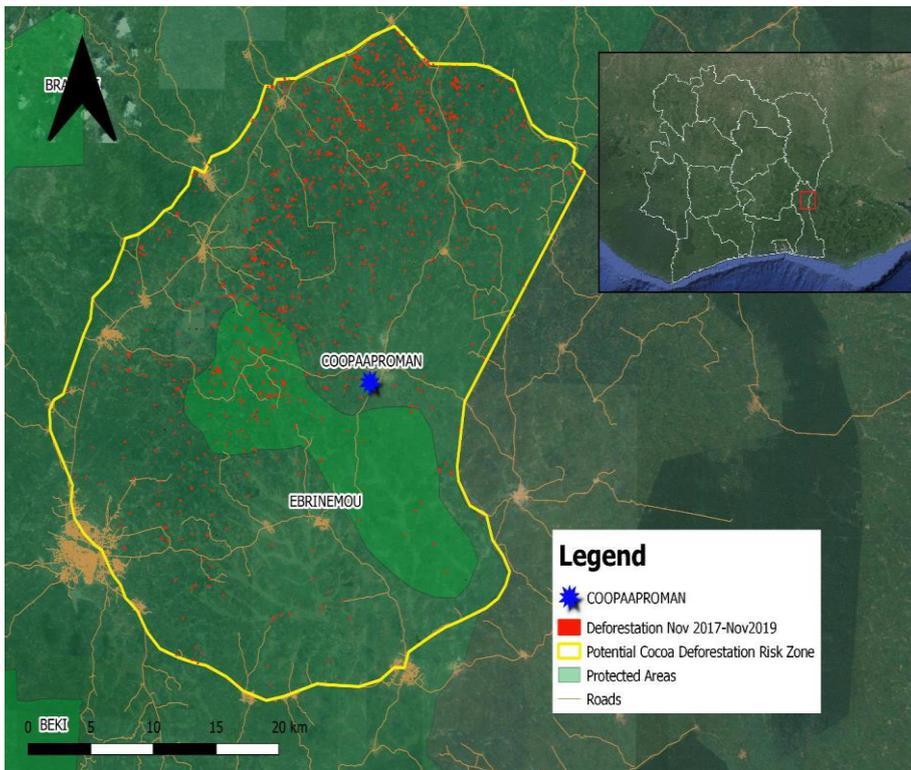
Biome: West African Coastal Forests & Savanna (Côte d'Ivoire)

Area property (ha): n.a.

Coordinates property: n.a.

Cleared Area

138	hectares	Period clearance: November 2017 – November 2019	Type of vegetation: Forest (but declassified as forest)
-	tons of CO ₂		



Imagery: Potential cocoa deforestation risk zone (in 2020) linked to Cargill supplying cocoa cooperative COOPAAPROMA in Agnibilékrou, Comoé (Côte d'Ivoire). Source: AidEnvironment, based on publicly available information for Côte d'Ivoire (e.g. administrative boundaries and roads), protected area information, and deforestation data from November 2017 until November 2019 from both Vivid Economics and Global Forest Watch GLAD Alerts. A 'cocoa-related deforestation risk zone' was calculated using the aforementioned deforestation alerts, the cooperative locations and the mapped road network in Côte d'Ivoire, assuming that average distance a cocoa bean travels is 25 km for a small cooperative (0-800 members), 35 km for a medium cooperative (800-1,000 members) and 45 km for a large cooperative (+1,000 members).

Map: Screenshot of Cargill Cocoa Promise program, indicating that cocoa cooperative COOPAAPROMA is an active supplier to Cargill.

Cooperative COOPAAPROMA (archive)



Ownership & Business relationship

Owner:

Company responses

Cooperative
COOPAAPROMA

- **Cargill:** No response to this specific case (case shared with Cargill in November 2024).

Sanctions and suspensions

Sanctions No

Suspensions No

Case description

In Côte d'Ivoire, Cargill sources from many cocoa cooperatives. One of them is the Coopérative Agricole Anouanze des Producteurs de Manzanouan (COOPAAPROMA) in Agnibilékrou, Comoé (Côte d'Ivoire) (1, 2).

Within the cocoa-related deforestation risk area for this cooperative, there was 138 ha of deforestation between November 2017 and November 2019, of which 15 ha took place between October 20 and November 13, 2019, after the launch the Cocoa and Forests Initiative (CFI) in 2017. COOPAAPROMAN is located in the village of Manzanouan in the department of Agnibilékrou. It reportedly has 564 members that in the 2017-2018 agricultural season produced 1,700 metric tons of cocoa from 2,993 ha of land (3). The cooperative is certified for cocoa by UTZ-Rainforest Alliance (RA) for 2,221 ha, with 521 ha reserved for conservation and 250 ha for other crops (ibid). Since 2015, with the help of Cargill, the cooperative has mapped out its member farms (ibid). According to the IUCN's protected planet database, the cooperative is located within a protected area with forests called Ebrinenou (4). Based on the GPS coordinates garnered from the RA 2019 audit, 75 percent of member producers' farms are located within the boundaries of Ebrinenou (3). Over time, this forest appears to have been declassified, and on January 5, 2017, SODEFOR's updated lists of forests classified by region did no longer refer to a forest named Ebrinenou (5).

(1) Mighty Earth & AidEnvironment Rapid Response special report on cocoa (January 2020). Online: https://www.mightyearth.org/wp-content/uploads/Final_RR-Special-Report-on-Cocoa_English-Version_January-2020.pdf, viewed in October 2024.

(2) <https://www.cargill.com/sustainability/cocoa/partner-cooperatives>, viewed in October 2024.

(3) <https://www.rainforest-alliance.org/business/certification/certificate-search-and-public-summaries/>, viewed in January 2020.

(4) <https://www.protectedplanet.net/en/thematic-areas/wdpa?tab=WDPA>, viewed in October 2024.

(5) http://www.sodefor.ci/pdf/List_fc.pdf, viewed in January 2020.

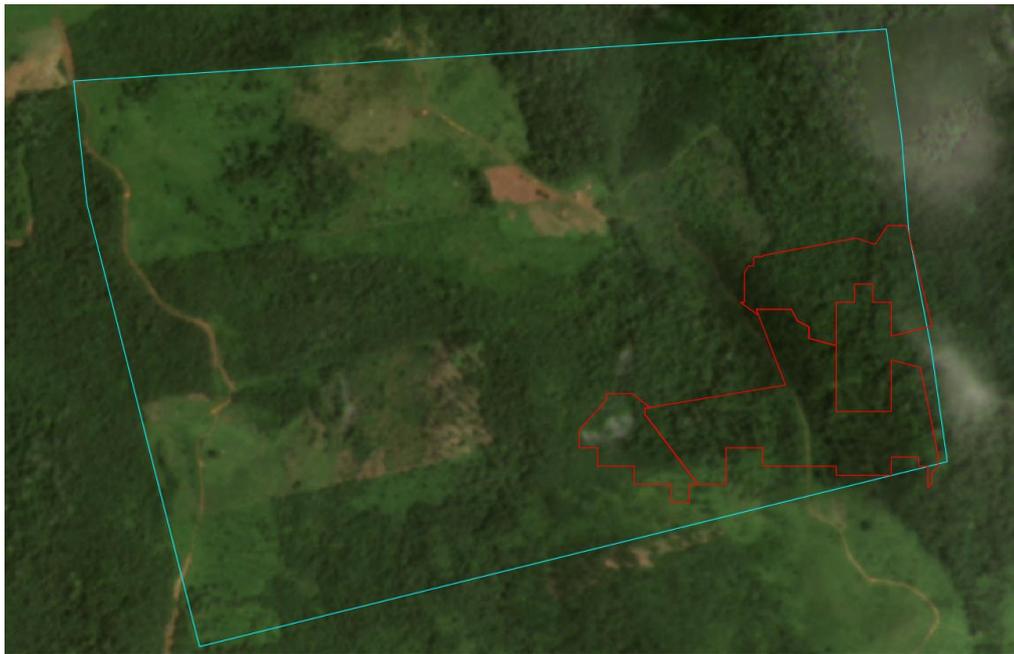
Fazenda Sitio Sombra da Tarde



Location: Medicilândia, Pará
Area property (ha): 430

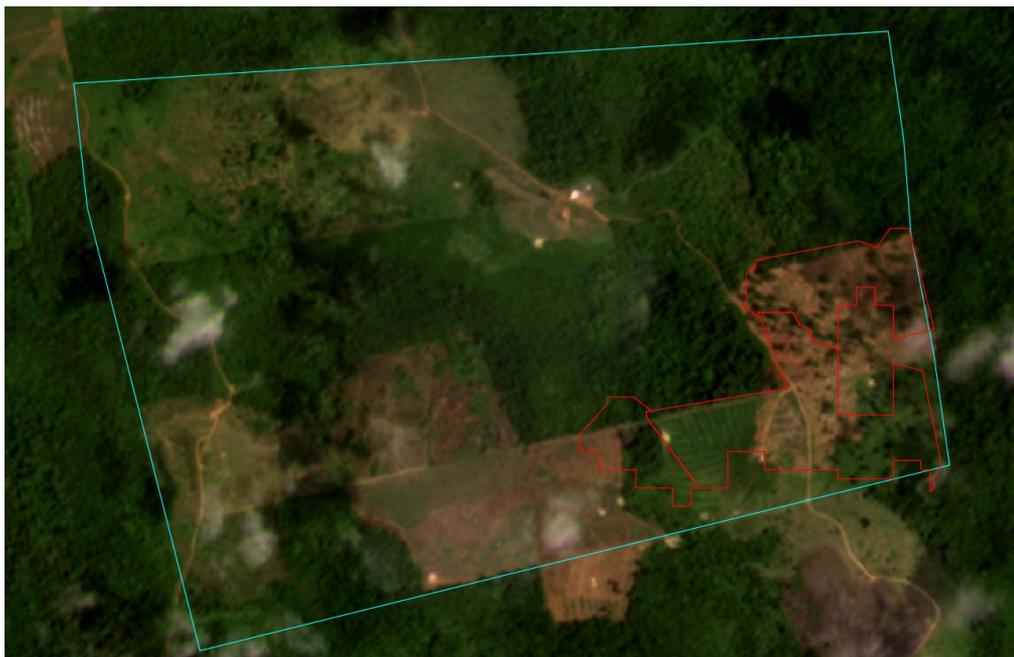
Biome: Amazon (Brazil)
Coordinates property: -3.5697, -53.0289

Cleared Area			
45	hectares	Period clearance: January 2022 – November 2022	Type of vegetation: Submontane Dense Humid Forest
25,575	tons of CO ₂		



Imagery: Before and after images Fazenda Sitio Sombra da Tarde.

Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF). Imagery © 2022 Planet Labs Inc.



About 43 ha of the native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**

Source: AidEnvironment, Imagery ©2022 Planet Labs Inc.

Fazenda Sitio Sombra da Tarde



Ownership & Business relationship

Owner: Maria da Assunção Dos Santos Baches	Company responses Cargill (6 December 2024): “We can confirm that the Sítio Sombra da Tarde Farm, owned by Antonio Celestino dos Santos and Maria Assunção dos Santos Baches, does not have, and has never had, commercial cocoa negotiations with Cargill”.
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Environmental and human rights sanctions

Conviction	Cargill was convicted in 2023 by a regional labour court for being linked to slave labour on property Fazenda Sitio Sombra da Tarde
Embargoes or fines	No

Case description

A total of 45 hectares were cleared in the property Fazenda Sitio Sombra da Tarde between January 2022 and November 2022, of which 43 hectares are classified as forests under the EU Observatory Forest Map, which would therefore be noncompliant with the EUDR (1). Also, according to the CAR declaration of the property (a mandatory declaration by the Brazilian Forest Code), the cleared area falls in the property’s declared Legal Reserves, presumably an area to be conserved with native vegetation (2). While AidEnvironment cannot confirm the growing of cocoa in the farm through the MapBiomias platform, there is evidence that Fazenda Sitio Sombra da Tarde in Medicilândia (Pará) cultivates cocoa and was, or still is, linked to Cargill. Cargill was convicted in 2023 by a first-level Labour Court for slave and child labour practices on its suppliers’ cocoa plantations in Brazil that were uncovered by Repórter Brasil (3). In the full decision of The Regional Labor Court of Judiciary Labor Justice it states that [translated from Portuguese]: “In 2010, at the Sombra da Tarde Farm, owned by Antônio Celestino dos Santos (PP 000630.2009.08.003/0), located in Medicilândia, an operation by the Mobile Group rescued 42 (forty-two) workers from conditions analogous to slavery, including three minors under 18 (eighteen) years of age, aged 11 (eleven), 12 (twelve) and 16 (sixteen), who helped their parents harvest cocoa, hired as “partners.”” (4). The “partnership contract” system used by the employer instead of an employment contract is considered “a mechanism to evade employees' labor rights”(5). The current registered owner of Fazenda Sitio Sombra da Tarde, Maria da Assunção dos Santos Baches, is potentially a relative of the convicted Antônio Celestino dos Santos.

(1) EU Observatory Forest map, online: <https://forest-observatory.ec.europa.eu/forest/gfc2020>, viewed in October 2024.
 (2) MapBiomias Alerta. Online: <https://plataforma.alerta.mapbiomas.org/>, viewed in November 2024.
 (3) Repórter Brasil (27/09/2023). Cargill convicted for neglecting slave and child labour at cocoa farms. Online: <https://reporterbrasil.org.br/2023/09/cargill-convicted-for-neglecting-slave-and-child-labour-at-cocoa-farms/>, viewed in November 2024.
 (4) Poder judiciário justiça do trabalho tribunal regional do trabalho da 5ª região 39ª vara do trabalho de salvador. ACPCiv 0000012-92.2021.5.05.0493.
 (5) CUT Brasil (29 June 2010), online: <https://www.cut.org.br/noticias/trabalho-infantil-e-escravo-e-flagrado-em-colheita-de-cacau-em-medicilandia-pa-9368>, viewed in November 2024.



Cargill high-risk sourcing origins and assets for palm oil

Cargill directly sources palm oil products from plantations in [eighteen countries](#), mostly in Southeast Asia and Latin America. In Indonesia, Cargill has four [company-owned](#) oil palm plantations (reportedly [82,435 hectares](#) in 2023): PT. Hindoli in South Sumatra; PT. Harapan Sawit Lestari, PT. Indo Sawit Kekal and Poliplant in West Kalimantan. Moreover, Cargill operates nine palm oil mills and three kernel-crushing plants in Indonesia, where they process Fresh Fruit Bunches (FFBs) from both, their own plantations and independent and smallholder farms. Additionally, Cargill manages 18 refineries across the globe, using palm oil and its derivatives to manufacture animal feed and various food ingredients.

There is a lack of data on the size of Cargill’s palm oil operations per specific sourcing country, although it is evident that Indonesia is the largest palm oil supplying country to Cargill. Moreover, based on an analysis of the latest [2023 palm oil mill list](#) of Cargill, AidEnvironment identified the following top-5 palm oil sourcing countries: **Indonesia, Malaysia, Colombia, Guatemala, and Papua New Guinea**, closely followed by Thailand, Honduras, and Mexico/Costa Rica (Figure 1). Figure 2 visualises the locations of oil palm concessions linked to Cargill in Indonesia.

Country	No. of mentions in palm oil mill lists of Cargill*
Indonesia	972
Malaysia	444
Colombia	31
Guatemala	16
Papua New Guinea	14
Thailand	10
Honduras	9
Mexico/Costa Rica	6

Figure 1. Cargill top palm oil sourcing countries. Source: latest 2023 [palm oil mill list](#) of Cargill. *Although this method is not systematic (there will be double counting involved, especially if the mill name involves the country name), nor does it give an overview of the number of mills or the volumes per country Cargill is sourcing from, it does provide a likely priority order of sourcing countries linked to Cargill.

Cargill in Indonesia

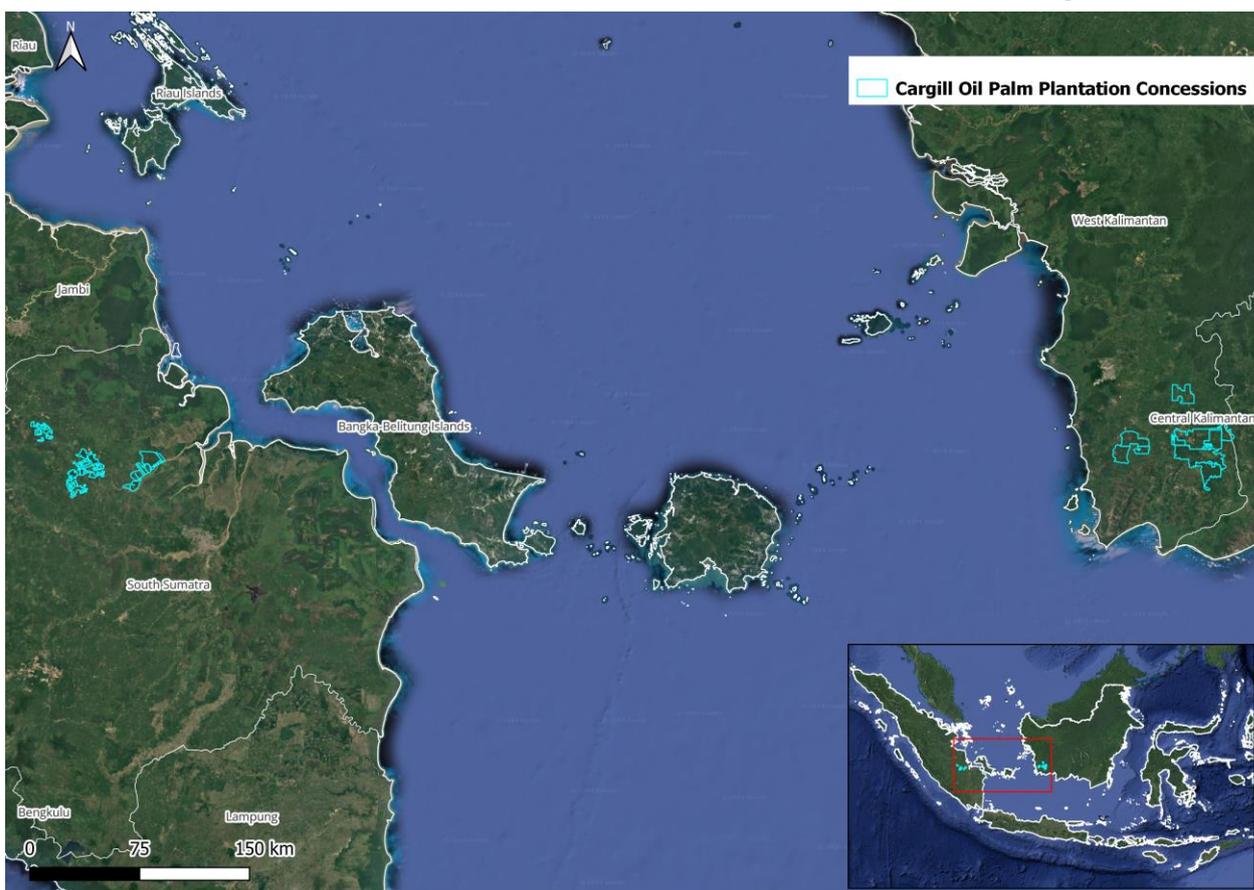


Figure 2. Cargill assets (oil palm concessions) in Indonesia. Source: AidEnvironment, based on oil palm concession data



Cargill exports of palm oil products from Indonesia and Brazil and imports to the EU27

Indonesia

Cargill seems to have played a modest role under its own name as a direct exporter of palm oil products from Indonesia to Europe in the short time span between 1 January 2024 and 30 June 2024 (recent shipment data from Indonesia is only available since January 2024). Nevertheless, this does not mean that Cargill is not involved as an exporter of palm oil products from Indonesia, as it will likely do so under the name of its subsidiary plantation companies. Indeed, from 1 January 2024 till 31 July 2024, PT Hindoli, a Cargill subsidiary in Indonesia, exported **16 thousand** metric tons of crude palm oil (HS 1511), of which the majority was shipped to Malaysia (12 thousand metric tons, of which 67% of the 12 thousand to Cargill Palm Products SDN BHD) and approximately 12 metric tons to Germany to the importer Institut Kirchhoff Berlin, a laboratory for food analysis.

The production of crude palm oil results in a large amount of palm oil mill effluent (POME), a palm oil-linked product (HS 23069090) that is not under the scope of the EUDR. Despite that and providing evidence on the relevance of expanding the product scope of the Regulation, in the first six months of 2024, PT Cargill Trading Indonesia has exported **4.3 thousand** metric tons of POME in bulk to Cargill NV with destination country Italy.

Other than exports, Cargill plays a more relevant role as an importing operator of palm oil products from Indonesia. In the first half year of 2024, the company imported **17 thousand** metric tons of palm oil (HS 1511) in Europe to Greece, Italy, and the Netherlands.

Cargill Indonesian palm oil (1511) imports in the EU

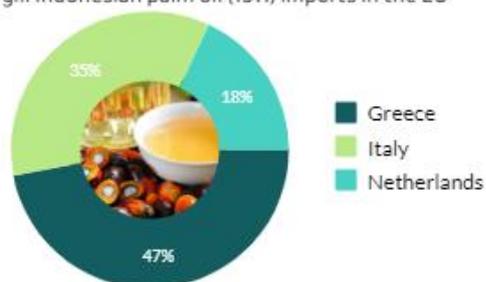


Figure 3. Cargill as importer of palm oil from Indonesia in the EU between Jan-June 2024. Source: AidEnvironment, based on Seair Indonesian [shipment data](#) for palm oil (HS 1511) between 1 January 2024 and 30 June 2024, filtered for Cargill as importer.

Cargill is also the EUDR importing operator for importing **3 thousand MT** of palm fatty acid distillate (HS 38231920) from Indonesia to Italy in 2024H1. This is 3% of all imports of palm fatty acid distillate being imported in Italy in this period, with AAA Oils and Fats, Wilmar, and Green Resources being the top-3 importers in this country.

Finally, Cargill acted as EUDR importing operator for **6 thousand MT** of palm kernel oil (PKO, HS 151329) from Indonesia in the EU27 between 1 January 2024 and 30 June 2024, all imported in the Netherlands. Cargill is the third largest importer of palm kernel and babassu oil and their fractions in the Netherlands in this period, with a share of 10% of the total volumes imported. Golden Agri (61%) and Intercontinental Oils and Fats (22%) are the largest two importers of this product in the Netherlands.

Brazil

Between 2021 and 2023, Cargill imported **7.7 thousand MT** of fatty acids, industrial, monocarboxylic; acid oils from refining (HS 382319) from Brazil to Europe (100% imported in Belgium). This is about one third of all imports of this product in Belgium in this period, with Cargill being the largest importer.



Cargill's downstream palm oil supply chain and investors mapping

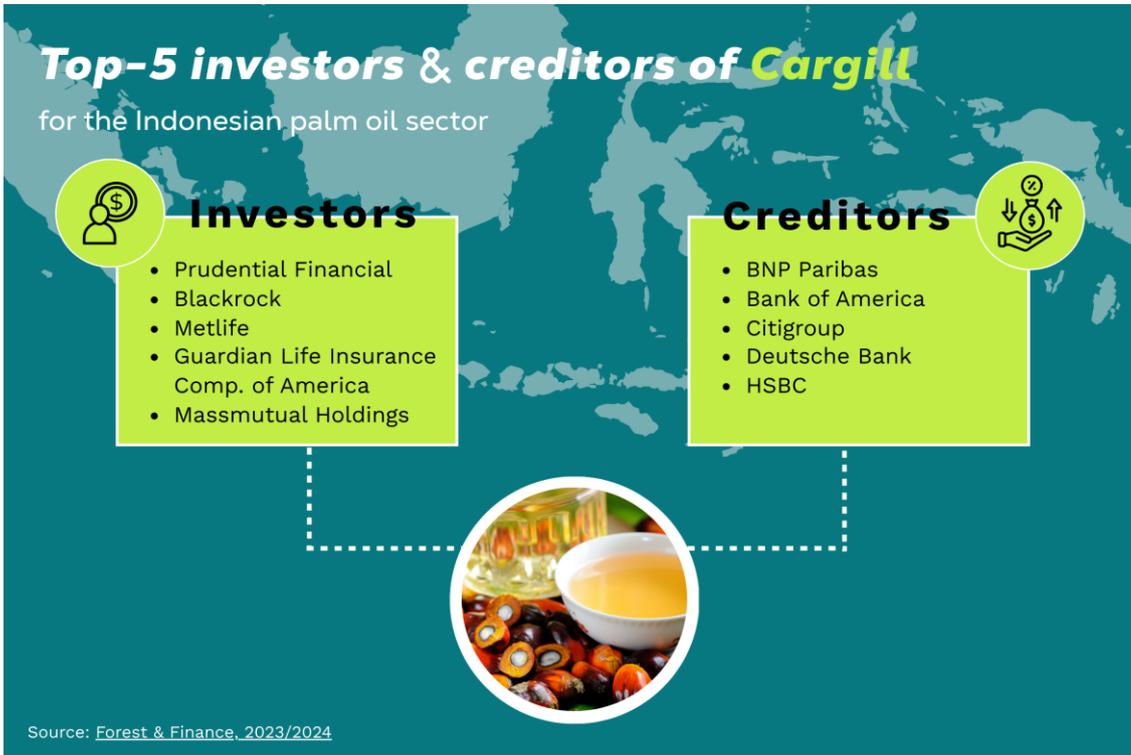


Figure 4. Top-5 Cargill's investors and creditors in the Indonesian palm oil sector in 2023-2024. Source: AidEnvironment, based on [Forest & Finance, 2023-2024](#)

Some of the largest global FMCGs list Cargill as a palm oil supplier in their public palm oil mill lists of 2022-2024, including [Danone](#), [Mars](#), [Ferrero](#), [BASF](#), [Nestlé](#), [KLK Oleo](#), [PepsiCo](#), and [Unilever](#).



Two noncompliant palm oil case studies potentially linked to Cargill

Palm Oil Cargill case	Name property	Owner	Location	Page
1	Agropalma Group	Alfa Group	Pará (Brazil)	33
2	PT Multipersada Gatramegah (PT MPG)	Musim Mas Holding	Bordering area of districts Laung Tuhup, Lahei Barat and Teweh Tengah; Central Kalimantan (Indonesia)	35

Figure 5. Overview of palm oil case studies linked to Cargill in this company profile



Location: Pará (Brazil)

Biome: Amazon (Brazil)

Area property (ha): 108,526

Coordinates: -2.5503, -48.7702

Properties

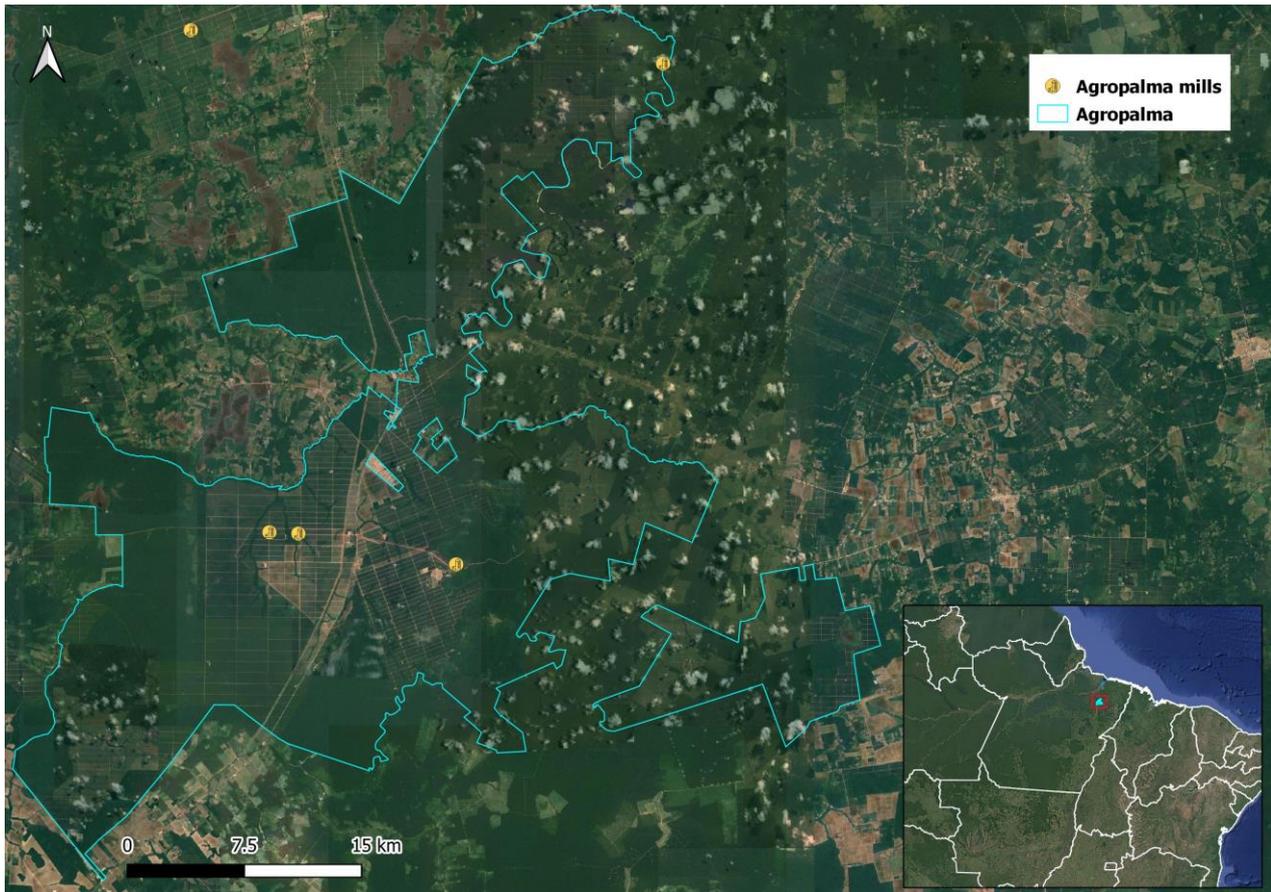


Figure: Palm growers' properties and palm oil mills linked to Agropalma in Pará, Brazil. Coordinates of largest property: 2.5503, -48.7702, which is 98,366 ha in size; coordinates of smaller property next to it on the right: -2.5944, -48.5085, which is 10,160 ha in size. Cargill was in 2021 connected to Agropalma, Brasil Biofuels (BBF), and Palmasa (based on public mill lists). While Cargill has suspended BBF from October 2022, Agropalma was still present in the latest palm oil mill lists of Cargill in 2023, while the company was linked to social impacts and was temporarily suspended by RSPO in 2023.

Agropalma profile

Agropalma is the largest exporter of Brazilian palm oil and exported around 15 percent of its production in 2021, mainly to Europe. The company, founded in 1982 in Tailândia (Pará) under the name Companhia Real Agroindustrial (CRAI), operates five palm oil mills in Pará, two refineries in Pará and São Paulo, and fractionation plants plus two fats and shortenings production units. Of the total 17,057 MT of palm oil shipped in 2020, Agropalma exported 90 percent, with Olenex (7,016 MT) and an unknown customer (7,050 MT), both in Germany, as its main clients. The majority of its production (85 percent) is destined for Brazil's domestic market. In the latest shipment data of 2023, Agropalma only exported 165 MT of palm oil products between 1 August 2023 and 30 November 2023 (might relate to the temporary RSPO suspension), of which 126 MT of crude palm oil to client Care Naturkost in Germany, and 39 MT of palm kernel oil to an unknown client in the U.S.

Agropalma is a wholly-owned subsidiary of the Alfa Group, a conglomerate with business segments in finance, hotels, retail, and construction. Agropalma was the only Brazilian palm oil producer selling palm oil certified by the Roundtable on Sustainable Palm Oil (RSPO).

Agropalma Group



Ownership & Business relationship

Owner:	Company responses
Agropalma	Cargill: The company stated (6 December 2024) that “Cargill is monitoring the implementation of Agropalma’s action plan to ensure compliance through the ART program. Agropalma is currently not part of our RSPO supplier list.”

Environmental fines, embargoes, and suspensions

Embargoes and environmental fines:	No	-
Suspensions	Yes	RSPO temporarily suspended Agropalma in February 2023 for being linked to fraudulent land titles in Pará (2)

Case description

Chain Reaction Research 2021 research on Agropalma (1), led by AidEnvironment, revealed that there was negligible deforestation linked to Agropalma’s oil palm plantations in Brazil till 2020. AidEnvironment’s updated screening on all Agropalma’s plantations (total size: 108,526 ha) in Brazil in April 2024 did not reveal any new deforestation since 2021 till March 2024. However, since the CRR publication in 2021, the company’s ESG violations and reputation risk continued to rise, cumulating in an RSPO suspension in February 2023 for being linked to fraudulent land titles in Pará (2). Conflicts with Brazilian communities have been an ongoing issue for Agropalma, as CRR reported in March 2021. A 2022 report from Agência Pública, a Brazilian investigative journalism organization, says that Agropalma’s operating areas has moved onto public lands, putting the company in conflict with local citizens and local communities (3). A court ruled that two of Agropalma’s farms had their registrations revoked because they overlapped with public lands. Similarly, the company has come under criticism in the past for its poor working and labor conditions on the company’s palm oil plantations. Several reports have documented labour issues at Agropalma’s facilities (4). Agropalma has been linked to slave labor in the past, with a well-known case (5) of an Agropalma outgrower, Altino Coelho de Miranda, appearing on a 2013-2015 blacklist for slave labor (6).

Agropalma is still present in Cargill’s palm oil mill lists of the second half of 2023 (7), while in that year the company was linked to social impacts and was suspended by RSPO. On November 2024, Agropalma appears as a certified member by RSPO (8).

- (1) <https://chainreactionresearch.com/6160-2>
- (2) Mongabay (29 March 2023), online: <https://news.mongabay.com/2023/03/rspo-suspension-of-brazil-palm-oil-exporter-tied-to-mongabay-land-grabbing-report/>
- (3) https://apublica.org/2022/08/com-inercia-do-governo-empresas-do-dende-avancam-sobre-terras-publicas-da-amazonia/?utm_source=akna&utm_medium=email&utm_campaign=19082022-ClimaInfo-Newsletter#Grilagem
- (4) <https://oabpa.org.br/index.php/artigos/5161-reais-condicoes-de-trabalho-emfazendas-de-cultivo-de-dende-no-para-giussepp-mendes>
- (5) <https://reporterbrasil.org.br/2012/12/denuncias-de-violencia-e-trabalho-escravo-envolvem-cultura-do-dende-no-para/>
- (6) <https://www.business-humanrights.org/fr/derni%C3%A8res-actualit%C3%A9s/brazil-rep%C3%B3rter-brasil-and-inpacto-publish-the-transparency-list-of-forced-labour>
- (7) <https://www.cargill.com/doc/1432132443976/cargill-palm-mill-list.pdf>
- (8) <https://rspo.org/search-members/certified-growers/>



PT Multipersada Gatramegah



Location: Bordering area of districts Laung Tuhup, Lahei Barat and Teweh Tengah; Central Kalimantan (Indonesia)

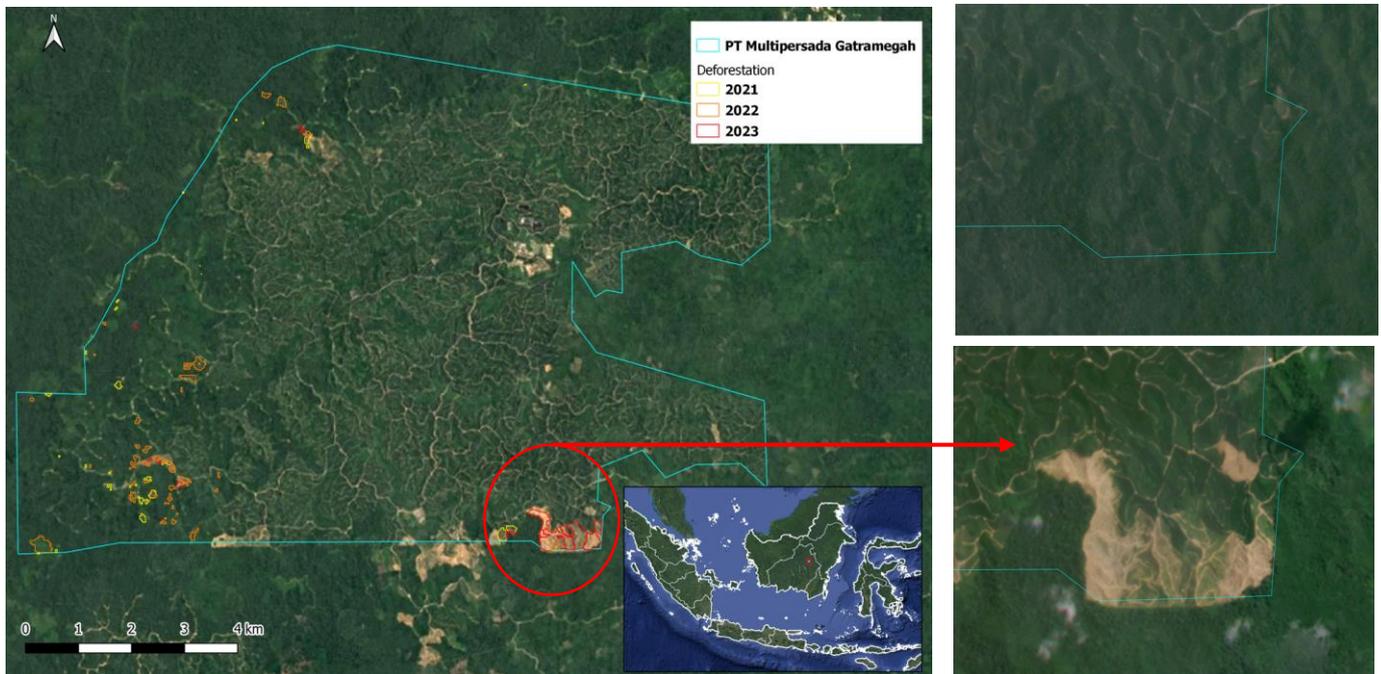
Biome: Borneo Tropical Forests & Sundaland Heath Forests (Indonesia)

Area property (ha): 9,339

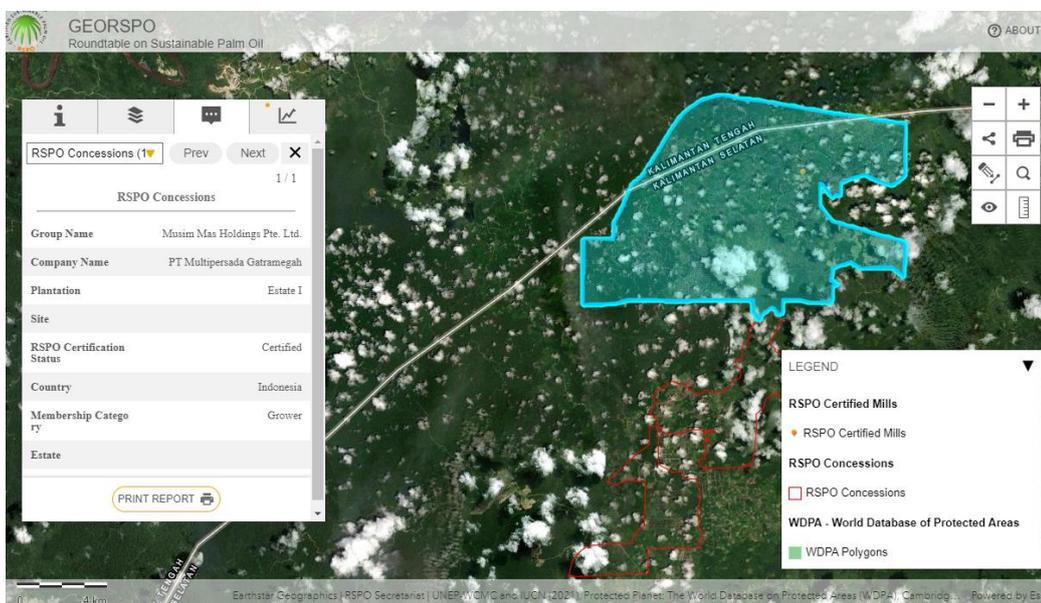
Coordinates: -0.7841, 114.72

Cleared Area			
99	hectares	Period clearance: 30 December 2020 – 30 September 2024	Type of vegetation: Secondary Dryland Forest
-	tons of CO ₂		

Imagery: The light blue lines show the concession area of PT Multipersada Gatramegah. The top image demonstrates deforestation of 99 ha between 2021-2024, with different colours for a breakdown of deforestation per year. The image on the bottom left shows a zoom on how the situation was in October 2021, while the picture on the bottom right demonstrates the situation in August 2023.



Source: AidEnvironment, based on Google satellite imagery, Hansen/UMD/Google/USGS/NASA, accessed through Global Forest Watch and AidEnvironment oil palm concession data.



Picture: Screenshot (15-10-2024) shows the concession area of plantation company PT Multipersada Gatramegah, that is a subsidiary of Musim Mas Holdings. Source: GEO RSPO, website assessed in October 2024.



PT Multipersada Gatramegah



Ownership & Business relationship

Owner:

Musim Mas

Company responses:

Cargill (6 December 2024): "PT MPG has verified through external assessments that the alleged deforestation of 99 ha was not High Conservation Value (HCV) or High Carbon Stock (HCS). PT MPG is not operating in forest area, as PT MPG is operating in the area categorized as Areal Penggunaan Lain (APL/Other Land-Use Purposes) based on their permit; therefore, this is not a case of deforestation. Furthermore, PT MPG confirms (11) it has obtained and complied with the legal permits in conducting its operational activities, including the nationally applicable regulations regarding environmental and social impact assessment (AMDAL) and waste management. In addition, PT MPG has clarified that they never prohibit community/employee/seller from bringing mobile phones in their transportation during the selling of their FFBs to their mill."

Environmental fines, embargoes, and suspensions

Embargoes and environmental fines:

No -

Suspensions

No -

Case description

AidEnvironment detected 99 hectares of native vegetation clearing in the concession of an oil palm plantation operated by company PT Multipersada Gatramegah (PT MPG), which is a subsidiary of Musim Mas Holding (1). The cleared area of 99 ha is classified as 'forest vegetation' according to MapBiomass (2) and the EU Forest Observatory map (3), while the Indonesian government's forest zoning system (KLHK layer) further specifies the cleared area as a 'Secondary Dryland Forest' (4). Therefore, contrary to statements of PT MPG/Cargill saying this "is not a case of deforestation", the cleared area covers forest vegetation, and would be noncompliant under the EUDR. Of the total of 99 hectares, 14 ha were cleared in 2021, 54 ha in 2022, and 31 ha in 2023. PT MPG is an RSPO-certified grower, with licences valid till March 2025 (5). A 2023 news article of the Kalsel Pos media (6) refers to several allegations of social impacts linked to PT MPG, including disregarding the impact of its activities and actions on local communities, the lack of an environmental management plan, and suspicion of violating the rules that apply to the mandatory Environmental Impact Analysis (AMDAL) activity program. PT MPG is also suspected of "having made it difficult for residents to enter the factory environment to sell palm oil from their plantations, by limiting and prohibiting employees or laborers and residents from bringing mobile phones in the transportation, this is because they are afraid that they will take documentation of the situation around the factory that does not comply with the management standards for its waste" [translated from Bahasa in English, ed.]. On the positive side, a March 2024 news article indicates that the company has repaired four connecting bridges in Karamuan Village (7), while a November 2023 article reports that PT MPG distributed rewards to four villages around the company concession that succeeded in preventing forest and land fires (8). There are no RSPO complaints recorded linked to PT MPG specifically. However, historically five RSPO complaints have been filed against Musim Mas Holding since 2017 (status: all closed) (9). Cargill is a confirmed buyer of the PT MPG palm oil mill in Kalimantan Tengah (10).

- (1) RSPO members and Geo RSPO, online: <https://rspo.my.salesforce-sites.com/membership/RSPOCertSearchPDF?auditType=Assessment+type...&cb=Certification+Body...&country=Country...&keywords=Multipersada+Gatramegah&SCModel=Supply+Chain+Model...&startDate=Start+Date...&status=Active>, viewed in October 2024; <https://rspo.org/as-an-organisation/tools/georspo>, viewed Oct. 2024.
- (2) Mapbiomas Indonesia, online: <https://mapbiomas.nusantara.earth/>, viewed in October 2024
- (3) EU Observatory Forest map, online: <https://forest-observatory.ec.europa.eu/forest/gfc2020>, viewed in October 2024.
- (4) Kementerian Lingkungan Hidup dan Kehutanan, online: <https://www.menlhk.go.id/>, viewed in October 2024.
- (5) RSPO certified members, online: <https://rspo.my.salesforce-sites.com/membership/RSPOCertSearchPDF?auditType=Assessment+type...&cb=Certification+Body...&country=Country...&keywords=Multipersada+Gatramegah&SCModel=Supply+Chain+Model...&startDate=Start+Date...&status=Active>, viewed in October 2024.
- (6) South Kalimantan Post, 24 June 2023, online: <https://kalselpos.com/2023/06/23/diduga-ada-kekutan-besar-di-balik-kegiatan-pt-multi-persada-gatramegah/>, viewed in October 2024.
- (7) Expos Kalteng (6 March 2024), online: <https://exposkalteng.com/pt-mpg-perbaiki-empat-jembatan-penghubung-di-desa-karamuan/>, viewed in October 2024.
- (8) Gemakalteng (12 November 2023), online: <https://gemakalteng.co.id/pt-mpg-berikan-reward-ke-empat-desaya-yang-berhasil-cegah-karhutla-di-wilayah-hgunya/>, viewed in October 2024.
- (9) RSPO-cases tracker, online: <https://rspo.my.site.com/Complaint/s/casetracker>, viewed in October 2024.
- (10) <https://www.cargill.com/doc/1432132443976/cargill-palm-mill-list.pdf>
- (11) [https://urldefense.com/v3/__https://kalselpos.com/2023/07/06/pt-mpg-klarifikasi-limbah-sawit-tak-cemari-anak-sungai-di-desa-karamuan/_:!!ETL5SZvLnA!6B63CxRK2ZGLecUK5t1iXnw-gPK-U2nUElfeeN9eB0JG3SHJbgQ0WM2elzKbA5DEERBS09-j6JLfJNjml_fyZPdkQ\\$](https://urldefense.com/v3/__https://kalselpos.com/2023/07/06/pt-mpg-klarifikasi-limbah-sawit-tak-cemari-anak-sungai-di-desa-karamuan/_:!!ETL5SZvLnA!6B63CxRK2ZGLecUK5t1iXnw-gPK-U2nUElfeeN9eB0JG3SHJbgQ0WM2elzKbA5DEERBS09-j6JLfJNjml_fyZPdkQ$)

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