## **Commodities' Supply Chain**

# Traceability Transparency

Key Geographies, Common Challenges, and Initiatives Cattle (beef and leather), Cocoa, Coffee, Palm oil and Soy



















### Introduction

In the context of the European Union Regulation for Deforestation-Free Products (EUDR), it is becoming increasingly important to share common challenges, barriers, and progress of existing initiatives aimed at strengthening transparency and traceability in commodity supply chains. In this context, it is also essential to recognize that traceability and supply chain transparency are not new concepts in commodity production systems, as they have been at the center of monitoring strategies linked to either legally binding agreements and regulations, private sector voluntary-based commitments, or certification schemes for decades.

The present report begins with a brief analysis of the most relevant products within five of the seven commodity groups covered by the EUDR, considering the EU's sourcing volume from non-EU countries with deforestation risk. For this, we use recent trade data from the EU Statistics, global commodity production data from FAO Stat, and global exporting data from UN Comtrade to rank the most relevant products within the commodity groups. After that, we present some common challenges related to traceability and transparency across all geographies and commodity groups. Finally, the analysis of traceability and transparency initiatives focused on key deforestation-risk countries supplying the EU with the most relevant products.

This report covers cattle (leather and beef), cocoa, coffee, palm oil, and soy but <u>does not cover</u> <u>rubber and wood products and derivates</u>.

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### **1.** Trade flows

#### Relevant products within the five commodity groups

The EUDR covers seven commodity groups comprising a total of <u>77 HS codes</u> (each referring to a specific product or group of products): beef & leather (10 codes), cocoa (6), coffee (1), palm oil (12), rubber (12), soy (4), and wood (32). However, when considering the EU's import volumes from non-EU countries, certain HS codes are particularly significant within each commodity group. Figure 1 highlights these key products for five groups—cattle (split into beef and leather), cocoa, coffee, palm oil, and soy. Rubber and wood HS codes are not included in this analysis.

According to 2023 <u>EU trade statistics</u>, within the cattle group, 'fresh or chilled beef' accounts for 62% of the imported volume in the EU among beef products, while 'tanned or crust hides' represent 64% of the imported volume within leather products. The top row of Figure 1 displays the products with the largest import shares in Europe for each commodity group.

#### Key global producers and exporters of the relevant products

For each of the highlighted products—those with the highest share of imported volume within the five commodity groups—there are key producing and exporting countries currently supplying the EU market. <u>FAO statistics</u> provide insights into the main production countries for these relevant raw products (see Figure 1). However, this data reflects only raw material production and does not account for processed items such as 'tanned or crust hides' or 'soy oilcake and meal'.

On the export side, <u>UN Comtrade</u> data highlights the top global exporters. Interestingly, some EU countries—such as the Netherlands, Italy, and Germany—emerge as major exporters despite not being primary producers. This is mainly due to their roles as re-export hubs, where imported goods are processed, repackaged, or refined before being exported again, often with added value (highlighted in red in Figure 1).

Products	9% <b>0201</b> Meat of cattle, fresh or chilled	64% 4104 Tanned or crust hides	63% Ø 1801 Cocoa beans	100% 0901 Coffee, whether or not roasted or decaffeinated	48% 7 1511 Palm oil and its fractions	2% 2304 Soy oilcake and meal
Production countries	USA Brazil China Argentina Australia	No FAO Data	Côte d' Ivoire Ghana Indonesia Ecuador Brazil	Brazil Viet Nam Indonesia Colombia Ethiopia	Indonesia Malaysia Thailand Colombia Nigeria	No FAO Data
Exporting countries	USA Netherlands Canada Poland Australia	Brazil USA Italy Argentina New Zealand	Côte d' Ivoire Nigeria Netherlands Malaysia Peru	Colombia Germany Uganda Honduras Italy	Indonesia Malaysia Thailand Guatemala Netherlands	Argentina USA Netherlands Bolivia Germany

Figure 1. The products with the higher imported volume in the EU from non-EU countries, global producers, global exporters

Source: AidEnvironment, based on raw data from <u>EU Stats (EU imports)</u>, <u>FAO Stat (production)</u>, and <u>UN Comtrade (exports)</u>. All production and trade data are from 2023, except for palm oil and its fractions (HS 1522), for which the most recent year of production data (FAO Stat) available is 2022.



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### **1. Trade flows**

#### European importers and supplying non-EU countries

To effectively implement deforestation-free regulations—such as the EUDR—it is essential to understand each EU member state's role in importing deforestation-risk commodities from producing countries. Mapping these trade flows helps identify critical intervention points to ensure compliance with the regulation's objectives. Using <u>EU trade statistics</u>, it is possible to trace the top five supplying countries for key commodities and match them to their primary EU importers (see Figure 2). The Netherlands, for example, consistently appears as the top importer of 'fresh or chilled beef', 'cocoa beans', 'palm oil and its fractions', and 'soy oilcake and meal'. Germany and Italy are leading importers of 'coffee', while Italy and Spain are major importers of 'tanned or crust' cattle hides.

To assess the environmental risks associated with these imports, Figure 2 also highlights (in red) countries with high deforestation risk—based on forest cover and deforestation rates reported in the FAO's 2020 Global Forest Resources Assessment. These countries are flagged even when deforestation is not directly linked to the specific product being traded, acknowledging broader systemic risks in land use and forest governance.

The percentages in Figure 2 indicate the share of each commodity group's import volume directly traded from deforestation-risk countries. For instance, all top five *direct* cocoa suppliers to the EU27 are considered deforestation-risk countries and together account for 89% of total cocoa imports. Similarly, for 'soy oilcake and meal', just three countries—Brazil, Argentina, and Paraguay—supply 85% of the EU's total imports, all three are also classified as deforestation-risk countries. Apart from these direct trade flows, products from high deforestation-risk countries may also be imported into the EU indirectly via third countries. For instance, there is evidence of Brazilian leather that is first being tanned in Vietnam, before entering the EU.

The concentration of supply from a few deforestation-risk countries **underscores the significant environmental footprint embedded in the EU's sourcing patterns**. It also highlights the importance of targeted engagement with specific trade partners and the need for traceability systems beyond country-level assessments to capture sub-national dynamics and supply chain segmentation.

Figure 2. European importers and top suppliers to the EU of relevant products by imported volume, highlighted in red the deforestation-risk supplying countries



Source: AidEnvironment, based on raw data from EU Stats (EU imports). All trade data are from 2023.

Traceability & Transparency Geographies, common challenges and initiatives in Cattle (beef and leather), Cocoa, Coffee, Palm oil and Soy



### 2. Common challenges

#### Plot of production

One of the EUDR's requirements is the geolocation of the 'plot of land' from which the product originates as part of the traceability requirement. The EUDR definition of 'plot of land' is: "land within a **single real estate property**, as recognized by the **law of the country of production**, which possesses sufficiently **homogeneous conditions** to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land" – <u>Article 2 (27)</u>.

However, the meaning of a 'single real estate property' can vary according to the 'law of the country of production.' For instance, an area currently used for cattle production (such as a pasture) may later be converted into a crop production area. It may also be possible that a single production license or concession covers several real estate properties and includes multiple plots of land. Figure 3 below exemplifies how a single real estate property can contain several different 'plots of land' based on the EUDR definition.



Figure 3. Definition of a 'plot of land' as a single economic unit under common management

Source: AFi Explainer: Assessing Compliance at the Production Unit Level (no date), accessed in March 2025.

Figure 4 shows a group of properties that, although registered as separate parcels under Brazil's official land tenure system (SIGEF), are all owned by the same person. In practice, these properties are likely managed as a single operational unit, with interconnected land-use change and agricultural production. However, if a crop is cultivated on the property to the left (highlighted in white), it is not officially part of the neighboring parcel with recent deforestation (highlighted in red). As a result, links between crop production and deforestation may be obscured in official records. These links need to be explored as part of an operator's due diligence, and the risk that products from nearby non-compliant plots are mixed in their supply chain must be ruled out.



Figure 4. A fragmented property under the same ownership

Source: AidEnvironment based on SIGEF and Deter\_data.



### 2. Common challenges

#### "Laundering practices" to circumvent illegalities

Another widespread challenge in environmental compliance is the existence of mechanisms designed to circumvent detection of illegalities, often referred to as "laundering practices." These practices are used to bypass legal frameworks or regulations, making the operations in a producing plot appear compliant, or a product appear to have been legally produced, even when they are not. These laundering techniques highlight the complexity of addressing illegal environmental activities, as they create loopholes that allow non-compliant practices to persist despite regulatory frameworks in place.

One example of such laundering practices can be seen in Brazil, where the Environmental Rural Cadastre (CAR) is used as a tool to circumvent environmental restrictions. It is important to note that the CAR is not a proof of land ownership; rather, it is a self-declared boundary required by Brazil's Forest Code, to outline the environmental conditions of rural properties. While the CAR is a useful tool for monitoring land use, it can also be exploited to mask illegal activities.

Figure 5 shows a property on the right where the original CAR from 2019 (highlighted in purple) overlaps an area that was later embargoed due to environmental violations (highlighted in red). In 2020, the same CAR declaration was resubmitted, removing the embargoed area from the document. On paper, this change made the property appear to comply with the Forest Brazil Code. even though the property had an embargoed area due to noncompliance with environmental laws.



Figure 5. A property with two versions of a CAR declaration, from 2019 and 2020.

Another prominent example of the practice of laundering in agriculture can be observed in the cattle sector. In this context, the laundering practice involves, for example, farmers who own multiple properties, some of which have been deforested illegally while others remain intact (see scheme in Figure 6 below).





Figure 6 illustrates how farmers may bypass supply chain monitoring to "clean" cattle origin before selling them to slaughterhouses that monitor their supply chains (in blue on the right). Producers transfer animals to a compliant property, making it appear they were raised on deforestation-free land. This tactic conceals their true origin and masks links to deforestation.

Source: Aidenvironment, adapted from Imazon.

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### 2. Common challenges

#### Supply chain's complex structures

The complexity and dynamics of different commodity supply chains are one of the major challenges to product traceability. This complexity is linked to the different production and trade dynamics of each product and how these are organized in different geographies across producing countries.

Soy's supply chain is relatively simple compared to other EUDR commodities like cattle, cocoa, or palm oil. Most soy is purchased directly from producers, with a smaller share coming from cooperatives or intermediaries (see Figure 7).

According to the <u>2024 Soft Commodity Forum</u> report, Brazil's six largest soy traders (1) sourced about 82% of soy directly and 18% indirectly in one Cerrado region (2). They monitor 96% of direct and 31% of indirect suppliers. Notably, Bunge reports tracing 90% of its indirect suppliers and is working to extend this approach to cooperatives and intermediaries at no cost.

Figure 8. Scheme of the cocoa supply chain in Cameroon

Figure 7. Scheme of direct and indirect sourcing of soy

Image: Single Single

396 Coop registered at the CICC 45k T 300 000 producers 292k T Plots 375 000 Ha Source: 2022. Fabre, T. et 34 units of grin (but 4 major ones) al. Traceability, 62k T /- 40% transparency and sustainability in the cocoa LBA sector in Cameroon. Available at: 208 I BA https://www.nitidae.org/file 270k T Communities s/3d0e775c/traceability\_tr (land allocation, Coxina labour, etc) ansparency\_and\_sustainab Thousands of coxeurs (+ some LBA / Coop...) ility\_in\_the\_cocoa\_sector\_i 292k T 152k T exported incl. 33 Exporters ce: ONCC, campaign report, 2020-2021 s estimates and simplifications (but 4 major ones) 65% to the EU size proportional to the flow .pdf 210k T

**Source:** AidEnvironment based on data from <u>SIGEF</u> and <u>Conab</u> (Brazil).

There are significantly more complex supply chains where tracing products from the exporting port back to the aggregation point is particularly challenging. Figure 8 illustrates the cocoa supply chain in Cameroon, showing that the mixing of cocoa beans begins at the producer level, where beans from different plots or production units are combined before being sold.

In this example, it is evident that 40% of cocoa beans are sold through cooperatives, and 20% are sold directly to large buyers. However, the remaining 40% passes through thousands of small intermediaries, which makes traceability extremely difficult. It is important to note that this scheme represents the context in Cameroon, and the cocoa supply chain can vary significantly in other regions and producing countries, such as Ghana or Côte d'Ivoire.

(1) ADM, Bunge, Cargill, LDC. Cofco and Viterra

<sup>(2)</sup> The current expansion of soy production areas is concentrated in the Cerrado biome in Brazil. Although Cerrado is known as one of the most biodiverse Savannahs in the world, a significant part of its native vegetation is classified as "forest" under the FAO forest definition adopted by the EUDR.



### **3. Traceability initiatives**

#### Cattle (beef and leather) - Brazil

In Brazil's cattle sector, significant traceability initiatives were introduced in 2009 when meatpackers operating in the Amazon region entered into legally binding agreements with public prosecutors. These agreements, <u>known as TACs</u> (Terms for Adjustment of Conduct or Operations), compel companies to address issues such as illegal deforestation, forced labour, and other illicit activities within their supply chains. However, an ongoing challenge within the TAC framework is the insufficient enforcement against non-compliant slaughterhouses.

That same year, following the release of Greenpeace's report "<u>Slaughtering the Amazon</u>," civil society organizations formed the Public Livestock Commitment. This voluntary agreement, which included meatpackers and retailers, broadened the scope of the TAC from solely addressing "illegal deforestation" to adopting a more comprehensive zero-deforestation goal. In 2019, the <u>Beef on Track</u> initiative was launched to integrate these two frameworks, providing shared audit guidelines and strategies to block or reintegrate non-compliant suppliers.

While these agreements technically apply to both direct and indirect suppliers, in practice, the majority of meatpackers monitor only their direct suppliers. A study by <u>Visipec</u> highlighted the consequences of this oversight: by focusing exclusively on direct suppliers, only 41% of deforestation risks within the supply chain can be monitored. However, including tier 1 and tier 2 indirect suppliers in the monitoring process would cover 100% of deforestation risk within the supply chain. To address these gaps, especially regarding indirect suppliers, new traceability initiatives have been developed. These initiatives often depend on the Animal Transportation Guide (GTA), a mandatory sanitary document required for the movement of livestock between properties and to slaughterhouses, as well as animal ear-tagging systems to track livestock throughout their life cycle.

One notable initiative utilizing GTA data is the <u>Working Group of Indirect</u> <u>Suppliers (GTFI)</u>. They developed the Visipec tool in collaboration with the University of Wisconsin. Although it is not publicly available, it is already being used by major meatpackers, such as Marfrig and Minerva.





Another initiative based on GTA is the <u>Selo Verde</u> platform, a governmental tool that overlays official data to allow real-time verification of environmental and social compliance along the supply chain. In the state of Pará, this platform monitors cattle, and in Minas Gerais, it extends to both cattle and coffee supply chains.

In parallel, a separate group of initiatives uses animal ear-tagging to track cattle movements throughout their life cycle. One such example is the <u>Coti–Primi</u> initiative, which is driven by the private sector and includes downstream actors from the beef and leather sectors. As of 2024, this system had tagged approximately 125,000 animals, while Brazil's total cattle herd was estimated at 238 million animals in 2023. A public platform is expected to be launched soon.

Coti Initiative

Governmental initiatives have recently gained force at the state and federal levels. In 2023, the government of Pará launched the Sustainable Livestock Program, aiming to tag all cattle in the state by 2026, though no updates on implementation have been shared yet.

Finally, at the end of 2024, Brazil's federal government introduced the National Plan for Individual Identification of Cattle, intending to tag the entire national herd by 2032 for both sanitary and traceability purposes.



### **3. Traceability initiatives**

#### Cocoa & Coffee - Ivory Coast, Ghana, Uganda

Full traceability from farm level to first purchase point is challenging, both in cocoa and coffee supply chains, especially when small farmers are involved. This section therefore discusses traceability challenges and initiatives specific to cocoa in Ivory Coast and Ghana, and coffee in Uganda. Challenges at cocoa traceability at farmer level, local traders' level, and cooperative level are well summarised by <u>Nitidae and EFI</u> in 2021. Many of these also apply to small coffee farmers.

Cocoa and, at times, coffee are often grown in separate plots or agroforestry systems alongside other crops, making it difficult to pinpoint which crop directly causes deforestation. Many farmers operate as sharecroppers without formal agreements or lease plots from various landowners, making it challenging to identify and involve producers in a traceability strategy. Additionally, production is highly fragmented. Cooperatives typically only maintain a list of producers, with beans being mixed at various stages: on the farm, at the cooperative, and again before export, either to meet volume or quality requirements. Moreover, trade relationships are also unstable, with continuous changes in buyers due to price fluctuations and varying trading seasons. These factors make traceability challenging. However, a proposed approach to address this challenge involves linking deforestation risks to a cocoa cooperative by examining its sourcing area, which typically consists of producers located within a 25 to 50-kilometre radius. This method can help monitor deforestation risks in areas where defining individual production plots is difficult.

#### Examples of cocoa and coffee traceability initiatives

One of the most significant traceability efforts in the cocoa sector is the <u>Cocoa & Forest Initiative</u> (CFI), which was launched in 2017. This initiative is a partnership between three governments (Côte d'Ivoire, Ghana, Colombia) and 35 leading chocolate and cocoa companies, coordinated by IDH along with other civil society organizations. The initiative developed a common framework of action to improve the cocoa supply chain, addressing traceability issues, which resulted in National Implementation Plans in each participating country. As of 2023, the initiative reports that 83% of direct suppliers to the participating companies were traceable in Ghana, and 82% of cocoa production in the Ivory Coast was traceable to the plot level. Trase <u>results</u> on the other hand, conclude that only around 35% of the Ivory Coast country's cocoa exports was directly sourced from farmer cooperatives, a decrease from 39% in 2021, while the remainder is indirectly sourced via additional intermediary suppliers, making traceability much more challenging.







In Uganda, the Uganda Coffee Development Authority is leading the EUDR National Task Force, which aims to register and map the estimated 2 million smallholder coffee producers. The primary challenges faced are the cost of this effort and resistance from producers, as many fear that the mapping could lead to increased government control over production and pricing. Additionally, unlike other countries, Ugandan coffee and cocoa producers are less frequently organized in cooperatives, which complicates monitoring trading flows.



In Brazil, other than cattle supply chains, the <u>Selo Verde</u> platform also extents to coffee supply chains (mainly in coffee producing state Minas Gerais).



In parallel with these public efforts, many of the largest cocoa and coffee exporters are developing their own traceability systems to comply with the EUDR. Some are building on existing certification schemes, while others are starting from scratch. The Fine Cocoa and Chocolate Initiative (FCCI) recently benchmarked 21 traceability tools developed by specialized companies to meet the growing demand for traceability tools in these private sector initiatives.



However, a key challenge is that these efforts often do not align with each other. This creates the risk of duplicating efforts and eventually building parallel systems that fail to communicate with one another. Also, only an <u>estimated 26%</u> of global cocoa production is traded under some form of sustainability commitment, often with traceability requirements, including major certification schemes (Rainforest Alliance, Fairtrade, and Organic). The same applies for coffee, although between 2020 and 2022, about 55% of global coffee production was certified, but less than half of that was purchased as certified coffee by the industry.

### **3. Traceability initiatives**

#### Palm oil - Indonesia

The palm oil sector is one of the most advanced in terms of traceability. In Indonesia, for example, many key palm oil traders, especially those exporting to the EU, already have traceability systems that cover concession-to-mill level, often as part of No Deforestation, No Peat, No Exploitation (NDPE) commitments or certification requirements. The RSPO Geo System (Figure 9), for instance, allows public access to concession polygons submitted by certified companies, and most NDPE compliant oil palm growers publish or disclose their global mill lists annually (example <u>Unilever</u>). Nevertheless, RSPO certification alone is no sufficient evidence of full supply chain traceability or compliance with EUDR requirements.

In Indonesia, both government and private sector initiatives are actively mapping smallholders. For instance, as of end 2023, Golden Agri-Resources <u>claims</u> to have achieved 99% full traceability to the plantation level, including independent smallholders. Also, Unilever started <u>piloting</u> blockchain technology (<u>GreenToken</u> by SAP) to strengthen traceability of 'first mile' in the palm oil

supply chain. There are also private service providers mapping palm oil smallholders' land, for instance <u>Transform</u>, led by Earthqualizer. The platform supports companies with NDPE commitments and claims that smallholders operate 62% of their mapped area.







However, challenges to traceability remain. One of the biggest issues is mapping of independent smallholders - those outside concession areas. There are three types of palm oil suppliers, *Inti* (company's own plantations), *Plasma* (contracted smallholders), and *third-party* suppliers, of which traceability to the last category is most complex (Figure 10). In specific contexts, due to land tenure complexities, traceability may only be possible at the community level, and it may not be possible to point to a specific 'plot of land'. Nevertheless, smallholders or independent producers are increasingly becoming part of the palm oil supply chain in Indonesia. To address the challenge of traceability for smallholder producers, governmental strategies began with the implementation of <u>Regulation 98</u> in 2013, which introduced the cultivation registration permit (STD-B). STD-B is already an <u>ISPO requirement</u> and is intended for smallholders with less than 25 ha of land. The processing is free of charge for smallholders. This system records key information, such as producer identity and plantation location. However, the <u>lack of standardized data</u> collection and the unclear division of responsibilities between national and subnational authorities in implementing this regulation have hindered the effective mapping of smallholder plantations.

RSPO <u>states</u> that 'the <u>Malaysian</u> and <u>Indonesian</u> governments have confirmed that there are no legal constraints preventing RSPO from publishing its members' concession maps". RSPO said that "the Indonesian Government is not authorised to share such information, however, companies who provide consent, are free to share concession maps with other parties, for their own benefit". This latter <u>statement</u> is an important counterargument to the palm oil industry that initially claimed that under the EUDR it is expressly forbidden for all parties in Indonesia and Malaysia to publish and share concession maps.

Figure 10. Complexity of third-party suppliers. Source: WRI, 2018. Note: To supply palm oil to a mill, third party suppliers are obliged to sell under a delivery order (DO) contract. The mill in this case, Sei Tapung Mill. receives approximately 67 percent of its palm oil supply from its Inti and Plasma plantations, and 33 percent from third-party suppliers through DO holders.





#### Soy – Brazil

In the Brazilian soy sector (#1 supplier to Europe), traceability is already integrated into various agreements and voluntary actions. Two major traceability initiatives are the <u>Amazon Soy Moratorium</u> (ASM) and the <u>Soft Commodity Forum</u> (SCF). Since 2006, the ASM is a voluntary agreement to stop soy-driven deforestation in the Brazilian Amazon, banning the trade and financing of soy from deforested areas post-July 2008. It involves the private sector, civil society, and is endorsed by the

Brazilian government. While the ASM significantly contributed to decreasing deforestation linked to soy expansion in the Amazon biome, at the same time, soy production and deforestation risks in the Cerrado biome saw a significant increase (so called "leakage effect"), especially in the Matopiba region, comprised of municipalities in the states of Maranhão, Tocantins, Piauí, and Bahia. In 2019, 88,000 hectares of soy came from non-compliant farms, particularly in Mato Grosso state.



In response to the increased native vegetation conversion in the Cerrado, the SCF started in 2019 by six leading grain traders (Cargill, Bunge, ADM, Cofco, LDC, Viterra). It addresses deforestation in the Brazilian Cerrado biome, focusing on 61 priority municipalities where most soy-driven deforestation occurs. Led by the World Business Council for Sustainable Development (WBCSD), SCF monitors areas based on soy planting and deforestation rates.



Figure 11. Zero-deforestation targets by leading soy traders

Trader	Eliminate deforestation by (*)
Cargill	2030
Bunge	2025
ADM	2030 (full traceability by the end of 2022)
Louis Dreyfus	2025
Cofco	2025
Viterra	2025

**Sources**: companies' no-deforestation policies and progress reports – <u>Cargill, Bunge, ADM, Louis Dreyfus, Cofco, Viterra</u>. (\*) Unless specified, also interpreted as being the date for achieving full traceability, including direct and indirect suppliers.

The six leading agribusinesses each have their own traceability targets (Figure 11). Five out of six traders in the SCF now trace 100% of soy to the first point of collection in 61 key municipalities in Brazil's Cerrado biome. They are also supporting indirect suppliers, such as cooperatives, in implementing similar traceability measures. For instance, Bunge offers free access to deforestation mapping tools to its indirect suppliers.



In addition to companies' commitments, data availability and accuracy are not a challenge in Brazil. The Spatial Research Agency (<u>INPE</u>) provides official yearly deforestation maps (Prodes, Deter) based on satellite analysis, and other systems like <u>MapBiomas</u>, <u>Imazon</u>, <u>Global Forest Watch</u>, and <u>GLAD Lab</u> offer supplementary tools. Platforms like <u>Agroideal</u> help the private sector assess areas where soy expansion could present risks.

The primary remaining challenge in Brazilian soy is related to traceability for soy supplied by indirect sources, in practice, soy supplied by cooperatives (aggregators). Within the Cerrado, the SCF members still source an important share of their soy volumes from indirect suppliers, <u>reportedly</u> 20% (ADM), 32% (Bunge), 21% (Cargill), 41% (Cofco), 33% (LDC), and 40% (Viterra) in 2023.

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