

June 2025



Compliance Checker Brazilian timber to Europe

Six potential noncompliance timber case studies linked to Brazilian wood companies exporting to European operators



Executive summary

*This is part I of two theme reports on wood operations covered under the EU regulation on deforestation-free products (EUDR). It is part of a series of reports on key commodities’ producing, trading, and buyer companies that will serve as input for AidEnvironment’s **Compliance Checker**, an interactive case studies’ Dashboard. This report covers “non-EU companies exporting wood to the EU (with a focus on Brazil)”, while the second report centers around “domestic companies placing wood on or exports from the Union market”. Key element of this report is the demonstration of six potentially noncompliant **case studies on wood operations of various Brazilian companies**, that might be noncompliant with the EUDR if the wood from these companies would enter the EU market from January 2026. The report’s case studies #1-5 have been shared on 19 May and 2 June 2025 for further engagement with several EU wood operators (**Van den Berg Hardhout, GWW Houtimport, Vandecasteele Houtimport, Precious Woods, Peltier Bois, F. Jammes, and Maicarú Hardwoods**) buying Brazilian wood, while wood case study #6 has been shared with **JBS and Marfrig** on 12 June 2025. The meatpackers use wood biomass as fuel, for instance for their industrial boilers. The companies’ responses (if provided) have been integrated into the report.*

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Main Brazilian wood exporters to Europe



Top-5 importers of Brazilian wood: Germany, Portugal, Spain, Belgium, and the Netherlands

Brazil exported 81% of its wood to Europe to only five European countries: Germany, Portugal, Spain, Belgium and The Netherlands (Figure 1 below). This is based on a sample of Brazilian shipment data of combined exports of plywood (harmonized system code 4412), roundwood (harmonized code 4403) and sawn wood (harmonized code 4407) between 1 January 2021 and 30 November 2023. The largest Brazilian wood exporters include two key logistical companies (DB Schenker and Kuehne & Nagel), that mainly export plywood to Europe. It is unclear on behalf of which EU operators these logistical companies ship their wood. On the other hand, many Brazilian wood producers in the top exporting list (Figure 1), such as Madeireira Timber Prime, Pallets Castillo, Cras Agroindustria, Tanac, and Mil Madeiras Preciosas, mainly export sawn wood to Europe.

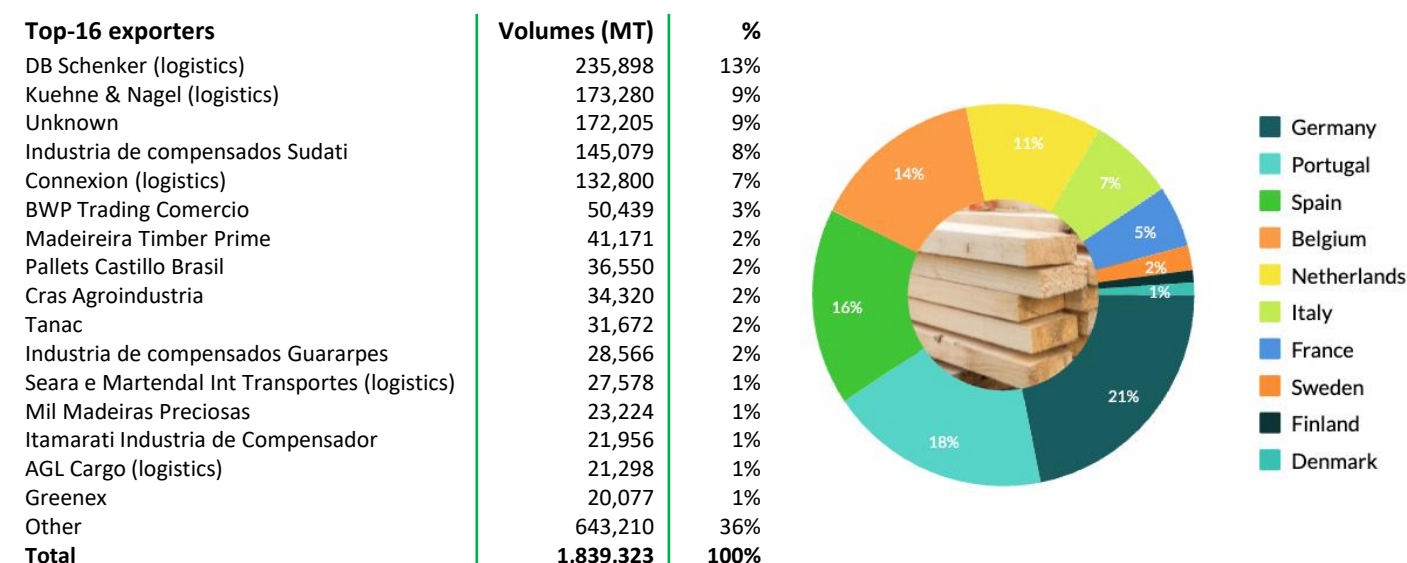


Figure 1. Brazil wood exports (plywood, sawn wood and roundwood) to Europe. Table on the left shows the top-16 Brazilian wood exporters, while the pie chart on the right displays the top-10 importing EU countries of Brazilian wood. Source: AidEnvironment, based on Brazilian shipment data for HS codes 4403, 4407, and 4412 between 1 January 2021 and 30 November 2023.

Most Brazilian wood exports to Europe between 2021-2023 contain plywood (57%), followed by sawn wood (32%) and roundwood (11%). The shipment data analysis also reveals that EU countries have different wood type import profiles. For instance, Germany and Belgium mainly import Brazilian plywood (HS 4412), Portugal mainly imports roundwood (HS 4403), while The Netherlands and Spain mainly import sawn wood (HS 4407) (Figure 2).

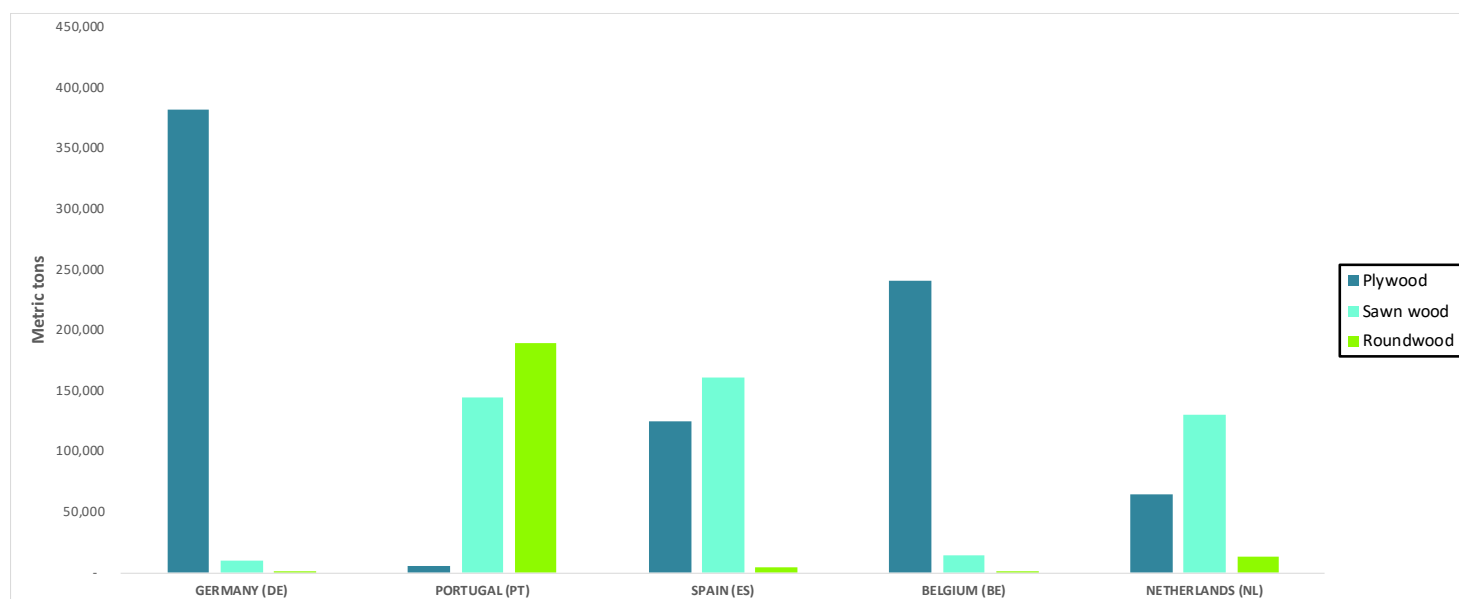


Figure 2. Wood type import profiles of the top-5 largest EU Brazilian wood importing countries. Source: AidEnvironment, based on Brazilian shipment data for HS codes 4403, 4407, and 4412 between 1 January 2021 and 30 November 2023.



Environmental fines linked to the largest Brazilian wood exporters to the EU

AidEnvironment has analysed Brazilian [environmental fines](#) between 2021-2025 linked to the largest Brazilian wood producing and exporting companies to Europe, filed by the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA). IBAMA, a federal agency under the Ministry of Environment is mandated to enforce Brazilian anti-deforestation laws and monitor illegal logging, wildlife trafficking, pollution, oil spills, and other environmental crimes.

Environmental fines and illegalities can pose significant risks under the legality requirement of the EUDR. Analysing the first 21 largest Brazilian wood producing companies exporting to Europe, eight of them were found to have received environmental fines. Large logistical companies exporting wood to Europe such as DB Schenker and Kuehne & Nagel are excluded from the analysis since they do not produce wood themselves. IBAMA imposed a total of 154 fines on those eight companies between January 2021 and May 2025, totalling BRL 7.83 million (about EUR 1.23 million) (Figure 3 below).

The Brazilian wood exporters with the largest number and total costs of environmental fines are targeted as case studies in this report, including MIL Madeiras Preciosas (page 7), Cras Agroindustria (page 9), Greenex (page 11), Brasil Exportadora de Madeiras (page 13), and Brasil Norte Ind Com and Exp de Madeiras (page 15). Details about the imposed fines can be found in each case study report.

Brazilian wood producers that export to the EU	Top 21	Number of fines 2021-2025 and the total costs in BRL and EUR		
		#	BRL	EUR
Industria de compensados Sudati Ltda	1	0		
BWP Trading Comercio	2	0		
Madeireira Timber Prime	3	2	19,736	3,110
Pallets Castillo Brasil	4	0		
Cras Agroindustria Ltda	5	61	4,531,614	717,800
Tanac	6	0		
Industria de compensados Guararpes Ltda	7	0		
MIL Madeiras Preciosas Ltda	8	5	145,726	22,675
Itamarati Industria de Compensador Ltda	9	1	370,000	58,312
Greenex Industria Comercio e Exportao de Madeiras Ltda	10	65	1,910,968	297,155
Conply	11	0		
Compensados Laselva Ltda	12	0		
Repinho Reflorestadora Madeiras e Compensados Ltda	13	1	19,300	3,041
Berneck SA Paineis e Serrados	14	0		
Nereu Rodrigues and CIA Ltda	15	0		
Brasilmad Exportadora SA	16	0		
Madeireira Belo Horizonte	17	0		
Palmasola SA Madeiras e Agricultura	18	0		
Rionile Madeiras Ltda	19	0		
Brasil Exportadora de Madeiras Ltda	20	17	756,087	117,345
Brasil Norte Ind Com and Exp de Madeiras Eireli	21	2	77,651	11,974
Total		154	7,831,082	1,231,412

Figure 3. IBAMA imposed environmental fines on the main Brazilian producers and exporters of plywood, sawn wood and roundwood to Europe. Highlighted in orange the Brazilian timber exporters with the largest number and total costs of environmental fines. Source: AidEnvironment, based on Brazilian shipment data for HS codes 4403, 4407, and 4412 between 1 January 2021 and 30 November 2023 and Brazil's IBAMA [website](#), 2021-2025 (only till May 2025). Note: For many of the indicated fines, the accused company still has the possibility to contest the outcomes, and therefore the status is not yet definitive. Not having imposed fines does not mean that no violations exist.

EU operators linked to fined Brazilian wood exporters



European importing operators linked to fined Brazilian wood exporters

Excluding the largest importing logistical operators (e.g. DB Schenker and Kuehne & Nagel are, apart from being the largest Brazilian wood exporters also the largest EU importing operators), this page lists some of the largest European recipient companies of tropical hardwoods from Brazil that are linked to Brazilian exporters with imposed IBAMA fines (Figure 4).

It is important to highlight that Brazilian wood exporters with the highest number of environmental fines and imposed costs, mainly link to European operators from the Netherlands, followed by France, Belgium, and Germany.



Figure 4. Main European recipients of tropical hardwoods from Brazil that are linked to Brazilian wood exporters with imposed IBAMA fines. The larger the logo, the more frequent represented in case studies collected in this report. Source: AidEnvironment, based on Brazilian shipment data for HS codes 4403, 4407, and 4412 between 1 January 2021 and 30 November 2023 and Brazil's IBAMA [website](#), 2021-2025 (only till May 2025).

Brazilian wood case studies



Six potentially noncompliant wood case studies

This section covers six wood case studies with likely legality issues since the EUDR cut-off date (30 December 2020), that might be noncompliant with the EUDR if any wood derived from these Brazilian wood companies would enter the EU market from January 2026 (Figure 5).

The report's case studies have been shared with various European wood importing operators for further engagement in June 2025, and the companies' responses (if provided) have been integrated into the report.

Case	Brazilian wood exporter	Main EU27 wood importers	Location (all in Brazil)	Page
1	MIL Madeiras Preciosas	ZXKTrading, Regge Hout, Van den Berg Hardhout, F. Jammes, Precious Woods Europe, Vandecasteele houtimport, Keflico	Itacoatiara, Amazon	7
2	Cras Agroindustria	Van den Berg Hardhout, Nailtra, GWW Houtimport	Belém, Pará	9
3	Greenex	GWW Houtimport, Van den Berg Hardhout, Hoogendoorn Hout, Tradelink Madeiras, Peltier, Maicarú Hardwoods	Santa Bárbara, Pará	11
4	Brasil Exportadora de Madeiras	GWW Houtimport, Van den Berg Hardhout, Houtvisie, F. Jammes, Peltier, Compagnie des Bois Caraïbes, Maicarú Hardwoods	Ananindeua, Pará	13
5	Brasil Norte Ind Com and Exp de Madeiras	Novum Timber, Van den Berg Hardhout, GWW Houtimport Vogel, Vandecasteele Houtimport, Maicarú Hardwoods; Peltier, Tradelink Madeiras	Belém, Pará	15
6	Santa Rita de Cássia farm (a.k.a. Lote 14 - Gleba 05 - Corumbiara)	Direct buyers in Brazil: JBS, Marfrig, Amaggi, Indusparquet. Indirect buyers: CPF Parquet, United Construction Products, BRW Floors, Planchers De Bois Exotique	Pimenta Bueno, Rondônia	17

Figure 5: Selected Brazilian wood case studies.

MIL Madeiras Preciosas



Location: Itacoatiara, Amazon

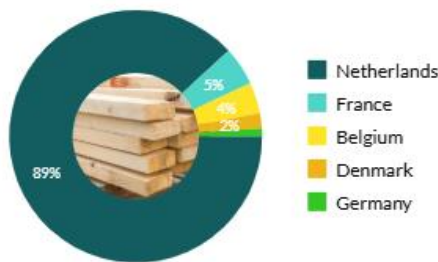
Biome: Amazon (Brazil)

Forest managed: 572,892 hectares

Ultimate owner: Precious Woods Holding AG (Switzerland)

Link to European buyers

Mil Madeiras Preciosas wood (4407) exports to EU



Top-5 EU importing country

	Netherlands (89%)
	France (5%)
	Belgium (4%)
	Denmark (2%)
	Germany (<1%)

Top-3 EU importing operators

ZXK Trading (53%), Regge Hout (20%), Van den Berg Hardhout (11%)
F. Jammes (76%), Precious Woods Europe (17%), Timber Rex (4%)
Regge Hout (65%), Vandecasteele Houtimport (24%), Desindo (9%)
Keflico (100%)
WOB Timber (87%), Binder Spedition and Logistik (13%)

Figure: EU recipient countries and importers of Brazilian sawn wood (HS 4407) from Mil Madeiras Preciosas 2021-2023. Source: AidEnvironment, based on Brazilian shipment data January 2021– November 2023.

Sanctions

Year	Sanctions	Amount (BRL)	Details of fines (locations)
2022	4	125,983	Transporting /having in storage various species of wood (e.g. Martiodendron elatum - Tamarind) without a valid license (DOF with species discrepancy) or without legal origin (Manaus and Itacoatiara, both in Amazon state). Infraction numbers BUI547XX; EOKOY1CP; EUKC3QTR; WO6QUB6D. In response to this case study, Precious Woods stated (30 May 2025) that “ <i>incorrect identification of this species was the result of a mistake made in the past by the agency [IBAMA, ed.] itself, which is why an administrative defense was filed, requesting that the fine be invalidated</i> ” (see full response of Precious Woods here).
2025	1	19,743	Transporting 65.811336 m³ of sawn timber (processed) in disagreement with the license obtained from the competent authority (Manaus, Amazon). In response to this allegation, Precious Woods states that “ <i>In this case, the company presented a shipment of sawn timber of the CUMARU species for export. The cargo was inspected and IBAMA did not identify any problems with it. However, the agency found that the volume of the spacers placed between the pieces of wood (packaging made from residues of the forest product shipped) was not informed in the DOF system, which is why it understood that the export of the entire cargo would be irregular. As we believe that this assessment was irregular - the DOF system regulations do not require the insertion of information about the package of wood exported and the volume of the spacers was within the margin of tolerance established in the legislation - a writ of mandamus was filed to release the cargo, which is still awaiting a decision from the Federal Court of Amazonas</i> ”.
Total	5	145,726	

Overview IBAMA imposed environmental fines on Mil Madeiras Preciosas since 2021. Source: Brazil's IBAMA [website](#), 2021-2025 (till May 2025). Note: For many of the indicated fines, the accused company still has the possibility to contest the outcomes, and therefore the status is not yet definitive.

IBAMA sactions imposed on MIL Madeiras Preciosas total BRL 145,726 between 2021-2025



MIL Madeiras Preciosas

Business relationships

European buyers of MIL:
Z XK Trading
Regge Hout
Van den Berg Hardhout
Vandecasteele Houtimport
F. Jammes
Keflico
Precious Woods EU (parent)

Company response: In response to a draft version of this case study shared with Precious Woods Europe on 19 May 2025, the company states (30 May 2025) that “all products marketed by Precious Woods MIL in Europe comply with the environmental licensing processes provided for in Brazilian law.” Based on the response of Precious Woods, AidEnvironment removed or adjusted several IBAMA environmental infraction reports on the previous page and this page. In most cases, Precious Woods asserts that “IBAMA identified that the scientific name of a forest species managed by the company was incorrect” but PW states that “it turns out that this discrepancy was the result of a mistake by IBAMA itself”. The full response of Precious Woods can be found [here](#).

Case description

Brazilian timber mill “MIL Madeiras Preciosas (MIL)”, founded in 1994, is a subsidiary of former publicly listed Swiss company Precious Woods Holding, that presents itself as a “global leader in the certified and sustainable management of tropical forests”, managing over “1.1 million hectares of forest” (1). MIL reportedly owns 572,892 hectares of forest in Itacoatiara, 250 kilometres to the east of Manaus municipality in the Amazon state (2). Precious Woods’ main clients are the marine and hydraulic engineering sector, garden, building and road construction, as well as outdoor furniture manufacturers in markets across Europe, Brazil, Asia, and the U.S. (3).

Disregarding the largest logistical companies exporting Brazilian timber to Europe, MIL ranks as the eight supplier of Brazilian sawn wood (HS 4407) to the European Union, notably to the Netherlands, France, and Belgium (4). Its main European importers include Z XK Trading (Netherlands), Regge Hout (imports in Belgium and the Netherlands), F. Jammes (France), Keflico (Denmark), and its parent company Precious Woods Europe (imported in France) (see also previous page). Little information is available on Z XK Trading, ranked the 10th place of largest importers of sawn wood from Brazil in The Netherlands, with 11,276 metric tons (MT) imported between 2021-2023, of which nearly all (10,987 MT) is directly sourced from MIL. There are documents indicating that Z XK Trading is FSC certified (5).

Mil Madeiras Preciosas Ltda has been fined for numerous (environmental) violations linked to its timber operations. IBAMA imposed 36 environmental fines linked to Mil Madeiras Preciosas Ltda operations in Brazil between 1998 till 2020, with a total fine worth EUR 1,382,961 (6). From 2018 onwards, most of the fines relate to environmental management violations, including the trading, transport, and export of timber without a valid permit. In the past, the company is also fined for clearing native Amazon vegetation without a valid permit. IBAMA imposed 5 fines on MIL for alleged illegal timber operations (see also previous page for more details), totalling BRL 145,726 (about 22,675 Euros) between January 2021 and May 2025 (7). Since these are all after the EUDR cut-off date (30 December 2020), the company and its buyers run the risk of being noncompliant under the legality requirements of the EUDR.

- (1) Precious Woods website, online: <https://www.preciouswoods.com/en/home>, viewed May 2025.
- (2) Precious Woods website, online: <https://www.preciouswoods.com/en/about-us/locations>, viewed May 2025.
- (3) Precious Woods Annual Report 2024. Online: <http://reports.preciouswoods.com/en/2024/report/operational-review/strategy-and-business-model/strategy-business-model-and-added-value>
- (4) Brazilian shipment data 1 January 2021 – 30 November 2023, for HS codes 4403 (roundwood), 4407 (sawn wood), 4412 (plywood).
- (5) FSC certification record 2024. Online: <https://alldeco.nl/Alldeco/PDF%20Bestanden/FSC2024.pdf>, viewed May 2025.
- (6) Brazilian IBAMA website, https://dadosabertos.ibama.gov.br/dados/SIFISC/auto_infracao/auto_infracao/auto_infracao.csv.
- (7) Brazilian IBAMA website, environmental fines were analysed between 1 January 2021 and 15 May 2025. online: <https://servicos.ibama.gov.br/ctf/publico/areasembargadas/>, viewed in May 2025



Location: Belém, Pará, Brazil

Biome: Amazon (Brazil)

Forest managed: Unknown

Ultimate owner: KRC Investments

[Link to European buyers](#)

CRAS Agroindustria wood (4407) exports to EU



Top-5 EU importing country



Netherlands
(99%)

France
(**<1%**)

Top-3 EU importing operators

Van den Berg Hardhout (92%), Nailtra (5%), GWW Houtimport (1%)

Peltier (45%), Guillemette et Cie (41%), Pierre Robert (14%)

Figure: EU recipient countries and importers of Brazilian sawn wood (HS 4407) from CRAS Agroindustrial 2021-2023. Source: AidEnvironment, based on Brazilian shipment data January 2021– November 2023.

Sanctions

Year	Sanctions	Amount (BRL)	Details of fines (locations)
2021	1	6,549	Exporting 21.8295 m ³ of garapa and yellow ipê decking, without the export authorization provided for Ibama Normative Instruction No. 15/2011 (Belém, Pará).
2022	3	41,559	Selling and exporting respectively 19.9275 m ³ , 41,236 m ³ , and 77,367 m ³ of various sawn wood products and species (e.g. Cumaru Sawn Wood, Hymenolobium Ducke - Angelim-Pedra, and Angelim Vermelho) without valid licenses granted by the competent authority (Belém and Barcarena, Pará).
2023	51	1,164,518	Too many fines to summarise here. All fines are linked to locations Belém and Barcarena in Pará, and in particular to exporting wood without valid environmental licenses. For instance, for “selling 19.6063 m ³ of sawn wood of Angelim-vermelho (Dinizia excelsa Ducke), being 7.295 m ³ of beams and 12.3113 m ³ of planks, through GF3/DOF: 380268, Invoice: 621, DU-E 19BR000366114-7, country of destination Netherlands (Holland), without Export Authorization issued by Ibama, failing to comply with IBAMA Normative Instruction No. 15/2011”. AidEnvironment can share all fine descriptions upon request.
2024	6	3,318,988	Five fines relate to exporting various timber sawn wood species without the proper environmental licenses and authorization, and one on transporting processed wood in disagreement with the SEMAS/PA forestry transport guide number 1174263 (Belém and Barcarena, Pará).
2025 (May)	0	0	
Total	61	4,531,614	

Overview IBAMA imposed environmental fines on CRAS Agroindustria since 2021. Source: Brazil's IBAMA [website](#), 2021-2025 (only till May 2025). Note: For many of the indicated fines, the accused company still has the possibility to contest the outcomes, and therefore the status is not yet definitive.

IBAMA sactions imposed on CRAS Agroindustria total **BRL 4,531,614** between 2021-2025



CRAS Agroindustria

Business relationships

European wood buyers of CRAS Agroindustria:

Van den Berg Hardhout
Nailtra
GWW Houtimport, Peltier,
Guillemette et Cie

Company response: In response to a draft version of this case study shared with a selection of key EU wood buyers in May and June 2025, Van den Berg Hardhout, GWW Houtimport, and Peltier Bois did not reply.

Case description

Established in 2011, CRAS Agroindustria Ltda operates under the umbrella of CRAS Brasil, a Brazilian company engaged in agribusiness, trading, energy, and processed wood products (1). Apart from a wood processing site in Belém municipality in Pará state, CRAS Agroindustria operates a production facility in Itaju, São Paulo, specializing in peanut oil processing, making the company one of the leading Brazilian peanut oil exporters. CRAS Brasil is majority owned by KRC Investments (51%), while CEO Rodrigo Chitarelli reportedly owns 29% of the company and Treasury Stock 20% (2).

Even though IBAMA since 2019 significantly decreased the number of fines due to the new federal government environmental governance strategy, the Brazilian organisation still imposed 61 fines on CRAS Agroindustrial for allegedly illegal timber operations (see also previous page for more details), totalling BRL 4.5 million (about 717,800 Euros) between January 2021 and May 2025 (3). Since these are all after the EUDR cut-off date (30 December 2020), the company and its buyers run the risk of being noncompliant under the legality requirements of the EUDR.

One of these buyers with high risk is Van den Berg Hardhout in the Netherlands. The company is a leading importer and distributor of FSC-certified tropical hardwoods. The IBAMA imposed fines clearly indicate the Netherlands as a destination country of some of the illegal hardwood exported. With CRAS Agroindustria exporting 99% of its Brazilian sawn woods (HS 4407) to the Netherlands in the shipment data sample, of which Van den Berg Hardhout receives 92% (4), chances are significant that this Dutch operator will receive tropical hardwoods such as Ipê, Cumuru, and Jatobá from CRAS Agroindustrial that may be noncompliant with the EUDR's legality requirements.

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- (1) CRAS Brasil website, online: <https://www.crasbrasil.com.br/>, viewed in May 2025.
 (2) Datamar News (2022). Peanut Oil drives CRAS Brasil growth, online: <https://www.datamarnews.com/noticias/peanut-oil-drives-cras-brasil-growth>, viewed in May 2025.
 (3) Brazilian IBAMA website, environmental fines were analysed between 1 January 2021 and 15 May 2025. online: <https://servicos.ibama.gov.br/ctf/publico/areasembargadas/>, viewed in May 2025.
 (4) Brazilian shipment data 1 January 2021 – 30 November 2023, for HS codes 4403 (roundwood), 4407 (sawn wood), 4412 (plywood).



Location: Santa Bárbara, Pará

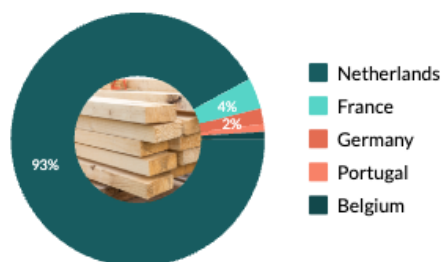
Biome: Amazon (Brazil)

Forest managed: 278,151 km²

Ultimate owner: Greenex (independent)

Link to European buyers

Greenex wood (4407) exports to EU



Top-5 EU importing country

	Netherlands (93%)
	France (4%)
	Germany (2%)
	Portugal (<1%)
	Belgium (<1%)

Top-3 EU importing operators

GWG Houtimport (39%), Van den Berg Hardhout (27%), Hoogendoorn Hout (10%)
Tradelink Madeiras (68%), Peltier (25%), Abysa (7%)
Maicarú Hardwoods (75%), Trius Tech (25%)
GWP Iberica Wood (100%)
Desindo (51%), Katoen Natie (25%), Robison Lumber Group (24%)

Figure: EU recipient countries and importers of Brazilian sawn wood (HS 4407) from Greenex 2021-2023. Source: AidEnvironment, based on Brazilian shipment data January 2021– November 2023.

Sanctions

Year	Sanctions	Amount (BRL)	Details of fines (locations)
2021	-	-	
2022	5	66,785	Multiple violations related to the alleged illegal export of wood without valid environmental licenses, primarily in Pará, Brazil. Specific infractions include exporting 19.1 m ³ of Ipe Amarelo sawn wood, 44.6 m ³ of beams, and 58.7 m ³ of decking from species like Maçaranduba and Ipê, all without proper permits from IBAMA. Additionally, 19.7 m ³ of Ipê decking and 80.4 m ³ of planed Angelim-Vermelho wood were reportedly exported without complying with IN-15/2011
2023	43	902,427	In sum, Greenex faced multiple fines from IBAMA in 2023 for exporting over 2,000 m ³ of tropical hardwoods—including Ipê, Angelim-Vermelho, Maçaranduba, and Cumarú—without valid environmental licenses, violating Brazil's IN IBAMA No. 15/2011. These shipments, destined for countries like the Netherlands (5 times mentioned), Belgium (3x), France (3x), the U.S. (2x), and Canada (1x), often lacked proper documentation and included species listed under CITES or considered threatened.
2024	17	941,757	In sum, IBAMA imposed 17 fines for exporting more than 3,000 m ³ of tropical timber—including Ipê, Angelim Vermelho, Cumarú, Maçaranduba, Jatobá, Tatajuba, and Pequiá—without valid export licenses. Exports went to among others the USA (4 x mentioned), France (1x), and the Netherlands (2x). Infractions occurred across multiple export declarations (DUEs) involving processed and rough-cut wood. Locations linked to these fines include Pará state municipalities Belém and Santarém, where IBAMA typically monitors such operations.
2025 (May)	-	-	
Total	65	1,910,968	

Overview IBAMA imposed environmental fines on Greenex since 2021. Source: Brazil's IBAMA [website](#), 2021-2025 (only till May 2025). Note: For many of the indicated fines, the accused company still has the possibility to contest the outcomes, and therefore the status is not yet definitive.

IBAMA sactions imposed on Greenex total **BRL 1,910,968** between 2021-2025



Business relationships

European wood buyers of Greenex:

GWW Houtimport, Van den Berg Hardhout, Hoogendoorn Hout, Tradelink Madeiras, Peltier, Maicaru Hardwoods

Company response: In response to a draft version of this case study shared with a selection of key EU wood buyers in May and June 2025, Van den Berg Hardhout, GWW Houtimport, and Peltier Bois did not reply. Maicaru Hardwoods replied (15 June 2025) that “it has not been involved in any of the potentially illegal sales that were flagged”. Moreover, the company states that “the fact that there have been no timber embargoes and no sawmill closures among the reported sawmills would seem to indicate, without having reviewed each and every case in the report, that the fines have all or mostly been levied for administrative faults” which is not considered a “red line” for Maicaru. The full response of Maicaru Hardwoods can be found [here](#).

Case description

Greenex Indústria Comércio e Exportação de Madeiras Ltda (from now on Greenex) is a Brazilian company specializing in the export of tropical hardwoods such as Angelim Vermelho, Ipê, Jatobá, Cumaru, and Maçaranduba. The company reportedly occupies a land area of 278,151 km² and has a team of 171 employees, supplying wood products for among others decking, boards, and wooden sleepers to more than 10 countries including Brazil, Netherlands, United States, Belgium, France, Spain, England, Germany, China, Portugal, Denmark, and Greece (1). According to a shipment data sample, Greenex exported a total of 20,077 metric tons of Brazilian sawn wood (HS 4407) to predominantly the Netherlands (93%), France (4%) and Germany (2%), with key importing operators including GWW Houtimport, Van den Berg Hardhout, Hoogendoorn Hout, Tradelink Madeiras, Peltier, and Maicaru Hardwoods (2), see also previous page.

The company states that traceability control is carried out through FSC membership and its chain of custody procedures, identifications through labels, packing slips, as well as Forest Guides and Invoices required in each link of the system. Moreover, the company reports that “the products are processed from the acquisition of raw material from external suppliers duly qualified and certified by the FSC, accompanied by official documents that prove that the forest products come from sustainable forest management projects approved by the federal government agency SEMAS, IBAMA” (3).

Despite these control systems, IBAMA imposed 65 fines on Greenex between January 2021 and May 2025 for alleged illegal timber operations (see also previous page for more details), totalling BRL 1.9 million (about 297,155 Euros) (4). Since these were all imposed after the EUDR cut-off date (30 December 2020), the company and its buyers run the risk of being noncompliant under the legality requirements of the EUDR. While the fines primarily addressed unauthorized exports, they reflect broader systemic issues in Brazil's timber industry, where illegal logging and deforestation are prevalent, especially in states like Pará. The alleged violations underscore Greenex's potential failure to obtain legal clearance for exporting high-value hardwood species, some of which are endangered or CITES-listed (4).

Buyers with high risk include GWW Houtimport, Van den Berg Hardhout, and Hoogendoorn Hout, all based in the Netherlands. In Europe, the Netherlands have received the majority (93%) of Greenex's tropical hardwood (2). The IBAMA imposed fines clearly indicate particularly the Netherlands as a destination country of some of the illegal hardwood exported (4).

(1) Greenex website, online: https://www.greenex.com.br/home_en-us/#home, viewed in May 2025.

(2) Brazilian shipment data 1 January 2021 – 30 November 2023, for HS codes 4403 (roundwood), 4407 (sawn wood), 4412 (plywood).

(3) Greenex website, online: https://www.greenex.com.br/home_en-us/#home, viewed in May 2025.

(4) Brazilian IBAMA website, environmental fines were analysed between 1 January 2021 and 15 May 2025. online: <https://servicos.ibama.gov.br/ctf/publico/areasembargadas/>, viewed in May 2025.



Brasil Exportadora de Madeiras

Location: Ananindeua, Pará

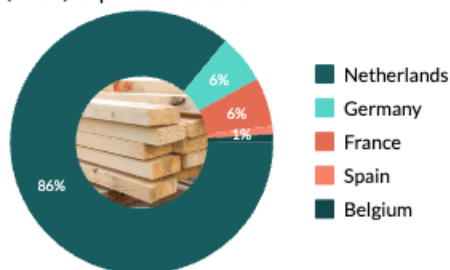
Biome: Amazon (Brazil)

Forest managed: Unknown

Ultimate owner: Unknown, but may involve LR Participações Ltda and members of the Rymcza family

[Link to European buyers](#)

Brasil Exportadora de Madeiras wood (4407) exports to the EU



Top-5 EU importing country

	Netherlands (86%)
	France (6%)
	Germany (6%)
	Spain (1%)
	Belgium (1%)

Top-3 EU importing operators

GWG Houtimport (60%), Van den Berg Hardhout (31%), Houtvisie (4%)
F. Jammes (77%), Peltier (12%), Compagnie des Bois Caraïbes (8%)
Maicuru Hardwoods (100%)
Globaldis Distr Global Materias (100%)
Vogel (100%)

Figure: EU recipient countries and importers of Brazilian sawn wood (HS 4407) from Brasil Exportadora de Madeiras, 2021-2023.
Source: AidEnvironment, based on Brazilian shipment data January 2021 – November 2023.

Sanctions

Year	Sanctions	Amount (BRL)	Details of fines (locations)
2021	-	-	
2022	-	-	
2023	15	278,381	In a series of IBAMA infractions, Brasil Exportadora de Madeiras was fined for allegedly illegally exporting over 1,000 m ³ of processed and sawn tropical hardwoods—primarily Angelim Vermelho, along with Tatajuba, Cumaru, Pequiá, and Cupiuba—without the mandatory export licenses as required by Instrução Normativa IBAMA No. 15/2011. These violations involved destinations including the Netherlands, Belgium, and Portugal. Infractions were recorded in Ananindeua, Pará state, where the company operates. The shipments consisted of decking, beams, sleepers, and slabs.
2024	1	469,042	Selling 1,563 cubic meters of native wood species to the foreign market without a valid license.
2025 (May)	1	8,663	IBAMA indicated that this fine might be considered 'unintentional'. Reportedly, the company transported 28.9 m ³ of processed wood from the species <i>Hymenaea courbaril</i> L. (jatobá) without a valid license, as per Technical Information 212 - Process 02018.003954/2024-96.
Total	17	756,087	

Overview IBAMA imposed environmental fines on Brasil Exportadora de Madeiras since 2021. Source: Brazil's IBAMA [website](#), 2021-2025 (only till May 2025). Note: For many of the indicated fines, the accused company still has the possibility to contest the outcomes, and therefore the status is not yet definitive.

IBAMA sactions imposed on Brasil Exportadora de Madeiras total **BRL 756,087** between 2021-2025



Brasil Exportadora de Madeiras

Business relationships

European wood buyers of Brasil Exportadora de Madeiras:

GWW Houtimport, Van den Berg Hardhout, Houtvisie, F. Jammes, Peltier, Compagnie des Bois Caraibes, Maicuru Hardwoods

Company response: In response to a draft version of this case study shared with a selection of key EU wood buyers in May and June 2025, Van den Berg Hardhout, GWW Houtimport, F. Jammes, and Peltier Bois did not reply. Maicuru Hardwoods replied (15 June 2025) that “it has not been involved in any of the potentially illegal sales that were flagged”. Moreover, the company states that “the fact that there have been no timber embargoes and no sawmill closures among the reported sawmills would seem to indicate, without having reviewed each and every case in the report, that the fines have all or mostly been levied for administrative faults” which is not considered a “red line” for Maicuru. The full response of Maicuru Hardwoods can be found [here](#).

Case description

Little official information is available on Brasil Exportadora de Madeiras, for which a formal website seems to be lacking. Its ownership likely includes LR Participações Ltda and members of the Rymsza family (1). One of the owners, Leandro Rymsza, has been linked to batches of irregular timber while being the chairman of AIMEX, a representation of Pará's timber exporters that (unsuccessfully) tried to “suspend 3,000 administrative proceedings filed by IBAMA for lack of export authorization (Autex) in operations carried out between 2018 and 2019” (2).

Between January 2021 and May 2025, IBAMA imposed 17 fines on Brasil Exportadora de Madeiras for alleged illegal timber operations (see also previous page for more details), totalling BRL 756,087 (about 117,345 Euros) (3). Since these were all imposed after the EUDR cut-off date (30 December 2020), the company and its buyers run the risk of being noncompliant under the legality requirements of the EUDR.

Based on the shipment data sample (4), Brasil Exportadora de Madeiras exported 11,298 metric tons of sawn tropical wood (HS code 4407) to five European countries between 1 January 2021 – 30 November 2023. Most buyers are based in the Netherlands (86%), including GWW Houtimport, Van den Berg Hardhout, and Houtvisie. GWW Houtimport and Van den Berg Hardhout are both based in Lopik, Netherlands, and share a historical connection. GWW Houtimport was established in 1999 as a joint venture between A. van den Berg BV and Adr. Hoogendoorn & Zn. B.V., focusing on supplying FSC and PEFC certified hardwood for ground, road, and water construction projects (5, 6). Van den Berg Hardhout is one of the Netherlands' largest hardwood suppliers. The company imports, machines, and distributes FSC-certified tropical hardwoods for various outdoor applications, including decking, cladding, and street furniture. Their sourcing is primarily from Brazil (5). Houtvisie, founded in 2016, focuses on timber solutions for ground, road, and water construction projects. In 2020, Houtvisie was removed from the FSC certification system due to false claims regarding the certification status of their timber (7). In Houtvisie's website, the company still refers to FSC certified wood, stating that “Houtvisie supplies legal and sustainable wood with, for example, FSC® C-162333 and PEFC/30-32-1029 quality marks.” (8).

- (1) <https://cnpi.biz/23408975000159>, viewed in May 2025.
- (2) De Olho nos Ruralistas (27 September 2023). *The U.S. Port That Is a Leading Destination for Illegal Timber Imports From Brazil's Amazon Rainforest*, viewed in June 2025.
- (3) Brazilian IBAMA website, environmental fines were analysed between 1 January 2021 and 15 May 2025. online: <https://servicos.ibama.gov.br/ctf/publico/areasembargadas/>, viewed in May 2025.
- (4) Brazilian shipment data 1 January 2021 – 30 November 2023, for HS codes 4403 (roundwood), 4407 (sawn wood), 4412 (plywood).
- (5) Website Van den Berg Hardhout, online: <https://www.vandenberghardhout.com>, viewed in May 2025.
- (6) Website GWW Houtimport, online: www.houtindegww.nl, viewed in May 2025.
- (7) FSC (2020), *FSC Suspends Timber Trader in Netherlands for False Claims*, online: <https://fsc.org/en/newscentre/integrity-and-disputes/fsc-suspends-timber-trader-in-netherlands-for-false-claims>, viewed in May 2025.
- (8) Website Houtvisie, online: <https://houtvisiebv.nl/>, viewed in May 2025.

Brasil Norte Ind Com and Exp de Madeiras



Location: Belém, Pará

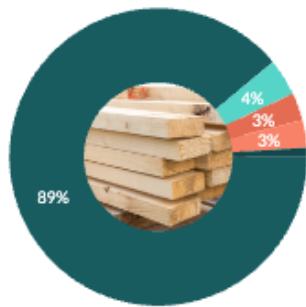
Biome: Amazon (Brazil)

Forest managed: Unknown

Ultimate owner: Unknown, but may involve Danilo Oliveira Gondim and Fernando Santos do Carmo

Link to European buyers

Brasil Norte Ind Com and Exp de Madeiras
sawn wood (4407) exports to the EU



■ Netherlands
■ Belgium
■ Germany
■ France
■ Spain

Top-5 EU importing country

	Netherlands (89%)
	Belgium (4%)
	Germany (3%)
	France (3%)
	Spain (<1%)

Top-3 EU importing operators

Novum Timber (45%), Van den Berg Hardhout (15%), GWW Houtimport (14%)
Vogel (68%), Vandecasteele Houtimport (26%), Robison Lumber (6%)
Maicarú Hardwoods (100%)
Peltier (67%), Guillemette et cie (16%), Tradelink Madeiras (9%)
Ferreira Martins and Filhos Madeiras E Derivados (100%)

Figure: EU recipient countries and importers of Brazilian sawn wood (HS 4407) from Brasil Norte Ind Com and Exp de Madeiras, 2021-2023. Source: AidEnvironment, based on Brazilian shipment data January 2021– November 2023.

Sanctions

Year	Sanctions	Amount (BRL)	Details of fines (locations)
2021	-	-	
2022	2	77,651	The company allegedly exported 182 m ³ of sawn timber without the required export license, as mandated by Brazil's IN IBAMA No. 15/2011, under LPCO E2200028592, as well as transporting 77 m ³ of sawn timber (railway sleepers) under Forest Guide numbers 931468, 931475, 931480, and 931505. The guides falsely listed the species as <i>Aspidosperma pyricollum</i> , but an inspection identified the actual species as <i>Caryocar sp.</i> , indicating a potential false declaration in official documents.
2023	-	-	
2024	-	-	
2025 (May)	-	-	
Total	2	77,651	

Overview IBAMA imposed environmental fines on Brasil Norte Ind Com and Exp de Madeiras, since 2021. Source: Brazil's IBAMA [website](#), 2021-2025 (only till May 2025). Note: For many of the indicated fines, the accused company still has the possibility to contest the outcomes, and therefore the status is not yet definitive.

IBAMA sactions imposed on Brasil Norte Ind Com and Exp de Madeiras total **BRL 77,651** between 2021-2025

Brasil Norte Ind Com and Exp de Madeiras



Business relationships

European wood buyers of Brasil Norte Ind Com and Exp de Madeiras: Novum Timber, Van den Berg Hardhout, GWW Houtimport Vogel, Vandecasteele Houtimport, Maicaru Hardwoods; Peltier Bois, Tradelink Madeiras	Company response: In response to a draft version of this case study shared with a selection of key EU wood buyers in May and June 2025, Van den Berg Hardhout, GWW Houtimport, Vandecasteele Houtimport, and Peltier Bois did not reply. Maicuru Hardwoods replied (15 June 2025) that “it has not been involved in any of the potentially illegal sales that were flagged”. Moreover, the company states that “the fact that there have been no timber embargoes and no sawmill closures among the reported sawmills would seem to indicate, without having reviewed each and every case in the report, that the fines have all or mostly been levied for administrative faults” which is not considered a “red line” for Maicuru. The full response of Maicuru Hardwoods can be found here .
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Case description

According to a Brazilian shipment data sample, Brasil Norte Ind. Com. e Exp. de Madeiras, also known as Brasil Norte Florestal, exported a total of 10,561 metric tons of sawn wood products (HS 4407) to the EU between January 2021– November 2023, notably to the Netherlands (89%), Belgium (4%), Germany (3%), and France (3%). The imports were mainly absorbed by Novum Timber, Van den Berg Hardhout, and GWW Houtimport in the Netherlands; Vogel and Vandecasteele Houtimport in Belgium; Maicaru Hardwoods in Germany; and Peltier in France (1).

Little official information is available on the Brazilian timber company, that does not seem to have a public website. Its owners likely include Danilo Oliveira Gondim and Fernando Santos do Carmo (2). Between January 2021 and May 2025, IBAMA imposed two fines on Brasil Norte Ind Com and Exp de Madeiras for alleged illegal timber operations (see also previous page for more details), totalling BRL 77,651 (about 11,974 Euros) (3). Since these were all imposed after the EUDR cut-off date (30 December 2020), the company and the above-mentioned buyers run the risk of being noncompliant under the legality requirements of the EUDR.

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- (1) Brazilian shipment data 1 January 2021 – 30 November 2023, for HS codes 4403 (roundwood), 4407 (sawn wood), 4412 (plywood).
 (2) <https://cnpj.biz/08179168000207>, viewed online in June 2025.
 (3) Brazilian IBAMA website, environmental fines were analysed between 1 January 2021 and 15 May 2025. online: <https://servicos.ibama.gov.br/ctf/publico/areasembargadas/>, viewed in May 2025.

Fazenda Santa Rita de Cássia



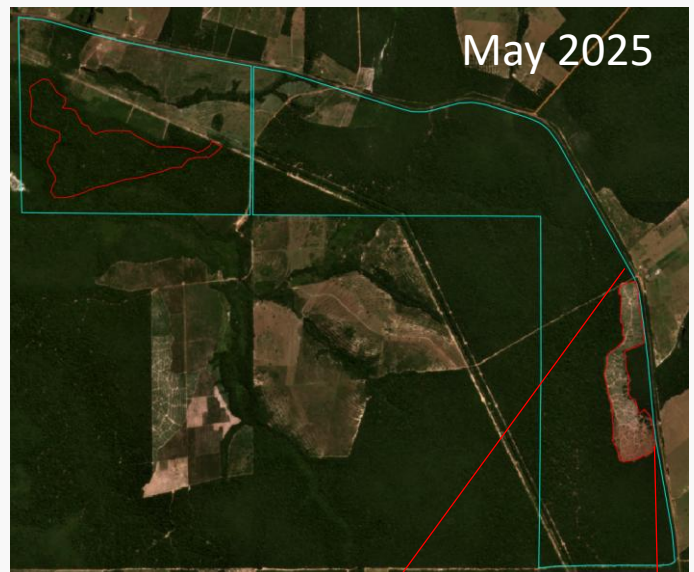
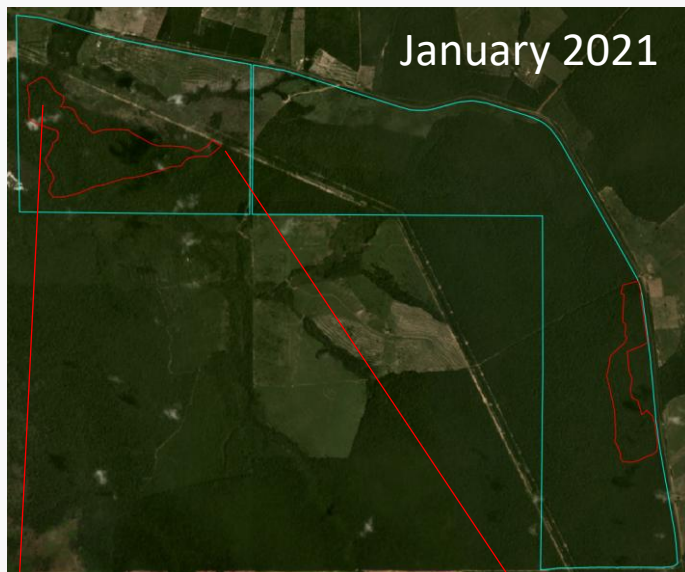
Location: Pimenta Bueno, Rondônia

Biome: Amazon (Brazil)

Cleared area (ha): 244 (2021-2025)

Coordinates property: -12,03795, -60,81550

Clearing details



Imagery: Farm boundaries (in blue) of Fazenda Santa Rita Cássia (a.k.a. Lote 14 - Gleba 05 - Corumbiara) in Pimenta Bueno, Rondônia. The red polygons demonstrate deforestation and degradation of 244 ha of the vegetation type “transition area between Forested Savanna and Rainforest” between 2022 and 2025, of which 159 ha in the left image polygon and 85 ha in the right image polygon. Source: AidEnvironment, based on rural cadastre data (SIGEF and CAR) and ©2025 Planet Labs Inc.



Imagery: Before and after images of Fazenda Santa Rita Cássia. Image © Planet Labs.



All (244 ha) native vegetation cleared falls into the FAO Forest definition and is **non-compliant** with the EUDR



Fazenda Santa Rita de Cássia

Ownership & Business relationship

Owner: Valdinei Correa Pereira	Company response: In response to a draft version of this case study shared with JBS and Marfrig on 12 June 2025, JBS states that: “all wood purchases are made with the issuance of invoices that are, by law, mandatorily accompanied by the required documentation, such as the DOF (Documento de Origem Florestal – Forest Origin Document). The DOF is certified by Ibama, which verifies the circulation of goods throughout the supply chain in accordance with environmental regulations.” Marfrig stated (30 June 2025) that “the information presented does not reflect the company’s procedures. The facility in question has not been operated by Marfrig since October 2024. Furthermore, Marfrig has consistently upheld rigorous environmental responsibility standards across all its production units.” Marfrig’s full response can be read here .
Brazilian buyers of wood: JBS, Marfrig, Amaggi, Indusparquet	
European buyers of wood: CPF Parquet, United Construction Products, BRW Floors, Planchers De Bois Exotique	

Case description

This case, investigated in partnership with Repórter Brasil (1), highlights how a timber producing farm with legality violations is likely linked to the main beef producers in Brazil: JBS and Marfrig. The meatpackers have been indirectly purchasing timber from a farm where the Brazilian authorities identified deforestation and the use of enslaved workers. JBS reports to use wood biomass as fuel for its industrial boilers (2).

In September 2019, federal government inspectors rescued 17 workers from conditions analogous to slavery at the Santa Rita de Cássia farm (a.k.a. Lote 14 - Gleba 05 – Corumbiara), a 2,223 hectares farm in Pimenta Bueno, Rondônia. The workers were clearing native forest and loading logs onto trucks. The inspection team reached the group following a report of a worker’s death at the site - he was struck by a tree during deforestation. The workers, all employed informally, were reportedly (3) found in degrading labour conditions, exposed to imminent risk of accidents, and lacking proper protective equipment. Initially, they were sleeping out in the forest, but reported that after their coworker’s death, the employer removed them from the area and brought them to the main part of the farm, fearing an inspection might take place. Moreover, the precarious conditions recorded by the inspectors did not change. The workers were not allowed to use the farm’s sanitary facilities and were forced to relieve themselves in the woods. Drinking water was taken from a nearby stream. Additionally, they were sleeping on the ground or in tents. The farm owner and employer responsible for the labour, Valdinei Correa Pereira, was added to the Brazilian “dirty list” of slave labour three years after the inspection, in October 2022 (4).

In 2019, the Rondônia State Environmental Department embargoed 205 hectares within the Santa Rita de Cássia farm due to environmental violations found on the property (5). The Santa Rita de Cássia farm has received approval for clearance of 489 hectares of vegetation between 18 November 2021 - 2022 (6). In May 2025, 244 hectares have been cleared of vegetation type “transition area between Forested Savanna and Rainforest”. Ongoing clearing is expected based on visual confirmation.

Data obtained shows that in 2022 and 2023, slaughterhouses in Rondônia belonging to JBS and Marfrig - the two largest beef producers in Brazil - purchased firewood and wood residues from various sawmills supplied by the Santa Rita de Cássia farm, even after the farm had been added to the “dirty list” (7). Other major companies that acquired wood or wood residues from sawmills supplied by the farm include Amaggi, Gazin Colchões - one of Brazil’s largest mattress manufacturers - and Indusparquet, a major exporter of wooden flooring to the U.S. and Europe.

Between 2022-2023, Indusparquet has exported various wood products (e.g. HS 4409, HS 4418) to buyers in France (e.g. CPF Parquet), the U.S. (e.g. United Construction Products, BRW Floors), and Canada (e.g. Planchers De Bois Exotique) (8).

- (1) <https://reporterbrasil.org.br>
- (2) JBS CDP Forests questionnaire 2022, online: https://www.jbs.com.br/storage/2023/10/2022_Forests.pdf, viewed in June 2025.
- (3) Labour inspection report, online: <https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/relatorios-op-2019/op-73-de-2019-fazenda-santa-rita-de-cassia-v-c.pdf>, viewed in June 2025.
- (4) The “dirty list” edition including the employer’s name, online: https://reporterbrasil.org.br/wp-content/uploads/2024/04/cadastro_de_empregadores-050424.pdf, viewed in June 2025.
- (5) Rondônia’s environmental state department (available upon request).
- (6) Forest exploitation permit for the area (available upon request).
- (7) Forest Origin Documents (undisclosed).
- (8) Brazilian shipment data, filtered for Indusparquet exports between 1 January 2022 and 30 November 2023.

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