November 2025

Compliance Checker
Company Profile

FRIGOL

Five likely noncompliance case studies linked to FriGol’s cattle operations in Brazil

aid environment

Executive summary

This sustainability risk profile of FriGol – one of the top-5 largest meatpackers in Brazil indirectly linked to leather products in various luxury fashion brands in Europe – 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 sustainability risk profile analyses FriGol's links to forest-risk commodities in the scope of the EU regulation on deforestation-free products (EUDR). The analysis maps FriGol's cattle sourcing areas, its link to deforestation hotspots, and the location of assets and infrastructure (slaughterhouses and indirect connected tanneries) linked to the company's commodities' imports into the European market. Key element of the report is the demonstration of five potentially noncompliant* ***case studies on cattle farms linked to FriGol and associated tanneries,*** *that might be noncompliant with the EUDR if the beef (directly) or leather (indirectly) from these cleared farm plots would enter the EU market when the law enters effect. The five cases together* ***cleared 1,483 hectares of native vegetation****, corresponding with* ***785,247 tons of carbon emissions****, since the EUDR's cut-off date. The report's case studies have been shared with FriGol (and for some cases with meatpacker JBS) for further engagement on 2 October 2025, and the companies' responses have been integrated into the report. FriGol's full response can be read* *here*.

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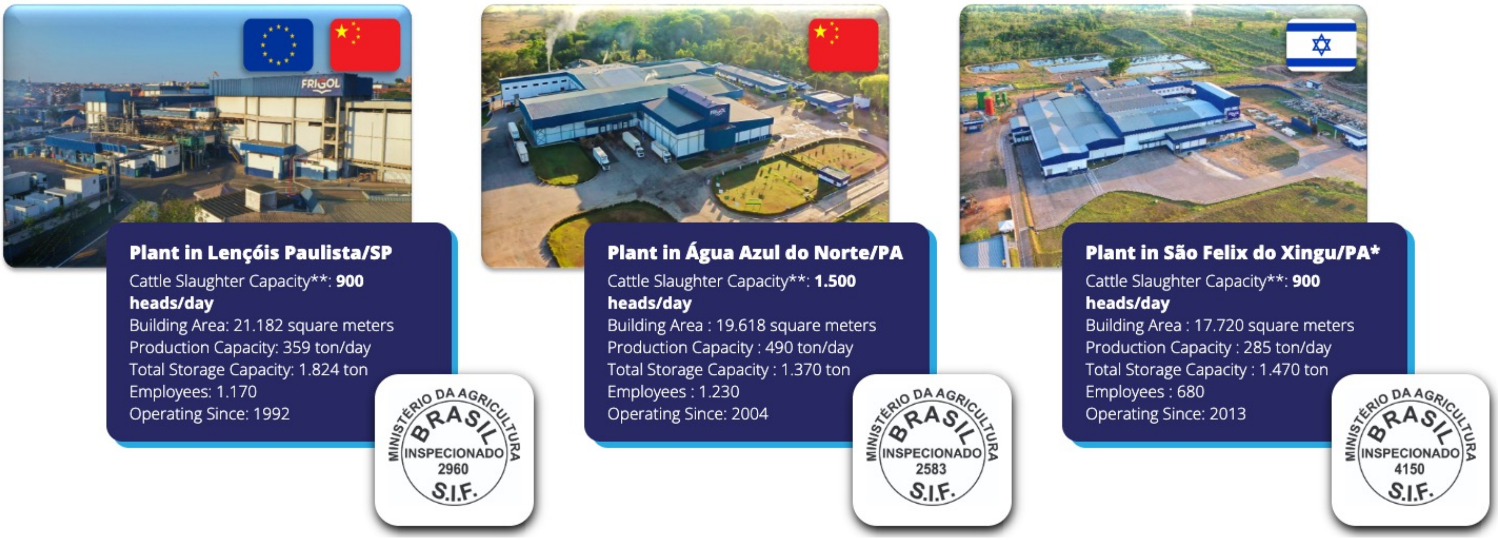
FriGol: Deforestation-risk commodities

FriGol: One of the top-5 Brazilian meatpackers with exports to Europe

The Brazilian meatpacker company FriGol, founded in 1992, but stemming from the Gonzaga Oliveira family business since 1970, is headquartered in Lençóis Paulista, São Paulo. The company operates two cattle processing plants in Pará: Água Azul do Norte and São Félix do Xingu, and one in São Paulo: Lençóis Paulista (Figure 1). According to FriGol, since 2004, the company is licenced to export beef to the European Union (EU), but exclusively from its Lençóis Paulista facility (SIF code 2960) in São Paulo. This is confirmed in the EU TRACES system. In Brazil's SIF system, the Pará slaughterhouses are licenced to export to various countries in South America, North Africa, and Asia, including Peru, Egypt, Paraguay, Argentina, China, Japan, Morocco, and Cuba, but Europe is not included. FriGol seems to source only from Brazil.

Figure 1: Screenshot of FriGol's operational structure and capacity.
Source: website FriGol, viewed in July 2025.



The company employs roughly 3,300 staff, slaughters around 665,000 head of cattle annually, equivalent to about 150,000–160,000 tonnes of beef in 2024 and generated approximately BRL 3.5 billion net revenue (≈ EUR 555 million) in 2024. While this places FriGol among Brazil's top five meatpackers, its scale remains modest compared to meatpacker giants like JBS, Marfrig, and Minerva—with FriGol processing less than 2% of JBS's annual cattle volume.

FriGol's forest-risk direct and indirect commodities in scope of the EUDR

With regards to commodities under scope of the EUDR and exports to the EU, FriGol directly exported various beef products to the EU between 2021-2023, in particular **frozen beef** (HS code 0202), which according to a shipment sample of FriGol's Brazilian beef exports to eight EU27 countries (Spain, Belgium, Netherlands, Italy, Cyprus, Greece, Germany and Portugal), equalled 83% of all the company's exports to the EU. Other than that, FriGol also exported **fresh beef** (HS code 0201), which equalled 17% of all the company's exports to these eight EU countries in this period.

A recent investigation of Earthsight (2025) revealed that FriGol indirectly supplies the leather industry in Europe through Brazilian leather producer Durlicouros, that exports **tanned or crust (wet blue) bovine hides & skins** (HS 4104) and **prepared bovine leather** (HS 4107) to Italy. Reportedly, Durlicouros shipped over 14,700 tonnes of leather from Brazil's Pará state to Italy between 2020 and 2023.

FriGol: Relevant sustainability policies and gaps

FriGol commitment: 100% monitoring of direct suppliers, aim for 100% indirect by 2030

FriGol reports to monitor 100% of its **direct cattle suppliers** across all (Brazilian) biomes where they operate. Moreover, the company aims to monitor 100% of its **indirect suppliers** by 2030.

The company further aims to achieve 100% monitoring of its "**Level 1 indirect suppliers**" by the end of 2025 through the Visipec traceability system.

However, a recent investigation by Earthsight has linked FriGol to the (indirect) purchasing of cattle "raised in illegally deforested areas and also laundered from within the Brazilian Apyterewa Indigenous Territory". Tier or Level-1 indirect suppliers cover only a portion of FriGol's total indirect suppliers, as "cattle supply chains in Brazil frequently contain several more tiers". A study by Visipec highlights that companies can only reach 100% deforestation risk monitoring in their supply chain if they include Tier-1 and Tier-2 indirect suppliers in the screening process. Since FriGol does not trace most of its indirect suppliers, especially not beyond Tier-1, its supply chain is exposed to the widespread threat of 'cattle laundering' – the practice of moving cows from illegal farms to 'clean' farms before selling them on to slaughterhouses.

In response to Earthsight's findings, FriGol highlighted that "its procurement policy is in line with a monitoring protocol for sourcing cattle developed by NGO Imaflora and Brazil's Federal Prosecutor's Office". Moreover, "FriGol said 68 per cent of cattle moving from the indirect suppliers it checked were found to be compliant with its requirements. FriGol did not provide detail on these requirements, but company documents indicate they align with the Indirect Suppliers Working Group for Brazilian Ranching (GTFI) Standard, which includes criteria related to deforestation, embargoes, slave labour, and invasion of Indigenous Territories, among others. FriGol's response therefore suggests one-third of cattle from its Tier-1 suppliers did not meet these requirements."

In response to a draft version of this report, FriGol reaffirmed (October 22, 2025) that "*all our cattle purchases comply with our Socio-environmental Monitoring Policy. As a signatory to the TAC da Carne Legal (Legal Beef Conduct Adjustment Agreement) in the state of Pará, FriGol utilizes the Boi na Linha (Beef On Track) Protocol for monitoring its direct suppliers. If a supplier does not meet these criteria, they are blocked and will not be able to supply FriGol*." Frigol's full response can be found here.

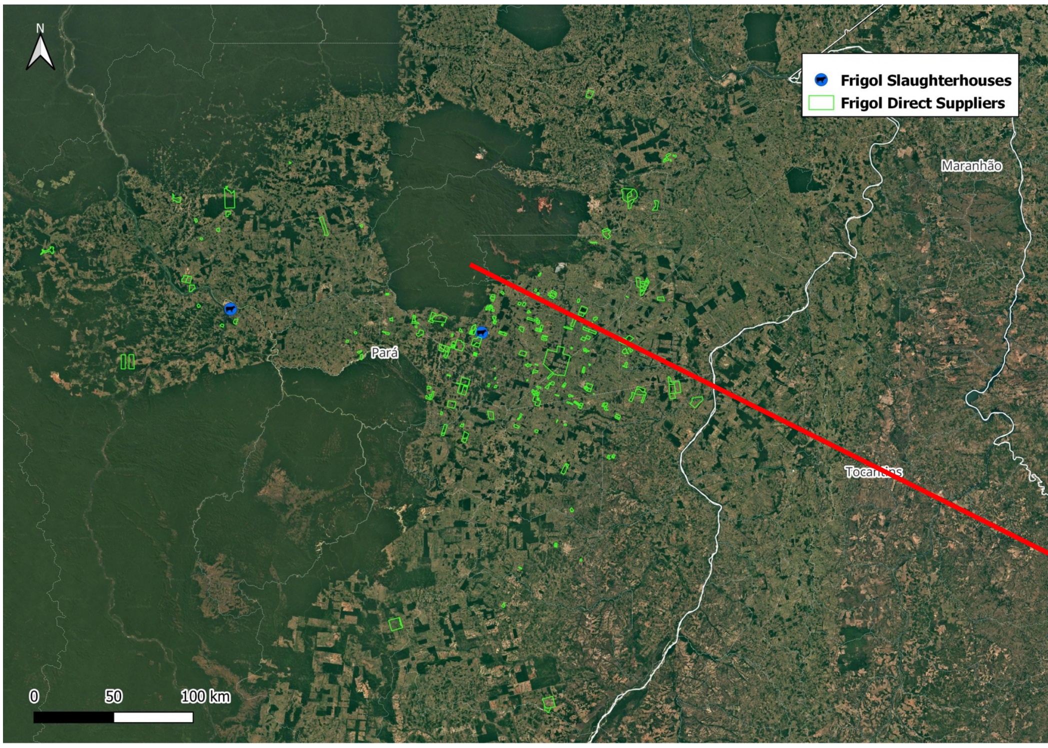
In 2024, Durlicouros and FriGol reported to join forces "to achieve full leather traceability, which aims to reach 100% of indirect suppliers. This represents the slaughter of the first batch with guaranteed indirect suppliers at FriGol in Água Azul do Norte, in parallel with Durlicouros in Xinguara, Pará, with the guarantee that they originated from areas that comply with the criteria defined by the PRIMI Protocol" [translated from Portuguese, ed.]. The PRIMI protocol, launched in November 2023, establishes standards for traceability and socio-environmental monitoring of indirect suppliers at all stages, from farms to processing plants to tannery production. The two companies reportedly will work on an integrated traceability platform using blockchain technology. The timelines for this endeavour are not mentioned in the article, but will, in line with the above sustainability commitments, likely aim for 2030 for full monitoring of all indirect suppliers.

FriGol – Beef operations

FriGol's high-risk sourcing origins and assets for cattle in Brazil

FriGol seems to only source from Brazil, therefore it is relevant to assess the company's infrastructure prone to deforestation risk in this country. The company operates three processing plants, two in Pará (Figure 2 below), and one in São Paulo. The slaughterhouses in Pará have a higher risk to be directly connected to tropical deforestation considering their location in the Brazilian Legal Amazon and in the deforestation frontier.

FriGol's cattle suppliers and slaughterhouses in Brazil



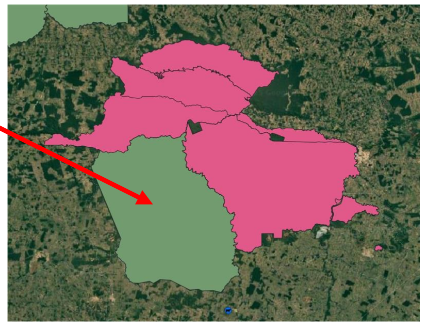
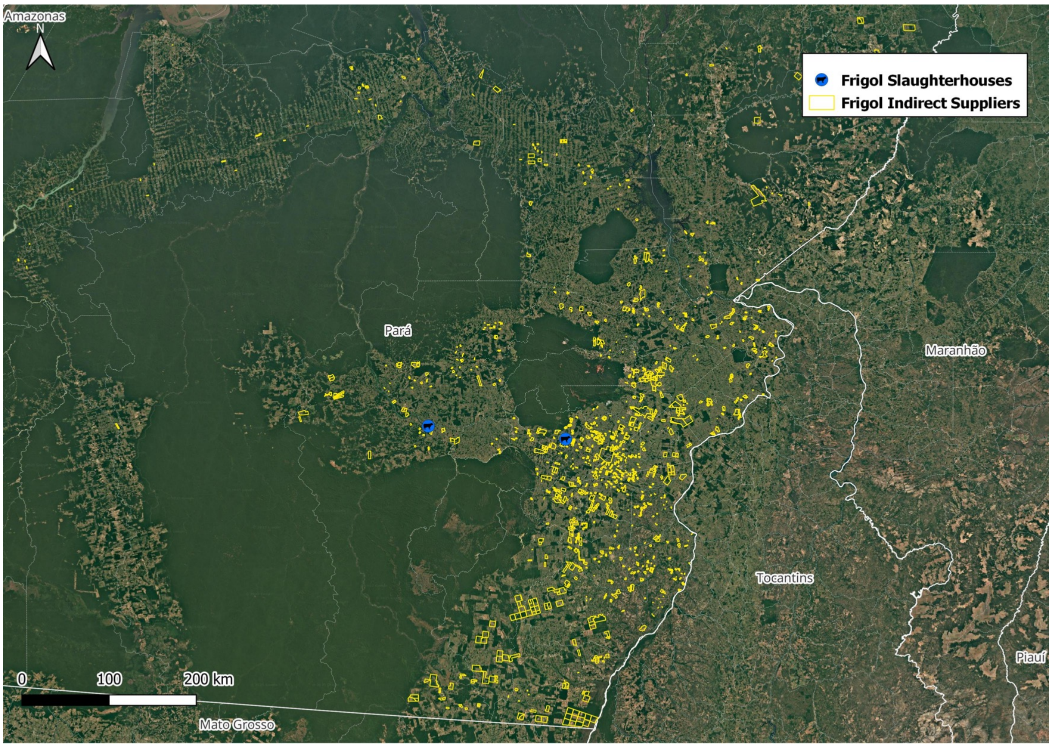


Figure 2: Locations of FriGol's slaughterhouses in Pará (Brazil), as well as the locations of an identified sample of 257 direct (on top) and 1,466 indirect (at the bottom) suppliers of FriGol in Pará. Source: AidEnvironment, based on rural cadastre data from the Brazilian Ministry of Agriculture and animal transportation permits (GTA).



The map above shows that direct and indirect suppliers of FriGol in Pará are adjacent to indigenous territory Xikrin do Rio Catete territory (Kayapo etnia) (in green). The other areas (in pink) are conservation units, six in total: Reserva Biológica Do Tapirapé, Parque Nacional Dos Campos Ferruginosos, Floresta Nacional De Carajás, Área De Proteção Ambiental Do Igarapé Gelado, Floresta Nacional De Tapirapé-aquiri, Floresta Nacional De Itacaiunas. Source: AidEnvironment, based on Funai and MMA, 2025.

AidEnvironment's unique sample of direct and indirect suppliers of key meatpackers in seven Brazilian states reveals that **FriGol's indirect supply base is most at risk, in terms of deforestation-risk and being in vicinity of indigenous territories, in Pará**, a state in the Brazilian Amazon (Figure 2). FriGol's indirect supplier base in Pará poses a significant deforestation risk, since the monitoring of indirect cattle supply chains is troubled by gaps and delays (see also previous policy page), and full monitoring of FriGol's indirect supply chain is only considered implemented by 2030.

FriGol's Brazilian beef exports to and importing operators in the EU27

According to Brazilian shipment data, between 1 January 2022 and 30 November 2023, FriGol exported **1,572 metric tons (MT) of frozen beef** (HS 0202) and **fresh or chilled beef** (HS 0201) to the 27 EU member states (of which only eight EU countries showed imports, see Figure 3 below). These volumes should be seen as a representative sample, which does not necessarily cover all traded volumes (a methodology document can be shared on request). According to FriGol, its beef exports to the EU originate exclusively from its Lençóis Paulista slaughter facility (SIF code 2960) in São Paulo, as it cannot export to the EU from its Pará facilities. This was confirmed in the beef sample; all beef to the EU27 originated from Santos' port in São Paulo. On the contrary, some batches of beef with final destination China originated from the Vila do Conde port in Pará.

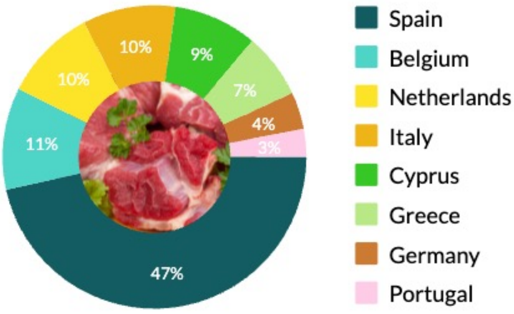


Figure 3. FriGol beef exports to the EU27. Source: AidEnvironment, based on a sample of 1,572 metric tons of frozen (HS 0202) and fresh beef (HS 0201) exports to the EU27 between 1 January 2021 and 30 November 2023, filtered for shipper FriGol. In this sample, 83% represented frozen beef, and 17% fresh beef products.

Top-5 EU importing country	Top-3 EU importing operators
Spain (47%)	Silca (36%), Apetit Group (29%), Merlo Ercole (11%)
Belgium (11%)	Intervlees (100%)
Netherlands (10%)	FN Global Meat (58%), Apetit Group (34%), Verwijs Group (7%)
Italy (10%)	Silca (33%), Merlo Ercole (33%), Inalca Group (17%), Rufcarni (17%)
Cyprus (9%)	Dener Overseas (100%)

Company Silca, an Italian meat trader that began importing fresh bovine meat from South America in 2007, is considered as one of the European meat importers with the highest embedded carbon footprints. Despite Intervlees' central role in importing meat from Brazil (e.g from Marfrig, Minerva, and FriGol), the company does not have any public disclosures or traceability commitments addressing deforestation or social impacts in Brazil. As such, Intervlees remains exposed to risks like cattle laundering, illegal deforestation, Indigenous land dispossession, and greenhouse-gas emissions associated with beef import. FN Global Meat is one of the Netherlands' largest meat importers from Brazil, also importing bovine meat from JBS and Marfrig. Parent company Gruppo Cremonini of Inalca Group scores very poorly on environmental and social metrics of the World Benchmark Alliance Food & Agriculture section, raising concerns about little transparency and ongoing negative impacts across its supply chain.

FriGol – indirect linkages to leather

Leather tanneries linked to FriGol

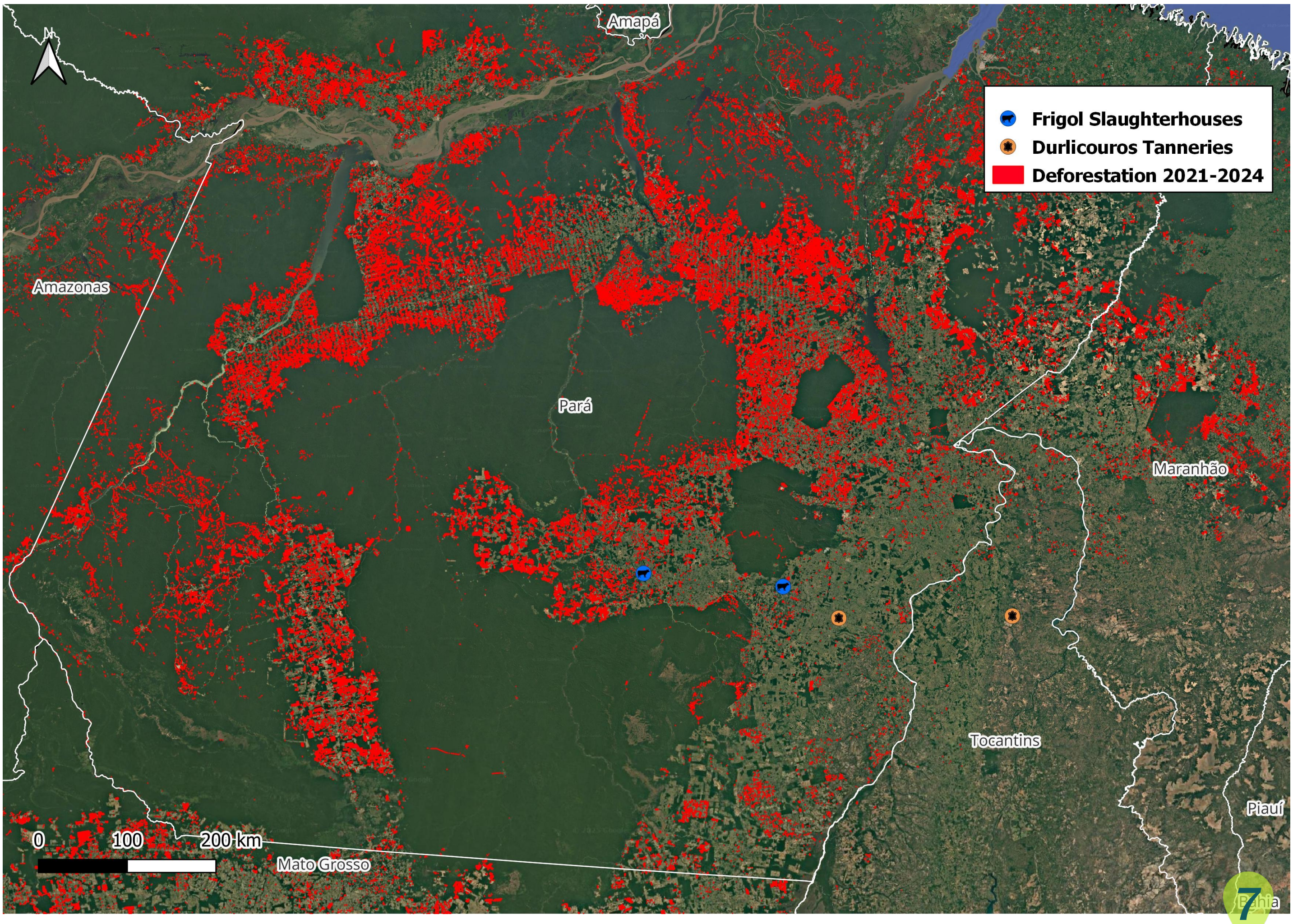
FriGol – Durlicouros in Brazil

Durlicouros' tannery in Xinguara, Pará is the closest leather tannery to FriGol's slaughterhouses in Pará (approx. 67 KM to FriGol's Água Azul do Norte slaughterhouse) (Figure 4 below). Moreover, a tannery of Curtume do Pará in Xinguara in Pará is within a 100 KM radius of the FriGol slaughterhouse, while JBS has a tannery in Marabá (approx. 175 KM to FriGol's Água Azul do Norte slaughterhouse).

While there are various sources (e.g. Durlicouros, 2024; Earthsight, 2025; social media, 2024) **confirming the supplier-buyer relationship between the FriGol's Água Azul do Norte slaughterhouse in Pará and Durlicouros' tannery in Xinguara, Pará** (Figure 5), there is no documented evidence that Curtume do Pará and JBS (Marabá) source hides from FriGol. However, considering proximity, Curtume do Pará (also approx. 70 KM) may also source from FriGol.

Figure 4. Location of Durlicouros tanneries and FriGol slaughterhouses, close to Amazon deforestation areas. Source: AidEnvironment, based on data from the Brazilian Ministry of Agriculture; Prodes (2021-2024). We plotted the locations of Durlicouros tanneries and FriGol slaughterhouses in Pará, one of Brazil's major deforestation frontiers.

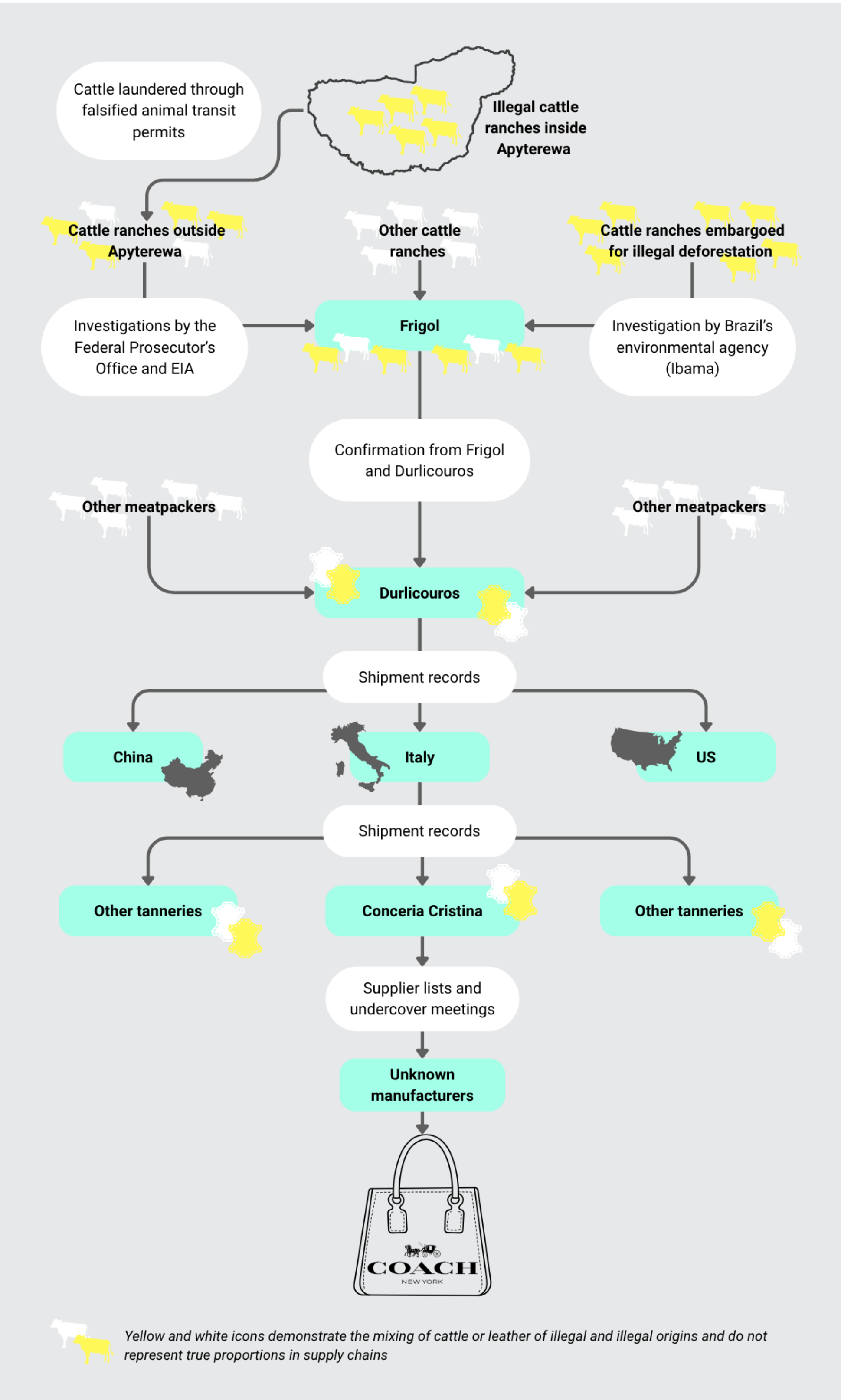
Figure 5. Screenshot of a social media post about the collaboration between Durlicouros and FriGol. The media post connects FriGol's slaughterhouse in Água Azul do Norte with Durlicouros' tannery in Xinguara (Pará). Source: Instagram, 16 February 2024. Online: https://www.instagram.com/reel/C3abx0vst38, viewed in August 2025.



FriGol- Indirect linkages to leather

FriGol’s indirect linkages to European luxury fashion brands

FriGol indirectly supplies the leather industry in Europe through Brazilian leather producer Durlicouros, that exports **tanned or crust (wet blue) bovine hides & skins** (HS 4104) and **prepared bovine leather** (HS 4107) to Italy. Reportedly, Durlicouros shipped over 14,700 tonnes of leather (from Pará) to Italy between 2020 and 2023.



According to the recent Earthsight investigation, **Conceria Cristina (Gruppo Peretti)** and **Faeda** (both in Veneto, Italy) bought nearly a quarter of Durlicouros’ exports from Pará to Italy between 2020 and 2023 (Figure 6).

Downstream luxury brands supplied by one or both of these tanneries include **Coach** (identified by Earthsight as a regular buyer per an undercover meeting), **Fendi** (LVMH), **Chloé** (Richemont), **Hugo Boss**, **Louis Vuitton** (LVMH), **Chanel**, and Kering brands **Gucci, Balenciaga, Saint Laurent.**

Several brands disputed that the leather they bought from these tanneries was Brazilian or said they have tightened traceability (e.g., Chanel allegedly ended its Faeda partnership in early 2024).

Earlier AidEnvironment-Rainforest Foundation Norway investigations also revealed business relationships between Faeda and the automotive upholstery sector.

Figure 6. Recent investigation of Earthsight (2025) confirms the supply chain links between FriGol, Durlicouros, and fashion brand Coach in Europe. Source: Earthsight (2025), The Hidden price of luxury. Online: https://www.earthsight.org.uk/news/hidden-price-luxury, viewed in July 2025.

FriGol Cattle Cases

Five likely noncompliant cattle case studies potentially linked to FriGol

This section covers five case studies of cattle farms with likely forest clearing since the EUDR cut-off date, potentially linked to FriGol and associated tanneries, that might be noncompliant with the EUDR if the beef (directly) or leather (indirectly) from these cleared farm plots would enter the EU market when the law enters effect (Figure 7). The cases cover case studies of deforestation and legality issues on various Brazilian cattle farms since the EUDR cut-off date (31 Dec 2020).

The report's case studies have been shared with FriGol (and with JBS that was also linked to a couple of cases in the report) for further engagement on 2 October 2025, and the companies' responses have been integrated into the report.

FriGol cattle case	Name property	Owner	Location (all in Brazil)	Page
1	Fazenda Granada II	Dirceu Luiz Flumian & Jane Margaret Droppa Flumian	Santana do Araguaia, Pará/ Santa Terezinha- Mato Grosso	10
2	Fazenda Paraíso da Central	Gilsani Naufel Guimaraes	São Félix do Xingu, Pará	12
3	Fazenda Santa Tereza	Bento Carlos Liebl	São Félix do Xingu, Pará	14
4	Fazenda São Luiz	Luiz Antônio Zapparoli Sacarelli	Ourilândia Do Norte - Pará	16
5	Fazenda Santa Fé	Alexandre Dias Olivo	São Félix do Xingu, Pará	18

Figure 7. Overview of cattle case studies potentially linked (direct or indirect) to FriGol in this company profile

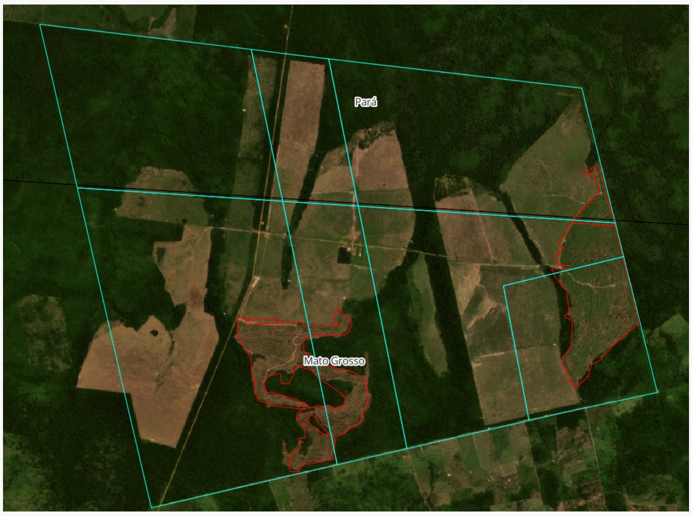
Fazenda Granada II

Location: Santana do Araguaia, Pará/ Santa Terezinha-Mato Grosso
Area property (ha): 5,727

Biome: Amazon (Brazil)
Coordinates property: -9.8138, -50.5476

Cleared Area			
502	hectares	**Period clearance:** July 2021 – April 2022	**Type of vegetation:** Open-canopy rainforest, submontane (also known as Open Submontane Humid Forest)
229,252	tons of CO_2		

July 2021



April 2022

Imagery: An area of approx. 1,684 ha were cleared by fire in September 2024. The photo shows active fire on September 1st, 2024. Man-made, controlled fires are often used for the preparation of the land after deforestation. Source: Copernicus browser.

Imagery: Before and after clearing of 502 ha in Fazenda Granada II. The blue lines represent the farm boundaries, the red polygons the cleared areas. Source: AidEnvironment. Imagery ©2025 Planet Labs Inc.

All the **502 ha** of native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**

Imagery: Screenshot of Mapbiomas deforestation alerts in the farm. Mapbiomas Alerta confirms the clearing in the left 'alert polygon' and right 'alert polygon'. Source: MapBiomas, August 2025.

Fazenda Granada II

Ownership & Business relationship

Owners:	Company responses:
CAR: MT-5107776-ADBDD57B282847E59D22D1F69CFD4510 **Grupo Gouveia** / Gouveia Holding e Agropecuária Ltda Dirceu Luiz **Flumian** Jane Margaret Droppa **Flumian**	In response to a draft version of five beef/leather case studies shared with FriGol and JBS on 2 October 2025, **Frigol stated** (22 October 2025): *"FriGol has never purchased from Fazenda Granada II, located in the state of Mato Grosso. The only property owned by Dirceu Flumian known to FriGol is Fazenda Granada, in the state of Pará, which has no embargoes or any associated socio-environmental issues, in accordance with the criteria of the Beef on Track Protocol. This property supplied FriGol in 2018, 2019, and 2023 – all prior to the deforestation reported in September 2024, caused by man-made fires, as mentioned by Aid Environment."* AidEnvironment believes that Frigol's response deflects responsibility by focusing narrowly on direct purchases, while ignoring common practice in Brazil that adjacent farms with similar ownership exchange cattle to mask deforestation or embargoes in one of the properties and only sell from the "clean" property. Moreover, Fazenda Granada II is also partly located in Pará, and deforestation occurred between July 2021 and April 2022, followed by fire in September 2024. **JBS stated** (23 October 2025): *"AidEnvironment failed to demonstrate the movement of cattle from the aforementioned farms to JBS facilities. None of them are JBS suppliers."* However, follow-up questions from AidEnvironment revealed that JBS was only referring to its direct purchases from the alert cases, while confirming that the indirect farms mentioned in the cases studies (here: Fazenda Granada) are direct suppliers of JBS, reportedly "*all in compliance with industry protocols and the company's responsible raw material purchasing policy*". This is ignoring the well-documented indirect cattle transfers potentially linking JBS to deforestation at Fazenda Granada II.

Environmental sanctions

Embargoes:	No	Historical embargoes. In 2021, part of Fazenda Granada II (in Santa Terezinha municipality, the Mato Grosso part of the farm) was embargoed for destroying 777 ha of Amazon vegetation using fires (see fines). However, there seems to be no current embargo in the farm (Mapbiomas). Another embargo was issued in 2018 for clearing 2,337 ha in the Pará-site (Santana do Araguaia) of the farm.
Environmental fines:	Yes	Since 2021, IBAMA fined the owners of Fazenda Granada (II) two times, totaling BRL 17.1 million, for clearing thousands hectares of Amazon forest, of which BRL 5.8 million in Fazenda Granada II (destruction of 777 ha Amazon vegetation using fires) and BRL 11.3 million in municipality Brasília for preventing or hindering "the natural regeneration of native Ombrophilous Forest in an area previously embargoed by IBAMA (TE 439532-C)."

Case description

Fazenda Granada II, located in both Santa Terezinha (in Mato Grosso) and Santana do Araguaia (Pará) municipalities, has cleared 502 ha of open-canopy rainforest since the EUDR cut-off date of 31 December 2020, which can all be classified as forest under the definitions used by the EUDR (1). Mapbiomas Alerta confirms the clearing in the farm, without an environmental license (2). Much of the clearing was followed by man-made fire razing in September 2024, covering an enormous area of 1,684 ha (see also previous page).

According to Mapbiomas Alerta there are no current embargoes in the self-declared Rural Environmental Registry (CAR) system by owners Dirceu Luiz Flumian and Jane Margaret Droppa Flumian (2; 3). The Flumian family owns the company DJFlumian e Filhos Agropecuária, a livestock farming company registered in Goiânia (GO) and with a unit in Santana do Araguaia. There have been historical embargoes in parts of the farms declared by these owners, including Fazenda Granada II, for which IBAMA fined them for more than BRL 17 million (4). Ownership of the farm seems to be contested. There are indications that Grupo Gouveia purchased Fazenda Granada II in 2021, however, there has been an BRL 44 million outstanding payment, and therefore formal registration of ownership transfer may not have been finalized (5). Grupo Gouveia operates across several economic sectors—agribusiness, fuel distribution, healthcare, and construction (6), including livestock and farming and acquiring undervalued rural properties for future appreciation and resale. Banco Santander is one of the financiers of Grupo Gouveia (5). The CAR number (see above) is also declared by Gouveia Holding e Agropecuária Ltda, but that CAR is classified as "suspended" and "under regularization" (7). The company filed for bankruptcy protection in 2024 but failed in its attempt (8).

Fazenda Granada (similar ownership), the property adjacent to Fazenda Granada II, directly supplied FriGol's slaughterhouse Água Azul Do Norte in Pará in 2018, 2019, and 2023 according to FriGol's response to this report, therefore all prior to the deforestation by fire in 2024 (but the initial clearing already happened in 2021-2022). Moreover, Fazenda Granada supplied JBS in Santana do Araguaia in Pará between November 2024 and May 2025 (9). Since the two "Fazenda Granada" properties are connected by roads, allowing for easy cattle exchange, there is substantial risk that cattle from Fazenda Granada II have entered the supply chains of FriGol and JBS. A recent investigation of Earthsight (2025) revealed that FriGol likely indirectly supplied bovine hides to the leather industry in Italy through Brazilian leather producer Durlicouros, that indirectly, through Italian tanneries Conceria Cristina and Faeda, supplied European high-fashion brands such as Coach (see also page 8 of this report) (10). These European operators and downstream brands may have been (indirectly) linked to the noncompliant farm reported in this case. Continued (indirect) sourcing from this farm with deforestation after the EUDR cut-off date may also create future noncompliance issues under the Regulation. Also, under Brazilian law this case implies irregularities and noncompliance (2).

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in August 2025.
(2) Mapbiomas Alerta, online: https://plataforma.alerta.mapbiomas.org, with CAR-number MT-5107776-ADBDD57B282847E59D22D1F69CFD4510, viewed in August 2025.
(3) https://geoportal.sema.mt.gov.br, viewed in August 2025.
(4) Ibama, online: https://servicos.ibama.gov.br/ctf/publico/areasembargadas/ConsultaPublicaAreasEmbargadas.php, viewed in March 2025
(5) Court Rondonópolis, Mato Grosso (no. 1039387-13.2023.8.11.0003), online: https://recuperacaojudicial.pansieriadvogados.com.br/uploads/files/7451821dc31cab9a12108312a0b5f91c.pdf, viewed August 2025.
(6) Company website, online: https://grupogouveia.com/, viewed in August 2025.
(7) Environmental Agency of Mato Grosso (Sema-MT) database (evidence available upon request)
(8) https://www.comprerural.com/grupo-tenta-manobra-alegando-r-617-milhoes-em-dividas-e-juiz-anula-rj/, viewed in September 2025.
(9) Animal Transit Data from the Agricultural Defense Agency of the State of Pará (Adepará) (undisclosed).
(10) Earthsight (2025), online: https://www.earthsight.org.uk/news/hidden-price-luxury, viewed in August 2025.

Fazenda Paraíso da Central

Location: São Félix do Xingu, Pará
Area property (ha): 1,402

Biome: Amazon (Brazil)
Coordinates property: -6.3350, -52.9909

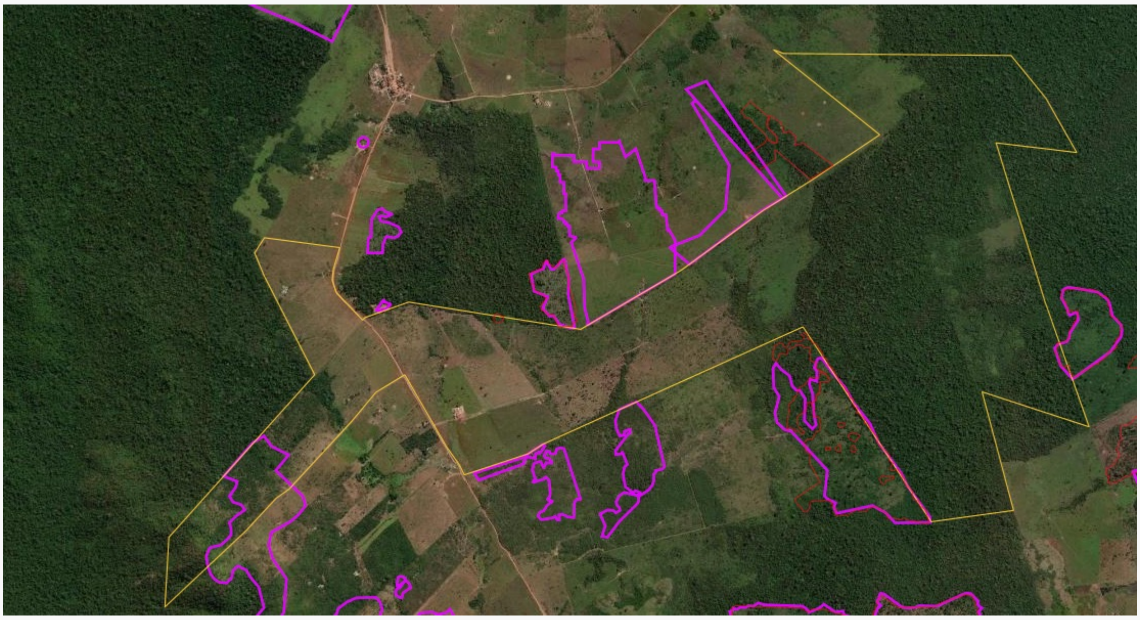
Cleared Area			
22	hectares	**Period clearance:** Aug-Oct 2023	**Type of vegetation:** Open-canopy rainforest, submontane (also known as Open Submontane Humid Forest)
10,964	tons of CO_2		

August 2023

Imagery: Before and after clearing of 22 ha in Fazenda Paraíso da Central. The blue lines represent the farm boundaries, the red polygons the cleared areas. Source: AidEnvironment. Imagery ©2025 Planet Labs Inc.

October 2023

About **7.5 ha** of native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**



Imagery: Screenshot of Mapbiomas of Fazenda Paraíso de Central. In red the deforestation alerts, in purple the embargoed areas. Mapbiomas Alerta does not directly confirm the small clearing areas visualised above. Source: MapBiomas, August 2025.

Fazenda Paraíso da Central

Ownership & Business relationship

Owner: Gilsani Naufel Guimaraes PA-1507300-55086EAA3DE841229204DE5B0030B04A	**FriGol response:** In response to a draft version of five beef/leather case studies shared with FriGol on 2 October 2025, the company states (22 October 2025) that: "*FriGol has never purchased from Fazenda Paraíso da Central. All other mentioned properties — Estelina, Bom Jesus, and Chácara Santa Helena — are direct suppliers to FriGol and have no known socio-environmental issues, in accordance with the criteria of the Beef on Track Protocol*." AidEnvironment believes that Frigol's response deflects responsibility by focusing narrowly on direct purchases, ignoring the well-documented indirect cattle transfers potentially linking it to deforestation at Fazenda Paraíso da Central—precisely the kind of indirect sourcing loophole the Beef on Track Protocol and EUDR aim to close.

Environmental sanctions

Embargoes:	Yes	There is 1 embargo issued by Semas-PA in 2021 due to illegal deforestation of 32,5 hectares at Fazenda Paraíso da Central (1). According to the MapBiomas screenshot on the previous page the embargo is not positioned in the current cleared areas of the farm.
Environmental fines:	Yes	The farm received a fine for the clearing as stated above.

Case description

Fazenda Paraíso da Central in São Félix do Xingu, Pará has cleared 22 ha of open-canopy rainforest since the EUDR cut-off date of 31 December 2020, of which 7.5 ha (34%) can be classified as forest under the definitions used by the EUDR (2). Mapbiomas Alerta does not directly confirm the relatively small clearing in the farm (3). According to the Selo Verde platform, the CAR for Fazenda Paraíso da Central is noncompliant with the criteria of the Amazon cattle supplier monitoring protocol. The platform points out that the property has legal reserve deficit and permanent preservation area deficit and does not have authorization to remove native vegetation (4).

Fazenda Paraíso da Central mainly has indirect supply chain links with FriGol's slaughterhouses in Água Azul Do Norte and São Félix do Xingu in Pará (5). For instance, the farm may have indirectly supplied FriGol's slaughterhouse up till 2025, notably via farm Fazenda Estelina in São Félix do Xingu, Pará. For instance, in May 2025, Fazenda Paraíso da Central indirectly supplied FriGol in São Félix do Xingu-PA and Água Azul do Norte-PA through Fazenda Estelina, with owner Darcy Pereira dos Santos, that in turn supplied both FriGol's slaughterhouses in May and June 2025. Moreover, in December 2022, the farm under investigation supplied 36 bovine animals for fattening to Fazenda Estelina, that in turn supplied 2,333 bovine animals for slaughter in the FriGol abattoir between 2022-2023, therefore after and during the clearing. Moreover, an adjacent farm to Fazenda Paraíso da Central, with similar ownership, Fazenda Bom Jesus, directly supplied 55 bovine animals to FriGol's São Félix do Xingu slaughterhouse. Fazenda Bom Jesus also indirectly supplied FriGol's slaughterhouse in São Félix do Xingu via farm Chacara Santa Helena. The farm supplied 462 bovine animals for fattening to Chacara Santa Helena between January 2020 and April 2022, that in turn supplied more than 10,000 bovine animals to FriGol slaughterhouse's São Félix do Xingu between May 2019 and July 2022. It is common practice in Brazil that adjacent farms with similar ownership exchange cattle to mask deforestation or embargoes in one of the properties and only sell from the "clean" property.

Fazenda Paraíso da Central is mentioned on a list from 2014 of farms that supply meatpacking plants that supply Durlicouros (6). A recent investigation of Earthsight (2025) revealed that FriGol likely indirectly supplied bovine hides to the leather industry in Italy through Brazilian leather producer Durlicouros, that indirectly, through Italian tanneries Conceria Cristina and Faeda, supplied European high-fashion brands such as Coach (see also page 8 of this report) (7). These European operators and downstream brands may have been (indirectly) linked to the noncompliant farm reported in this case. Continued (indirect) sourcing from this farm with deforestation after the EUDR cut-off date may also create future noncompliance issues under both the EUDR legality and deforestation requirements. Also, under Brazilian law this case implies irregularities and noncompliance (4).

(1) Semas Pará, online: http://portaldatransparencia.semas.pa.gov.br/#/visao-publica, viewed in September 2025.
(2) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in August 2025.
(3) Mapbiomas Alerta, online: https://plataforma.alerta.mapbiomas.org, with CAR-number MT-5107776-ADBDD57B282847E59D22D1F69CFD4510, viewed in August 2025.
(4) Selo Verde, online: https://seloverde.info/consultar-car/, viewed in September 2025.
(5) Animal Transit Data from the Agricultural Defense Agency of the State of Pará (Adepará) (undisclosed).
(6) Online: https://ptdocz.com/doc/49855/rela%C3%A7%C3%A3o-de-fazendas-tac, viewed in September 2025.
(7) Earthsight (2025), online: https://www.earthsight.org.uk/news/hidden-price-luxury, viewed in August 2025.

Fazenda Santa Tereza

Location: São Félix do Xingu, Pará
Area property (ha): 4,274

Biome: Amazon (Brazil)
Coordinates property: -6.0231, -52.0875

Cleared Area			
106	hectares	**Period clearance:** 2021 to 2025	**Type of vegetation:** Dense-canopy rainforest, submontane (also known as Submontane Dense Humid Forest)
60,243	tons of CO_2		

February 2021

July 2025

Imagery: Before and after clearing of 106 ha in Fazenda Santa Tereza. The blue lines represent the farm boundaries, the red polygons the cleared areas. Source: AidEnvironment. Imagery ©2025 Planet Labs Inc.

About **65 ha** of native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**

Imagery: Fire marks (dark spots) in the cleared areas, detected on 22 August 2025. Man-made, controlled fires are often used for the preparation of the land after deforestation. Source: Copernicus browser.

Imagery: Screenshot of Mapbiomas deforestation alerts in the farm. Mapbiomas Alerta confirms the clearing in two bottom 'alert polygons', but not in the upper part of the farm. Source: MapBiomas, August 2025.

Fazenda Santa Tereza

Ownership & Business relationship

Owners:	Company responses:
Bento Carlos Liebl CAR: PA-1507300-BC46A5247131444C96D6E901A8AF5084	**FriGol** replied (22 October 2025) in response to a draft version of five beef/leather case studies shared with FriGol on 2 October 2025 that: *"it has never purchased from Fazenda Santa Tereza. All other mentioned properties – Sítio Sol Nascer, Chácara Borges, Fazenda Sabiá do Xingu, and Fazenda Dois Irmãos – are direct suppliers to FriGol and have no known socio-environmental issues, in accordance with the criteria of the Beef on Track Protocol."* AidEnvironment believes that Frigol's response deflects responsibility by focusing narrowly on direct purchases, ignoring the well-documented indirect cattle transfers potentially linking it to deforestation at Fazenda Santa Tereza—precisely the kind of indirect sourcing loophole the Beef on Track Protocol and EUDR aim to close. **JBS stated** (23 October 2025): *"AidEnvironment failed to demonstrate the movement of cattle from the aforementioned farms to JBS facilities. None of them are JBS suppliers."* However, follow-up questions from AidEnvironment revealed that JBS was only referring to its direct purchases from the alert cases, while confirming that the indirect farms mentioned in the cases studies (here: Sítio Sol Nascer and Fazenda Conquista) are direct suppliers of JBS, reportedly "*all in compliance with industry protocols and the company's responsible raw material purchasing policy*". Similar to Frigol, JBS is ignoring the well-documented indirect cattle transfers potentially linking it to deforestation at Fazenda Santa Tereza.

Environmental sanctions

Embargoes:	No, only in farm Fazenda São Bento from a linked family member
Environmental fines:	No

Case description

A total of 106 hectares of native vegetation were cleared by farm Fazenda Santa Tereza in São Félix do Xingu, Pará, since the EUDR cut-off date of 31 December 2020, of which 65 ha (61%) can be classified as forest under the definitions used by the Regulation (1). Mapbiomas Alerta confirms the clearing in parts of the farm (2). Moreover, in 2025, the cleared area was further prepared by controlled, man-made fires (see imagery previous page). The farm does not seem to have a plant suppression authorization; therefore, the clearing can be considered likely illegal under Brazilian law (2). According to the Selo Verde platform, the CAR for Fazenda Santa Tereza is noncompliant with the criteria of the Amazon cattle supplier monitoring protocol. The platform points out that the property has legal reserve deficit and permanent preservation area deficit and does not have authorization to remove native vegetation (3).

The farm, its owner, and linked Liebl family are associated with violations and linkages to an alleged terrorist, and the farm is located immediately adjacent to the territory of the Parakanã people of the Apyterewa Indigenous Territory (4). Reports link rancher Bento Carlos Liebl—owner of the 4,274-ha Santa Tereza farm in São Félix do Xingu— to a cluster of properties bordering the Apyterewa Indigenous Territory, Brazil's most deforested area between 2019-2022 (4,5). Investigations describe deforestation and cattle "laundering," whereby animals from inside the Indigenous Territory are moved to neighboring ranches before entering slaughter chains. An IBAMA embargo for deforestation and use of fire was issued against a related family property (Fazenda São Bento). Liebl also appears in police records as an emergency contact for George Washington de Oliveira Sousa, an alleged extremist arrested over the 2022 Brasília bomb plot (5).

According to cattle transportation data (6), there are indirect supply chain links between the cleared farm and FriGol. Between December 2023 and January 2024, Fazenda Santa Tereza indirectly supplied FriGol in Água Azul do Norte-PA and São Félix do Xingu-PA through Sítio Sol Nascer and Chacará Borges, both in São Félix do Xingu-PA. In March 2024 and May 2025, Fazenda Santa Tereza indirectly supplied FriGol in Água Azul do Norte-PA and São Félix do Xingu-PA through Fazenda Sabiá do Xingu and through Fazenda Dois Irmãos, both in São Félix do Xingu-PA. JBS in Tucumã was also indirectly supplied by Fazenda Santa Tereza: through Sítio Sol Nascer in December 2023 and through Fazenda Conquista in November 2024.

A recent investigation of Earthsight (2025) revealed that FriGol likely indirectly supplied bovine hides to the leather industry in Italy through Brazilian leather producer Durlicouros, that indirectly, through Italian tanneries Conceria Cristina and Faeda, supplied European high-fashion brands such as Coach (see also page 8 of this report) (7). These European operators and downstream brands may have been (indirectly) linked to the noncompliant farm reported in this case. Continued (indirect) sourcing from this farm with deforestation after the EUDR cut-off date may also create future noncompliance issues under the Regulation. Also, under Brazilian law this case implies irregularities and noncompliance (3).

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in August 2025
(2) Mapbiomas Alerta, online: https://plataforma.alerta.mapbiomas.org, with CAR-number PA-1507300-BC46A5247131444C96D6E901A8AF5084, viewed in August 2025.
(3) Selo Verde, online: https://seloverde.info/consultar-car/, viewed in September 2025.
(4) Agribusiness Watch, online; https://deolhonosruralistas.com.br/wp-content/uploads/2023/05/As_Origens_Agrarias_do_Terror_2023.pdf, viewed in September 2025.
(5) https://mpabrasil.org.br/noticias/cpmi-do-8-de-janeiro-questiona-george-washington-sobre-conexoes-agrarias/, viewed in September 2025.
(6) Animal Transit Data from the Agricultural Defense Agency of the State of Pará (Adepará) (undisclosed)
(7) Earthsight (2025), online: https://www.earthsight.org.uk/news/hidden-price-luxury, viewed in August 2025.

Fazenda São Luiz

Location: Ourilândia Do Norte - Pará
Area property (ha): 2,192

Biome: Amazon (Brazil)
Coordinates property: -7.0853, -50.6144

Cleared Area				
720	hectares	**Period clearance:** Sep 2024 - Oct 2024	**Type of vegetation:** Dense-canopy rainforest, submontane (also known as Submontane Dense Humid Forest)
409,200	tons of CO_2		

September 2024

Imagery: Before and after clearing of 720 ha by fire in Fazenda São Luiz. The blue lines represent the farm boundaries, the red polygons the cleared areas, through fire. Source: AidEnvironment. Imagery ©2025 Planet Labs Inc.

About **295 ha** of native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**

October 2024

Imagery: Active fire in the farm on 6 September 2024. Source: Copernicus browser.

Fazenda São Luiz

Ownership & Business relationship

Owner: Luiz Antônio Zapparoli Sacarelli PA-1505437-666CB0431F934A4E875B241D56D949DE	**FriGol response:** In response to a draft version of five beef/leather case studies shared with FriGol on 2 October 2025, the company states (22 October 2025) that: *"it has never purchased from Fazenda São Luiz (also known as Fazenda LS in the CAR registry), nor from Luiz Antonio Zapparoli Sacarelli, who is linked to slave labor conditions. Fazenda São Luiz do Pará, on the other hand, has directly supplied animals for slaughter to FriGol; however, its owner is Luiz Antonio Sacarelli. Fazenda São João, owned by Delmo de Paula Cintra, is a direct supplier to FriGol and has no known socio-environmental issues, in accordance with the criteria of the Beef on Track Protocol."* According to AidEnvironment, Frigol's reply limits accountability to direct purchases, overlooking clear ownership links and cattle transfers between Fazenda São Luiz and Fazenda São Luiz do Pará—connections that indicate laundering of cattle from deforested land.

Environmental sanctions

Embargoes:	No	No current embargo according to MapBiomas. In 2018, all agroforestry and pastoral activities in the farm were embargoed, with the aim of fostering environmental regeneration and enabling the recovery of the degraded area. The embargo was lifted in November 2022.
Environmental fines:	No	

Case description

Fazenda São Luiz, located in Ourilândia Do Norte municipality in Pará, has cleared 720 ha of dense-canopy rainforest since the EUDR cut-off date of 31 December 2020, of which 295 ha (41%) can be classified as forest under the definitions used by the EUDR (1). While alert systems such as DETER (deforestation and fires) and NASA VIIRS (fires) have detected the fires in the farm under investigation, MapBiomas Alerta and Prodes, due to some delay in the confirmation process, do not seem to pick up this native vegetation clearing by fire in the farm and often only detect the already degraded land. This seems to be a major loophole in the national deforestation tracking system in Brazil, and AidEnvironment, based on yearly remote satellite monitoring, perceives this as leading to increased clearing by fire to avoid the national tracking system. The farm does not seem to have a plant suppression authorization; therefore, the clearing can be considered likely illegal under Brazilian law (2). In 2003, the farm was linked to slave labour conditions (3). In that year, 14 workers were rescued by labour inspectors from the Brazilian Ministry of Labour in slave labour conditions. While Zapparoli Sacarelli was not convicted in court, he was charged administratively and appeared on the Dirty List of slave labour between 2004 and 2006.

Fazenda São Luiz repeatedly transferred cattle for fattening to Fazenda São Luiz do Pará, for instance 733 bovine animals in 2018, or 441 animals between 2021-2022. The latter farm is under similar ownership and in the same municipality, with a nearly similar farm name, however, cattle transfer records (4) seem to suggest that it concerns two different farms/farm parcels. Fazenda São Luiz do Pará in turn, directly supplied animals for slaughter to FriGol's Água Azul Do Norte slaughterhouse in Pará, for example 630 animals between 2020-2021. It is common practice in Brazil that adjacent farms with similar ownership exchange cattle to mask deforestation or embargoes in one of the properties and only sell from the "clean" property. Fazenda São Luiz also indirectly supplied cattle to FriGol through farms from different owners, such as Fazenda São João of Delmo de Paula Cintra in Água Azul Do Norte. Other than indirect, Fazenda São Luiz also supplied bovine animals directly to the FriGol slaughterhouse.

A recent investigation of Earthsight (2025) revealed that FriGol likely indirectly supplied bovine hides to the leather industry in Italy through Brazilian leather producer Durlicouros, that indirectly, through Italian tanneries Conceria Cristina and Faeda, supplied European high-fashion brands such as Coach (see also page 8 of this report) (5). These European operators and downstream brands may have been (indirectly) linked to the noncompliant farm reported in this case. Continued (indirect) sourcing from this farm with deforestation after the EUDR cut-off date may also create future noncompliance issues under the Regulation. Also, under Brazilian law this case implies irregularities and noncompliance (2).

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in August 2025.
(2) Mapbiomas Alerta, online: https://plataforma.alerta.mapbiomas.org, with CAR-number PA-1505437-666CB0431F934A4E875B241D56D949DE, viewed in September 2025.
(3) Repórter Brasil, 12 March 2003, Em busca da liberdade no Sul do Pará, online: https://reporterbrasil.org.br/2003/12/em-busca-da-liberdade-no-sul-do-para/, viewed in September 2025. Further evidence and photos available upon request.
(4) Animal Transit Data (GTA data) Mato Grosso (undisclosed).
(5) Earthsight (2025), online: https://www.earthsight.org.uk/news/hidden-price-luxury, viewed in August 2025.

Fazenda Santa Fé

Location: São Félix do Xingu, Pará
Area property (ha): 287

Biome: Amazon (Brazil)
Coordinates property: -6.6532, -52.1387

Cleared Area			
133	hectares	**Period clearance:** August - September 2024	**Type of vegetation:** Dense-canopy rainforest, submontane (also known as Submontane Dense Humid Forest
75,588	tons of CO_2		

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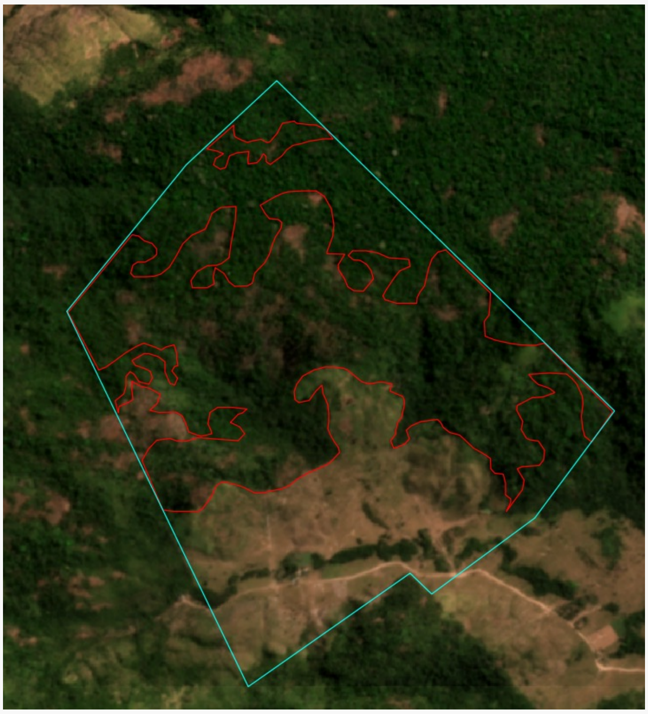
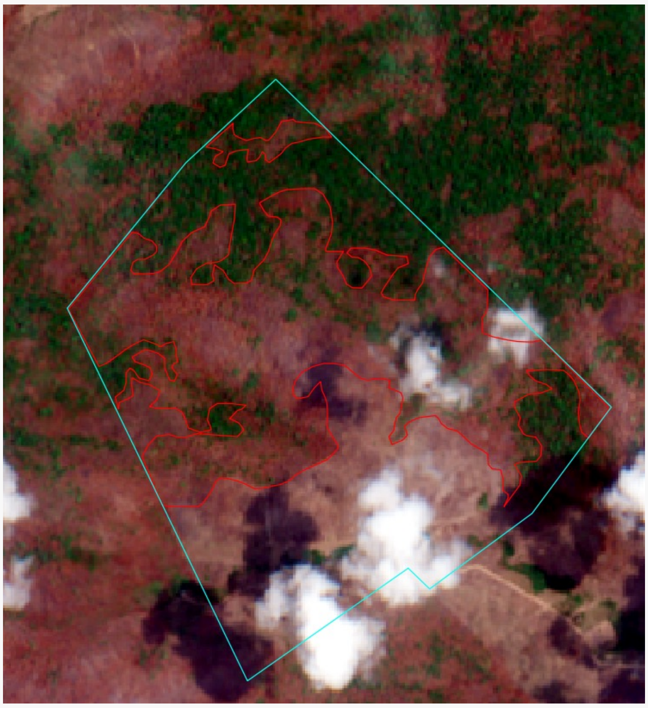


Imagery: Fazenda Santa Fé cleared an area of 133 hectares by fire between August 2024 and September 2024. Source: AidEnvironment. Imagery ©2025 Planet Labs Inc; Copernicus browser.

About **88 ha** of native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**

Imagery: Active fire in the farm on 14 September 2024. Source: Copernicus browser.

September 2024, Source: Copernicus browser



Fazenda Santa Fé

Ownership & Business relationship

Owner: Alexandre Dias Olivo PA-1507300-51620307993A40908A1DBD5269023F45	In response to a draft version of five beef/leather case studies shared with FriGol and JBS on 2 October 2025, **Frigol states** (22 October 2025): *"it has never purchased from Fazenda Santa Fé. All other mentioned properties — Chácara Nossa Senhora da Guia, Fazenda Fernanda, Fazenda Aliança, Fazenda Igarapé Vermelho, and Sítio Murubeca — are direct suppliers to FriGol and have no known socio-environmental issues, in accordance with the criteria of the Beef on Track Protocol."* AidEnvironment believes that Frigol's response deflects responsibility by focusing narrowly on direct purchases, ignoring the well-documented indirect cattle transfers potentially linking it to deforestation at Fazenda Santa Fé —precisely the kind of indirect sourcing loophole the Beef on Track Protocol and EUDR aim to close. **JBS response:** JBS stated (23 October 2025): *"AidEnvironment failed to demonstrate the movement of cattle from the aforementioned farms to JBS facilities. None of them are JBS suppliers."* However, follow-up questions from AidEnvironment revealed that JBS was only referring to its direct purchases from the alert cases, while confirming that the indirect farms mentioned in the cases studies (here: Fazenda Igarapé Vermelho) are direct suppliers of JBS, reportedly *"all in compliance with industry protocols and the company's responsible raw material purchasing policy"*. Similar to Frigol, JBS is ignoring the well-documented indirect cattle transfers potentially linking it to deforestation at Fazenda Santa Fé.

Environmental sanctions

Embargoes:	No
Environmental fines:	No

Case description

Fazenda Sante Fé, located in São Félix do Xingu (Pará) municipality, has cleared 133 ha of native vegetation classified as "dense-canopy rainforest" since the EUDR cut-off date of 31 December 2020. Under the forest definition used by the EUDR, 88 ha (66%) of this can be classified as forest (1). The clearing occurred by fires razing the farm in September 2024. While alert systems such as DETER (deforestation and fires) and NASA VIIRS (fires) detected the fires in the farm under investigation, MapBiomas Alerta and PRODES, due to some delay in the confirmation process, do not seem to pick up this native vegetation clearing by fire in the farm and often only detect the already degraded land. This seems to be a major loophole in the national deforestation tracking system in Brazil, and AidEnvironment, based on yearly remote satellite monitoring, perceives this as leading to increased clearing by fire to avoid the national tracking system. The farm does not seem to have a plant suppression authorization; therefore, the clearing can be considered likely illegal under Brazilian law (2). According to the Selo Verde platform, the CAR for Fazenda Santa Fé is noncompliant with the criteria of the Amazon cattle supplier monitoring protocol. The platform points out that the property has legal reserve deficit and permanent preservation area deficit and confirms the lack of authorization to remove native vegetation (3). The Selo Verde platform also points out that the property's CAR had been modified. The change resulted in a 20% reduction in the area overlapping with PRODES deforestation polygons. The strategy of altering environmental registrations has been studied in an analysis by the Center for Climate Crime Analysis (CCCA), which identified how landowners make changes to the perimeters of their farms to "erase," at least on paper, environmental irregularities on their farm (4).

Fazenda Santa Fé is a direct supplier to various major meatpackers, including JBS - Tucumã slaughterhouse in Pará, Marfrig Global Foods - Tucumã slaughterhouse, and FriGol's slaughterhouse in São Félix do Xingu (Pará) (5). For instance, between October 2018 and June 2021, Fazenda Santa Fé supplied 175 bovine animals for slaughter to the FriGol abattoir, contrary to statements from Frigol that it never sourced from Santa Fé (see above). Indirectly, the farm also supplies FriGol, via various in-between farms. For instance, in June 2023, Fazenda Santa Fé supplied 41 animals for fattening to Chacara Nossa Senhora Da Guia in São Félix Do Xingu, that in turn supplied 516 bovine animals to FriGol's slaughterhouse between 2018-2023. Or indirectly via Fazenda Fernanda in São Félix Do Xingu, that supplied 1,065 animals for slaughter to FriGol between 2018-2022, while it received 108 animals for fattening from Fazenda Santa Fé in 2022. Moreover, a linked property, Fazenda Aliança (similar ownership) in São Félix do Xingu-PA, directly supplied FriGol in Água Azul do Norte-PA, according to animal transit guides (GTAs) registered by Alexandre Olivo on May 12, 2025 (6). Two GTAs, registered on the same day, May 12, and on May 7, indicate the transfer of animals from the Fazenda Santa Fé to this Fazenda Aliança. In February 2025, Fazenda Santa Fé also indirectly supplied FriGol in São Félix do Xingu and Água Azul do Norte-PA through Fazenda Igarapé Vermelho. From February to June 2025, Fazenda Igarapé Vermelho directly supplied JBS in Marabá, Redenção, Santana do Araguaia and Tucumã-PA. In 2024, between February, March and April, Fazenda Santa Fé indirectly supplied the same units of FriGol through Sítio Murubeca and Chácara Nossa Senhora da Guia, both in São Félix do Xingu-PA.

A recent investigation of Earthsight (2025) revealed that FriGol likely indirectly supplied bovine hides to the leather industry in Italy through Brazilian leather producer Durlicouros, that indirectly, through Italian tanneries Conceria Cristina and Faeda, supplied European high-fashion brands such as Coach (see also page 8 of this report) (5). These European operators and downstream brands may have been (indirectly) linked to the noncompliant farm reported in this case. Continued (indirect) sourcing from this farm with deforestation after the EUDR cut-off date may also create future deforestation and legality noncompliance issues under the Regulation. Also, under Brazilian law this case implies irregularities and noncompliance (3).

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in August 2025.
(2) Mapbiomas Alerta, online: https://plataforma.alerta.mapbiomas.org, with CAR-number PA-1507300-51620307993A40908A1DBD5269023F45, viewed in September 2025.
(3) Selo Verde, online: https://seloverde.info/consultar-car/, viewed in September 2025.
(4) CCCA, online: https://climatecrimeanalysis.org/analysisofcarmodifications/, viewed in September 2025.
(5) Animal Transit Data (GTA data) Mato Grosso (undisclosed).
(6) Animal Transit Data from the Agricultural Defense Agency of the State of Pará (Adepará) (undisclosed).
(7) Earthsight (2025), online: https://www.earthsight.org.uk/news/hidden-price-luxury, viewed in August 2025.
(8) Brazilian beef exports (HS 0202 and 0201) to the EU27 between 1 January 2021 and 30 November 2023, filtered for shipper FriGol.

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