

December 2025

Compliance Checker

Company Profile



Six potential non-compliance case studies linked to Mondelēz's cocoa and palm oil operations in Côte d'Ivoire, Cameroon, Brazil, and Indonesia



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Mondelēz International is one of the world's largest chocolate and biscuit manufacturers, sourcing cocoa and palm oil from high-risk tropical forest landscapes. Despite sustainability commitments, such as deforestation-free pledges aligned with the European Union Deforestation Regulation (EUDR) cut-off date (31 December 2020) and widely publicized investments through its [Cocoa Life program](#) and [Palm Oil Action Plan](#), **significant gaps persist between policy ambition, transparency, and verified implementation on the ground.**

The Mondelēz Compliance Checker report has mapped the company's direct and indirect sourcing areas, its links to deforestation hotspots, the location of assets and infrastructure associated with cocoa and palm oil imports into the EU27 market and to relevant supply chain actors. AidEnvironment has identified **six case studies** across **Côte d'Ivoire, Cameroon, Brazil, and Indonesia** where native forest loss (**4,166 ha**) occurred after both the company's and the EUDR's deforestation cut-off dates, in areas potentially linked to Mondelēz through direct and indirect supply chain relationships. Combined with continued reliance on mass-balance systems, limited supplier disclosure since 2021, and discontinued or expired certification statuses in several cooperatives, these findings reveal substantial EUDR compliance risks once the law enters into application. The report's case studies have been shared with Mondelēz International for further engagement in November 2025, but the company did not respond to repeated requests, despite common industry practice of engaging on such submissions.



While Mondelēz has historically developed relatively advanced Corporate Social Responsibility (CSR) frameworks, such as farm mapping, monitoring partnerships, and No Deforestation, No Peat, No Exploitation (NDPE) standards, **their recent calls for delaying EUDR implementation** create reputational and governance concerns and signal declining sustainability ambitions, particularly given the company's central role in the European chocolate market.

Key concerns include:

- Persistent reliance on indirect and untraceable ("mass balance") supply
- Lack of public cocoa supplier sourcing transparency post-2021
- Refusal to participate in global transparency efforts such as the Chocolate Scorecard
- Compliance to the EUDR 2020 cut-off may open the door for backsliding, enabling companies to ignore or override earlier deforestation commitments embedded in initiatives like the 2017 Cocoa & Forests Initiative
- Limited visibility on grievance handling and supplier sanctions
- Evidence of forest loss inside protected or biodiversity-sensitive areas potentially linked to Mondelēz.

Mondelēz has previously demonstrated strong sustainability commitments but now faces **weak implementation** and major traceability, accountability, and implementation gaps that require rapid corrective actions to ensure EUDR-compliant market access, robust human rights due diligence, and truly deforestation-free supply chains.



Recommendations to Mondelēz

Immediate recommendations to Mondelēz (0-6 months):

- ✓ Reinstate and publicly disclose recent and full cocoa supplier lists, including cooperatives and intermediary actors in all cocoa sourcing countries. For palm oil, disclose blocked suppliers and update palm oil mill lists.
- ✓ Publish a clear, time-bound roadmap to transition away from mass-balance sourcing toward segregated or identity-preserved, traceable supply chains.
- ✓ Launch a publicly accessible, regularly updated grievance and non-compliance tracker covering cocoa and palm oil suppliers, including allegations, investigation steps, timelines, outcomes, and sanctions.
- ✓ Prioritize urgent field verification, risk assessment, and risk mitigation for all six case study locations.
- ✓ Strengthen transparency and accountability by actively engaging with the Cocoa Coalition and the Chocolate Scorecard.

Medium-term recommendations to Mondelēz (6-18 months):

- ✓ Introduce mandatory contractual requirements obliging suppliers to provide evidence of deforestation-free, fully traceable supply to plot of production or cooperative level, including measures such as suspension and contract termination in case of continued wrongdoing.
- ✓ Strengthen the Cocoa Life and Palm Oil Action Plan frameworks by (further) integrating independent third-party verification and harmonized monitoring protocols across all commodities and origins, including community-based verification and long-term impact tracking.
- ✓ Support jurisdictional and landscape approaches and invest in forest protection and biodiversity conservation.
- ✓ Publicly disclose annual progress using measurable KPIs (traceability %, verified supply %, hectares monitored, number of remediation cases, etc.).
- ✓ Embed strong accountability mechanisms at the executive level, including sustainability-linked incentives tied to verified deforestation-free sourcing.

Recommendations to Tier-1 Traders

Recommendations to Tier-1 Traders and Suppliers of Mondelēz (Barry Callebaut, Cargill, ECOM, Olam, Bunge, GAR, Wilmar)

- ✓ Disclose full supplier lists, including cooperatives, buying agents, and plantation concessions supplying Mondelēz.
- ✓ Provide and finance farm-level polygon mapping for all suppliers by end-2026.
- ✓ Adopt a shared monitoring system with aligned alerts, cut-off dates, and grievance transparency.
- ✓ Suspend sourcing from identified deforestation cases until remediation is fully verified.
- ✓ Develop alternative livelihood and income models to eliminate incentives for forest clearing.
- ✓ Support the establishment of community-based forest monitoring and reporting committees.
- ✓ Support financially the conservation of forests and national parks.



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Business segments and corporate structure

Mondelēz International, a public company (NASDAQ: MDLZ) headquartered in Chicago, Illinois (USA), was founded in its current form in 2012, originating from the Kraft Foods company. With 2024 net revenues of approximately [\\$36 billion](#), MDLZ is one of the global snacking leaders with worldwide known brands such as Oreo, Ritz, LU, Clif Bar and Tate's Bake Shop biscuits and baked snacks, as well as Cadbury Dairy Milk, Milka, Côte d'Or and Toblerone chocolate.

Mondelēz is among the largest global players in cocoa-based chocolate and confectionery, with about 90,000 employees worldwide. The company sells its products in over [150 countries](#), and has operations in approximately 80 countries, including around 147 principal manufacturing and processing facilities in 46 countries.



The company [reportedly](#) ranks first position in biscuits and second position in chocolate (Figure 1).

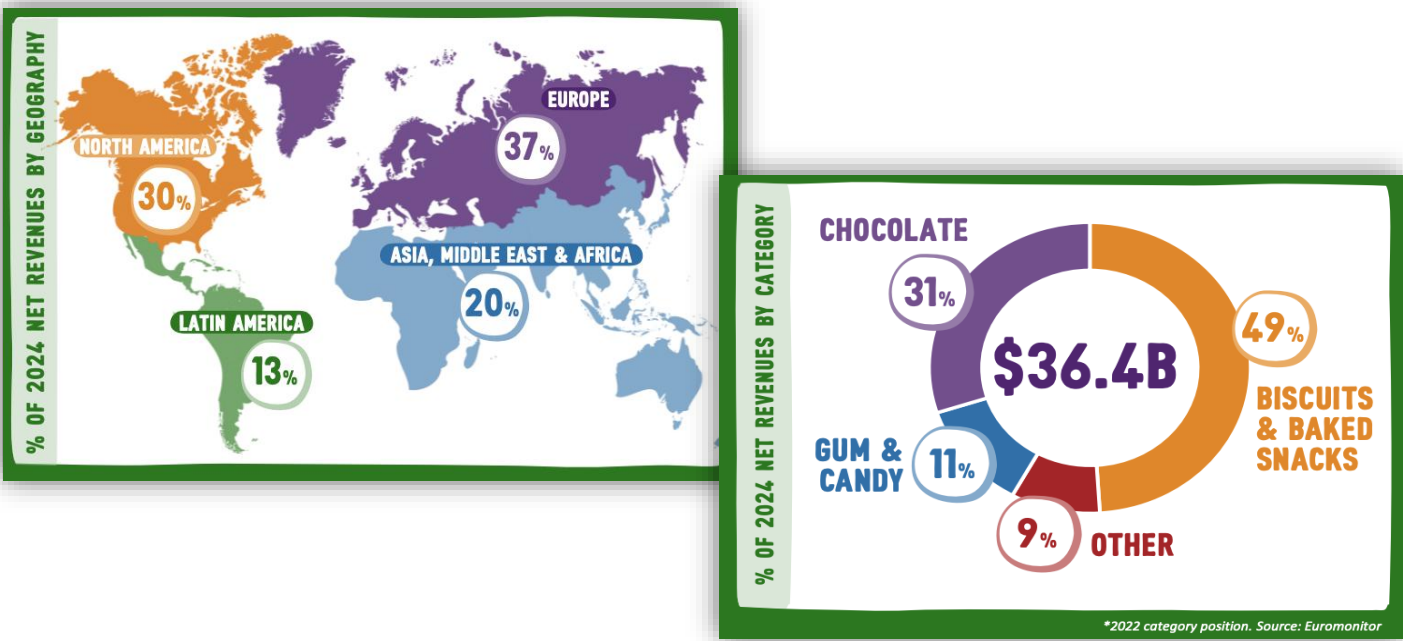


Figure 1. Mondelēz self-declared maps of activities worldwide in 2025.

Source: Mondelēz International factsheet 2025.

Online: https://www.mondelezinternational.com/assets/PDFs/mondelez_intl_fact_sheet.pdf, accessed in September 2025.



Relevant sustainability policies and their gaps



Mondelēz [pledges](#) “no deforestation” across its primary forest-risk commodities (cocoa, palm, soy, paper). The company sets a stepwise target: first to meet the EU’s deforestation-free rules in its European business by end-2025, then to roll this out in other regions, with a cut-off date aligned with the EUDR and SBTi guidance (31 December 2020), for land-use change in scope of “deforestation-free.”



Mondelēz sources cocoa mainly through its **Cocoa Life program**, which [reportedly](#) covered **91% of its chocolate brands in 2024** on a mass balance basis. Through Cocoa Life and the [Cocoa & Forests Initiative](#), the company pledges deforestation-free cocoa with **31 December 2020 as cut-off date**. There are, however, several limitations in Mondelēz’ cocoa commitments and programmes. First, compliance to the EUDR 2020 cut-off may open the door for backsliding, enabling companies to ignore or override earlier deforestation commitments embedded in initiatives like the 2017 Cocoa & Forests Initiative. Moreover, while progress reports highlight cocoa farm mapping (the company [discloses](#) in 2024 to have mapped more than 246,000 cocoa farms) and community projects, Mondelēz is one of the few chocolate brands who has chosen to continue to source **all their cocoa through mass balance systems**. This business model keeps hundreds of thousands of tonnes of cocoa [untraceable](#) and is, by default, non-compliant with EUDR traceability requirements. For instance, a 2025 [investigation](#) by Global Witness revealed that Mondelēz (Cadbury) is exposed to deforestation risk in Liberia through their mass balance purchasing practices. Third, [evidence](#) of child labour has been found on Mondelēz’ Cocoa Life farms, which, combined with “few real commitments” in the Cocoa Life programme, resulted in [IDH’s conclusion](#) that “Cocoa Life therefore appears to be more of a marketing campaign than a real effort to improve farmers’ lives.” This is also illustrated by Mondelēz’s Côte d’Or, the largest Belgian chocolate brand, that was [targeted](#) by a French ethical marketing jury for misguiding sustainability claims.



Mondelēz frames palm oil as a priority commodity under its [Palm Oil Action Plan](#) (POAP), with yearly [updates](#), requiring suppliers to meet **NDPE** (No Deforestation, No Peat, No Exploitation) standards, including traceability to mill level and engaging in satellite monitoring. For palm oil, the company [expects](#) suppliers to continue to adhere to the **cut-off date of December 2015**, as laid out in preceding POAP versions. The company publishes annual **palm oil mill lists** (last one covers mills linked to 2023 volumes, updated in 2025), disclosing more than 1,700 mills attributed to Tier-1 traders such as Bunge, Cargill, and Wilmar. While this level of transparency is significant, Mondelēz does not publish a public **grievance tracker** or **plantation-level sourcing data**, limiting independent oversight. The company [applies](#), through its partner Satelligence, an “indicative sourcing area” of **50 kilometres radius** around the mill location to include all potential sources of supply of Fresh Fruit Bunches (FFB) to that mill. Without concession-level and independent supplier mapping, as well as disclosure of supplier non-compliance actions, NDPE policies remain difficult to verify. Furthermore, reliance on major traders with mixed track records creates exposure to unresolved deforestation and social impacts.



While Mondelēz’s highlights FSC/packaging-type approaches and has concrete and EUDR-aligned timelines as stated above (cut-off date of 31 December 2020) for “deforestation-free” **paper** and **soy**, the company’s current public reporting lacks soy- and fiber-specific traceability data, supplier transparency, and independent performance indicators to verify on-the-ground assurance.



Mondelēz on the EUDR: From early support to calls for delays

Mondelēz initially positioned itself as a **strong supporter** of the EUDR, presenting its own deforestation-free goals as aligned with the regulation's 2020 cut-off date, including a Deforestation-free [Requirement](#) and [Verification Protocol](#) for suppliers under its EUDR Compliance Program. This was consistent with the **company's reputation as an early mover** on mapping and monitoring cocoa farms. However, in mid-2025, Mondelēz shifted course, joining [calls](#) for another twelve-month **delay in the implementation of the regulation**, which has become very [likely](#) in light of the latest developments. An official delay will require reopening the regulation, which may in practice risk watering down its key provisions and scope, as witnessed with the EU Corporate Sustainability Due Diligence Directive (CSDDD). While Mondelēz points to technical and farmer readiness problems, civil society argues that Mondelēz's appeal is misleading and that the company has deliberately chosen to continue sourcing cocoa through - less accountable - mass balance systems. Mondelēz claims this has been a corporate decision and not a matter of capacity. In September 2025, [35 Ivorian NGOs](#) denounced Mondelez over their statement and delay on the EUDR.



Mondelēz's call for an EUDR delay introduces uncertainty into the regulatory process and may slow efforts to prepare farmers for compliance. Its continued use of mass balance in cocoa sourcing limits traceability, meaning significant volumes of cocoa cannot be linked back to farms. This approach may reduce immediate disruption in supply chains but also prolongs structural risks around unverified sourcing. Given Europe's and Mondelēz' central role in global cocoa imports, such a position carries weight: It risks weakening the momentum of the EUDR and delaying broader sectoral progress toward transparent and deforestation-free supply chains.



In other commitments and policies, Mondelēz also seems to embrace a dual approach by showcasing its sustainability commitments but with weak implementation. For instance, while Mondelēz operates several common tools under its NDPE policy, such as a **public palm oil mill list** and a **Grievance Tracking** system, there remains some secrecy around this, making it difficult for watchdog organisations to track publicly. For instance, the company states, on top of its 2025 public mill list for palm oil (updated in January 2025), that *"Some mills listed here may no longer be a part of Mondelez International's supply chain after December 2023 for various reasons, including a determination by MDLZ, that these were not in compliance with its policies and procedures such as MDLZ's Palm Oil Action Plan, Grievance Process and Supplier Code of conduct"*. In response to any noncompliant palm oil mill that research would reveal (e.g. case studies on pages 25 or 27 of this report), the company could reply that despite the mill being disclosed on their public palm oil mill list, they are no longer sourcing from it. Keeping noncompliant palm oil mills in a public palm oil mill list of suppliers, while the company may no longer source from them, may reveal that Mondelēz's due diligence is incomplete and non-transparent, while making it difficult for watchdog organisations to track sustainability progress and compliance publicly.

Moreover, while the company has a ["Compliance Line"](#) for internal affairs, Mondelēz seems to operate only an [internal Grievance Tracker](#). There is absence of a public grievance case log and, therefore, there is no accessible data on the number or types of complaints received or actions taken in response.

Finally, [reportedly](#) Mondelēz refuses to participate in global transparency efforts such as the **Chocolate Scorecard**, warranting them with the lowest scores on the [2025 Cocoa Barometer](#).





Deforestation-risk commodities linked to Mondelēz

The [CDP](#) 2024 Corporate Questionnaire highlights the key agricultural commodities associated with Mondelēz, identifying **cocoa**, **palm oil**, **soy**, and **pulp & paper** as relevant forest-risk commodities, given their inclusion within the scope of the EUDR.

While Mondelēz does not disclose its revenue tied to each of these commodities, **cocoa and palm oil** linked products, in particular, play a significant role in Mondelēz's business, which highlights the importance of addressing deforestation risks associated with cocoa and palm oil production. The products are incorporated in Mondelēz' **chocolate, baked goods, and cereals** business segment. The company is [reportedly](#) a buyer and user of palm oil: *"Despite Mondelez accounting for only around 0.5% of global palm oil purchasing, due to wide and diverse use of palm in a variety of our products, it has a relevant impact on our revenue. We use palm oil as an ingredient [in the form of crude palm kernel oil, palm kernel oil derivatives, palm oil derivatives, and crude palm oil, ed.] in the manufacturing of products across multiple categories, such as chocolate and biscuits."*

Mondelēz does not disclose in detail its **soy and pulp** operations and sourcing origins. Nonetheless, it does report that less than 1% of the company's procurement is spent on **soy products**, mainly sourced as soybean meal and soybean oil. **Pulp and paper** is primarily used for paper-based packaging of the company's products.

The remainder of this report will focus on the company's cocoa and palm oil operations, due to their higher material risk of being linked to deforestation and carbon emissions, combined with the availability of data.

The numbers reported by Mondelēz in the [CDP](#) 2024 disclosures show that:



Mondelēz spent **6-10%** of its procurement on cocoa in 2023. The company does not disclose its total sourced volumes on cocoa.



Mondelēz spent **1-5%** of its procurement on palm oil products in 2023. Reported total sourced volume in 2023: 363,314 MT.



Mondelēz spent **1-5%** of its procurement on pulp and paper products in 2023. Reported total sourced volume in 2023: 697,334 MT.



Mondelēz spent less than **1%** of its procurement on soy products in 2023. Reported total sourced volume in 2023: data on embedded soy unavailable according to Mondelēz.





Mondelēz’ cocoa sourcing from high-risk geographies

Chocolate represented 31% of Mondelēz’s 2024 net revenues by category. Therefore, cocoa is an essential raw material for its business. While Mondelēz does not disclose its total sourced volumes of cocoa, others [report](#) that Mondelēz purchases “approximately 400,000 tonnes of [cocoa] beans annually”. Mondelēz does not seem to own or manage production estates, as all Mondelēz agricultural commodities are purchased. Nevertheless, the company sources cocoa products directly and indirectly from cocoa suppliers all over the world, but primarily from Côte d’Ivoire and Ghana. Over 90% of the global cocoa supply still originates from a narrow belt across these two countries.

Based on information from the Mondelēz’ Cacao Life programme and the [number of farmers mapped](#) by the end of 2024, the following ranking of cocoa sourcing countries for raw products may be indicative for the company: Côte d’Ivoire (87,000 farmers mapped), Ghana (60,500), Indonesia (32,500), Nigeria (8,500), India (6,500) and Brazil (3,500). In Côte d’Ivoire and Ghana, the chocolate industry has for years sourced cocoa linked to the destruction of national parks and protected areas and is now dealing with declining yields and depleted forests. While Cameroon is part of Mondelēz’s Cocoa Life programme, there is a lack of details (e.g. number of farmers mapped) on the country, which is [considered](#) the next cocoa deforestation frontier.

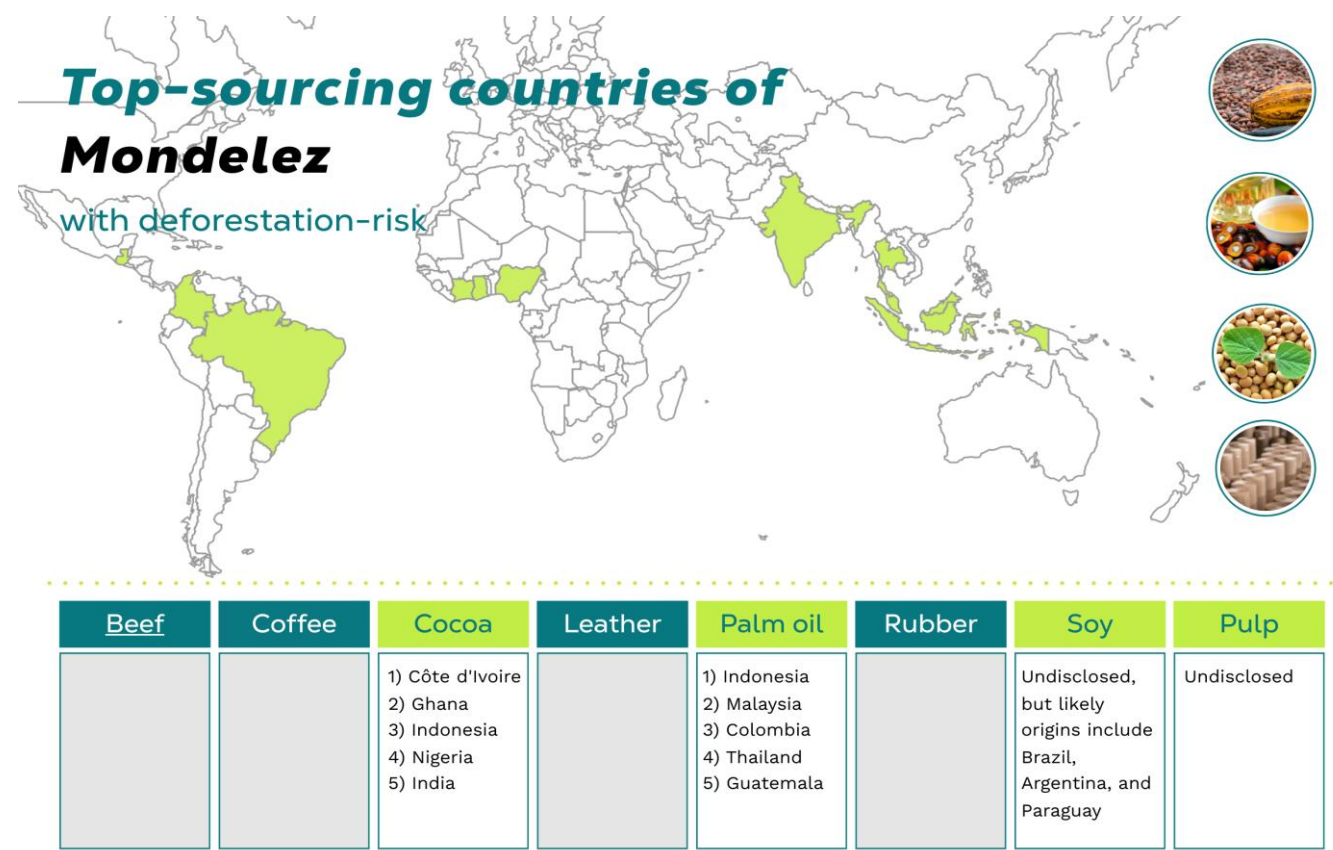


Figure 2. Top-5 sourcing countries with deforestation risk per commodity sourced by Mondelēz. Source: AidEnvironment, based on Mondelēz CDP Corporate Questionnaire 2024; [Mondelēz Cocoa Tier-1 and Tier-2 Supplier List 2021](#); [Mondelēz Palm Oil Mill List 2023](#) (updated in January 2025), and [Cocoa Life numbers of farmers mapped per country 2024](#). There is a lack of disclosed data on Cameroon, but the country might be well part of Mondelēz’ top-5 cocoa sourcing countries.

Mondelēz’ palm oil sourcing from high-risk geographies

Mondelēz’s documents and reporting are not transparent on the priority origins of the company’s sourcing of palm oil products. However, considering that Indonesia and Malaysia are the largest palm oil supplying countries in the world, it is likely that the Mondelēz Group at least sources from these two countries. Historically, palm oil production in Indonesia and Malaysia has resulted in significant deforestation and degradation of forests and peatland and remains a risk.



Mondelēz cocoa suppliers and assets

Mondelēz sources cocoa via key global cocoa producers and traders, with an estimated¹ 50% of their cocoa from **indirect cocoa supply** (beans not sourced through a company's own traceability program), while for the direct supply about **80-90% originates from cocoa trader Barry Callebaut**. The indirect supply remains a **blind spot** where deforestation can occur unchecked. For instance, in 2024, one of Mondelēz's main cocoa suppliers – Cargill – stated that their direct supply chain, and corresponding mapping and sustainability efforts, only accounts for roughly [one third of the cocoa they source](#). This implies that two thirds of Cargill's supply chain is indirect and not traceable within Cargill's Cocoa Promise programme. In 2022, Barry Callebaut [claimed](#) that it reached approximately 60% traceability at individual farm level in direct supply chains, leaving 40% nontraceable as indirect supply.

Côte d'Ivoire is major sourcing area

Mondelēz sources most of its cocoa beans from Côte d'Ivoire. Based on the company's latest publicly shared Cocoa [Tier-1 and Tier-2 Supplier List](#) (in 2021) in Côte d'Ivoire, Mondelēz sources predominantly from **Barry Callebaut** (27 cooperatives), followed by **Olam International** (16 cooperatives), **Cargill** (13 cooperatives), and **ECOM** (8 cooperatives). Figure 3 below maps confirmed Tier-2 Ivorian cooperative suppliers to Mondelēz in 2021 via Tier-1 suppliers Barry Callebaut, Cargill, ECOM, and Olam. Moreover, it also depicts which cooperatives are still Tier-1 suppliers of Barry Callebaut, Cargill, ECOM, and Olam in 2023.

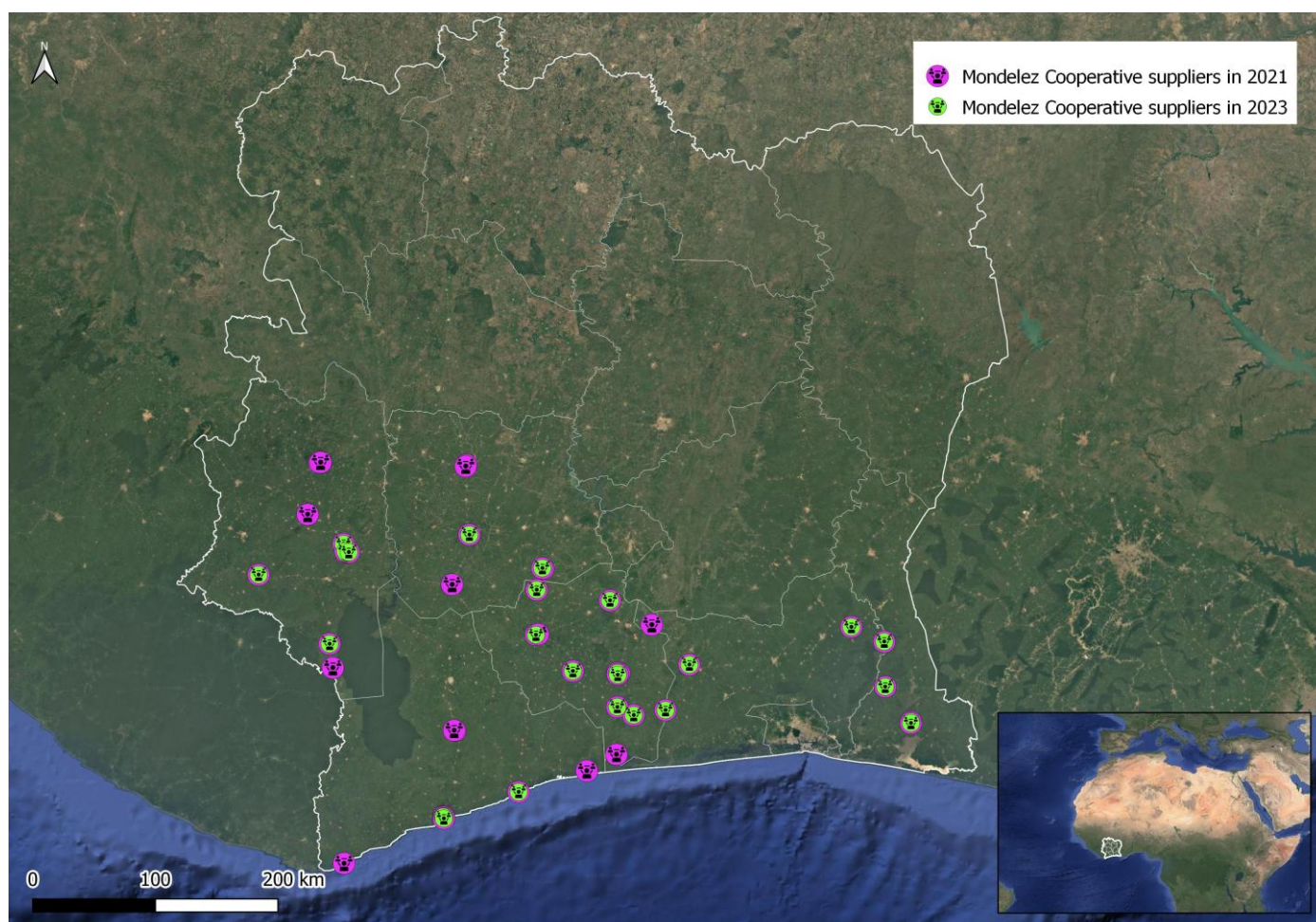


Figure 3. Map of confirmed cooperative suppliers to Mondelēz in 2021 in Côte d'Ivoire (in purple) and from these depicted in green the ones that are still supplying Mondelēz' Tier-1 suppliers Barry Callebaut, Cargill, ECOM, and Olam in 2023. Source: AidEnvironment, based on Mondelēz public Cocoa [Tier-1 and Tier-2 Supplier List](#) (2021) and Trase Earth Côte d'Ivoire [Facilities Map](#) (2019-2023). Note: Since Mondelēz does no longer publicly disclose its cocoa suppliers list since 2021, for trade year 2023 we can only assess the cooperatives (Tier-2) that have continued to supply Tier-1 suppliers of Mondelēz. To have a higher likelihood of still being connected to Mondelēz, AidEnvironment purposely selected cooperatives that ideally supply multiple Tier-1 suppliers of Mondelēz at once, e.g. cooperative SOCOCCI that supplied both Barry Callebaut and ECOM in 2023.

¹ Undisclosed source



Côte d'Ivoire

A three-months sample (31 May 2025 – 31 August 2025) of Ivorian cocoa export data reveals the key position that Tier-1 cocoa suppliers of Mondelēz from Côte d'Ivoire occupy in the global cocoa market (Figures 4 and 5 below). Société Africaine de Cacao (SACO) (in shipment records under the same address -01 BP 1045 Abidjan 01- referred to as the 'African Cocoa Company') is the long-standing **Barry Callebaut** subsidiary that operates the group's main cocoa-processing plant in Abidjan. Nearly all exported produce from company *Ivory Cocoa Products* is bought by **ECOM**, although AidEnvironment could not confirm any shared ownership structure between the companies. **Olam** and **Cargill** are ranked the third and fourth largest global cocoa suppliers and buyers from Côte d'Ivoire. Finally, Guan Chong Berhad, a Malaysian cocoa manufacturer, ranks as the fifth global cocoa buyer from Côte d'Ivoire.

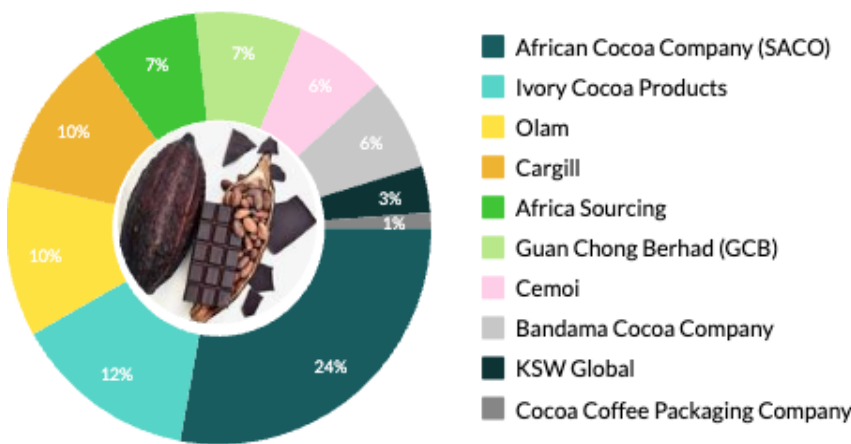


Figure 4. Top-10 global cocoa exporters from Côte d'Ivoire Source: AidEnvironment, based on a representative sample of Ivorian export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025. Goods traded under SACO are part of Barry Callebaut. KSW Global traded goods also include exporters Atlantic Cocoa Corporation (ACC) and Transcao. Together, these 10 companies comprise 86% of the total cocoa export share.

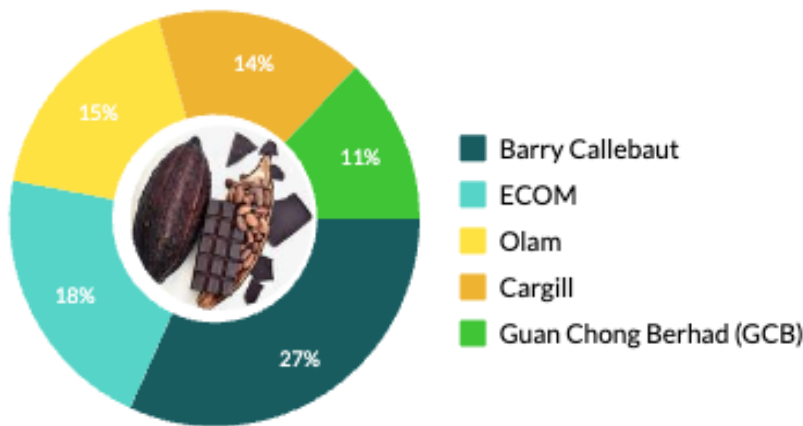


Figure 5. Top-5 global cocoa buyers from Côte d'Ivoire Source: AidEnvironment, based on a representative sample of Ivorian export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025. Goods traded under ECOM are traded under the name of TheoBroma. Together, these five companies comprise 84% of all imported cocoa products globally.

Only considering cocoa produce bought by EU27 countries in the shipment data sample provides a similar picture, with **ECOM, Cargill, Barry Callebaut, Olam, and GCB** ranked as the top-5 buyers (Figure 6 next page), with a combined shared value of **79%** of all imported cocoa products in the EU27. Information on the type of cocoa products reveals that, in the EU27, most cocoa butter imports originate from Côte d'Ivoire, followed by cocoa paste and cocoa shells (Figure 7 on page 12). Figure 8 ranks the major EU27 cocoa importing countries and importing operators from Côte d'Ivoire.



Côte d'Ivoire (cont.)

Top-5 EU27 cocoa buyers from Côte d'Ivoire	Share (%) of all cocoa from Côte d'Ivoire imported in EU27	Share (%) of total imported cocoa products in EU27
ECOM	83%	23%
Cargill	88%	19%
Barry Callebaut	43%	18%
Olam	45%	10%
GCB	54%	9%
Total	-	79%

Figure 6. Top-5 global cocoa buyers from Côte d'Ivoire. Source: AidEnvironment, based on a representative sample of Ivorian export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025, filtered for EU27 countries only.

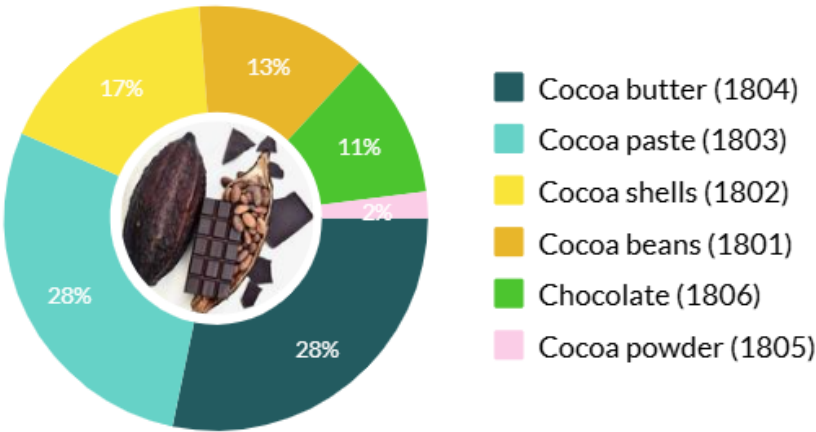


Figure 7. Most imported cocoa products in EU27 from Côte d'Ivoire. Source: AidEnvironment, based on a representative sample of Ivorian export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025, filtered for EU27 countries only.

Top-5 EU importing country	Top-5 EU importing operators
 Netherlands (38%)	ECOM, Cargill, GCB, Olam, Barry Callebaut
 France (24%)	Barry Callebaut, Cemoi, Cargill, Alprose, Comod Trading
 Spain (14%)	Olam, GCB, Monder, Ecom, Nederland
 Germany (13%)	ECOM, Cargill, GCB, Trading & Services, HD Cotterell Hamburg
 Poland (4%)	Barry Callebaut, Alprose, GCB, Africao Trading, ATC Africa Trading

Figure 8. Top-5 EU27 cocoa importing counties from Côte d'Ivoire and top-5 buyers in each country. Source: AidEnvironment, based on a representative sample of Ivorian export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025, filtered for EU27 countries only.



Cameroon

For Cameroon, Mondelēz does not disclose a public cocoa supplier list, including names of linked cooperatives, licensed buying agencies, Common Initiative Groups (GICs), and intermediaries ('coxeurs'). However, AidEnvironment's analysed a sample of recent shipment data between 31 January 2025 and 21 July 2025 which pointed out that major cocoa companies operating in Cameroon include cocoa exporters Atlantic Cocoa Corporation (ACC) as a subsidiary of **KSW Global**, Sic Cacaos as a subsidiary of **Barry Callebaut**, Social Business Enterprise Tech (**SBET**), **Telcar** (former Cargill subsidiary but [split](#) in 2025), Agroproduce Management Services (AMS) as a subsidiary of **ECOM**, **Olam**, **Neo Group**, **Achanyi**, **Wynks Trade**, and **WR Carpenter Trading** (Figure 9). In the sample, the 10 companies listed comprised 83% of the total cocoa export share from Cameroon. Among them, **Barry Callebaut**, **Cargill**, **Olam**, and **ECOM** as known suppliers of Mondelēz, while also companies like [WR Carpenter Trading](#) refer to Tier-1 suppliers of Mondelēz as clients, including Barry Callebaut and Cargill. Six of these major cocoa exporters - Telcar, Olam, Neo Group, Atlantic Cocoa Corporation, Sic-Cacaos, as well as the FODECC (the country's Cocoa and Coffee Subsectors Development Fund) - have [agreed](#) to roll out a platform where they will share plantation locations' data to comply with the EUDR, but it remains unclear how the potential EUDR delay will affect this crucial private initiative.

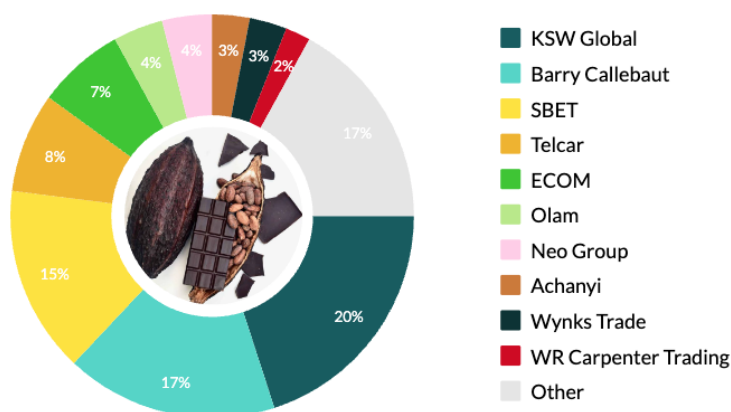
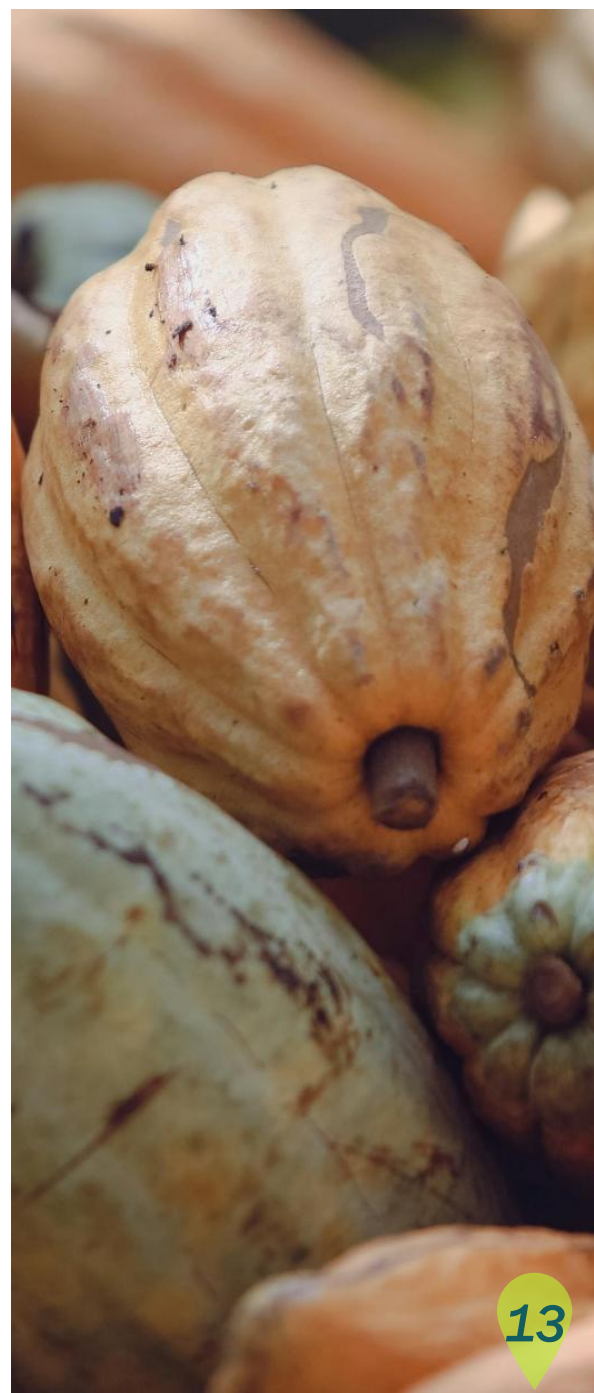


Figure 9. Top-10 global cocoa exporters from Cameroon. Source: AidEnvironment, based on a representative sample of Cameroon export data, including all cocoa-related HS codes (1801 till 1806), between 31 January 2025 and 31 July 2025. Cocoa traded under KSW Global includes exports from Atlantic Cocoa Corporation (ACC); for Barry Callebaut includes exports by Sic-Cacaos; for ECOM includes exports by AMS (Agroproduce Management Services).



The **largest global cocoa buyer** from Cameroon according to the sample is **Cargill**, comprising 18% share of the total value of 1,197 million USD between 31 January and 31 July 2025. Cargill is followed by **Barry Callebaut** (17%), **KSW Global** (15%), **ECOM** (13%), and **Olam** (7%).

According to data from the country's National Cocoa and Coffee Board, the **European Union** is "Cameroon's biggest market where it shipped about [80% of total cocoa bean exports](#), amounting to 185,613 metric tons in the 2023/2024 farming season". Based on cocoa product type in the shipment sample, Cameroon mainly exports cocoa beans (74%) to EU27 countries, followed by cocoa paste (15%) and cocoa butter (10%).





Cameroon (cont.)

Top-5 EU importing country	Top-5 EU importing operators
 Netherlands (55%)	Cargill, ECOM, Olam, TOR (Mauritius), Ascot Amsterdam
 Belgium (11%)	CWT Group, Sucden, Steinweg Group, Barry Callebaut, Agroforce Comm.
 France (11%)	Barry Callebaut, SAS Camayos, Grassfields Trading, Federal Express International, JDC Africa
 Germany (9%)	Barry Callebaut, ECOM, Vollers Group, HD Cotterell, TST Unisped
 Spain (9%)	Sucden, Indcresa, Agroforce Comm., Agri Comm. & Finance, TOR (Mauritius)

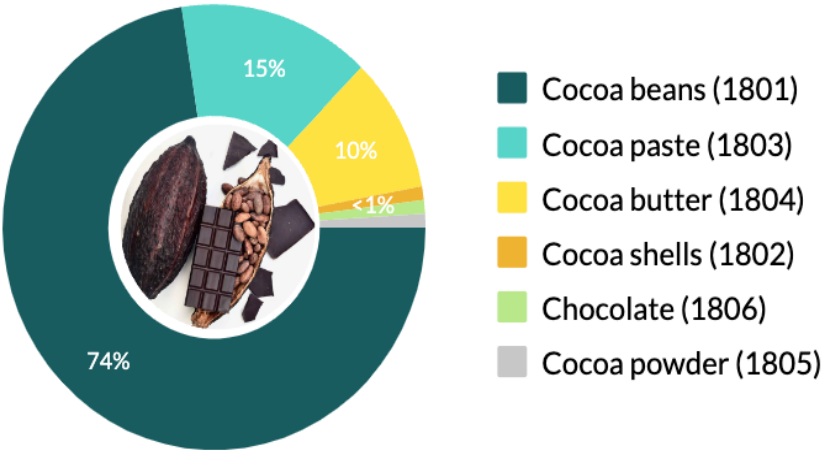


Figure 10. Top-5 EU27 cocoa importing counties from Cameroon including top-5 buyers in each country (left) and most imported cocoa products in the EU27 from Cameroon (right). Source: AidEnvironment, based on a representative sample of Cameroon export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025, filtered for EU27 countries only.

Ghana

In Ghana, the second largest cocoa supplying country to Mondelēz, the company sources cocoa via various key global cocoa producers and traders including **Touton**, **Barry Callebaut Cocoa**, **Taloca** (a former Mondelēz entity), and **Olam International**, as identified from the [Tier-1 and Tier-2 Supplier List](#) (in 2021). AidEnvironment did not do a full shipment data analysis for Ghana.

Indonesia

Recent cocoa export data from Indonesia reveals that mainly **Olam** (under its subsidiary PT Bumitangerang Mesindotama), **GCB** (under subsidiary PT Asia Cocoa Indonesia), **Barry Callebaut**, and **Cargill** directly supply **Mondelēz India Foods** in the form of cocoa butter (HS 1804) and cocoa powder (HS 1805).



Mondelēz palm oil suppliers and assets

Mondelēz does not own or operate any palm oil mills, nor any oil palm concessions. However, they indirectly source palm oil via various palm oil traders. Based on the number of [disclosed](#) and linked palm oil mills, likely its priority global (Tier-1) palm oil suppliers include **Bunge, Cargill, Golden Agri-Resources (GAR), and Wilmar.**

There is a lack of data on the size of Mondelēz palm oil operations per specific sourcing country, although it is evident that Indonesia is the largest palm oil supplying country to Mondelēz. Moreover, based on an analysis of the latest [palm oil mill list](#) of Mondelēz (from 2023, but updated in January 2025), AidEnvironment identified the following top-5 palm oil sourcing countries: **Indonesia, Malaysia, Colombia, Thailand, and Guatemala**, closely followed by Papua New Guinea, Brazil, and Honduras (Figure 11). Figure 12 visualises the locations of oil palm concessions in Indonesia of one of Mondelēz’s main palm oil suppliers in Indonesia: **Cargill.**

Country	No. of mentions in palm oil mill lists of Mondelēz*
Indonesia	1,091
Malaysia	466
Colombia	63
Thailand	20
Guatemala	18
Papua New Guinea	14
Brazil	12
Honduras	12

Figure 11. Mondelēz International top-8 palm oil sourcing countries. Source: latest 2023 [palm oil mill list](#) of Mondelēz (updated in January 2025). *Although this method is not systematic as the numbers of mills does not equal the volumes per country Mondelēz is sourcing from, it does provide a likely priority order of sourcing countries linked to Mondelēz.



Figure 12. Assets (oil palm concessions) of one of Mondelēz main palm oil suppliers in Indonesia: Cargill. Source: AidEnvironment, based on oil palm concession data



Potential non-compliance case studies linked to Mondelēz

This section covers six **case studies** of cocoa and palm oil production plots with likely forest clearing since the EUDR cut-off date that are potentially linked to Mondelēz (summary list in Figure 13 below), that might be noncompliant with the EUDR if any cocoa beans or palm oil produced on the cleared plots would be placed on the EU market when the law becomes applicable. The cases are also not aligned with the 2017 Cocoa & Forests Initiative commitments. The case studies have been shared with Mondelēz for further engagement on 13 November 2025. The report's case studies have been shared with Mondelēz International for further engagement in November 2025, but the company did not respond to repeated requests.

For the preparation of the **cocoa cases**, AidEnvironment has developed 'cocoa-related deforestation risk zones' around Tier-2 cooperative suppliers of Mondelēz, calculated by using deforestation alerts of [Hansen Global Forest Change](#), cooperative locations, satellite imagery from Planet and Sentinel, and the mapped road network, assuming that the average distance a cocoa bean travels are, respectively, 25 km for a small cocoa cooperative (0-800 members), 35 km for a medium cooperative (800-1,000 members) and 45 km for a large cooperative (+1,000 members). When data on cooperative members was unavailable, we used Trase's [estimations](#) of the "[buyers farmer base](#)" for each cocoa cooperative, corresponding basically to the number of farmers supplying a specific company, as disclosed by the company². Moreover, we have used various datasets on cocoa production/[suitability area](#), information on protected areas, a dataset on Cargill-linked cocoa farms, cocoa cooperative [disclosure data](#), field reports (e.g. [Mighty Earth](#) on Cameroon cocoa), and the [JRC Forest Cover 2020](#) to determine standing forest as of the EUDR cut-off date.

For the development of the **palm oil cases**, AidEnvironment has relied on its own database of oil palm concessions and company groups, [Nusaranta Atlas](#), media reports, (geo)RSPO, deforestation alerts (Mapbiomas Indonesia, [Hansen Global Forest Change](#), PRODES), and the Indonesian forest vegetation layer (Kementerian Lingkungan Hidup dan Kehutanan - Ministry of Environment and Forestry).







Mondelēz case	Name property	Owner	Location	Page
 1	Buying zone around cooperative	SOCOCCI - Société Coopérative de Café-Cacao Ivoirien	Gôh, Gagnoa; Gôh-Djiboua (Côte d'Ivoire)	17
 2	Buying zone and Cargill cocoa farms around cooperative	SOCAN - Société Coopérative Agricole Adzopé Nord	La Mé Region, Adzopé; Lagunes (Côte d'Ivoire)	19
 3	Buying zone around cooperative	COOPATHS - Coopérative Agricole Toumtoumda du Haut Sassandra	Haut-Sassandra, Daloa; Sassandra-Marahoué (Côte d'Ivoire)	22
 4	Fazenda San Sebastian /Fazenda Pincesa Sarah	Brasil Biofuels (BBF) (former Biopalma)	Between Ipixuna do Pará and Tomé Açu municipalities in Pará (Brazil)	24
 5	PT Hardaya Inti Plantations (PT HIP)	Central Cipta Murdaya (CCM)	Buol, Sulawesi Tengah (Indonesia)	26
 6	Buying zone around cooperative	ETS Tchouala Cooperative	Nkondjok arrondissement, Littoral district, Nkam department (Cameroon)	28

Figure 13. Six noncompliance cocoa and palm oil cases potentially linked to Mondelēz.

² In reality, a cooperative can have more members, but AidEnvironment has relied on the more conservative number

SOCOCCI (Société Coopérative de Café-Cacao Ivoirien)

Location: Gôh, Gagnoa; Gôh-Djiboua

Biome: Tropical & Subtropical
Moist Broadleaf Forest (Côte d'Ivoire)

Coordinates cooperative: 6.12224; -5.9624

Cleared Area

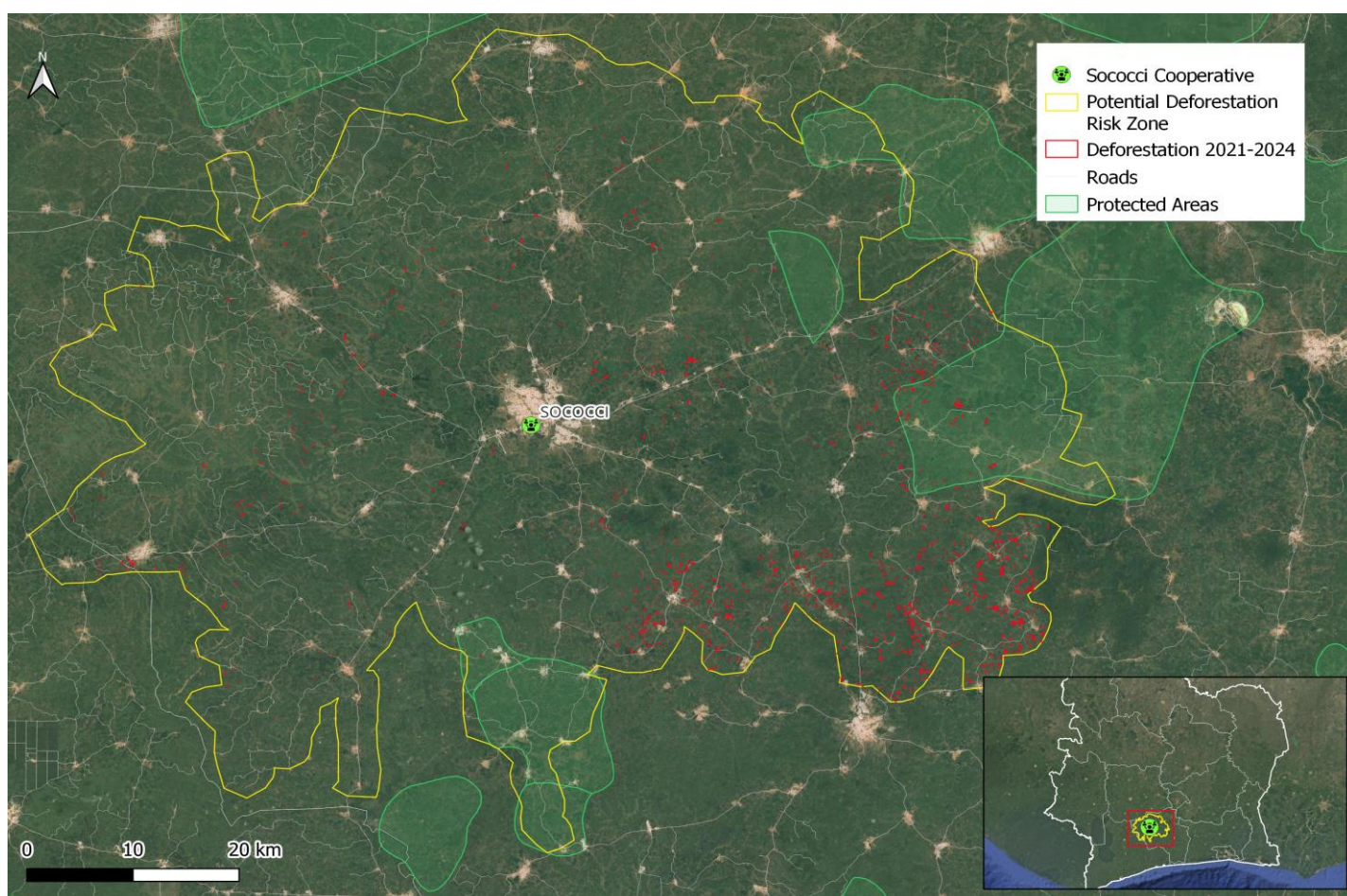
538

hectares

Period clearance:
2021-2024

Type of vegetation:
Eastern Guinean forests

Imagery: Cocoa deforestation risk zone linked to Mondelēz Tier-2 supplying cocoa cooperative SOCOCCI in Gagnoa, Gôh-Djiboua (Côte d'Ivoire)



Source: AidEnvironment, based on publicly available information for Côte d'Ivoire, including deforestation data from January 2021 till December 2024 from [Hansen et al., 2013](#). "High-Resolution Global Maps of 21st-Century Forest Cover Change."; OSM Administrative boundaries and roads; WDPA Protected areas. **Note:** While there is double the size of native vegetation loss in this "deforestation-risk zone", AidEnvironment has only included in the "deforestation 2021-2024" layer the loss of forest in confirmed cocoa production areas which is classified as forest by the FAO.

SCAN COOP-CA
ALLAH-KABO SCOOPS
SOCOCCI SCOOPS
PHENIPRAD
SCOPAF

Ste Coop Agri Nesmon
Ste Coop Simpi Allah Kabo de Duekoue
Ste Coop de cafe-cacao Ivoirien
Ste Coop Phénix de Product Agri Durable
Ste Coop des Prod Agri du Fromager

Screenshot of part of Mondelēz [cocoa supplier list 2021](#), indicating that cocoa cooperative SOCOCCI is an active Tier-2 supplier to Mondelēz, via Tier-1 supplier Barry Callebaut.

SOCOCCI (Société Coopérative de Café-Cacao Ivoirien)

Ownership & Business relationship

SOCOCCI

Mondelēz response:

The company did not respond after repeated requests in November 2025.

Certification status



SOCOCCI's Rainforest Alliance certificate (RALI24-026952) **expired** for the period between 21 Sept 2024 and 20 Sept 2025 (1).

Case description

AidEnvironment detected 1,913 hectares of native vegetation (eastern Guinean forests) clearing between January 2021 and December 2024 in the deforestation-risk buying zone of the cocoa cooperative Société Coopérative de Café-Cacao Ivoirien (**SOCOCCI**), of which **538 ha** (see red polygons in the map of the previous page) intersects with confirmed cocoa production area. This is a conservative estimation of forest loss as SOCOCCI cooperative is located in an exclusively cocoa producing area, with hardly any other crop production. The vegetation cleared is classified as forest under the FAO definition and EUDR definition (2).

While the cooperative was UTZ/Rainforest Alliance certified for several years, its current certification status is “expired”, meaning that *“the validity date of the license has passed, and the license has not been renewed”* (1). Rainforest Alliance however communicated with AidEnvironment (November 2025) that it is *“normal practice in Côte d'Ivoire for cooperative certificates/licenses to expire annually”* and that *“new certificates are issued once cooperatives successfully pass the audit for the upcoming crop season—in this case, the 2025/2026 season”*. SOCOCCI cooperative reported **912 members** (50 women, 862 men) to Rainforest Alliance and an estimated production volume of 1,134,824 KG in 2024-2025, of which 64% (723,420 KG) was sold as certified cocoa (3).

The cooperative is listed as a Tier-2 cocoa supplier of Mondelēz in 2021, via Tier-1 supplier Barry Callebaut (4). Since Mondelēz does no longer publicly disclose its cocoa suppliers list since 2021, for recent trade years, AidEnvironment can only assess the cooperatives (Tier-2) that have continued to supply key Tier-1 suppliers of Mondelēz, including Barry Callebaut, Cargill, ECOM, and Olam. Trase has listed Barry Callebaut as a steady buyer of this cooperative between 2019 – 2023 (4), and therefore likely the trading relationship with Mondelēz also sustained. Moreover, Trase reports that in 2022 and 2023 also ECOM sourced from this cooperative. The combined estimated “buyers farmer base” of Barry Callebaut and ECOM was 2,292 suppliers in 2023 (5).

The clearing occurred after Mondelēz' pledge for deforestation-free cocoa with a 31 December 2020 cut-off date and includes clearance within the boundaries of protected areas (Sangoué and Nizoro). The nearest of these protected areas is located within 20 km of the cooperative.

Mondelēz may not be able to achieve negligible risk in their due diligence efforts under its own company commitments or the EUDR when indirectly buying cocoa beans from SOCOCCI, through cocoa traders such as Barry Callebaut and ECOM.

- (1) Rainforest Alliance List of Certificate Holders, online: <https://www.rainforest-alliance.org/business/certification/certificate-search-and-public-summaries/>, viewed in October 2025.
- (2) EU Forest Observatory, online: <https://forest-observatory.ec.europa.eu/forest>, viewed in October 2025.
- (3) Pers. Comm. Rainforest Alliance, 28 November 2025.
- (4) Mondelēz public Cocoa [Tier-1 and Tier-2 Supplier List](#) (2021), viewed in October 2025.
- (5) Trase facilities map Côte d'Ivoire, online: <https://trase.earth/explore/facilities-data/map?facilityTypeId=cote-d-ivoire-cocoa-cooperatives>, viewed in October 2025.

SOCAAN (Société Coopérative Agricole Adzopé Nord)

Location: La Mé Region, Adzopé; Lagunes

Biome: Tropical & Subtropical Moist Broadleaf Forests (Côte d'Ivoire)

Coordinates cooperative: 6.096; -3.861

Cleared Area

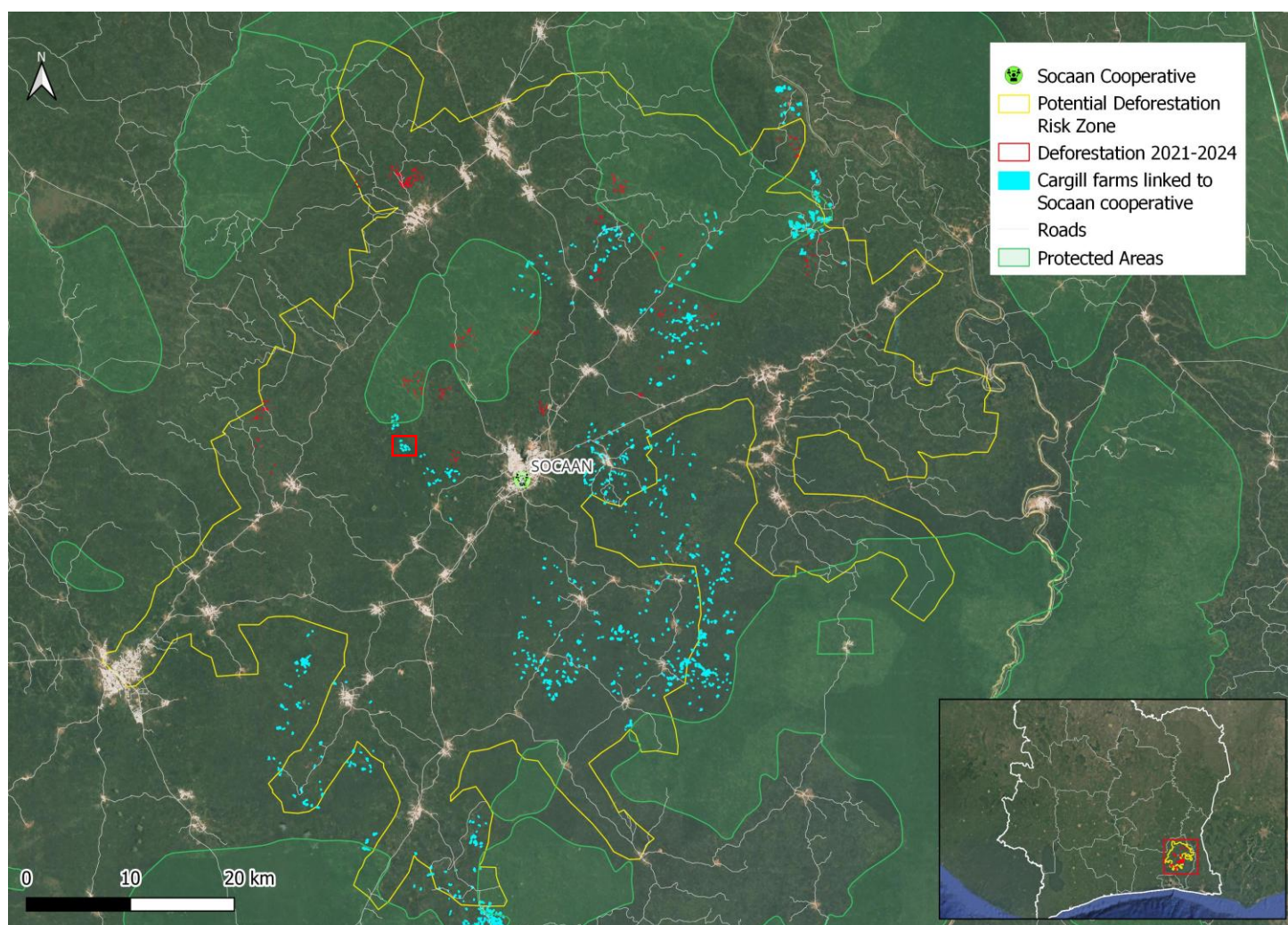
106

hectares

Period clearance:
2021-2024

Type of vegetation:
Eastern Guinean Forests

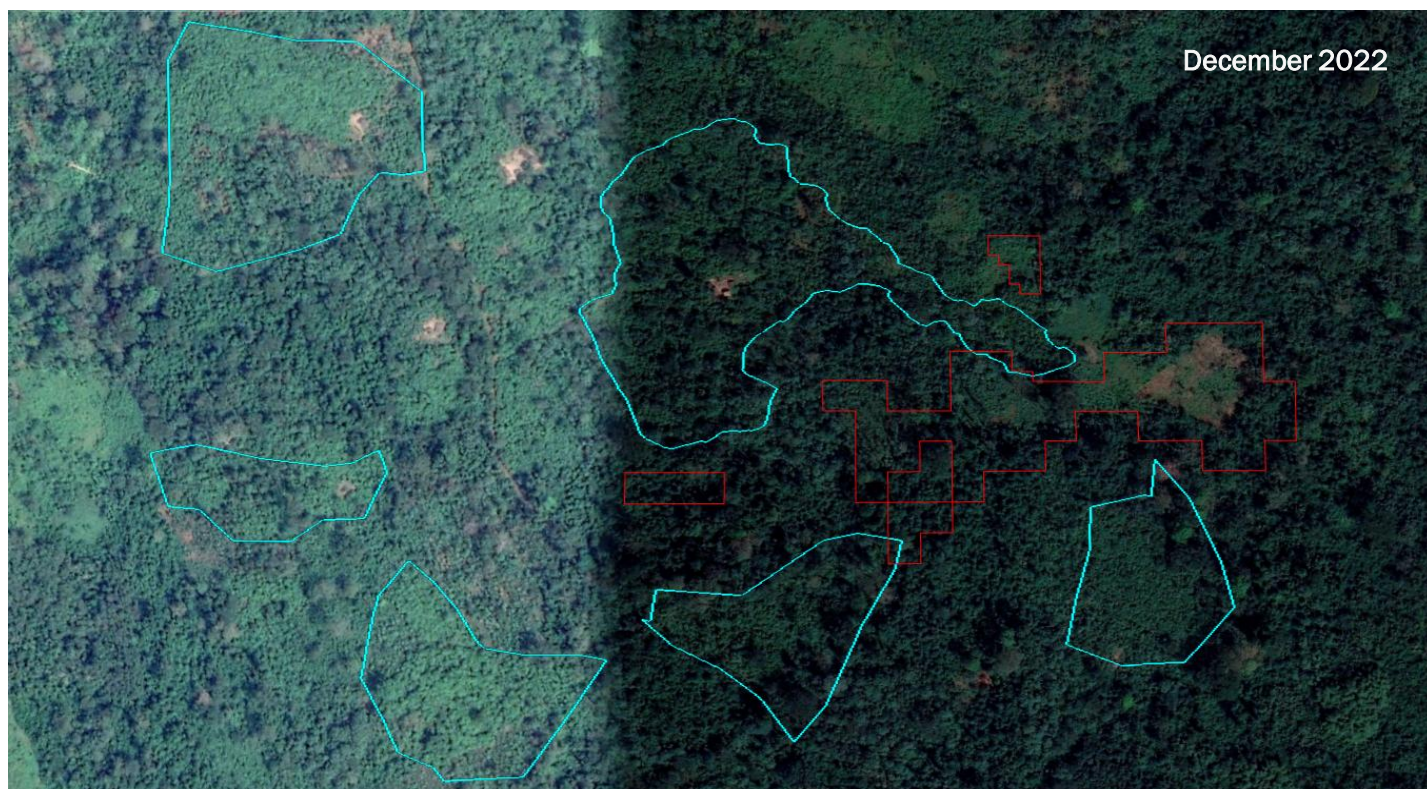
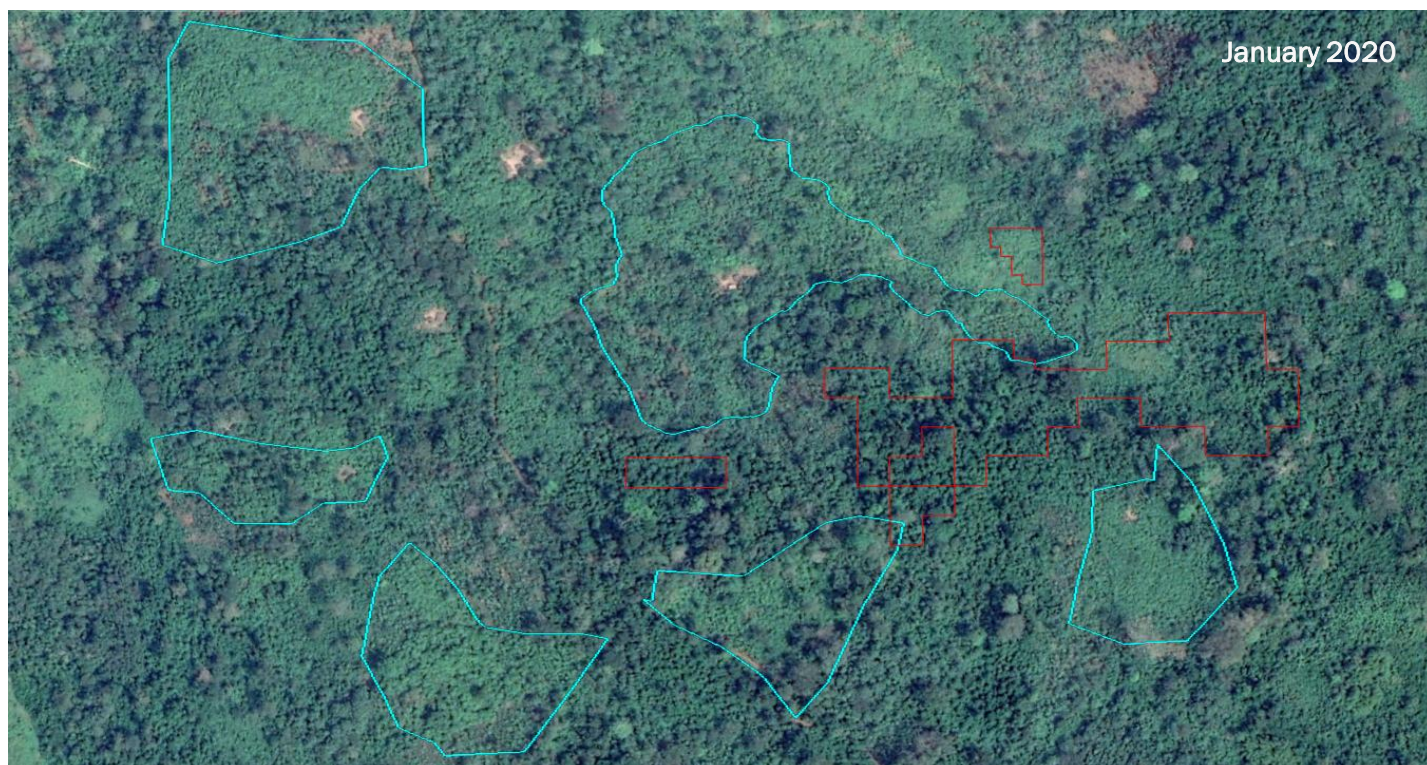
Imagery: Cocoa deforestation risk zone linked to likely Tier-2 Mondelēz supplying cocoa cooperative SOCAAN in La Mé Region, Adzopé; Lagunes district (Côte d'Ivoire)



Source: AidEnvironment, based on publicly available information for Côte d'Ivoire, including deforestation data from January 2021 till December 2024 from [Hansen et al., 2013](#). "High-Resolution Global Maps of 21st-Century Forest Cover Change."; OSM Administrative boundaries and roads; Cargill cocoa farms 2019-2020 (undisclosed source); WDPA Protected areas. **Note:** While there is significant native vegetation loss in this whole "deforestation-risk zone" (a total of **9,194 ha**), AidEnvironment has only included in the "deforestation 2021-2024" layer the loss of forest in confirmed cocoa production areas which is classified as forest by the FAO (**106 ha**). The red box represents the location of a cluster of Cargill supplying farms to SOCAAN cooperative (see next page).

SOCAAN (Société Coopérative Agricole Adzopé Nord)

Imagery: Cargill cocoa farms (blue polygons) with adjacent deforestation (red polygons) inside SOCAAN cocoa deforestation risk zone in La Mé Region, Adzopé; Lagunes (Côte d'Ivoire)



Source: AidEnvironment, based on deforestation data from January 2021 till December 2024 from [Hansen et al., 2013](#). "High-Resolution Global Maps of 21st-Century Forest Cover Change"; Cargill cocoa farms 2019-2020 (undisclosed source). The cleared vegetation in the red polygons (4.02 hectares) is classified as forest by the FAO. Coordinates of the deforestation: 6.12312, -3.96344. See also red box in the previous page imagery for the location of this cluster of Cargill farms within the buying zone.

SOCAAN (Société Coopérative Agricole Adzopé Nord)

Ownership & Business relationship

SOCAAN

Mondelēz response:

The company did not respond after repeated requests in November 2025.

Certification status



SOCAAN Rainforest Alliance certificate (RALI24-028888) is **granted** for the period between 23 October 2024 and 22 October 2025 (1).

Case description

Since Mondelēz does no longer publicly disclose its cocoa suppliers list since 2021 (SOCAAN was not part of that list), for recent trade years AidEnvironment can only assess the cooperatives (Tier-2) that supply key Tier-1 suppliers of Mondelēz, including Cargill and Olam (2). SOCAAN has a long-standing relationship with Cargill and consistently supplied the company between 2012 and 2023 (later years are undisclosed) (3). In 2023, the estimated supplier base from this cooperative to Cargill is 1,441 cocoa farmers. Trase has further listed Olam as a buyer of this cooperative between 2019 and 2021.

SOCAAN was founded in 2008, and self-reports to have 3,000 members farmers, with a projected production of 12,000 tons of cocoa beans by 2025 of which at least 5,000 tons is destined for export (4), mostly through its key client Cargill (5). SOCAAN cooperative reported **1,364 members** (6 women, 1,358 men) to Rainforest Alliance and an estimated production volume of 2,391,691 KG in 2024-2025, of which 77% (1,849,204 KG) was sold as certified cocoa (5). The numbers demonstrate a very limited number of female cocoa producers involved in the cooperative.

While the cooperative is rewarded for sustainable cocoa production and reforestation projects (7), there is significant clearing surrounding the cooperative. AidEnvironment detected **9,194 hectares** (ha) of native vegetation (Eastern Guinean Forests) clearing between January 2021 and December 2024 in the deforestation-risk buying zone of the cocoa cooperative SOCAAN, but only **106 ha** intersects with confirmed cocoa production area and the FAO/EUDR forest definition (8) (see red polygons in the map of the previous page). This is a very conservative estimation of forest loss as SOCAAN cooperative is located in an exclusively cocoa producing area, with hardly any other crop production.

The clearing occurred after Mondelēz' pledge for deforestation-free cocoa with a 31 December 2020 cut-off date and includes clearance within the boundaries of protected areas (Besso and Adzope). The nearest of these protected areas is located within 12 km of the cooperative.

AidEnvironment identified that some of the clearing happened within (or very close to) cocoa farms that are directly linked to Cargill, a total of **11.5 ha** (9). The photos in the previous page reveal the proximity of deforestation in the middle of a cluster of Cargill cocoa supplying farms, making it very likely that the cleared land will be used for cocoa production. Mondelēz, supplied in Europe by cacao traders such as Cargill and Olam, may therefore not be able to achieve negligible risk in its due diligence efforts under its own company commitments or the EUDR when potentially indirectly buying cocoa beans from SOCAAN cooperative.

- (1) Rainforest Alliance List of Certificate Holders, online: <https://www.rainforest-alliance.org/business/certification/certificate-search-and-public-summaries/>, viewed in October 2025.
- (2) Mondelēz public Cocoa [Tier-1 and Tier-2 Supplier List](#) (2021), viewed in October 2025.
- (3) Trase facilities map Côte d'Ivoire, online: <https://trase.earth/explore/facilities-data/map?facilityTypeId=cote-d-ivoire-cocoa-cooperatives>, viewed in October 2025.
- (4) SOCAAN website, online: [Presentation – SOCAAN](#), viewed in October 2025.
- (5) Pers. Comm. Rainforest Alliance, 28 November 2025
- (6) SOCAAN website, online: [Nos partenaires – SOCAAN](#), viewed in October 2025.
- (7) Online: <https://www.aip.ci/151728/cote-divoire-aip-une-societe-cooperative-agricole-dadzope-distinguee-par-le-grand-prix-nelson-mandela>, viewed in October 2025.
- (8) EU Forest Observatory, online: <https://forest-observatory.ec.europa.eu/forest>, viewed in October 2025.
- (9) Undisclosed source on Cargill cocoa farms connected to cooperative SOCAAN (2019-2020).

COOPATHS / COOP.A.T. HS (Coopérative Agricole Toumtounda du Hautassandra)

Location: Haut-Sassandra, Daloa; Sassandra-Marahou

Biome: Tropical & Subtropical
Moist Broadleaf Forest (Côte d'Ivoire)

Coordinates cooperative: 6.86980; -6.4515

Cleared Area

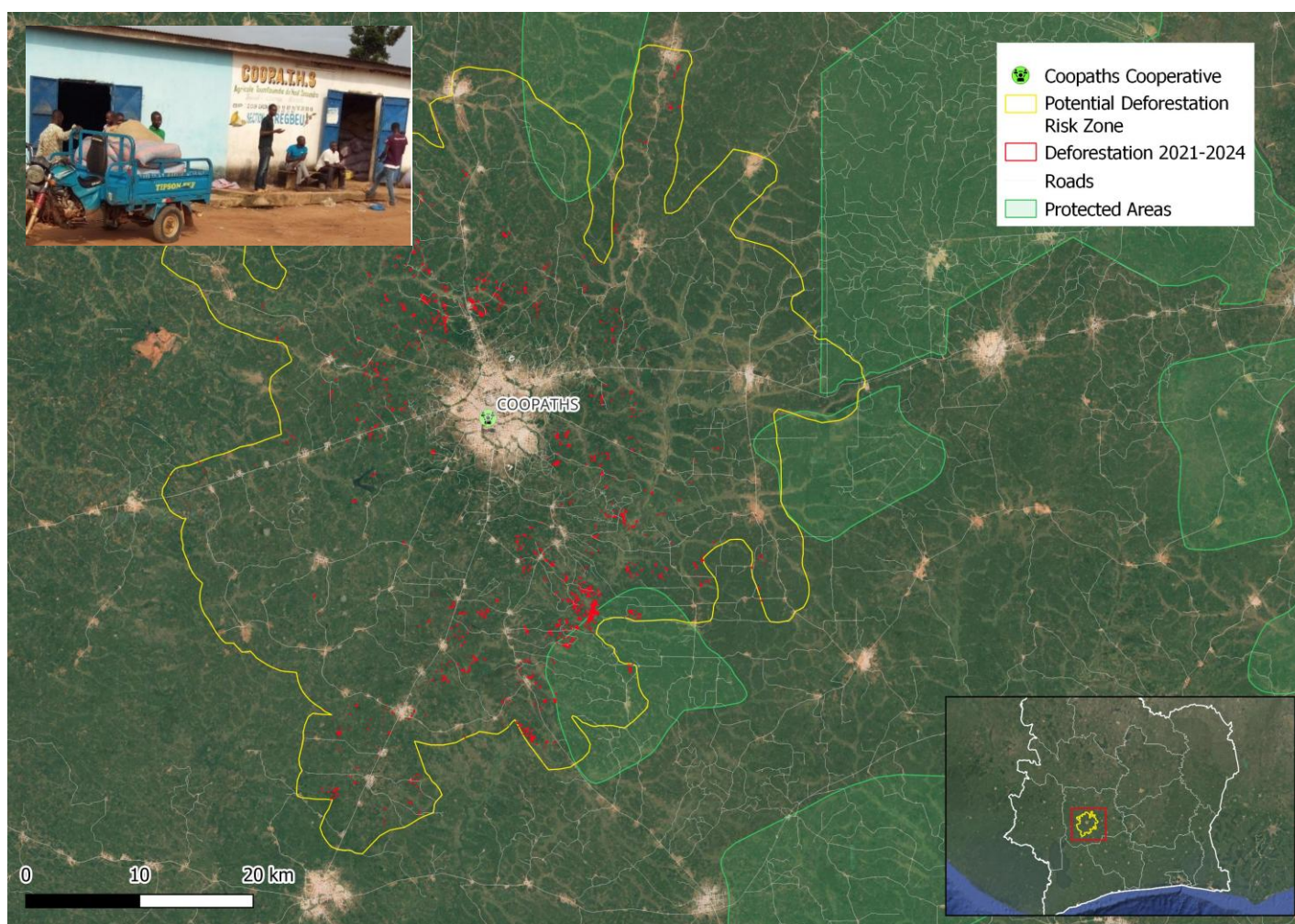
421

hectares

Period clearance:
2021-2024

Type of vegetation:
Eastern Guinean forests

Imagery: Cocoa deforestation risk zone linked to Mondelēz Tier-2 supplying cocoa cooperative COOPATHS in Haut-Sassandra, Daloa; Sassandra-Marahou district (Côte d'Ivoire)



Source: AidEnvironment, based on publicly available information for Côte d'Ivoire, including deforestation data from January 2021 till December 2024 from [Hansen et al., 2013](#). "High-Resolution Global Maps of 21st-Century Forest Cover Change."; OSM Administrative boundaries and roads; WDPA Protected areas. **Note:** While there is double the size of native vegetation loss in this "deforestation-risk zone", AidEnvironment has only included in the "deforestation 2021-2024" layer the loss of forest in confirmed cocoa production areas which is classified as forest by the FAO. [Photo](#) (2018) of cocoa unloading at COOPATHS cooperative.

SCAEB

Coopanou

COOPATHS - SCOOPS

COVIMEA

Société Coopérative Agricole Espoir de Bolequin

Société Coopérative Agricole de Nougbatchi

Coopérative Agricole Toumtounda du Haut Sassandra

Coopérative Victoire de Meagui

Screenshot of part of Mondelēz [cocoa supplier list 2021](#), indicating that cocoa cooperative COOPATHS is an active Tier-2 supplier to Mondelēz, via Tier-1 supplier ECOM.

COOPATHS / COOP.A.T. HS (Coopérative Agricole Toumtounda du Haut Sassandra)

Ownership & Business relationship

COOPATHS **Mondelēz response:**

The company did not respond after repeated requests in November 2025.

Certification status



COOPATHS Rainforest Alliance certificate (RALI24-027963) **expired** for the period between 29 Sept 2024 and 28 Sept 2025 (1). The cooperative seems to have a **valid** Fairtrade USA certification between 21 November 2023 to 20 May 2027 (2).

Case description

AidEnvironment detected 1,995 hectares (ha) of native vegetation (Tropical & Subtropical Moist Broadleaf Forest) clearing between January 2021 and December 2024 in the deforestation-risk buying zone of the cocoa cooperative Coopérative Agricole Toumtounda du Haut Sassandra (COOPATHS, also referred to as COOP. A.T. HS), of which **421 ha** intersects with confirmed cocoa producing area. This is a conservative estimation of forest loss as COOPATHS cooperative is in an exclusively cocoa producing area, with hardly any other crop production. The vegetation cleared is classified as forest under the FAO definition and EUDR definition (3).

The cooperative has a valid Fair Trade USA certification between November 2023 and May 2027 (2). Moreover, while the cooperative seems to have been previously UTZ/Rainforest Alliance certified (for instance between 2023-2024), its current certification status is “expired”, meaning that “the validity date of the license has passed, and the license has not been renewed” (1). Rainforest Alliance however communicated with AidEnvironment (November 2025) that it is “*normal practice in Côte d’Ivoire for cooperative certificates/licenses to expire annually*” and that “*new certificates are issued once cooperatives successfully pass the audit for the upcoming crop season—in this case, the 2025/2026 season*”. COOPATHS cooperative reported **757 members** (45 women, 757 men) to Rainforest Alliance and an estimated production volume of 1,060,692 KG in 2024-2025, of which 92% (977,156 KG) was sold as certified cocoa (4).

The cooperative is listed as a Tier-2 supplier of Mondelēz in 2021, via Tier-1 supplier ECOM (5). Since Mondelēz does no longer publicly disclose its cocoa suppliers list since 2021, for recent trade years we can only assess the cooperatives (Tier-2) that have continued to supply key Tier-1 suppliers of Mondelēz, including Barry Callebaut, Cargill, ECOM, and Olam. Trase has listed ECOM as a buyer of COOPATHS between 2019 – 2021, and Cargill since 2022 (6). The estimated “buyers farmer base” of Cargill from COOPATHS was 638 suppliers in 2023 (*Ibid*).

The clearing occurred after Mondelēz’ pledge for deforestation-free cocoa with a 31 December 2020 cut-off date and includes clearance within the boundaries of protected areas (Vavoua and Zagoreta). The nearest of these protected areas is located within 19 km of the cooperative.

Mondelēz may not be able to achieve negligible risk in their due diligence efforts under its own company commitments or the EUDR when indirectly buying cocoa beans from COOPATHS, through cocoa traders such as ECOM and Cargill.

- (1) Rainforest Alliance List of Certificate Holders, online: <https://www.rainforest-alliance.org/business/certification/certificate-search-and-public-summaries/>, viewed in October 2025.
- (2) SCS Global Services, online: <https://www.scsglobalservices.com/certified-clients/certificates/current/11440612;https://cdn.scsglobalservices.com/certificates/12/1B1629D0-05B3-2F43-8A93-D834C6F706A1.pdf>, viewed in October 2025.
- (3) EU Forest Observatory, online: <https://forest-observatory.ec.europa.eu/forest>, viewed in October 2025.
- (4) Pers. Comm. Rainforest Alliance, 28 November 2025.
- (5) Mondelēz public Cocoa [Tier-1 and Tier-2 Supplier List](#) (2021), viewed in October 2025.
- (6) Trase facilities map Côte d'Ivoire, online: <https://trase.earth/explore/facilities-data/map?facilityTypeId=cote-d-ivoire-cocoa-cooperatives>, viewed in October 2025.

Fazenda Sebastian/Fazenda Princesa Sarah

Location: between IPIXUNA DO PARÁ and TOMÉ AÇU municipalities in PARÁ

Biome: Amazon (Brazil)

Area property (ha): 2,903

Coordinates: -2.64503, -48.02603

Cleared Area

1,192 hectares
676,011 tons of CO₂

Period clearance:
September 2023 and
March 2024

Type of vegetation:
Lowland Ombrophilous
Dense Forest



Dados do Imóvel no CAR
Nome do imóvel: FAZENDA SAN SEBASTIAN
Número do recibo: PA-150001-664740B9F214...
Área: 1.484,70 ha
Status: SUSPENSO
[GERAR BASE DE REFERÊNCIA](#)
[FICHA DO IMÓVEL](#)

→ JUAREZ MATHIAS DE CASTRO

Dados do Imóvel no CAR
Nome do imóvel: FAZENDA PRINCESA SARAH
Número do recibo: PA-1503457-C61D48622034...
Área: 2.903,23 ha
Status: CANCELADO
[GERAR BASE DE REFERÊNCIA](#)
[FICHA DO IMÓVEL](#)

→ BRASIL BIO FUELS REFORESTAMENTO
INDUSTRIA E COMERCIO S/A

Dados do Imóvel no CAR
Nome do imóvel: FAZENDA PRINCESA SARAH
Número do recibo: PA-1503457-AB1248D9CC904...
Área: 2.903,23 ha
Status: SUSPENSO
[GERAR BASE DE REFERÊNCIA](#)
[FICHA DO IMÓVEL](#)

→ VALE S/A

Dados do Imóvel no CAR
Nome do imóvel: Fazenda Conquista
Número do recibo: PA-1508001-F547C011D0974...
Área: 3.600,89 ha
Status: ATIVO
[GERAR BASE DE REFERÊNCIA](#)
[FICHA DO IMÓVEL](#)

→ ANTONIO JOSE MAGALHAES ALMEIDA

Imagery: Overlapping Brazil Rural Environmental Registry (CAR) registrations. Source: [CAR SEMAS Pará](#)

Imagery: Before (above) and after (below) clearing images of Fazenda San Sebastian/Fazenda Princesa Sarah between September 2023 and March 2024 Source: AidEnvironment, Imagery © 2025 Planet Labs PBC.

Fazenda Sebastian/Fazenda Princesa Sarah

Ownership & Business relationship

Owner:

Brasil Biofuels (BBF)
(former Biopalma)

Mondelēz response:

The company did not respond after repeated requests in November 2025.

Environmental fines, embargoes, and suspensions

Embargoes and environmental fines:

There is incomplete information on ownership linked to this farm in the SIGEF cadaster information system to assess embargoes and fines.

Case description

AidEnvironment detected 1,192 hectares of clearing of native vegetation in this farm that is registered under the name of Fazenda San Sebastian in Brazil's SIGEF system, and Fazenda Princesa Sarah in the Rural Environmental Registry (CAR). Brasil Biofuels (BBF) and Vale are among the self-declared owners of this latter property in the CAR (see also previous page), although their CARs are cancelled (1). Chain Reaction Research (CRR) in 2021 revealed that buyers of Brasil BioFuels (BBF, formerly Biopalma) palm oil products are exposed to deforestation, pollution, and social impacts (2). In 2020, BBF acquired Biopalma da Amazônia, the palm oil arm of mining company Vale, making it the largest producer of palm oil in Latin America (3). The transaction fits BBF's plans to expand oil palm cultivation in the states of Roraima and Pará, to expand its power generation capacity with palm oil as feedstock in the Amazon basin. The 2021 CRR research showed how BBF has cleared a total of 667 ha on its properties between August 2008 and July 2020, with 76 percent (506 ha) of the total deforestation taking place in reserved and permanent preservation areas (2). This new analysis in 2025 demonstrates that BBF continued to deforest and expand between 2023 and 2024 in Pará, after the EUDR and Mondelēz deforestation cut-off date of December 2020.

Other than environmental impacts, the company is tied to forced dispossession of land and related land disputes. Biopalma lands that are now part of BBF were bought from intermediaries that did not have legitimate claims on the lands, leading to numerous conflicts with local communities (4). The estimated 17,000 ha of Biopalma's landholdings in Moju, Acará, Concórdia do Pará and Tomé-Açu are "undocumented or have illegitimately acquired land titles" (5). Similarly, a report of the Instituto Nacional de Colonização e Reforma Agrária (INCRA) estimates that 37 percent of Biopalma's oil palm plantations in Concórdia do Pará were formerly owned by smallholder farmers. This has resulted in land conflicts with farming, indigenous and quilombola communities (6), reports of threats to farmers since BBF overtook Biopalma, falsification of documents, and even alleged torture of farmers by an armed group of BBF (7). In response, BBF states that it had to hire a security team to protect its staff from "constant attacks and threats," reportedly "from isolated leaders who do not represent the communities." (*Ibid.*) In 2023, the Brazilian Human Rights Council asked banks to suspend finance to BBF (8).

Both 'Biopalma da Amazonia' mills 1 and 2 (now owned by BBF) are listed as Tier-2 suppliers of Mondelēz in its latest palm oil mill list (updated in January 2025), indirectly supplied through Tier-1 supplier Bunge (9). Keeping those mills in a public palm oil mill list while the company may no longer source from them may reveal that Mondelēz' due diligence is incomplete and non-transparent, while making it difficult for watchdogs' organisations to track sustainability progress and compliance publicly.

- (1) Rural Environmental Registry (CAR) Pará, online: <https://car.semam.pa.gov.br/#/>, viewed in October 2025.
- (2) Chain Reaction Research (2021), online: <https://chainreactionresearch.com/report/palm-oil-production-in-brazilian-amazon-threatens-ndpe-commitments>, viewed in October 2025.
- (3) ICOCA, online: https://icoca.ch/es/case_studies_topic/brasil/, viewed in October 2025.
- (4) Repórter Brasil, online: <https://reporterbrasil.org.br/2012/12/denuncias-de-violencia-e-trabalho-escravo-envolvem-cultura-do-dende-no-para>
- (5) CIFOR, online: https://www.cifor.org/publications/pdf_files/WPapers/WP198CIFOR.pdf
- (6) Rio on Watch (2019), online: <https://rioonwatch.org/?p=52631>, viewed in October 2025.
- (7) O Liberal (2021), online: <https://www.oliberal.com/politica/alepa-e-ctp-cobram-investigacao-sobre-a-bbf-1.447660>, viewed in October 2025.
- (8) Forest & Finance (2023), online: <https://forestsandfinance.org/news/brazilian-human-rights-council-asks-banks-to-suspend-finance-to-brasil-biofuels/>
- (9) Mondelēz palm oil mill list 2023 (updated 20 January 2025), online: <https://www.mondelezinternational.com/assets/Snacking-Made-Right/ESG-Topics/Palm-Oil/MDLZ-Palm-Oil-Mill-List.pdf>.

PT Hardaya Inti Plantations (HIP)

Location: Buol, Sulawesi Tengah

Biome: Sulawesi Lowland Rainforest
(Indonesia)

Area concession (ha): 27,642

Coordinates: 0.90162, 121.47887

Cleared Area

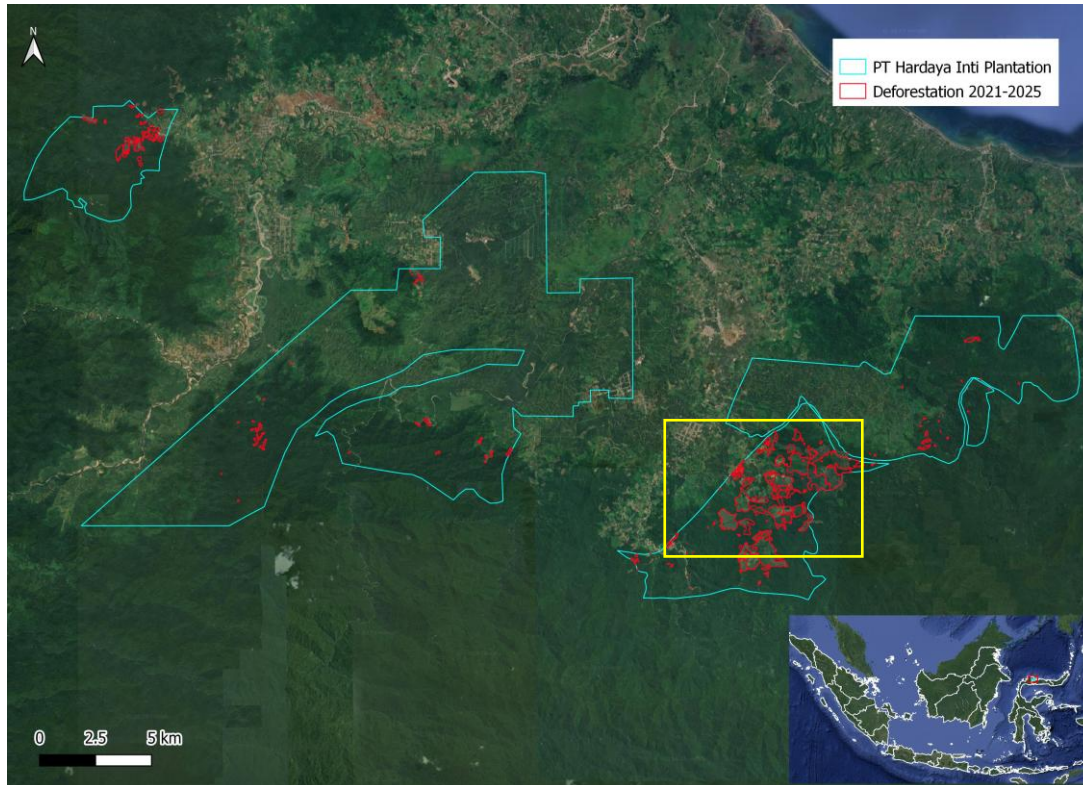
1,193

hectares

Period clearance:

January 2021 – September 2025

Type of vegetation: Forest
on Mineral Soil



Imagery upper left: overview of PT Hardaya Inti Plantations (PT HIP) concessions in Buol district (blue polygons) and cleared area (red polygons). Middle and bottom left imagery: Before and after clearing images of primary forest PT HIP concessions between 2021 and 2025. Source: AidEnvironment, based on [Nusantara Atlas](#), Hansen et al., 2013. "High-Resolution Global Maps of 21st-Century Forest Cover Change." Imagery © 2025 Planet Labs PBC. According to [Nusantara Atlas](#), the PT HIP concessions now cover approximately 27,643 ha, including the southern area where the deforestation has been detected.



January 2021



September 2025



Imagery above: Satellite photo indicating that what SIGAP-KLHK classified (and released) as non-forest area is actually still standing forest (see also next page for more explanation). Source: Google Earth, July 2025.

PT Hardaya Inti Plantations (HIP)

Ownership & Business relationship

Owner:

Central Cipta
Murdaya (CCM)

Mondelēz response:

The company did not respond after repeated requests in November 2025.

Environmental fines, embargoes, and suspensions

Suspensions/fines

Yes, HIP was fined 1 billion rupiah in 2024 for not paying plasma scheme farmers

Case description

There is continued primary forest loss in the PT Hardaya Inti Plantations (PT HIP) oil palm concession in Buol, Sulawesi. A combined Nusantara Atlas (1) and AidEnvironment analysis detected 1,193 hectares of forest loss in the plantation between 21 October 2024 and 16 October 2025, which includes undisturbed evergreen primary forests. The cleared area is classified as 'forest formation' according to MapBiomass (2) and the EU Forest Observatory map (3), and visual analysis by AidEnvironment confirms standing forest on the spot (see photo previous page). Nevertheless, the Indonesian government (SIGAP-KLHK) has classified part of the concession as unproductive convertible forest and subsequently released it into non-forest status (4). Therefore, PT HIP may develop it for oil palm plantation if they hold the Right to Cultivate (HGU). Under these circumstances, land clearing and plantation development are considered legally compliant with Indonesian regulation, despite the area being covered with forest vegetation and noncompliance under the EUDR.

PT HIP's parent company is Central Cipta Murdaya (CCM), an Indonesian conglomerate active in agriculture, property, infrastructure, and manufacturing. Known for operating oil palm concessions—including PT HIP—CCM has faced scrutiny for environmental impacts and deforestation, especially in Sulawesi, through its subsidiary companies. In 2018, PT HIP came under public scrutiny after being granted a 9,964-hectare concession by KLHK only two months after the Presidential instruction on the palm oil moratorium was issued (5). Apart from forest loss, news articles point to several allegations of social impacts linked to PT HIP, including community clashes and substantiated claims that the company continually clears land inside regions officially designated as natural forest, exploiting the regulatory loophole that allows clearing within licensed concessions (6, 7, 8). Forum Asia amplifies voices from affected local groups, highlighting how Hardaya Inti Plantations' forest destruction is allegedly inflicting ecological harm and food insecurity on subsistence communities; their June 2025 advocacy notes explicit violations of customary rights and ecosystem stewardship (8). PT HIP was fined by the state last year for failing to pay farmers under the plasma scheme (9).

The fresh fruit bunches harvested in the cleared PT HIP oil palm plantation are likely supplied to the nearby, approximate 1-hour drive to the PT HIP LEOK palm oil mill (coordinates: 1.026389, 121.360833). Despite other publicly available corporate grievance trackers from for instance Wilmar, Hershey, and Fuji Oil, that report to suspend or examine sourcing from PT HIP and its linked plantations and mills (10), Mondelēz continues to report sourcing from the Hardaya Inti Plantations LEOK mill through AAK and Bunge on its latest palm mill list (11). Keeping the controversial LEOK mill in a public palm oil mill list while Mondelēz may no longer source from them may reveal that the Mondelēz' due diligence is incomplete and non-transparent, while making it difficult for watchdogs' organisations to track sustainability progress and compliance publicly.

- (1) Nusantara Atlas, online: <https://nusantara-atlas.org/>, viewed in October 2025.
- (2) Mapbiomas Indonesia, online: <https://mapbiomas.nusantara.earth/>, viewed in October 2025
- (3) EU Observatory Forest map, online: <https://forest-observatory.ec.europa.eu/forest/gfc2020>, viewed in October 2025.
- (4) Kementerian Lingkungan Hidup dan Kehutanan (KLHK), online: <https://www.menlhk.go.id/>, viewed in October 2025.
- (5) Dari Inpres Moratorium Sawit Hingga Kebijakan Tata Kelola Industri Sawit Presiden Jokowi: Studi Kasus Penerbitan SK Pelepasan Kawasan Hutan PT Hardaya Inti Plantations di Buol, Sulawesi Tengah (2019), online: <https://jhli.icel.or.id/index.php/jhli/article/view/122>, viewed in Nov 2025.
- (6) Mongabay (2019), online: <https://news.mongabay.com/2019/02/indonesian-minister-blasted-over-palm-permit-for-graft-tainted-concession/>, viewed in October 2025.
- (7) Mongabay (2024), online: <https://news.mongabay.com/2024/06/indonesian-palm-oil-firm-clashes-with-villagers-it-allegedly-shortchanged>, viewed in October 2025.
- (8) Forum Asia (2025), online: <https://forum-asia.org/buol/>, viewed in October 2025.
- (9) Mongabay (2024), online: <https://news.mongabay.com/2024/07/palm-oil-company-fined-for-cheating-sulawesi-farmers-to-reap-their-due-rupiah>, viewed in October 2025.
- (10) See for instance Grievance Trackers of Wilmar (<https://www.wilmar-international.com/sustainability/grievance-procedure>),
- (11) Mondelēz palm oil mill list 2023 (updated 20 January 2025), online: <https://www.mondelezinternational.com/assets/Snacking-Made-Right/ESG-Topics/Palm-Oil/MDLZ-Palm-Oil-Mill-List.pdf>.

ETS Tchouala Cooperative

Location: Nkondjok; Littoral; Nkam

Biome: Tropical & Subtropical Moist Broadleaf Forests (Cameroon)

Coordinates cooperative: 10.26750, 4.94583

Cleared Area

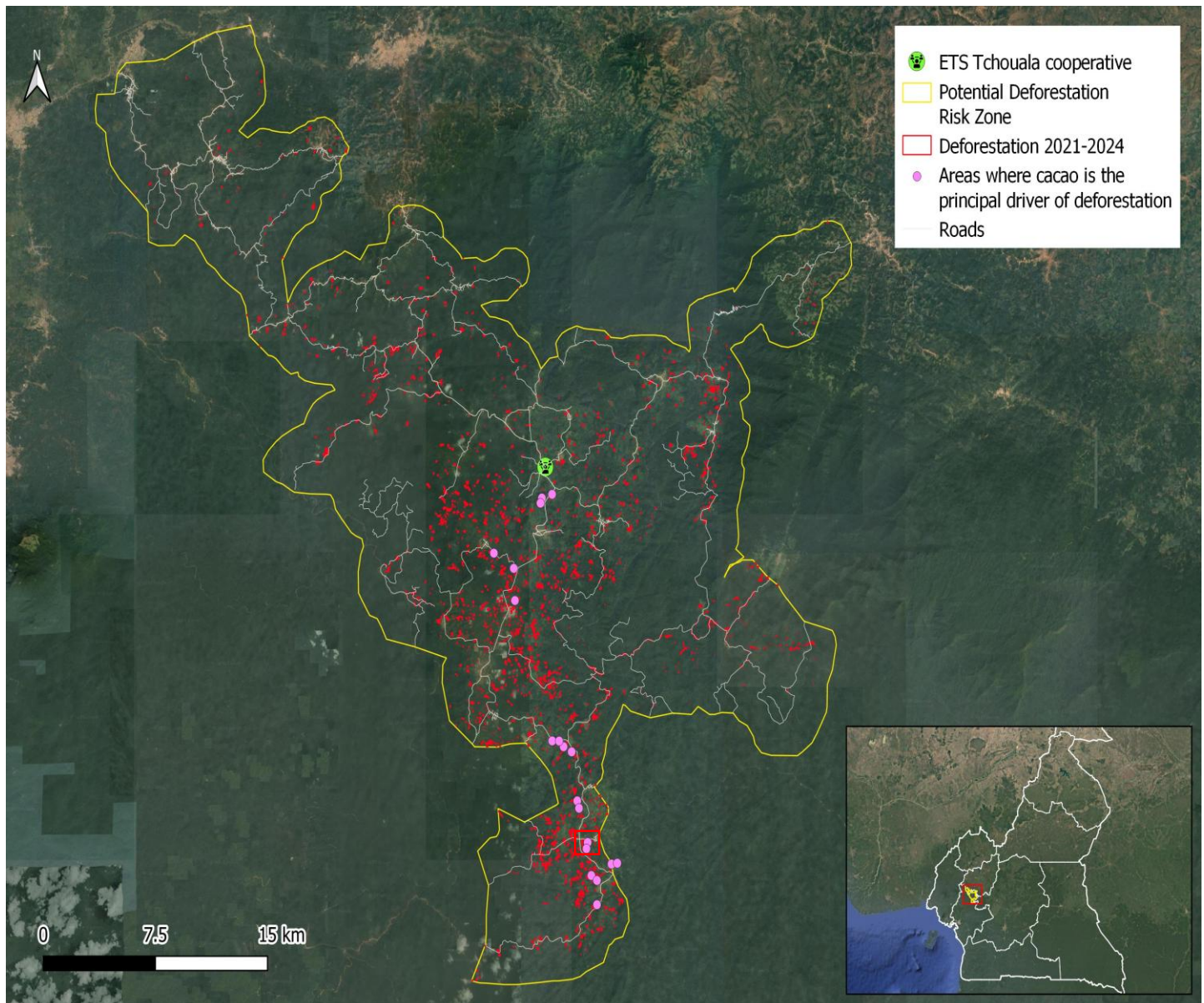
716

hectares

Period clearance:
2021-2024

Type of vegetation:
Cameroon Highlands Forests

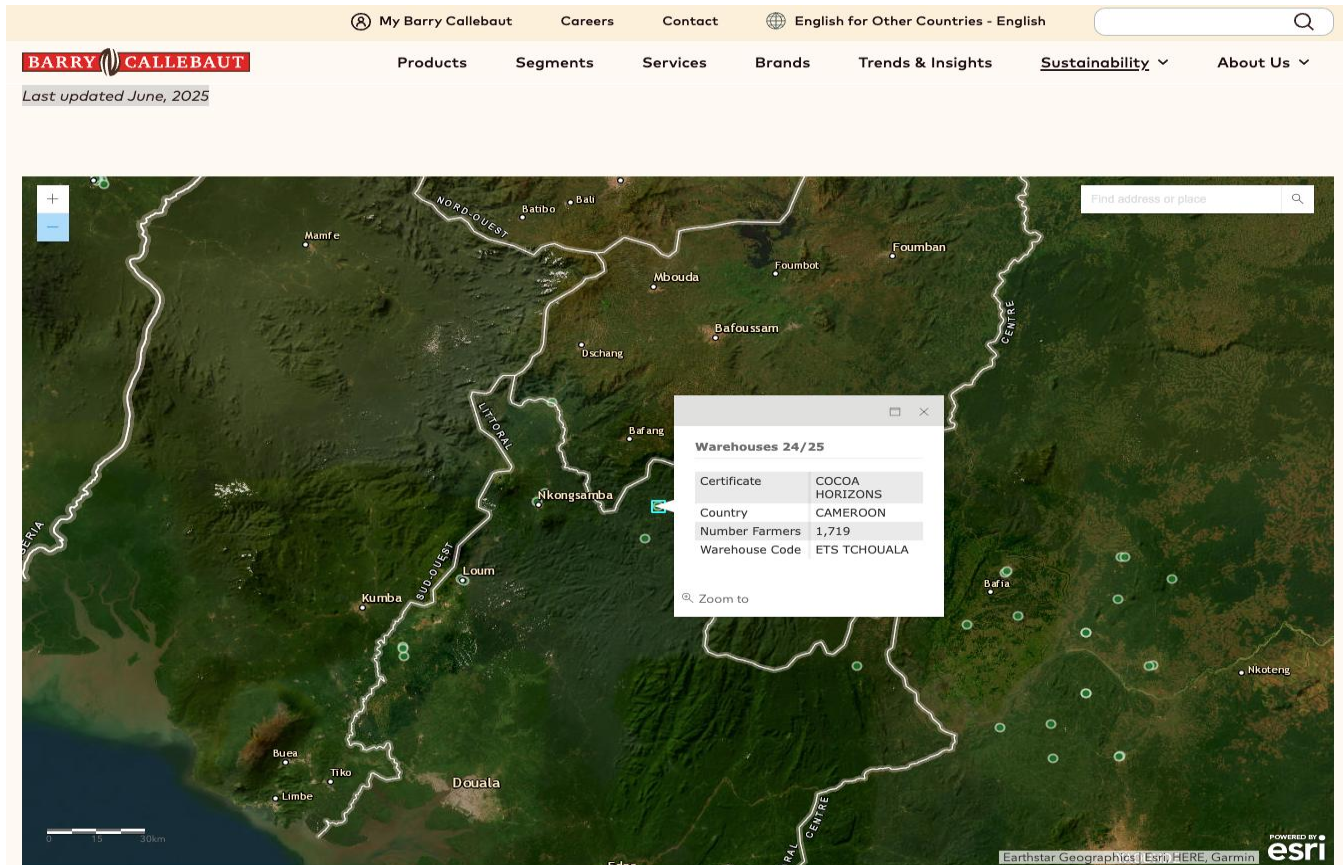
Imagery: Cocoa deforestation risk zone linked to Barry Callebaut's (Tier-1 supplier to Mondelēz) supplying cocoa cooperative ETS Tchouala Cooperative in Littoral district in Nkam department (Cameroon)



Source: AidEnvironment, based on publicly available information for Cameroon, including deforestation data from January 2021 till December 2024 from [Hansen et al., 2013](#). "High-Resolution Global Maps of 21st-Century Forest Cover Change."; OSM Administrative boundaries and roads; company cooperative disclosures; WDPA Protected areas; [EU Sustainable Cocoa Programme](#) "Cameroon Cocoa Extent 2020". The pink dots refer to areas where cacao is the principal driver of deforestation, as visually confirmed in a field study by [Mighty Earth/CODED](#). The red rectangle points to the 'area zoom' in the next page. **Note:** While there is a higher total amount of native vegetation loss in this "deforestation-risk zone", AidEnvironment has only included in the "deforestation 2021-2024" layer the loss of forest (as defined by the EU Forest Observatory) in the 2020 Cameroon Cocoa Extent [layer](#).

ETS Tchouala Cooperative

Screenshot of Barry Callebaut's cocoa suppliers in Cameroon, indicating that cocoa cooperative ETS Tchouala is an active supplier of Barry Callebaut, one of Mondelēz' main Tier-1 suppliers.



Source: Barry Callebaut cocoa suppliers, last updated June, 2025. Online: <https://www.barry-callebaut.com/en/sustainability/our-sustainable-raw-materials/transparency-and-traceability-our-cocoa-supply-chain>, viewed in November 2025.



Imagery: Cocoa farm with deforestation (red polygon) inside ETS Tchouala cocoa deforestation risk zone in Nkondjok Arrondissement, in Littoral district, in Nkam department (Cameroon)

Source: AidEnvironment, based on deforestation data from January 2021 till December 2024 from [Hansen et al., 2013](#). "High-Resolution Global Maps of 21st-Century Forest Cover Change"; [Mighty Earth/CODED](#) field research. The cleared vegetation in the red polygon (2.3 hectares) is classified as forest by the FAO. Coordinates of the deforestation: 4.754618, 10.293049. See also red box in the previous page imagery for the location of this area within the ETS Tchouala buying zone.

ETS Tchouala Cooperative

Ownership & Business relationship

ETS
Tchouala

Mondelēz response:

The company did not respond after repeated requests in November 2025.

Certification status

- No certification status was identified for ETS Tchouala Cooperative.

Case description

AidEnvironment detected 716 hectares (ha) of native vegetation (Cameroon Highlands Forests) clearing in the deforestation-risk buying zone of the cocoa Cooperative ETS Tchouala between January 2021 and December 2024. The cleared vegetation is classified as forest under the FAO definition and EUDR definition (1). A June 2025 CODED-Mighty Earth field study (2) visually confirmed cocoa-related deforestation in numerous data collection points in this buying zone of the Cooperative located in the Nkondjok Arrondissement, in Littoral district, Nkam department (Cameroon) (see also previous pages). In addition, interviewed farmers confirmed new and recent clearing for cocoa production, primarily driven by the decline in global coffee prices (*ibid*). Moreover, communities interviewed in Nkondjok area indicated that "deforestation is typically driven by a combination of economic necessity and the availability of unclaimed forest land."

Mondelēz does not disclose its Cameroonian cocoa suppliers (3), despite Cameroon being part of Mondelēz' Cocoa Life programme (4). Considering Barry Callebaut's key role as a cocoa exporter of Cameroon under its subsidiary Sic Cacaos (2nd largest cocoa exporter after KSW Global) (5) and being a Tier-1 supplier of Mondelēz in Côte d'Ivoire (3), it is very likely that Barry Callebaut will also supply Mondelēz from Cameroon. Cooperative ETS Tchouala is listed as an active supplier of Barry Callebaut under its Cocoa Horizons Programme in June 2025, with a supplier base of 1,719 farmers in the cooperative surrounding region (6). The cooperative is therefore also a likely (indirect) Tier-2 cocoa supplier to Mondelēz.

Informal "coxeurs", who purchase cocoa from the farmers and sell to cocoa traders, play a pivotal role in Cameroon's cocoa supply chain. In Mighty Earth's-CODED field visit, interviewed cocoa farmers in the cleared areas mainly sold cocoa to these intermediary supply chain actors. Only few farmers "had any knowledge of their cocoa's final destination, and even cooperative representatives admitted they do not track where the cocoa ends up once aggregated and sold" (2).

All identified clearing occurred after Mondelēz' pledge for deforestation-free cocoa with a 31 December 2020 cut-off date. Mondelēz may not be able to achieve negligible risk in their due diligence efforts under its own company commitments or the EUDR when indirectly buying cocoa beans from ETS Tchouala Cooperative, through Cameroon's second largest cocoa exporter Barry Callebaut.

- (1) EU Forest Observatory, online: <https://forest-observatory.ec.europa.eu/forest>, viewed in October 2025.
- (2) Mighty Earth-CODED (June 2025), *Cameroon on the Brink: Cocoa's new deforestation frontier*, online: <https://drive.google.com/file/d/1BmtvL-8EBM2M5191nNQIBLZPkFupGQo/view>, viewed in November 2025.
- (3) Mondelēz public Cocoa [Tier-1 and Tier-2 Supplier List](#) (2021), viewed in October 2025.
- (4) Cocoa Life Programme Mondelēz, online: <https://www.cocoalife.org/in-the-cocoa-origins/>, viewed in November 2025.
- (5) Sample of recent Cameroonian cocoa export data between 31 January 2025 and 21 July 2025 for HS codes 1801 till 1806.
- (6) Barry Callebaut – Cocoa Suppliers, online: <https://www.barry-callebaut.com/en/sustainability/our-sustainable-raw-materials/transparency-and-traceability-our-cocoa-supply-chain>, viewed in November 2025.

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