June 2026

Compliance Checker

Brazilian cocoa sustainability risk profile

Nine potential noncompliance cocoa case studies in Brazil's Pará and Bahia states relevant under social and environmental due diligence regulation

Executive Summary

This Compliance Checker **cocoa sustainability risk profile** of Brazil's main cocoa production states Bahia and Pará analyses potential noncompliance cocoa risk cases in the scope of environmental and social due diligence regulation, including the Brazilian Forest Code, the EU regulation on deforestation-free products (EUDR), and the EU Corporate Sustainability Due Diligence Directive (CSDDD). The analysis maps Brazil's role and context within global cocoa trends, the country's cocoa sourcing areas, its link to deforestation hotspots, social and labour issues, and the location of assets and infrastructure linked to domestic and international cocoa markets, with a specific focus on the European bloc.

In the projected growth of the Brazilian cocoa sector, producers present cocoa as an important crop for forest protection and the restoration of degraded land. In the main producing states of Pará and Bahia, which span the Atlantic Forest, Amazon and Cerrado biomes, cocoa production appears to have a lower environmental impact than soy and beef. There also seems to be a clear strategy to expand cocoa cultivation on former pastureland.

Nevertheless, this Compliance Checker report found cases of cocoa expansion linked to deforestation, fines and embargoes, invasion of indigenous territories, and exploitative labour conditions, including conditions analogous to slave labour. Key cocoa purchasing and processing companies in Brazil, largely controlled by Barry Callebaut, Cargill, and Olam Food Ingredients (Ofi), may therefore not be able to achieve negligible risk in their due diligence efforts under the various legislative initiatives when buying and processing cocoa beans in Brazil, potentially from the farms in the nine exemplary cases covered in this report. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders. This calls for robust due diligence systems and regular checks to better understand and manage possible deforestation and legal risks, including in cocoa supply chains that are generally considered sustainable.

Methodology

AidEnvironment has performed an independent Compliance Checker study on the cocoa sector in Brazil. The study's scope does not cover a complete cocoa sector assessment based on in-depth fieldwork and stakeholder consultations, nor is it based on a full legal compliance analysis. Instead, it zooms in on certain regions, localities, and case studies, focused on Brazil's two major cocoa production states: Bahia and Pará. In these areas, we have analysed, based on publicly available data sources, key cocoa infrastructure, key production areas, type of production (e.g. plantations versus agroforestry), recent cocoa expansion areas, key stakeholders, downstream supply chain links to European markets, and coupled this with potential noncompliance cases based on remote geospatial analysis.

Key element of the report is the demonstration of nine exemplary cases of cocoa farms that have either forest clearing since the EUDR cut-off date, or have potential legality issues, that might be noncompliant with the EUDR if the cocoa beans produced on the cleared plots would enter the EU market when the law enters effect from 31 December 2026, or with the CSDDD, which entered into force on July 25, 2024. The CSDDD forces large companies to identify, prevent, and mitigate adverse human rights and environmental impacts in their operations and global value chains, and at least large cocoa traders Barry Callebaut, Olam, and Cargill fall within the scope of the Directive.

The report's case studies have been shared with various cocoa producers, traders and processors (Barry Callebaut, Ofi, Cargill, Schmidt Agrícola, CJ 2 Participações, Santa Colomba Agropecuária) for further engagement in May 2026, and the companies' responses (if available) have been integrated into the report.

General recommendations

(all cocoa sourcing companies, Tier 1 & Tier 2)

- ✓ Adopt and enforce a unified deforestation-free, legally compliant, and socially responsible cocoa sourcing policy, ensuring full supply chain transparency and plot-level traceability (including direct and indirect suppliers, intermediaries, and sourcing regions).
- ✓ Implement clear and harmonised response protocols for verified non-compliance, including immediate suspension of direct and indirect sourcing linked to post-cut-off deforestation, illegal conversion, or severe labour and land-rights violations, until independent remediation is confirmed.
- ✓ Require suppliers to demonstrate compliance through robust due diligence systems covering environmental, labour, land-tenure, and legality risks, supported by binding contractual obligations and corrective action mechanisms.
- ✓ Strengthen monitoring systems through integrated satellite monitoring, third-party audits, and community-based verification, complemented by harmonised risk assessment tools, grievance mechanisms, and remediation procedures.
- ✓ Ensure regular public reporting on key KPIs, including traceability coverage, sourcing risks, verified deforestation-free volumes, remediation cases, and grievance outcomes.
- ✓ Scale investment in jurisdictional and landscape approaches that contribute to forest protection, ecosystem restoration, climate resilience, and sustainable livelihoods.
- ✓ Strengthen community participation in monitoring, grievance reporting, and remediation processes.
- ✓ Develop alternative livelihood and income models to eliminate incentives for forest clearing.

Brazil-specific recommendations

- ✓ Require robust verification that cocoa expansion occurs on legal, degraded, or previously converted land, supported by transparent land-use history analysis, satellite monitoring, and compliance with the Brazilian Forest Code and EUDR.
- ✓ Apply differentiated risk assessments across sourcing regions, distinguishing between established restoration systems and high-risk areas linked to recent deforestation, embargoes, labour violations, or land conflicts.
- ✓ Enforce strict no-conversion sourcing requirements combined with clear remediation and supplier improvement pathways.
- ✓ Integrate Brazilian public datasets into risk screening systems, including INPE (PRODES, DETER, TerraClass), MapBiomas, IBAMA embargo lists, CPT conflicts, labour inspection data, and alerts.
- ✓ Align corporate monitoring systems with national and state initiatives (e.g. Inova Cacau 2030, CEPLAC), while ensuring independent satellite monitoring and third-party verification remain in place.
- ✓ Alignment with Inova Cacau 2030 (70% traceability target) alone is not sufficient to meet EUDR requirements, especially where traceability is incomplete or limited to illegal deforestation; companies should ensure 100% plot-level traceability for EU-bound cocoa, full deforestation-free and legality checks, and safeguards against simplified agroforestry or full-sun monoculture expansion.
- ✓ Require plot-level traceability and verification of compliance with environmental, labour, and land-tenure legislation across all Brazilian sourcing (direct and indirect).
- ✓ Invest in landscape protection mechanisms, including Indigenous and community-based monitoring, fire prevention, ecological restoration, and conservation financing.
- ✓ Promote living wage policies and measures to address labour-related violations, particularly through partnership and sharecropping arrangements, among both direct and indirect suppliers.
- ✓ Promote and implement a transition to diverse, biodiversity-rich agroforestry systems through clear minimum standards, long-term farmer support and training, and incentives that reward complex agroforestry systems and discourage simplification or conversion to monocultures.

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Introduction: The Brazilian cocoa sector

Brazil is recently strongly growing their cocoa sector, to meet both domestic and export demand for cocoa products. In the projected growth of Brazil's cocoa sector, cocoa growers present cocoa as an important crop for the **protection of forests** and **restoration of degraded areas**. There are an estimated 26 million hectares (ha) of degraded land suitable for agricultural production without further deforestation in Brazil. A 2022 cocoa study in Pará, Brazil's main cocoa production state, demonstrated that **89%** of the cocoa area planted had already been deforested before 2008—the cut-off date for deforestation defined by the Brazilian Forest Code.

Under Brazil's Ministry of Agriculture and Livestock (MAPA), developed by CEPLAC in partnership with **CocoaAction Brasil**, an initiative of major cocoa and chocolate companies, the "**Inova Cacau 2030 Plan**" seeks to revitalize 100,000 ha of production areas and expand cocoa production area by at least **120,000 ha** on degraded pastureland by 2030, supported by technical guidance to strengthen cocoa production. The plan is "*to consolidate Brazil as the benchmark of sustainable cocoa origin for the world, focusing on the conservation of production and the guarantee of improved living and working conditions throughout the chain.*"

This is good news for (future) specialty cocoa products from Brazil marketed in the EU, especially under demand-side regulations to halt deforestation, such as the EU regulation on deforestation-free products (**EUDR**), that requires that companies must ensure that relevant products are deforestation-free, legally produced, and traceable to their exact plot of origin.

Compliance Checker study on the Brazilian cocoa sector

AidEnvironment has performed an independent **Compliance Checker** study on the cocoa sector in Brazil. The study's scope does not cover a complete cocoa sector assessment based on in-depth fieldwork and stakeholder consultations, nor is it based on a full legal compliance analysis. Instead, it zooms in on certain regions, localities, and case studies, focused on Brazil's two major cocoa production states: Bahia and Pará. In these areas, we have analysed, based on publicly available data sources, key cocoa infrastructure, key production areas, type of production (e.g. plantations versus agroforestry), recent cocoa expansion areas, key stakeholders, downstream supply chain links to European markets, and coupled this with potential noncompliance cases based on remote geospatial analysis.

Conclusion

Cocoa growers in Brazil present cocoa as an important crop for forest protection and the restoration of degraded land. In the main producing states of Pará and Bahia, which cover parts of the Atlantic Forest, Amazon and Cerrado biomes, cocoa production seems to have lower environmental impacts than soy and beef. There also appears to be a clear strategy to expand cocoa cultivation on former pastureland. At the same time, this Compliance Checker report identifies cases where cocoa expansion is linked to deforestation, embargoes, overlaps with Indigenous territories, and labour conditions analogous to slavery.

Key cocoa purchasing and processing companies in Brazil, largely controlled by Barry Callebaut, Cargill, Ofi, may therefore not be able to achieve negligible risk in their due diligence efforts under the various legislative initiatives when buying and processing cocoa beans in Brazil, potentially from the farms in the nine exemplary cases covered in this report. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders. This calls for robust due diligence systems and regular checks to better understand and manage possible deforestation and legal risks, including in cocoa supply chains that are generally considered sustainable.

Introduction: The Brazilian cocoa sector

Less exposed to cocoa-related deforestation, labour rights violations remain a risk

While cocoa production in Brazil has relatively much lower direct environmental impacts than soy and beef, there is still **risk for cocoa expansion** to be linked to deforestation, exploitative labour conditions, and land title irregularities, in various key Brazilian ecosystems, including the Amazon, Atlantic Forest, and Cerrado biomes. While large cocoa farms and plantations in Latin America, especially Brazil, may be less exposed to cocoa-related deforestation, the scale of cocoa production depends on hired labour, and may include **labour violations**, such as conditions analogous-to-slave-labour or child labour. A 2024 International Trade Union Confederation (ITUC) analysis on labour rights violations considered Brazil, Mexico and Peru with "systematic violations of rights", although the rating improved under the Lula administration.

For this study, Repórter Brasil analysed labour inspection data in a sample of 43 cocoa farms in Pará (26 farms), Bahia (10 farms), Espírito Santo (6 farms), and Rondônia (1 farm), revealing that 18 farms out of the 43 cocoa farms (42%) were caught subjecting workers to **conditions analogous to slavery** between 2008-2025, and 37 out of the 43 farms (86%) reported **other labour infractions** in that period. Some of these cases are covered in the case study section of this report (from page 13). Labour infractions may pose due diligence risks under the **CSDDD**, given its focus on adverse human rights impacts in value chains and may also be relevant under the **EUDR legality requirement**, where products must comply with the laws of the country of production, including applicable labour laws.

Figure 1 shows that cocoa-linked deforestation in **southern Bahia** declined significantly between 2004 and 2024, although cocoa (and coffee) were previously the main drivers of Atlantic Forest deforestation in the region. In southern Bahia, AidEnvironment identified relatively small pockets of recent cocoa-linked deforestation, especially compared with the scale of cattle- and soy-related deforestation elsewhere in Brazil. Nevertheless, the total deforestation within a sample of 60 farms with cocoa cultivation reached up to 164 hectares between 2021 and mid-2026. This only includes forest vegetation covered by the EUDR/FAO forest definition.

A challenge specifically for Brazil is that part of the deforestation in country is still considered **legal deforestation** under the Brazilian Forest Code. Moreover, under certain political waves, enforcement of forest protection is weakened, as happened in Brazil under Bolsonaro. The crux will be to end all deforestation for cocoa (and other commodities), whether legal or illegal, and to transition all cocoa production towards diverse agroforestry systems.

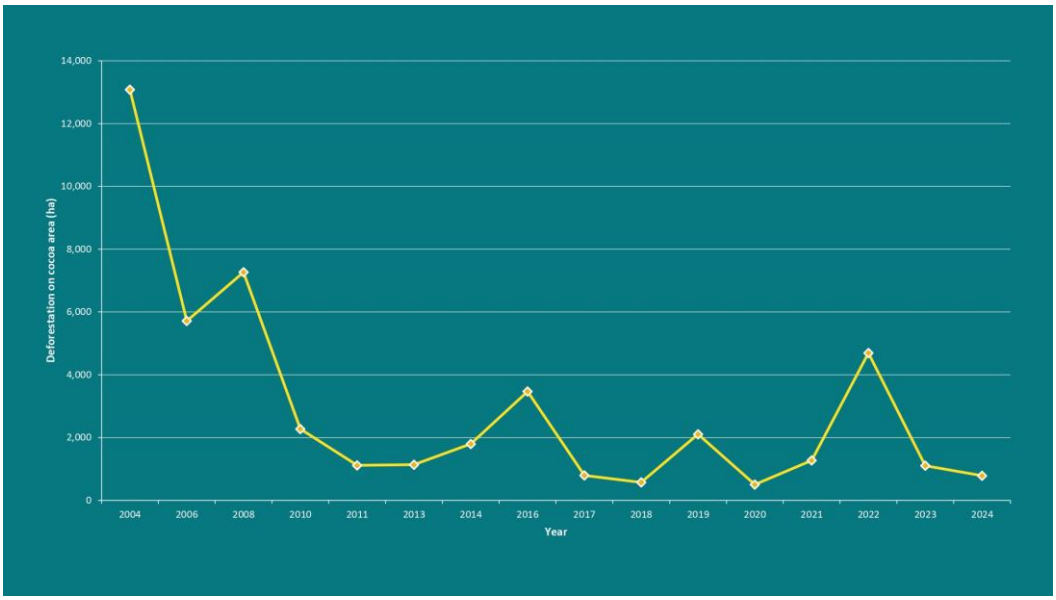


Figure 1. Bahia cocoa area overlapped with deforestation between 2004-2024. Source: AidEnvironment, based on PRODES Mata Atlantica 2004-2024 and Mapbiomas Brazil Cocoa area. Note: a similar figure could not be developed for Pará, as Mapbiomas cocoa area is only available for the southern Bahia state.

A final risk to highlight is that **imported deforestation** may also enter Brazilian cocoa supply chains through cocoa imports from countries such as Cameroon, Côte d'Ivoire, Nigeria and Ghana. Brazil is a net importer of cocoa, and sourcing from countries such as Cameroon, which has been identified as an emerging frontier for cocoa-driven deforestation, could create additional exposure from Brazil to imported deforestation risks and social impacts from African cocoa supply chains.

Introduction: The Brazilian cocoa sector

Global cocoa trends: West African production crisis, initial opportunity for Brazil

The 2023/24 global cocoa season concluded with a substantial **deficit** of 489,000 tonnes, mainly due to struggles with reduced yields from plant disease, illegal mining, aging trees, and extreme weather in West African countries, notably Côte d'Ivoire, Ghana, Cameroon, and Nigeria, that are jointly responsible for 65 percent of the global supply. The lack of supply caused global **cocoa bean prices to reach record high levels** in 2024 and early 2025, further driving considerable investments in the Brazilian cocoa sector, mainly in Bahia state, with investors anticipating making the country a major supplier of the key ingredient in chocolate. Brazil, an **agricultural powerhouse**, is seen as an **attractive location** for cocoa traders and processors, since it is both a cocoa producer and a major consumer, has availability of land, credit, technology, strong institutions and industry-government collaboration, sustainable initiatives such as CocoaAction Brasil, as well as advanced environmental and social legislation (e.g. Brazilian Forest Code).

Nevertheless, in March 2026, Reuters stated that "*Brazil's dreams for industrial-scale cocoa farms faded after price crash*", resulting from a **70% dive in cocoa prices** from their 2024 record high. The recovery of African cocoa production, increased inputs from other producers such as Ecuador, and reduced consumer demand from the earlier higher chocolate prices have caused this latest global shift.

Reportedly, an estimated **75,000 hectares** of planned irrigated cocoa fields in northeastern Brazil - backed by Cargill, Barry Callebaut, and Swiss investment firm NewAg Partners (Table 1 below) – may be cut by half from the cocoa price crash, eliminating potential production of 225,000 tonnes that would have covered nearly 5% of global demand. The **price collapse** has led to unrest among smaller farmers, who recently blocked a key road to the port of Ilhéus in Bahia in protest against African cocoa imports, after which the Ministry of Agriculture temporarily suspended imports from Côte d'Ivoire.

Industry projections now point to sustained cocoa production and expansion in Brazil, but at a **slower pace** and smaller scale. As in any commodity market, it is expected that cocoa prices will eventually recover.

Linked to these large industry cocoa expansion (Table 1), Canopée has flagged a risk for excluding small cocoa producers from European supply chains, specifically pointing to already ongoing investments of Barry Callebaut and Mars in large-scale cocoa plantations in Brazil and Colombia.

Cocoa expansion plans in Bahia state in Brazil's Cerrado affected by global cocoa price collapse

Producers/investors	Details
Moisés Schmidt/Schmidt Agrícola (BR producer) – with Cargill	Moisés Schmidt, owner of Schmidt Agrícola, known as the "King of Cocoa", and one of Brazil's largest cocoa producers, planned a $300 million project to cultivate 10,000 ha of (monoculture) cocoa in Riachão das Neves in Bahia, Brazil. The initial phase of cultivation of high-yield cocoa trees in the open sun, fully irrigated and fertilized, has reportedly already started on about 400 ha in partnership with Cargill. Schmidt declined to comment on what the cocoa price collapse means for his own plans but stated that "*if the market remains below $5,000 per ton, more than 50% of the projects are gone*".
NewAg Partners (Swiss)	Switzerland-based investment firm NewAg Partners has reportedly suspended an 8,900-hectare project in Bahia due to the recent global cocoa price decreases.
Copa Investimentos (BR, SP), Apolonio Sales	São Paulo-based asset manager Copa Investimentos, with investments in agriculture and forestry, was planning an industrial-scale cocoa farm but its partner Apolonio Sales is reportedly currently reconsidering the investment.
Cooperative Cooabriel (BR) - with Cargill	Coffee cooperative Cooabriel was launching a cocoa pilot project in southern Bahia in 2025 in collaboration with Cargill, reportedly now only continuing as a small-scale initiative.
Fazenda Santa Colomba - with Barry Callebaut	Barry Callebaut and Fazenda Santa Colomba are said to be in talks on an investment to form a cocoa farm of 5,000-7,000 ha in the municipality of Cocos in Western Bahia.

Table 1: Overview of various planned cocoa investments in Bahia, Brazil. Source: News articles including Reuters (2026), Farmland Grab (2025), CPG (2025), Reuters (2025), The Rio Times (2026). Investors generally remain non-transparent over exact locations and investments.

Major cocoa producing states: Bahia, Pará

National Brazilian statistics point to **650,000 ha** of area planted with cocoa in 2025 (average size of properties is 6.5 ha), by an estimated **95,000** cocoa producers, of which approximately **74%** are classified as 'small' to medium-sized producers. In Brazil, small cocoa producers typically cultivate between five and ten hectares. The country's main cocoa producing states are Pará and Bahia, followed by Espírito Santo and Rondônia (Figure 2). The Brazilian Institute of Geography and Statistics (IBGE) disclosed **297,509 tonnes** of cocoa produced in Brazil in 2024, in contrast with the cocoa industry that disclosed **179,431 tonnes** in 2024 and **186,137 tonnes** in 2025. The industry reportedly "*uses a different methodology to forecast cocoa production and has historically provided lower estimates compared to IBGE.*"

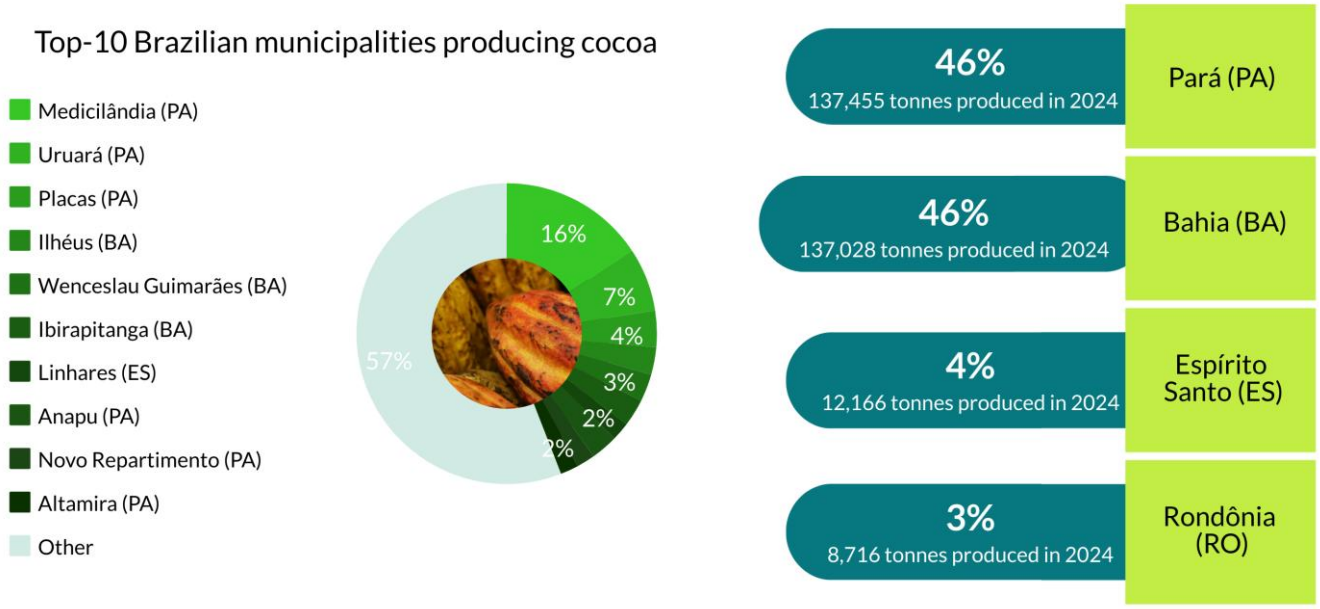


Figure 2. Main cocoa producing Brazilian states and municipalities.
Source: AidEnvironment, based on IBGE 2024

Cocoa grows best in hot and humid conditions with abundant rainfall and sunshine, typically around the equator. In **Bahia**, the Cerrado biome, 449,100 ha (~70% of total cocoa area) was recorded as cocoa planted area in 2025, compared to 170,622 ha (~26% of total cocoa planted area) in **Pará,** in the Amazon biome. Griding factories in Ilhéus, Bahia have an estimated annual processing capacity of over 300,000 metric tons of cocoa beans. The largest cocoa producing municipality in Brazil, Medicilândia in Pará, has an estimated **24,957 ha** of cocoa planted area. In **Espírito Santo** state, an estimated 16,091 ha was area planted with cocoa in 2025, compared to 6,427 ha in **Rondônia**. Older 2018 data respectively points to 41,000 and 27,800 cocoa producers in Bahia and Pará. In 2023 and 2024, Brazil's cocoa production suffered from heavy rains followed by high temperatures and droughts, severely impacting cocoa trees.

In Brazil, two typical cocoa production models are apparent: the **cabruca** system, an **agroforestry system** in which the cocoa is shaded under the canopy of the Atlantic Forest. Such systems support biodiversity, store carbon, improve soil moisture and fertility, aid pest control, and may regulate microclimates, including rainfall. But the Brazilian cocoa industry also expands in large, monoculture cocoa farms in the **cacau pleno sol** (cocoa in direct sun) system, that are fully irrigated and fertilized. A third system, **cocoa silvestre** (also referred to as "wild" cocoa in the forest) is not discussed here.

The next page provides an overview of the various land and production systems in Brazil. There is a wide range of agricultural systems referred to as agroforestry, potentially leading to a gap between the current reality of agroforestry in the cocoa sector and agroforestry reaching its full potential of environmental sustainability while contributing to farmers' livelihoods.

Introduction: The Brazilian cocoa sector

Various land and cocoa production systems in Brazil

Cabruca cocoa cultivation system with cocoa under Atlantic Forest canopy. Photo: CocoaAction Brasil

Planted cocoa agroforestry system. Photo: Disclosure Mapa

Production system (biome)	Traditional agroforestry (cabruca) (Atlantic Forest)	Planted agroforestry (Amazon)	"Cacau Pleno Sol" system (cocoa in full sun) (Cerrado)
System description	Traditional agroforestry system, with cocoa shaded under thinned native forest canopy of the Atlantic Forest biome	Designed/planted agroforestry system, mostly on degraded lands (~89% in Pará research)	Cocoa grown with no or minimal shade, often in monoculture or low-diversity systems
Dominant in Brazilian region	Southern Bahia (Atlantic Forest) in ~78% of cocoa farms; also present in Espírito Santo	Pará, also present in Rondônia (both Amazon)	Mainly in cocoa expansion zones in western Bahia (Cerrado)
Characteristics and methods	Traditional, mostly smaller scale producers, low use of techniques, equipment and machines, variety in species	Semi-mechanised, small-to medium-sized producers/family farmers, moderate inputs, high yielding cocoa varieties	Large, mechanised, high-tech farms, single-crop species, often fully irrigated and fertilized, use of agrochemicals, large producers
Potential advantages	Very high biodiversity, preservation of primary forest, resistant to climate and market shocks, reduced risk	Opportunity to restore degraded lands, prevent , moderate-high yields (~750-900 kg/ha)	Potential very high yields (~2,000-3,000 kg/ha), controllable and scalable conditions
Potential disadvantages	Mostly low yields (~150-300 kg/ha), more difficult to scale-up, prevent downgrading to planted/simple agroforestry, uncontrolled conditions (e.g. difficult to manage vegetation)	Planted agroforestry systems may replace more diverse biodiversity agroforestry systems, risk of encroaching agricultural activity	Simplified ecosystem without restoration aim, greater vulnerability to climate stress (e.g. drought) and price volatility (relies on high cocoa prices), higher risk for plant diseases, requires hired labour (involves risk of labour exploitation)

Table 2. Advantages and disadvantages of three cocoa production systems in Brazil. Source: Compilation by AidEnvironment, based on various sources, including *pers. comm*. Antonie C. Fountain of Cocoa VOICE Network (27 March 2026); Empraba & CocoaAction on cocoa production in Pará (2022); Floresta Viva Institute on cocoa production in Bahia (2020); VOICE Network Agroforestry Consultation Paper (2020); VOICE Network Cocoa Barometer Latin American Baseline (2022); Reuters (2025).

Under the **Brazilian Forest Code**, cocoa planting, with cocoa considered as a native tree from the Amazon, is recognized as a valid method to restore native tree vegetation under the law for converted forest areas since July 2008.

Cocoa in full sun plantation in Riachão das Neves, Bahia state. Photo: Still from video from Reuters, 2025

Brazilian cocoa imports and exports

Brazil: a net importer of cocoa products

Brazil imports more cocoa than it exports, mainly for fulfil its large domestic demand for chocolate consumption. Brazilian trade statistics point to over **90,000 tonnes** of Brazilian cocoa products exported to the world, of which about **9% to Europe**. Brazilian cocoa exports to the world are mainly in the form of chocolate and cocoa powder, while imports, over 112,000 tonnes, mainly consist of cocoa beans and cocoa paste/liquor (Table 3 below). Based on trade and production data, **domestic consumption** in 2024 is estimated at **303,483 tonnes**. This is in line with the National Cocoa Plan 2030, that states that "*Brazil still has a deficit in cocoa production to meet domestic and export demand, estimated at 300,000 tons/year*". In marketing year (MY) 2023/24, most Brazilian cocoa imports originated from **Côte d'Ivoire (40%), Ghana (37%),** and **Indonesia (40%)**. For **due diligence requirements** of chocolate manufactures, this may also entail **imported risks** of deforestation, child labour, and illegal cross-border trade from cocoa products, mostly in the form of beans and paste, originating from these countries.

Cocoa product (HS code)	Brazil cocoa exports 2025 (tonnes)		Brazil cocoa imports (tonnes)		Production of cocoa (tonnes)	
	To **world**	To **EU** (% of total)	In **2024**	In **2025**	In **2024**	In **2025**
Beans (1801)	378	133 (35%)	25,674	42,159	No specified data	
Shells (1802)	153	131 (86%)	9,240	8,705	No specified data	
Paste/liquor (1803)	6,489	107 (2%)	23,832	27,050	No specified data	
Butter (1804)	16,481	1,556 (9%)	865	955	No specified data	
Powder (1805)	29,984	6,179 (21%)	16,493	14,840	No specified data	
Chocolate (1806)	36,779	232 (1%)	20,500	19,140	No specified data	
Total	**90,264**	**8,338 (9%)**	**96,604**	**112,849**	**297,509***	**186,137****

Table 3. Brazil cocoa exports and imports. Source: compiled by AidEnvironment, based on Brazil Comex Stat (data updated in March 2026); *IBGE/FAOSTAT 2024; ** AIPC/Sindidados 2025. Notes: based on the following formula for domestic consumption = ((production + import) – export) and IBGE data, Brazilian domestic consumption of cocoa products was **303,483 tonnes** in 2024.

Primary export destinations of Brazilian cocoa

According to USDA FAS Brasilia, primary export destinations for Brazilian cocoa products include **Argentina, the United States (US),** and the **Netherlands**, respectively with 45, 18, and 12 % share in 2024.

According to a sample of Brazilian shipment data between 1 January 2023 and 30 November 2023 analysed by AidEnvironment, Argentina is absent in the shipment records, and the top-3 Brazilian cocoa recipient countries are the **US (56% of all imports), Netherlands (36%),** and **Spain (7%).**

The majority of the shipments in the sample, originate from the **Brazilian ports** of Salvador (61%) and Santos (27%), followed by Ilhéus in Bahia (11%).

Brazilian cocoa imports and exports

Key stakeholders in the Brazilian cocoa industry

An estimated **93-95%** of cocoa purchasing and processing in Brazil is reportedly controlled by only a few companies represented by the Brazilian Association of Cocoa Processing Industries (**AIPC**), including **Barry Callebaut, Cargill, Olam Food Ingredients (Ofi)**, and **IBC** (Brazil's Cocoa and Food Industry). Typically, farmers sell their beans to intermediaries, who then supply grinding companies—often subsidiaries of these major international firms. AIPC estimates that the cocoa industry generates around **BRL 23 billion** (EUR 3.8 billion) per year in revenue for Brazil.

Barry Callebaut, Ofi, and Cargill are direct (Tier-1) cocoa suppliers to the largest global players in cocoa-based chocolate and confectionery: **Nestlé**, **Mars**, **Mondelēz**, **and Ferrero**, while being indirectly supplied through private cocoa producers, cooperatives and intermediary traders (Tier-2). Despite mentioning Brazil as a sourcing origin, Mars and Mondelēz do not disclose the names and locations of their Brazilian cocoa suppliers. Ferrero does not report any cocoa sourcing from Brazil, which means Nestlé appears to be the only company publicly disclosing its Brazilian cocoa suppliers.

A sample of Brazilian shipment data between 1 January 2023 and 30 November 2023 confirms **Cargill, Ofi,** and **Barry Callebaut** among the top-10 of largest exporters of Brazilian cocoa.

European importers of Brazilian cocoa

In the sample of Brazilian cocoa exports to only Europe in 2023, **Cargill** is the largest importer of Brazilian cocoa, in the form of cocoa powder (Figure 3 below). **Ofi** also imports Brazilian cocoa powder in Belgium. **Valrhona**, a French premium chocolate manufacturer, mainly imports cocoa beans, while all below listed importers from Spain and **Fanfani**, an Italian logistics company, import only in the form of chocolate.

Top-5 EU importing country	Key EU importing operators
Netherlands 82%	Cargill (66%), Unknown (32%), Valrhona (2%), Daarnhouwer (1%)
Spain 16%	CAP Imp (46%), Al Rimah (30%), Trans Mediterraneo (6%), Elias Waksman (5%), Afri Food Sarlu (4%)
Belgium 1%	Broekman Logistics (50%), Olam (35%), STL Logistics (15%)
France 1%	Valrhona (100%)
Italy <1%	Fanfani (100%)

Figure 3. Key European importers of Brazilian cocoa in 2023. Source: AidEnvironment, based on a sample of Brazilian export data, including all cocoa-related HS codes (1801 till 1806), between 1 January 2023 and 30 November 2023. The sample contains a large, unknown customer that imported 1,200 tonnes of cocoa beans from the Brazilian port Ilhéus in Bahia to the Netherlands in March 2023. This may distort the ranking of Dutch importers.

Cocoa industry assets in Brazil

Brazil cocoa cultivation and company assets maps

Major **cocoa industry infrastructure** can be found in Bahia and Pará, including cocoa plantations, warehouses, and milling factories. The maps below summarise cocoa infrastructure of several key cocoa trading and processing companies in Brazil (Figures 4 and 5).

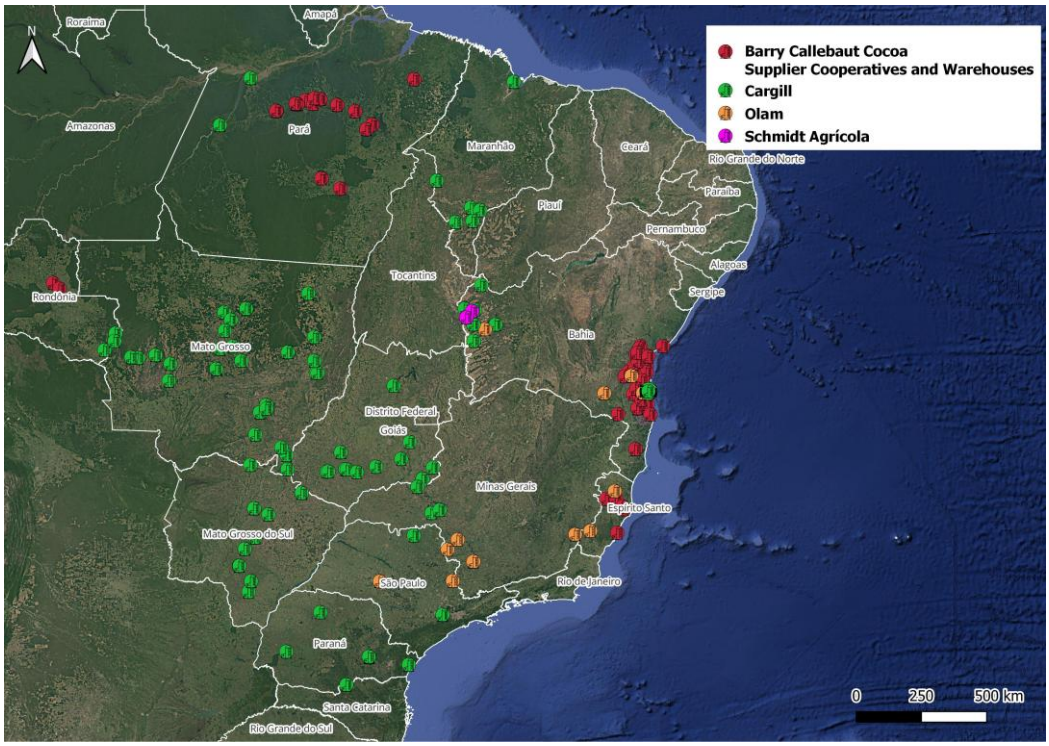


Figure 4. Cocoa warehouses and cooperative suppliers of key cocoa traders and processors in Brazil. Source: AidEnvironment, based on various sources including SICARM and company websites (e.g. Barry Callebaut). Note: the Olam Group and Cargill warehouses are also linked to other commodities (e.g. soy, coffee, cotton), especially if they are located outside Bahia and Pará states.

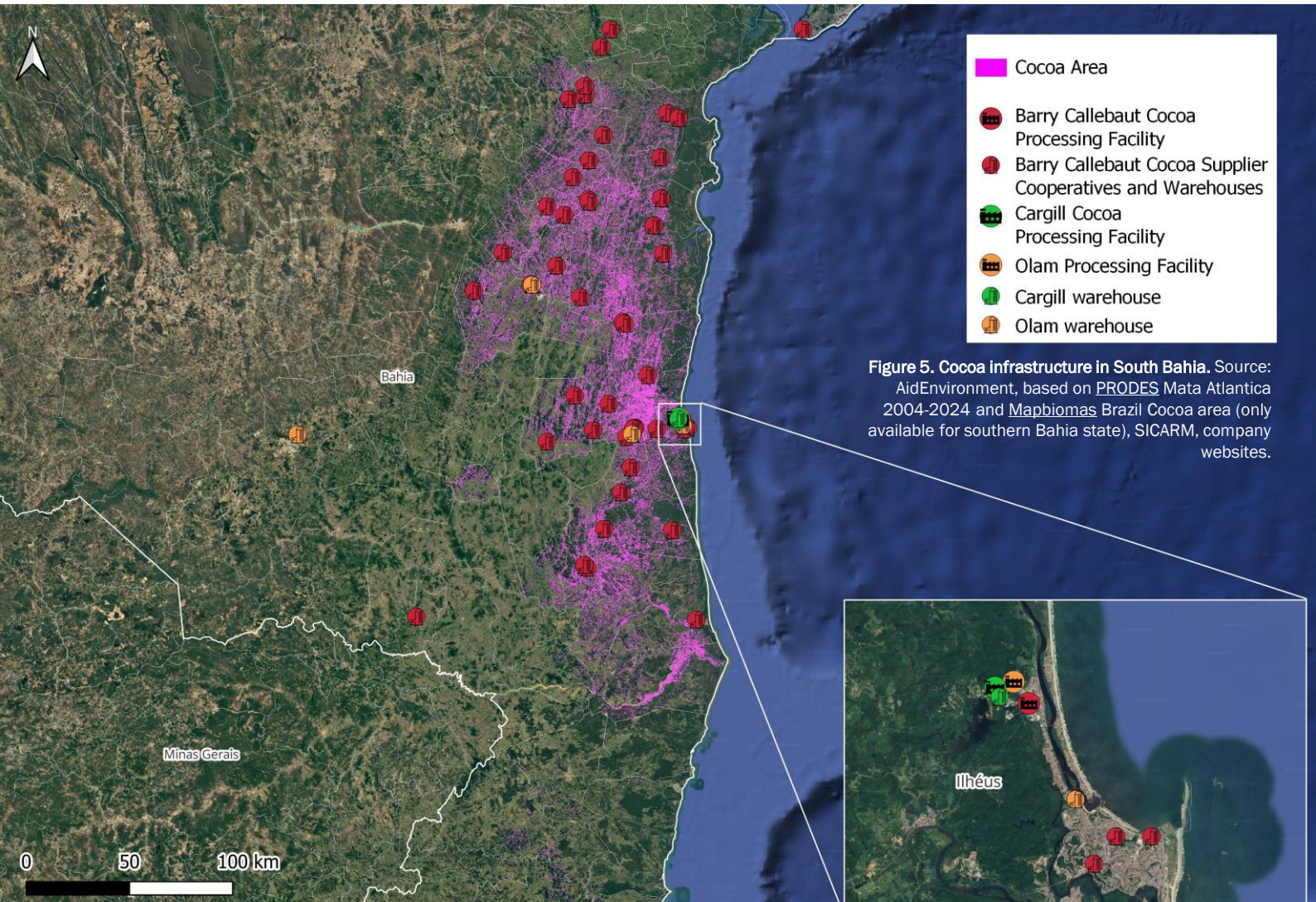


Figure 5. Cocoa infrastructure in South Bahia. Source: AidEnvironment, based on PRODES Mata Atlantica 2004-2024 and Mapbiomas Brazil Cocoa area (only available for southern Bahia state), SICARM, company websites.

Brazil cocoa case studies

Nine potentially noncompliant cocoa cases in Bahia and Pará and linked company responses

Cocoa growers in Brazil present cocoa as an important crop for forest protection and the restoration of degraded land. In the main producing states of Pará and Bahia, which span the Atlantic Forest, Amazon and Cerrado biomes, cocoa production appears to have a lower environmental impact than soy and beef. There also seems to be a clear strategy to expand cocoa cultivation on former pastureland. Nevertheless, AidEnvironment found cases of cocoa expansion linked to deforestation, fines and embargoes, invasion of indigenous territories, and exploitative labour conditions, including conditions analogous to slave labour.

This section covers **nine exemplary cases** (Table 4) of cocoa farms in Bahia and Pará that have either forest clearing since the EUDR cut-off date, or have potential legality issues, that might be noncompliant with the EUDR if the cocoa beans produced on the cleared plots would enter the EU market when the law enters effect from 31 December 2026, or with the CSDDD, which entered into force on July 25, 2024. The CSDDD forces large companies to identify, prevent, and mitigate adverse human rights and environmental impacts in their operations and global value chains, and at least large cocoa traders Barry Callebaut, Olam Group, and Cargill fall within the scope of the Directive. To the extent possible, AidEnvironment has connected these farms to various cocoa traders and (downstream) processors that might buy cocoa from these farms now and in the near future.

We have based our analysis on AidEnvironment's comprehensive datasets in Brazil, including data on native vegetation loss, alerts, cocoa infrastructure (e.g. warehouses), confirmed cocoa area (mainly in south-eastern Bahia), which we have crosslinked with details on farm ownership, legality issues, supply chain linkages, and social-environmental impacts.

The report's case studies were shared in May 2026 with selected cocoa producers, traders and processors— **Barry Callebaut, Ofi, Cargill, Schmidt Agrícola, CJ 2 Participações, and Santa Colomba Agropecuária**. Company responses have been reflected in the relevant case studies. Schmidt Agrícola and Santa Colomba Agropecuária did not respond.

The responses reveal marked differences in the apparent depth of company due diligence and follow-up. **Barry Callebaut** provided the most detailed response, indicating that it screened both direct and indirect cocoa suppliers and outlining case-specific mitigation measures. In three of the nine Brazilian cocoa cases, Barry Callebaut reported either supplier suspension or pending sourcing status. In one of them, Fazenda Gameleira — confirmed as a supplier to both Barry Callebaut and Cargill — Barry Callebaut stated that it had immediately suspended the farm after its own geospatial due diligence confirmed deforestation.

Cargill, by contrast, confirmed an active supplier-buyer relationship with Fazenda Gameleira but has not indicated that the farm has been suspended from its supply chain, despite a similar confirmed deforestation concern. As a result, cocoa linked to the cleared area may still enter downstream supply chains connected to Cargill customers, including Nestlé, Mars and Mondelēz. Cargill also did not appear to exclude possible indirect supply-chain links to the investigated cases.

Ofi stated that "*seven of the cocoa farms in Brazil [out of nine] have never been a direct supplier to ofi*," but did not identify the farms by name. While ofi noted that active suppliers must comply with its Agri Supplier Code, it remains unclear which two farms are directly linked to ofi, how ofi assessed the potential non-compliance identified, and whether indirect supply-chain links have been ruled out.

Together, the cases and company responses show uneven cocoa due diligence and mitigation, increasing the risk that cocoa linked to alleged social or environmental harms reaches downstream companies such as Nestlé, Mars and Mondelēz.

Cocoa case	Name property	Owner	Location in Brazil (municipality, state)	Page
1	Fazenda Colomba (Fazenda Karitel)	Santa Colomba Agropecuária	Cocos, Bahia	14
2	Fazenda Arco-Íris / Fazenda Zeferino	Lourildo Souza Pereira (till 2025); Luiz Henrique Gonsalves Rios (from 2026)	Itajuípe and Ilhéus, Bahia	17
3	Fazenda Santa Luzia	CJ 2 Participações (Manoel Leite Landmann) (supplier of Chocolat du Jour)	Ibirapitanga, Bahia	19
4	Fazenda Sombra da Tarde	Antônio Celestino dos Santos Maria Assuncão Dos Santos Baches Marcio Aparecido De Assis Oliveira	Medicilândia, Pará	21
5	Area between Schmidt properties Lote Agrícola N° 158E and N°162 E / Fazenda Itacolomy	Schmidt Agrícola / Schmidt Cacau BioBrasil Produção de Mudas Antônio Luís de Moraes Pedroza	Riachão das Neves, Bahia	23
6	Fazenda Fé em Deus	Adelson Costa da Cruz	São Félix do Xingu, Pará	27
7	PA Ressaca in Itatá Settlement Project	Roberto Rodrigues da Rocha	Senador José Porfírio, Pará	29
8	Fazenda Gameleira	Nelson Lauer Junior	Uruará, Pará	31
9	Chácara do Caçula	Genildo Gomes de Araújo	Medicilândia, Pará	33

Table 4. Overview of Brazilian cocoa case studies

SANTA COLOMBA

Fazenda Santa Colomba/Karitel

Location: Cocos (Bahia)

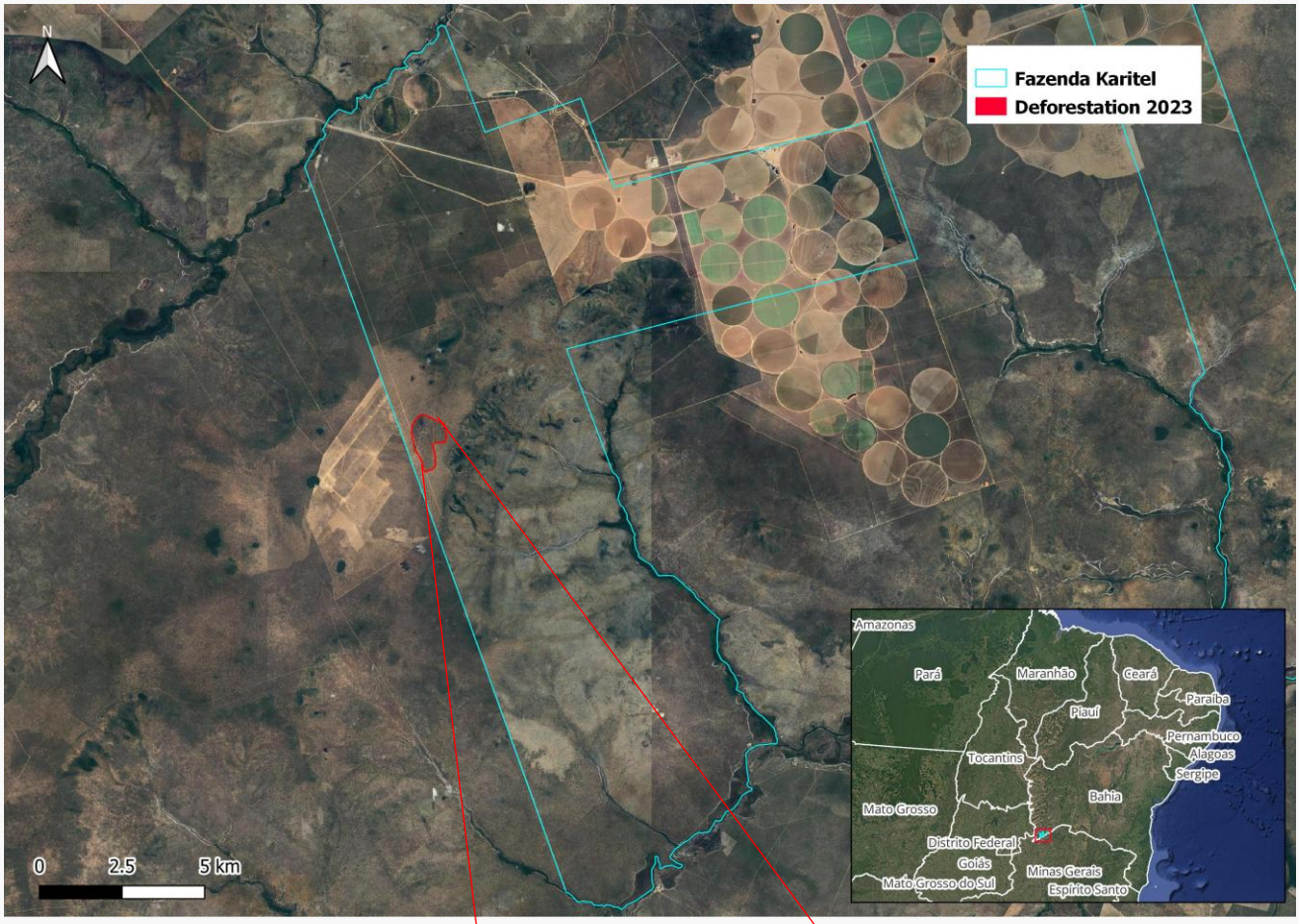
Biome: Cerrado (Brazil)

Size property (ha): 21,147

Coordinates property: -14.79083, -45.56092

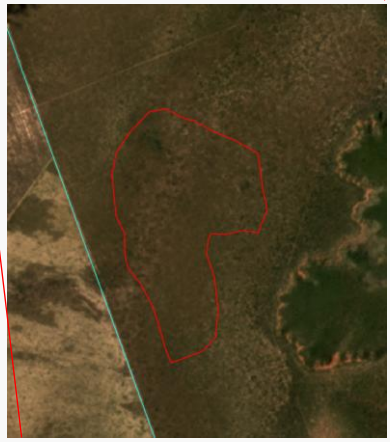
Cleared Area

114	hectares	**Period clearance:** January 2023 – February 2023	**Type of vegetation:** Forested Savanna
14,655	tons of CO_2		



Imagery: Location of Fazenda Colomba/Karitel (blue polygon) in Cocos (Bahia) with potential native vegetation clearance outside the production area. Note: While INPE Deter detected the clearing of 114 ha in 2023 within the boundaries of the farm, this was not confirmed by PRODES. The potential clearing seemingly occurred outside the farm's production area and does not cover forest vegetation according to the definition of the EUDR. After the clearing in 2023, the land was left untouched, and currently (May 2026) there is no agricultural activity. The vegetation has regrown. Source: AidEnvironment, based on SIGEF/SNCI, INPE Deter and PRODES.

January 2023



February 2023

Imagery bottom right: Fazenda Karitel outside production area, before and after potential clearing (red polygon). Source: AidEnvironment. Imagery ©2026 Planet Labs Inc.

SANTA COLOMBA

Fazenda Santa Colomba/Karitel

Ownership & Business relationship

Owner:

Santa Colomba Agropecuária

Company responses:

In response to nine Brazilian cocoa cases shared with key cocoa traders and Santa Colomba Agropecuária, **Cargill** stated (5 June 2026) that based on "*a review of supplier names, CARs and geolocation coordinates, in line with our Human Rights and Environmental Due Diligence Policy and against available internal cocoa supply chain information*", the company only identified a "*current cocoa sourcing relationship with Fazenda Gameleira*", denying any commercial cocoa linkages to the other eight cases, including this *farm. Cargill did however not rule out any indirect or historical cocoa supply chain linkages.* **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to ofi and how ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out.

*** Company responses continue at the next page ***

Environmental sanctions

Embargoes:	No	-
Environmental fines:	Yes	In November 2023, Karitel Farm was fined USD 36,830 (BRL 200,000) for failing to implement the "*necessary environmental protection measures in the construction and operation of canals and reservoirs for irrigated agriculture.*" In June 2024, an additional daily fine of USD 92 (BRL 500) was imposed for not resolving the issue. A third citation in September 2024 doubled the daily fine.

Case description

Fazenda Santa Colomba or Karitel (1) is owned by Santa Colomba Agropecuária group, a cocoa, grains, cotton, and tobacco producer in western Bahia (2). The farm may be at risk under the legality requirements of the EUDR and the CSDDD, linked to labour issues. On 7 November 2023, the farm was inspected by Brazil's Ministry of Labour after a worker reported being assaulted by outsourced guards (1). Auditors concluded that he had been subjected to conditions analogous to slavery due to degrading labour conditions and issued two infraction notices (1). After an appeal by the company, the acting Labour Minister took over ("avocou") the case, keeping Santa Colomba out of Brazil's Dirty List of slave-labour offenders until a ministerial decision was taken (3). In November 2025, the Labour Minister overturned the infraction notice for submitting the worker to conditions analogous to slavery (4). This is only the second time that a labor minister has overturned a notice of violation for slave labour (5).

In October 2023, inspectors from Bahia's Institute for the Environment and Water Resources (Inema) found animal bones and decomposing carcasses along the banks of the property's canals, which total around 40 km in length (6). The company received three fines – the last was registered in September 2024 (see above) for failing to adequately safeguard its irrigation canals, posing a risk to the wildlife surrounding Grande Sertão Veredas Park, a sanctuary for Cerrado species (6).

According to customs data accessed by Repórter Brasil, Santa Colomba supplied certified cotton in 2024 to a factory owned by Pakistan's Soorty Enterprises, which appears on H&M's supplier list. The same data also indicate that, in 2023, Santa Colomba Group supplied cotton to Crescent Textile Mills in Pakistan and to a unit of Kipas Holding in Turkey. Crescent is listed as a Ralph Lauren supplier, while Kipas Holding appears on PVH's supplier list, and another company of the group, Kipas Pazarlama Ve Ticaret A.S., is also listed by H&M (6). Santa Colomba's supply-chain links also include tobacco supply to Philip Morris and seed-multiplication areas for Syngenta Seeds and the Brazilian company Boa Safra (3) (6).

Case continues on the next page

(1) Labour inspection report (2023), online: https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/operacoes-2023/op-630-de-2024-santa-colomba-agropecuaria-ba.pdf, viewed in May 2026
(2) Company website, online: https://santacolomba.com.br/, viewed in May 2026.
(3) Repórter Brasil (2025), online: https://reporterbrasil.org.br/2025/10/empresa-que-driblou-lista-suja-fornece-para-philip-morris-e-syngenta, viewed in May 2026.
(4) Process decision P.A. n° 14152.016984/2024-05 (available upon request).
(5) Repórter Brasil (2025), online: https://reporterbrasil.org.br/2025/11/ministro-trabalho-anula-flagrante-trabalho-escravo/, viewed in May 2026.
(6) Repórter Brasil (2024), online: https://reporterbrasil.org.br/2024/10/animal-cemetery-found-phillip-morris-hm-factory-supplier, viewed in May 2026.

Fazenda Santa Colomba/Karitel

Ownership & Business relationship

Owner:

Santa Colomba Agropecuária

Company responses (continued):

Barry Callebaut confirmed (5 June 2026) this farm and producer are part of its Brazilian cocoa supply chain, pointing out that the cocoa area of the farm is registered as Bela Vista" (CAR: BA-2908101-B838D65902694BC69B995EB11A636837). A detailed geospatial analysis by the company on the whole polygon provided by AidEnvironment, reportedly did not reveal any deforestation in the cocoa supply area. Moreover, "*a field certification supervisor visited the property in 2025 and confirmed the occurrence of natural s, which aligns with the false-positive hypothesis for the minimal DETER alert and further negates the allegation of intentional land conversion."* On the environmental sanctions referenced in this case, Barry Callebaut asserts that its "*due diligence process has demonstrated that the supplier has complied with the requirements set forth by the competent authority and is currently compliant with local legal requirements on this matter*." Finally, the company responds on the social and labour allegations by pointing out that "*the incident [a worker's assault by outsourced guards, ed.], while severe, was an isolated case by security personnel*", and that "*investigations corroborated that the property's standard operating practices do not constitute modern slavery. Consequently, as noted in AidEnvironment's own report, the acting Labor Minister officially overturned the infraction notice for forced labour in November 2025*." Years of documenting social and environmental violations in commodity cases developed by AidEnvironment have however revealed that violence and threats by security staff towards labourers and IPLC are widespread and structural in Brazil, contrary to isolated cases. Barry Callebaut's full response can be found here.

Santa Colomba Agropecuária, the company investigated in this case study, did not reply to requests for review in May 2026.

Environmental sanctions

Embargoes:	No	-
Environmental fines:	Yes	In November 2023, Karitel Farm was fined USD 36,830 (BRL 200,000) for failing to implement the "*necessary environmental protection measures in the construction and operation of canals and reservoirs for irrigated agriculture*." In June 2024, an additional daily fine of USD 92 (BRL 500) was imposed for not resolving the issue. A third citation in September 2024 doubled the daily fine.

Case description

A Reuters article published in April 2025 also reported that Fazenda Santa Colomba was negotiating a partnership with Swiss chocolate producer Barry Callebaut to establish a 5,000- to 7,000-hectare cultivation area on the property (7). The farm is therefore part of the total estimated 75,000 hectares of planned irrigated cocoa fields in northeastern Brazil - backed by Cargill, Barry Callebaut, and Swiss investment firm NewAg Partners, that may be cut by half due to the 2026 cocoa price collapse (8). It is unclear to date (May 2026) if this partnership will continue. At least Barry Callebaut confirmed in June 2026 that the company is still sourcing cocoa from this farm (see response above). Also, Ofi may source from this farm (see response previous page), as two out of nine cocoa farms in Brazil shared in a draft report with Ofi, have or have been reportedly a direct supplier to Ofi. Finally, although Cargill indicates it is currently only actively sourcing cocoa from one of the other farms out of nine cocoa cases, the company did not rule out any historical or indirect supply chain relationship with Fazenda Santa Colomba/Karitel.

With an estimated 93-95% of cocoa purchasing and processing in Brazil reportedly controlled by only a few companies represented by the Brazilian Association of Cocoa Processing Industries, including Barry Callebaut, Cargill, Ofi, and Brazil's Cocoa and Food Industry (9), these cocoa traders, that are often also the major cocoa importers in Europe, may not be able to achieve negligible risk in their due diligence efforts under the EUDR when buying cocoa beans from Brazil, and potentially from this farm. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (10). Since Brazil is a net importer of cocoa products, most cocoa will probably stay in Brazil, likely involving less deforestation compliance risk under the EUDR. Nevertheless, labour violations may also be considered a risk under the legality requirements of the EUDR, or the CSDDD, with Barry Callebaut, Olam, and Cargill falling within the scope of the Directive (11).

(7) Reuters (2025), online: https://www.reuters.com/markets/commodities/brazils-would-be-cocoa-king-aims-revolutionize-industry-with-giant-farm-2025-04-22, viewed in May 2026.
(8) Reuters (2026), online: https://www.reuters.com/business/environment/brazils-dreams-industrial-scale-cocoa-farms-fading-after-price-crash-2026-03-12/, viewed in May 2026.
(9) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(10) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.
(11) SOMO CSDDD datahub, online: https://www.somo.nl/csddd-datahub/ - look-for-company, viewed in May 2026.

Fazenda Arco-Íris / Fazenda Zeferino

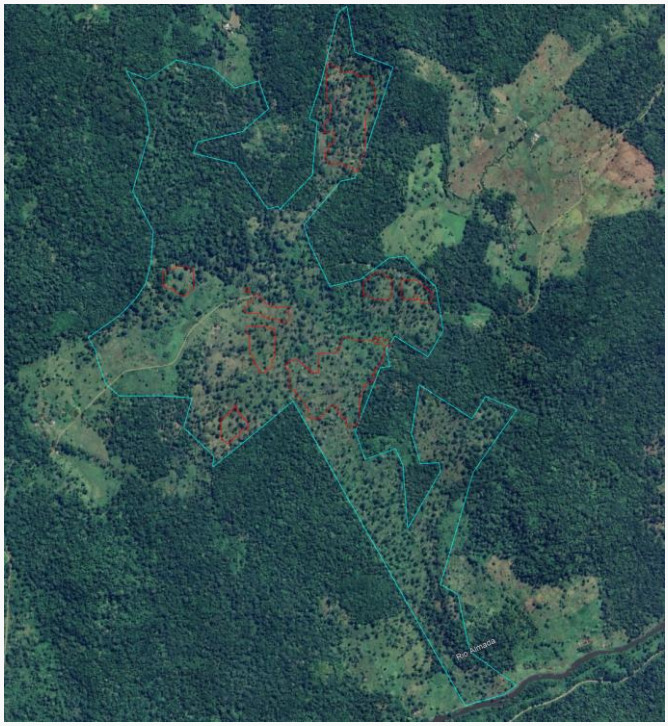
Location: Itajuípe and Ilhéus (Bahia)
Biome: Mata Atlântica (Brazil)
Size property (ha): 308
Coordinates property: -14.64491, -39.37943

Cleared Area

44	hectares	**Period clearance:** August 2022 – July 2023	**Type of vegetation:** Dense Ombrophylous forest
10,191	tons of CO_2		

June 2020

June 2024



Imagery: Fazenda Arco-Íris / Fazenda Zeferino (blue polygon) before and after clearing (red polygon). Source: AidEnvironment, based on PRODES Mata Atlântica 2004-2024, SIGEF/SNCI. Imagery ©2026 Airbus.

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

Fazenda Arco-Íris / Fazenda Zeferino

Ownership & Business relationship

Owner:

Lourildo Souza Pereira (till 2025)

Luiz Henrique Gonsalves Rios (from 2026)

Company responses:

In response to nine Brazilian cocoa cases shared with key cocoa traders, **Cargill** stated (5 June 2026) that based on "*a review of supplier names, CARs and geolocation coordinates, in line with our Human Rights and Environmental Due Diligence Policy and against available internal cocoa supply chain information*", the company only identified a "*current cocoa sourcing relationship with Fazenda Gameleira*", denying any commercial cocoa linkages to the other eight cases, including this farm. Cargill did however not rule out any indirect or historical cocoa supply chain linkages. **Olam Food Ingredients** (Ofi) stated (9 June 2026) that "seven of the cocoa farms in Brazil [out of nine, *ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out. **Barry Callebaut** stated (5 June 2026) for Fazenda Arco-Íris/Zeferino that "*internal traceability confirms no direct or indirect commercial relationship. We nonetheless reviewed the assessments provided by AidEnvironment, and where confirmed take notice of the findings.*"

Environmental sanctions

Embargoes:	No	-
Environmental fines:	No	-

Case description

Fazenda Arco-Íris (currently registered as Fazenda Zeferino, see below) has cleared 44 hectares of dense ombrophylous forest between August 2022 and July 2023, of which 43 ha falls in the FAO Forest definition and may therefore be non-compliant with the EUDR (1). The farm boundaries fall within confirmed cocoa cultivation area in the Brazilian state Bahia (2; 3).

However, ownership of this property, that is registered under two different municipalities Itajuípe and Ilhéus in Bahia, has changed in 2026. According to official rural cadaster system (SIGEF) data, until 2025 the farm was under ownership of Lourildo Souza Pereira, which also includes the period of deforestation (2022-2023). Lourildo Pereira is an ophthalmologist and an honorary citizen of Teixeira de Freitas, Bahia (4).

From 2026, ownership is officially registered under Luiz Henrique Gonsalves Rios and his farm Fazenda Zeferino (5). The current reported activity in the farm is raising cattle (6), and the owner possesses at least 11 cattle properties. Fazenda Zeferino directly supplied 80 bovine animals to Fazenda Pinguim in July 2024 (7). In turn, Fazenda Pinguim is an indirect supplier, via Fazenda Boa Sorte, to JBS Friboi's slaughterhouse in Itapetinga (Bahia). Since all mentioned farms are linked to the same owner, Luiz Henrique Gonsalves Rios, he is likely moving cattle between his farms, potentially to mask deforestation in certain farms.

In 2005, a farm with the same name in the same municipality (Fazenda Arco-Íris) was declared for agrarian reform (8). In 2017, 30 landless families were evicted from Fazenda Arco Íris (9). Reportedly, over ten years, "*the families suffered several evictions, requested by the owner Lourildo Pereira. However, the farm was reoccupied, in view of the complaints of unproductivity made by the MST (Landless Workers' Movement). "Free Homeland," one of the Movement's main rallying cries, used to propel the struggle in defence of Agrarian Reform and reaffirm the desire for a sovereign society, was chosen to name the pre-settlement*". A 2018 court decision in the court case 8000598-72.2016.8.05.0119 however stated that the area had been declared not subject to agrarian reform and granted Lourildo repossession (10).

Key cocoa purchasing and processing companies in Brazil, largely controlled by Barry Callebaut, Cargill, Ofi (11), may not be able to achieve negligible risk in their due diligence efforts under the EUDR when buying cocoa beans from Brazil, and potentially from this farm. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (12). The farm is located only slightly over 50 KM from the major cocoa processing facilities of these traders in Ilhéus (Bahia). Since Brazil is a net importer of cocoa products, most cocoa will probably stay in Brazil, likely involving less deforestation compliance risk under the EUDR. Nevertheless, land evictions may also be considered a risk under the legality requirements of the EUDR, or the CSDDD, with Barry Callebaut, Olam, and Cargill falling within the scope of the Directive (13). Also, no authorization for deforestation at Fazenda Arco-Íris was identified, which may suggest that the deforestation took place illegally under Brazilian legislation.

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(2) Confirmed cocoa planted area (undisclosed source).
(3) Mapbiomas cocoa, online: https://brasil.mapbiomas.org/en/mapbiomas-cacau, viewed in May 2026.
(4) Fiscal number: 32.690.299/0001-40 / https://www.doctoralia.com.br/clinicas/clinol / https://www.camaratf.ba.gov.br/wp-content/uploads/2022/07/RESOLUCAO-No-178.2016-CONCEDE-O-TITULO-DE-CIDADAO-HONORARIO-AO-SR.-LOURILDO-SOUZA-PEREIRA.pdf, viewed in May 2026.
(5) Rural Register, online: https://www.registrorural.com.br/imoveis/car-BA-2915502-627C5139A6DC40BC927E71F039080CB2/fazenda-zeferino-em-itajuipe-ba, viewed in May 2026.
(6) File requerimento_fazenda zeferino (available upon request).
(7) Cattle transfer data (GTA).
(8) Online: https://www.planalto.gov.br/ccivil_03/_ato2004-2006/2005/dnn/dnn10519.htm, viewed in May 2026.
(9) Online: https://mst.org.br/2017/03/20/familias-sao-despejadas-apos-dez-anos-de-moradia-em-pre-assentamento, viewed in May 2026.
(10) File 'decisao_arcoiris' (number 8000598-72.2016.8.05.0119) (available upon request).
(11) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(12) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.
(13) SOMO CSDDD datahub, online: https://www.somo.nl/csddd-datahub/ - look-for-company, viewed in May 2026.

Fazenda Santa Luzia

Location: Ibirapitanga (Bahia)
Biome: Mata Atlântica (Brazil)
Size property (ha): 173
Coordinates property: -13.98515, -39.47789

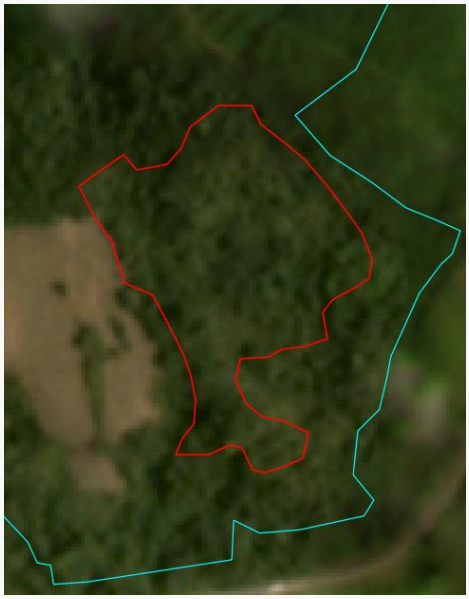
Cleared Area

7.35	hectares	**Period clearance:** February to September 2021	**Type of vegetation:** Dense Ombrophylous forest
1,702	tons of CO_2		

Imagery: Google Maps Screenshot of the location of Fazenda Santa Luzia (blue polygon) in Ibirapitanga (Bahia), with indicated deforestation area (red polygon). Source: SIGEF/SNCI, Mapbiomas Alerta, Google Maps, coordinates: -13.98515, -39.47789 (Imagery @2026 Airbus).

About 2.5 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

February 2021



September 2021

Source: ©2026 Planet Labs Inc.

Fazenda Santa Luzia

Ownership & Business relationship

Owner:
CJ 2 Participações (director: Manoel Leite Landmann)

CAR: BA-2912707-3B331D4613A249A6ADD1DD2B7658ABBB

Company responses:
In response to nine Brazilian cocoa cases shared with key cocoa traders and CJ 2 Participações, **Cargill** stated on 5 June 2026 that it has no active and current commercial cocoa link to this case. Cargill did however not rule out any indirect or historical cocoa supply chain linkage to the farm, for instance at the time of clearing in 2021. **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out. **Barry Callebaut** stated (5 June 2026) for Fazenda Santa Luzia and Fazenda Fé em Deus: "*Barry Callebaut acknowledges historical, limited commercial activity. In both cases, deliveries were discontinued. Given the duration of this disengagement (over three years in both cases), we do not consider these cases to present risk of non-compliance with regards to internal policies or applicable legal frameworks*." **CJ 2 Participações**, owner of Fazenda Santa Luzia, stated (2 June 2026) that Chocolat du Jour is a separate legal entity with no responsibility for the farm, and that the area cited was previously pasture. The company's full response can be found here. AidEnvironment maintains that linking Chocolat du Jour to Fazenda Santa Luzia is justified by apparent shared Landmann family ownership, Chocolat du Jour's own "our farm" reference and photo of Fazenda Santa Luzia on their website, and several sources indicating that Santa Luzia cocoa is used in Chocolat du Jour products.

Environmental sanctions

Embargoes:	No	-
Environmental fines:	No	-

Case description

Fazenda Santa Luzia's Rural Environmental Registry (CAR) was registered by Manoel Leite Landmann (1), director and legal representative of CJ 2 Participações LTDA (2). Manoel Landmann and its sister Patricia Landmann Fernandes own Chocolat du Jour, a fine chocolate producer based in São Paulo (3). News reports show that the cocoa produced at Fazenda Santa Luzia is used in Chocolat du Jour's production (4, 5). Reportedly, the farm has:

"*45 hectares dedicated to cacao cultivation—35 in an agroforestry system with cacao and açaí, and ten in a cabruca system, where cacao is grown in the shade of native vegetation. The farm currently produces 45 tonnes of cacao per year, 40% of which is fine cacao. The goal, Landmann says, is to double production by 2027, reaching 90 tonnes annually, with 70% classified as fine cacao*" (5).

The Bahia State Public Prosecutor's Office is investigating the deforestation of 7.54 ha of Atlantic Forest vegetation at Fazenda Santa Luzia. The investigation is scheduled to be completed by November 2026 (6, 7). According to CJ 2 Participações, "*the prior land use of the area referenced in the report, previously classified as pasture, is currently under clarification before the Ministério Público do Estado da Bahia. Upon becoming aware of the inquiry, Fazenda Santa Luzia presented itself to the authorities and remains available to provide any necessary clarifications*" (8). While no conclusion has yet been made, AidEnvironment could confirm 7.35 hectares of clearing in the farm between February and September 2021, based on satellite imagery and Mapbiomas Alerta (9). No authorization for deforestation at Fazenda Santa Luzia was identified, which may suggest that the deforestation took place illegally under Brazilian legislation. The farm boundaries fall within confirmed cocoa cultivation area in the Brazilian state Bahia (10,11).

About 2.5 ha of the clearing overlaps with forest vegetation as defined by the EUDR/FAO (12) and may therefore violate EUDR requirements. Key cocoa purchasing and processing companies in Brazil, largely controlled by Barry Callebaut, Cargill, Ofi, and Brazil's Cocoa and Food Industry (13), likely buy cocoa from this farm. News outlet Veja São Paulo reports in 2024 that "*the farm [Fazenda Santa Luzia, ed.] yields 15 tons of fine cocoa, enough to supply its own production line and still generate a surplus for sales to companies like Callebaut and Cargill*" (14).

This case exemplifies that these cocoa traders and processors require thorough due diligence protocols and checks, even if farms such as Fazenda Santa Luzia reportedly "*utilize sustainable practices*" (5). The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (15).

(1) Rural Registry, online: https://www.registrorural.com.br/car/item/BA-2912707-3B331D4613A249A6ADD1DD2B7658ABBB, viewed in May 2026.
(2) Fiscal number: 08.933.523/0001-00 (available upon request).
(3) Fiscal number: 57.762.072/0001-93. Online: https://www.estadao.com.br/paladar/na-mesa-com-fred/chocolat-du-jour-completa-38-anos-de-tradicao-e-controle-total-da-cadeira/?srsltid=AfmBOoo5VJnVlc-j6KKordvNPCOkwKWDM6Sq79IkEzxs86iDsk64S-oX, viewed in May 2026.
(4) Bloomberg (2026), online: https://www.bloomberglinea.com.br/negocios/herdeiros-de-marca-de-chocolate-fino-investiram-em-cacau-proprio-agora-miram-expansao, viewed in May 2026
(5) Valor (2025), online: https://valor.globo.com/empresas/media-e-mais/artigo/chocolat-du-jour-agora-so-usa-cacau-proprio-e-mira-dobrar-colheita-ate-2027.ghtml, viewed in May 2026.
(6) Case file, online: https://www.mpba.mp.br/sites/default/files/biblioteca/diariojustica/20260115.pdf, viewed in May 2026;
(7) File 'inquerito CJ2 Santa Luzia' (available upon request).
(8) Company response of CJ 2 Participações, 2 June 2026, online: https://aidenvironment.org/wp-content/uploads/2026/06/Response-CJ2-Participacoes-2-June-2026.pdf
(9) Mapbiomas Alerta, online: http://alerta.mapbiomas.org/, viewed in May 2026.
(10) Confirmed cocoa planted area (undisclosed source).
(11) Mapbiomas cocoa, online: https://brasil.mapbiomas.org/en/mapbiomas-cacau, viewed in May 2026.
(12) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(13) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(14) Veja São Paulo, online: https://vejasp.abril.com.br/coluna/arnaldo-lorencato/comer-e-beber-chocolate-cacau-nacional/, viewed in May 2026.
(15) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.

Fazenda Sombra da Tarde

Location: Medicilândia (Pará)
Biome: Amazon (Brazil)
Size property (ha): 430
Coordinates property: -3.57268, -53.02974

Cleared Area

80	hectares	**Period clearance:** October 2021 – October 2024	**Type of vegetation:** Submontane Dense Humid Forest
45,467	tons of CO_2		

October 2021

October 2024

Imagery: Fazenda Sombra da Tarde (blue polygon), before and after clearing (red polygon). Source: AidEnvironment, based on PRODES Mata Atlântica 2004-2024. Imagery ©2026 Planet Labs Inc.

About 54 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

Fazenda Sombra da Tarde

Ownership & Business relationship

Owner:
Antônio Celestino dos Santos (2010)

Maria Assuncão Dos Santos Baches (2025)

Marcio Aparecido De Assis Oliveira (Sítio Canta Galo:
CAR: PA-1504455-F80108D2A3CE426F8547CC5093535C99

Company responses:

In response to an earlier version of this case **Cargill** responded on 6 December 2024: "*We can confirm that the Sítio Sombra da Tarde Farm, owned by Antonio Celestino dos Santos and Maria Assunção dos Santos Baches, does not have, and has never had, commercial cocoa negotiations with Cargill*".

Barry Callebaut stated (5 June 2026) for Fazenda Sombra da Tarde that "*internal traceability confirms no direct or indirect commercial relationship. We nonetheless reviewed the assessments provided by AidEnvironment, and where confirmed take notice of the findings.*"

Olam Food Ingredients (Ofi) stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out.

Environmental sanctions

Embargoes:	No	-
Environmental fines:	No	-

Case description

In June 2011, a labour inspection at Fazenda Sombra da Tarde, in Medicilândia, Pará, identified 42 workers harvesting cocoa under conditions analogous to slavery, including three minors, two of whom were under 16 years old (1). The workers were housed in makeshift shelters made of tarpaulin and straw, as well as inadequately built wooden shacks, with no drinking water, sanitation or electricity and exposed to venomous animals and risks resulting from the improper use of pesticides (1). The farm's owner, Antônio Celestino dos Santos, was fined for labour irregularities and was later prosecuted by the Federal Public Prosecutor's Office for the crime (2). In August 2025, the court ruled that the case was time-barred due to the long period of time that had passed since the inspection (3). Another Rural Environmental Registry (CAR) corresponding to Fazenda Sombra da Tarde geographic coordinates is registered under the name of Sítio Canta Galo, registered by Marcio Aparecido De Assis Oliveira (4). Seemingly, overlapping land claims exist on the property (see also ownership section above).

Other than these serious allegations of labour violations in Fazenda Sombra da Tarde, AidEnvironment detected deforestation of 80 hectares of Submontane Dense Humid Forest in the farm between 2021-2024, of which more than half (54 ha) can be classified as forests under the EUDR (5). The cleared area falls in the property's declared Legal Reserves, presumably an area to be conserved with native vegetation (6). Moreover, no authorization for deforestation at Fazenda Sombra da Tarde was identified, which may suggest that the deforestation took place illegally under Brazilian legislation.

According to the Labour Prosecutor's Office (MPT), Fazenda Sombra da Tarde formed part of supply chains of cocoa industries, and specifically referred to Barry Callebaut, Cargill, and Ofi (7). In response to an earlier version of this case, Cargill responded on 6 December 2024: "*We can confirm that the Sítio Sombra da Tarde Farm, owned by Antonio Celestino dos Santos and Maria Assunção dos Santos Baches, does not have, and has never had, commercial cocoa negotiations with Cargill*" (8).

Apart from Cargill, also other key cocoa buyers and processors in Brazil, including Barry Callebaut and Olam (9)— may struggle to demonstrate negligible deforestation and legality risk under relevant legislation including the Brazilian Forest Code, EUDR, or CSDDD when sourcing and processing cocoa from Brazil, potentially from this farm. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (10).

(1) Ministry of Labor and Employment Inspection report (updated 6 November 2025), online (anonymized): https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/operacoe-2010/op-32-de-2010-faz-sombra-da-tarde-a-c-s-pa-1.pdf/view, viewed in May 2026.
(2) File 'Denúncia' available upon request.
(3) File 'Prescrição' available upon request.
(4) Rural Registry, online: https://www.registrorural.com.br/imoveis/car-PA-1504455-F80108D2A3CE426F8547CC5093535C99/sitio-canta-galo-em-medicilandia-pa, viewed in May 2026.
(5) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(6) MapBiomas Alerta, online: https://plataforma.alerta.mapbiomas.org/, viewed in May 2026.
(7) MPT case file (pp. 16 and 61-64). Available upon request.
(8) Compliance Checker Cargill profile, online: https://aidenvironment.org/wp-content/uploads/2024/12/ECF-3-Cargill-company-profile-2024-2.pdf, viewed in May 2026.
(9) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(10) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.

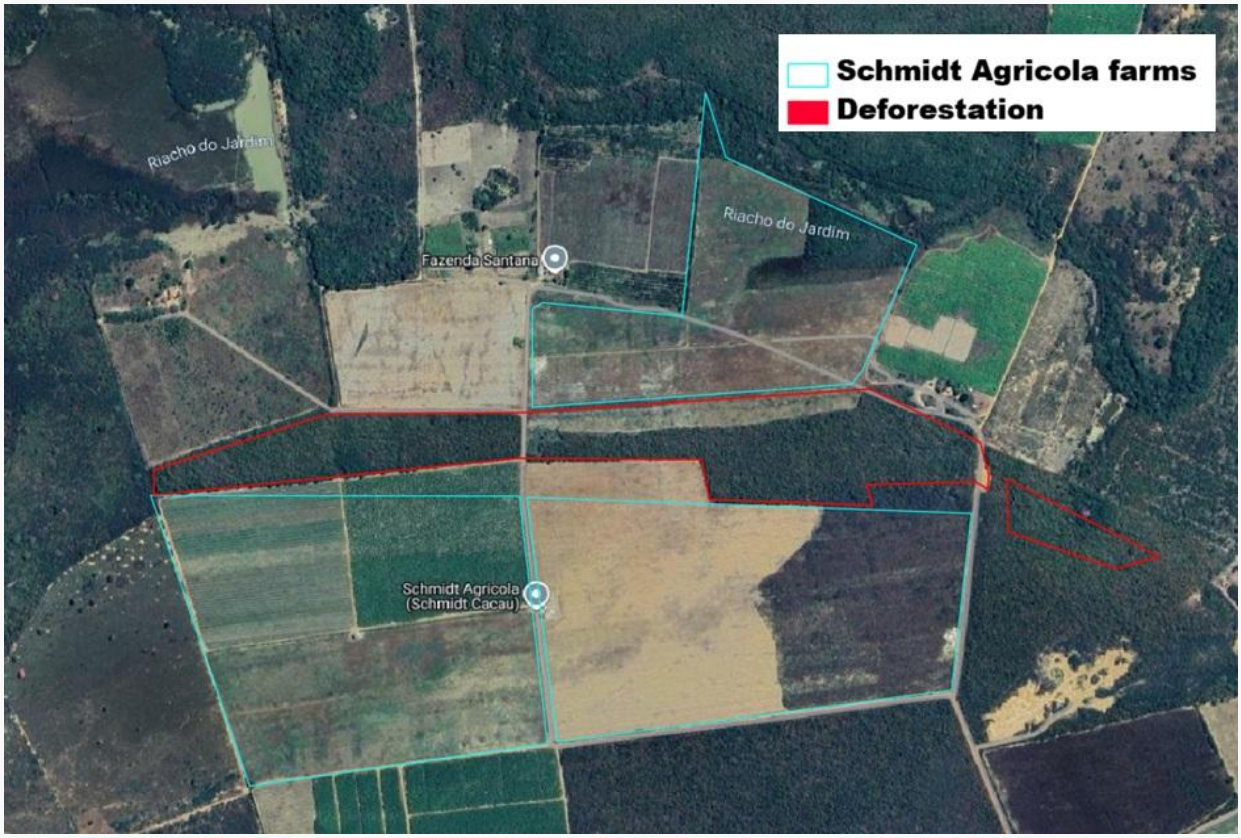
Area between Schmidt properties Lote Agrícola Nº 158E and Nº162 E

Location: Riachão das Neves (Bahia) **Biome:** Cerrado (Brazil)

Size property (ha): 210* **Coordinates property:** -11.74692, -44.76288

Cleared Area

27	hectares	**Period clearance:** August 2023 – July 2024	**Type of vegetation:** Wooded Savanna
1,191	tons of CO_2		



Imagery: Deforestation (red polygons) potentially overlaps with the operational or expansion area of Schmidt Agrícola (Schmidt Cacau) in Riachão das Neves (Bahia). Source: AidEnvironment, based on PRODES, CAR, Google Maps.

Notes: Although the clearing falls within a CAR registered to Projeto de Irrigação Nupeba (a public irrigation project), the imagery suggests it may be linked to Schmidt Cacau operations or expansion, bordering three properties owned by Schmidt Agrícola (see also next page). Two are registered as Lote Agrícola Nº 158E (CARs: BA-2926202-A84F2DBFBC2C4D2C89047D89702EFD47; BA-2926202-C319785D11AF41879626EA74D6EC9E27) and one as Lote Agrícola Nº162 E (CAR: BA-2926202 83755918292D4BCCADF80D9D8DB07586). *The reported property size (210 ha) includes all three Schmidt farms and the deforested area.

April 2022

April 2026

Source: ©2026 Planet Labs Inc.

21 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

Fazenda Itacolomy

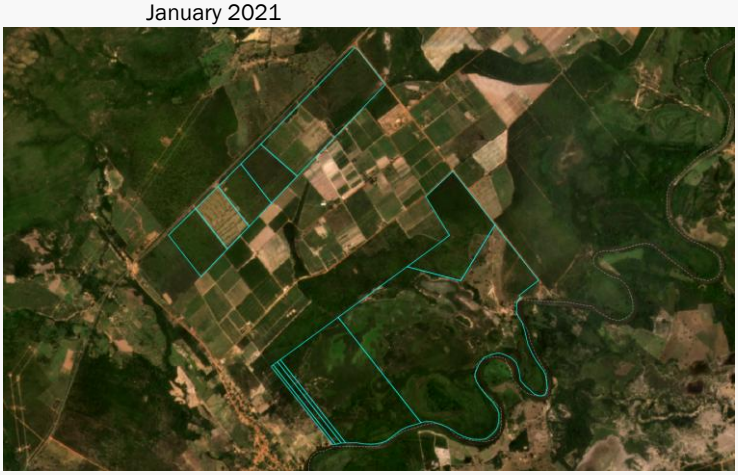
Location: Riachão das Neves (Bahia) **Biome:** Cerrado (Brazil)

Size property (ha): 640 **Coordinates property:** -11.90954, -44.87596

Cleared Area

140	hectares	**Period clearance:** January 2021 – October 2025	**Type of vegetation:** Forested Savanna
17,997	tons of CO_2		

January 2021



Oct 2025

Imagery: Fazenda Itacolomy properties (blue polygons) in Riachão das Neves before and after clearing (red polygons). Source: AidEnvironment, based on PRODES, SIGEF. Imagery ©2026 Planet Labs Inc. Notes: MapBiomas Alerta does not cover these alerts detected by PRODES. All blue polygons of the Fazenda Itacolomy parcels, adjacent to the BioBrasil nursery (see below) are registered under the name of Antônio Luís de Moraes Pedroza, according to SIGEF 2026 rural cadastre data.

48 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

Imagery: Location and entrance of the BioBrasil Produção de Mudas nursery (owned by Schmidt brothers David, Tobias and Moisés) in Riachão das Neves, clearly indicating the relationship between Schmidt Agrícola and Biobrasil. Source: Google Street View, coordinates: -11.91342081430151, -44.880271735957116. Imagery @2026 Google (image capture Dec 2024).

Schmidt Agrícola cocoa case

Ownership & Business relationship

Owners:
Schmidt Agrícola / Schmidt Cacau

BioBrasil Produção de Mudas

Antônio Luís de Moraes Pedroza (Fazenda Itacolomy)

Company responses:

In response to nine Brazilian cocoa cases shared with key cocoa traders and Schmidt Agrícola, **Cargill** stated on 5 June 2026 that it has no active commercial cocoa link to this case, contrary to the suggested linkages between Cargill and Schmidt Cacau indicated in the case investigation references. Following up on the case, Cargill responded on 16 June 2026 that the company "*does have an existing relationship with Schmidt Agricultural Group related to cocoa **development** in Brazil. Based on information currently available to us, the Schmidt-related areas questioned in your report are not part of our joint development project, and Cargill is not currently sourcing cocoa from those areas.*" **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out. **Barry Callebaut** stated (5 June 2026) for the Schmidt Agrícola properties that "*internal traceability confirms no direct or indirect commercial relationship. We nonetheless reviewed the assessments provided by AidEnvironment, and where confirmed take notice of the findings.*"

Environmental sanctions

Embargoes:	No	-
Environmental fines:	No	-

Case description (1/2)

Moisés Schmidt, co-owner of Schmidt Agrícola, known as the "King of Cocoa", and one of Brazil's largest cocoa producers, planned a USD 300 million project to cultivate 10,000 ha of (monoculture) cocoa in Riachão das Neves in Bahia, Brazil (1). The initial phase of cultivation of high-yield cocoa trees in the open sun, fully irrigated and fertilized, has reportedly already started on about 400 ha in partnership with Cargill (1). The business relationship between the two companies is reflected in a field visit to Moisés Schmidt's cocoa plantations by Cargill's CEO and Board Chair Brian Sikes (2). In response to the cocoa price collapse in early 2026, Schmidt declined to comment on what the cocoa price collapse means for his own plans but stated that "if the market remains below $5,000 per ton, more than 50% of the projects [cocoa investment projects in Bahia, *ed.*] are gone" (3).

Schmidt Agrícola's family business consists of four brothers (Moisés, Paulo, Tobias, and David Marcelino) and produces soy, cotton, corn, bananas and beans (4), and since 2019 started its preparations to cultivate cocoa, under its Schmidt Cacau Ltda company. The company also operates a nursery installation under the name of BioBrasil Produção de Mudas, reportedly using "*propagation machinery from Denmark's forestry equipment maker Ellepot with capacity to produce 10 million seedlings per year*". The nursery produces "*the trees for the planned giant farm and also sells seedlings to other cocoa projects in Brazil*" (1).

The Schmidt cocoa project is one of the businesses linked to the "Projeto De Irrigação Nupeba", a public irrigation project (5), owned by the state of Bahia (6). The clearing of 27 hectares of native vegetation between 2023-2024, of which 21 ha would fall within the EUDR definition of forest, adjacent to the Schmidt Cacau location (see first page of this case), falls within rural environmental registry (CAR) number: BA-2926202-6C128855892B46F4A41ABA8656AB43BE. The registry belongs to the enormous area (1,175 ha) registered under the Nupeba public irrigation project (7), where one of the Schmidt brothers, David Marcelino Almeida Schmidt, is member of the Project's Board of Directors (8). Remote sensing (see first page of this case) demonstrates that the clearing seems to fall within the indicated operational area of Schmidt Agrícola (Schmidt Cacau) and is bordering three properties operated by Schmidt Cacau and owned by Schmidt Agrícola, according to a rural property loan agreement valid until July 2027 (9). It is unclear whether authorization was provided for the clearing. In February 2026, Schmidt Cacau obtained a Special Licensing Authorization from the Bahia Institute of the Environment to carry out irrigated agricultural activities on an 82.8-hectare area comprising Agricultural Lots 158E and 159E. The authorization, however, does not permit vegetation clearing or the use of water resources (10).

*** Case continues on next page **

(1) Reuters (22 April 2025), online: https://www.reuters.com/markets/commodities/brazils-would-be-cocoa-king-aims-revolutionize-industry-with-giant-farm-2025-04-22/, viewed in May 2026.
(2) Instagram, online: https://www.instagram.com/reel/DL0F3ZdObRp, viewed in May 2026.
(3) Reuters (12 March 2026), online: https://www.reuters.com/business/environment/brazils-dreams-industrial-scale-cocoa-farms-fading-after-price-crash-2026-03-12/, viewed in May 2026.
(4) Schmidt Agrícola company website, online: https://schmidtagricola.com.br/produtos.php, viewed in May 2026.
(5) Nupeba project, online: https://www.codevasf.gov.br/assuntos/agricultura-irrigada/projetos-de-irrigacao/em-producao/nupeba; Facebook, online: https://www.facebook.com/Codevasf/posts/o-projeto-de-irrigacao-nupeba-em-riachao-das-neves-bahia-promove-a-diversificacao/576036664651048; https://www.codevasf.gov.br/assuntos/agricultura-irrigada/projetos-de-irrigacao/bip/30a-edicao/cacau-do-cerrado-um-produto-diferenciado-para-agregacao-de-valor, viewed in May 2026.
(6) DNR, online: https://dnr.org.br/, viewed in May 2026.
(7) Registro Rural CAR record (available upon request).
(8) DNR, online: https://dnr.org.br/conselho-de-administracao, viewed in May 2026.
(9) Sistema Estadual de Informações Ambientais e de Recursos Hídricos, online: https://sistema.seia.ba.gov.br/, viewed in May 2026.
(10) Sistema Estadual de Informações Ambientais e de Recursos Hídricos, online: https://sistema.seia.ba.gov.br/, viewed in May 2026.

Schmidt Agrícola cocoa case

Ownership & Business relationship

Owners:
Schmidt Agrícola / Schmidt Cacau

BioBrasil Produção de Mudas

Antônio Luís de Moraes Pedroza (Fazenda Itacolomy)

Company responses:

Schmidt Agrícola: Did not respond to the request for review in May 2026.

Case description (2/2)

Moreover, as shown in second page of this case, the BioBrasil nursery and its surrounding parcels, owned by three of the Schmidt brothers and the supplier of cocoa seedlings to the cocoa project, are declared as Fazenda Itacolomy in the rural cadastre SIGEF 2026 system, registered by Antônio Luís de Moraes Pedroza. Fazenda Itacolomy (also spelled as Itacolomi) is directly linked to BioBrasil in business information documents (11). The self-declared CAR ownership of the properties with clearing was unfilled in the registration records.

Between 2021-2025, a total of 140 ha of forested savanna was cleared on these properties, of which 48 ha of the native vegetation cleared area falls into the FAO Forest definition and would be non-compliant with the EUDR (12). The location of the nursery (see photo previous page) is likely also the place where there is reference to the 'Schmidt Agrícola cocoa' cultivated in full sun, as indicated in social media posts (13). Unrelated to cocoa, between August and December 2023, AidEnvironment detected 1,554 ha of deforestation by on another Schmidt Agrícola operated farm (Fazenda Rio de Janeiro) in Barreiras (Bahia), potentially linked to coffee or grains production (14).

Apart from these potential occasions of deforestation linked to Schmidt Agrícola, there is also a risk for labour issues. Moisés Schmidt indicated in interviews that on his cocoa plantations, "*the only thing that is not mechanized yet is the fruit picking from the trees*" (15). Involving (hired) labour on these enormous planned cocoa farms runs the risk of labour violations and require continuous due diligence checks and monitoring. A cocoa expert indicated that "*severe labour issues are structural in nearly all Brazilian large cocoa plantations*" (16). In July 2025, Schmidt Cacau was fined by labour inspectors from the Ministry of Labour for failing to meet the hiring quota for people with disabilities and young apprentices, and for obstructing the inspection (17). The company has 175 registered employees.

This case exemplifies that Cargill, with confirmed business links to Schmidt Cacau, but also other key Brazilian cocoa traders and processors including Barry Callebaut and Ofi (18), require thorough due diligence protocols and checks to avoid deforestation and potential legality risk, now and in the future. An initial examination of CAR declarations and cocoa producers will likely not reveal any issues in this case, while the more in-depth investigation demonstrates that cocoa-linked deforestation may have occurred. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source Brazilian cocoa from Cargill, Barry Callebaut, and Olam (19).

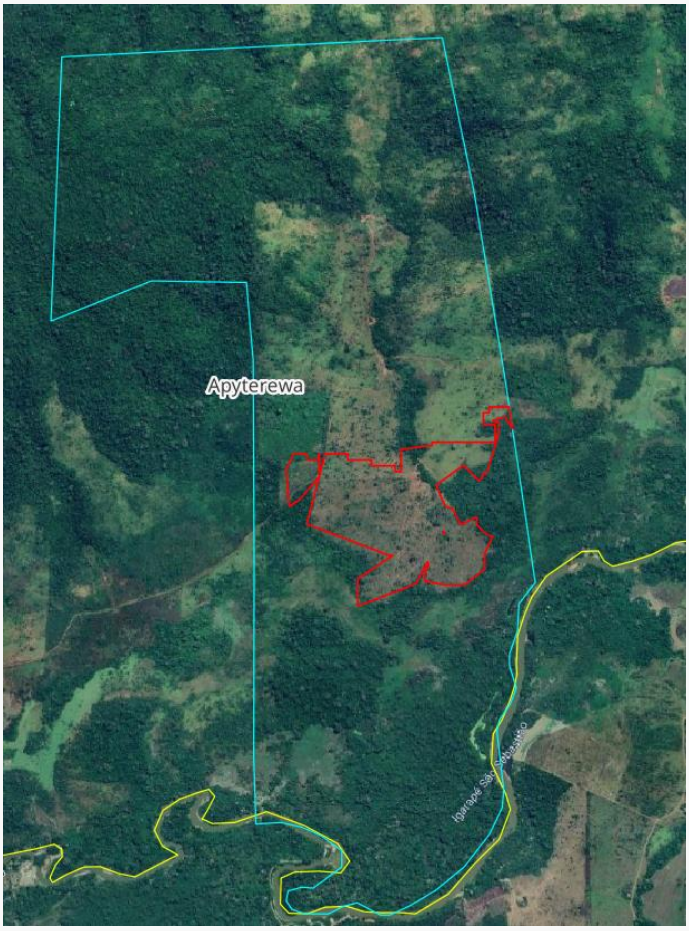
(11) CNPJ Biz, online: https://cnpj.biz/39715105000162, viewed in May 2026.
(12) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(13) Instagram, online: https://www.instagram.com/reels/CyjnhiVRyMp/, viewed in May 2026.
(14) AidEnvironment JDE Peet's company profile, online: https://coffeewatch.org/documents/33/JDE_Peets_Company_Profile.pdf
(15) Reuters (22 April 2025), online: https://www.reuters.com/markets/commodities/brazils-would-be-cocoa-king-aims-revolutionize-industry-with-giant-farm-2025-04-22/, viewed in May 2026.
(16) *Pers. comm*. Antonie C. Fountain of Cocoa VOICE Network (27 March 2026); Cocoa Barometer.
(17) Ministry of Labour inspection, online: https://eprocesso.sit.trabalho.gov.br/ProcessoEletronico/Consultar/ProcessosPorEmpregador, (fiscal number: 36.586.770/0001-05), viewed in May 2026.
(18) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(19) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.

Fazenda Fé em Deus

Location: São Félix do Xingu (Pará)
Biome: Amazon (Brazil)
Size property (ha): 638
Coordinates property: -6.00155, -52.15489

Cleared Area

51	hectares	**Period clearance:** February to April 2022	**Type of vegetation:** Submontane Dense Humid Forest
28,985	tons of CO_2		



Imagery: Fazenda Fé em Deus (blue polygon) in São Félix do Xingu (Pará), before and after clearing (red polygon).
Source: AidEnvironment, based on PRODES , CAR Brasil.

February 2022

April 2022

Source: ©2026 Planet Labs Inc.

27 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

Fazenda Fé em Deus

Ownership & Business relationship

Owner:

Adelson Costa da Cruz

CAR: PA-1507300-106F138973F34632BB9B46B58C9A62D8 (cancelled)

Company responses:

In response to nine Brazilian cocoa cases shared with key cocoa traders, **Cargill** stated on 5 June 2026 that it has no active commercial cocoa link to this case. Cargill did however not rule out any indirect or historical cocoa supply chain linkages. **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out. **Barry Callebaut** stated (5 June 2026) for Fazenda Fé em Deus and Fazenda Santa Luzia: "*Barry Callebaut acknowledges historical, limited commercial activity. In both cases, deliveries were discontinued. Given the duration of this disengagement (over three years in both cases), we do not consider these cases to present risk of non-compliance with regards to internal policies or applicable legal frameworks.*"

Environmental sanctions

Embargoes:	Yes	An embargo issued by Ibama in 2022 due to illegal deforestation of 18.3 hectares overlaps Fazenda Fé em Deus but was registered in the name of Eliezer Gomes Ferreira; another embargo in linked property Sítio Refúgio, in Alenquer, Pará.
Environmental fines:	Yes	2 environmental fines for obstructing the investigation of environmental crimes inside the Indigenous Territory Apyterewa in December 2020 (BRL 83,000)

Case description

AidEnvironment detected 51 ha for clearing of Submontane Dense Humid Forest vegetation on Fazenda Fé em Deus São Félix do Xingu (Pará) between February and April 2022, which is likely linked to cocoa (and wood) production. About half of the clearing falls within the EUDR/FAO definition of forest and would be therefore noncompliant with the EUDR (1).

Owner of Fazenda Fé em Deus, Adelson Costa da Cruz, is considered an invader of the Apyterewa Indigenous Territory in Pará, where the property is located. He has been identified as one of the leaders of the resistance against the removal of non-Indigenous occupants from the territory during the removal operation carried out by the National Public Security Force in 2023 (2, 3, 4). At the time, the Federal Police searched for Adelson, who was considered a fugitive (4). He was cited by the Brazilian Institute of Environment and Renewable Natural Resources (Ibama) for attempting to obstruct the operation through violence and serious threats, "with the aim of exploiting raw material (timber) belonging to the federal government," according to the lawsuit (5).

In addition, Adelson is a defendant in criminal cases involving alleged offenses committed within the Indigenous territory, including crimes against property, fraud, agrarian crimes, environmental and genetic heritage crimes, illegal timber extraction or exploitation, and related offenses (6). The Rural Environmental Registry (CAR) of Fazenda Fé em Deus entirely overlapped the Apyterewa Indigenous Territory and was cancelled in 2015 (7). An embargo issued by Ibama in 2022 due to illegal deforestation of 18.3 hectares also overlaps Fazenda Fé em Deus but was registered in the name of Eliezer Gomes Ferreira (8).

In October 2023, a labour inspection took place at an illegal cocoa plantation operated by invaders inside the Apyterewa Indigenous Territory, including Adelson Costa da Cruz's property Fazenda Fé em Deus (9). Labour inspectors identified indications that workers were being subjected to conditions analogous to slavery. However, no workers were found during the inspections, likely because they had fled to avoid the inspectors (9). On the property, inspectors identified a structure used for shelling cocoa beans after harvest (9).

In February 2026, Adelson da Cruz had 30 hectares embargoed by Ibama on another property, Sítio Refúgio, in Alenquer, Pará (10). As a result of the environmental violation, he's facing a lawsuit filed by the Federal Public Prosecutor's Office (11). Other than cocoa, an earlier coverage of the case suggests that Fazenda Fé em Deus is also involved in cattle production, being an indirect supplier of JBS (Tucumã - PA) and Frigol (São Félix do Xingu - PA) in 2023 through the property Fazenda Valdirene Pereira Gomes (São Félix do Xingu –PA) (12).

No authorization for deforestation at Fazenda Fé em Deus was identified, which may suggest that the deforestation took place illegally under Brazilian legislation. Key cocoa buyers and processors in Brazil —largely dominated by Barry Callebaut, Cargill, and Ofi (13)— may struggle to demonstrate negligible deforestation and legality risk under relevant legislation including the Brazilian Forest Code, EUDR, or CSDDD when sourcing and processing cocoa from Brazil, potentially from this farm. The same applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (14).

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(2) File 'Inicial da ação' (available upon request).
(3) File 'Prisão decretada' (available upon request).
(4) Globo (2023), online: https://g1.globo.com/pa/para/noticia/2023/12/20/pf-faz-buscas-por-dois-fazendeiros-que-atuavam-como-liderancas-para-impedir-retirada-de-invasores-da-ti-apyterewa-no-pa.ghtml, viewed in May 2026.
(5) File 'Auto ibama – TI' (available upon request).
(6) File 'Inicial da ação' (available upon request).
(7) File 'Fazenda Fé Em Deus em Sao Felix do Xingu - PA - Demonstrativo SICAR' (available upon request).
(8) File 'Embargo Fazenda Fé em Deus' (available upon request).
(9) File 'Op 318 de 2023 - Adelson Costa da Cruz' (available upon request).
(10) Embargo Ibama (available upon request). CAR number: CAR PA-1500404-35CA03FCC2F7426F9A3CC7FBB6566958.
(11) File 'Ação ambiental - Sítio Refúgio' (available upon request).
(12) AidEnvironment RDM report 8 (December 2022), online: https://aidenvironment.org/wp content/uploads/2023/01/LIFE_RDM_Report_8_Dec_2022.pdf, viewed in May 2026; Confirmed in cattle transfer data (GTA).
(13) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(14) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.

PA Ressaca in Itatá Settlement Project

Location: Senador José Porfírio (Pará) **Biome:** Amazon (Brazil)

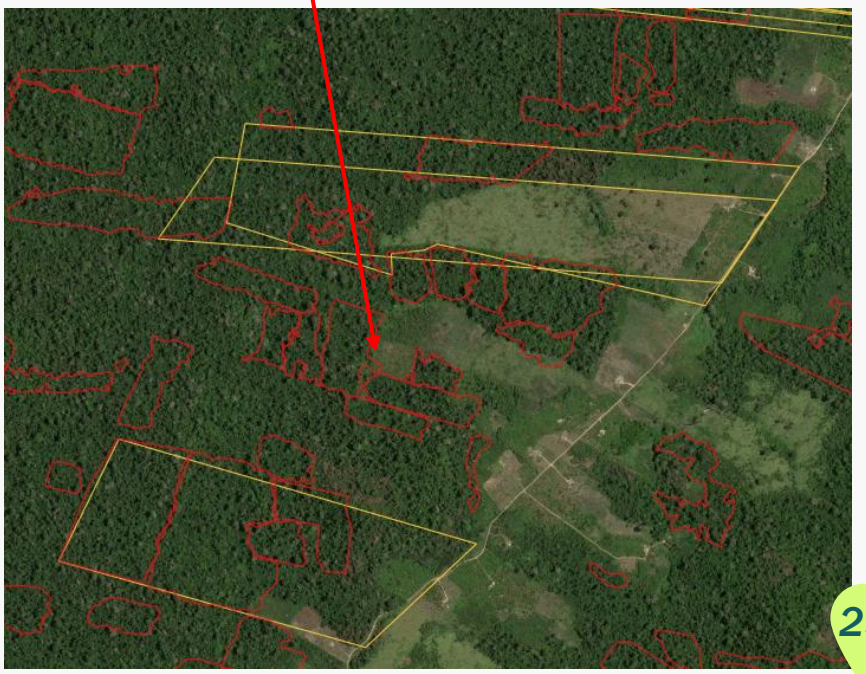
Size property (ha): Unknown **Coordinates property:** -3.76558, -52.05207

Cleared Area

N/A	hectares	**Period clearance:** N/A	**Type of vegetation:** Submontane Dense Humid Forest
N/A	tons of CO_2		

Imagery on top: Itatá Settlement Project (blue boundaries). Source: AidEnvironment, based on CAR Pará and Google Maps.

Note: the red dot in the north-eastern part of the settlement represents the coordinates (-3.76558, -52.05207) of the property from Roberto Rodrigues da Rocha that allegedly cleared forest for cocoa cultivation.



Imagery bottom right: self-declared CAR polygons (yellow) within the Itatá Settlement Project with deforestation alerts. Note: the CAR property located right under the Roberto Rodrigues da Rocha cleared property, with CAR number PA-1507805-E51F0E9AE99641CC8C308201A12756C3, is registered by relative Josiel Rodrigues da Rocha, and contains embargoed area. There are various Mapbiomas deforestation alerts in the area.

Sources: Mapbiomas Alerta (May 2026), Ibama embargo (February 2026).

PA Ressaca in Itatá Settlement Project

Ownership & Business relationship

Owner:

Roberto Rodrigues da Rocha

CAR: PA-1507805-AACD68DE715E48248D812F24CFE3D773

Company responses:

In response to nine Brazilian cocoa cases shared with key cocoa traders, **Cargill** stated on 5 June 2026 that it has no active commercial cocoa link to this case. Cargill did however not rule out any indirect or historical cocoa supply chain linkages. **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out. **Barry Callebaut** stated (5 June 2026) on PA Ressaca (Josiel Rodrigues da Rocha): "*We confirm indirect sourcing via a third-party trader since 2021. We will conduct a field investigation to resolve spatial inconsistencies in the report's identification and will not resume purchases until compliance is confirmed.*"

Environmental sanctions

Embargoes:	Yes	In November 2020, Roberto Rocha was fined and embargoed by Pará Environment Agency for clearing 2.6 hectares of native forest without authorization, and for using a chainsaw without authorization.
Environmental fines:		

Case description

In November 2020, Roberto Rocha was fined and embargoed by the Pará Environment Agency for clearing 2.6 hectares of native forest without authorization in a property indicated as "PA Ressaca" (1). The property is located in a settlement project called Itatá, run by the National Institute for Colonization and Agrarian Reform (Incra) (2). As the imagery on the previous page demonstrates, Mapbiomas alerted deforestation in the area (3). Since the polygon coordinates for the plot of land operated by Roberto Rodrigues da Rocha within the settlement could not be confirmed, Aidenvironment could not put an exact number to the amount of deforestation, nevertheless, several sources confirm the deforestation. Environmental documents state the producer was also fined for using a chainsaw without authorization and that he was clearing the land to plant cacao (4).

The self-declared CARs surrounding Roberto's plot (see previous page) are among others linked to Josiel Rodrigues da Rocha (5), clearly a relative in a property that also contains embargoes.

This case confirms that cocoa-related deforestation is still present in tropical rainforests in Brazil, and that key cocoa purchasing and processing companies in Brazil, largely controlled by Barry Callebaut, Cargill, Ofi (6), may not be able to achieve negligible risk in their due diligence efforts under the EUDR when buying cocoa beans from Brazil, and potentially from this property. In all transparency, Barry Callebaut confirmed indirect sourcing via a third-party trader since 2021 from PA Ressaca (Josiel Rodrigues da Rocha), and the company will "*conduct a field investigation to resolve spatial inconsistencies in the report's identification and will not resume purchases until compliance is confirmed.*" Less transparent and only focused on direct sourcing are responses from Ofi and Cargill, that may still be directly or indirectly connected to this farm (see general responses above).

The same struggle for negligible risk applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (7). Measured in a straight line, the farm is located about 65 KM away from some of cocoa facilities (warehouses, cooperatives) of these traders in Altamira (Pará). Since Brazil is a net importer of cocoa products, most cocoa will likely stay in Brazil, likely involving less deforestation compliance risk under the EUDR. This case however also implies noncompliance under Brazilian law, specifically the Brazilian Forest Code, since also no authorization for deforestation was identified.

(1) File 'Desmatamento' (available upon request).
(2) File 'CAR_itata_senadorjoseporfirio' (available upon request).
(3) Mapbiomas Alerta, online: https://alerta.mapbiomas.org/, viewed in May 2026.
(4) File 'Autuação relatório' (available upon request).
(5) CAR Pará, online: https://car.semas.pa.gov.br/#/, viewed in May 2026.
(6) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(7) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.

Fazenda Gameleira

Location: Uruará (Pará)
Biome: Amazon (Brazil)
Size property (ha): 897
Coordinates property: -3.69437, -53.45092

Cleared Area

47	hectares	**Period clearance:** July 2022 to November 2024	**Type of vegetation:** Open Submontane Humid Forest
23,423	tons of CO_2		

July 2022

Nov 2024

Imagery: Fazenda Gameleira in Uruará in Pará (blue polygon), before and after clearing (red polygons).
Source: AidEnvironment, based on PRODES , SIGEF/SNCI. Imagery ©2026 Planet Labs Inc.

36 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

Fazenda Gameleira

Ownership & Business relationship

Owner:	Company responses:
Nelson Lauer Junior CAR: PA-1508159-0674D12A904F4A4F8E47B0E9368689AA	In response to nine Brazilian cocoa cases shared with key Brazilian cocoa producers and international cocoa traders, **Cargill** stated (5 June 2026) that based on "*a review of supplier names, CARs and geolocation coordinates, in line with our Human Rights and Environmental Due Diligence Policy and against available internal cocoa supply chain information*", the company only identified a "*current cocoa sourcing relationship with Fazenda Gameleira*", for which they did not identify "*a formal embargo or official restriction by Brazilian authorities*." By contrast, in response to this Fazenda Gameleira case **Barry Callebaut** stated (5 June 2026): "*Our geoprocessing analysis confirms the deforestation findings. The supplier has been suspended from our supply chain pending further investigation and remediation.*" Barry Callebaut's full response can be found here. **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to ofi and how ofi assesses the potential noncompliance identified. Fazenda Gameleira could be one of these farms. Moreover, indirect supply chain links have not been ruled out by Ofi.

Environmental sanctions

Embargoes:	No	-
Environmental fines:	Yes	Nelson Lauer Junior was fined by Pará Environment Agency in October 2010 due to the deforestation of 4.3 hectares at Fazenda Gameleira

Case description

Fazenda Gameleira, a nearly 900-hectares farm located in Uruará (Pará) cleared 47 hectares of 'Open Submontane Humid Forest' vegetation between July 2022 and November 2024, of which 76% (36 ha) is classified as forest under the EUDR definition of forest.

The Pará Environmental Agency fined the farm's owner, Nelson Lauer Junior, in October 2010 due to the deforestation of 4.3 hectares (2). The farm carries out cattle ranching and cacao activities (3). Photos shared on Google maps also confirm cocoa cultivation in the farm (4). In September 2015, Nelson Junior was fined by Ibama for using false information in Sisflora – the official system used to control forest products and byproducts, such as timber, wood, and charcoal – to create forest credits that should not have existed, allowing the irregular movement or sale of forest products (5). Although the environmental violation does not specify the name of the property, the geographic coordinates of the fine point to Fazenda Gameleira.

Key cocoa buyers and processors in Brazil—largely dominated by Barry Callebaut, Cargill, and Ofi (6) —may struggle to demonstrate negligible risk under the EUDR when sourcing cocoa from Brazil, potentially from this farm. Indeed, as the responses from the key cocoa traders reveal (see above), both Cargill and Barry Callebaut confirmed sourcing cocoa from Fazenda Gameleira, while Ofi may do so as well. On June 5, 2026, Barry Callebaut confirmed suspension of this supplier from its supply chain due to AidEnvironment's and its local partner's investigations, stating that Barry Callebaut's "*geoprocessing analysis confirms the deforestation findings*" (7).

The same struggle for negligible risk applies to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source (Brazilian) cocoa from traders Cargill, Barry Callebaut, and Olam (8). The farm lies just over 30 KM away from several warehouses and cooperatives in Uruará (Pará) linked to these buyers, increasing the likelihood of supply chain linkage. Since Cargill, contrary to Barry Callebaut, does not suspend Fazenda Gameleira from its supply chain despite the confirmed deforestation, the cocoa from the cleared farm may end up in the supply chains from Nestlé, Mars, and Mondelēz. The case illustrates that variety in the robustness of cocoa companies' due diligence systems and linked mitigation actions increases this risk.

Since Brazil is a net importer of cocoa products, a significant share is consumed domestically, implying lower exposure to EUDR compliance risks for these volumes. Nevertheless, no authorization for deforestation at Fazenda Gameleira was identified, which may suggest that the deforestation took place illegally under Brazilian legislation.

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(2) File 'Desmatamento 2010 - 4 hec' (available upon request).
(3) File 'Atividade cacaueira' (available upon request).
(4) Google maps, online photos tagged at Fazenda Gameleira, viewed in June 2026.
(5) File 'nelsonlauerjr_ibama_fine', (available upon request).
(6) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(7) Barry Callebaut review of Brazilian cocoa cases (5 June 2026), online: https://aidenvironment.org/wp-content/uploads/2026/06/Barry-Callebaut-response-cocoa-Brazil-5-June-2026.docx, viewed in June 2026.
(8) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.

Chácara do Caçula

Location: Medicilândia (Pará)

Biome: Amazon (Brazil)

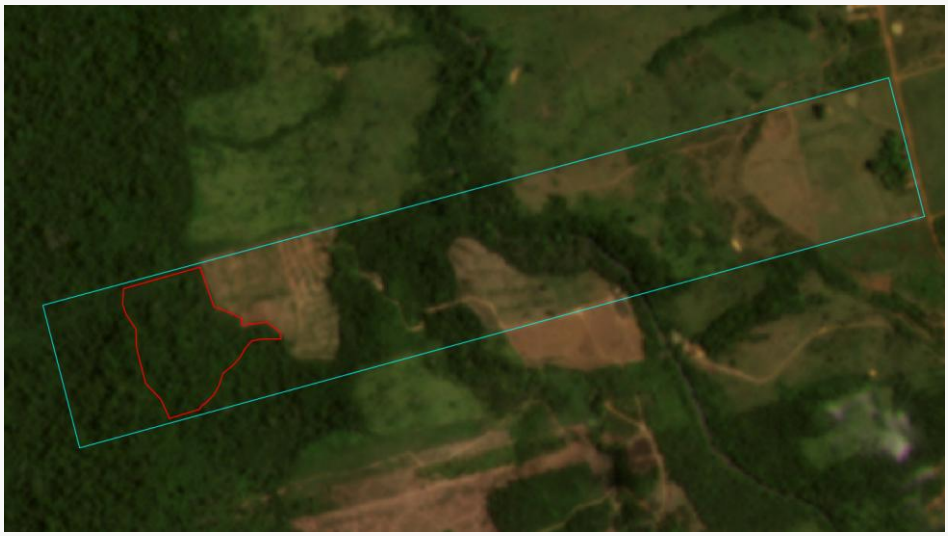
Size property (ha): 96

Coordinates property: -3.43861, -52.95212

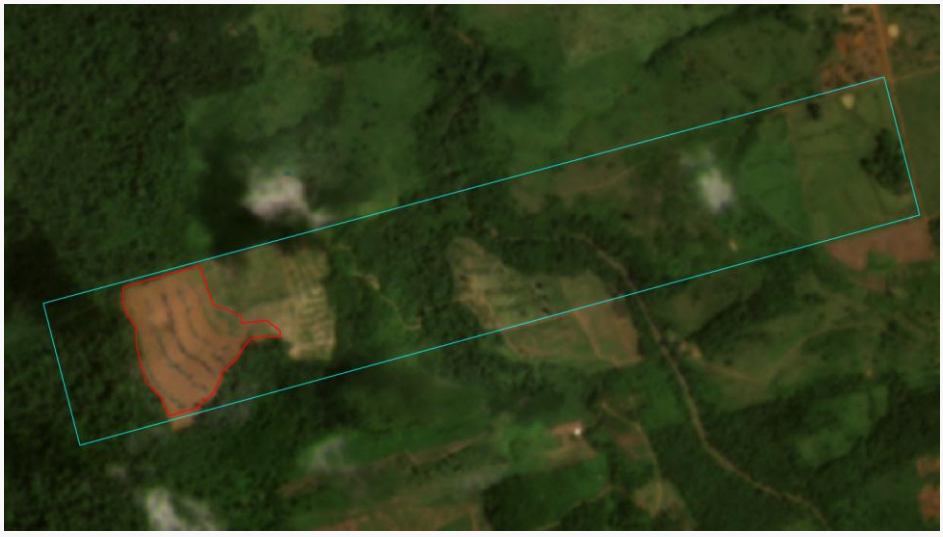
Cleared Area

9.2	hectares	**Period clearance:** September 2021 to January 2022	**Type of vegetation:** Submontane Dense Humid Forest
5,228	tons of CO_2		

Sep 2021



Jan 2022



9 ha of the native vegetation cleared area falls into the FAO Forest definition and may be **non-compliant with the EUDR**

Imagery: Chácara do Caçula (blue polygon) in Medicilândia (Pará), before and after clearing (red polygon).
Source: AidEnvironment, based on PRODES, CAR Brasil. Imagery ©2026 Planet Labs Inc.

Chácara do Caçula

Ownership & Business relationship

Owner:
Genildo Gomes de Araújo (SIGEF)

Antonio Resplandes Dias and José Alves das Neves (Sítio São Francisco II)
(CAR: PA-1504455-D22A83619F884D06BAE99FA38C3DB5F7)

Company responses:
In response to nine Brazilian cocoa cases shared with key cocoa traders, **Cargill** stated on 5 June 2026 that it has no active commercial cocoa link to this case. Cargill did however not rule out any indirect or historical cocoa supply chain linkages. **Olam Food Ingredients (Ofi)** stated (9 June 2026) that "*seven of the cocoa farms in Brazil [out of nine, ed.] have never been a direct supplier to ofi*", without reference to specific farm names. While the company asserts that "*active suppliers must adhere to ofi's Agri supplier code*", it remains unclear which two farms are directly linked to Ofi and how Ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out. **Barry Callebaut** stated (5 June 2026) on Chácara do Caçula: "*a very limited volume was sourced indirectly in 2024 from an individual associated with this property. The supply relationship has been flagged, and we will conduct field-level mapping to determine whether cocoa originated from the affected area. Sourcing is suspended pending this investigation.*"

Environmental sanctions

Embargoes:	No	-
Environmental fines:	Yes	15 labour fines in 2023, including for keeping an employee without proper registration, failing to provide fresh drinking water at the work sites, failing to provide sanitary facilities at the work fronts, and failing to provide workers with protective equipment.

Case description

Chácara do Caçula cleared nine hectares of Submontane Dense Humid Forest, classified as forest under the EUDR definition (1), between September 2021 and January 2022, therefore after the EUDR cut-off date.

Other than deforestation, in April 2023, a labour inspection identified irregular working conditions among employees working in the cocoa harvest at Chácara do Caçula, in Medicilândia, Pará. Genildo Gomes de Araújo received 15 labour fines, including for keeping an employee without proper registration, failing to provide fresh drinking water at the work sites, failing to provide sanitary facilities at the work fronts, and failing to provide workers with protective equipment. The labour inspection concluded that the conditions did not constitute labour analogous to slavery (2). Another Rural Environmental Registry (CAR) corresponding to Chácara do Caçula geographic coordinates is registered under the name of Sítio São Francisco II, registered by Antonio Resplandes Dias and José Alves das Neves (3).

Key cocoa buyers and processors in Brazil —largely dominated by Barry Callebaut, Cargill, and Ofi (4)— may struggle to demonstrate negligible risk under the EUDR when sourcing cocoa from Brazil, potentially from this farm. Indeed, Barry Callebaut confirmed sourcing limited volumes from this farm in 2024 and suspended sourcing until it has conducted field-level mapping (see response above). As other responses indicate above, Ofi could be directly linked to this farm, and Cargill indirectly. The same struggle to demonstrate negligible risk may apply to some of the largest global players in cocoa-based chocolate and confectionery, such as Nestlé, Mars, and Mondelēz, that source cocoa from these traders (5). The farm lies just over 8 KM away from warehousing facilities in Medicilândia (Pará) linked to some of these buyers (e.g. Barry Callebaut), increasing the likelihood of supply chain linkage. As Brazil is a net importer of cocoa products, a significant share is consumed domestically, implying lower exposure to EUDR deforestation compliance risks for these volumes. Nevertheless, no authorization for deforestation at Fazenda Chácara do Caçula was identified, which may suggest that the deforestation took place illegally under Brazilian legislation. Moreover, labour irregularities may also be considered a risk under the legality requirements of the EUDR, or the CSDDD, with Barry Callebaut, Ofi, and Cargill falling within the scope of the Directive (6).

(1) EU Forest Observatory Global Forest Map, online: https://forest-observatory.ec.europa.eu/forest, viewed in May 2026.
(2) Online labour inspection report (anonymized), online: https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/operacoes-2023/op-02-de-2023-g-g-a-pa.pdf/view, viewed in May 2026.
(3) Registro Rural, online: https://www.registrorural.com.br/imoveis/car-PA-1504455-D22A83619F884D06BAE99FA38C3DB5F7/sitio-sao-francisco-ii-em-medicilandia-pa, viewed in May 2026 / Cattle transfer (GTA) database and linked CARs.
(4) Brazilian Association of Cocoa Processing Industries - AIPC, online: https://aipc.com.br/en/, viewed in May 2026.
(5) Public cocoa supplier lists of Nestlé, Mars, Mondelēz, viewed in May 2026.
(6) SOMO CSDDD datahub, online: https://www.somo.nl/csddd-datahub/ - look-for-company, viewed in May 2026.

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