

# Compliance Checker

## EUDR compliance risks

*2026 assessment report*

A systematic review of 200+ cases of deforestation or legality risks and recent developments on seven cases linked to commodities in scope of the EUDR



# Executive summary

*This review study has assessed 228 commodity cases, developed by AidEnvironment between 2022-2025, with forest loss and legality issues since the EU Deforestation Regulation (EUDR) cut-off date. For a selection of cases, we have assessed whether the cleared plots or social violation cases have now planted commodities in scope of the EUDR and are therefore in direct risk of supplying deforestation-linked commodities to the EU market from January 2027 onwards. The report provides a unique insight in typical social and environmental violations and risks mostly found in Brazil, the agricultural powerhouse of the world, exporting basically all commodities to the EU27 relevant under the EUDR. Moreover, it demonstrates what socioenvironmental impacts could have been addressed earlier had the EUDR applied from January 2026. With another year of delay, commodities linked to forest loss and legality or social risks may continue entering opaque supply chains before full EUDR traceability and due diligence requirements apply. The report's case studies have been shared earlier with involved supply chain companies, with their responses (if available) integrated into the report.*

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This review study assesses 228 commodity cases developed by AidEnvironment between 2022 and 2025, involving forest loss and legality concerns after the EUDR cut-off date. For a selection of cases, AidEnvironment assessed whether cleared plots or sites linked to social violations are now producing EUDR-scope commodities, creating a direct risk that deforestation-linked products could enter the EU market from January 2027 onwards.

The report offers a unique insight into recurring social and environmental risks, particularly in Brazil: one of the world's largest agricultural exporters and a key supplier of EUDR-relevant commodities to the EU27. It also shows which socio-environmental impacts could have been addressed earlier had the EUDR applied from January 2026. With another year of delay, commodities linked to forest loss, legality concerns, or social violations may continue entering opaque supply chains before full EUDR traceability and due diligence requirements take effect.



## Methodology

- The sample consists of **228 commodity (soy, cattle, palm oil, cocoa, coffee, and wood) cases** with likely environmental and social violations that AidEnvironment has developed between 2022-2025, partly under its Compliance Checker [programme](#).
- Potential **noncompliance** included (list is not exhaustive): deforestation, fires, overlapping or bordering of indigenous, protected, or conservation territories, fraud, slave labour conditions, land grabbing, embargoes, cattle laundering, land title irregularities, and threats and violence towards indigenous people and local communities. The noncompliance can also occur in adjacent or linked (e.g. by ownership) properties.
- Cases were **purposely selected** from a much larger database of potential case studies and were not randomly sampled. **Selection criteria** included, among others, the presence of supply chain links to a known agricultural trader or downstream company, the size of forest loss, the involvement of commodities listed in Annex I of the EUDR, evidence of clearing after the EUDR cut-off date of 31 December 2020, and the removal of vegetation classified as forest by the FAO.
- Most cases were developed for **Brazil (221 cases)**, given its role as a major agricultural producer supplying all key forest-risk commodities listed in the EUDR to Europe, as well as the strong availability of relevant datasets for analysis. Other countries include Côte d'Ivoire (3 cases), Indonesia (2 cases), and Cameroon (2 cases).
- As a result of the focus on Brazil and the purposive selection approach, the sample may **not be fully representative**. For instance, several cases have specifically targeted issues such as land grabbing. However, the frequency of such cases already found in the sample, also indicates that **land grabbing** is a significant concern in the country.
- During the period of case development (2022–2025), alert cases were **shared with the companies concerned**, and their responses, if provided, were incorporated into the cases.
- We have assessed the 228 cases on social and environmental violations and risks and selected seven cases based on geospatial monitoring that currently have cattle walking around or **planted** commodities in scope of the EUDR **on the previously cleared or violated plots** and are therefore in direct risk of supplying deforestation-linked commodities to the EU market from January 2027.

# Sample characteristics: 228 cases



## Soy and cattle cases linked to Bunge, JBS, and Cargill most prevalent

Most grievance cases in the sample of 228 cases are linked to **soy** (145 times reported) and **cattle** (106 times reported) in Brazil. This is followed by wood (24), coffee (14), corn (10), cotton (8), palm oil (5) and cocoa (5). Nearly all cases occurred in Brazil (221 cases). Ninety-four, or 21% of the cases with social and environmental violations have potential links to **Bunge**, 84 cases, or 19% to **JBS**, and 50 cases, or 11% to **Cargill** (Figure 1). Cases can be tied to multiple commodities and companies.

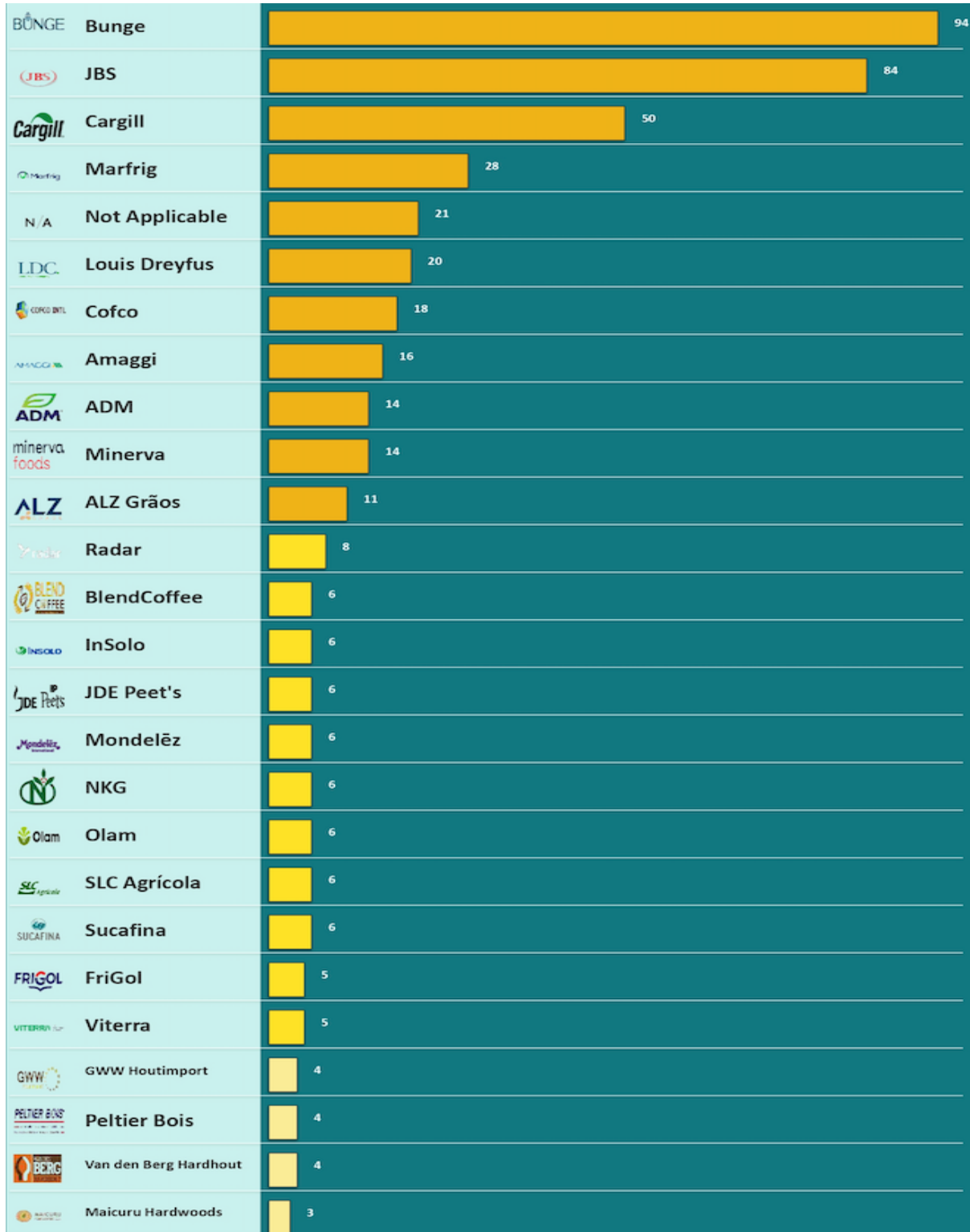


Figure 1: Reported company occurrence in the 228 cases. Source: AidEnvironment Compliance Checker in June 2026. A case can be linked to multiple companies. Occurrence in the sample does not imply a guaranteed supply chain link.

Note: Bunge did not respond to most of the report cases, therefore, the company is flagged for many “potential” case links.



## Most occurring social and environmental violations in the cases

AidEnvironment detected **936 potential noncompliance events** across the 228 Compliance Checker cases, indicating that many cases involve multiple potential non-compliance issues. These events were initially grouped into 45 types of social and environmental violations (Figure 2). As many legality-related matters are not publicly disclosed or are subject to secrecy, the absence of evidence of a violation should not be interpreted as evidence that no violation occurred.

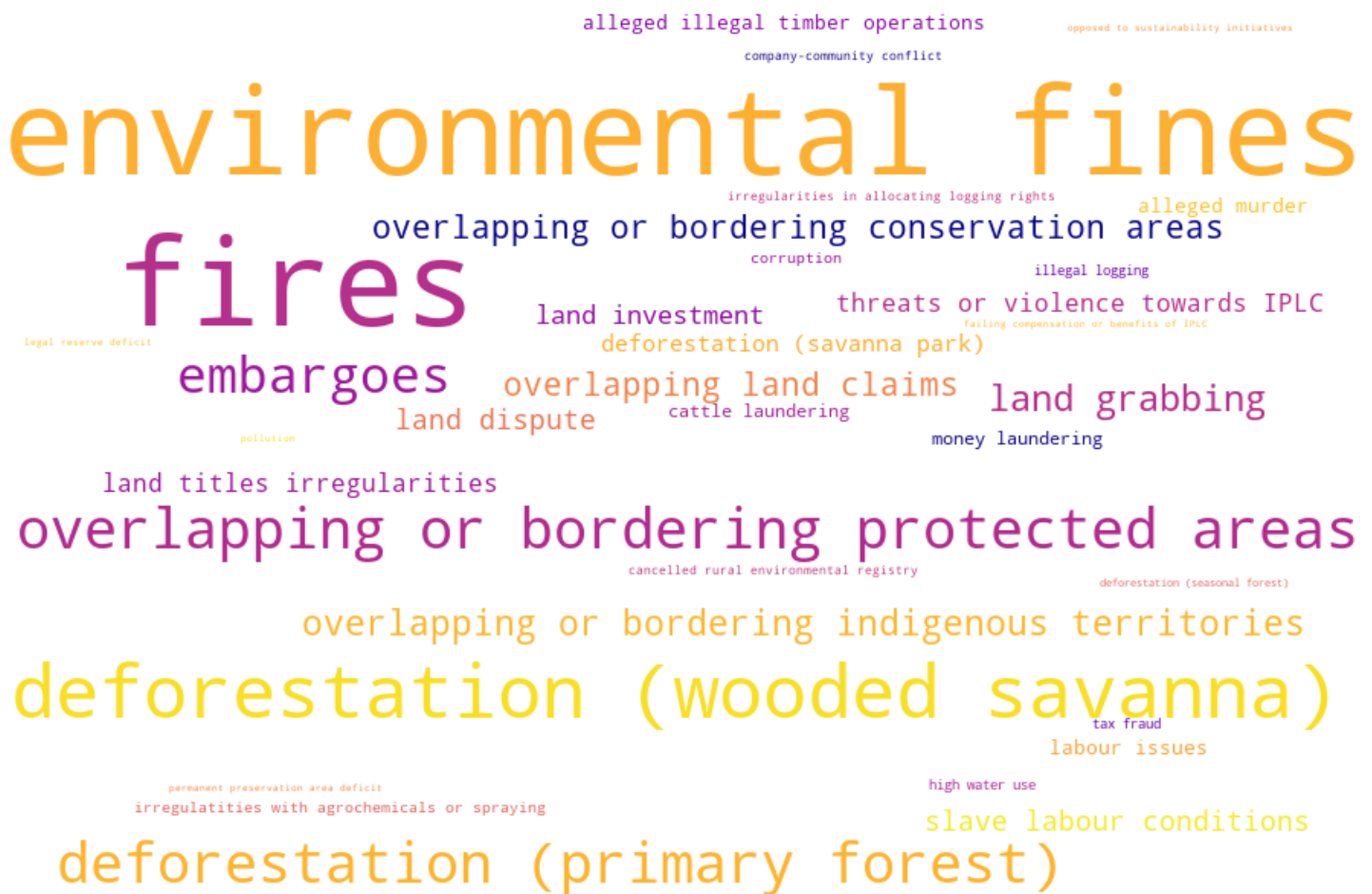


Figure 2: Word cloud of most reported social and environmental violations and risks in the sample. Source: AidEnvironment [Compliance Checker](#) in June 2026

The most frequently observed types of environmental violations in the sample are fires and environmental fines (each reported in 50% of the cases), clearing of wooded savanna, mostly in the Brazilian Cerrado (47%), overlapping or bordering protected areas (45%), deforestation of primary forest, mostly in the Brazilian Amazon (44%), and embargoes, also in linked properties (34%). Some of these events may be permitted under the Brazilian Forest Code, for example where environmental licences for clearing or controlled burning were identified. However, the associated forest loss may still fall within the EUDR's definition of non-compliant deforestation.

Specifically linked to social violations, land grabbing (reported in 16% of the cases), overlapping land claims (11%), slave labour conditions (8%), land investment/speculation (7%), land titles irregularities (6%), and threats and violence towards indigenous people and local communities (IPLC) (6%) are most reported.



## Details of cases with reported deforestation, potentially linked to Bunge, JBS, Cargill, Marfrig, LDC

Figure 3 below details on the 228 cases in the sample, potentially linked to the top-5 most occurring companies in the sample: Bunge, JBS, Cargill, Marfrig, and Louis Dreyfus Company (LDC).

Top-5 most reported companies	Bunge	JBS	Cargill	Marfrig	LDC
Mentions in cases (total n = 228)	94	84	50	28	20
Of which confirmed* (n cases)	24	43	20	13	7
Of which probable* (n cases)	21	37	8	15	10
Of which potential* (n cases)	49	4	22	0	3
Total vegetation cleared (ha)**	222,172	134,275	86,779	60,331	21,805
Of which Amazon vegetation (ha) (n cases in Amazon biome)	46,507(26)	98,870 (62)	15,783 (8)	53,185 (25)	6,332 (10)
Of which Cerrado vegetation (ha) (n cases in Cerrado biome)	175,664 (68)	25,499 (14)	70,897(41)	3,699 (2)	15,473 (10)
Of which other vegetation (ha)	-	10,505 (Pantanal)	99 (Borneo Tropical Forests)	3,447 (Pantanal)	-
Active license***? (n Unconfirmed)	65	49	35	18	13
Active license? (n Likely)	28	22	15	9	5
Active license? (n No)	1	13	0	1	2
Total carbon emissions (tons of CO2)*	10,007,450	13,720,619	6,530,022	1,861,394	1,458,040

**Figure 3: Details of the cases with reported deforestation linked to the top-5 occurring companies.** Source: AidEnvironment Compliance Checker in June 2026. Notes: \*See AidEnvironment Compliance Checker [website](#) for the classification of confirmed, probable, and potential cases and the [calculation](#) of carbon emissions (only in 221 cases linked to Brazil). \*\* Total vegetation cleared in the cases potentially linked to the companies. \*\*\* Whether Brazilian authorities have provided a valid license for clearing native vegetation. Bunge did not respond to most of the report cases; therefore, the company is flagged for many “potential” case links. One farm case reports both Amazon and Cerrado native vegetation loss of 599 ha. This explains the difference between the ‘total vegetation cleared’ and the separate Amazon and Cerrado total amounts, that have both included the 599 ha in their totals.

The findings suggest that cases linked to JBS and Marfrig mostly involve Amazon deforestation, reflecting also a larger number of cattle-related farm cases in the sample located there. By contrast, soy and other grain-linked deforestation is more strongly associated with the Cerrado biome. Although Bunge accounts for the largest share of total reported clearing in the sample, this is likely influenced by the company’s lack of response during most review rounds, which means many supply chain links remain [classified](#) as “potential” rather than (un)confirmed.

JBS has the highest number of confirmed alert cases: 43 out of 84 cases, or 51%. This is partly because AidEnvironment was able to substantiate cattle supply-chain links through official cattle movement records, despite JBS’s limited responsiveness and transparency during case review rounds between 2022 and 2025. AidEnvironment’s Brazil cattle [dataset](#) combines cattle movement records with farmer cadastre data and includes a confirmed sample of 36,441 direct and 103,932 indirect supplying farms linked to JBS, Marfrig, and Minerva. For Cargill, 40% of linked cases were confirmed, which likely also reflects the company’s comparatively higher responsiveness and transparency during review rounds.

Where possible, AidEnvironment and its local partners assessed whether Brazilian authorities had issued valid licenses for native vegetation clearing or controlled fires. For JBS-linked cases, 13 out of 84 cases appeared to lack an active license at the time of clearing, suggesting stronger exposure to illegal deforestation. Across the wider sample, active clearing licenses were identified in roughly 35% of cases (but may not have been identified for all cases based on available data, therefore, the total percentage could be higher). However, while such licenses may make the clearing lawful under the Brazilian Forest Code, they do not resolve EUDR compliance risks: under the EUDR, relevant products must be both legally produced and deforestation-free, meaning that post-2020 deforestation can still make products non-compliant even when the clearing was authorized under national law.



## Social and environmental violations in cases linked to key meatpackers and grains traders

Figure 4 below details on the most occurring social and environmental violations in the 228 cases in the sample, potentially linked to the key grain's traders and meatpackers sourcing in Brazil. Notable are deforestation of primary forest linked to JBS; the deforestation of wooded savanna linked to Bunge and Cargill; potential embargoes in farms directly or indirectly linked to JBS, Bunge, Marfrig, and Cargill; land grabbing cases notably linked to Bunge, JBS, and Cargill; the significant number of cases tied to JBS that show overlap or close bordering with indigenous territories; and the overlap or bordering of protected areas and conservation areas in cases potentially linked to JBS, Bunge, Cargill, and Marfrig.

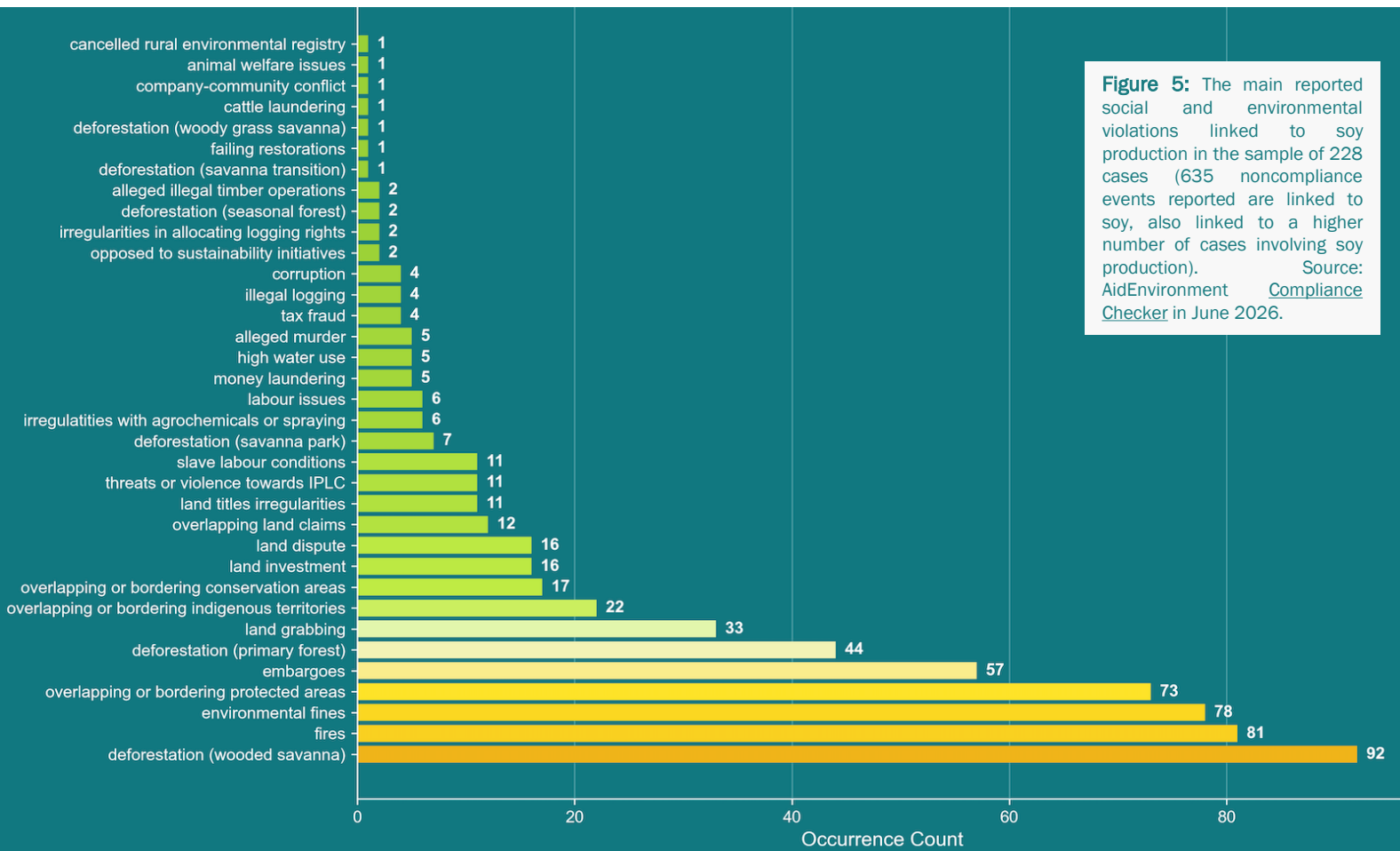


Figure 4: The main reported social and environmental violations in the sample of 228 cases, potentially linked to key soy traders and meatpackers sourcing from Brazil. Source: AidEnvironment Compliance Checker in June 2026. A potential violation can be linked to multiple companies, and one case can contain multiple violations (in total, AidEnvironment classified 936 potential noncompliance events across the 228 Compliance Checker cases).

# Commodity versus potential noncompliance

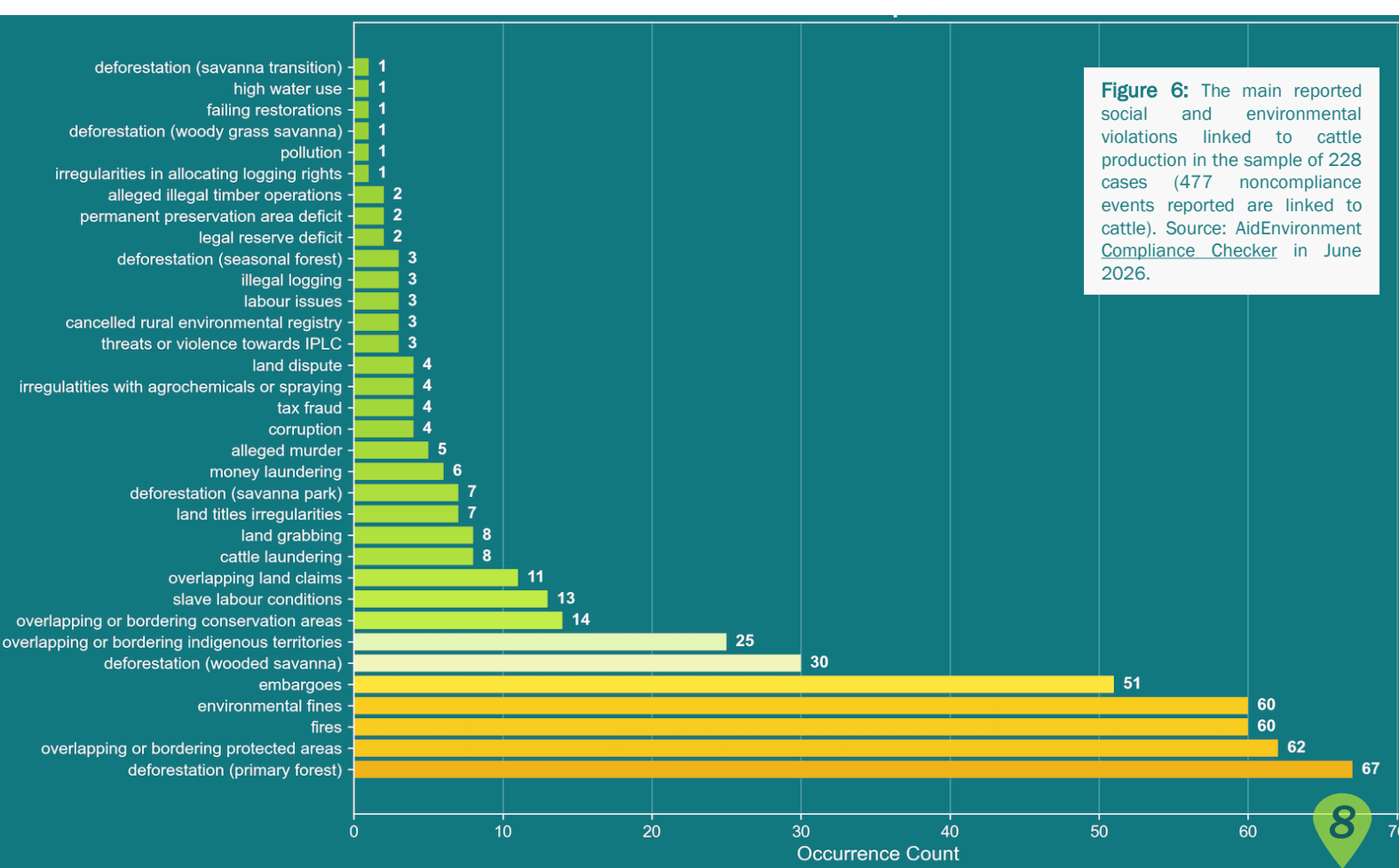


## Social and environmental violations in cases linked to soy



**Figure 5:** The main reported social and environmental violations linked to soy production in the sample of 228 cases (635 noncompliance events reported are linked to soy, also linked to a higher number of cases involving soy production). Source: AidEnvironment Compliance Checker in June 2026.

## Social and environmental violations in cases linked to cattle



**Figure 6:** The main reported social and environmental violations linked to cattle production in the sample of 228 cases (477 noncompliance events reported are linked to cattle). Source: AidEnvironment Compliance Checker in June 2026.



## Seven exemplary cases with clearing or legality issues now producing EUDR-scope commodities

This section covers **seven exemplary cases** (Figure 7) of commodity farms where cleared plots or sites linked to social violations are now producing EUDR-scope commodities, creating a direct risk that deforestation-linked products could enter the EU market from January 2027 onwards.

During the period of case development (2022–2025), alert cases were shared with the companies concerned, and their responses, if provided, were incorporated into the cases. Each case now contains additional satellite photos, visually confirming agricultural activity (coffee, palm oil, cattle, and soy) since the deforestation or social violation.

**Sources** used to confirm the agricultural activity include Mapbiomas Brasil - Collection 10 (confirmation of pasture area), Google Maps (Airbus, 2026), and Song *et. al.* 2021 (confirmation of soy planted area). Other than that, our regular sources used in Brazil include a combination of geospatial data of rural cadastre systems (CAR, SIGEF, SNCI); company asset infrastructure (warehouses/silos, palm oil mills, slaughterhouses, tanneries), deforestation (e.g. Prodes, MapBiomas), supply chain data (e.g. animal transit data, the so called GTA), fire alerts (NASA), type of vegetation, locations of indigenous territories (e.g. Funai) and protected areas (e.g. Brazilian Forest Code) to calculate deforestation exposure risk and for the investigation of human rights violations and legality risk.

Case	Commodity	Name property	Owner	Location	Potential buyers	Page
1	Coffee	Sítio Concórdia / Chácara Café	Syrio Jost Wenot / Orlando de Jesus	Alta Floresta D'Oeste, Rondônia (Brazil)	LDC, NKG, Sucafina, Olam, and BlendCoffee	10
2	Palm oil	CamVert concession	Cameroon Vert (CamVert)	Océan, Campo (Cameroon)	Socfin	13
3	Cattle	Fazenda Promissão III / Fazenda São José	Sarah de Oliveira, Marcos Antonio Boaventura (SIGEF) / Everaldo Peres Domingues Junior, Ana Rosaria Medeiros Peres (CAR, not validated)	Porto Alegre do Norte, Mato Grosso (Brazil)	JBS	19
4	Cattle	Fazenda São Sebastião	Agropecuária São Sebastião do Araguaia	Santa Terezinha, Mato Grosso (Brazil)	JBS, Minerva, Marfrig	22
5	Cattle	Lote 35, Setor D (Fazenda Lyra)	Heitor Lyra (SIGEF) / Agropecuária Santa Barbara Xinguara (AgroSB) (CAR)	São Félix do Xingu, Pará (Brazil)	JBS, Minerva, Marfrig	25
6	Soy	Fazenda Santa Maria / Santa Maria d'Oeste	Canabrava Agropecuária	Formosa do Rio Preto, Bahia (Brazil)	Bunge, ALZ Grãos, Cargill	28
7	Soy	Fazenda Roberta	Estreito Agropecuária and Rio Pratudão Agropecuária	Jaborandi, Bahia (Brazil)	Cargill, ALZ Grãos	31

**Figure 7: Overview of seven exemplary case studies of commodity farms where cleared plots or sites linked to social violations are now producing EUDR-scope commodities.** Source: AidEnvironment [Compliance Checker](#) in June 2026

# Rondônia Coffee Case (October 2025)



## Sítio Concórdia / Chácara Café

Location: Alta Floresta D'Oeste (Rondônia) Biome: Amazon (Brazil)

Size property (ha): 48

Coordinates property: -12.07883, -62.07967

### Cleared Area

9.8	hectares	Period clearance: March 2021 – May 2023	Type of vegetation: Open-canopy, submontane rainforest
4,884	tons of CO <sub>2</sub>		

July 2023



3 July 2016



4 July 2023



**Imagery: Sítio Concórdia, before and after clearing.** Source: AidEnvironment. While the “before” photo is dated in 2016 (since this was a high-resolution, cloud-free image), the actual deforestation occurred after the EUDR cut-off date of 30 December 2020. Imagery ©2025 Planet Labs Inc.

**Imagery: Sítio Concórdia** (marked with blue line). Of the deforestation (in red) of 9.8 hectares between 2021-2023, 5.1 hectares have now been planted in July 2023 with coffee. Source: AidEnvironment, based on SIGEF, Prodes, [Embrapa](#) (2024)

About 76% of the native vegetation cleared area falls into the FAO Forest definition and is **non-compliant with the EUDR**



Sítio Concórdia / Chácara Café

Agricultural activity since deforestation: coffee production (July 2023)



Imagery: Sítio Concórdia / Chácara Café, situation in July 2023, demonstrating coffee cultivation after initial clearing of the area between 2021 and 2023.

Coordinates: -12.07314, -62.07955. Source: @2026 Airbus



## Sítio Concórdia / Chácara Café

### Ownership & Business relationship

Owner:	Company responses:
<p><b>SNCR 2025: Syrio Jost Wenot</b></p> <p><b>CAR 1:</b> RO-1100015-546732103DA04DCBB7AECD A2C66B2222 (active CAR)</p> <p><b>CAR 2:</b> RO-1100015-3A2737AF8E574559A2D4D0 192FEDECAA (Orlando de Jesus) (canceled CAR)</p> <p><b>CAR 3:</b> RO-1100015-E69095ED2D27422DB247DA 96FE4BD0D1 (pending CAR)</p>	<p>In response to six coffee Rondônia cases shared with LDC, NKG, Sucafina, Olam, and BlendCoffee in July 2025, LDC states that “all 12 CARs [cited in the six cases, ed.] are marked as non-EUDR-compliant in our database, thereby preventing any future coffee deliveries from these entities to LDC”. An example EUDR Protocol Verification Report shared with AidEnvironment however reveals a few shortcomings in the due diligence process, see page 6 of <a href="#">this report</a>. Sucafina states they source from only one of the four coffee intermediaries indicated in the cases but does not disclose which one. Moreover, the company says that it “does not purchase coffee from any of the farms named in the report” and that “10 of the 12 failed our compliance filters. Two were deemed compliant based on public records and satellite imagery, but as they are not suppliers to Sucafina, no field visits were conducted”. NKG <a href="#">says</a> that its “Brazilian export company NKG Stockler does not purchase coffee from the region Rondônia in general” and “has no business relations with the cooperative Caferon”. However, the company also states that while reviewing the importers, “so far, we haven’t found any links to the farms or the cooperative. However, due to the complexity of the supply chains, we can never completely rule out the possibility that coffee from these farms may have entered our supply chain through third party sales.” Olam states that it is not connected to any of the six coffee cases in Rondônia, but without providing further details. BlendCoffee did not reply after repeated requests.</p>

### Environmental sanctions

<b>Embargoes:</b>	No	-	-
<b>Environmental fines:</b>	No	-	-

### Case description

Fazenda Sítio Concórdia (name derived from SIGEF Brazilian land management system in 2025) in municipality Alta Floresta D'Oeste (Rondônia) cleared 9.8 hectares (ha) of native vegetation between March 2021 and May 2023, therefore after the EUDR cut-off date, of which 76% of the vegetation lost can be classified as forest under the EUDR (1). This case study was also covered in the Embrapa 2024 coffee report on Rondônia, page 26 (B1 and B2 photos) (2), demonstrating that what was mapped as coffee area in 2022/2023, used to be former native vegetation in 2020. AidEnvironment calculated that of the cleared area, 5.1 ha is now planted with coffee plants. Mapbiomas Alerta confirms the clearing in two self-declared Rural Environmental Registry (CAR) files linked to the property (see CAR numbers 1 and 3 above) (3).

In the official Brazilian land management system SNCR (2025) the farm parcel is registered under ownership of Syrio Jost Wenot (4). No further information was found on this (coffee) producer. While the CAR system indicates that more than one landowner claims the property (5), the CAR system in Rondônia generally does not allow for checking the linked ownership names to the CAR numbers. However, one CAR number (see CAR 2 above) in the property is linked to self-declared owner Orlando de Jesus (5), who is also a cattle producer. From his declared property “Chácara Café” (indicating also coffee produce) he indirectly supplied (via unnamed property “LH 152, KM 22, LT 93, GB 02, STR 05, ENTRE 60 E 65 L”) Minerva’s slaughterhouse in Rolim De Moura - RO in 2018, and Marfrig’s slaughterhouse in Chupinguaia-RO in 2020, indirectly through two farms (e.g. Fazenda Rio Preto) (6). Moreover, the property also overlaps with a mining permit requested by Cooperativa dos Garimpeiros e Mineradores do Brasil for gold extraction (7).

The property is about 70 KM away from a group of five coffee warehouses in the Nova Brasilândia D'Oeste municipality in Rondônia that will, based on proximity, potentially source from this property: Jacomim Só Café; Zeno Comércio de Café e Cereais; Comargil Comercio De Café, and Café Master Comércio de Café e Cereais (8). According to a sample of Brazilian shipment data, between 1 January 2023 and 30 November 2023, the top-5 robusta coffee exporters (excluding logistical companies) from three Brazilian ports (Santos, Paranaguá, and Manaus) that are mostly tied to (northern) coffee exports, include Louis Dreyfus Commodities (LDC), Olam Agricola, Sucafina Brasil, BlendCoffee, and Neumann Kaffee Gruppe (NKG) Stockler (9). These coffee traders, that are often also the major coffee importers in Europe, may not be able to achieve negligible risk in their due diligence efforts under the EUDR when buying robusta coffee from Rondônia. Potentially indirectly from this specific farm through various warehouses and cooperatives, such as the warehouses presented above, or the Cafeicultores Associados da Região de Matas de Rondônia (Caferon) cooperative, that represents 10,400 coffee growers in the region, reportedly selling coffee to buyers in South America, Asia and Europe (10).

- (1) EU Forest Observatory Global Forest Map, online: <https://forest-observatory.ec.europa.eu/forest>, viewed in July 2025.
- (2) Embrapa (2024), Levantamento e mapeamento do uso e cobertura da terra com ênfase nas áreas cafeieiras da região das Matas de Rondônia, online: <https://www.embrapa.br/busca-de-publicacoes/-/publicacao/1163784/levantamento-e-mapeamento-do-uso-e-cobertura-da-terra-com-ênfase-nas-areas-cafeieiras-da-região-das-matas-de-rondonia>, viewed in 6/2025.
- (3) Mapbiomas Alerta, online: <https://plataforma.alerta.mapbiomas.org/imovel/RO-1100015-E69095ED2D27422DB247DA96FE4BD0D1>, viewed in July 2025.
- (4) SNCR (2025), online: <https://snrc.serpro.gov.br/>, viewed in July 2025.
- (5) CAR Rondônia, online: <http://car.sedam.ro.gov.br/#/site/consultar>, viewed in July 2025.
- (6) Animal Transit Data (GTA), viewed in July 2025.
- (7) Rondônia State Secretariat for Environmental Development, online: <https://geoportal.sedam.ro.gov.br/>. Mining permit number: 886289/2021, viewed in July 2025.
- (8) SICARM warehouse data (2025), online: <https://consultaweb.conab.gov.br/consultas/consultaArmazem.do?method=acaoCarregarConsulta>, viewed July 2025.
- (9) Brazilian shipment data 1 January 2021 till 30 November 2023, filtered for HS code 0901 and robusta coffee.
- (10) ANBA 92023) and Revista Cultivar (2024): <https://anba.com.br/en/rondonias-amazon-robusta-coffee-more-and-more-sustainable/> and <https://revistacultivar.com/noticias/estudo-comprova-a-sustentabilidade-do-cafe-da-região-das-matas-de-rondonia>, viewed in July 2025.



# Cameroun Vert (CamVert)

**Location:** Océan, Campo (Cameroon)

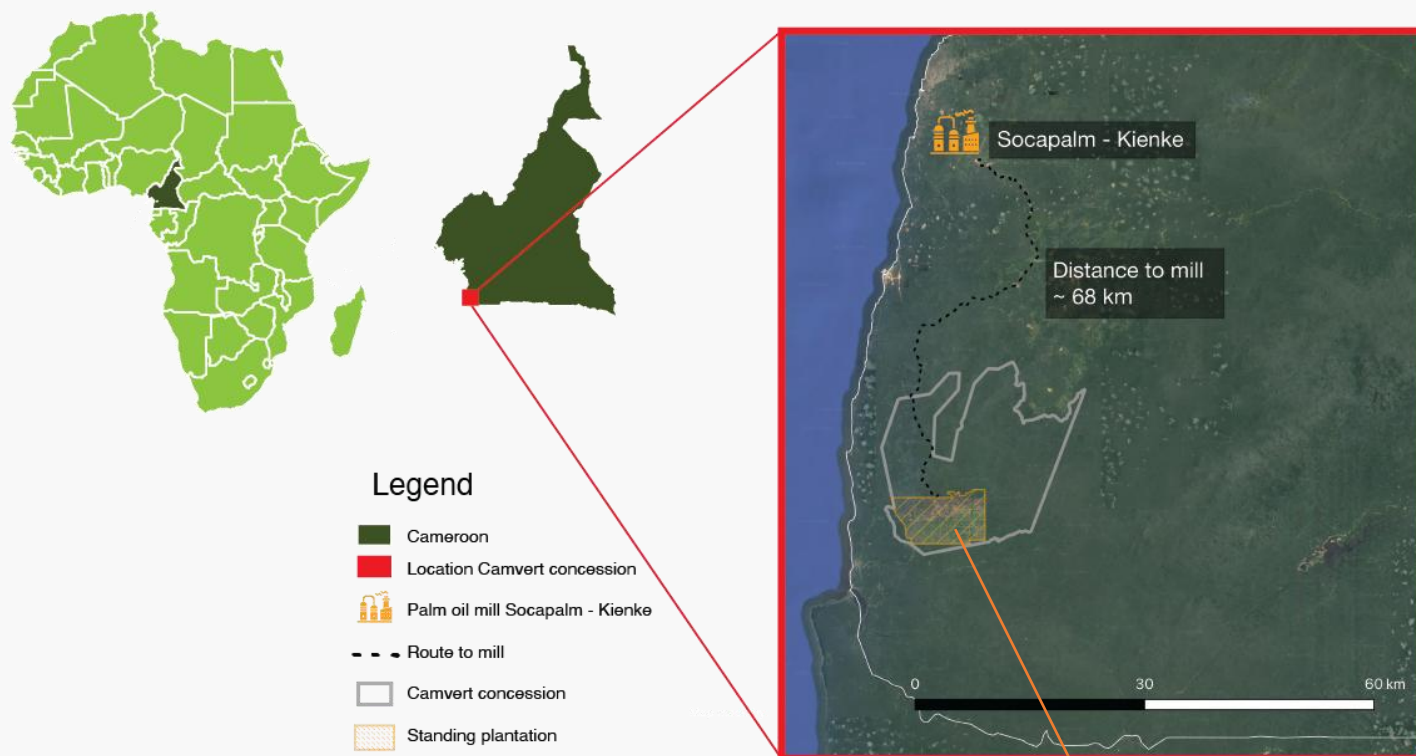
**Biome:** Tropical Rainforest

**Area property (ha):** 60,674 ha (40,032 ha without 'reserved' southern part of concession)

**Coordinates:** 2.4333, 9.9335

Cleared Area		
<b>6,890</b>	<b>hectares</b>	<b>Period clearance:</b> April 2020 and April 2025
		<b>Type of vegetation:</b> Dense Moist Forest

**Imagery:** The grey outlined polygon shows the concession area of CamVert. The orange polygon within demonstrates the oil palm plantation. The top images illustrate the location of the concession and the route from the plantation to the closest industrial palm oil mill, Kienke, from Socfin's subsidiary Socapalm. The bottom three pictures demonstrate the phased clearing of the plantation between June 2020 and April 2025. There is a gap between December 2019 and June 2020 in the available cloud-free Planet satellite data, therefore, the clearing could have started earlier than June 2020. There seem to be clearing signs starting in April 2020 (Sentinel-2 L2A satellite), and there are reports (e.g. source 5 on page 17) on clearing of forest areas that had already started in September 2019 for the nursery.



**Source:** AidEnvironment, based on Google satellite imagery, and data from the Ministère des Forêts et de la Faune (MINFOF), polygon based on visual deforestation in Planet Labs. PBC. (2025, March 2025), background aerial image from Google et al. (2025), route created using Google Maps (2025).



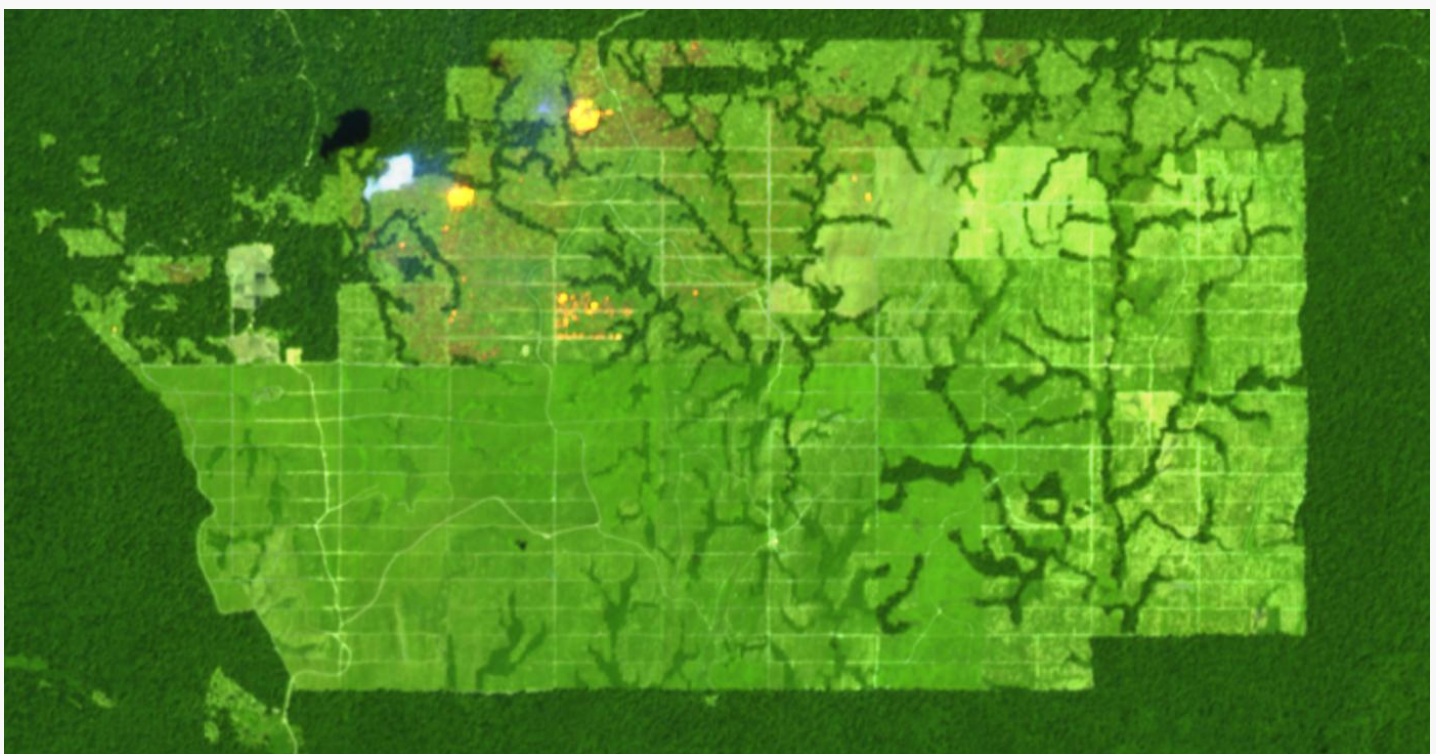
**Picture:** Screenshots of the deforestation in the Camvert concession between 2020 and 2025.

Source: Planet Labs, website assessed in June 2025.



# Cameroun Vert (CamVert)

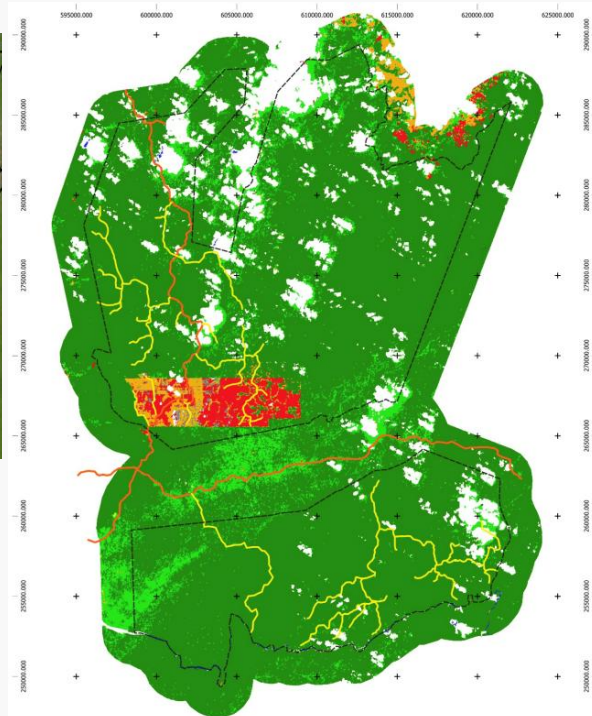
**Imagery:** The two (processed) images below visualise the occurrence of active, man-made fires in the CamVert concession on 31 January 2023, as part of the clearing and land preparation process.



**Source:** AidEnvironment, based on Copernicus Browser 2025.



# Cameroun Vert (CamVert)

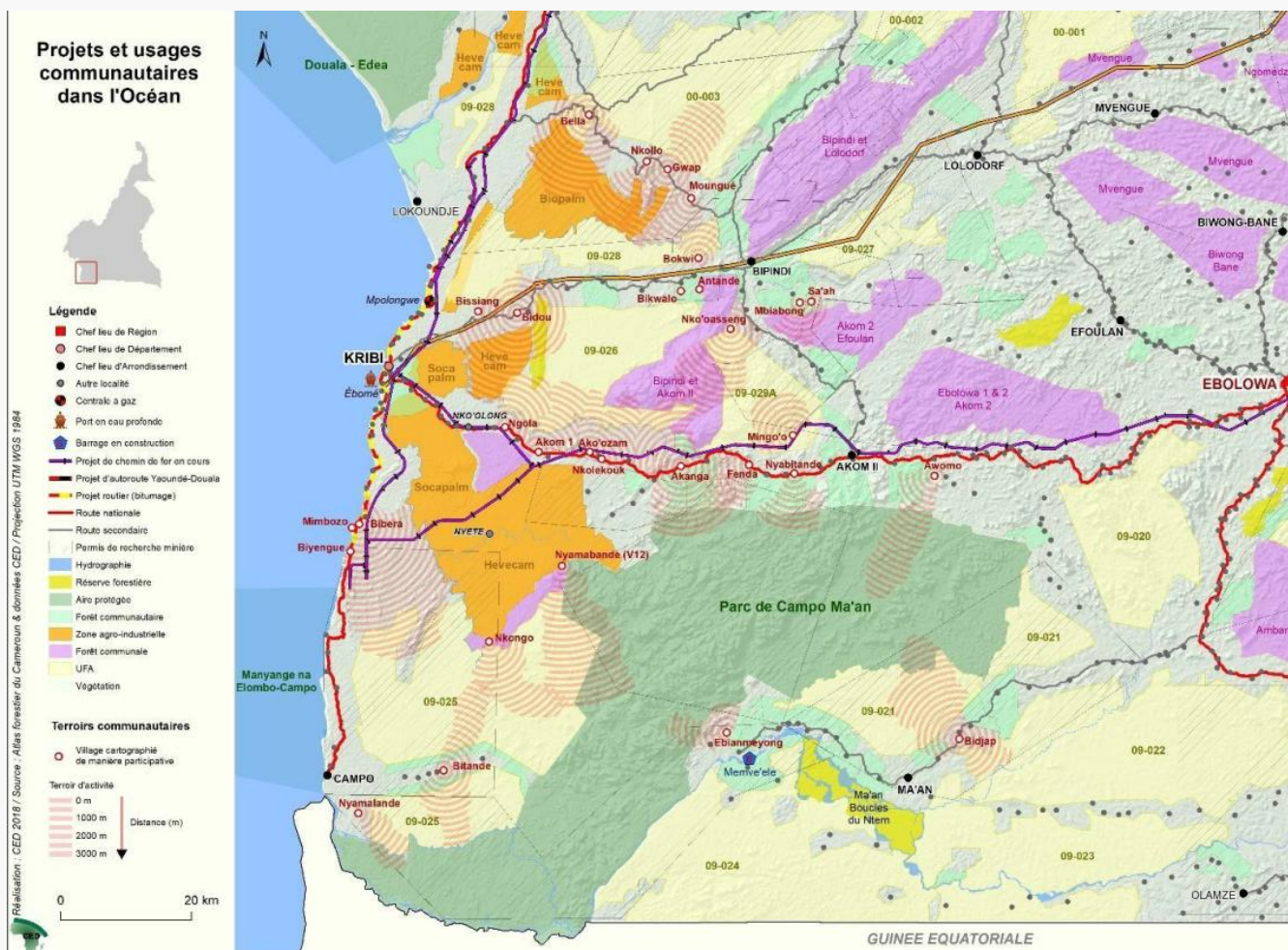


Maps above and at bottom visualise the presence of indigenous areas and local communities adjacent to the CamVert cleared zone for oil palm, clearly demonstrating the need for consultation and FPIC.

**Top map left:** CamVert cleared zone (shaded in red) and location of local communities (green dots), community forest (purple polygons) and community land tenure (red polygons). [Source:](#) Greenpeace and EIA, 2021.

**Map:** Land cover in CamVert concession (in red/orange), indicating significant dense forest (dark green) and open/disturbed forest (light green). [Source:](#) CED Cameroon, Milieudéfense & Landscape Matters (2023).

**Bottom map:** Bagyeli community land use zones (red-lined areas) next to Campo Ma'an National Park. [Source:](#) CED Cameroon, 2018 in FPP UN CERD submission.





# Cameroun Vert (CamVert)

Agricultural activity since deforestation: oil palm plantation (April 2024)



Imagery: CamVert concession in Cameroon, situation in April 2024, demonstrating oil palm plantations after initial clearing of the area since April 2020. Coordinates: 2.42743, 9.89304. Source: ©2026 Airbus

# Cameroun Vert (CamVert)



## Ownership

<b>CamVert ownership</b>	Main shareholder of CamVert is co-founder <b>Aboubakar Al-Fathi</b> (75% of shares). <b>Mahmoud Mourtada</b> , co-founder and managing director, holds 25% of the shares and supervises CamVert's activities. Finally, <b>Mamoudou Bobbo</b> , chief manager officer, coordinates and carries out agricultural activities in Campo (1).
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## Case description

Between April/June 2020 and April 2025, Cameroun Vert (CamVert) cleared 6,890 ha of native vegetation on the border of Campo-Ma'an National Park in southern Cameroon for planting oil palm plantations in the total concession area of 60,674 ha (40,032 ha without 'reserved' southern part of the concession) (2). In November 2019, Cameroon's Prime Minister Joseph Dion Ngute has declassified Forest Management Unit- *FMU 09 025*, to allow for large-scale agricultural production. In 2020, 2,500 hectares of the declassified part of FMU 09 025 were authorised for exploitation to the benefit of the CamVert project (3). Ongoing clearing is expected. The process of allocating logging rights for the forest conversion was reportedly flawed (4). A detailed 2023 analysis of the cleared vegetation type in the CamVert concession (5), reveals that given the high percent of continuous Dense Forest in the concession, at least 53% of the CamVert concession is designated as High Priority Patches (HPP) under the HCV patch type system. A total of 2,245 ha (33%) of the cleared area is classified as 'forest' under the European Regulation on Deforestation-free products (EUDR) (6), but a visual correction on the (delayed) EU Forest Observatory Map demonstrates that in reality 4,842 ha (70%) of the cleared area can be classified as forest by June 2025 (7).

Impacts of the CamVert project on local communities and indigenous peoples in the concession have been widely documented (8) and cumulated in a formal complaint by the Forest Peoples Programme (FPP) at the UN CERD Committee in March 2023 (9). FPP raises concerns that "the customary lands of multiple Bagyeli communities in the Océan department of Cameroon are being rapidly deforested to establish a large oil palm plantation, after the government granted Cameroonian company CamVert a provisional concession for such a development." Moreover, "Mvae and Iyasa communities living in the area are also affected and many have expressed their concerns" (9). On 13 December 2024, the CERD Committee stated that "the response from Cameroon government about violations of Bagyeli rights by the CamVert oil palm concession is insufficient" (10). Communities protested multiple times stating the company is violating the agreements on benefits for the community (11).

Any palm oil produce and related palm products from the CamVert concession marketed in Europe from January 2026 runs the risk of being noncompliant with the EUDR, considering the conversion of classified forests in the CamVert concession since the EUDR cut-off date (30 December 2020), as well as the likely impacts on and violations of (FPIC) rights of indigenous peoples and local communities described above. While there are indications of CamVert having performed an FPIC processes, these are likely not executed in a proper way. For example, the chosen representative of the Bagyeli indigenous community can neither read or write in French or English and reportedly did not know what he had signed for (1).

- (1) Infocongo (22 February 2022), *An Opaque Agro-Industry Razes Cameroon's Forests with Impunity*, online: <https://infocongo.org/en/an-opaque-agro-industry-razes-camerouns-forests-with-impunity/>, viewed in June 2025.
- (2) The clearing is confirmed in numerous investigations, including Infocongo (see source 1); [Greenpeace](#) (Camvert, a recurring nightmare) and CED Cameroon and Milieudéfense (see source 5).
- (3) Infocongo (22 February 2022), *An Opaque Agro-Industry Razes Cameroon's Forests with Impunity*, online: <https://infocongo.org/en/an-opaque-agro-industry-razes-camerouns-forests-with-impunity/>, viewed in June 2025.
- (4) *Pers. comm.* CED Cameroon in June 2025.
- (5) Centre pour l'Environnement et le Développement (CED), Milieudéfense & Dr Geoffrey Griffiths (2023). *Mapping the extent and type of deforestation, Campo Ma'an Cameroon*. Online: [https://en.milieudedefense.nl/news/cameroun\\_report\\_forest-clearing-CamVert\\_january-2023\\_final-report\\_for-publication.pdf/@@download/file/Cameroun%20report%20forest%20clearing%20CamVert.pdf](https://en.milieudedefense.nl/news/cameroun_report_forest-clearing-CamVert_january-2023_final-report_for-publication.pdf/@@download/file/Cameroun%20report%20forest%20clearing%20CamVert.pdf), viewed in June 2025.
- (6) EU Forest Observatory Map, online: <https://forest-observatory.ec.europa.eu/forest/rmap>, viewed in June 2025.
- (7) Richter, J., Goldman, E., Harris, N., Gibbs, D., Rose, M., Peyer, S., Richardson, S., & Velappan, H. (2024). Spatial Database of Planted Trees (SDPT Version 2.0) [Data set]. ResearchGate. [https://www.researchgate.net/publication/378725480\\_Spatial\\_Database\\_of\\_Planted\\_Trees\\_SDPT\\_Version\\_2\\_0](https://www.researchgate.net/publication/378725480_Spatial_Database_of_Planted_Trees_SDPT_Version_2_0)
- (8) See references summarized here, e.g. of Greenpeace, Infocongo, Milieudéfense.
- (9) Forest Peoples Programme (2023). Submission to CERD, online: <https://www.forestpeoples.org/publications-resources/reports/article/submission-to-cerd-concerning-the-grant-of-a-palm-oil-concession-to-camvert-and-associated-rapid-deforestation-on-the-customary-forest-lands-of-bagyeli-communities-in-cameroon/>, viewed in June 2025.
- (10) <https://www.forestpeoples.org/publications-resources/news/article/response-from-cameroon-government-about-violations-of-bagyeli-rights-by-the-camvert-oil-palm-concession-is-insufficient-according-to-un-cerd-committee/>, viewed in June 2025.
- (11) Greenpeace (24 January 2025). Cameroon: In Campo, local residents express their annoyance with Camvert, online: <https://www.greenpeace.org/africa/en/press/56940/cameroon-in-campo-local-residents-express-their-annoyance-with-camvert/>, viewed in June 2025.

## Cameroun Vert (CamVert)



### Business relationships

#### Potential buyers:

**Direct:** Socfin  
Socapalm - Kienke

**Indirect:** LDC, VVF,  
Nestlé, L'Oréal

**Company responses:** In response to a draft version of this case study shared with Socfin's subsidiary **Socapalm** in June 2025, the company stated that (14 July 2025) "*there is no legal, structural, or commercial link between CamVert and Socapalm*" and that "*Socapalm has no supply agreement with CamVert and doesn't intend to establish one in the future*". Socapalm's full response can be read [here](#). CamVert did not respond to repeated requests for feedback.

### Case description

After land clearance in 2019 and 2020, CamVert started planting its first oil palm trees (1). Considering the average time for producing palm oil from a new plantation (3-4 years), at the time of reporting (2025), it is expected that CamVert has or will sell its first palm oil produce from the concession soon. Based on proximity (see maps first page), nearby palm oil mills of Socfin's Société Camerounaise de Palmeraies (Socapalm), notably the RSPO-certified Kienké palm oil mill (2) will be a potential recipient of this palm oil produce. Considering the road infrastructure, there is only 68 km between the concession and the Kienke mill, and the mill is the only industrial palm oil mill in the area that also sources outside of its own Socapalm plantations. It is estimated by palm oil companies that mills will mainly source from plantations within an approximate 50-70 km radius around the mills due to the oil palm fruits' perishability (though this may vary depending on available infrastructure, such as road density and quality). Palm oil buyers of the Socapalm Kienke mill are therefore unlikely to achieve negligible risk in their due diligence efforts under the EUDR when buying palm oil products from Kienke mill. Socapalm has denied the existence of any commercial relationship with CamVert (see response above).

While there is already significant controversy around the CamVert concession, also Socapalm and its European parent company Socfin are reportedly linked to land grabbing, illegitimate RSPO certification, threats and intimidation, forced labour, deforestation, and pollution (3), and therefore also risking noncompliance with the EUDR. Socfin Group, a Luxembourg-based holding company involved in oil palm and rubber production in Asia and Africa, which consists of major financial holdings Socfin, Socfinaf, and Socfinasia, is 39 percent held by the French group Bolloré and 54 percent held by the Belgian businessman Hubert Fabri. Socfin was a European agribusiness company during the colonial period and has largely expanded its plantation territory through privatization of African state plantation companies (4).

Buyers of Socfin's Socapalm mills in Cameroon, also with specific reference to Socapalm's Kienke mill, include Louis Dreyfus Commodities (LDC) in 2024 (5) and VVF India (producer of fatty acids) in 2024 (6). Nestlé sourced from Socapalm's mill in 2021 (7). Buyers indicating that Cameroonian palm oil mills are part of their suppliers, therefore likely also including Socapalm, but without specifying the mills, include L'Oréal (8) and Nestlé in 2023 (9).

Shipment data samples do not reveal (yet) any direct palm oil exports from CamVert to date. However, indirect supply via Socfin mills might follow existing trading routes. For instance, Socfin's Safacam (rubber and palm oil) company has, apart from significant exports of rubber to several major tyre manufacturers (Michelin, Goodyear, Continental, Nokian, Polsaros, MRF) in Europe, also directly exported palm kernel oil (HS 151329) from Cameroon to Golden Agri Resources in the Netherlands (dated 2024-10-01, at a total value of USD 3 million); to LDC in Spain (dated 2024-03-06; at a total value of USD 1.0 million); and to Sogescol in the Netherlands (dated 2022-03-25; at a total value of USD 4 million) (10). Sogescol is Socfin's legally registered company in Switzerland marketing rubber and palm oil.

- (1) Infocongo (22 February 2022), *An Opaque Agro-industry Razes Cameroon's Forests with Impunity*, online: <https://infocongo.org/en/an-opaque-agro-industry-razes-camerouns-forests-with-impunity/>, viewed in June 2025.
- (2) Socapalm Kienke RSPO certification, online: [https://www.socfin.com/wp-content/uploads/2023/02/2028-01-17\\_Socapalm\\_Kienke\\_RSPO\\_2023-01-18.pdf](https://www.socfin.com/wp-content/uploads/2023/02/2028-01-17_Socapalm_Kienke_RSPO_2023-01-18.pdf) and GeorSPO, online: <https://my.gfw-mapbuilder.org/v1.latest>, viewed in June 2025 (PDF report available upon request).
- (3) Small selection of sources on Socfin's reported misconduct: [Chain Reaction Research](#); [Business and Human Rights Resource Centre](#); [Mongabay 1](#); [Mongabay 2](#); [Milieudefensie](#); [Greenpeace](#); [Fern](#); [Volkskrant](#); [Earthworm](#); [Sherpa](#).
- (4) Chain Reaction Research (2022). *African Oil Palm Expansion Slows, Reputation Risks Remain for FMCGs*, online: <https://aidenvironment.org/wp-content/uploads/2024/02/African-Oil-Palm-Expansion-Slows-Reputation-Risks-Remain-for-FMCGs.pdf>.
- (5) LDC Palm Oil Mill List 2024-H1, online: <https://www ldc.com/wp-content/uploads/Palm-Traceability-to-Mill-List-H1-2024.pdf>, viewed in June 2025.
- (6) VVF India Palm Oil Mill List 2024, online: <https://vfvftd.com/PDF/sustainability/Palm-Mill-List-2024.pdf>, viewed in June 2025
- (7) Nestlé palm oil mill list 2021 (PDF file available upon request).
- (8) L'Oréal mill list 2022, online: <https://www.loreal.com/-/media/project/loreal/brand-sites/corp/master/lcorp/3-commitments/sharing-beauty-with-all/list-of-mills-potentially-connected-to-loreal-palm-supply-chain-2022-v1.pdf>, viewed in June 2025.
- (9) Nestlé CDP Forests 2023, online: <https://www.nestle.com/sites/default/files/2024-11/cdp-nestle-answers-forests-2023.pdf>, viewed in June 2025.
- (10) Cameroon export data for palm oil and palm oil products (HS codes: 1511, 120710, 151321, 151329, 230660, 382319) to Europe between January 2022 and March 2025, filtered for companies affiliated with Socfin in Cameroon (e.g. Socapalm, Safacam).

# Cattle case (September 2023)



## Fazenda Promissão III / Fazenda São José

### Property

Fazenda Promissão III (SIGEF) / Fazenda São José, Santa Ana, Santa Catarina (CAR, not validated)

Porto Alegre do Norte, Mato Grosso

Amazon Biome

CAR: MT-5106778-4B9DEBBA7D8940DEBEE5E9B880036318, MT-5103353-603FFC2E76C0493CA9921081438A5EFA (Confresa - MT)

SIGEF/SNCI: 9011801044691

Area property (ha): 2,920

Coordinates property: -10.56059, -52.03118

### Cleared Area

Coordinates clearance:

-10.5596, -52.0346

438 hectares  
96,681 tons of CO<sub>2</sub>  
65 fires alerts

period clearance: Jan to Aug 2023

Inside Forest Code's protected areas:

No

Type of vegetation:

Forested Savanna

Priority for Biodiversity Conservation:

Extremely high

Conservation area(s) (overlapping or bordering):

-

Indigenous Territories (overlapping or bordering):

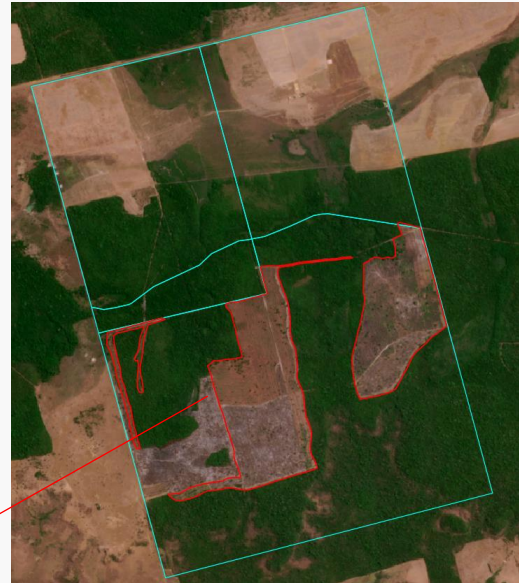
-

January 2023



Source: Imagery ©2023 Planet Labs Inc.

August 2023



Source: Imagery ©2023 Planet Labs Inc.

**Imagery:**  
limits of the property (green),  
limits of the cleared area (red)



Source: European Union - EO Browser Copernicus Sentinel data 2023

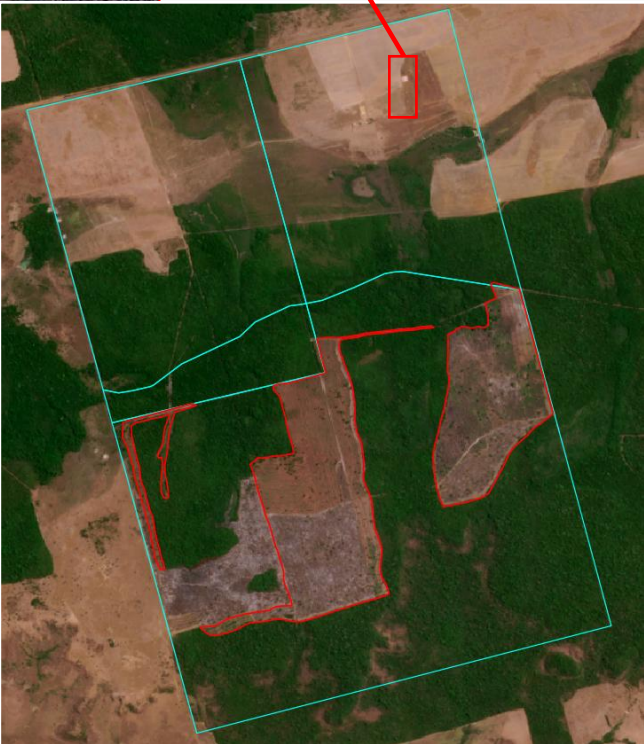
Fires June 2023

# Cattle case (September 2023)



## Fazenda Promissão III / Fazenda São José

### Agricultural activity since deforestation: cattle production (July 2024)



Imagery: Fazenda Promissão III / Fazenda São José, situation in July 2024, demonstrating cattle production after clearing of the area between January to August 2023.

Coordinates: -10.52209, -52.02731.

Notes: While the bovine animals (white 'dots') in the photo are not positioned in the cleared area in this satellite photo, the cattle herd is clearly located inside the farm polygon boundaries.

Source: @2026 Airbus; Pasture area confirmed by MapBiomias Brasil - Collection 10.

# Cattle case (September 2023)





## Fazenda Promissão III / Fazenda São José

Environmental fines and embargoes			
<b>Embargoes:</b>	Yes	4 embargoed areas by SEMA-MT in Fazenda Santa Catarina (linked to Everaldo), for illegal clearance of native vegetation in 2021	
<b>Environmental fines:</b>	Yes	1 Environmental fine from SEMA-MT for illegal clearance of 58 ha of native vegetation in Fazenda Santa Catarina (linked to Everaldo) in 2021	unknown
Ownership and other linked properties			
<b>Ownership:</b>	Sarah de Oliveira, Marcos Antonio Boaventura (SIGEF) / Everaldo Peres Domingues Junior, Ana Rosaria Medeiros Peres (CAR, not validated)		
<b>Company group:</b>	Linked to Everaldo and Ana Rosaria: Coali Indústria de Alimentos (Terezópolis de Goiás - GO)		
<b>Linked properties:</b>	2 linked properties to Everaldo and Ana Rosaria, totalling at least 3,320 ha. Bordering property in Porto Alegre do Norte (MT): Fazenda Nossa Senhora Aparecida (3,320 ha). In São Félix do Xingu (PA): Fazenda Santo Antônio (unknown area)		
Supply chain links			
<b>Main Commodities</b>	Beef and Soy		
<b>Confirmed supply chain link, level of certainty, and soy trader/ beef processor</b>	Yes	High / Medium	Bunge / JBS
<b>Companies' reply</b>	<p><b>Amaggi [potential link removed]:</b> "No commercial relationship was identified between AMAGGI with the mentioned property after the deforestation."</p> <p><b>Louis Dreyfus Commodities [potential link removed]:</b> "In 2023, LDC did not receive products from the listed producers and CARs."</p>		
<b>Soy</b>	<b>Warehouses (50 km radius)</b>	11 warehouses including 1 from Louis Dreyfus and 1 from Amaggi	
	<b>Supply chain links &amp; details:</b>	Fazenda Santa Catarina I and II, and Fazenda II Irmãos II, supplied soy to Amaggi in São Félix do Xingu (MT) in 2018, to Louis Dreyfus in Confresa (MT) in 2019, and to Agrícola Alvorada (retailed to Bunge) in Confresa (MT) in 2020	
<b>Beef</b>	<b>Slaughterhouses (sourcing from the municipality)</b>	A linked property to Everaldo, Fazenda Promissão (Confresa - MT), indirectly supplied JBS (Confresa - MT) in 2018, through Fazenda Brahma (São José do Xingu - MT), operated by Ivonei Vilela Medeiros. A linked (unknown) property to Ana Rosaria in Confresa (MT) supplied JBS (Juara - MT) in 2019 through an unknown property operated by Robisson Eugênio Dorner in Ipiranga do Norte (MT)	
	<b>Supply chain links &amp; details:</b>	A linked or the same property of Everaldo, Fazenda São José II Irmaos IV (Porto Alegre Do Norte - MT), indirectly supplied JBS (Confresa - MT) in 2024, through Fazenda Santa Ana II Irmaos I (similar ownership) in Confresa (MT).	
<b>Other supply chain links and details:</b>		-	
General comments			
<p>Fazenda São José has active authorizations for forest exploitation and clearance of 951 ha of native vegetation, both valid until January 2025 (1). Nevertheless, also so called 'legal clearing' is considered illegal under the EUDR. Everaldo Domingues Peres (without "Junior"), probably a relative to Everaldo, is secretary of Coagrill, a cooperative of crop producers in Unaí (MG) (2). Besides Fazenda Santa Catarina I e II, Fazenda II irmãos II e III (750 ha) and Fazenda São José (1,588 ha), the Peres family (Everaldo Peres Domingues Junior, Ana Rosaria Medeiros Peres, Ivete Vilela Medeiros Peres and Everaldo Peres Domingues) declared the CARs of four other properties bordering each other, totaling 5,570 ha: Fazenda Nossa Senhora da Abadia (1,180 ha), Fazenda Nossa Senhora Aparecida - Matrícula 17.223 (961 ha), Fazenda Promissão (1,076 ha), and Fazenda Nossa Senhora do Carmo (14,9 ha) (1). Under the name of Fazenda São José II Irmaos IV (Porto Alegre Do Norte - MT), which is likely the same farm under investigation, Everaldo Domingues Peres Junior indirectly supplied JBS (Confresa - MT) in 2024, through Fazenda Santa Ana II Irmaos I (similar ownership) in Confresa (MT) (3).</p>			
<p>(1) <a href="https://geoportal.sema.mt.gov.br/">https://geoportal.sema.mt.gov.br/</a>                  (2) <a href="https://coagrill.coop.br/wp-content/uploads/2021/03/RELATORIO-ANUAL-COAGRILL-2020-WEB.pdf">https://coagrill.coop.br/wp-content/uploads/2021/03/RELATORIO-ANUAL-COAGRILL-2020-WEB.pdf</a>                  (3) Animal Transit Data (GTA).</p>			

# Cattle case (November 2022)

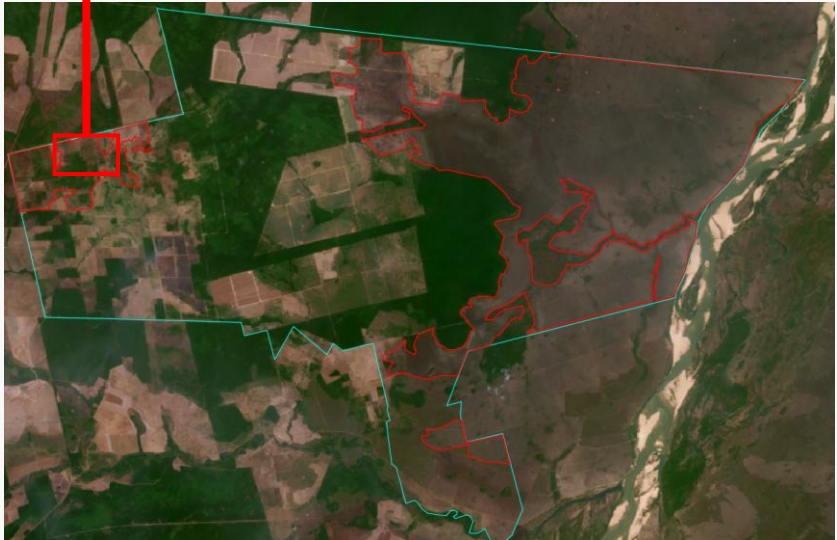
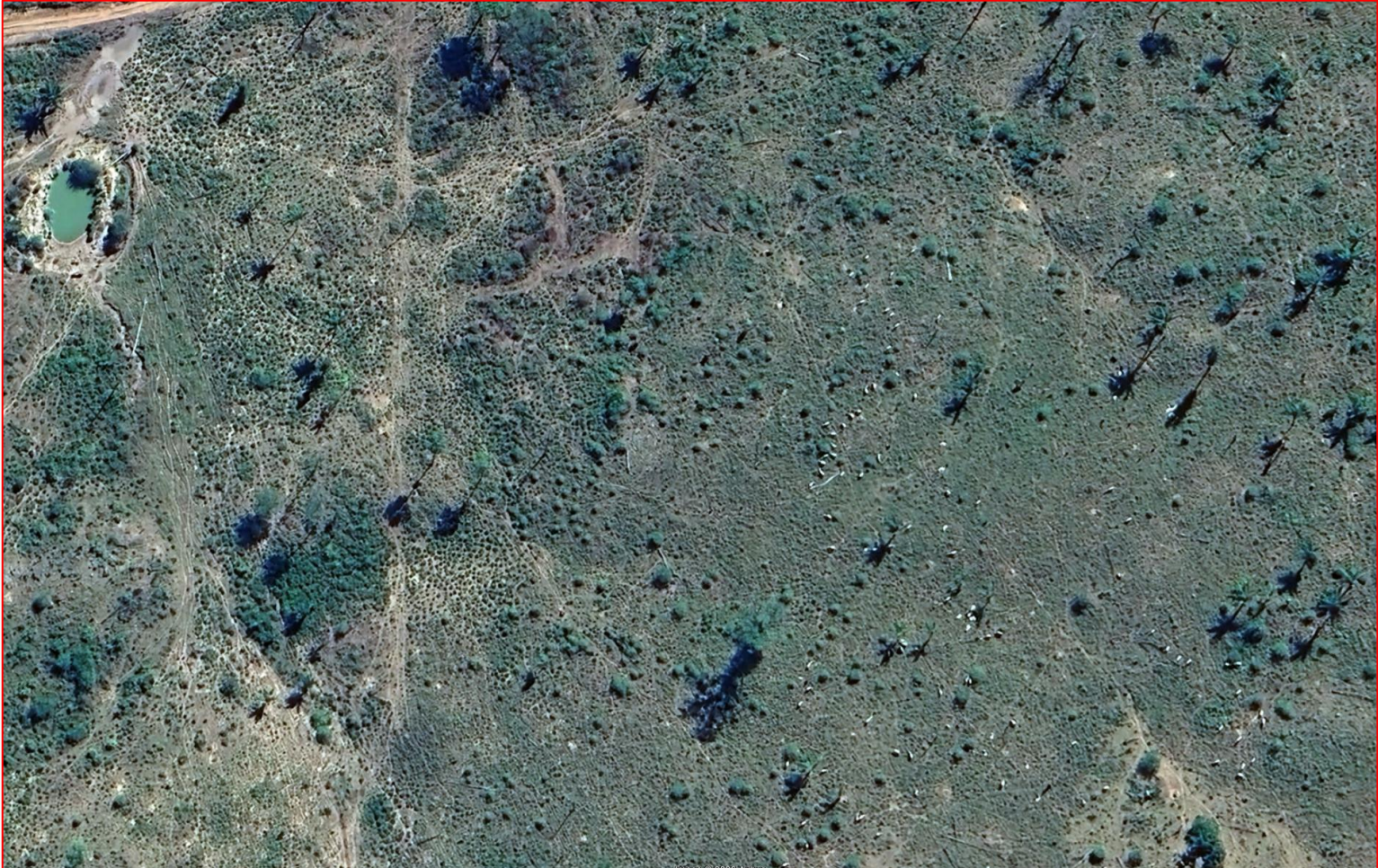


## Fazenda São Sebastião

Property	
<b>Fazenda São Sebastião</b>	
Santa Terezinha, Mato Grosso	<b>Amazon biome</b>
<b>CAR:</b> MT-5107776-DC5A97A8DE7047989E1B78D058D15B76	<b>SIGEF/SNCI:</b> 9010593003068
<b>Area property (ha):</b> 47,254	<b>Coordinates property:</b> -50.40187, -9.89001
Cleared Area	
<b>Coordinates clearance:</b>	-50.31127, -9.86188
<b>17,186</b> Hectares	<b>period clearance:</b> September 2022
<b>429</b> fires alerts	
<b>Inside Forest Code's protected areas:</b> Yes	14636 ha inside declared Legal Reserve and APP
<b>Type of vegetation:</b> Ombrophilous Open Forest	<b>Priority for Biodiversity Conservation:</b> Extremely high
<b>Conservation area(s) (overlapping or bordering):</b>	Bordering Parque Estadual do Cantão
<b>Indigenous Territories (overlapping or bordering):</b>	Bordering the Indigenous Territory Utaria Wyhyna/Iròdu Iràna
<p><b>Imagery:</b> limits of the property (blue) limits of the cleared area (red)</p> <p>September 2022</p>  <p style="font-size: small;">Source: Imagery ©2022 Planet Labs Inc.</p>	
<p><b>Fires</b></p> <p>02<sup>nd</sup> September 2022</p>	
 <p style="font-size: small;">Source: European Union - EO Browser Copernicus Sentinel data 2022</p>	



Agricultural activity since deforestation: cattle production (June 2024)



Imagery: Fazenda São Sebastião, situation in June 2024, demonstrating cattle production after clearing of the area in September 2022.

Coordinates: -9.86287, -50.54713.

Notes: Cattle (white 'dots') are walking around in the reported burned area in September 2022, inside the farm polygon boundaries.

Source: @2026 Airbus; Pasture area confirmed by MapBiomass Brasil - Collection 10.

# Cattle case (November 2022)



## Fazenda São Sebastião

### Environmental fines and embargoes

<b>Embargoes:</b>	Yes	5 embargos for illegal clearance of 2,015 ha of native vegetation in 2020 and 2021
<b>Environmental fines:</b>	Yes	1 environmental fine for economic activities in an embargoed area in September 2022
		BRL 510,000

### Ownership and other linked properties

<b>Ownership:</b>	Agropecuária São Sebastião do Araguaia
<b>Company group:</b>	Agropecuária São Sebastião do Araguaia, Itapurá Agropecuária
<b>Linked properties:</b>	No other properties found

### Supply chain links

<b>Main Commodities</b>	Beef and Soy		
<b>Confirmed supply chain link, level of certainty, and soy trader/ beef processor</b>	Yes	High / Medium / Low	JBS / Minerva, Marfrig / Viterra
<b>Companies' reply</b>	The indirect link to Minerva was <b>maintained</b> . Although Minerva declared that " <i>Fazenda São Sebastião does not have any commercial relationship with the Company</i> ", regarding the property owned by André Zucato (Pedra Preta - MT), they declared that " <i>commercialization has taken place, and the properties comply based on the criteria of the Company's socio-environmental monitoring protocols</i> ". The property owned by André Zucato received cattle from Fazenda São Sebastião.		
<b>Soy</b>	<b>Main exporters (municipality)</b>	Viterra (100%)	
	<b>Warehouses (50 km radius)</b>	3 warehouses owned by individuals and local storage companies/cooperatives	
	<b>Supply chain links &amp; details:</b>	The property produced soy in 2021	
<b>Beef</b>	<b>Main traders (municipality)</b>	JBS (67%), Marfrig (11%), Minerva (5%), others (17%)	
	<b>Slaughterhouses (sourcing from the municipality)</b>	6 different slaughterhouses sourced cattle from Porto dos Gaúchos (MT) in 2021, e.g.: 3 owned by JBS (Confresa, Água Boa, and Barra do Garças - MT), 1 by Marfrig (Nova Xavantina - MT)	
	<b>Supply chain links &amp; details:</b>	Directly supplied cattle to 1 JBS slaughterhouse (Confresa - MT) in 2018 and 2019. Indirectly supplied 3 JBS slaughterhouses (Barra do Garças, Confresa, and Pedra Preta - MT) in 2018 and 2019 through Fazenda Rancho dos Ipês (Confresa - MT), Fazenda Matagominas (Vila Rica - MT), Fazenda Santo Antônio do Jarigue (Pedra Preta - MT), Fazenda Beleza (Vila Rica - MT), Fazenda Reata (Barra do Garças-MT), and a property owned by André de Moraes Zucato (Pedra Preta - MT). The farm owned by André Zucato also supplied Minerva's slaughterhouses (Várzea Grande and Paranatinga-MT) in 2019. Fazenda São Sebastião also indirectly supplied Marfrig (Paranatinga-MT) in 2018 through Fazenda Santo Antônio do Jarigue (Pedra Preta - MT).	
<b>Other supply chain links and details:</b>			

### General comments

In 2021, the company Agropecuária São Sebastião do Araguaia presented a complaint to the public prosecutor's office alleging that the Legal Reserves of the properties (including Fazenda São Sebastião) are being invaded and degraded by external groups (1). The properties are being claimed by smallholders' groups since 2008. The association representing the smallholders claims that a private armed security company is threatening the families to remove them from the area (2). The CAR covering the area was declared by the linked company Itapurá Agropecuária in 2017 and is still under analysis (3). The company Agropecuária São Sebastião do Araguaia was incorporated by Itapurá Agropecuária in 2021 and is owned by WLM Participações e Comércio de Máquinas e Veículos, a company listed on the Brazilian stock exchange (4).

(1) <https://www.agenciadanoticia.com.br/noticias/exibir.asp?id=107929&noticia=8203agropecuaria-denuncia-invasao-e-extracao-ilegal-de-madeira-em-area-de-preservacao-em-santa-terezinha>

(2) Notícia de Fato - Federal Prosecutor Office - undisclosed info

(3) <https://geoportal.sema.mt.gov.br/#/>

(4) <http://vipfiles.valor.com.br/BDEmpresas/623090.pdf>

# Cattle case (August 2022)



## Lote 35, Setor D (Fazenda Lyra)

Property	
Lote 35, Setor D (Fazenda Lyra)	
São Félix do Xingu, Pará	Amazon biome
CAR: PA-1507300- DD012978C6E64CE78342840 DF3152F55	SIGEF/SNCI:440240083116
Area property (ha): 2,970	Coordinates property: -7.05762, -52.80880
Cleared Area	
Coordinates clearance:	-52.81291, -7.01932
666 Hectares	period clearance: Jan to Jun 2022
56 fires alerts	
Inside Forest Code's protected areas: Yes	666ha inside declared Legal Reserve and APP
Type of vegetation: Ombrophilous Open and Dense Forest	Priority for Biodiversity Conservation: No
Conservation area(s) (overlapping or bordering):	Área de Proteção Ambiental Triunfo do Xingu
Indigenous Territories (overlapping or bordering):	-

**Before & After Imagery:** limits of the property (blue) limits of the cleared area (red)

Jan 2022



Source: Imagery ©2022 Planet Labs Inc.

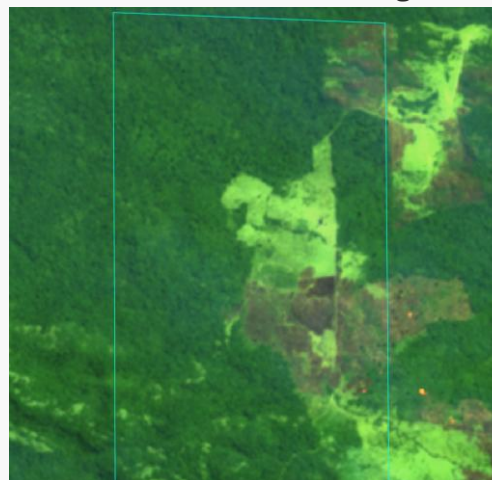
June 2022



Source: Imagery ©2022 Planet Labs Inc.

Fires

Aug 2021



Source: European Union, contains modified 2021, processed with EO Browser Copernicus Sentinel data

## Cattle case (August 2022)

Lote 35, Setor D (Fazenda Lyra)



Agricultural activity since deforestation: cattle production (September 2023)



Imagery: Fazenda Lote 35, Setor D (Fazenda Lyra) in September 2023, demonstrating cattle walking around in the farm polygon boundaries after clearing of the farm between January and June 2022.

Coordinates: -7.03282, -52.80222.

Notes: Cattle (white 'dots') are walking around inside the farm polygon boundaries. Source: @2026 Airbus; Pasture area confirmed by MapBiomias Brasil – Collection 10.

# Cattle case (August 2022)

## Lote 35, Setor D (Fazenda Lyra)



Environmental fines and embargoes				
<b>Embargoes:</b>	Yes (other links)	31 environmental embargoes for non-authorized clearance of native vegetation between 2008 and 2018 in linked properties in Pará		
<b>Environmental fines:</b>	Yes (other links)	27 environmental fines in linked properties between 2009 and 2018 in Pará	BRL 83 million	
Ownership and other linked properties				
<b>Ownership:</b>	Heitor Lyra (SIGEF) / Agropecuária Santa Barbara Xinguara (AgroSB) (CAR)			
<b>Company group:</b>	Agropecuária Santa Barbara Xinguara (AgroSB) / Eldorado do Xingu / Opportunity Fund			
<b>Linked properties:</b>	22 other properties in Pará, totaling 206,761 ha			
Supply chain links				
<b>Main Commodities</b>		Beef		
<b>Confirmed supply chain link, level of certainty, and soy trader/ beef processor</b>		<b>Yes</b>	<b>High / Medium</b>	<b>JBS / Minerva, Marfrig</b>
<b>Companies' replies</b>		The potential trading link with Minerva was maintained as they stated that the owner is in their suppliers' list even if their system does not link it to the property: "Agropecuária Santa Barbara Xinguara [AgroSB], is registered in the Minerva system, but is not associated with the property"		
<b>Soy</b>	<b>Main exporters</b> (municipality)	[Domestic Consumption (100%)]		
	<b>Warehouses</b> (50 km radius)	No warehouses within 100 km		
	<b>Supply chain links &amp; details:</b>	-		
<b>Beef</b>	<b>Main traders</b> (municipality)	Frigol (42%), Marfrig (35%), JBS (9%)		
	<b>Slaughterhouses</b> (sourcing from the municipality)	25 different slaughterhouses sourced cattle from São Félix do Xingu (PA) in 2019, e.g.: 4 owned by JBS (Santana do Araguaia, Marabá, Tucumã, Redenção, all in PA), 1 by Marfrig (Tucumã - PA)		
	<b>Supply chain links &amp; details:</b>	AgroSB is a direct supplier of JBS. Cluster of AgroSB farms also indirectly supplied cattle to large meatpackers including JBS, Minerva, Frigol, Marfrig and Frigorífico Valêncio between 2018 and 2021		
<b>Other supply chain links and details:</b>		-		
General comments				
<p>Agropecuária Santa Barbara Xinguara (AgroSB) is the self-declared operator of this property, Lote 35 - Setor D (Fazenda Lyra) under alert in the rural environmental registry (CAR) (1). In the SIGEF cadastre system, the property is registered under Heitor Lyra (2). AgroSB, a company involved in cattle, soy, and corn production, is the second largest deforester in Brazil in the last 25 years based on Ibama's environmental fines database, with a BRL 83 million amount in fines in 2009, 2010, 2011 and 2017 (3). The company is the co-owner of six properties named Fazendas Lagoa do Triunfo I, II, III, IV, V, VI (1, 4), totaling 145,000 ha (5) - a conglomerate 20km north from the property under alert. There was continuous deforestation and fire in Lagoa do Triunfo farms in 2019 and 2020, next to significant alleged social and criminal behaviour of the company including slave labor and money laundering (6, 7, 8). In 2012, five workers were rescued from slave labour conditions in a farm controlled by AgroSB (9). AgroSB's cattle supply is directly and indirectly linked to the world's largest meatpackers JBS, Minerva, Frigol, Marfrig and Frigorífico Valêncio (10, 11).</p>				
<p>(1) <a href="http://car.semas.pa.gov.br/#/consulta/mapa">http://car.semas.pa.gov.br/#/consulta/mapa</a>                  (2) <a href="https://sigef.incra.gov.br">https://sigef.incra.gov.br</a>                  (3) <a href="https://theintercept.com/2020/01/31/maiores-desmatadores-amazonia/">https://theintercept.com/2020/01/31/maiores-desmatadores-amazonia/</a>                  (4) <a href="https://agrosb.com.br">https://agrosb.com.br</a>                  (5) <a href="https://www.theguardian.com/environment/2019/jul/02/revealed-amazon-deforestation-driven-global-greed-meat-brazil">https://www.theguardian.com/environment/2019/jul/02/revealed-amazon-deforestation-driven-global-greed-meat-brazil</a>                  (6) <a href="https://www.mightyearth.org/wp-content/uploads/RR-Special-Fires-Brazil-part-22.pdf">https://www.mightyearth.org/wp-content/uploads/RR-Special-Fires-Brazil-part-22.pdf</a>                  (7) <a href="http://www.mightyearth.org/wp-content/uploads/RR_Report_June_2020.pdf">http://www.mightyearth.org/wp-content/uploads/RR_Report_June_2020.pdf</a>                  (8) <a href="http://www.mightyearth.org/wp-content/uploads/Rapid-Response_Soy-and-Cattle_Special-Report_Fires_Sept-2019.pdf">http://www.mightyearth.org/wp-content/uploads/Rapid-Response_Soy-and-Cattle_Special-Report_Fires_Sept-2019.pdf</a>                  (9) <a href="https://reporterbrasil.org.br/2012/04/fazenda-com-escravos-e-controlada-por-familia-de-daniel-dantas/">https://reporterbrasil.org.br/2012/04/fazenda-com-escravos-e-controlada-por-familia-de-daniel-dantas/</a>                  (10) <a href="https://www.theguardian.com/environment/2019/jul/02/revealed-amazon-deforestation-driven-global-greed-meat-brazil">https://www.theguardian.com/environment/2019/jul/02/revealed-amazon-deforestation-driven-global-greed-meat-brazil</a>                  (11) <a href="http://www.mightyearth.org/wp-content/uploads/Rapid-Response_Soy-and-Cattle_Report-6.pdf">http://www.mightyearth.org/wp-content/uploads/Rapid-Response_Soy-and-Cattle_Report-6.pdf</a></p>				

# Soy case (August 2023)

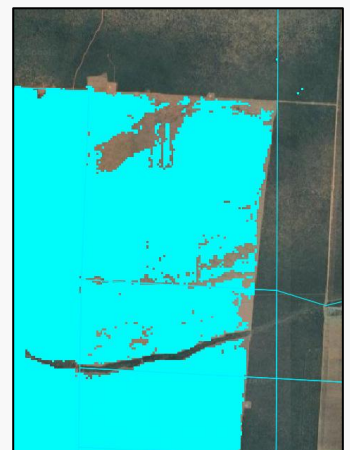


## Fazenda Santa Maria / Santa Maria d'Oeste

Property			
<b>Fazenda Santa Maria / Santa Maria d'Oeste</b>			
Formosa do Rio Preto, Bahia		<b>Cerrado biome</b>	
<b>CAR:</b>	BA-2911105-E52FFB36A55B4D5FA3710146808C5EFE, BA-2911105-8CB3FD1D05DB4C65834DOC84A34A2E14, BA-2911105-6E0B5D652C0B44648FA4C563F5A8F113, BA-2911105-AFE9B923C46B4B379E564F9A9E215EE6	<b>SIGEF/ SNCI:</b>	4321050368896
<b>Area property (ha):</b>	14,120	<b>Coordinates property:</b>	-10.94294, -45.92089
Cleared Area			
<b>Coordinates clearance:</b>		-10.93142, -45.92773	
<b>2,265</b> Hectares		<b>period clearance:</b> Jul 2022 to Jul 28, 2023	
<b>113,197</b> tons of CO <sub>2</sub>			
<b>102</b> fires alerts			
<b>Inside Forest Code's protected areas:</b>	No	- -	
<b>Type of vegetation:</b>	Wooded Savanna	<b>Priority for Biodiversity Conservation:</b>	Extremely high
<b>Conservation area(s) (overlapping or bordering):</b>		Área de Proteção Ambiental do Rio Preto	
<b>Indigenous Territories (overlapping or bordering):</b>		-	
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>July 2022</p> <p>Source: Imagery ©2022 Planet Labs Inc.</p> </div> <div style="width: 45%;"> <p><b>Imagery:</b> limits of the property (blue), limits of the cleared area (red)</p> </div> </div>			
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Fires 20 July 2023</p> <p>Source: European Union - EO Browser Copernicus Sentinel data 2023</p> </div> <div style="width: 45%;"> <p>July 2023</p> <p>Source: Imagery ©2023 Planet Labs Inc.</p> </div> </div>			



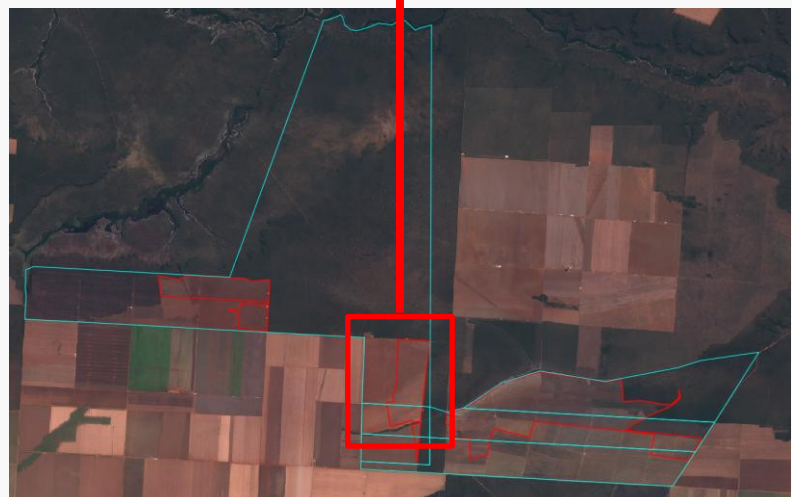
Agricultural activity since deforestation: soy production (June 2023)



Imagery: Fazenda Santa Maria / Santa Maria d'Oeste (blue polygon) in June 2023, demonstrating soy production (blue shape fill) after clearing of the area between July 2022 and July 2023.

Coordinates: -10.91761, -45.97645.

Source: @2026 Airbus; Soy area confirmed in 2024 by Song et. al. 2021. "Soy Planted Area".



# Soy case (August 2023)



## Fazenda Santa Maria / Santa Maria d'Oeste

Environmental fines and embargoes			
<b>Embargoes:</b>	No	-	
<b>Environmental fines:</b>	Yes (other links)	1 environmental fine in 2003 due to the clearance of native vegetation in the municipality of Uberaba (MG)	BRL 1,500
Ownership and other linked properties			
<b>Ownership:</b>	Canabrava Agropecuária		
<b>Company group:</b>	Incorporadora Canabrava Empreendimentos Imobiliários, Canabrava Participações, MMA Guarda de Documentos, all registered in Uberaba (MG), and Sociedade de Fomento Mercantil e Serviços (registered in Prata - MG)		
<b>Linked properties:</b>	The company Canabrava Agropecuária operates a cluster of properties in Formosa do Rio Preto (BA), totalling 87,000 ha consisting of the properties Fazenda Santa Maria and Fazenda Santa Maria d'Oeste. There are other 3 linked properties. In Jequié (BA): Fazenda Serra do Xavier (400 ha). In Uberaba (MG): Fazenda Jurema (unknown area). In Prata (MG): Fazenda Piraçan (unknown area)		
Supply chain links			
<b>Main Commodities</b>	Soy		
<b>Confirmed supply chain link, level of certainty, and soy trader/ beef processor</b>	<b>Yes</b>	<b>High / Low</b>	<b>Bunge / ALZ Grãos, Cargill</b>
<b>Companies' reply</b>	Cargill: Considering the 10 cases of the present report, "in 2 cases, we negotiated with the mentioned farm or farms close to the one mentioned, and we have evidence that the clearance was legal; in 1 case, we negotiated with the farm in 2022, but now the supplier is blocked."		
<b>Soy</b>	<b>Warehouses (50 km radius)</b>	31 warehouses including 2 owned by Bunge, 2 by Cargill, and 1 by ALZ Grãos	
	<b>Supply chain links &amp; details:</b>	Fazenda Santa Maria supplied soy to Bunge in 2017	
<b>Beef</b>	<b>Slaughterhouses (sourcing from the municipality)</b>	-	
	<b>Supply chain links &amp; details:</b>	-	
<b>Other supply chain links and details:</b>		The property produces also cotton and corn	
General comments			
<p>Canabrava Agropecuária is one of Brazil's most prominent breeders of American Quarter Horses. Based in Uberaba (MG), the company was established in 1971 by Ferdinando José de Assumpção (deceased in 2018) and is now owned by his son Mario Fernando Palmério Assumpção (1). In 2020, Canabrava Agropecuária received authorization to clear 3,159 hectares of native vegetation in the cluster of Fazenda Santa Maria in Formosa do Rio Preto (BA), despite the suspicion of being linked to land-grabbing operations in the region (2). In 2019, the property Fazenda Santa Maria d'Oeste had 663 ha of native vegetation converted to soybean cultivation (2). Canabrava Agropecuária has links to Chongqing Grain Group and intends to attract Chinese groups for investment in the agribusiness sector in Uberaba (MG) (3). Currently, Canabrava Agropecuária holds BRL 9.7 million in debts with the Brazilian government (4). In 1999 the property Fazenda Santa Maria was listed as a land-grabbing case by the National Institute for Colonization and Agrarian Reform (INCRA), and in 2021, had been linked to conflicts with local communities that claim the ownership of the territory (5). In May 2022, the property Fazenda Santa Maria was visited by an operation of the Civil and Militar Polices to assess conflicts with local communities in the region (6). In February 2023, the Court of Justice obliged the company Canabrava Agropecuária to allow local communities to circulate in the area and to pay an indemnification of BRL 200,000 for blocking access to the area in previous years (7). One of the properties that are part of Fazenda Santa Maria d'Oeste cluster (8 and Gleba J, with another CAR declaration - BA-2911105-AB738498EBFC48FBB9AFFED4253467F9), has the authorization to clear 1,295 hectares of native vegetation valid until August 2023 for agricultural activities (8).</p>			
<p>(1) <a href="http://cbonline.com.br">http://cbonline.com.br</a>                  (2) <a href="https://deolhonosruralistas.com.br/2020/07/22/autorizacoes-para-desmatamento-na-bahia-incluem-gigante-da-celulose-e-fazendeiro-parricida/">https://deolhonosruralistas.com.br/2020/07/22/autorizacoes-para-desmatamento-na-bahia-incluem-gigante-da-celulose-e-fazendeiro-parricida/</a>                  (3) <a href="https://uniube.br/mariopalmerio">https://uniube.br/mariopalmerio</a>                  (4) <a href="http://g1.globo.com/minas-gerais/triangulo-mineiro/noticia/2017/01/interessado-no-potencial-do-triangulo-mineiro-grupo-chines-visita-uberaba.html">http://g1.globo.com/minas-gerais/triangulo-mineiro/noticia/2017/01/interessado-no-potencial-do-triangulo-mineiro-grupo-chines-visita-uberaba.html</a>                  (5) <a href="https://www.campanhacerrado.org.br/noticias/309-atentado-em-formosa-do-rio-preto">https://www.campanhacerrado.org.br/noticias/309-atentado-em-formosa-do-rio-preto</a>                  (6) <a href="https://portaldocerrado.com/justica-realiza-diligencias-em-areas-de-conflitos-de-terras-em-formosa-do-rio-preto/">https://portaldocerrado.com/justica-realiza-diligencias-em-areas-de-conflitos-de-terras-em-formosa-do-rio-preto/</a>                  (7) <a href="http://ne3.caritas.org.br/noticias/a-luta-pelo-territorio-da-comunidade-geraizeira-de-sao-marcelo-conquista-vitoria-judicial">http://ne3.caritas.org.br/noticias/a-luta-pelo-territorio-da-comunidade-geraizeira-de-sao-marcelo-conquista-vitoria-judicial</a>                  (8) INEMA, Bahia</p>			

# Soy case (February 2022)



## Fazenda Roberta

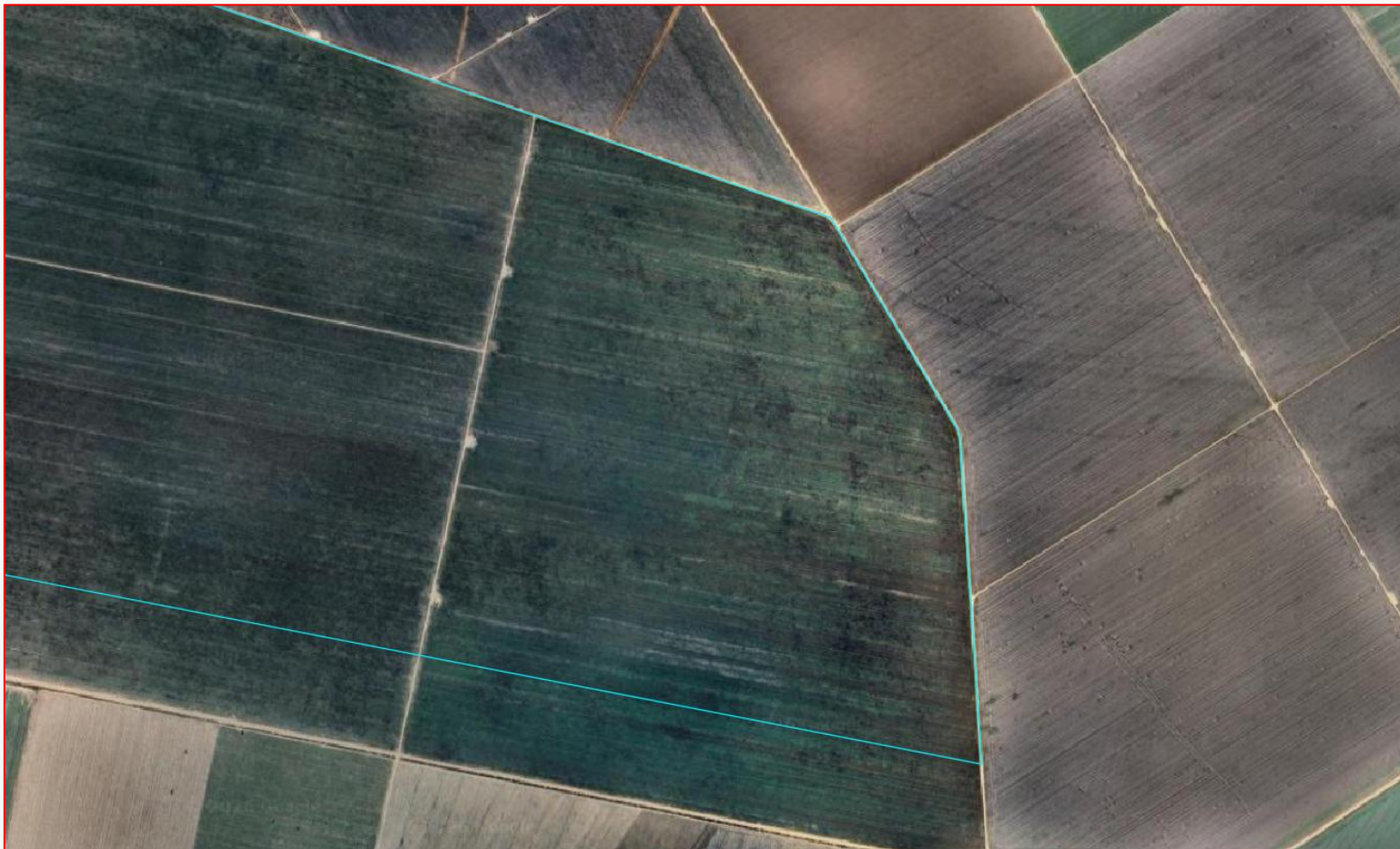
Property	
<b>Fazenda Roberta</b>	
Jaborandi, Bahia	<b>Cerrado biome</b>
<b>CAR:</b> BA-2917359- 7C9EC3E13C234C9DA88496E70 7E1F1C7	<b>SIGEF/SNCI:</b> 2292290311860
<b>Area property (ha):</b> 2,304	<b>Coordinates property:</b> -14.16211, -45.94967
Cleared Area	
<b>Coordinates clearance:</b>	-45.91154, 14.17293
<b>360 Hectares</b>	<b>period clearance:</b> April to June 2021
<b>3 fires alerts</b>	
<b>Inside Forest Code's protected areas:</b> No	- -
<b>Type of vegetation:</b> Savanna Park	<b>Priority for Biodiversity Conservation:</b> Extremely high
<b>Conservation area(s) (overlapping or bordering):</b>	No
<b>Indigenous Territories (overlapping or bordering):</b>	No
<b>Before &amp; After Imagery:</b> limits of the property (blue) limits of the cleared area (red)	
April 2021	June 2021
<b>Fires</b>	<b>08 June 2021</b>
Source: European Union, contains modified 2021, processed with EO Browser Copernicus Sentinel data	

# Soy case (February 2022)



## Fazenda Roberta

Agricultural activity since deforestation: Soy production (May 2023)



Imagery: Fazenda Roberta (blue polygon) in May 2023, demonstrating soy production after clearing of the area between April to June 2021.

Coordinates: -14.17504, -45.91075.

Source: @2026 Airbus; Soy area confirmed in 2023 and 2024 by Song et. al. 2021. "Soy Planted Area".



# Soy case (February 2022)



## Fazenda Roberta

Environmental fines and embargoes			
Embargoes:	No	-	
Environmental fines:	No	-	-
Ownership and other linked properties			
Company group:	Estreito Agropecuária and Rio Pratudão Agropecuária		
Linked properties:	9 properties, totaling at least 1,735 ha. In Jacaraú (PB): Fazenda Paulista e Maravilha (611 ha); in Mamanguape (PB): Fazenda Tabu Gleba I e II (154 ha) and Fazenda Jaçanã (408 ha); in Mataracá (PB): Sítio Nicolau (123 ha); and in Pureza (RN): Fazenda Esperança (323 ha); in Touros (RN): Fazenda Terra Nova (116 ha). In Baía Formosa (RN): Fazenda Uriuna (unknown area). In Jaborandi (BA): Fazenda Correntina (unknown area) and Fazenda Rio Pratudão (unknown area)		
Supply chain links			
Main Commodities	Multiple		
Confirmed supply chain link, level of certainty, and soy trader/ beef processor	Yes	High / Medium	Cargill / ALZ Grãos
Companies' replies	Cargill confirmed trading links with the property but "have confirmed that the land clearance was legal"		
Soy	Main exporters (municipality)	Cargill (100%)	
	Warehouses (50 km radius)	18 warehouses, e.g.: 2 owned by Multigrain (22,000 MT)	
	Supply chain links & details:	ALZ Grãos had contracts with another property under the same ownership	
Beef	Main exporters (municipality)	JBS (80%), Frigosol (20%)	
	Slaughterhouses (sourcing from the municipality)	29 different beef processors sourced cattle from Jaborandi in 2017, e.g.: 1 owned by JBS (Itapetinga - BA)	
	Supply chain links & details:	-	
Other supply chain links and details:	Fazenda Correntina, in Jaborandi (BA), supplied cotton to CDI do Brasil Comércio e Exportação de Commodities Ltda in 2014. In 2017, Estreito Agropecuária supplied sugarcane to Usina Estiva in Baía Formosa (RN), owned by Pipa Agroindustrial.		
General comments			
<p>Registered in Recife (PE), Rio Pratudão Agropecuária is controlled by José Ranulfo da Costa Queiroz Neto and his brothers-in-law Frederico Meira de Vasconcelos and José Vicente Meira de Vasconcelos Neto. The three businessmen own sugarcane and coconut plantations in the states of Pernambuco, Paraíba and Rio Grande do Norte, and soy and cotton farms in Bahia. In 1997, José Ranulfo was elected president of Sindaçúcar in Pernambuco, one of the main employers' union in the sugarcane sector of which he is currently a board member (1). In 2006, 111 workers were rescued from slavery labor conditions in Fazenda Correntina, owned by Rio Pratudão Agropecuária (2). In 2007, 2,000 workers occupied one of his distilleries Usina Salgado, in Ipojuca (PE), protesting for labor debts held by the company surpassing BRL 200 million (3). In the harvesting season between 2013 and 2014, Rio Pratudão Agropecuária estimated revenue from soy and corn plantations in Western Bahia was BRL 23 million (7). In 2016, José Vicente Meira de Vasconcelos Neto was prosecuted by illegal deforestation of an Atlantic Rainforest area in Mamanguape (PB) linked to coconut plantations (8). In 2011, Estreito Agropecuária was fined by Ibama for disrupting the regeneration of 36.8 hectares of native vegetation on a property in Baía Formosa (RN) (9). In 2017, Estreito Agropecuária produced 196,000 tons of sugarcane at Baía Formosa (RN), supplied to Usina Estiva, sugarcane mill from Pipa Agroindustrial, involved in land conflicts against indigenous communities (10).</p>			
<p>(1) <a href="http://www.sindacucar.com.br/ingles/sindacucar.html">http://www.sindacucar.com.br/ingles/sindacucar.html</a>  (2) <a href="https://reporterbrasil.org.br/2006/05/cento-e-onze-trabalhadores-sao-resgatados-no-oeste-baiano/">https://reporterbrasil.org.br/2006/05/cento-e-onze-trabalhadores-sao-resgatados-no-oeste-baiano/</a>  (3) <a href="https://www.cptne2.org.br/index.php/publicacoes/noticias/noticias/1772-dois-mil-trabalhadores-ocupam-usina-salgado-em-ipojuca">https://www.cptne2.org.br/index.php/publicacoes/noticias/noticias/1772-dois-mil-trabalhadores-ocupam-usina-salgado-em-ipojuca</a>  (4) <a href="http://testes.sistemafaep.org.br/sistemafaep/trabalho-duro-para-enriquecer-com-lavouras">http://testes.sistemafaep.org.br/sistemafaep/trabalho-duro-para-enriquecer-com-lavouras</a>  (8) <a href="https://www.trf5.jus.br/data/2016/04/PJE/08073431320154050000_20160420_70909_40500004088607.pdf">https://www.trf5.jus.br/data/2016/04/PJE/08073431320154050000_20160420_70909_40500004088607.pdf</a>  (9) <a href="https://servicos.ibama.gov.br/ctf/publico/areaseembargadas/ConsultaPublicaAreasEmbargadas.php">https://servicos.ibama.gov.br/ctf/publico/areaseembargadas/ConsultaPublicaAreasEmbargadas.php</a>  (10) <a href="https://valor.globo.com/agronegocios/noticia/2021/07/12/mpf-cobra-plano-contras-queimada-de-cana-perto-de-comunidade-indigena-no-rn.ghtml">https://valor.globo.com/agronegocios/noticia/2021/07/12/mpf-cobra-plano-contras-queimada-de-cana-perto-de-comunidade-indigena-no-rn.ghtml</a></p>			

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