

# TOXIC TAKEAWAYS

How Europe's meat industry drives human rights abuses in Paraguay

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## EXECUTIVE SUMMARY

A wave of violent conflict is sweeping the Paraguayan countryside, driven by demand for land to grow a single crop: soy.

Nestled between Brazil and Argentina in the heart of South America, Paraguay is the world's fourth largest exporter of soy. But the social and environmental impacts of its soy industry have received little scrutiny compared to its giant neighbours.

This is partly because soy production in Paraguay generates less deforestation. Soy is grown principally in the country's fertile east, which had already lost the bulk of its forest by the dawn of the twenty-first century.

As our investigation reveals, however, this fact has emboldened western corporations to turn a blind eye to widespread human rights abuses. In Paraguay's soybean heartlands, rural communities are enduring illegal evictions, armed attacks, poisoning by illegal fumigations, and criminalisation – all to secure land to grow soy for export.

In 2022, Global Witness travelled to eastern Paraguay to investigate this conflict.

We visited a range of Indigenous and campesino communities across four of Paraguay's main soy-growing departments, gathering evidence of the abuses and identifying the soy producers responsible.

We saw how abandonment by the Paraguayan state is leaving communities defenceless in the face of the aggressive expansion of large-scale agribusiness. We witnessed how communities of land and environmental defenders are engaging in resistance. And we documented how complaints of human rights violations are linked to some of the world's biggest companies.

90% of Paraguay's soy harvest is exported. These exports are handled by massive multinational commodity traders, which control the global



Police arrive en masse to enforce an illegal eviction of an Indigenous community in Paraguay. *Ka'a Poty* community member

trade in grains and oilseeds. Around 40% of Paraguay's soy exports are handled by just two of these firms: Cargill and ADM. Together, these US giants dominate the Paraguayan economy, extracting huge revenue from Paraguayan land.

For each of the community conflicts, we identified the traders buying from the soy producers causing human rights abuses. In every instance, we found links to either ADM or Cargill.

In two cases, we also uncovered ties to a third US giant, named Bunge.

We then traced the onward journey of this soy. 80% of the global soy harvest is used in animal feed. Drawing on shipping data and interviews with industry insiders, we mapped the opaque supply chains connecting rights violations in Paraguay to two of Europe's biggest meat companies.

One route led us to 2 Sisters, the UK's biggest chicken company and a supplier of corporate giants including Tesco, Marks and Spencer, KFC and Nando's.

The second led us to Danish Crown, Europe's largest meat processing company, which supplies a rollcall of the continent's biggest retailers, including Sainsbury's, Carrefour, Intermarché, Lidl, and Netto.

The traders' historical and ongoing purchases of soy from Paraguayan farmers who have violated basic human rights represent egregious failings under international UN and OECD standards.

Moreover, these failings are all too readily inherited by the European corporates our investigation encountered – even being baked into voluntary sustainability commitments they have adopted to ensure soy in their value chains is 'responsibly produced' by 2025.

Our research reveals how the companies involved have adopted what we consider to be an accounting trick known as 'mass balance certification'. This system – ostensibly intended to help clean up Europe's soy imports – mixes soy from farms like those we visited in Paraguay into nominally certified consignments, resulting in the tainting of most of Europe's Paraguayan soy imports.

From the traders themselves, through the animal feed companies they supply, and onto the mega farms, meat processors, and big brand retailers named in this report, the acceptance and promotion of this nominally 'sustainable' soy constitutes negligence dressed as sustainability, and locks human rights risk into these supply chains.

As a result of these failings, our investigation shows, millions of European consumers of 2 Sisters' and Danish Crown's products are also likely purchasing products made at the expense of the fundamental human rights of Indigenous and campesino communities in Paraguay.

We sent our findings to all the companies concerned. Nearly all of those who responded said they would investigate what they regarded to be violations of their policies on human rights and land rights. All of the responses received are summarised in the Annex, below, and some are included in this report.

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European governments have long committed to end corporate complicity in human rights and environmental harms.

The European Union (EU) has recently proposed two laws mandating that companies eliminate human rights, environmental and climate abuses from their value chains.

The proposed Deforestation Regulation, and the Corporate Sustainability Due Diligence Directive (CSDDD) will both require companies to carry out checks on their supply chains – known as due diligence – to identify their existing and potential impacts, prevent their activities from contributing to further harms, and address those that have already occurred.

This process has the potential to help eradicate abuses from corporate value chains, particularly for high-risk agricultural commodities such as soy.

Yet these proposals are still under negotiation, and it is critical to ensure they provide sufficient accountability.

Industry lobbying by many of the traders and animal feed companies exposed in this

investigation has advocated for the new rules on deforestation to accept leaky certification systems that would ensure continued imports of soy tarred by land grabbing and human rights harms. Although the European Parliament is working to resist this, the proposed EU Deforestation Regulation will only apply to human rights cases linked to recent deforestation, and cases like those in this report will not be covered.

The proposed draft EU directive on human rights due diligence is also full of loopholes. Companies like ADM and Cargill may not be required to do due diligence on all the farmers they source from, such as those in Paraguay our investigation exposes.

The draft directive also formalises a role for exactly the types of ‘industry initiatives’ and ‘third-party verifications’ our investigation reveals are a conduit for structural human rights risks, and can prevent companies from being held legally accountable.

The draft EU directive on human rights due diligence must support and in no way replace or undermine existing rights under the ILO



A home at the Huguá Po'i Indigenous community is surrounded by soy. *Global Witness*

Convention 169 and UN Declaration on the Rights of Indigenous Peoples (UNDRIP), including rights of Indigenous Peoples not to be removed from their lands or territories, their right to redress or compensation for land rights violations, and their right to exercise free and prior informed consent (FPIC).

The UK government has also been urged to introduce similar human rights and environmental due diligence legislation for businesses, but has yet to propose concrete plans to do so. Separately, some of the cases in this report could potentially be addressed under Schedule 17 of the Environment Act 2021. Yet Schedule 17 requires further regulations to be made by the Secretary of State before it can bring accountability to companies such as those in this report. The timetable for the passage of those regulations remains uncertain.

### European lawmakers must ensure they strengthen proposed

## legislation to prioritise people and planet over accounting tricks, opacity, and impunity for the companies dominating Europe’s industrial food system.

They must impose strong, enforceable rules holding companies accountable for the elimination of human rights and environmental harms from their supply chains and the provision of remedy where harms occur.

The Indigenous and marginalised farming communities impacted by human rights violations in rural Paraguay are counting on it.

### PROBLEMS IN PARAGUAY

- > Soy production in Paraguay is fuelling a wave of conflict and dispossession, impacting both the country’s Indigenous peoples and its small-scale farming or campesino communities



Locations in Eastern Paraguay of Indigenous and campesino communities impacted by human rights and land rights harms linked to soy production, and the facilities of companies involved in commercialising the soy produced.

> In 2022, Global Witness visited a range of the communities affected, travelling through four of Paraguay's major soy-producing departments: Alto Paraná; Candindeyú; San Pedro; and Caaguazú

> On this journey, we documented a raft of serious human rights abuses: forced evictions; armed attacks; chemical poisoning; threats; intimidation, and the criminalisation of communities pursuing legitimate land claims

## Forced evictions in Alto Paraná: the Ava Guaraní's struggle with soy

### The Cerrito community

The Indigenous community of Cerrito is situated among the endless soy fields that blanket Alto Paraná, Paraguay's biggest soy-producing region. Its residents, members of the Ava Guaraní people native to eastern Paraguay, are battling to return to land which once belonged to their ancestors, but today is dominated by industrial agribusiness.

"When I was 12 or 13, this was all forest, with many fruits," recalls Arnalda Martinez, a woman in her sixties who grew up, like her parents and grandparents, in the area claimed by the Cerrito community. "We hunted in the forest, we fished in the forest, we extracted honey and medicinal plants. And now what has happened? The forest is gone. There's only soy, nothing else is left."<sup>1</sup>

This transformation began one morning in 1955, when a young army captain was handed a historic mission: to open a route through the dense forest that cloaked the south-east of Paraguay<sup>2</sup>. The project launched a wave of colonisation nicknamed "the march to the east", which saw the area, inhabited by a rich patchwork of Indigenous peoples, pass into the hands of private landowners.

"Indigenous people found themselves cornered in the most remote areas of large properties,"



Women of the Cerrito community taking part in a ceremonial dance, 29 March 2022. *Global Witness*

explains anthropologist Gloria Scappini. "They opted first for flight and refuge, and then for migration."<sup>3</sup> Thousands died, and Alfredo Stroessner, Paraguay's brutal Cold War dictator, was accused of genocide.<sup>4</sup>

In 1992, following Stroessner's ouster, Paraguay adopted a progressive new constitution. Article 64 affords Indigenous people wide-ranging new rights, prohibiting "the removal of Indigenous people from their habitat without their express consent."<sup>5</sup> It's on the back of such rights that Indigenous communities such as Cerrito are fighting to return to their former territory.<sup>6</sup>

"We won't let anyone take away our culture," says Martinez, sitting in front of Cerrito's wood-walled *Jeroky* or temple. "So we organised among ourselves to return to where they had expelled us. We returned to recover the forest for our children."<sup>7</sup>

The Cerrito community returned to land now held by a powerful local soy producer, German Hutz, who possesses titles to tens of thousands of

hectares across the departments of Alto Paraná and neighbouring Itapúa.<sup>8</sup> In 2020 Hutz was involved in an injunction to retain his possession of land claimed by the community.<sup>9</sup> Shortly afterwards, in March 2021, court officials cited this case in requesting police assistance to evict the Cerrito community.<sup>10</sup>



Elders of the Ava Guarani community of Cerrito prepare for a ceremony, 29 March 2022. *Global Witness*



Arnalda Martínez, member of the Cerrito Indigenous community, speaking to Global Witness, 29 March 2022. *Global Witness*

Police have since evicted the community three times: firing guns and teargas canisters to drive out the residents, and then incinerating their homes and temple<sup>11</sup>, destroying their crops, and killing their animals.<sup>12</sup> Following the third eviction, in May 2022, community members were left homeless in Paraguay's cold winter, some of the children without clothes, as they were given no time to gather possessions.<sup>13</sup>

Paraguay's state Indigenous Institute (INDI) condemned the evictions, highlighting a range of institutions, including themselves, who should have been consulted before any measures were taken.<sup>14</sup> Senators in the Paraguayan Congress questioned the proceedings that authorised the evictions.<sup>15</sup> Rights groups point to a raft of irregularities, most glaringly, that all three evictions were authorised not by a judge but by a public prosecutor, depriving the community of any opportunity to have its land claim heard.<sup>16</sup> As a result, the evictions were illegal and can be considered "forced evictions": described by the UN as "gross violations of a range of internationally recognised human rights."<sup>17</sup>

Soy harvested from the area claimed by Cerrito is trucked to a large silo owned by German Hutz<sup>18</sup>, located in the nearby settlement of San Lorenzo. Local industry sources indicated ADM may source soy from the silo<sup>19</sup>, which ADM did not deny when

put to them. Hutz did not respond to any of the allegations when contacted by Global Witness.

A little south of Cerrito, in 2021 another Ava Guarani community<sup>20</sup>, named Ka'a Poty, also suffered two forced evictions, the destruction of dozens of homes and its government-recognised school,<sup>21</sup> despite possessing title to more than 1,000 hectares<sup>22</sup> and a court ruling affirming its tenure.<sup>23</sup> The community lived homeless in Asuncion for eight months after the second eviction, in November 2021, but following further verification of their title by state agencies<sup>24</sup> were returned to their land by the government in June 2022.<sup>25</sup> Nonetheless, tensions with farmers remained high<sup>26</sup>, and in August 2022, some community members attacked a farm on the community's land, allegedly threatening, beating and attacking the inhabitants<sup>27</sup>, and now face a raft of charges.<sup>28</sup>

Soy producers operating within the Ka'a Poty's claim include Agricola Entre Rios and Agro Integracion.<sup>29</sup> Both Cargill and ADM source from Agricola Entre Rios, including via a local intermediary named COPRANAR. Cargill also buys soy from Agro Integracion.<sup>30</sup> Agricola Entre Rios did not respond to the allegations we put to them, and despite extensive efforts we were unable to contact Agro Integracion.

Neither ADM nor Cargill denied sourcing from Agricola Entre Rios or Agro Integracion, or any



A gate installed by a soy producer blocks access to land titled to the Ka'a Poty community. *Global Witness*

specific soy producer our research identified as their suppliers. Both US firms indicated they had initiated investigations into the violations of their policies uncovered by our research. On 13 September, two weeks after receiving information from Global Witness, ADM said a record of its investigation into community cases in this report would be available in its public grievance log 'in the next few days'. No such record had been published at the time of writing.<sup>31</sup>

On 19 September, ADM claimed that its preliminary investigation had found that "none of the properties/farms (polygons) belonging to suppliers that source for ADM overlap, or encroach in any way, with either Indigenous Territories or community settlements of smallholders. None of the farms from where ADM sources soy suffered evictions." However, it did not explain how this could be the case in relation to Cerrito or Ka'a Poty communities. Nor did ADM indicate it had consulted with relevant communities. ADM's grievance protocols require the company to engage with relevant stakeholders and publish a record of issues on its public grievance log within two weeks of receipt of information about policy violations.<sup>32</sup>

### How soy conquered eastern Paraguay

Through the past half-century, soy production has transformed Paraguay. From covering just

over a thousand hectares in the 1960s<sup>33</sup>, the crop has grown to occupy 3.5 million<sup>34</sup> – making Paraguay, with a population of barely 7 million, the fourth biggest soy exporter in the world.<sup>35</sup>

Most of this expansion occurred in the country's lush subtropical east, displacing the great Atlantic Forest which spilled into Paraguay from Brazil's Atlantic Coast. Between 1973 and 2000, two-thirds<sup>36</sup> of Paraguay's Atlantic Forest vanished - a loss of 40,000 square kilometres, an area around the size of Switzerland.<sup>37</sup>

Now, what remains of this forest is protected by a zero-deforestation law.<sup>38</sup> But while soy production today drives less deforestation in Paraguay than in neighbouring Brazil,<sup>39</sup> it is fuelling a wave of conflict and dispossession that has gone unnoticed outside the small South American nation.

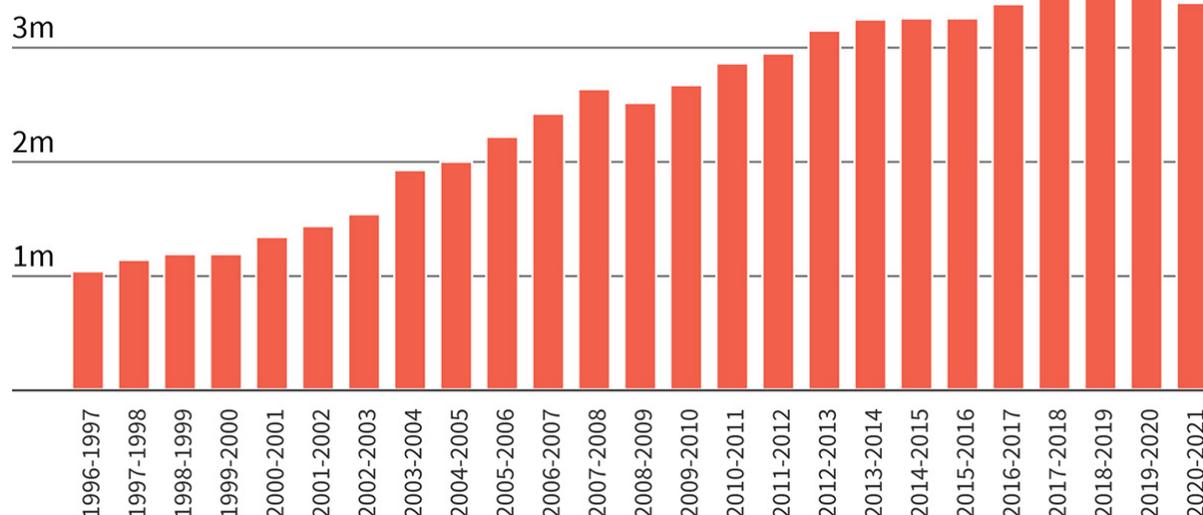
**"We hunted in the forest, we fished in the forest, we extracted honey and medicinal plants. And now what has happened? The forest is gone. There's only soy, nothing else is left."**

Arnalda Martínez, member of the Cerrito Indigenous community

The stories of Cerrito and Ka'a Poty reveal only a fraction of this crisis. In just one year, between 2020 and 2021, rights groups documented twelve forced evictions of Indigenous communities, affecting 725 Indigenous families. They also registered a further ten violent attempts to force small-scale farming or campesino communities off their land.<sup>40</sup>

Nearly all these conflicts were related to soy production to meet overseas demand. 90% of Paraguay's soy harvest is exported.<sup>41</sup> Around 40% of these exports are handled by either ADM or Cargill.<sup>42</sup> The European Union (EU) is the single biggest destination for Paraguayan soy, while the UK is fourth:<sup>43</sup> potentially implicating millions of consumers across Europe in human rights abuses

## Paraguay Soy Production Area 1996-2021 (hectares)



Source: Paraguayan Chamber of Cereals and Oilseeds Exporters and Traders (CAPECO)

against Paraguay's Indigenous and campesino communities.

### Corroding communities in Canindeyú: the devastating impact of soy fumigations

#### The Yerutí colony

Ruben Portillo was just 26 years old when he noticed painful sores on his face and fingers. At first he ignored them, continuing to work on his family farm in the village of Yerutí, planting beans and watermelons in the sweltering Paraguayan summer. But a few weeks later, he developed a high fever, nausea and diarrhoea. Before long, he didn't have the strength to stand up.

His sister, Norma, hired a pick-up truck to take him to the nearest hospital. But it was too late: he died on the way there.

Over the next few days, 22 other Yerutí residents were admitted to the same hospital, including Ruben's two-year-old son Diego. The influx alarmed the hospital's director. Noting that it was January, a month when intense fumigations

precede Paraguay's soy harvest, she contacted the Environment Ministry to voice her concerns.<sup>44</sup>

A week later, government inspectors travelled to Yerutí. They documented a catalogue of egregious violations of Paraguay's environmental law: large soy extensions bordering family farms with no buffer zone separating the two; soy seeded to the verge of community footpaths, with no protective strip of vegetation shielding residents. Tests found endosulfan, aldrin and lindane, all either banned or restricted in Paraguay, in the well water from which the Portillo family drank.<sup>45</sup>

The inspectors also flagged flagrant negligence on the part of two companies, Hermanos Galhera and Condor Agrícola, cultivating soy near the homes of the victims. "The bad management of chemical containers, scattered over the ground," was causing chemical residues to seep into water sources, they observed.<sup>46</sup> Both firms washed their spraying equipment in streams used by the community, and neither had an environmental permit authorising their operations.<sup>47</sup> "Neither of the two met the most basic standards of

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environmental control,” one of the inspectors told a local Catholic radio station.<sup>48</sup>

On the back of these findings, both firms were issued administrative fines. But they appealed the decision and, shortly afterwards, the cases against them were dropped.<sup>49</sup>

Norma, however, refused to abandon the fight for justice. Giving up on the Paraguayan justice system, she took her brother’s case to the United Nations (UN). Six years later, the UN Human Rights Committee issued a damning resolution, concluding that the Paraguayan government’s inadequate response to the illegal soy fumigations violated a series of fundamental human rights, including the right to life, the right to home and family, and the right to remedy from harm. “More than eight years after the events reported, the investigations have made no progress,” the resolution finds, emphasising the state’s failure to conduct an autopsy on Ruben’s body, “even though one was requested on four different occasions”, or to publish the results of any blood or urine tests performed on the victims.<sup>50</sup>

Accordingly, the UN ordered the government to “undertake an effective and thorough investigation into fumigations with agrochemicals”<sup>51</sup> and “impose criminal and administrative penalties on all the parties responsible.”<sup>52</sup> In particular, the resolution highlights the failed investigations into the companies Hermanos Galhera and Condor Agricola.<sup>53</sup>

Three years since the resolution was issued, however, no one has been penalised for Ruben’s death. Meanwhile, the situation in Yerutí continues to deteriorate. When Norma first brought her case to the UN, soy fields hadn’t reached her lot, she says. Now, monocrop production runs right up to her fence, scorching the pasture for her small herd of cows and blighting the crops in her vegetable garden.

“They’re fifty metres from my house without any barrier,” she laments.<sup>54</sup>

The inexorable advance of soy monoculture has eroded the entire community, residents say. Yerutí was founded amid the optimism of the initial post-Stroessner years, on land that a former Minister of Education had returned to the state as compensation for embezzling public funds. Then, it had 223 lots, each busy with activity. Now, just over 30 remain.<sup>55</sup> In 2021, authorities closed the village’s school, citing a shortage of students.<sup>56</sup> Diego, who survived the poisoning which killed his dad and is now a teenager, must travel 20 kilometres every day just to attend classes. With no public transport, he drives there on a motorcycle.<sup>57</sup>

Global Witness found Hermanos Galhera continuing to operate just a few kilometres from Yerutí, harvesting soy and delivering it to ADM, which owns a silo 10km from Yeruti. Hermanos Galhera also supplies soy to Cargill and Bunge, according to soy industry insiders. Condor Agricola also continues to operate in the local area and likely supplies soy to ADM.<sup>58</sup> Neither Hermanos Galhera nor Condor Agricola responded to the allegations we put to them.



Norma Portillo, sister of Ruben Portillo, in Yeruti, March 2022. *Global Witness*



ADM's silo at Curuguaty, Canindeyú, supplied by Hermanos Galhera, a soy producer named in a UN resolution as having illegally fumigated soy crops neighbouring Yeruti Colony. *Global Witness*

### **The Campo Agua'e community**

Two years after condemning state failures in Yerutí, the UN issued another ruling denouncing the devastating impact of fumigations on a nearby Indigenous community.<sup>59</sup>

Campo Agua'e is the fruit of a decades-long struggle by Ava Guaraní leaders to safeguard a piece of their ancestral territory. Settled in the 1960s, as Stroessner's March to the East was gathering pace, the community today consists of 980 hectares that were expropriated from a local agribusiness. For the Ava elders who fought for the land – now buried in a cemetery on a nearby hillside – it ensured a space for their descendants to maintain their culture.<sup>60</sup>

But it's this very culture that is threatened by unchecked and illegal fumigations. The destruction of local biodiversity is eroding "traditional knowledge associated with Guaraní cultural practices of hunting, fishing, gathering and agroecology," the UN finds, citing community concerns that "fruit trees have ceased producing fruit" and "wild beehives disappeared due to the mass mortality of bees."

Elements essential to Ava dance and ritual – such as wax for ceremonial candles, or a specific variety of maize needed to make a fermented drink named chicha – have vanished, community members report, while ceremonial baptisms have ceased taking place, as the necessary materials are no longer obtainable.<sup>61</sup>

"The loss of such ceremonies denies children the rites crucial to strengthening their cultural identity," the UN resolution warns.<sup>62</sup>

Indeed, the fumigations have had particularly severe impacts on the community's schoolchildren. A 2009 government inspection discovered spraying just ten metres from the school while children were in class, an egregious violation of Paraguayan law, which stipulates a minimum distance of 100 metres.<sup>63</sup> It also discovered unregistered agrochemicals on the property of one of the two firms responsible for the illegal fumigations, Issos Greenfield, and concluded that they "systematically failed to comply with environmental regulations."<sup>64</sup>

"We got ill, we had terrible headaches, we had diarrhoea, coughs, fever," says Rosana Riveros, a



Rosana Riveros, a victim of pesticide poisoning in Campo Agua'e, 7 March 2022. *Global Witness*

young woman now in her early twenties who studied in the community's school. "It was very difficult to concentrate, we couldn't learn what we needed to."<sup>65</sup>

An investigation was opened into these violations, but, mirroring the experience of Norma in Yerutí, it was soon dropped without anyone being prosecuted.<sup>66</sup> "More than 12 years after the victims filed their criminal complaint regarding the fumigation with toxic agrochemicals, to which they have continued to be exposed throughout this period, the investigations have not progressed in any meaningful way and the State party has not justified the delay," the UN observed in October 2021.<sup>67</sup>

"It's all written in the law, but who's going to enforce it if not them?" asks Lucio Sosa, Riveros' teacher, who has spearheaded the community's battle against soy production.<sup>68</sup>

While operating next to Campo Agua'e, Issos Greenfield received financing from ADM and sold soy produced on the land to the US firm.<sup>69</sup> Issos Greenfield ceased working in the area a few years ago; now, a Paraguayan firm named Somax SA operates there.<sup>70</sup> While Somax is not responsible for the violations committed by Issos, both the UN<sup>71</sup> and community residents state that fumigations continue to seriously impact the community. Sosa reports that Somax has

installed the required protective barriers in some places, but not others. Community leader Benito Oliviera, who worked with Lucio on the appeal to the UN, is more emphatic: "the situation has not improved at all. It's getting worse and worse as the days go by."

Somax has sold soy from the land to ADM, Cargill and Bunge, all of whom have silos within ten kilometres of Campo Agua'e.<sup>72</sup>

ADM did not deny sourcing from either Hermanos Galhera or Condor Agrícola. Nor did it deny sourcing soy from Issos Greenfield or Somax SA, or having financed Issos Greenfield after the Paraguayan government had accused the firm of conducting illegal fumigations. Neither Cargill nor Bunge denied sourcing from Somax SA. All three US companies said they had initiated investigations into the violations of their policies uncovered by our research.

### **A land soaked in pesticides**

The expansion of Paraguay's soy industry has paralleled a massive increase in the country's use of agrochemicals. Imports of these products – principally the pesticides glyphosate, 2,4D and paraquat<sup>73</sup> – grew almost sixfold between 2009 and 2017, increasing from 8,800 to 52,000 tonnes. One study estimated that, in 2017, Paraguay – home to 0.09% of the global population –



Children play at Campo Agua'e, an Ava Guaraní community impacted by illegal soy fumigations in Canindeyú Department, Paraguay. *Global Witness*

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imported more than six per cent of all the agrochemicals sold in the world: 7.4 kilograms of agrochemicals per inhabitant.<sup>74</sup>

Paraguayan law mandates a buffer zone of at least 100 metres between fumigations and human settlements, including schools and health centres.<sup>75</sup> This is already weak compared to similar jurisdictions: neighbouring Argentina requires a buffer zone of at least 500 metres.<sup>76</sup> But, in Paraguay, as the experiences of the two communities above demonstrate, even the rules that do exist are rarely enforced.

Nor are Yeruti and Campo Agua'e isolated cases. In October 2022, the UN rapporteur for toxic substances and human rights issued a damning assessment of the situation in Paraguay. Ordering the government to comply with the Yeruti and Campo Agua'e rulings, he concluded that "laws on pesticide use aren't enforced" and that this "generates impunity before violations of the human rights of thousands of people exposed to toxic contamination."

During a visit to the country, he found many Indigenous and campesino communities

surrounded by vast monocrop plantations. "Those who oppose the contamination of their communities are frequently criminalised by the Public Ministry," he observed.<sup>77</sup>

Another recent study highlighted the impact on schoolchildren. Published in 2020, it identified 51 schools within 100 metres of extensive monocrop plantations,<sup>78</sup> putting the health of almost 4,000 pupils at risk.<sup>79</sup> In some instances, researchers discovered that schools were closing for days at a time when fumigations were at their most intense.<sup>80</sup>

One seriously impacted district is Minga Pora, in Alto Paraná - the same district in which the Cerrito community is fighting to return to its ancestral land. Nearly a third of Minga Pora's schools - eight out of 25 - are within 100 metres of intensive fumigations, the study found.<sup>81</sup> As in other districts visited by the researchers, community members said they'd complained to the local authorities, but reported that no action had been taken.<sup>82</sup>

"The state is complicit to the degree that people have stopped bothering to denounce violations,



Ava Guarani children observe pesticide spraying at the edge of their village, Campo Agua'e. Neil Giardino / @NeilGiardino

and instead resort to negotiating directly with the soy farmers,” says Mirielle Palau, one of the study’s authors.<sup>83</sup>

## **Criminalising communities in San Pedro: the activists jailed for resisting illegal land grabs**

### **The Sixth Line of Yvyte colony**

Aida Gonzalez knew that when she and her neighbours decided to fight for a piece of land that had been usurped by soy producers, she would be taking on powerful interests. Five years later, she has endured a series of violent evictions, attacks by armed civilians, and repeated threats of imprisonment.<sup>84</sup> Now she is facing renewed efforts to jail her and others for up to ten years, simply for resisting illegal land grabs by agribusiness in Paraguay.<sup>85</sup>

Aida is one of many people from traditional farming families in Paraguay who lack any access to land. With most of the country’s fertile land occupied by large-scale agribusiness, hundreds of thousands of landless farmers live with relatives in overcrowded houses in Paraguay’s impoverished towns and villages.<sup>86</sup>

Together with neighbours in this same situation, Aida identified state land in an old small-scale farming or campesino community which had been irregularly occupied by soy producers. The soy producers had begun cultivating land after it was abandoned by its original residents, campesinos who were driven out by intensive fumigations. “The plantations surrounded me, they were 28 metres from my door,” says Catalino Silva, one of the few original residents who refused to leave. Silva blames “fumigations, corruption, state abandonment” for the disintegration of his hometown, named the Sixth Line of Yvyte Colony.<sup>87</sup>

Hearing of the situation in Yvyte, Aida and her neighbours decided to petition for the abandoned land to be delivered to them. They made their claim under Paraguay’s agrarian

reform laws, which require that state land should be delivered to small-scale farmers rather than large-scale agribusiness.<sup>88</sup> And they adopted the traditional tactic of land activism in Paraguay to force an indifferent state to act: in 2017, they occupied the land they were claiming.

Just as Aida expected, the occupation produced a ferocious response from the soy producers. Through the next four years, they instigated a series of evictions, in which both police and armed civilians repeatedly destroyed homes and crops.<sup>89</sup> One producer, Georg Matthies Derksen, countered with a raft of criminal charges against Aida and others, seeking to prosecute them for property invasion among other crimes.<sup>90</sup> At one point, Aida and another activist, Ceferino Peralta López, spent two weeks in jail.<sup>91</sup>

Then, four years after occupying the site, Aida’s resilience finally paid off. Decisions over the adjudication of state land are the prerogative of Paraguay’s State Land Institute, named INDERT.<sup>92</sup> Initially, INDERT had ruled in favour of the soy producers, even allocating them land occupied by campesinos.<sup>93</sup> But in 2021, the President of INDERT was dismissed amid a corruption scandal.<sup>94</sup> His replacement, Gail González Yaluff, re-evaluated the Sixth Line case. She found “serious irregularities” in the past administration’s favouring of the soy producers, concluding that – just as Aida and her



Francisca Portillo, of the Sixth Line of Yvyte Colony, observes harvesters working land she was evicted from. *Global Witness*



Soy fumigation equipment operating on land from which Francisca Portillo was evicted in 2021. *Global Witness*

commission had argued – their stance was “in total violation of the Agrarian Statute.”<sup>95</sup> Accordingly, Gonzalez revoked several of those rulings and moved to “suspend all procedures relating to Yvype Colony”.<sup>96</sup>

After four years of struggle, it finally seemed that their effort was paying off – and that the Sixth Line community might spring back to life.

But in Paraguay, which languishes in 128<sup>th</sup> place in Transparency International’s corruption index,<sup>97</sup> things are never so simple. Instead of complying with INDERT’s ruling, the soy farmers intensified their attacks. In March 2021, police and armed civilians forced fourteen families from their homes and burnt their crops and possessions.<sup>98</sup> Four months later, another six families were evicted by a huge force of police, some mounted on horseback.<sup>99</sup> “My wife was pregnant and the sight of a hundred police riding towards us terrified her,” says Gerardo Lezcano, a soft-spoken farmer whose home was destroyed during the July eviction. “She lost the baby, our daughter that she’d been carrying for eight months.”<sup>100</sup>

Simultaneously, Matthies Derksen, ramped up efforts to imprison the campesinos. Aida and several other community members face charges of land invasion, which, following a recent change in the law, can carry a prison sentence of up to ten years.<sup>101</sup> The accused face a preliminary hearing in November 2022, based on alleged trespass committed in October 2021 – after INDERT’s resolution identifying “serious irregularities” in Derksen’s possession of the land.<sup>102</sup>

“For demanding our rights, for the simple act of asking for access to a piece of land, they see us as criminals,” Aida says.<sup>103</sup>

Matthies Derksen has also gone after the new President of INDERT herself. In 2021, he lodged a criminal complaint accusing her of instigating criminality.<sup>104</sup> INDERT responded with a defiant statement, accusing Matthies Derksen of trying to “intimidate” the administration in order to “obtain illegal ownership of rural properties for extensive exploitation.”<sup>105</sup>

“The legal tricks planted by certain sectors constitute a flagrant attempt to bully this

administration,” the statement reads, ending: “WE WON’T BE INTIMIDATED BY SECTORS MOTIVATED BY DARK INTERESTS!”<sup>106</sup>

However, while criminal charges hang over Aida and Ceferino, INDERT is powerless to rule in their favour, as the charges against them prohibit them being awarded state land.<sup>107</sup> And should Derksen’s campaign to imprison them be successful, they could face years in Paraguay’s brutal and overcrowded prison system.

Matthies Derksen belongs to a cooperative named Friesland.<sup>108</sup> He supplies soy both to a silo operated by the cooperative and reportedly to a second nearby silo owned by a similar cooperative, named Volendam.<sup>109</sup> All soy delivered to the Friesland silo is exported by the Russian grain giant Sodrugestvo.<sup>110</sup> ADM and Cargill are the two international traders with soy infrastructure including silos and ports closest to the Volendam cooperative.<sup>111</sup>

The soy producer responsible for evicting Gerardo Lezcano and his family sells soy to a nearby silo called Seagri, which has a long-established supply relationship with Cargill.<sup>112</sup>

Neither Matthies Derksen, Friesland, Volendam, nor Seagri responded to these allegations when we contacted them. Cargill did not deny it sources from Derksen’s properties via Volendam, nor other properties within the community’s land claim via Seagri, saying it had launched investigations into the violations of its policies uncovered by our research.

### **Repression and resistance in the Paraguayan countryside**

Paraguay has one of the most unequal land distributions of any country in the world. Just 12,000 people own 90 per cent of Paraguayan land; the remaining 10 per cent is split between more than 280,000 small and medium-sized producers. Beyond that lies a destitute hinterland of 300,000 small-scale farming families without access to any land at all.<sup>113</sup> This generates a Gini



A Cargill soy silo in Eastern Paraguay. The company trades soy linked to human rights abuses suffered by communities like the Sixth Line of Yvyte Colony. *Global Witness*

coefficient of 0.93, far higher than anywhere else, even in the notoriously unequal region of Latin America.<sup>114</sup>

Multinational corporations profit directly from this inequality. The UN estimates that only 6% of Paraguay’s agricultural land is available for domestic food production, whilst 94% is used for export crops.<sup>115</sup> Soy is by far Paraguay’s single biggest export, and in 2020, 40% of soy exports were handled by either ADM or Cargill.<sup>116</sup>

Organisations representing Paraguay’s traditional farming or campesino communities have fought to resist this takeover. One, the National Federation of Campesinos (FNC), claims to have won titles to more than 300,000 hectares since the fall of the dictatorship in 1989.<sup>117</sup> Their strategy involves direct action: they identify lands that are illegally held by large-scale producers, and then they stage occupations, demanding that the state recognise the claim.

This struggle, however, has come at a cost. At least 128 campesinos and campesinas have been assassinated, and thousands of farmers imprisoned, since the return to democracy in 1989.<sup>118</sup>

The FNC's goals are supported by experts. "It is of vital importance to fully implement the long overdue Agrarian Reform," the UN's Special Rapporteur on the Right to Food said during a 2016 mission to Paraguay. She urged the government to "incorporate human rights principles in order to protect smallholder farmers and their livelihoods."<sup>119</sup>

But rather than pursue such measures, the Paraguayan government is intensifying its repression of campesino activism. In 2021, President Benitez enacted a law elevating the sentence for "property invasion" – the tool most often used to criminalise those demanding land restitution – from six to ten years.<sup>120</sup>

At the same time, the government has slashed the budgets of the very state institutions responsible for resolving land disputes. Both the Land Institute, INDERT, and the Indigenous Institute, INDI, have seen their budgets slashed in recent years. INDERT's budget has fallen by two-thirds in just six years, from US\$ 43m (300 billion Guaraní) in 2014, to US\$ 26.8m in 2019, to US\$

22.6m in 2020, to just US \$15.62m (108 billion Guaraní) in 2021.<sup>121</sup>

Similarly, INDI experienced a 16% budget cut in 2021. Analysis by one Paraguayan rights group found that the total budget destined for the purchase of land in 2021 would have enabled INDI to acquire just 600 hectares for Paraguay's Indigenous communities, a quantity it called "dramatically insufficient."<sup>122</sup>

Rights groups in Paraguay draw a parallel between this lack of state capacity and low taxes on agribusiness, Paraguay's principal industry. Calculations by one civil society group, BASE-IS, estimated that exporters of soy, wheat and corn – which together represent over 10% of Paraguay's entire GDP<sup>123</sup> – contribute just 1.72% to the country's total tax income.<sup>124</sup>

In the case of the commodity traders, tax figures obtained by Global Witness indicate they pay only a fraction of the huge income they generate in Paraguay back in tax. Customs data show that ADM exported US\$ 512m of goods in 2020,<sup>125</sup> a year in which the firm paid US\$6.18m in income tax<sup>126</sup> – equivalent to just 1.2% of the firm's



Campesino and Indigenous peoples at the 'XXVII Gran Marcha Campesina' (27<sup>th</sup> Big Campesino March) demonstrate against land injustice and impunity, Asuncion, 25 March 2022. *Global Witness*

enormous export revenues. Cargill's figures tell an even more extreme story: in 2020, they exported US\$ 713m worth of goods,<sup>127</sup> while paying just US\$ 1.46m in income tax – representing barely 0.2% of their enormous export revenue.<sup>128</sup> In its response to Global Witness, ADM did not dispute these figures, but affirmed that it “has a firm commitment to comply with all tax regulations in the country,” as proven by its “audits and periodic reporting obligations.” Cargill did not comment on its tax affairs.

These low tax bills are aided by the lack of any soy export tax, in sharp contrast to Paraguay's neighbour Argentina, which imposes a levy of 33%.<sup>129</sup> The UN's Special Rapporteur urged Paraguay to “enact a law introducing tariffs on the export of grain, including soya, which should help to increase tax revenues and, ultimately, social expenditure.”<sup>130</sup> However, attempts to create such a tariff have been repeatedly struck down, both by Paraguay's Congress<sup>131</sup> and, on the one occasion it successfully passed the legislature,<sup>132</sup> directly by Presidential veto<sup>133</sup>.

## Armed attacks in Caaguazu: The Mbya Guaraní's battle with soy

### The Huguá Po'i community

The residents of Huguá Po'i, an Indigenous community in eastern Paraguay, had sworn to resist any attempt to throw them out of their homes. But when the eviction came, the force was overwhelming: 400 riot police, submachine guns, horses, a helicopter slicing the air overhead. Armed solely with bows and branches, they had no option but to abandon their village and step out into the pouring rain.<sup>134</sup>

As police led people away, armed civilians swept in from the soy fields to the north. Using tractors and chainsaws, these men, working under the orders of local soy producers, destroyed the community's farms and croplands. They tore down their houses and set fire to their *opy*, the



Mbya Guarani Indigenous elders play music during a ceremonial dance at Huguá Po'i. *Global Witness*

spiritual temple of the Mbya Guarani, close relations of the Ava in eastern Paraguay.<sup>135</sup>

The villagers refused to be cowed, and just three months after the eviction – which occurred on 18 November 2021 – they reoccupied the site. They began again the hard work of constructing homes, planting crops, and building a new *opy*, located close to an ancient burial ground.<sup>136</sup>

But the threat of another eviction shadowed all this effort. The same land was claimed by a local farming cooperative named Tres Palmas. Tres Palmas acquired the land from the Paraguayan state in 1977, with Mbya communities inside it – triggering the conflict that continues in Huguá Po'i today.<sup>137</sup>



Armed police prepare to evict the community at Huguá Po'i in July 2022. *CODEHUPY*



Trucks leaving the soy silo of farming cooperative Tres Palmas S/A, which argues that the Indigenous Mbya Guaraní communities within its land claim are being weaponised by politicians to extort private landowners. *Global Witness*

Aiming to prevent a second eviction, Paraguay's Indigenous Institute (INDI) sought a protective measure for Hugua Po'i in the courts. Finally, at midday on 12 July 2022, it was granted. But it came too late: that morning, hundreds of police had again encircled the community, enforcing an eviction order from a local judge who, rights groups argue, did not have competency to rule on the case.<sup>138</sup> Hugua Po'i residents watched as their homes and crops were razed for a second time. Two weeks later, one of Hugua Po'i's youngest members, a two-month-old baby named Néstor Villalba Mendoza, died of breathing difficulties.<sup>139</sup>

Tres Palmas operates a silo 5km from Hugua Po'i, where they store soy harvested from the disputed land. From there, soy is trucked directly to ADM's port facilities south of Asuncion, Port Sara.<sup>140</sup>

Tres Palmas argue that the evictions were authorised through the civil courts on the basis of a land title that has been in their possession for the more than fifty years. The Hugua Po'i land claim is not a case of Indigenous peoples seeking land restitution, they argue, but rather local

politicians weaponizing Indigenous rights to extort money from private landowners.<sup>141</sup>

### **The Loma Piro'y community**

For the Mbya Guaraní, the land that lies between the Acaray and Monday rivers in eastern Paraguay is known as "Mbae Vera": "the land that shines". Though the forest that once cloaked the region is largely gone, its glades and forest trails remain woven through Mbya mythology.<sup>142</sup>

"For us, it's land that gives life to all humanity," says Mario Rivarola, leader of the Organización Nacional de Aborígenes Independientes. "Without land there is no life. We come from earth, and we become part of the earth again."<sup>143</sup>

Today, instead of trees, the "Mbae Vera" is carpeted with vast soy monocultures. Mbya leaders warn that this dispossession threatens the total disintegration of their culture and community ties.<sup>144</sup> Hugua Po'i represents a determined effort to preserve their connection with this ancestral land.

Just 12km north of Hugua Po'i, another Mbya community is fighting to retain this link with their

traditional territory. Named Loma Piro’y, the community has also suffered serious human rights abuses at the hands of individuals reportedly acting for local soy producers.

In December 2020, a group of men armed with shotguns and electric batons marched into Loma Piro’y. Opening fire over people’s heads, they ordered them to abandon the land or risk being shot.<sup>145</sup>

A report to the Prosecutor’s Office made by two Loma Piro’y residents describes what happened next. “They beat up some of our neighbours, fracturing people’s arms, and chased us out.”<sup>146</sup> Then they burnt the community’s houses, church and school, and robbed their telephones, their food and their animals.<sup>147</sup>

Despite the violence and death threats, the community clung on. But the police apparently did nothing, and three months later, Loma Piro’y suffered another assault. This time, nine residents were seriously injured.<sup>148</sup>

“My cousin was struck by a machete here,” says Dominga Coronel, the community leader, pointing at the top of her head. “His brother was cut on his face, and four or five women were hit on their arms by clubs.”<sup>149</sup> This time, the authorities did take action, and several local



Dominga Coronel, resident of Loma Piro’y, is fighting to retain their land and prevent her Indigenous community becoming destitute. *Global Witness*

landowners and soy farmers were charged with coercion.<sup>150</sup>

These attacks, too, were driven by a fundamental clash of worldviews. In both conflicts, the landowners are descendants of uprooted Mennonite communities who came to Paraguay with little, seeking to sow a life in the fertile soil.<sup>151</sup> In the case of Loma Piro’y, both the Mennonites and the Mbya Guarani claim possession of land that was left to Indigenous people by German pastors in the 1980s. Through subsequent decades, it was gradually taken over by large-scale commercial farmers.<sup>152</sup>

“Our grandfathers lived in this, our ancestral territory, here they had their opy,” Armado Portillo, a Loma Piro’y resident, told the local publication *Joaju*. “This was a forested place, and now there are no forests, only soy.”<sup>153</sup>

Soy produced on land claimed by the Loma Piro’y community is harvested and delivered to a nearby silo owned by a firm called Agro Panambi. Cargill has sourced from AgroPanambi, Global Witness’s research suggests.<sup>154</sup> Agro Panambi did not respond to Global Witness’s request for comment.

Neither ADM nor Cargill denied sourcing from Tres Palmas and Agro Panambi respectively. Both US firms said they had initiated investigations



Loma Piro’y community members return to their home, which is surrounded by commercial soy plantings owned by farmers who have violently attacked them multiple times. *Global Witness*

into the allegations of human rights abuses and violations of their policies.

### **Defending Indigenous rights in Paraguay: a risky business**

The evictions of Huguá Po’i, Ka’a Poty and Cerrito – plus the dozen more documented by rights groups in 2021 alone – occurred despite the clear Indigenous land rights enshrined in Paraguayan law.<sup>155</sup> These national protections are amplified in various international agreements which Paraguay has ratified, such as Convention 169 of the International Labour Organisation, and the UN Declaration of the Rights of Indigenous people.<sup>156</sup>

The recent wave of forced evictions is not the first time the Paraguayan government has been accused of violating Indigenous rights, however. Since 2005, the Inter-American Court of Human rights has issued three rulings condemning abuses.<sup>157</sup> In one case, the Court specifically emphasised that the fact land is in private hands is not sufficient justification to deny a community’s right to territorial restitution.<sup>158</sup>

This failure to uphold Indigenous land rights reflects a deep rot in the Paraguayan justice system, defenders argue. Juan Rivarola, a lawyer with the human rights group CODEHUPY, says that judges and prosecutors are aware that ruling against powerful agribusiness interests could destroy their careers. “They tell me, ‘I have to be flexible on this one, or I could be dismissed’,” he says. “This is very serious because it affects the independence of the judiciary.”<sup>159</sup>

One official who experienced this first-hand is Eresmilda Román Paíva, a judge in the city of Itakyry, located 20km north of Ka’a Poty in Alto Paraná . Román began work as a magistrate in 1995. Twenty years later, a case landed on her desk that would change her life forever.

“In 2015, an Indigenous chief brought a lawsuit to my court,” Román begins. This leader was having trouble with a Brazilian farmer who was cultivating soy on his community’s land. The farmer had rented land from the leader’s predecessor, but the new leader felt the arrangement was exploitative and wanted the land back.<sup>160</sup>



Lawyers affiliated with the human rights group CODEHUPY outside Caaguazú public prosecutor’s office, having petitioned for the suspension of an eviction of the Huguá Po’i Indigenous community, 3 March 2022. From left to right: Juan Rivarola, Abel Areco, and Fulgencio Torres. *Global Witness*

It didn't take Román long to reach a conclusion. Paraguay's constitution prohibits the renting of Indigenous land,<sup>161</sup> and the arrangement hadn't been approved by Paraguay's Indigenous Institute. "I annulled the contract," she says, "and returned the land to the community."<sup>162</sup>

Before issuing her final ruling, however, she began receiving threats from the soy farmer's lawyer, Nelson Alcides Mora. "He even put it in writing," Román says, showing a letter, signed by Alcides, in which he warns that "magistrates who act in a similar fashion end up in a Jury for the Prosecution of Magistrates."<sup>163</sup>

Román, though, takes the responsibility of her position seriously. She refused to bow to the lawyer's pressure and ordered that the land be returned to the community.

It was then that her problems really began. First, Alcides appealed her ruling and succeeded in getting it overturned. Then he acted on his threat, denouncing Román before a professional tribunal. Simultaneously, he pursued a defamatory media campaign, claiming she'd corruptly pocketed money by stealing his client's soy, she reports.<sup>164</sup>

Through the next seven years, Roman awaited a verdict on the case. Every day, the threat hung over her: the arrival of a letter or phone call that would banish her from her profession, destroying the career she'd spent almost three decades building.

In December 2021, the rights group CODEHUPY intervened in the case, alerting the UN special rapporteur on the independence of judges and lawyers and presenting an Amicus Curiae before the Paraguayan courts.<sup>165</sup>

Eventually, in October 2022, the pressure bore fruit, and the case against Eresmilda was finally dismissed.<sup>166</sup>

"It causes psychological damage to be left waiting so long," Román says. "I always feel it here, like a Sword of Damocles, a blade close to the top of my head that doesn't allow me to move."<sup>167</sup>

## Summary of trader links

Community	Traders Linked	Human Rights Abuses
<b>Cerrito</b>	ADM	Forced Evictions Criminalisation
<b>Ka'a Poty</b>	ADM, Cargill	Forced Evictions Criminalisation
<b>Yeruti</b>	ADM, Bunge, Cargill	Chemical Poisoning
<b>Campo Agua'e</b>	ADM, Bunge Cargill	Chemical Poisoning
<b>Sixth Line of Yvype</b>	Cargill	Forced evictions Armed attacks Criminalisation
<b>Hugua Po'i</b>	ADM	Forced evictions Criminalisation
<b>Loma Piro'y</b>	Cargill	Armed attacks

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## EUROPE'S CONTRIBUTION TO THE HARMS

Our investigation reveals how millions of consumers across Europe are likely contributing to the forced eviction, poisoning, repression, and criminalisation of Indigenous and campesino communities in Paraguay.

By combining shipping data with insights from insiders across the soy, meat, and animal feed industries, Global Witness traced the connections between the conflicts documented in this report and European companies. First, we tracked the flow of soy from the plantations producers engaged in conflict with Indigenous communities to the silos and port facilities of ADM and Cargill. We then charted its journey across the Atlantic, to feed firms, meat producers, and finally the retailers and restaurants who sell products containing Paraguayan soy to consumers across Europe.

### Europe driving demand

Europe imported 34.3 million metric tonnes of soy in 2019, including around two-thirds from South America.<sup>168</sup> Greenpeace research indicates that the same year Europe mobilised nearly 12 million hectares of land abroad to meet its demand for soy for animal feed.<sup>169</sup>

The continent plays an outsized role as a source of demand for Paraguayan soy, and for years the European Union (EU) has been Paraguay's number one export market.<sup>170</sup>

Soy grown in Paraguay enters Europe in two main ways, directly and indirectly. The majority, around 1.1m tonnes in 2019, is imported with Paraguay as its recorded origin, principally as soymeal, a course flour produced by crushing soy beans.<sup>171</sup>

Within Europe, Poland, the UK, and Denmark are the biggest buyers of soymeal directly from Paraguay, with Italy also playing a major role in some years.<sup>172</sup> In 2021, UN COMTRADE reports that Poland imported just under 372,000 tonnes

of Paraguayan soymeal, the UK 290,000 tonnes and Denmark 70,000 tonnes.<sup>173</sup>

However, the actual volumes of Paraguayan soy imports into Europe are likely far higher, and its end-destinations and use within Europe more nuanced.

Beyond direct imports, in 2019, for example, a further 0.7 million tonnes was likely imported into Europe mixed into the 7.7 million tonnes of soymeal Argentina supplied the continent, as over 3.3 million tonnes of soybeans grown and harvested in Paraguay were processed in Argentina's vast crushing industry, and then reexported as Argentinean soymeal.<sup>174</sup>

As such, in 2019/2020 Europe likely absorbed about 1.8 million metric tonnes of Paraguayan soy – over 5.2% of imports<sup>175</sup> – significantly higher than Paraguay's roughly 3% contribution to global soy production.<sup>176</sup>

Europe has been a key driver of soy expansion in Paraguay, with around 615,000 hectares of Paraguayan land occupied to produce soy for the continent<sup>177</sup> – an area four times the size of Greater London, or nearly four times the area of Paris, Berlin, Brussels and Rome combined.

Additionally, within Europe, the UK is a particularly big source of demand for Paraguayan soy, which contributes a far higher proportion of the UK's overall supply than direct trade suggests.

Data provided to the Agricultural Industries Confederation (AIC) by key traders including ADM, Cefetra, and Cargill, which includes indirect imports via European member states, indicates that the UK actually imported 375,215 tonnes of Paraguayan soybean meal equivalent in 2020, and 371,000 tonnes in 2019, making up 15.6% and 16% of soy for animal feed imported into the UK in those respective years.<sup>178</sup>

The UK's huge apparent use of Paraguayan soy is driven by demand for the chicken sector, and

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likely to a significant degree by the UK’s biggest chicken firm, 2 Sisters.<sup>179</sup>

### Charting secretive shipments

Paraguayan soy’s precise routes into European supply chains are veiled behind secretive transshipments at mammoth transit terminals in third countries, principally in Argentina. Most available trade data does not illuminate who ships what to whom, where or when.

But our research has pierced that veil.

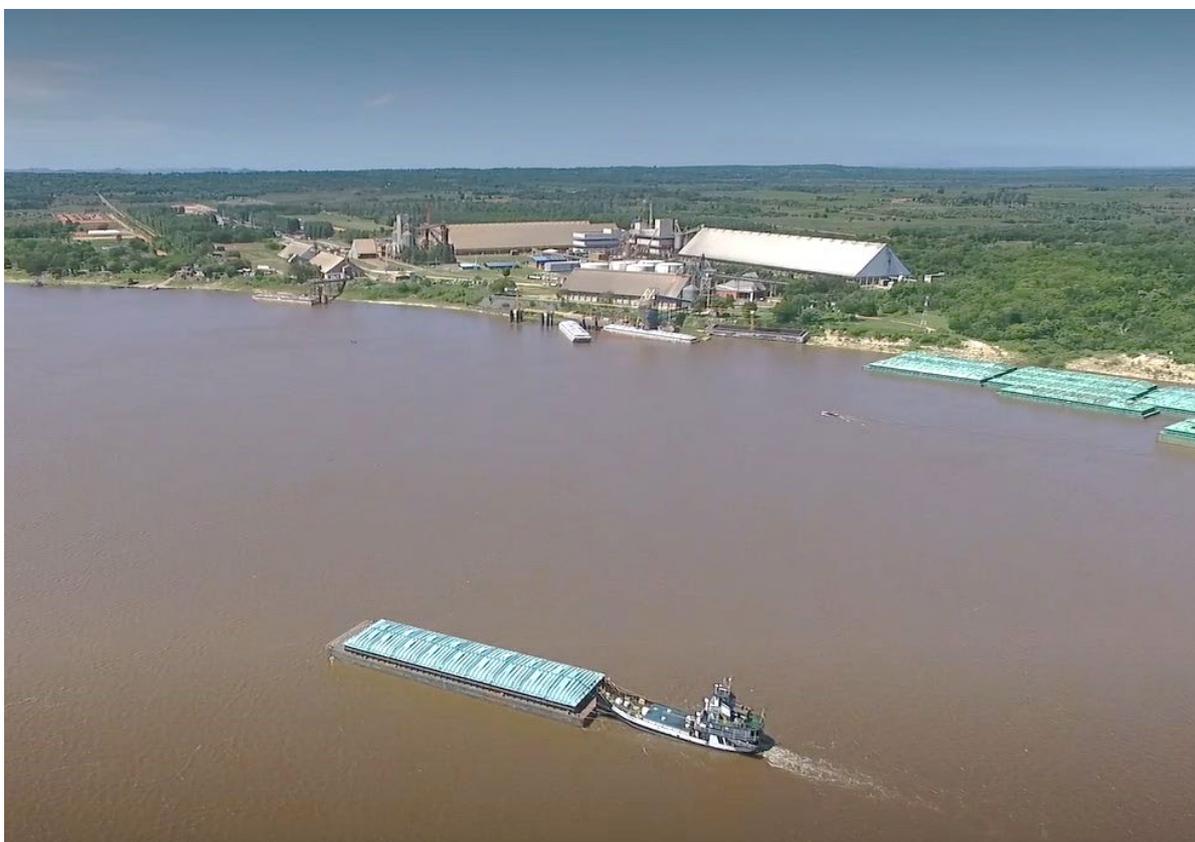
As a land-locked country, almost all Paraguay’s soy harvest leaves the country by river.<sup>180</sup>

Growth in soy exports has propelled rapid development in the country’s fluvial infrastructure: in the last 30 years, its fleet has grown fifty-fold, from 100 to 5,000 ships.<sup>181</sup> Such development has made Paraguay “the undisputed leader in river navigation in Latin

America, and the third in the world, after the US and China.”<sup>182</sup>

By 2016, Paraguay had 26 river ports dedicated exclusively to moving soy: 16 on the banks of the Paraguay river, and ten on the banks of the Paraná river.<sup>183</sup> The biggest concentration looms over the Paraguay as it skirts the west of Asuncion. Cargill (Port Union), ADM (Port Sara), and Russian giant Sodrugestvo (SARCOM) all operate private ports in this area, while a huge processing plant and port named CAIASA is shared between US giant Bunge, French trader Louis Dreyfus Company, and COPAGRA, the Paraguayan subsidiary of Argentinean agribusiness behemoth AGD.<sup>184</sup>

At these and other ports, soy is loaded onto barges for the long journey downriver. Their destination is usually the Argentine city of Rosario, the biggest soy export hub in the world,



A soy barge heads upstream past the CAIASA soy port Bunge shares with other traders on the River Paraguay, south of Asuncion. *Global Witness*



ADM's Port Sara, 40km south of Paraguay's capital city Asuncion, from where the company barges soybeans and soybean meal for export. *Global Witness*

where ports and processing plants line 70km of riverbank.<sup>185</sup>

Here, the commodity traders operate ports for transshipping Paraguayan soymeal: ADM has a facility named Muelle El Tránsito,<sup>186</sup> Cargill has Muelle Quebracho,<sup>187</sup> and Bunge and COPAGRA/AGD share a site called Terminal Six.<sup>188</sup> Further downriver, ADM also operates a transshipment terminal in Nueva Palmira, Uruguay.<sup>189</sup>

In Rosario, whole Paraguayan soybeans are crushed and reexported as Argentinean soymeal, meaning millions of tonnes of Paraguayan soybeans disappear annually into Argentina's vast soymeal crush.<sup>190</sup> Paraguayan soymeal, meanwhile, is transferred at the traders' transshipment ports onto the huge bulk carriers which deliver it to buyers across the globe – with Europe as the principal destination.

## **MEATY SUPPLY CHAIN 1: 2 SISTERS**

Our investigation tracked the journey of Paraguayan soymeal from the transshipment

facilities of ADM, Cargill and Bunge to animal feed firms that supply two of Europe's biggest meat companies: 2 Sisters, in the UK; and Danish Crown, in Denmark.

2 Sisters was founded in 1993 by Ranjit Singh Boparan, a butcher's assistant who left school at 16. Since then, it has grown into the UK's biggest chicken manufacturer,<sup>191</sup> processing more than ten million birds a week and supplying a third of all the chicken products consumed in the country.<sup>192</sup>

Paraguay is a key source of soy for 2 Sisters' chicken feed, following the firm's own soy sourcing policy, which states: "Over many years 2SFG experience [sic] has been that Brazilian / Paraguayan soybean meal has been of superior quality to alternative sources."<sup>193</sup>

This policy also states that all the soy in 2 Sisters' chicken feed is supplied by three traders that dominate the flow of Paraguayan soy into Europe. These firms are Cargill and ADM (the biggest and second biggest exporters of soy from Paraguay respectively), and Cefetra Group, a firm with UK operations, that is in turn owned by

BayWa Group, a German headquartered agri-commodity, energy and building materials giant. Cefetra has reported that 45% of its expected 2020 UK/Ireland soybean equivalent imports were of Paraguayan origin.<sup>194</sup>

Our investigation uncovered multiple shipments of Paraguayan soy to the UK by ADM, Cargill, and Bunge, including Bunge shipments to Cefetra. The Paraguayan soy in these shipments is purchased by UK animal feed manufacturers and used in the production of chickens which are slaughtered and sold by 2 Sisters.

These feed firms include 2Agriculture – a sister company of 2 Sisters also owned by the Boparan family<sup>195</sup> – and ABN, a feed firm owned by AB Agri, part of Associated British Foods.<sup>196</sup> Smaller volumes also likely flow to 2 Sisters via ForFarmers UK, a subsidiary of one of Europe’s largest animal feed conglomerates, ForFarmers BV.<sup>197</sup> 2Agriculture and ForFarmers UK recently announced plans to merge operations, giving ForFarmers a bigger share of the UK chicken market via 2 Sisters contracts.<sup>198</sup>

With the exception of 2Agriculture, which did not respond to our findings, none of these feed firms denied using Paraguayan soy from ADM, Cargill and Bunge (via Cefetra) when supplying 2 Sisters’ poultry feed.



2 Sisters’ processing plant at Willand, Devon, UK, where one million chickens are slaughtered every week. *Global Witness*

Our investigation uncovered two specific routes by which ADM’s Paraguayan soymeal reaches 2 Sisters’ chickens: one via Portbury, in south-west England; and one via Seaforth, next to Liverpool in north-west England.

### **ADM: The Portbury Nexus**

On 10 July 2022, a 200-metre-long merchant ship named the Shandong Fu You nosed into England’s Royal Portbury Docks. On board were 24,200 tonnes of Paraguayan soymeal, loaded three weeks earlier at ADM’s transshipment port in Nueva Palmira.<sup>199</sup>

The previous year, in 2021, two other ships had plied the same route: the Mandarin Phoenix delivered 10,000 tonnes of soymeal from ADM’s El Transito port to Portbury in December,<sup>200</sup> and the Amis Unicorn delivered 22,000 tonnes via the same ADM port in June.<sup>201</sup>

From Portbury, ADM’s Paraguayan soymeal is trucked to a pair of feed mills operated by ABN in the pretty Devonshire villages of Uffculme and Cullumpton, where it is mixed with other inputs like wheat and corn to produce chicken feed for 2 Sisters.<sup>202</sup>

This feed is trucked along narrow country lanes to the region’s cluster of intensive poultry units.<sup>203</sup> The flagship of these is Swanhams, a chicken mega-farm operated by Hook 2 Sisters, a joint venture between 2 Sisters and the hatchery PD Hook.<sup>204</sup> From the front gate, Swanhams Poultry Unit is an inconspicuous series of six wooden barns. A closer look, however, reveals that the wooden façade is maintained only at the front, and that the corrugated metal structures stretch back for over a hundred metres. Within each of them are 60,000 chickens, with the site as a whole holding 350,000 at a time.<sup>205</sup>

These chickens spend five to six weeks in the intensive poultry units before they’re ready for slaughter.<sup>206</sup> Collected by “catching gangs”,<sup>207</sup> they are stuffed into crates and stacked onto trucks for transport to 2 Sisters’ sprawling

processing plant in the village of Willand, where a million chickens are killed a week.<sup>208</sup>

Neither ADM, ABN, nor 2 Sisters refuted these findings when put to them.

### **ADM: The Seaforth Nexus**

Further up the English coast, 2 Sisters also sources Paraguayan soymeal from ADM facilities in the port of Seaforth, near Liverpool. So far in 2022, ADM has shipped at least 37,615 tonnes of Paraguayan soymeal to Seaforth in two consignments from its transshipment terminal in Nueva Palmira, Uruguay.<sup>209</sup>

From Seaforth, ADM's Paraguayan soymeal is trucked to a nearby feed facility in Llay, North Wales operated by 2Agriculture, the sister firm of 2 Sisters.<sup>210</sup>

From the 2Agriculture mill, chicken feed is delivered to Hook 2 Sisters' many sites in the area, including Treuddyn Poultry Farm and the firm's cluster of intensive poultry units in north-west Wales.<sup>211</sup> Chickens reared at these sites are slaughtered in 2 Sisters' flagship processing plant at Sandycroft, near Deeside, which also kills a million birds a week.<sup>212</sup>

### **Cargill**

Cargill also ships Paraguayan soymeal to Seaforth, via its Rosario transshipment hub of Muelle Quebracho. In 2021, Cargill shipped almost 60,000 tonnes of Paraguayan soymeal in three consignments to its facilities in Seaforth.<sup>213</sup> As with ADM, Cargill's soy, including that imported from Paraguay, is sold to manufacturers of animal feed used in 2 Sisters' chicken production, including 2Agriculture and ABN.

None of the companies that responded to our findings refuted these supply chain links when put to them. ABN told us it uses Cargill's 'Triple S' certification scheme.<sup>214</sup>

A substantial portion of Cargill's UK soy imports also feed the US giant's own integrated chicken operation, Avara Foods, a joint enterprise with the British producer Faccenda Foods. A recent investigation by Unearthed found that soy from Cargill's Seaforth plant is trucked first to the firm's poultry feed mills in Hereford and Banbury, and then on to Avara chicken farms.<sup>215</sup>

### **Bunge**

Finally, Bunge also ships Paraguayan soymeal to the UK. So far in 2022, the US giant has delivered three consignments amounting to 18,260 tonnes to the Belfast facilities of feed ingredients trader Cefetra.<sup>216</sup> Cefetra in turn sells soy, including Paraguayan soy supplied by Bunge and others, to firms fulfilling 2 Sisters' animal feed requirements, such as ABN and 2Agriculture.<sup>217</sup> None of these companies refuted these supply links when put to them.<sup>218</sup>

## **MEATY SUPPLY CHAIN 2: DANISH CROWN**

We also tracked the delivery of Paraguayan soy from ADM and Cargill to companies in the supply chain of Danish Crown, one of the world's largest exporters and one of Europe's largest producers of pork, and the largest meat-processing company in Europe.<sup>219</sup>

A cooperative owned by more than 6,000 farmers, Danish Crown slaughters 18 million pigs a year.<sup>220</sup> Its members rear these pigs in huge, highly



Seaforth Docks, Liverpool, where ADM and Cargill have received shipments of Paraguayan soy. A.P.S. (UK)/Alamy Stock Photo

technological facilities, necessary to keep Danish pork cheap for European and global markets.<sup>221</sup> Soy plays a central role in this production model.<sup>222</sup>

Paraguayan soy reaches Danish Crown's intensive pig farms via another Nordic agribusiness giant, Danish Agro. Danish Agro is one of Europe's ten biggest animal feed firms,<sup>223</sup> handling around 40% of Denmark's soy imports<sup>224</sup> and producing 2.8m tonnes of feed a year.<sup>225</sup> ADM is its number one soy supplier.<sup>226</sup>

We identified two shipments of Paraguayan soy from ADM's El Transito port in Rosario to warehousing facilities Danish Agro leases from Associated Danish Ports (ADP) in Fredericia,<sup>227</sup> a port town on Denmark's Jutland peninsula. Totalling 48,000 tonnes, the shipments arrived in June and December 2021: 20,000 tonnes aboard the Amis Unicorn, and 28,000 on the Mandarin Phoenix.<sup>228</sup>

From the docks, the soy is trucked to Danish Agro's feed factories. There, soy may be mixed with other inputs such as barley and wheat to make pig feed,<sup>229</sup> which is delivered to farms rearing pigs that supply Danish Crown's network of slaughterhouses.<sup>230</sup>

Danish Agro said it strongly disapproves of human rights and land rights violations, which

were contrary to its requirements, and that it had contacted its main soy supplier, ADM, and was awaiting the results of an investigation ADM was undertaking.

These slaughterhouses are also enormous sites; the firm's biggest is located in Horsens and kills 100,000 pigs a week, with meat-packing done in the same site.<sup>231</sup>

Danish Agro's principal rival in Denmark is DLG, another of Europe's biggest animal feed firms which imports 900,000 tonnes of soybean meal annually.<sup>232</sup> Cargill shipped 11,500 tonnes of Paraguayan soymeal to DLG in 2022, although DLG claimed it was not used for pig feed so did not supply Danish Crown.<sup>233</sup>

We also tracked a shipment of 30,000 tonnes of Paraguayan soy from ADM on the Apogee Endeavour, which unloaded on 22 April 2021 alongside facilities in Aarhus bulk terminal that multiple sources indicate are owned or controlled by DLG.<sup>234</sup> However, while DLG acknowledged the shipment occurred, it denied the soy was delivered to it or to a facility that it owns or operates.<sup>235</sup>

Like Danish Crown, both Danish Agro and DLG are also cooperatives owned by Danish pig farmers, many of which may also be owner-members of Danish Crown. Both feed firms have agreements



The Mandarin Phoenix, which delivered 28,000 tonnes of ADM's Paraguayan soybean meal to DLG in Fredericia, Denmark, on 22 December 2021. Peter Ward



Pig carcasses hanging in Danish Crown's Horsens processing plant, the company's biggest, Denmark. Alastair Philip Wiper-View/Alamy Stock Photo

with Danish Crown under which data on animal feed volumes and ingredients and pig sales to Danish Crown are monitored and shared.<sup>236</sup>

## ALL THE BIG BRANDS

2 Sisters' chicken and Danish Crown Group's Danish-originated pork are ubiquitous on high streets, supermarkets shelves, and in restaurant chains continent-wide, and consumed by tens of millions of European consumers every day.

We identified three fast food chains using 2 Sisters' chicken in the UK, at least 10 UK retailers that sell or until recently sold 2 Sisters and Danish Crown products, or using their meat, and a further 13 major retailers across France, Germany and Italy selling Danish Crown pork.

2 Sisters claims to supply Kentucky Fried Chicken (KFC) in the UK<sup>237</sup>. Nando's UK and Ireland<sup>238</sup> and McDonald's<sup>239</sup> are both also 2 Sisters customers.

2 Sisters names UK retailers Aldi, Asda, Co-op, Lidl, Marks & Spencer (M&S), Morrison's,

Sainsbury's, Tesco, and Waitrose among its customers in the UK,<sup>240</sup> although Waitrose told us it no longer sources from the firm.<sup>241</sup> Frozen-food giant Iceland is also reportedly a customer.<sup>242</sup>

These retailers use 2 Sisters for their own-brand products. Examples include Tesco's 'Willow Farms' line,<sup>243</sup> and M&S' 'GastroPub' brand of ready cooked meals.<sup>244</sup>

All these UK retailers also sell products manufactured by Danish Crown or subsidiaries of the group.

Danish Crown's tinned meat division, named Tulip, is one of the company's best known operations, producing over 130 million cans of meat annually.<sup>245</sup>

Tulip is licenced by the US consumer goods company Hormel Foods to produce its world-famous SPAM® brand of luncheon meat for the European market.<sup>246</sup> SPAM® is sold by many of the UK's biggest retailers, including Sainsbury's,<sup>247</sup>



The major European supermarkets and fast-food restaurants selling chicken or pork produced by 2 Sisters and Danish Crown respectively.



Tesco's 'Willow Farms' brand of chicken, and Marks and Spencer's 'GastroPub' brand of ready meals, both produced by 2 Sisters.

Tesco,<sup>248</sup> Asda,<sup>249</sup> Morrisons,<sup>250</sup> Co-op,<sup>251</sup> Waitrose,<sup>252</sup> and Iceland.<sup>253</sup>

Some UK supermarkets also offer products manufactured by Danish Crown's Tulip facilities under the Tulip brand itself, including Sainsbury's<sup>254</sup> and Tesco.<sup>255</sup>

Sainsbury's includes Tulip Food Company in Vejle, Denmark, in its January 2022 tier 1

suppliers list.<sup>256</sup> Its own-brand tins of 'lean ham'<sup>257</sup> and 'chopped pork and ham'<sup>258</sup> are made in Denmark with Danish pork, and the retailer did not deny these were made by Danish Crown.<sup>259</sup>

Lidl lists four Danish Crown entities, including two in Denmark (one of which is a Tulip facility) in a 2022 list of its suppliers.<sup>260</sup>

M&S has also sourced cooked and sliced pork for its own-brand products from Danish Crown's Tulip division,<sup>261</sup> and although the contract reportedly ended in 2019, M&S did not deny continuing to source pork from Danish Crown when contacted.<sup>262</sup>

Aldi UK is also supplied by Danish Crown.<sup>263</sup>

Tulip also markets a broad range of Pizza toppings, under the brand 'Super Tops'. These are marketed by UK-based catering wholesalers that sell to numerous independent pizza restaurants and manufacturers across the country.<sup>264</sup>

Beyond the UK, Danish Crown products and meat are also widely available to millions more consumers across mainland Europe.

In France, Tulip brand tinned meats, sausages, and ham are available at Carrefour,<sup>265</sup> Intermarché,<sup>266</sup> Monoprix,<sup>267</sup> and Auchan.<sup>268</sup> In Germany, they are sold in outlets of Edeka,<sup>269</sup> REWE,<sup>270</sup> NETTO,<sup>271</sup> Kaufland,<sup>272</sup> METRO,<sup>273</sup> Aldi Nord,<sup>274</sup> and Aldi Sud.<sup>275</sup>

Tulip facilities also produce tinned pork luncheon meat products under the 'Brookdale' brand, a trademark registered to Aldi Inc,<sup>276</sup> a US subsidiary of Aldi Sud in Germany.<sup>277</sup> Trade records indicate Danish Crown companies shipped thousands of tonnes of Brookdale pork products from Denmark to the US from 2017-2022, likely amounting to over 5 million cans over the period.<sup>278</sup>

Danish Crown also offers two main brands of raw pork cuts: its generic raw pork line 'Tender Pork',<sup>279</sup> and 'Pure Pork',<sup>280</sup> a line of antibiotic-free high animal welfare meat.

'Pure Pork' is offered as raw cuts by all 300 Decò supermarket outlets across Italy.<sup>281</sup>

'Pure Pork' is also used to manufacture the popular German 'Reinert HerzensSACHE' brand of pork products.<sup>282</sup> Owned by The Family Butchers, Germany's second biggest sausage and ham producer, Reinert HerzensSACHE is sold by many German supermarkets and many others across Europe.



Tinned pork products manufactured by Danish Crown are ubiquitous in major supermarkets across Europe.

Soy embedded in Danish Crown’s Danish pork business also reaches European consumers via Danish Crown subsidiary Sokotów, one of Poland’s largest meat company, including under the ‘Sokoliki’ brand.<sup>283</sup> Sokotów products are mainly sold in Poland, but are increasingly available in supermarkets across Europe, including in the UK at Sainsbury’s,<sup>284</sup> Tesco,<sup>285</sup> Morrison’s,<sup>286</sup> and Asda.<sup>287</sup>

As this non-exhaustive overview shows, Europeans consuming chicken or pork will almost certainly buy products manufactured by either 2 Sisters or Danish Crown – products that embed Paraguayan soy supplied by traders linked to human rights harms in Paraguay.

## SYSTEMIC HUMAN RIGHTS NEGLIGENCE

### Directly linked to the harms

Having established clear supply chain links between the actors involved, a key question arose from our investigation: is soy from farms we visited in Paraguay embedded in Danish Crown’s and 2 Sisters’ meat?

If it is, all the companies named in this report are ‘directly linked’ to the human rights harms impacting Paraguay’s Indigenous and campesino communities, according to international business and human rights standards.

These standards include the 2011 United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, as well as the 2018 OECD Guidance for Responsible Business Conduct and the principle of free and prior informed consent, which is central to the 2007 United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).<sup>288</sup>

Further, where companies display negligence in assessing, identifying, preventing or mitigating such human rights harms, these standards regard them as having ‘contributed to’ the harms - making them responsible for providing remedy to affected communities.

Our research suggests that all companies downstream of the big soy traders are at least at structural risk of being directly linked to, if not clearly directly linked to, the harms we uncovered

in Paraguay. Many companies also display many if not all the due diligence failings associated with contributing to the abuses.

Other than ADM – which claims its preliminary investigation, which it did not indicate had consulted the victims, concludes its suppliers are not causing abuse and no community lands overlap their farms – no other corporation named in this report refuted this assessment when put to them.<sup>289</sup>

Clearly, no one has provided remedy to the Ava Guarani, Mbya Guarani, or campesino communities impacted by industrial soy production in Paraguay, it appears.

## Such factors suggest the entire sector is failing in its responsibilities under international human rights standards.

### Organised opacity

The soy industry is overwhelmingly opaque.

A 2021 3Keel report covering soy embedded in products offered by a collection of major retailers, displays the lack of transparency in the sector all too clearly.

It found that, of the estimated 1.63 million tonnes of soy embedded in meat products in the UK and Europe sold by the retailers in 2020, only 38% had some kind of ‘no deforestation’ claim attached to it (62% had none), retailers could trace only 41% to a named soy trader, and 72% had either no evidence or insufficient evidence of the country of origin.<sup>290</sup>

In researching this report Global Witness sent soy sourcing surveys to over 30 animal feed, retailer, and consumer goods firms selling 2 Sisters and Danish Crown products across Europe, as well as to the two meat firms themselves, requesting information on the volumes, origin, traceability, and sustainability certification of their soy.<sup>291</sup>

Most firms did not respond. Of the 15 that did, not one single company was either willing or able to provide information detailed enough to allow for meaningful analysis of the company’s sourcing of Paraguayan soy. Nonetheless, many still proclaimed the sustainability policies they were committed to or the industry initiatives they had signed up to.

### A cascade of negligence

The European industrial meat sector’s reliance on cheap soy for animal feed has been a principal driver of human rights and environmental harms across Latin America for years.

The big soy traders, including ADM, Cargill and Bunge, have almost invariably been the central conduits of complicity in this long history of harm.

Their purchases of soy tainted by human rights violations in countries like Paraguay constitute serious and repeat failings under international business and human rights standards.

The traders’ control of the highly opaque supply of soy to Europe means most if not all actors downstream of them in Europe’s protein value chain all too readily inherit their failings.

Through their own negligence, European corporate actors downstream of the traders have for years also contributed to harms of the type we documented in Paraguay.



Consumers risk contributing to human rights abuses in Paraguay when buying pork and chicken sold by dozens of major European retailers. *René van den Berg / Alamy Stock Photo*



A Conveyor belt feeding hoppers as a soy export terminal owned by Cargill. *Tarcisio Schnaider / IStock*

This includes virtually all types of large actors involved in the European meat industry: from the animal feed companies and the mega-farm operators they supply, through the big chicken and pork processors, to the big-brand retailers, fast food chains and consumer goods firms that market meat products to millions of European consumers.

### **An age of unregulated 'responsibility'**

In light of numerous exposés of deforestation and human rights abuses in soy supply chains,<sup>292</sup> the industry has adopted a range of voluntary company policies, industry initiatives, and certification schemes to help clean up their supply chains.<sup>293</sup>

Yet these voluntary approaches have repeatedly failed to stem the flow of tainted soy embedded in cheap meat to the dining tables of European consumers. In order to maintain industrial-scale volumes of soy, companies have allowed pragmatism to trump principle at almost every turn.

The policies and practices of the companies involved in the meat value chains of 2 Sisters and Danish Crown are just another case in hand.

Nearly all the European companies named in this report are members of industry initiatives, or espouse policies purporting to ensure they do not, or are working to ensure they will not, accept tainted soy.

Both Danish Crown and 2 Sisters are, for example, signatories of perhaps the most recent and coordinated voluntary industry initiative to clean up the sector: the UK Soy Manifesto, launched in November 2021. Many relevant major UK retailers and restaurant brands are cosignatories.<sup>294</sup>

Manifesto signatories have or are now adopting policies committing to “ensure all physical shipments of soy to the UK are deforestation and conversion free” and to do so by “no later than 2025.”

Importantly, the Manifesto is “aligned” with the Accountability Framework Initiative (AFI), thereby embodying the AFI’s standards on human rights and Indigenous and local community land rights, including FPIC.<sup>295</sup>

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As none of the signatories import soy into the UK (no major traders or feed firms are involved), companies aim to realise the Manifesto's goal by committing to 5 core actions they can feasibly deliver, including setting a 2025 deforestation-free commitment with an action plan and asking direct suppliers to adopt and cascade this same commitment.<sup>296</sup>

The critical mass of companies involved in the Manifesto initiative is indeed unprecedented and has a chance of driving positive change in the whole European sector, not just in the UK.

Nonetheless, beyond the ambition and scale of membership, there are strong reasons to expect that the headline goal will not be achieved, and that tainted soy produced on farms like those we visited in Paraguay will continue to be embedded in products sold by signatory members, even after 2025.

The direction of travel of 2 Sisters displays the red flags all too clearly.

Since signing the Manifesto in 2021, in June, 2 Sisters published a revised 2022 soy purchasing policy that mirrors its 2021 policy very closely.<sup>297</sup>

2 Sisters explicitly reiterates its preference for Paraguayan and Brazilian soy, sending a clear market incentive to suppliers to prioritize imports from the two highest risk soy-producing countries on earth.

Yet its policy also specifies that 100% of the South American soy meal used in 2 Sisters' poultry feed is covered by 'three zero deforestation sourcing standards', namely, ADM's, Cargill's, and Cefetra's sustainability certification schemes.<sup>298</sup>

While that sounds good, 2 Sisters specifies that these certifications are currently 'all basis [sic] Area Mass Balance or Mass Balance', and, by 2025, 100% of its soy meal is hoped to be mass balance certified.

With just these eight words, 2 Sisters' first soy policy since signing the UK Soy Manifesto

guarantees that the Manifesto goal to 'ensure all physical shipments of soy to the UK are deforestation and conversion free' will not be met, at least where land rights and human rights are concerned.

2 Sisters' acceptance of mass balance certification ensures that much of the soy it uses up to and beyond 2025 will include material produced on farms not certified under the three zero deforestation schemes its policy specifies, or likely meeting their respective sustainability standards.

This is because 'mass balance' certification schemes are, in effect, accounting tricks used by the industry to legitimise soy not verified to meet the sustainability standards they proclaim.

### **Compromised on balance**

Under 'mass balance' or 'area mass balance' chain of custody certification systems, ADM, Cargill, and Cefetra source soy from farms audited to meet their sustainability standards, but also from farms that are not certified and may not meet the standards.

Soybeans from both certified and uncertified farms can be and usually are mixed together – in warehouses, ships or grain elevators, or when crushed together in mills to produce soybean meal and soy oil – with a proportion of the resulting blend sold to customers as nominally certified, despite containing uncertified material.

On balance, the volume of mixed product sold as certified must not exceed the volume of soy purchased from certified farms; if a trader buys 10% from certified farms and 90% from non-certified or non-compliant farms, 10% of its overall sales can be sold as certified.

Yet, by design, this nominally certified soy can, does and almost always will incorporate soy from any uncertified farms that a trader sources from, including any operated in violation of the rights of Indigenous and campesino communities, such

as those in Paraguay we visited, or from farms involved in deforestation, for example.

Other than ADM, none of the companies named in this report refuted this assessment when put to them. ADM suggested that ‘ADM does not mix soy, but is aware that any “bulk” commodity handled at large scale will naturally comingle’.<sup>299</sup>

Nonetheless, notwithstanding ADM’s semantic games, ADM’s own proprietary Responsible Soybean Standard (specified by 2 Sisters) explicitly says that under its mass balance offer:

**“It is allowed to mix a verified crop with the same species of an unverified crop”**

Archer Daniels Midland, ‘Responsible Soybean Standard’, Version 2.<sup>300</sup>

While ‘mass balance’ schemes require at least some soy in every certified consignment to come from certified farms, under ‘area mass balance’ schemes this is not the case, and individual consignments need not contain any soy from certified farms, provided volumes sold as certified do not exceed volumes sourced from certified farms.

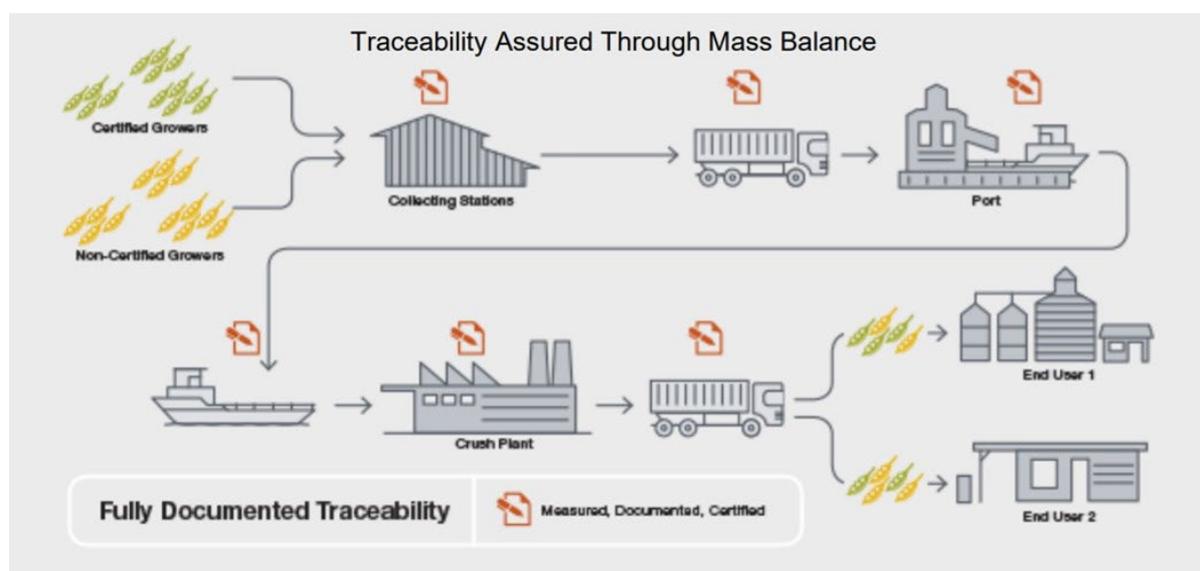
Cefetra’s CRS scheme, which only offers ‘area mass balance’ chain of custody, admits its system “can result in a very low amount or even no actual certified commodities in a shipment.”<sup>301</sup>

Increasing demand for mass balance certified soy can increase demand for certified soy, and in theory incentivises more farmers to enter sustainability certification. This is good, or at least as good as the audits involved.

However, mass balance certification does not in any way ensure the exclusion of soy from high risk or non-compliant farming operations, and, in fact, ensures soy from such sources can and likely will continue entering value chains that use it indefinitely. Risk is structurally locked in.

In this way, for as long as companies operating them continue buying from sources implicated in grave human rights abuses, as the traders in this report do, mass balance schemes will not exclude soy from those sources, and instead function to falsely certify soy that in fact comes from uncertified sources.

The segregation of certified and uncertified soy is the most credible way to ensure the exclusion of soy from undesirable sources, but Europe’s meat



The visual schematic of how Cargill’s ‘Mass Balance Model’ for the company’s ‘Triple S - (Sustainably Sourced and Supplied) Soy’ certification program works, making all too clear how soy from uncertified farms is mixed into certified consignments. The scheme, and similar mass balance schemes used by the traders ADM and Cefetra, underpins 2 Sister’s soy procurement. *Cargill*

and retail industry, swayed by resistance from the soy traders and feed manufacturers, cost considerations and an indefinite lack of segregated soy, are apparently not insisting on it, if even specifying it.

Again, pragmatism is trumping principle where human rights are concerned.

The acceptance of mass balance certification by the most progressive voices in the industry as a whole, including UK supermarkets, locks in the UK as a destination market for any farmer from whom ADM, Cargill, Cefetra, and its supplier Bunge, buy soy.

This includes soy from farmers directly causing the most egregious and criminal human rights and environmental harms against vulnerable communities like the Ava Guarani of Ka'a Poty, the Mbya Guarani of Hugua Po'i, or the campesinos fighting for their rights and lives in Yeruti and Yvype.

No UK Soy Manifesto signatory that is selling 2 Sisters chicken embedding mass balance-

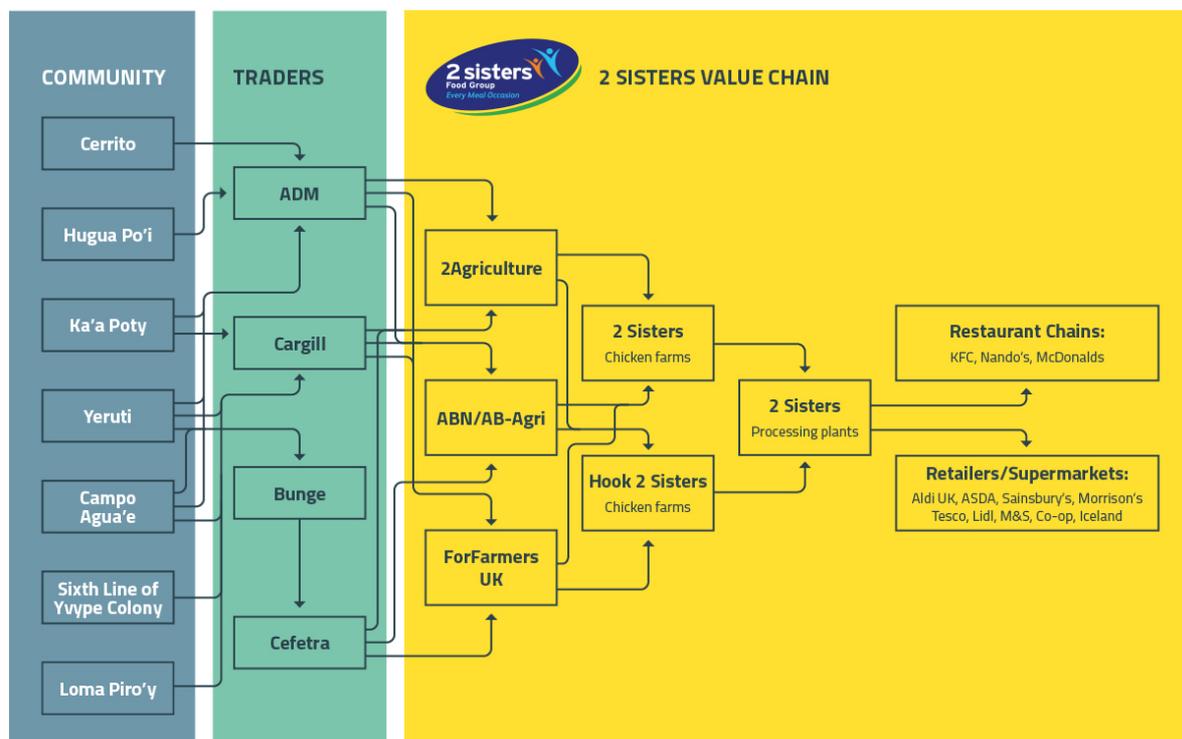
certified Paraguayan soy knows whether they are or will continue using soy sourced from any of the farms visited by Global Witness. This will still be the case even after the Manifesto's 2025 end goal.

Neither 2 Sisters, nor any of the 10 UK retailers or 3 fast-food brands selling its chicken products, disputed this assessment when put to them by Global Witness. All but one are UK Soy Manifesto signatories.

**Consequently, virtually every UK consumer of chicken risks buying products contaminated with soy produced on farms operated by farmers causing human rights harms in Paraguay, or elsewhere.**

2 Sisters told us it was 'concerned' about the links to rights abuses in Paraguay we had identified and had asked its suppliers to respond. It said the mass balance schemes it specifies are "recognised as a means to make improved standards of production more readily achievable for farmers' and are benchmarked against the

How 2 Sisters' and its retail customers' supply chains risk contributing to human rights abuses in Paraguay



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European Feed Manufacturers Association (FEFAC) Soy Sourcing Guidelines”.<sup>302</sup>

This is true, because those industry recognitions and FEFAC’s guidelines allow tainted soy to be laundered into certified consignments via mass balance schemes.<sup>303</sup> Indeed, FEFAC has proactively lobbied the EU to ensure proposed regulation on deforestation allows untraceable, non-segregated, and non-certified soy from farms like those we visited in Paraguay to be shipped to Europe mixed into mass balance certified consignments (See ‘Lobbying for lax legislation’, below).

Nando’s did not refute any of the allegations we put to it, but a spokesperson said “a sustainable and ethical supply chain is integral to our business. We work closely with our suppliers who, like us, take their responsibilities for soy sourcing seriously. We have robust protocols in place to make sure the production of soy remains in line with the required standards. We’ve also signed the UK Soy Manifesto and continue to work hard to implement this.”<sup>304</sup>

A KFC Spokesperson said: “We have very clear requirements of our suppliers regarding ethical sourcing, and the wellbeing of our people – and all those across our supply chain – is always a top priority. We’re a key signatory of the UK Soy Manifesto and are committed to ensuring that the soy in our supply chain is sourced responsibly, so we take these accusations very seriously. We appreciate Global Witness for bringing this to our attention and we will continue to stay close to the situation.”<sup>305</sup> McDonald’s did not respond to our findings.

Of course, the problem is not just with the UK and 2 Sisters and chicken. The same schemes are at play in Danish Crown’s pork value chain and the sales of its products by retailers across Europe.

European retailers have formed sustainability initiatives similar to those in the UK.

The French Soy Manifesto, signed in late 2020 by leading retailers in that nation (including those selling Danish Crown products named above), also commits signatories to ‘mobilise their own-brand suppliers from January 2021, to include a contractual non-conversion/deforestation clause ... in the specifications’ reflecting a January 2020 deforestation cut-off date.

However, this manifesto focusses primarily on the retailers’ own-brand products, and a commitment to ‘Support the implementation of these commitments by national brands’ would not obviously apply to Danish Crown.<sup>306</sup>

In Germany, many of the retailers stocking Danish Crown products signed a Declaration in 2020 calling out soy trader’s purchases of grains linked to deforestation. However, the declaration relates only to Brazil.<sup>307</sup>

DUH (Deutsche Umwelthilfe /Environmental Action Germany), a leading NGO, assessed supermarket policies on soy in a July 2021 report covering all the chains we mention above. It found ‘none of the companies examined can be rated well’, and that the supermarkets ‘score particularly poorly in the criteria of traceability, standard quality, and transparency.’<sup>308</sup>

Much work clearly still needs to be done.

While Danish Crown has not publicly detailed specific certifications or standards required to meet its UK Soy Manifesto commitments or its ‘soy action plan’ (developed in 2020 in cooperation with the Danish Alliance for Responsible Soy), the same principal soy traders, ADM and Cargill, dominate Danish imports of Paraguayan soy.

The same risks of mass balance certification schemes contaminating Danish pig production with soy from the Paraguayan farms violating human rights exists in Danish Crown’s business as it does for 2 Sisters’. The only major risk difference is the lower overall volume and

proportions of imports of Paraguayan soy into Denmark than in the UK.

The two dominant animal feed firms used by Danish pig farmers supplying virtually all pigs processed by Danish Crown, namely DLG and Danish Agro, both accept leaky mass balance certification schemes that mix certified and uncertified soy, and appear set to do so even after 2025.

Neither of Danish Crown’s two principal animal feed suppliers disputed that they regard mass balance certified soy to constitute ‘physically certified’ and ‘verified responsibly sourced’ soy – the publicly stated (albeit vaguely defined) end-goal of their supposedly ‘ambitious’ soy action plans to 2025.<sup>309</sup> This is despite all the evidence that unverified uncertified and high-risk soy is systematically mixed in.

As with 2 Sisters, neither Danish Crown or Danish Agro, nor any of the 26 major UK, French, German and Italian retailers, or the consumer goods firms we identified to sell or use Danish Crown pork

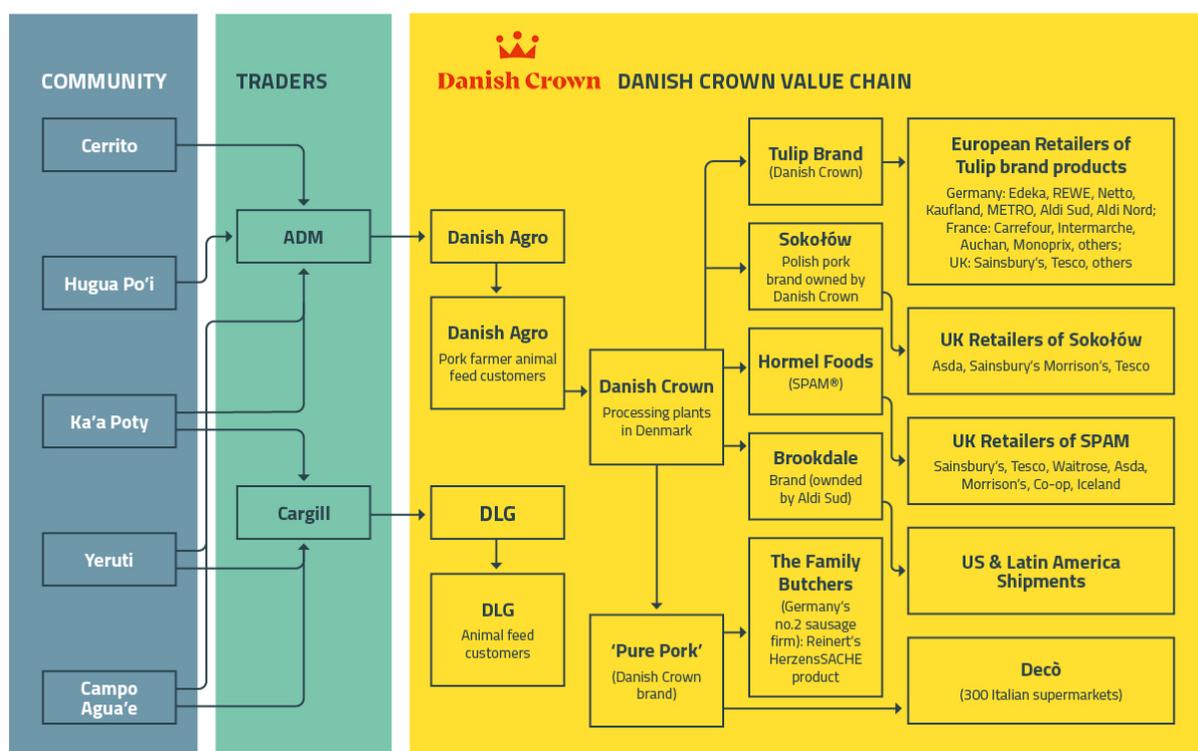
refuted our assessment that they do not know whether they use or will continue using soy from the farms we visited in Paraguay from which ADM sources. Only DLG denied receiving any Paraguayan soy from ADM in recent years.

There is no suggestion that the various supermarket and restaurant chains named above were aware of the human rights harms in the supply chains detailed in this report.

Yet their the absence of awareness is in itself part of the problem. It is reasonable to conclude that, even under coordinated well-publicised industry sustainability initiatives such as the UK Soy Manifesto, virtually the entirety of the European meat and retail sectors have decided to retain risk of human rights harms in their supply chains, many apparently indefinitely, in what constitutes coordinated pre-meditated negligence dressed up as responsibility.

Responding to our findings, Danish Crown told us it would commission a third-party review of its supply chain, review its current soy policy, and

**How Danish Crown’s and its retail customers’ supply chains risk contributing to human rights abuses in Paraguay**



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‘strengthen our focus upon deforestation, human rights, and land use, depending on the 3rd party review’. The company also pledged to ‘ask Danish feed companies to be transparent and give Danish Crown access so we can follow specific shipments of soy’.

Danish Crown also explained that, because it ‘recognises the challenges of establishing sustainable and transparent soy value chains’, the firm will purchase RTRS credits ‘until sustainable physically segregated soy is available’. It said it would do this ‘to emphasize that we want sustainable and transparent soy production and to make it clear that sustainable value chains do not yet exist on a large scale’. The company did not state, however, whether it did currently specify segregated certified soy.<sup>310</sup>

The statements appeared to suggest Danish Crown planned to offset its unsustainable soy footprint with RTRS credits, and do so to show that it was not able to ensure its soy was sustainable.

Nonetheless, in a statement issued to its customers responding to our research, the company was more explicit, stating that ‘by 2025 we want physically segregated soy for all slaughter animals from our cooperative owners’.<sup>311</sup>

Whether these UK and EU companies now act to remove these structural human rights risks from their supply chains will be the real test of whether they truly intend to meet the responsibilities under international human rights standards they all profess to uphold, or if commercial considerations will continue compromising compliance.

## The regulatory deficit

Where voluntary corporate responsibility repeatedly fails, regulation is required.

In recent years, the European Commission has been developing two flagship pieces of legislation mandating supply chain due diligence measures

for European companies. These include a proposed regulation focussed on eliminating deforestation and degradation<sup>312</sup>, and a proposed directive to eliminate human rights and environmental harms from EU value chains.

Both initiatives recognise agriculture as a high-risk sector, apply to soy and derived products, and could and should safeguard human rights, Indigenous and local community land rights, and the principle of free and prior informed consent (FPIC). Nonetheless, whether they will sufficiently do so remains uncertain.

The European Parliament is working – in the face of industry lobbying (see Lobbying for Lax Legislation’, below) – to ensure the European Commission’s proposed regulation on deforestation is strengthened to incorporate requirements on internationally recognised human rights, including Indigenous peoples and other customary rights-holders.<sup>313</sup> Yet such basic requirements would only apply to soy where deforestation has recently occurred, rendering the law irrelevant for the serious human rights cases in this report.

This leaves the proposed directive on human rights and the environment to fill the gap in European law.

In February 2022, the European Commission released a draft law to promote corporate accountability by requiring companies to assess their impacts on people and the planet. The *Corporate Sustainability Due Diligence Directive (CSDDD)*<sup>314</sup> could require companies operating in the EU to conduct due diligence to identify, prevent, mitigate and remedy human rights and environmental risks associated with their activities.

While civil society organizations, including Global Witness, have welcomed this proposal, it remains to be seen whether it will provide sufficient accountability for egregious human rights abuses in EU soy value chains.

The proposal does require large companies to undertake due diligence on their supply chains, including those abroad. However, multiple loopholes in the text would likely allow big soy traders like ADM and Cargill, and EU companies using soy they buy, to devolve this responsibility onto smaller suppliers or avoid it entirely.

The current draft directive would require companies to assess only the activities of suppliers with whom they have lasting business relationships, ignoring the structure of many value chains that rely on short-term business structures and multiple smaller suppliers. Consequently, the big soy traders may not even be obliged to do due diligence on suppliers such as those in this report.<sup>315</sup>

### **Further, the EC's draft allows companies to rely on shaky mechanisms to meet the due diligence obligations it defines.**

The proposal allows companies to rely on contracts to fulfil their obligations – which could allow them to simply shift the responsibility for carrying out due diligence as well as upholding human rights and environmental standards onto suppliers and other actors in the value chain.<sup>316</sup>

The Commission's proposal also allows companies to rely on unreliable mechanisms such as third-party verification and industry initiatives to help fulfil their due diligence obligations and demonstrate compliance.

Such mechanisms have been used by corporates exposed in this report even when abusive practices persist.

Mass balance certifications benchmarked by FEAC's Responsible Sourcing Guidelines and used in industry initiatives like the UK Soy Manifesto or equivalent initiatives in Denmark, France, and other European countries adopted by corporates in this report, may be deemed acceptable and absolve companies of their

responsibilities – even when abuses continue in their supply chains.<sup>317</sup>

Finally, the published draft does not recognise stakeholders, including Indigenous communities or land and environmental defenders, as vital actors with whom companies need to engage continuously. The draft merely states that they should be consulted only "where relevant".

It is essential that the legislation recognises Indigenous rights, including land rights established in international law (e.g., the right to exercise free, prior, and informed consent) and mandates meaningful engagement with impacted and potentially impacted communities as part of a company's ongoing due diligence processes.

Unless the proposed human rights due diligence directive is significantly strengthened, both of the EU's landmark due diligence legislative initiatives – on deforestation, and human rights and the environment – will fail to bring credible corporate accountability to the soy traders, animal feed companies, mega farm operators and meat processors covered in this report, or the big-brand retailers that underpin the multibillion-dollar industrial meat sector across Europe.



European Commissioner for Justice, Didier Reynders, whose Directorate General for Justice is responsible for the proposed EU Corporate Sustainability Due Diligence Directive. *Alexandros Michailidis/Alamy Stock Photo*

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## The UK also needs to play its role in closing its market to human rights abuse, as our investigation reveals.

There is growing momentum behind calls from both civil society<sup>318</sup> and major investors<sup>319</sup> for the adoption of mandatory corporate human rights due diligence legislation in the UK that is aligned with UN and OECD standards, and polling suggests four in five UK citizens support such legislation<sup>320</sup>.

The Environment Act 2021, passed in November 2021, also embodies scope to prohibit UK companies from importing or using soy linked to human rights abuses or illegal land use. Schedule 17 of the Act prohibits UK regulated persons from using illegally produced commodities where ‘relevant local laws’ are not complied with and defines ‘relevant local laws’ as those relating to the ownership and use of the land on which the commodity was produced.<sup>321</sup> Many of the cases of illegal land ownership, illegal pesticide use, and violent forced evictions of the kind detailed in our investigation should be within scope. However, Schedule 17 will not be enforceable until ‘regulations made by the Secretary of State’ have been passed. The timetable for such regulations remains uncertain.

### Lobbying for lax legislation

Multiple companies central to the soy supply for both 2 Sisters and Danish Crown have influential roles in trade bodies that have lobbied to weaken European Union due diligence requirements on soy in ways that would perpetuate human rights risk in Europe’s soy supply.

In March 2022, Unearthed, Greenpeace UK’s journalism project, revealed how, in October and November 2021, including during the Glasgow climate summit, Fediol - the EU Vegetable oil and protein meal industry association, and Cocal - the European cereals and oilseeds traders association, joined the EU animal feed manufacturers federation, FEFAC, in lobbying the European Commission Executive Vice President

for the European Green Deal, Frans Timmermans, and senior officials in the European Commission’s Environment ministry.

The trade federations argued that ensuring traceability to geolocated farms – essential to identify deforestation and human rights risk – presented privacy and commercial confidentiality problems for companies involved. They also argued that segregating deforestation-free commodities from those linked to deforestation – equally important in eliminating deforestation from supply chains – would push up prices and reduce sources of supply. The groups urged the EU to remove both requirements from a proposed EU regulation on deforestation.<sup>322</sup>

The policies advocated by the trade groups would ensure companies could continue trading soy produced through deforestation and/or human rights abuses into the EU single market despite the regulation nominally prohibiting it.

They would hold open the door for the ‘mass balance’ certification schemes used by ADM, Cargill, Bunge, and Cefetra, and accepted by European meat firms and retailers.

ADM, Cargill, Bunge, Cefetra, DLG and Danish Agro all hold influential management positions in these European trade bodies, or in national bodies with significant influence over them.

Fediol’s President is a Bunge executive, while its Vice-President is currently a Cargill executive, having previously been an ADM executive.<sup>323</sup> Cocal’s Vice-President is a Cefetra executive and the company sits on its corporate board, along with Bunge, Cargill, and ADM.<sup>324</sup> The current President of the board of FEFAC is an ex-CEO of DLG who now holds the position of the Director of the Secretariat of Dansk Korn & Foder (DAKOFO), the Danish grain and feed industry association.<sup>325</sup> DAKOFO’s board includes 5 current DLG executives and 2 Danish Agro executives, with a DLG executive acting as DAKOFO Chairman and a Danish Agro executive

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as Deputy Chairman.<sup>326</sup> DAKOFO is also represented on the board of Coceral.

Bunge told Global Witness that it ‘strongly refutes’ any suggestion its role has been to weaken the upcoming EU deforestation rules.<sup>327</sup>

When the European Parliament overwhelmingly voted, in a 13 September 2022 plenary vote, to strengthen an EC proposal on the deforestation regulation to include traceability back to where the products were harvested or produced,<sup>328</sup> all three trade bodies issued a statement expressing their ‘regret’ at the measure.<sup>329</sup>

## RECOMMENDATIONS

### The EU should:

Ensure that the Corporate Sustainable Due Diligence Directive (CSDDD) becomes an effective mechanism for holding corporates accountable and is not undermined by reliance on ineffective third-party verification systems, certification schemes and contractual assurances, or by the absence of meaningful stakeholder engagement. The CSDDD should:

- > Replace references to “established business relationships” with “business relationships” as defined in the United Nations Office of the High Commissioner for Human Rights (OHCHR) Corporate Responsibility to Respect Interpretive Guide.
- > Remove references to third-party verification and emphasize that the due diligence duty and liability for non-compliance with the Directive lie with the company.
- > Require that companies engage safely and meaningfully with all stakeholders, including Indigenous communities and land and environmental defenders, on an ongoing basis to inform all stages of due diligence and remediation with the objective of identifying and preventing risks and adverse impacts on human rights and the environment.
- > Make clear that due diligence and corresponding requirements on stakeholder

engagement should support, but in no way replace or undermine existing FPIC duties and other rights established under the ILO Convention 169 and UNDRIP, including rights of Indigenous Peoples not to be removed from their lands or territories; their right to redress or compensation for land rights violations; and their right to exercise FPIC.

### The UK government should:

- > Introduce mandatory human rights and environmental due diligence legislation for UK businesses, including financial institutions, that are aligned with UN and OECD business and human rights standards.
- > Urgently bring forward secondary regulations of the Secretary of State mandated by Schedule 17 of the Environment Act 2021, to ensure UK businesses do not import or use soy produced in ways that do not comply with ‘relevant local law’ on land ownership and use in countries such as Paraguay.

**Companies**, including those named in this report which are trading soy or products derived from it such as animal feed, livestock, or meat, should:

- > Urgently act on the findings of this report, including ensuring that no further harms take place (such as illegal and violent evictions, restrictions on access to land, and illegal fumigations), that affected communities receive adequate remedy, and contracts are terminated with actors who continue to cause or contribute to harms or fail to prevent or remedy harms in their supply chains.
- > Prioritise investment in human rights and land rights due diligence to bring policies and practices into line with international human rights and Indigenous rights standards. This includes:
- > Establishing safe, effective, transparent and accessible grievance mechanisms and conflict mediation procedures aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) that provide protections for human rights, land and environmental defenders and whistle-blowers and enable provision of swift remedy.

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- > Increasing transparency across business operations, including publicly reporting actions undertaken under grievance mechanisms and the results of remediation, providing access to information for affected communities in accessible languages and forms.
  - > Strictly implement a policy of zero-tolerance on reprisals and attacks on land and environmental defenders at all levels of business operations, including in their global operations, supply chains and business relationships. These policies should include protocols for safeguarding the rights of land and environmental defenders and state who at the senior level will be responsible for legal compliance, as well as how it will be implemented and monitored, and clear red lines for prompt suspension or termination of contracts for non-compliant suppliers.

**The government of Paraguay should:**

- > Investigate the cases of illegal land grabbing, illegal and violent forced evictions, illegal pesticide use, and their impacts on the Indigenous and Campesino communities detailed in this report, and prosecute individuals found to have violated relevant laws and the rights of the communities concerned.
- > Ratify and implement the Regional Agreement on Access to Information, Public

Participation and Access to Justice in Environmental Matters in Latin America (the Escazú Agreement), including specific measures espoused in Article 9 to recognise, protect and promote human rights and environmental defenders.

- > Revoke Law No. 6830/2021, known as the Zavala-Riera law after the Senators who tabled it, and refrain from using legal mechanisms, including criminal law, from repressing those defending their land rights and the environment.
- > Establish a clear mechanism, with financing and coordination across state and other institutions, in which Indigenous peoples can pursue ancestral land claims, as called for in a [2010 ruling](#) from the Inter-American Court of Human Rights.
- > Implement the recommendation of the United Nations Special Rapporteur on the right to food to introduce taxes on the export of grains, including soybeans, to increase income for social spending.

Increase funding for state bodies responsible for implementing agrarian reform, upholding Indigenous land rights, and enforcing environmental regulations, especially soybean fumigation. Ensure that those who break the regulations, including state actors, are duly sanctioned.

## ANNEX

### Summary of company responses to Global Witness' request for comment on links to community case studies in this report

Company	Community Conflict	Extracts from Company response to Global Witness findings
<b>2 Agriculture</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	2Agriculture did not respond to Global Witness' findings.
<b>2 Sisters</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	2 Sisters said it was 'concerned' by the cases we had raised and asked its suppliers to respond. It said its sourcing standards were 'benchmarked against the European Feed Manufacturers Association (FEFAC) Soy Sourcing Guidelines' and that 'Certification using mass balance systems is recognised as a means to make improved standards of production more readily achievable for farmers.'
<b>AB Agri</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	AB Agri said it took the allegations very seriously, was working with its partners to investigate them, and that, should its expected standards not be met it would 'work with our suppliers to take appropriate action'. It said it is committed to responsibly sourcing raw materials, and that all Paraguayan soya meal used in its products is certificated using FEFAC approved responsible sourcing schemes, independently audited by Control Union. It said these schemes include specific standards on human and labour rights.
<b>ADM</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	ADM said the allegations were serious, violated its Code of Conduct and policies, and opened an investigation immediately. It admitted it 'sources soy directly and/or indirectly from some of the names listed in GW's report' but did not state which ones or deny any specific cases. It said its traceability tools indicated 'none of the properties/farms (polygons) belonging to suppliers that source soy for ADM overlap, or encroach in any way, with either Indigenous Territories or community settlements of smallholders. None of the farms from where ADM sources soy suffered evictions.' It said all suppliers interviewed 'denied the accusations of illegal use of agrochemicals, illegal land grabbing, using violent forced evictions and/or the destruction of community housing and property,' although 'some did admit that there is tension with local neighbouring communities'. ADM argued that as its investigation - which it did not say had consulted the victims - concluded the human rights allegations were 'inaccurate', and therefore 'there is no risk of having ADM's customers in Europe exposed directly, or indirectly (embedded soy), to such issues - regardless of using or not a mass balance scheme.' On its tax payments in Paraguay, it said 'ADM Paraguay contributes to the Paraguayan treasury just as it is expected'. On its lobbying to influence EU deforestation regulations, it said, 'by no means should be interpreted as a way to weaken the upcoming legislation' and that it sought to 'inform what happens throughout the multiple steps of the soy supply chain'. On 13 September ADM said Global Witness would see a record of its investigation in its public grievance log 'in the next few days'.

Company	Community Conflict	Extracts from Company response to Global Witness findings
<b>Aldi Nord</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	Aldi Nord said the company was 'aware of our responsibility to respect human rights along our supply chains in accordance with the UN Guiding Principles on Business and Human Rights (UNGP).' It said 'In our International Policy for Human Rights, we commit to respecting all internationally recognized human rights', and that 'we prioritize the most serious adverse human rights impacts and risks, which include respect for the rights of Indigenous peoples and local communities.' The company 'believe transparency is an important component of human rights due diligence', and 'have processes in place to improve our understanding of our supply chains'. It reported 'we expect our business partners and other suppliers to also respect human rights and ensure that their business activities comply with our human rights and environmental standards'. It said, 'supply chains for soy in animal feed are very complex and it is challenging to trace the soy back to its origin.' It said it had been 'working with other retailers and our suppliers on processes to build knowledge and traceability about the origin of animal feed since 2021', and that its goal was to 'source 100 per cent sustainable soy by 2025, either from certified sources or from low-risk regions'. It said, 'it is impossible for ALDI Nord to solve these issues alone' and that, therefore 'we intend to create a positive impact by publicly advocating for the protection of forests and other natural ecosystems'. It said 'the introduction of binding due diligence for companies in legislation is an important building block for the realization of human rights along international supply chains.'
<b>Aldi Sud</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	A spokesperson for Aldi Sud said 'We understand our responsibility to respect human rights throughout our value chain and we take any allegations of human rights abuse very seriously. We are now in contact with the relevant suppliers and will raise the Global Witness allegations with them and take the appropriate action to address any issues identified. The company said all its commitments and actions to protect human rights and exclude deforestation from its supply chains were available on its International ALDI SOUTH Group CR website.'
<b>Aldi UK</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	Aldi UK did not respond to our findings directly, but its German parent company, Aldi Sud indicated its response also applied to Aldi UK.
<b>Asda</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	An Asda spokesperson said 'Asda is a member of the Roundtable for Responsible Soya which is supported by UK Government and offers financial incentives for soya farmers to encourage sustainable production methods and high welfare standards. We are liaising with our suppliers to investigate these claims, and we are working hard to ensure that our target of 100% physically certified responsible soya by 2025 is reached and we are well on the way to meeting this target.'
<b>Auchan</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	Auchan did not respond to Global Witness's findings

Company	Community Conflict	Extracts from Company response to Global Witness findings
<b>Brookdale (Aldi Sud)</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	See response of Aldi Sud, above.
<b>Bunge</b>	Yeruti, Campo Agua'e	Bunge said it opened an investigation on receipt of Global Witness' findings, and if we wanted to follow its progress asked us to submit a formal grievance on its website. The company requested more information to aid it in its investigation. Bunge said it 'strongly refuted' the suggestion its lobbying activities sought to weaken the EU deforestation regulation.
<b>Cargill</b>	Ka'a Poty, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Loma Piro'y	Cargill said it takes allegations 'like this' very seriously, that it had opened an investigation, and any violations identified would result in termination of supplier relationships. It said it is 'committed to respecting land tenure rights of indigenous people and communities' and 'observe the principle of free, prior and informed consent'. It said it is 'continuously improving our due diligence across our supply chains and sourcing regions', prioritizes this in countries with 'particularly high, systemic risks of adverse human rights impacts', admitted South America was such a region, and has 'recently completed a human rights gap assessment and risk mapping'. On its lobbying around the EU Deforestation regulation, it said it 'supports the objective and ambition of the Commission's proposal', but expressed that 'one set of rules will not work for all commodities'.
<b>Carrefour</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	Carrefour condemned 'any violation to human rights and land rights of Indigenous', which are 'contrary to the values and policies of the Group'. It said it 'immediately initiated an internal investigation'. The company highlighted its commitment that '100% of Carrefour Quality Line and key Carrefour own brand products must use soybeans that are not derived from deforestation for animal feed". It said its investigation had found that 'Danish crown is a supplier of Carrefour for other products under other brands in our assortment', and that it had not yet confirmed that Paraguayan soy was used in these products. The company said it had therefore 'initiated a full mapping of products supplied from Danish Crown at Group level' and had held a meeting with Danish Crown to communicate that issues raised by our research were not in line with Carrefour values, and asked that Danish Crown immediately investigate the products sold to Carrefour. A subsequent meeting agreed Danish Crown should implement the actions it told Global Witness it would undertake (See above).
<b>Cefetra</b>	Yeruti, Campo Agua'e	Cefetra thanked Global Witness for the information provided, and said it was willing to learn and improve based on the information and was investigating the cases reported with its supply chain partners. It said it had been proactively working to make soy supply chains more sustainable since the late 1990's, and supported initiatives such as RTRS, and ProTerra, and had developed and implemented its own CRS-standard (since 2009). It said it believed the best course of action was to 'support soya production covered by a relevant scheme that encourages farmers to use best practices.
<b>Co-op</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo	Co-op said it was committed to '100% deforestation and conversion free and responsibly sourced soy in our supply chain

Company	Community Conflict	Extracts from Company response to Global Witness findings
	<p>Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y</p>	<p>by 2025' and was collaborating with its suppliers and cross-industry groups to achieve this. It said 'We recognise the seriousness of the issues raised in the research and acknowledge there are issues in soy production beyond deforestation, including those outlined in the report. Successfully addressing transparency and traceability will be vital for action on wider risks in soy production, and we work through the Retail Soy Group, Soy Transparency Coalition and UK Roundtable on Soy to address challenges collectively'. It has 'joined the UK Soy Manifesto, which will address deforestation and land conversion across all imports and will support development of further action to achieve the ambition for responsibly sourced soy.' It added 'We work to maximise our influence as a retailer, using credible certification where it supports change and engaging with other stakeholders in the supply chain. This includes direct conversations with soy traders to discuss concerns.'</p>
<p><b>Danish Agro</b></p>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l</p>	<p>Danish Agro said it is 'continuously working to promote more sustainable and resilient soy production' and doing so through the associations DAKOFO and FEFAC. It said 'As a member of DAKOFO, we are committed to ensuring that by 2025 100% of our imported soy is verified as being responsibly produced. We are following that plan, and by 2022 we will exceed 40% verified soy as planned.' It said, 'we strongly disapprove any human rights and land rights violations, which would be contrary to our requirements for our suppliers.' It said it had contacted its main supplier, ADM, and was awaiting the conclusions of the investigation ADM was undertaking'.</p>
<p><b>Danish Crown</b></p>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l</p>	<p>Danish Crown said it 'recognizes the challenges of establishing sustainable and transparent soy value chains. Therefore, Danish Crown has presented an ambitious soy strategy to ensure sustainable soy in 2025. Until sustainable physically segregated soy is available, Danish Crown will purchase RTRS credits, recognized by WWF. We do this to emphasize that we want sustainable and transparent soy production and to make it clear that sustainable value chains do not yet exist on a large scale.' It added that, as a result of Global Witness' findings, it would: 'enter a dialog with the Danish feed companies, to ensure transparency in the upstream supply chain'; 'ask Danish feed companies to be transparent ... so we can follow specific shipments of soy'; 'initiate a 3rd party review of the soy supply chain'; and 'review our current Soy Policy, and strengthen our focus upon deforestation, human rights, and land use, depending on the 3rd party review'. In a statement issued to its customers, also in response to our research, the company stated that 'By 2025 we want physically segregated soy for all slaughter animals from our cooperative owners'.</p>
<p><b>Decò (Italy)</b></p>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l</p>	<p>Decò did not respond to Global Witness's findings</p>
<p><b>DLG</b></p>	<p>Ka'a Poty, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Loma Piro'y</p>	<p>DLG said it 'repudiates any and all kinds of violations of human rights and land rights' and had asked ADM and Cargill to 'give an account of the allegations', and was awaiting the results of their investigations. It said is delivering on its action plan to ensure that 'by 2025 at the latest, DLG's soy imports must be verified as being responsibly produced'. It said, 'we have not</p>

Company	Community Conflict	Extracts from Company response to Global Witness findings
		<p>been sourcing any soy from Paraguay' and denied receiving Paraguayan soymeal shipments from ADM. Nonetheless, DLG admitted accepting 11,550 tonnes from Cargill in February 2022 'as a substitute for a delivery from another country.' DLG said Cargill's Paraguayan soy was not used in pig feed, so did not enter Danish Crown's supply chain.</p>
<b>Edeka</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l	<p>Edeka issued a statement that said: 'The EDEKA group, which also includes Netto Marken-Discount, is aware of its responsibility as a food retail company and as an active part of society at all levels. The protection of labour and human rights is our top priority – also in global supply chains. We are very interested in bringing such possible grievances to our attention. We therefore take the allegations you have made very seriously and investigate them in order to be able to clarify them accordingly.' It said it was 'already holding initial discussions with the relevant business partners', and that 'Compliance with human rights and applicable laws is absolutely necessary in order to be able to supply the EDEKA network'. It was 'not yet able to comment conclusively on the allegations ... until the conclusion of our internal investigations'. It pledged to inform Global Witness of the results of that investigation and any remedial action it would take.</p>
<b>ForFarmers</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y	<p>ForFarmers UK thanked Global Witness for the information provided, said it took the issues very seriously, and that it was 'in dialogue' with suppliers around the concerns raised. It said 'We have a robust approach to ensure our soya is responsibly sourced', and referred Global Witness to the sustainability section of its website.</p>
<b>Hormel Foods (SPAM)</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l	<p>Hormel Foods said it had 'set up a meeting to review this information with our internal experts.' The company subsequently said its review had involved internal and external experts and consulted with Danish Crown. It issued a statement provided by Danish Crown outlining its 'action plan' in response to our investigation (see response of Danish Crown, above), and that Hormel Foods would 'review its progress to ensure these action steps are completed.'</p>
<b>Iceland</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y	Iceland did not respond to Global Witness's findings
<b>Intermarché</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l	Intermarché did not respond to Global Witness's findings
<b>Kaufland</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l	<p>Kaufland said that 'Soy as feed is an important topic that we are addressing in order to promote GMO-free and, above all, deforestation-free supply chains', and it had initiated a 'soy mapping' exercise in 2021. For its own-brand products, the company said they 'prefer soy from Europe, for example the Donau Soja Standard and Europe Soya, but that were soy must be imported it prefers international certified GMO-Free soy, and that it relies on ProTerra or RTRS certifications. It said that while it sees credits as an interim solution 'the gradual conversion to physically traceable certified soy is running in parallel'. Kaufland listed four products from Danish Crown it</p>

Company	Community Conflict	Extracts from Company response to Global Witness findings
		<p>sells, and said it also had 'a variety of the industrial brand in our assortment'. It reported liaising with Danish Crown, which, it said, reported it was working to get transparency at one of its feed suppliers, DLG.</p>
<b>KFC</b>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y</p>	<p>A KFC Spokesperson said: "We have very clear requirements of our suppliers regarding ethical sourcing, and the wellbeing of our people - and all those across our supply chain - is always a top priority. We're a key signatory of the UK Soy Manifesto and are committed to ensuring that the soy in our supply chain is sourced responsibly, so we take these accusations very seriously. We appreciate Global Witness for bringing this to our attention and we will continue to stay close to the situation."</p>
<b>Lidl GB</b>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y</p>	<p>Lidl GB said it has a 'zero tolerance policy towards any human rights violations' in its supply chain and 'take responsibility to respect and protect the fundamental rights of all stakeholders'. Such approaches were incorporated into their legally binding Code of Conduct. It said it continuously reviews risk of human rights violations in its own-brand supply chains (through Human Rights Impact Assessments (HRIAs)), and takes remedial action where necessary, and as such was discussing Global Witness' allegations with its suppliers and had asked them to comment on our findings. They were reviewing the responses they had received and reserved the right to take further steps. The company pointed Global Witness to its Human Rights in the Supply Chain policy, and its 'purchasing policy for supply chains free of deforestation and conversion'.</p>
<b>Lidl Germany</b>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l</p>	<p>Lidl said it 'has a zero tolerance policy towards any human rights violations of any kind' and 'take responsibility, respect and protect the fundamental rights of all stakeholders in the different stages of our supply chains.' The company is 'committed to corporate due diligence and engagement for better working conditions and strengthening human rights within the framework of the United Nations Guiding Principles on Business and Human Rights'. This commitment is integrated in its Code of Conduct, which is 'a legally binding agreement' which 'obliges business partners to comply with social standards along the entire value chain, which are based on the core labour standards of the International Labour Organization (ILO) and the United Nations'. It said it 'continuously and systematically review potential risks such as human rights violations in the supply chains of our own-brand products and take remedial action where necessary'. It said it was 'in the process of discussing this with our supplier Danish Crown and have asked them to comment on the allegations. We now examine the allegations carefully and in detail and reserve the right to take further steps.'</p>
<b>Marks &amp; Spencer (M&amp;S)</b>	<p>Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y</p>	<p>M&amp;S said it had 'been exploring the possibility of providing a more coordinated response through industry channels', but then provided a response directly itself. M&amp;S said it was liaising with its supplier partners about the issues raised by Global Witness, and it understood they would be responding to Global Witness on the details of the investigation, which would be in line with processes laid out in M&amp;S' Global Sourcing Principles. It said those Principles placed an expectation on its suppliers to ensure their suppliers and sub-suppliers adhere to M&amp;S Principles where involved in producing or supplying M&amp;S</p>

Company	Community Conflict	Extracts from Company response to Global Witness findings
		products. These Principles require respecting land rights and 'remedy any issues that arise'. The company said this complements sourcing requirements outlined in the company's Animal Feed Sourcing Policy & Minimum Requirements Document.
<b>McDonalds</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y	McDonalds did not respond to Global Witness's findings
<b>METRO</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l	A spokeswoman for METRO said the company 'does not in any way accept violations of any human rights including described cases of e.g., land rights abuse and discrimination', and that this was reflected in the company's 'Human Rights Principles' policy. The company reported operationalising these principles for its own brand products through its Social Compliance Policy. It said, 'brand supply chains are bound to upholding against METROs values as stated in the Human Rights Principles via those Principles and its Code of Conduct', and that 'METRO acknowledges that standard schemes are only one yet important pillar of creating fair and socially compliant supply chains'.
<b>Monoprix</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Hugua Po'l	Monoprix said Danish Crown had not been a supplier to Monoprix 'for several months'. It said, as part of Casino Group, that it was implementing the "Manifiesto for a mobilization of French actors to fight against deforestation", which applies to French suppliers using Brazilian soybean meal in animal feed. It said it has 'submitted all of its French suppliers of raw and processed own-brand products whose animal feed contains soy to a contractual clause called "Soja ZDC". It added that all of its suppliers 'must sign the Ethical compliance Charter that commits them to respect the local and international laws applicable to the conduct of their business, the ILO principles, the Universal Declaration of Human Rights and the international agreements on fundamental human rights'.
<b>Morrisons</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y	Morrisons said neither 2 Sisters nor Danish Crown were 'partner suppliers', but they had contacted both firms, received statements from them, and were investigating further. Morrisons said the allegations were extremely concerning and appeared to violate their policy on free and prior informed consent of Indigenous peoples, shared with suppliers in 2020. The company said since Global Witness had sought information on its soy supply chain in July 2022, it had been reviewing its soy policy on FPIC, and had attended UK Soy Manifesto meetings with traders, and continued to work to send a clear market signal to traders to 'develop systems to provide verified deforestation and conversion free soy by 2025'.
<b>Nando's</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Hugua Po'l, Loma Piro'y	A Nando's spokesperson said "A sustainable and ethical supply chain is integral to our business. We work closely with our suppliers who, like us, take their responsibilities for soy sourcing seriously. We have robust protocols in place to make sure the production of soy remains in line with the required standards. We've also signed the UK Soy Manifesto and continue to work hard to implement this."

<b>Company</b>	<b>Community Conflict</b>	<b>Extracts from Company response to Global Witness findings</b>
<b>Netto</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	Netto did not respond to Global Witness' findings directly but confirmed its parent company Edeka's response applied to it as well.
<b>REWE</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	REWE did not respond to Global Witness's findings
<b>Sainsbury's</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	Sainsbury's said it took human rights and land rights violations linked to soy production very seriously and was investigating the issues Global Witness raised with both 2 Sisters and Danish Crown. It said the company has a longstanding commitment to address social and environmental issues in its supply chains, and detailed its memberships of the UK Soy Manifesto, the Retail Soy Group (RSG), UK Roundtable on sustainable soy, and Soy Transparency Coalition (STC). It said 3Keel collects information on soy used by Sainsbury's suppliers annually, and that currently 'we can only achieve visibility of country level for some volumes'. Sainsbury's said it want traceability to go further and is 'working with our direct and indirect suppliers ... to obtain further supply chain transparency, including to sub-national level.'
<b>Tesco</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	Tesco said it takes human rights allegations very seriously, had asked its suppliers to respond to them concerning our information, and was working to ensure they were aware of its policies on worker's rights, which it also outlined to Global Witness. Tesco acknowledged soy supply chains were 'complex' and said it was taking action to 'drive transparency in the soy industry so that we can see where our soy comes from and take action against actors committing environmental or human rights abuses'. It said it was 'investing considerable resources in trying to transition the soy sector to a sustainable and transparent footing', and highlighted its membership of the UK Soy Manifesto, and that it was 'cascading our commitments up the supply chain'. It said it has encouraged 2 Sisters and Danish Crown to join the UK Soy Manifesto and meet its commitments. The company said that, should signatories' approaches 'collectively succeed,' they would 'take a big step to being able to effectively monitor human rights in the supply chain'.
<b>The Family Butcher - (HerzensSACHE)</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Huguá Po'l	The Family Butchers did not respond to Global Witness's findings
<b>Waitrose</b>	Ka'a Poty, Comunidad Cerrito, Yeruti, Campo Agua'e, Sixth Line of Yvype Colony, Huguá Po'l, Loma Piro'y	Waitrose said it does not nor had purchased meat from 2 Sisters for its own-label products since May 2020. It said it sells three independent (third-party) branded Spam products using meat from Danish Crown, and that 'Independent brands are responsible for specifying the origin of the pork and of the soya used in feed to produce it'. Waitrose said that, as a consequence of our report it would contact ADM, Cargill, Bunge and Cefetra, and 'request an explanation for what actions they are taking to remedy impacts and to take preventative measures going forward.'

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## ENDNOTES

- <sup>1</sup> Interview with Global Witness, 29 March 2022
- <sup>2</sup> ABC, 'La Marcha al Este cambio para siempre la fisonomía del paraguay', 24 October 2008, available at <https://www.abc.com.py/edicion-impresa/politica/la-marcha-al-este-cambio-para-siempre-la-fisonomia-del-paraguay-1114363.html>, accessed 20 November 2022.
- <sup>3</sup> Gloria Scappini, anthropologist, communication with Global Witness, 19 July 2022.
- <sup>4</sup> Reed, Richard and Renshaw, John (2012). 'The Aché and Guaraní: Thirty Years after Maybury-Lewis and Howe's Report on Genocide in Paraguay,' *Tipiti: Journal of the Society for the Anthropology of Lowland South America*: Vol. 10: Iss. 1, Article 1, 1-18. Available at: <https://digitalcommons.trinity.edu/tipiti/vol10/iss1/1>, accessed 20 November 2022.
- <sup>5</sup> Constitución de la República de Paraguay, 1992, Article 64, available at [https://www.oas.org/juridico/spanish/mesicic2\\_pry\\_anex03.pdf](https://www.oas.org/juridico/spanish/mesicic2_pry_anex03.pdf), accessed 20 November 2022.
- <sup>6</sup> Diocesis of Ciudad del Este, 'Inminente desalojo de la comunidad indígena de Cerrito', 29 November 2021, available at <https://diocesisdcde.org.py/paginas/inminente-desalojo-de-la-comunidad-indigena-de-cerrito-previsto-para-esta-madrugada/>, accessed 20 November 2022.
- <sup>7</sup> Interview with Global Witness, 29 March 2022
- <sup>8</sup> Clarín, 'El Agro Paraguayo', 27 February 2015, available at [https://www.clarin.com/rural/soja-guarani-hace-lugar-alto\\_0\\_r1p7JED5vQg.html](https://www.clarin.com/rural/soja-guarani-hace-lugar-alto_0_r1p7JED5vQg.html), accessed 20 November 2022.
- Ultima Hora, 'Sojero que expulso a indígenas usa tierra pública, dice estudio', 1 November 2019, available at <https://www.ultimahora.com/sojero-que-expulso-indigenas-usa-tierra-publica-dice-estudio-n2852303.html>, accessed 20 November 2022.
- <sup>9</sup> Letter from seven Senators to to Señor Oscar Saloman, President of the Paraguayan Senate, 29 October 2020, available at <http://odd.senado.gov.py/archivos/file/PI%20a%20la%20Corte%20Suprema%20de%20Justicia.pdf>, accessed 20 November 2022.
- <sup>10</sup> 15 March 2021 letter from Justice Officer Mario C. Peralta, to Sr. Crio. Gral. Inspector Carlos Cacaes, Alto Parana Director of Police, soliciting police accompaniment in serving an eviction order. Letter available in a Facebook post from RTV, at <https://www.facebook.com/313267572022844/posts/4696169347065956/>, accessed 20 November 2022.
- <sup>11</sup> Testimony from community members to Global Witness, 29 March 2022: Arnalda Martínez; Alberto Britez; Dora Natalia FAPI (Federación por la Autodeterminación de los Pueblos Indígenas), 'La FAPI repudia el violento desalojo contra la comunidad indígena Cerrito', available at <https://fapi.org.py/la-fapi-repudia-el-violento-desalojo-contra-la-comunidad-indigena-cerrito-de-alto-parana/>, accessed 20 November 2022.
- Ultima Hora, 'Repudian violento desalojo contra una comunidad indígena en el Alto Parana', 16 May 2021, available at <https://www.ultimahora.com/repudian-violento-desalojo-contra-una-comunidad-indigena-el-alto-parana-n2941066.html>, accessed 20 November 2022.
- <sup>12</sup> Testimony from community members to Global Witness, 29 March 2022. Ultima Hora, 'Indígenas sufren violento desalojo por tercera vez', 20 May 2022, available at <https://www.ultimahora.com/indigenas-sufren-violento-desalojo-tercera-vez-minga-pora-n3002518.html>, accessed 20 November 2022.
- <sup>13</sup> Testimony from community members to Global Witness, 29 March 2022.
- Ultima Hora, 'Indígenas sufren violento desalojo por tercera vez', 20 May 2022, available at <https://www.ultimahora.com/indigenas-sufren-violento-desalojo-tercera-vez-minga-pora-n3002518.html>, accessed 20 November 2022.
- <sup>14</sup> Ultima Hora, 'Indi pedirá informe a Fiscalía y Policía tras desalojo de indígenas en Minga Porã', 20 May 2022, available at <https://www.ultimahora.com/indi-pedira-informe-fiscalia-y-policia-desalojo-indigenas-minga-pora-n3002598.html>, accessed 20 November 2022.
- INDI, 'INDI solicitará informe al Ministerio Público y la Policía Nacional sobre procedimiento en Mina Pora', 21 May 2022, available at <https://www.indi.gov.py/index.php/noticias/indi-solicitará-informe-al-ministerio-publico-y-la-policia-nacional-sobre-procedimiento-en-minga-pora>, accessed 20 November 2022.
- <sup>15</sup> Letter to Señor Oscar Saloman, President of the Paraguayan Senate, 29 October 2020, available at <http://odd.senado.gov.py/archivos/file/PI%20a%20la%20Corte%20Suprema%20de%20Justicia.pdf>, accessed 20 November 2022.
- <sup>16</sup> Ultima Hora, 'Desalojo por segunda vez en el año a comunidad indígena Cerrito', 30 November 2021, available at <https://www.ultimahora.com/desalojan-segunda-vez-el-ano-comunidad-indigena-cerrito-arroyo-guazu-n2974327.html>, accessed 20 November 2022.
- Diocesis de Ciudad del Este, 'Inminente desalojo de la comunidad indígena de Cerrito previsto para esta madrugada', 29 November 2021, available at <https://diocesisdcde.org.py/paginas/inminente-desalojo>

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de-la-comunidad-indigena-de-cerrito-previsto-para-esta-madrugada/, accessed 20 November 2022.

BASE-IS, 'Desalojos ilegales y criminalización contra campesinos en la era Sandra Quiñónez', 14 February 2022, available at <https://www.baseis.org.py/desalojos-ilegales-y-criminalizacion-contra-campesinos-en-la-era-sandra-quinonez/>, accessed 20 November 2022.

Rights groups argue that the use of the criminal justice system enables landowners to evade any examination of the fraught roots of land ownership in Paraguay. "Due to widespread corruption in land matters and the consequent lack of regular property titles, facing the occupation of large estates, landholders avoid proceeding in the civil jurisdiction and instead resort to the Public Ministry," the Social Platform for Human Rights, Memory and Democracy told Global Witness on 7 January 2022.

<sup>17</sup> UN Special Rapporteur on the right to adequate housing, 'Forced Evictions', available at <https://www.ohchr.org/en/special-procedures/sr-housing/forced-evictions#:~:text=Forced%20evictions%20constitute%20gross%20violations,treatment%2C%20and%20freedom%20of%20movement,> accessed 20 November 2022.

<sup>18</sup> Ministry of the Environment and Sustainable Development, resolution approving the environmental management plan for a silo owned by German Hutz, available at <http://www.mades.gov.py/wp-content/uploads/2019/06/GERMAN-HUTZ-EXP-SIAM-N%C2%B0-1815-2019.pdf>, accessed 20 November 2022.

<sup>19</sup> Global Witness field research, 28 March 2022.

<sup>20</sup> Tierra Viva, Ava Guarani, available at [https://www.tierraviva.org.py/pueblos\\_indigenas/ava-guarani/](https://www.tierraviva.org.py/pueblos_indigenas/ava-guarani/), accessed 20 November 2022.

<sup>21</sup> The two evictions, which occurred in June and November 2021, are covered in: Al Jazeera, 'Paraguay Indigenous Community evicted in land dispute', 30 July 2021, available at <https://www.aljazeera.com/news/2021/7/30/paraguay-Indigenous-community-evicted-in-land-dispute>, accessed 20 November 2022.

Ultima Hora, 'Abogada celebra resitucion de tierras indigenas y rechaza acusaciones', 18 August 2021, available at <https://www.ultimahora.com/abogada-celebra-restitucion-tierras-indigenas-y-rechaza-acusaciones-n2956786.html>, accessed 20 November 2022.

MadeinParaguay, 'Comunidad Ka'a Poty denuncia al Estado Paraguayo ante la ONU y la CSJ', 23 November 2021, available at <https://madeinparaguay.net/noticia/comunidad-kaa-poty-denuncia-al-estado-paraguayo-ante-la-onu-y-la-csj-273>, accessed 20 November 2022.

<sup>22</sup> Paraguay's National Cadastral Service indicates that Paraguay's Indigenous Institute is registered as the holder of Finca: 1628, a 1364 hectare property inscribed in September 2008 as Padron 1933 in Itakyry district in Alto

Parana Department. , Data available at <https://www.catastro.gov.py/servicio-linea/#!/consulta-publica/cuentas-rurales>. Last accessed 20 October 2022

<sup>23</sup> Ultima Hora, 'Instituciones certifican que tierras en Itakyry son del Indi', 29 June 2022, available at <https://www.ultimahora.com/instituciones-certifican-que-tierras-itakyry-son-del-indi-n3009505.html#:~:text=El%20senador%20Miguel%20Kench%20Rodr%C3%ADguez,Poty%20del%20pueblo%20Ava%20Guaran%C3%AD>, accessed 20 November 2022.

<sup>24</sup> Ultima Hora, 'Instituciones certifican que tierras en Itakyry son del Indi', 29 June 2022, available at <https://www.ultimahora.com/instituciones-certifican-que-tierras-itakyry-son-del-indi-n3009505.html>, accessed 20 November 2022.

<sup>25</sup> Ultima Hora, 'Nativos dejan Asunción y en Itakyry hay conflicto por reubicación', 25 June 2022, available at <https://www.ultimahora.com/nativos-dejan-asuncion-y-itakyry-hay-conflicto-reubicacion-n3008787.html>, accessed 20 November 2022.

<sup>26</sup> Ultima Hora, 'Nativos dejan Asunción y en Itakyry hay conflicto por reubicación', 25 June 2022, available at <https://www.ultimahora.com/nativos-dejan-asuncion-y-itakyry-hay-conflicto-reubicacion-n3008787.html>, accessed 20 November 2022.

Ultima Hora, 'Sojeros falsificaron títulos en complicidad con Indert y Poder Judicial, dice senador', 28 June 2022, available at <https://www.ultimahora.com/sojeros-falsificaron-titulos-complicidad-indert-y-poder-judicial-dice-senador-n3009331.html>, accessed 20 November 2022.

<sup>27</sup> Ultima Hora, 'Víctima relata momentos de terror durante ataque a su vivienda por indígenas', 21 August 2022, available at <https://www.ultimahora.com/victima-relata-momentos-terror-ataque-su-vivienda-indigenas-n3019017.html>, accessed 20 November 2022.

<sup>28</sup> ABC, 'Imputan por varios hechos presuntos participantes del ataque en Itakyry', 22 August 2022, available at <https://www.abc.com.py/este/2022/08/22/imputan-por-varios-hechos-a-participantes-del-ataque-en-itakyry/>, accessed 20 November 2022.

<sup>29</sup> Paraguay's National Cadastral Service indicates that Agro Integración is registered as the holder of Finca 2552, a 145 hectare property inscribed in May 2020 as Padron 2970 in Itakyry district of Alto Parana Department, and that Agrícola Entre Ríos S.A. is registered as the holder of Finca 62, a 4,086 hectare property inscribed in October 2017 as Padron 76 in Mariscal F. S. Lopez district of Caaguazu department. Data sourced from: <https://www.catastro.gov.py/servicio-linea/#!/consulta-publica/cuentas-rurales>. These two properties overlap coordinates for Finca 1628, a 1364 hectare property inscribed in September 2008 as Padron 1933 in Itakyry

district in Alto Parana Department, registered to Paraguay's Indigenous Institute.

<sup>30</sup> Global Witness field research, 28 March 2022.

<sup>31</sup> As of the time of writing, 20 October 2022, ADM's public Grievance Log had not been updated since 1 August 2022, and had no record of cases Global Witness had informed it of on 26 August 2022.

<sup>32</sup> ADM's Grievance Protocol 2021, available at <https://www.adm.com/globalassets/sustainability/goals-programs/responsible-sourcing/pdfs/grievances-and-resolutions-protocol-2021.pdf>, accessed 20 November 2022.

<sup>33</sup> Joel Correia, 'Soy states: resource politics, violent environments and soybean territorialization in Paraguay', *Journal of Peasant Studies*, 2 February 2019, available at [https://www.researchgate.net/publication/320896974\\_Soy\\_states\\_resource\\_politics\\_violent\\_environments\\_and\\_soybean\\_territorialization\\_in\\_Paraguay](https://www.researchgate.net/publication/320896974_Soy_states_resource_politics_violent_environments_and_soybean_territorialization_in_Paraguay), accessed 20 November 2022.

<sup>34</sup> CAPECO, 'Area de siembra, produccion y rendimiento', available at <http://capeco.org.py/area-de-siembra-produccion-y-rendimiento/>, accessed 20 November 2022.

<sup>35</sup> OEC, 'soybean exports 2020', available at [https://oec.world/en/profile/hs/soybeans#:~:text=Exports%20In%202020%20the%20top,and%20Argentina%20\(%241.76B\)](https://oec.world/en/profile/hs/soybeans#:~:text=Exports%20In%202020%20the%20top,and%20Argentina%20(%241.76B)), accessed 20 November 2022.

<sup>36</sup> Birdlife International, 'The rapid loss of Paraguay's Atlantic Forest', 2008, available at <http://datazone.birdlife.org/sowb/casestudy/the-rapid-loss-of-paraguays-atlantic-forest-and-the-status-of-protected-areas>, accessed 20 November 2022.

<sup>37</sup> Chenquan Huang et al, 'Remote Sensing of Environment 106, Rapid loss of Paraguay's Atlantic Forest – a landsat assessment', 16 September 2006, available at [https://www.researchgate.net/publication/222701618\\_Rapid\\_loss\\_of\\_Paraguay's\\_Atlantic\\_forest\\_and\\_the\\_status\\_of\\_protected\\_areas\\_-\\_A\\_Landsat\\_assessment/citation/download](https://www.researchgate.net/publication/222701618_Rapid_loss_of_Paraguay's_Atlantic_forest_and_the_status_of_protected_areas_-_A_Landsat_assessment/citation/download), accessed 20 November 2022.

<sup>38</sup> WWF, 'Paraguay renews commitment to zero deforestation', 5 February 2021, available at <https://updates.panda.org/paraguay-renews-commitment-to-zero-deforestation>, accessed 20 November 2022.

<sup>39</sup> Trase, 'Trends in commodity expansion and deforestation', undated, available at <https://insights.trase.earth/yearbook/highlights/expansion-and-deforestation/>, accessed 20 November 2022.

<sup>40</sup> Areco, A. y Irala, A. (2021). 'Desalojo forzoso como respuesta a quienes reivindican acceso a la tierra', En Codehupy (Ed.), *Derechos Humanos en Paraguay 2021* (299-314). Asunción, Paraguay: Codehupy.

<sup>41</sup> Bloomberg, 'Paraguay soybean giant girds for worst harvest in two decades', 18 January 2022,

<https://www.bloomberg.com/news/articles/2022-01-18/paraguay-soybean-giant-girds-for-worst-harvest-in-two-decades>, accessed 20 November 2022.

<sup>42</sup> Trase, 'New entrants challenge ABCD traders in Paraguayan soy export trade', 2 July 2020, available at <https://insights.trase.earth/insights/new-entrants/>, accessed 20 November 2022.

<sup>43</sup> UN COMTRADE statistics, accessed 20 September 2022. This excludes Brazil and Argentina, which are transshipment hubs rather than destinations for Paraguayan soy. See also industry figures for the UK, reported in the UK Roundtable on Sustainable Soya: 'Annual Progress Report 2021', available at <https://www.efeca.com/wp-content/uploads/2021/12/UK-RTSS-APR-2021.pdf>, accessed 20 November 2022.

<sup>44</sup> Testimony from Norma Portillo and Isabel Bordon to Global Witness, 8 March 2022.

UN Human Rights Office of the High Commissioner, 'Paraguay Responsible for human rights violations in context of massive fumigations', 14 August 2019, available at <https://www.ohchr.org/en/press-releases/2019/08/paraguay-responsible-human-rights-violations-context-massive-agrochemical?LangID=E&NewsID=24890>, accessed 20 November 2022.

UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2751/2016\*', 20 September 2019, available at <https://www.mre.gov.py/simoreplus/Adjuntos/Informes/Dictamen%20CCPR-C-126-D-2751-2016%20Norma%20Portillo.pdf>, accessed 20 November 2022.

<sup>45</sup> Ibid.

<sup>46</sup> BASE-IS, 'COLONIA YERUTÍ: EL JUEZ PEDRO MAYOR MARTÍNEZ SE NEGÓ A ADMINISTRAR JUSTICIA', 1 February 2011, available at <https://www.baseis.org.py/adjuntos/LAS%20COMUNIDAD%20CAMPESINAS%20Y%20EL%20DESAMPARO%20DE%20LA%20JUSTICIA.pdf>, accessed 20 November 2022.

<sup>47</sup> UN Human Rights Office of the High Commissioner, 'Paraguay Responsible for human rights violations in context of massive fumigations', 14 August 2019, available at <https://www.ohchr.org/en/press-releases/2019/08/paraguay-responsible-human-rights-violations-context-massive-agrochemical?LangID=E&NewsID=24890>, accessed 20 November 2022.

UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2751/2016\*', 20 September 2019, available at <https://www.mre.gov.py/simoreplus/Adjuntos/Informes/Dictamen%20CCPR-C-126-D-2751->

2016%20Norma%20Portillo.pdf, accessed 20 November 2022.

<sup>48</sup> El Surtidor, 'Quien le mató a mi papá?', 28 November 2019, available at <https://elsurti.com/futuros/reportaje/2020/08/13/quien-le-mato-a-mi-papa/>, accessed 20 November 2022.

<sup>49</sup> Ibid.

UN Human Rights Office of the High Commissioner, 'Paraguay Responsible for human rights violations in context of massive fumigations', 14 August 2019, available at <https://www.ohchr.org/en/press-releases/2019/08/paraguay-responsible-human-rights-violations-context-massive-agrochemical?LangID=E&NewsID=24890>, accessed 20 November 2022.

UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2751/2016\*', 20 September 2019, available at <https://www.mre.gov.py/simoreplus/Adjuntos/Informes/Dictamen%20CCPR-C-126-D-2751-2016%20Norma%20Portillo.pdf>, accessed 20 November 2022.

<sup>50</sup> UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2751/2016\*', 20 September 2019, available at <https://www.mre.gov.py/simoreplus/Adjuntos/Informes/Dictamen%20CCPR-C-126-D-2751-2016%20Norma%20Portillo.pdf>, accessed 20 November 2022.

<sup>51</sup> UN Human Rights Office of the High Commissioner, 'Paraguay Responsible for human rights violations in context of massive fumigations', 14 August 2019, available at <https://www.ohchr.org/en/press-releases/2019/08/paraguay-responsible-human-rights-violations-context-massive-agrochemical?LangID=E&NewsID=24890>, accessed 20 November 2022.

<sup>52</sup> UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2751/2016\*', 20 September 2019, available at <https://www.mre.gov.py/simoreplus/Adjuntos/Informes/Dictamen%20CCPR-C-126-D-2751-2016%20Norma%20Portillo.pdf>, accessed 20 November 2022.

<sup>53</sup> Ibid.

<sup>54</sup> Testimony from Norma Portillo to Global Witness, 8 March 2022.

<sup>55</sup> Testimony from Norma Portillo and Isabel Bordon to Global Witness, 8 March 2022. See also: El Surtidor, 'Quien le mató a mi papá?', 28 November 2019, available at <https://elsurti.com/futuros/reportaje/2020/08/13/quien-le-mato-a-mi-papa/>, accessed 20 November 2022.

<sup>56</sup> Ultima Hora, 'Niños quedan sin estudiar, tras cierre de escuela en Curuguaty', 5 May 2021, available at <https://www.ultimahora.com/ninos-quedan-estudiar-cierre-escuela-curuguaty-n2939264.html>, accessed 20 November 2022.

<sup>57</sup> Testimony from Isabel Bordon to Global Witness, 8 March 2022.

<sup>58</sup> Global Witness field investigation, 8 March 2021.

<sup>59</sup> Campo Agua'e is located 20km north of Yeruti.

UN News, 'Paraguay violated Indigenous rights, UN Committee rules in landmark decision', 13 October 2021, available at <https://news.un.org/en/story/2021/10/1102922>, accessed 20 November 2022.

UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2552/2015', 12 October 2021, available at [https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S\\_AFTER%20PLENARY.pdf](https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S_AFTER%20PLENARY.pdf), accessed 20 November 2022.

<sup>60</sup> Testimony to Global Witness by Lucia Sosa and Benito Oliviera, 7 March 2022.

CODEHUPY, 'Campo Agua': Comité de DDHH de la ONU condena a Paraguay', 13 October 2021, available at <https://www.codehupy.org.py/comite-de-derechos-humanos-de-la-onu-condena-a-paraguay-por-contaminacion-con-agrotoxicos-de-una-comunidad-indigena-en-canindeyu/>, accessed 20 November 2022.

<sup>61</sup> UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2552/2015', 12 October 2021, available at [https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S\\_AFTER%20PLENARY.pdf](https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S_AFTER%20PLENARY.pdf) (see paragraphs 2.8, 2.10, 3.10), accessed 20 November 2022.

Testimony to Global Witness from Lucia Sosa and Benito Oliviera, 7 March 2022:

Al Jazeera, 'How Indigenous communities in Paraguay are fighting big soy', 30 November 2021, available at <https://www.aljazeera.com/news/2021/11/30/how-paraguay-Indigenous-communities-are-fighting-big-soy>, accessed 20 November 2022.

<sup>62</sup> UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2552/2015', 12 October 2021, available at [https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S\\_AFTER%20PLENARY.pdf](https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S_AFTER%20PLENARY.pdf), accessed 20 November 2022.

<sup>63</sup> Ibid.

<sup>64</sup> Ibid, and: Ultima Hora, 'Ligitio estrategico contra el estado', 4 August 2014, available at <https://www.ultimahora.com/litigio-estrategico-contra-el-estado-n817848.html>, and: ABC, 'Plantan soja al lado de la escuela', 6 January 2021, available at <https://www.abc.com.py/edicion-impresia/economia/plantan-soja-al-lado-de-escuela-56844.html>, accessed 20 November 2022.

<sup>65</sup> Testimony to Global Witness from Rosana Oliviera, 7 March 2022

<sup>66</sup> UN News, 'Paraguay violated Indigenous rights, UN Committee rules in landmark decision', 13 October 2021, available at <https://news.un.org/en/story/2021/10/1102922>, accessed 20 November 2022.

UN Human Rights Committee, 'Dictamen aprobado por el Comité a tenor del artículo 5, párrafo 4, del Protocolo Facultativo, respecto de la comunicación núm. 2552/2015', 12 October 2021, available at [https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S\\_AFTER%20PLENARY.pdf](https://www.mre.gov.py/simoreplus/Adjuntos/Informes/CCPR-C-132-DR-2552-2015%20S_AFTER%20PLENARY.pdf), accessed 20 November 2022.

<sup>67</sup> UN News, 'Paraguay violated indigenous rights, UN committee rules in landmark decision', 13 October 2021, available at <https://news.un.org/en/story/2021/10/1102922>, accessed 20 November 2022.

<sup>68</sup> Testimony to Global Witness from Lucia Sosa, 7 March 2022

<sup>69</sup> Oxfam and Luis Rojas, Yvy Jara: Los Duenos de la Tierra en Paraguay, November 2016, available at [https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file\\_attachments/yvy\\_jara\\_informe\\_oxfamenparaguay.pdf](https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file_attachments/yvy_jara_informe_oxfamenparaguay.pdf), accessed 20 November 2022.

Global Witness field investigation, 7 March 2022.

<sup>70</sup> Global Witness field investigation, 7 March 2022.

<sup>71</sup> UN News, 'Paraguay violated indigenous rights, UN committee rules in landmark decision', 13 October 2021, available at <https://news.un.org/en/story/2021/10/1102922>, accessed 20 November 2022.

<sup>72</sup> Global Witness field investigation, 7 March 2022.

<sup>73</sup> The use of paraquat is prohibited in the EU and UK; in 2020, Paraguay imported 7,400 tonnes of the chemical. BASE-IS, 'Con la Soja Al Cuello 2021', p.31, November 2021, available at <https://www.biodiversidadla.org/Recomendamos/Con-la-soja-al-cuello-2021>, accessed 20 November 2022.

<sup>74</sup> 6.2%. BASE-IS, 'Con la soja al cuello 2018', November 2018, available at <https://www.biodiversidadla.org/Recomendamos/Con-la-Soja-al-Cuello-2018.-Informe-sobre-agronegocios-en-Paraguay> (PDF download) , accessed 20 November 2022.

<sup>75</sup> Ley 3742, Control de productos fitosanitarios de uso agrícola, article 71, 14 December 2019, available at <https://www.bacn.gov.py/leyes-paraguayas/2940/ley-n-3742-control-de-productos-fitosanitarios-de-uso-agricola>, accessed 20 November 2022.

<sup>76</sup> BASE-IS and Mirielle Palau et al, 'Escuelas Rurales Fumigadas en Paraguay', 2020, available at <https://escuelasfumigadas.org/wp-content/uploads/2021/02/Escuelas-rurales-fumigadas-en-Paraguay.pdf>, accessed 20 November 2022.

<sup>77</sup> UN Human Rights Office of the High Commissioner, 'Paraguay: aumento alarmante del uso de agrotoxicos compromete los derechos humanos, dice experto de la ONU', 14 October 2022, available at <https://www.ohchr.org/es/press-releases/2022/10/paraguay-alarming-increase-use-pesticides-compromises-human-rights-says-un>, accessed 20 November 2022.

<sup>78</sup> INECIP and Carlos Mora et al, 'Mapeamiento de centros educativos e identificación del peligro de contaminación ambiental por deriva de productos fitosanitarios', 2020, available at [http://www.inecip.org.py/adjuntos/publicaciones/2020\\_10\\_12\\_08\\_10\\_46\\_02informedeescuelas15.pdf](http://www.inecip.org.py/adjuntos/publicaciones/2020_10_12_08_10_46_02informedeescuelas15.pdf), accessed 20 November 2022.

<sup>79</sup> BASE-IS and Mirielle Palau et al, 'Escuelas Rurales Fumigadas en Paraguay', 2020, available at <https://escuelasfumigadas.org/wp-content/uploads/2021/02/Escuelas-rurales-fumigadas-en-Paraguay.pdf>, accessed 20 November 2022. See page 52

<sup>80</sup> Ibid.

<sup>81</sup> INECIP and Carlos Mora et al, 'Mapeamiento de centros educativos e identificación del peligro de contaminación ambiental por deriva de productos fitosanitarios', 2020, available at [http://www.inecip.org.py/adjuntos/publicaciones/2020\\_10\\_12\\_08\\_10\\_46\\_02informedeescuelas15.pdf](http://www.inecip.org.py/adjuntos/publicaciones/2020_10_12_08_10_46_02informedeescuelas15.pdf), accessed 20 November 2022.

<sup>82</sup> BASE-IS and Mirielle Palau et al, 'Escuelas Rurales Fumigadas en Paraguay', 2020, available at <https://escuelasfumigadas.org/wp-content/uploads/2021/02/Escuelas-rurales-fumigadas-en-Paraguay.pdf>

<sup>83</sup> Interview with Global Witness, 23 March 2022.

<sup>84</sup> Testimony from Aida Gonzalez to Global Witness, 9 March 2022.

BASE-IS and Abel Areco et al, 'Colonia Yvyype Sexta Linea Entre la agonía y la esperanza', 20 October 2018, available at [https://www.baseis.org.py/wp-content/uploads/2018/11/2018\\_InformeN20-Oct.pdf](https://www.baseis.org.py/wp-content/uploads/2018/11/2018_InformeN20-Oct.pdf), and Luis Rojas and CODEHUPY, '25 Años: La reforma agraria en el papel, el capital en expansión, el campesiano en lucha', December 2020, available at

[https://ddhh2020.codehupy.org/wp-content/uploads/2020/12/DESC-Reforma-agraria\\_\\_WEB.pdf](https://ddhh2020.codehupy.org/wp-content/uploads/2020/12/DESC-Reforma-agraria__WEB.pdf), accessed 20 November 2022.

<sup>85</sup> Testimony from Aida Gonzalez to Global Witness, 9 March 2022.

INDERT, 'Caso Yvype: INDERT corrigio graves irregularidades cometidas por anteriores administraciones', 11 March 2021, available at <https://www.indert.gov.py/indert/index.php/noticias/cas-o-yvype-indert-corrigio-graves-irregularidades-cometidas-por-antiores-administraciones>, accessed 20 November 2022.

<sup>86</sup> Oxfam and Luis Rojas, 'Yvy Jara: Los Duenos de la Tierra en Paraguay', November 2016, available at [https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file\\_attachments/yvy\\_jara\\_informe\\_oxfamenparaguay.pdf](https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file_attachments/yvy_jara_informe_oxfamenparaguay.pdf), accessed 20 November 2022.

FIAN Internacional, 'Paraguay: Detener la ola de desalojos forzosos y criminalisacion', 10 December 2021, <https://www.fian.org/es/press-release/articulo/paraguay-detener-la-ola-de-desalojos-forzosos-y-criminalizacion-2894>, accessed 20 November 2022.

<sup>87</sup> "The Sixth Line" refers to the layout of traditional *campesino* communities in Paraguay in parallel lines.

Testimony from Catalino Silva to Global Witness, 10 March 2022. See also: BASE-IS and Abel Areco et al, 'Colonia Yvype Sexta Linea Entre la agonía y la esperanza', 20 October 2018, available at [https://www.baseis.org.py/wp-content/uploads/2018/11/2018\\_InformeN20-Oct.pdf](https://www.baseis.org.py/wp-content/uploads/2018/11/2018_InformeN20-Oct.pdf), accessed 20 November 2022.

<sup>88</sup> INDERT, 'Caso Yvype: INDERT corrigio graves irregularidades cometidas por anteriores administraciones', 11 March 2021, available at <https://www.indert.gov.py/indert/index.php/noticias/cas-o-yvype-indert-corrigio-graves-irregularidades-cometidas-por-antiores-administraciones>, accessed 20 November 2022.

Quintín Riquelme, 'Los sin tierra en Paraguay. Conflictos Agrarios y movimiento campesino', September 2003, available at <http://biblioteca.clacso.edu.ar/clacso/becas/20110120072311/riquelme.pdf>, accessed 20 November 2022.

<sup>89</sup> Testimony from Aida Gonzalez to Global Witness, 09 March 2022. See also: BASE-IS and Abel Areco et al, 'Colonia Yvype Sexta Linea Entre la agonía y la esperanza', 20 October 2018, available at [https://www.baseis.org.py/wp-content/uploads/2018/11/2018\\_InformeN20-Oct.pdf](https://www.baseis.org.py/wp-content/uploads/2018/11/2018_InformeN20-Oct.pdf), accessed 20 November 2022.

<sup>90</sup> Oscar Ayala and CODEHUPY, 'FORMULARIO PARA SOLICITAR MEDIDAS CAUTELARES', 10 March 2021, available at [https://codehupy.org.py/wp-](https://codehupy.org.py/wp-content/uploads/2021/03/Medidas-Cautelares.pdf)

[content/uploads/2021/03/Medidas-Cautelares.pdf](https://codehupy.org.py/wp-content/uploads/2021/03/Medidas-Cautelares.pdf), accessed 20 November 2022.

<sup>91</sup> RTV, 'Recuperaron su libertad', 28 October 2020, available at [https://m.facebook.com/watch/?v=1533916660145326&paipv=0&eav=AfascXrXzlrMRghFHodX5M\\_AvSqf43MQ7-5UzFAsXtszn8niKaV33jIvNlQeEgiRCY&\\_rdr](https://m.facebook.com/watch/?v=1533916660145326&paipv=0&eav=AfascXrXzlrMRghFHodX5M_AvSqf43MQ7-5UzFAsXtszn8niKaV33jIvNlQeEgiRCY&_rdr), accessed 20 November 2022.

<sup>92</sup> Instituto Nacional de Desarrollo Rural y de la Tierra, <https://www.indert.gov.py/indert/index.php>, accessed 20 November 2022.

<sup>93</sup> Ultima Hora, 'Sintierres rechazan decision del Indert sobre tierras en San Pedro', 16 January 2020, available at <https://www.ultimahora.com/sintierres-rechazan-decision-del-indert-tierras-san-pedro-n2865184.html>, accessed 20 November 2022.

<sup>94</sup> La Nacion, 'Abdo Benitez destituye a Mario Vega del Indert ante denuncia por cobro de coimas', 19 October 2020, available at <https://www.lanacion.com.py/politica/2020/10/19/abdo-benitez-destituye-a-mario-vega-del-indert-ante-denuncia-por-cobro-de-coimas/>, accessed 20 November 2022.

<sup>95</sup> INDERT, 'Caso Yvype: INDERT corrigio graves irregularidades cometidas por anteriores administraciones', 11 March 2021, available at <https://www.indert.gov.py/indert/index.php/noticias/cas-o-yvype-indert-corrigio-graves-irregularidades-cometidas-por-antiores-administraciones>, accessed 20 November 2022.

<sup>96</sup> INDERT, 'Resolucion 933/2021: Por la cual se declara la inaplicabilidad de dictámenes DGTA No. 60/2108, 61/2018, y 62/2018', 19 April 2021, accessed 20 November 2022.

<sup>97</sup> Transparency International, 'Paraguay Country Data', available at <https://www.transparency.org/en/countries/paraguay>, accessed 21 September 2022. Paraguay is the fifth most corrupt country in Latin America, after Venezuela, Nicaragua and Honduras and Guatemala.

<sup>98</sup> Testimony from Francisca Portillo to Global Witness, 10 March 2022. See also: CODEHUPY, 'Codehupy solicitó medidas cautelares ante la CIDH por desalojo forzoso a la Colonia Yvype Sexta Linea', 22 March 2021, available at <https://www.codehupy.org.py/codehupy-solicito-medidas-cautelares-ante-la-cidh-por-desalojo-forzoso-a-la-colonia-yvype-sexta-linea/>, accessed 20 November 2022.

<sup>99</sup> ABC, 'Codehupy denunció el desalojo de seis familias campesinas en la Colonia Yvype de Lima', 30 July 2021, available at <https://www.abc.com.py/nacionales/2021/07/30/codehupy-denuncio-el-desalojo-de-seis-familias-campesinas-en-la-colonia-yvype-de-lima/>, accessed 20 November 2022.

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Ultima Hora, 'Desalojan a seis familias de Colonia Yvype con gran contingente de policías', 30 July 2021, available at <https://www.ultimahora.com/desalojan-6-familias-colonia-yvype-gran-contingente-policias-n2953630.html>, accessed 20 November 2022.

Testimony from Gerardo Lezcano to Global Witness, 11 March 2022.

<sup>100</sup> Testimony from Gerardo Lezcano to Global Witness, 11 March 2022.

<sup>101</sup> ABC, 'Ley Zavala: invasión de tierras pasó a ser un "crimen"', 29 December 2021, available at <https://www.abc.com.py/especiales/anuario-abc-2021/2021/12/29/ley-zavala-invasion-de-tierras-paso-a-ser-un-crimen/>, accessed 20 November 2022.

<sup>102</sup> Cuaderno de Investigacion Fiscal, Fiscalia Zonal de Santa Rosa del Aguaray, 'Caratula de la Causa: Ministerio Publico c/Alejandro Colman Romero y Otros s/Invasion de inmueble ajeno.'

<sup>103</sup> Testimony from Aida Gonzalez to Global Witness, 10 March 2022.

<sup>104</sup> NetJudiciales, 'Presentan denuncia contra la president del Indert', 3 November 2021, available at <https://www.judiciales.net/presentan-denuncia-contra-la-presidenta-del-indert/>, accessed 20 November 2022.

<sup>105</sup> INDERT, 'Caso Yvype: INDERT corrigio graves irregularidades cometidas por anteriores administraciones', 11 March 2021, available at <https://www.indert.gov.py/indert/index.php/noticias/cas-o-yvype-indert-corrigio-graves-irregularidades-cometidas-por-antiores-administraciones>, accessed 20 November 2022.

<sup>106</sup> Ibid.

<sup>107</sup> Global Witness Interview with Abel Areco, CODEHUPY, 31 March 2022

<sup>108</sup> Soc. Coop. Agr. Friesland Ltda, Friesland Informationsblatt, August 2014, available at <https://friesland.com.py/infos/august2014.pdf>. See page 4. Confirmed by Cooperative Friesland, accessed 20 November 2022.

<sup>109</sup> Global Witness field investigation, 10, 11 March 2022.

<sup>110</sup> BASE-IS and Lis García et al, 'Radiografia del Agronegocio Sojero', December 2020, available at [https://www.baseis.org.py/wp-content/uploads/2021/03/2020\\_Dic-Cadena-de-la-soja\\_compressed.pdf](https://www.baseis.org.py/wp-content/uploads/2021/03/2020_Dic-Cadena-de-la-soja_compressed.pdf), accessed 20 November 2022. See page 178.

<sup>111</sup> Global Witness field investigation, 10, 11 March 2022.

<sup>112</sup> Global Witness field investigation, 10, 11 March 2022.

<sup>113</sup> Oxfam, 'Land and Human Rights in Paraguay', October 2014, available at [https://s3.amazonaws.com/oxfam-us/www/static/media/files/Paraguay\\_background.pdf](https://s3.amazonaws.com/oxfam-us/www/static/media/files/Paraguay_background.pdf), accessed 20 November 2022.

Oxfam and Luis Rojas, 'Yvy Jara: Los Duenos de la Tierra en Paraguay', November 2016, available at [https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file\\_attachments/yvy\\_jara\\_informe\\_oxfamenparaguay.pdf](https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file_attachments/yvy_jara_informe_oxfamenparaguay.pdf), accessed 20 November 2022.

<sup>114</sup> Brazil, Colombia and Peru come closest, with a score of 0.86. Oxfam and Luis Rojas, 'Yvy Jara: Los Duenos de la Tierra en Paraguay', November 2016, available at [https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file\\_attachments/yvy\\_jara\\_informe\\_oxfamenparaguay.pdf](https://d1tn3vj7xz9fdh.cloudfront.net/s3fs-public/file_attachments/yvy_jara_informe_oxfamenparaguay.pdf), accessed 20 November 2022.

<sup>115</sup> UN Human Rights Office of the High Commissioner, 'Paraguay produces food for 60 million people, yet parts of its own population face hunger and malnutrition', 10 November 2016, available at <https://www.ohchr.org/en/press-releases/2016/11/paraguay-produces-food-60-million-people-yet-parts-its-own-population-face>, accessed 20 November 2022.

<sup>116</sup> Trase, 'Soy expansion and deforestation in Paraguay: an uncertain picture', available at <https://insights.trase.earth/yearbook/contexts/paraguay-soy/>, accessed 20 November 2022.

Trase, 'New entrants challenge ABCD traders in Paraguayan soy export trade', 2 July 2020, available at <https://insights.trase.earth/insights/new-entrants/>, accessed 20 November 2022.

<sup>117</sup> Global Witness interview with Marcial Gomez, former Secretary General of the FNC, 24 March 2022.

<sup>118</sup> BASE-IS, 'Campesino asesinado en Santa Lucia', 19 September 2022, available at <https://www.baseis.org.py/campesino-asesinado-stalucia/>, accessed 20 November 2022.

BASE-IS, 'Comunidades Campesinas e indígenas violentadas y desalojadas', from 'Con la soja al cuello 2021', available at [https://www.baseis.org.py/wp-content/uploads/2022/06/2021\\_Nov-Co-la-Soja-al-cuello.pdf](https://www.baseis.org.py/wp-content/uploads/2022/06/2021_Nov-Co-la-Soja-al-cuello.pdf), accessed 20 November 2022.

Oxfam and Arantxa Guereña, 'The Soy Mirage', August 2013, available at <https://oxfamilibrary.openrepository.com/bitstream/handle/10546/299687/rr-soy-mirage-corporate-social-responsibility-paraguay-290813-en.pdf?sequence=1&isAllowed=y>, accessed 20 November 2022.

<sup>119</sup> UN Human Rights Office of the High Commissioner, 'Paraguay produces food for 60 million people, yet parts of its own population face hunger and malnutrition', 10 November 2016, available at <https://www.ohchr.org/en/press-releases/2016/11/paraguay-produces-food-60-million-people-yet-parts-its-own-population-face>, accessed 20 November 2022.

<sup>120</sup> ABC, 'Ley Zavala: invasión de tierras pasó a ser un "crimen"', 29 December 2021, available at <https://www.abc.com.py/especiales/anuario-abc-2021/2021/12/29/ley-zavala-invasion-de-tierras-paso-a-ser-un-crimen/>, accessed 20 November 2022.

<sup>121</sup> CODEHUPY, 'Informe Annual 2020', pages 295-313, available at <https://www.codehupy.org.py/wp-content/uploads/2020/12/Informe-Anual-Sobre-la-Situacion-de-los-DDHH-en-Paraguay-2020.pdf>, accessed 20 November 2022.

<sup>122</sup> Ibid.

<sup>123</sup> Based on OEC figures for 2020. Combined, exports of soybeans, soymeal, soy oil, corn, and wheat were worth \$3.641 billion. Paraguay's GDP in 2020 was \$35.43 billion, following World Bank data. See: OEC, 'Paraguay country profile', available at <https://oec.world/en/profile/country/py>, accessed 20 November 2022.

The World Bank, GDP data – 'Paraguay', available at <https://data.worldbank.org/indicator/NY.GDP.MKTP.CD?locations=PY>, accessed 20 November 2022.

<sup>124</sup> BASE-IS, 'Impuestos: El Minotauro del Agronegocio', from 'Con la soja al cuello 2021', pages 58-64, available at <https://www.baseis.org.py/wp-content/uploads/2021/11/Sojaalcuello2021-WEB.pdf>, accessed 20 November 2022.

<sup>125</sup> Direccion Nacional de Aduanas, 'Ranking de Importadores y Exportadores 2020', available at <https://www.cip.org.py/rankings/>, accessed 20 November 2022.

<sup>126</sup> Paraguayan government figures, supplied to Global Witness via a Freedom of Information request.

<sup>127</sup> Direccion Nacional de Aduanas, 'Ranking de Importadores y Exportadores 2020', available at <https://www.cip.org.py/rankings/>, accessed 20 November 2022.

<sup>128</sup> Paraguayan government figures, supplied to Global Witness via a Freedom of Information request.

<sup>129</sup> Reuters, 'Argentina hikes export tax on soy oil, meal to 33%', 19 March 2022, available at <https://www.reuters.com/article/grains-argentina-idUKL2N2VM096>, accessed 20 November 2022.

<sup>130</sup> UN Human Rights Council, 'Report of the Special Rapporteur on the right to food on her mission to Paraguay', 27 January 2017, available at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/019/79/PDF/G1701979.pdf?OpenElement>, accessed 20 November 2022.

<sup>131</sup> ABC, 'Senado rechaza la creacion del impuesto a la soja', 5 May 2020, available at <https://www.abc.com.py/nacionales/2020/05/05/senado-rechazo-la-creacion-del-impuesto-a-la-soja/>, accessed 20 November 2022.

<sup>132</sup> Reuters, 'Paraguay approves 10 pct soy export tax', 10 October 2013, available at <https://www.reuters.com/article/paraguay-soy-idUSL1N0I002T20131010>, accessed 20 November 2022.

<sup>133</sup> UN FAO, 'Ganaderos de Paraguay defienden el veto del ejecutivo al impuesto a la exportación de granos', 6 December 2013, available at <https://www.fao.org/in-action/agronoticias/detail/en/c/496751/>, accessed 20 November 2022.

<sup>134</sup> Testimony from Huguá Po'i residents, Manuel Ramos, Dilma Zorrilla, Rosalva, to Global Witness, 29 February 2022.

Ultima Hora, 'Vinieron y destruyeron lo poco que teníamos, quedamos en la calle', 30 November 2021, available at <https://www.ultimahora.com/vinieron-y-destruyeron-lo-poco-que-teniamos-quedamos-la-calle-n2974266.html>, accessed 20 November 2022.

The Guardian, 'Indigenous Community evicted as land clashes with agribusiness rock Paraguay', 21 November 2021, available at <https://www.theguardian.com/global-development/2021/nov/21/paraguay-evictions-land-Indigenous-agribusiness>, accessed 20 November 2022.

Iniciativa Amotodocie, 'Huguá Po'i muestra la violencia del estado paraguayo contra los pueblos indígenas', 23 November 2021, available at <https://www.iniciativa-amotocodie.org/2021/11/23/hugua-poi-muestra-la-violencia-del-estado-paraguayo-hacia-los-pueblos-indigenas/>, accessed 20 November 2022.

Ultima Hora, 'Vinieron y destruyeron lo poco que teníamos, quedamos en la calle', 30 November 2021, available at <https://www.ultimahora.com/vinieron-y-destruyeron-lo-poco-que-teniamos-quedamos-la-calle-n2974266.html>, accessed 20 November 2022.

<sup>135</sup> Testimony from Huguá Po'i residents, Manuel Ramos, Dilma Zorrilla, Rosalva, to Global Witness, 29 February 2022. See also, Iniciativa Amotodocie, 'Huguá Po'i muestra la violencia del estado paraguayo contra los pueblos indígenas', 23 November 2021, available at <https://www.iniciativa-amotocodie.org/2021/11/23/hugua-poi-muestra-la-violencia-del-estado-paraguayo-hacia-los-pueblos-indigenas/>, accessed 20 November 2022.

<sup>136</sup> Ultima Hora, 'Vinieron y destruyeron lo poco que teníamos, quedamos en la calle', 30 November 2021, available at <https://www.ultimahora.com/vinieron-y-destruyeron-lo-poco-que-teniamos-quedamos-la-calle-n2974266.html>, accessed 20 November 2022.

Biodiversidad, 'Comunicado conjunto sobre la situacion en Huguá Po'i', 29 July 2022, available at <https://www.biodiversidadla.org/Noticias/Comunicado-conjunto-sobre-la-situacion-en-Huguá-Po-i-Paraguay>, accessed 20 November 2022.

<sup>137</sup> Ultima Hora, 'Informe dice que empresa compró tierras con los indígenas adentro', 22 November 2021, available

at <https://www.ultimahora.com/informe-dice-que-empresa-compro-tierras-los-indigenas-adentro-n2972941.html>, accessed 20 November 2022.

Civil Society Report on Implementation of International Covenant on Civil and Political Rights, Marilin Rehnfeldt, 'Caso de la Comunidad Nembiará del Pueblo Mbya Guaraní', pages 148-9, available at <https://www2.ohchr.org/english/bodies/cescr/m/docs/info-ngos/pidescipy1.pdf>, accessed 20 November 2022.

<sup>138</sup> Rights groups including CODEHUPY argue that the judge did not have competency to issue the order, among numerous other irregularities they highlight in the procedure. See CODEHUPY, 'INDI solicitó resguardo policial para cumplir medida cautelar que favorece a comunidad indígena Huguá Po'í', 15 July 2022, available at <https://www.codehupy.org.py/indi-solicitado-resguardo-policial-para-cumplir-amparo-que-favorece-a-comunidad-indigena-hugua-poi/>, accessed 20 November 2022.

Ultima Hora, 'Gran despliegue policial para nuevo desalojo a indígenas en Caaguazú', 12 July 2022, available at <https://www.ultimahora.com/gran-despliegue-policial-nuevo-desalojo-indigenas-caaguazu-n3011854.html>, accessed 20 November 2022.

<sup>139</sup> CODEHUPY, 'Bebé indígena fallece en contexto de desprotección generado por desalojos forzosos', 26 July 2022, available at <https://www.codehupy.org.py/bebe-indigena-fallece-en-contexto-de-desproteccion-generado-por-desalojos-forzosos/>, accessed 20 November 2022.

<sup>140</sup> Global Witness field investigation, 29 February 2022.

<sup>141</sup> Communication with Mario Vega, lawyer representing Tres Palmas, 8 September 2022.

<sup>142</sup> Tierra Viva, 'Mbya Guaraní', available at [https://www.tierraviva.org.py/pueblos\\_indigenas/mbya-guarani/](https://www.tierraviva.org.py/pueblos_indigenas/mbya-guarani/), accessed 20 November 2022.

Gloria Scappini, anthropologist, communication with Global Witness, 19 July 2022.

<sup>143</sup> Testimony from Mario Rivarola, 29 February 2022

<sup>144</sup> Testimony from Mario Rivarola, 29 February 2022, and Gloria Scappini, anthropologist, communication with Global Witness, 19 July 2022.

Tierra Viva, 'Mbya Guaraní', available at [https://www.tierraviva.org.py/pueblos\\_indigenas/mbya-guarani/](https://www.tierraviva.org.py/pueblos_indigenas/mbya-guarani/), accessed 20 November 2022.

<sup>145</sup> Testimony from Dominga Coronel to Global Witness, 28 February 2022.

El País, 'Tierras "mal habidas": el origen de las expulsiones campesinas en Paraguay', 8 July 2021, available at <https://elpais.com/planeta-futuro/2021-07-08/tierras-mal-habidas-el-origen-de-las-expulsiones-campesinas-en-paraguay.html>, accessed 20 November 2022.

El Nacional, 'Sigue la tensión en comunidad indígena de Loma Piro'y por hostigamiento de bandas armadas', 23 December 2020, available at <https://www.elnacional.com.py/destacado/2020/12/23/sigue-la-tension-en-comunidad-indigena-de-loma-piroy-por-hostigamiento-de-bandas-armadas/>, accessed 20 November 2022.

<sup>146</sup> Joaju, 'Comunidad indígena Loma Piro'y, el símbolo del Paraguay violentado', available at <https://joaju.com.py/2020/12/24/comunidad-indigena-loma-piroy-el-simbolo-del-paraguay-violentado/>, accessed 20 November 2022.

<sup>147</sup> Testimony from Dominga Coronel to Global Witness, 28 February 2022.

El País, 'Tierras "mal habidas": el origen de las expulsiones campesinas en Paraguay', 8 July 2021, available at <https://elpais.com/planeta-futuro/2021-07-08/tierras-mal-habidas-el-origen-de-las-expulsiones-campesinas-en-paraguay.html>, accessed 20 November 2022.

El Nacional, 'Sigue la tensión en comunidad indígena de Loma Piro'y por hostigamiento de bandas armadas', 23 December 2020, available at <https://www.elnacional.com.py/destacado/2020/12/23/sigue-la-tension-en-comunidad-indigena-de-loma-piroy-por-hostigamiento-de-bandas-armadas/>, accessed 20 November 2022.

<sup>148</sup> Testimony from Dominga Coronel to Global Witness, 28 February 2022.

CODEHUPY, 'Atropello armado deja en evidencia la severidad de la crisis actual en el Paraguay', 18 March 2021, available at <https://www.codehupy.org.py/atropello-armado-deja-en-evidencia-la-severidad-de-la-crisis-actual-en-el-paraguay/>, accessed 20 November 2022.

<sup>149</sup> Testimony from Dominga Coronel to Global Witness, 28 February 2022.

<sup>150</sup> Ultima Hora, 'Imputan a presuntos autores de violento desalojo de indígenas', 19 April 2021, available at <https://www.ultimahora.com/caaguazu-imputan-presuntos-autores-violento-desalojo-indigenas-n2936830.html>, accessed 20 November 2022.

Nanduti, 'Imputan a tres personas tras supuesto desalojo violento en Caaguazú', 19 April 2021, available at [https://nanduti.com.py/imputan-a-tres-personas-tras-supuesto-desalojo-violento-en-caaguazu/page/14/?et\\_blog](https://nanduti.com.py/imputan-a-tres-personas-tras-supuesto-desalojo-violento-en-caaguazu/page/14/?et_blog), accessed 20 November 2022.

<sup>151</sup> Regina-Leader Post, 'Telling the story of Mennonites in Russia', 26 November 2019, available at <https://leaderpost.com/news/local-news/telling-the-story-of-mennonites-in-russia>, accessed 20 November 2022.

Global Anabaptist Mennonite Encyclopedia, 'Tres Palmas Colony (Paraguay)', accessed 28 September 2022,

available at [https://gameo.org/index.php?title=Tres\\_Palmas\\_Colony\\_\(Paraguay\)](https://gameo.org/index.php?title=Tres_Palmas_Colony_(Paraguay)), accessed 20 November 2022.

WochenBlatt, 'Von Mennoniten geführtes Unternehmen in Caaguazú überfallen', 26 Juni 2018, available at <https://wochenblatt.cc/von-mennoniten-gefuehrtes-unternehmen-in-caaguazu-ueberfallen/>, accessed 20 November 2022.

Civil Society Report on Implementation of International Covenant on Civil and Political Rights, Marilyn Rehnfeldt, 'Caso de la Comunidad Nembiará del Pueblo Mbya Guaraní', pages 148-9, available at <https://www2.ohchr.org/english/bodies/cescrm/docs/info-ngos/pidescpsy1.pdf>, accessed 20 November 2022.

<sup>152</sup> Ultima Hora, 'Antropóloga señala que soja invade las tierras de indígenas', 28 December 2020, available at <https://www.ultimahora.com/antropologa-senala-que-soja-invade-las-tierras-indigenas-n2920421.html>, accessed 20 November 2022.

<sup>153</sup> Joaju, 'Comunidad indígena Loma Piro'y, el símbolo del Paraguay violentado', available at <https://joaju.com.py/2020/12/24/comunidad-indigena-loma-piroy-el-simbolo-del-paraguay-violentado/>, accessed 20 November 2022.

<sup>154</sup> Global Witness field investigation, 28 February and 1 March 2022.

<sup>155</sup> See for example: Constitución de la Republica de Paraguay, 1992, Articles 62, 63 64, available at [https://www.oas.org/juridico/spanish/mesicic2\\_pry\\_anexo3.pdf](https://www.oas.org/juridico/spanish/mesicic2_pry_anexo3.pdf), accessed 20 November 2022.

See also the Indigenous Communities Law, 904/81, which mandates that the settlement of Indigenous communities accounts for "the current or traditional possession of the lands." The statute asserts that "The free and express consent of the Indigenous community will be essential for its settlement in places other than their usual territories", Available at <https://www.tierraviva.org.py/wp-content/uploads/2013/11/PDF.pdf>, accessed 20 November 2022.

<sup>156</sup> See Article 14 of Convention 169 of the International Labour Organisation, available at [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:55:0::NO::P55\\_TYPE,P55\\_LANG,P55\\_DOCUMENT,P55\\_NODE:REV,en,C169,/Document#A14](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:55:0::NO::P55_TYPE,P55_LANG,P55_DOCUMENT,P55_NODE:REV,en,C169,/Document#A14), accessed 20 November 2022.

See also Articles 26, 27 and 28 of the United Nations Declaration on the Rights of Indigenous People, available at [https://www.un.org/development/desa/Indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP\\_E\\_web.pdf](https://www.un.org/development/desa/Indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf), accessed 20 November 2022.

<sup>157</sup> Paraguay Supreme Court, 'SENTENCIAS EMITIDAS POR LA CORTE INTERAMERICANA DE DERECHOS HUMANOS RESPECTO AL PARAGUAY', available at

[https://www.pj.gov.py/descargas/ID1-304\\_sentencias\\_emitidas\\_por\\_la\\_corte\\_idh\\_respecto\\_al\\_paraguay.pdf](https://www.pj.gov.py/descargas/ID1-304_sentencias_emitidas_por_la_corte_idh_respecto_al_paraguay.pdf), accessed 20 November 2022. See cases 3, 4 and 7.

<sup>158</sup> Interamerican Court of Human Rights, 'CASO COMUNIDAD INDÍGENA XÁKMOK KÁSEK VS. PARAGUAY', 24 August 2010. See point 284. Available at [https://www.corteidh.or.cr/docs/casos/articulos/seriec\\_214\\_esp.pdf](https://www.corteidh.or.cr/docs/casos/articulos/seriec_214_esp.pdf), accessed 20 November 2022.

<sup>159</sup> Global Witness interview with Juan Rivarola, 3 March 2022.

<sup>160</sup> Global Witness interview with Eresmilda Roman Paiva, 28 March 2022.

<sup>161</sup> Constitución de la Republica de Paraguay, 1992, Article 64, available at [https://www.oas.org/juridico/spanish/mesicic2\\_pry\\_anexo3.pdf](https://www.oas.org/juridico/spanish/mesicic2_pry_anexo3.pdf), accessed 20 November 2022.

<sup>162</sup> Global Witness interview with Eresmilda Roman Paiva, 28 March 2022.

<sup>163</sup> Letter seen by Global Witness, signed by Nelson Alcides Mora.

<sup>164</sup> Global Witness interview with Eresmilda Roman Paiva, 28 March 2022. See also: ABC, 'Urgen enjuiciamiento de jueza Eresmilda Román', 21 January 2021, available at <https://www.abc.com.py/nacionales/2021/01/21/urg-enjuiciamiento-de-jueza-eresmilda-roman/>, accessed 20 November 2022.

ABC, 'Denuncia de persecucion contra jueza: Codehupy alerta a la ONU y al JEM', 16 December 2021, available at <https://www.abc.com.py/nacionales/2021/12/16/denunci-a-de-persecucion-contra-jueza-codehupy-alerta-a-la-onu-y-al-jem/>, accessed 20 November 2022.

<sup>165</sup> ABC, 'Complaint of perscution against judge: Codehupy alerts the UN and JEM', 16 December 2021, available at <https://www.abc.com.py/nacionales/2021/12/16/denunci-a-de-persecucion-contra-jueza-codehupy-alerta-a-la-onu-y-al-jem/>, accessed 20 November 2022.

<sup>166</sup> Jurado de Enjuiciamiento de Magistrados, 'Decisiones adoptadas en sesion ordinario de fecha del 11 de Octubre de 2022', 11 October 2022, available at <https://www.jem.gov.py/decisiones-adoptadas-en-sesion-ordinaria-de-fecha-11-de-ocubre-de-2022/>, accessed 20 November 2022.

<sup>167</sup> Global Witness interview with Eresmilda Roman Paiva, 28 March 2022.

<sup>168</sup> This covers the EU+28, incorporating the UK, as detailed in: IDH (2021) 'European Soy Monitor; Insights on the uptake of responsible and deforestation-free soy in 2019'. June 2021. Prepared for IDH by Schuttelaar & Partners. IDH: Utrecht, the Netherlands. Available at <https://www.idhsustainabletrade.com/uploaded/2021/06>

/2019-IDH-European-Soy-Monitor-report.pdf, accessed 20 November 2022.

<sup>169</sup> This also covers the EU+28, incorporating the UK, as detailed in: Greenpeace European Unit, 'For Local and ecological agriculture', 30 September 2020, available at <https://www.greenpeace.org/eu-unit/issues/nature-food/46173/for-local-and-ecological-agriculture/>, accessed 20 November 2022.

<sup>170</sup> Trase data shows the EU as the biggest destination of Paraguayan soy exports from 2014 till 2017. See: Trase, [https://supplychains.trase.earth/flows/data-view?selectedYears%5B%5D=2017&selectedYears%5B%5D=2017&toolLayout=1&countries=176&commodities=1&selectedColumnsIds=0\\_25-1\\_31-2\\_27-3\\_11](https://supplychains.trase.earth/flows/data-view?selectedYears%5B%5D=2017&selectedYears%5B%5D=2017&toolLayout=1&countries=176&commodities=1&selectedColumnsIds=0_25-1_31-2_27-3_11), accessed 20 November 2022.

<sup>171</sup> IDH (2021), 'European Soy Monitor; Insights on the uptake of responsible and deforestation-free soy in 2019' 2021, available at <https://www.idhsustainabletrade.com/uploaded/2021/06/2019-IDH-European-Soy-Monitor-report.pdf>, accessed 20 November 2022.

<sup>172</sup> Paraguay Central Bank data, 2020 and 2021.

<sup>173</sup> UN COMTRADE, period: 2021; reporter: all; partners: Paraguay; Trade flow: Import; HS: 2304.

<sup>174</sup> Paraguay's Central Bank reports 3,317,346 metric tonnes of whole soybean exports to Argentina for April 2019 to March 2020. (Data available at: <https://www.bcp.gov.py/serie-detallada-de-comercio-exterior-i381>.) This contributed 8.7% of Argentina's 2019/2020 soybean meal crush of 37.8 million metric tonnes of soybean meal crush, as reported in: United States Department of Agriculture, Foreign Agricultural Service (USDA-FAS) and the Global Agricultural Information Network (GAIM), 'Oilseeds and Products Update (AR2022-0003)', 28 February 2022, available at [https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Oilseeds%20and%20Products%20Update\\_Buenos%20Aires\\_Argentina\\_AR2022-0003.pdf](https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Oilseeds%20and%20Products%20Update_Buenos%20Aires_Argentina_AR2022-0003.pdf)

<sup>175</sup> 1.1 million tonnes of direct imports from Paraguay plus 0.67 million tonnes embedded in the 7.7 million tonnes of European imports of Argentinian soybean meal make 1.7 million metric tonnes of Paraguayan soy, equivalent to 5.17% of the 34.3 million metric tonnes of European imports reported in: IDH (2021) 'European Soy Monitor; Insights on the uptake of responsible and deforestation-free soy in 2019'. June 2021.

<sup>176</sup> Hugh Bronstein and Daniela Desantis, 'Paraguay soybean exports to top Argentina's for first time', for Reuters, 4 June 2018, available at <https://www.reuters.com/article/us-paraguay-soybeans-analysis-idUSKCN1J00E5>, accessed on 30 September 2022.

<sup>177</sup> Six percent of the nearly 12 million hectares land use footprint for Europe's imports of soy, as cited in:

Greenpeace European Unit, 'For Local and ecological agriculture', 30 September 2020, available at <https://www.greenpeace.org/eu-unit/issues/nature-food/46173/for-local-and-ecological-agriculture/>, accessed 20 November 2022.

<sup>178</sup> Data collated from: Efeca & Partnership for Forests report: 'UK Roundtable on Sustainable Soya: Annual progress report, 2020', [https://www.efeca.com/wp-content/uploads/2020/10/UK-RT-on-Sustainable-Soya-APR-19\\_20-final.pdf](https://www.efeca.com/wp-content/uploads/2020/10/UK-RT-on-Sustainable-Soya-APR-19_20-final.pdf); and 'UK Roundtable on Sustainable Soya: Annual progress report 2021', <https://www.efeca.com/wp-content/uploads/2021/12/UK-RTSS-APR-2021.pdf>, accessed on 20 May 2022, and on 30 September 2022.

<sup>179</sup> Six percent of the nearly 12 million hectares land use footprint for Europe's imports of soy, as cited in: Greenpeace European Unit, 'For Local and ecological agriculture', 30 September 2020, available at <https://www.greenpeace.org/eu-unit/issues/nature-food/46173/for-local-and-ecological-agriculture/>, accessed 20 November 2022.

<sup>180</sup> Reuters, 'Paraguay grain ships cut loads, face delays, as river levels drop', 27 August 2021, available at <https://www.reuters.com/article/us-paraguay-river-idAFKBN2FS19T>

US Department of Trade and Commerce, 'Paraguay Country Commercial Guide', available at <https://www.trade.gov/country-commercial-guides/paraguay-paraguay-parana-waterway-system#:~:text=The%20Paraguay%20and%20Parana%20Rivers%20jointly%20form%20a%203%2C302%2Dkilometer,80%20percent%20of%20Paraguay's%20trade>. All accessed 20 November 2022.

<sup>181</sup> Financial Times, 'Paraguay's big rivers shape its progress as a shipping dynamo', 11 June 2019, available at <https://www.ft.com/content/4c086044-56cf-11e9-8b71-f5b0066105fe>, accessed 20 November 2022.

World Bank, 'Logística de la Soja Argentina Paraguay Uruguay', 2016, available at [https://observatorio.mtop.gub.uy/docs/Logistica\\_de\\_la\\_soja.pdf](https://observatorio.mtop.gub.uy/docs/Logistica_de_la_soja.pdf), accessed 20 November 2022.

<sup>182</sup> Clarin, 'La producción de soja convirtió Paraguay en una potencia agrícola', 16 January 2021, available at [https://www.clarin.com/rural/produccion-soja-convirtio-paraguay-potencia-agricola\\_0\\_JY-pJXSj5.html](https://www.clarin.com/rural/produccion-soja-convirtio-paraguay-potencia-agricola_0_JY-pJXSj5.html), accessed 20 November 2022.

<sup>183</sup> World Bank, 'Logística de la Soja Argentina Paraguay Uruguay', 2016, available at [https://observatorio.mtop.gub.uy/docs/Logistica\\_de\\_la\\_soja.pdf](https://observatorio.mtop.gub.uy/docs/Logistica_de_la_soja.pdf), accessed 20 November 2022. See page 69

<sup>184</sup> PAMPA, 'O mercado da soja no Paraguai: concentração e transnacionalização', 20 November 2019, available at [http://www.scielo.org.ar/scielo.php?script=sci\\_arttext&pi](http://www.scielo.org.ar/scielo.php?script=sci_arttext&pi)

d=S2314-02082018000200006, accessed 20 November 2022.

<sup>185</sup> 29 ports, 12 with processing plants attached. See: Bolsa de Comercio de Rosario, Rosario hub remained second in the world agribusiness port nodes ranking in 2021, undated, available at <https://www.bcr.com.ar/es/mercados/mercado-de-granos/news/rosario-hub-remained-second-world-agribusiness-port-nodes-ranking>, accessed 20 November 2022.

Clarín, 'El Gran Rosario revalidó su título como primer polo exportador mundial de soja', 29 March 2022, available at [https://www.clarin.com/rural/gran-rosario-revalido-titulo-primer-polo-exportador-mundial-soja-derivados\\_0\\_Pgm7qfPKUR.html](https://www.clarin.com/rural/gran-rosario-revalido-titulo-primer-polo-exportador-mundial-soja-derivados_0_Pgm7qfPKUR.html), accessed 20 November 2022.

<sup>186</sup> ADM Agro Muelle El Transito. See <https://www.argentina.gob.ar/puertos-vias-navegables-y-marina-mercante/informaci%C3%B3n-portuaria/adm-agro-muelle-el-transito>, accessed 20 November 2022.

<sup>187</sup> Cargill Muelle Quebracho. See <https://www.argentina.gob.ar/puertos-vias-navegables-y-marina-mercante/informaci%C3%B3n-portuaria/cargill-muelle-quebracho>, accessed 20 November 2022.

<sup>188</sup> Terminal Seis. See [http://www.terminal6.com.ar/contenidos/2014/03/07/Editorial\\_2761.php](http://www.terminal6.com.ar/contenidos/2014/03/07/Editorial_2761.php), accessed 20 November 2022.

<sup>189</sup> ADM, 'ADM to build port terminal in Nueva Palmira, Uruguay', 19 May 2011, available at <https://www.adm.com/en-us/news/news-releases/2011/5/adm-to-build-port-terminal-in-nueva-palmira-uruguay/>, accessed 20 November 2022.

<sup>190</sup> United States Department of Agriculture, Foreign Agricultural Service (USDA-FAS) and the Global Agricultural Information Network (GAIM), 'Oilseeds and Products Update (AR2022-0003)', 28 February 2022, available at [https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Oilseeds%20and%20Products%20Update\\_Buenos%20Aires\\_Argentina\\_AR2022-0003.pdf](https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Oilseeds%20and%20Products%20Update_Buenos%20Aires_Argentina_AR2022-0003.pdf), accessed on 17 May 2022:

Asim Anand, in S&P Global Commodity Insights, 'Paraguayan drought likely to keep Argentinian soy crush underutilized in Q1', 15 February 2022, available at <https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/agriculture/021522-paraguayan-drought-likely-to-keep-argentinian-soy-crush-underutilized-in-q1>, accessed July 2022 and 28 September 2022.

<sup>191</sup> Henry Saker-Clark, 'UK's biggest chicken firm warns prices to soar 10% due to supply issues', 31 October 2021, available at <https://www.standard.co.uk/news/uk/food-government-co2-hgv-b960352.html>, accessed 20 November 2022.

<sup>192</sup> Poultry World, 'British 'chicken king' warns of serious food crisis', 25 November 2021, available at <https://www.poultryworld.net/poultry/british-chicken-king-warns-of-serious-food-crisis/>, accessed on 26 September 2022.

<sup>193</sup> 2 Sisters Food Group, '2SFG soy sourcing policy', June 2022, available at <https://www.2sfg.com/PDF/how-we-work/2022/2SFG%20Soy%20policy%20June%202022.pdf>, accessed in July 2022;

2 Sisters Food Group, 'Soya Sourcing Policy, 2021, available at <https://www.2sfg.com/PDF/how-we-work/2021/2SFG%20Policy%20on%20soy%202021.pdf>, accessed on 25 May 2022.

<sup>194</sup> Cefetra UK, 'Soybean Meal sourced in South America for use in the United Kingdom & Ireland (preliminary 2020 figures)', undated, available at <https://cefetra.co.uk/wp-content/uploads/2020/06/SustainabilityOrigination.pdf>, accessed May 2022 and 20 September 2022.

<sup>195</sup> Bureau van Dijk (ORBIS) data downloaded on 15 May 2022 reports that 2Agriculture Limited is a wholly owned subsidiary of Amber REI Holdings Limited, which is in turn 100% owned by Boparan Private Investments Limited in which Baljinder Kaur Boparan and Ranjit Singh Borparan each hold 50% ownership.

<sup>196</sup> Bureau van Dijk (ORBIS) data downloaded on 15 May 2022 reports that AB Agri Limited is wholly owned by A.B.F.Holdings Limited, of which 100% of shares are owned by ABF Investments PLC, of which 100% of shares are owned by Associated British Foods PLC. ABF is majority owned by Wittington Investments Limited, which is in turn majority owned by the Garfield Weston Foundation.

<sup>197</sup> Bureau van Dijk (ORBIS) data downloaded on 15 May 2022 reports that ForFarmers UK Limited is 100% ultimately owned by Forfarmers N.V., which was founded by Coöperatie Fromfarmers U.A., which remains a major shareholder.

<sup>198</sup> Chloe Ryan, for Poultry News, 'ForFarmers and 2Agriculture announced merger', 11 July, available at <https://www.poultrynews.co.uk/business-politics/forfarmers-and-2agriculture-announced-merger.html#:~:text=ForFarmers%20and%202Agriculture%20have%20come,of%20compound%20feed%20per%20year>, accessed in July 2022 and on 20 September 2022.

<sup>199</sup> Analysis of AIS shipping data and records from shipping agents.

<sup>200</sup> Analysis of AIS data, Argentinean government records and records from shipping agents.

<sup>201</sup> Analysis of AIS data, Argentinean government data and records from shipping agents.

<sup>202</sup> ABN has a long-established commercial relationship with Hook 2 Sisters, its largest client for poultry feed. The firm's one poultry-exclusive feed mill, in Flixborough, supplies more than three-quarters of its soy to Hook 2

Sisters (Source: All About Feed, 'ABN acquires Flixborough feed mill', available at <https://www.allaboutfeed.net/home/abn-acquires-flixborough-feed-mill/>, accessed on 26 September 2022; and information from industry insiders.) ABN uses significant volumes of Paraguayan soy, telling Global Witness in a July 2022 email that it comprised 12% of its 2020 and 11% of its 2021 soy inputs.

<sup>203</sup> Information from industry insiders combined with logistical analysis, press reports, and government documents. See also:

Poultry World, '2 Sisters builds its business in the south west', 16 May 2017, available at <https://www.poultryworld.net/uk/2-sisters-builds-its-business-in-the-south-west/>; Poultry World, '2 Sisters builds its business in the south west', 16 May 2017, available at <https://www.poultryworld.net/uk/2-sisters-builds-its-business-in-the-south-west/>, accessed 20 November 2022.

Office of Fair Trading, 'Anticipated acquisition by AB Agri of the business and assets of the Uffculme Feed Mill', 15 September 2011, available at <https://assets.publishing.service.gov.uk/media/555de31c40f0b666a200005a/AB-Agri.pdf> <https://assets.publishing.service.gov.uk/media/555de31c40f0b666a200005a/AB-Agri.pdf>, accessed 20 November 2022.

<sup>204</sup> Transparent Farms UK, 'Swanhams Poultry Unit', undated, available at: <https://transparentfarms.org.uk/facilities/vp3337zswanhams-poultry-unit>; Transparent Farms UK, 'Swanhams Poultry Unit', undated, available at: <https://transparentfarms.org.uk/facilities/vp3337zswanhams-poultry-unit>, accessed 20 November 2022.

2 Sisters, 'UK Poultry', available at <https://www.2sfg.com/Divisions/UK-Poultry>, and: UK Poultry, Pandemic turbulence affects sales and profits of Hook 2 Sisters, 5 May 2021, available at: <https://www.poultrynews.co.uk/news/pandemic-turbulence-affects-sales-and-profits-at-hook2sisters.html>, accessed 20 November 2022.

Technically, a mega-farm holds at least 125,000 birds and is known as a Concentrated Animal Feed Operation or CAFO. See The BIJ, 'Intensive Farming in the UK, by Numbers', 17 July 2017, available at: <https://www.thebureauinvestigates.com/stories/2017-07-17/intensive-numbers-of-intensive-farming> See The BIJ, 'Intensive Farming in the UK, by Numbers', 17 July 2017, available at: <https://www.thebureauinvestigates.com/stories/2017-07-17/intensive-numbers-of-intensive-farming>, accessed 20 November 2022.

<sup>205</sup> Poultry World, '2 Sisters builds its business in the south west', 16 May 2017, available at <https://www.poultryworld.net/uk/2-sisters-builds-its-business-in-the-south-west/>. Poultry World, '2 Sisters

builds its business in the south west', 16 May 2017, available at <https://www.poultryworld.net/uk/2-sisters-builds-its-business-in-the-south-west/>, accessed 20 November 2022.

<sup>206</sup> Jon Ungeod-Thomas, in The Guardian, 'A million UK chickens 'die needlessly each week to keep prices low'', 16 July 2022, available at [https://www.theguardian.com/world/2022/jul/16/a-million-uk-chickens-die-needlessly-each-week-to-keep-prices-low?utm\\_term=Autofeed&CMP=tw\\_t\\_gu&utm\\_medium&utm\\_source=Twitter](https://www.theguardian.com/world/2022/jul/16/a-million-uk-chickens-die-needlessly-each-week-to-keep-prices-low?utm_term=Autofeed&CMP=tw_t_gu&utm_medium&utm_source=Twitter), accessed on 26 September 2022.

Alison Caffyn, in The Conversation, 'Revealed: true cost of Britain's addiction to factory-farmed chicken', 19 April 2021, available at <https://theconversation.com/revealed-true-cost-of-britains-addiction-to-factory-farmed-chicken-158555>, accessed on 2 September 2022.

<sup>207</sup> Alison Caffyn, in The Conversation, 'Revealed: true cost of Britain's addiction to factory-farmed chicken', 19 April 2021, available at <https://theconversation.com/revealed-true-cost-of-britains-addiction-to-factory-farmed-chicken-158555>, accessed on 2 September 2022.

<sup>208</sup> Simon Goodley, in The Guardian, 'The chicken run: blood, sweat and deceit at a UK poultry plant', 28 September 2018, available at: <https://www.theguardian.com/business/2017/sep/28/blood-sweat-deceit-west-midlands-poultry-plant>, accessed on 26 September 2022.

2 Sisters, 'UK Poultry', undated, available at <https://www.2sfg.com/Divisions/UK-Poultry>; 2 Sisters, 'UK Poultry', undated, available at <https://www.2sfg.com/Divisions/UK-Poultry>, accessed 20 November 2022.

<sup>209</sup> The Nota A loaded 28,176 tonnes of Paraguayan soymeal at ADM's facilities in Nueva Palmira on 15 July 2022, delivering it to bulk storage facilities in Seaforth on 13 August 2022; The Zante loaded 9439 tonnes of Paraguayan soymeal at ADM's facilities in Nueva Palmira on 9 May 2022, delivering it to bulk storage facilities in Seaforth on 7 June. Source: analysis of AIS data and records of shipping agents.

<sup>210</sup> Supply chain insights based on discussions with industry insiders and Global Witness's own logistical analysis. 2Agriculture feed locations are published on its website, at: <https://www.2agriculture.com/locations/>, accessed in June 2022 and on 26 September 2022. See also: Poultry World, '2 Sisters invests in biomass boilers on UK poultry farms', 21 April 2014, available at <https://www.poultryworld.net/poultry/2-sisters-invests-in-biomass-boilers-on-uk-poultry-farms/> See also: Poultry World, '2 Sisters invests in biomass boilers on UK poultry farms', 21 April 2014, available at <https://www.poultryworld.net/poultry/2-sisters-invests-in-biomass-boilers-on-uk-poultry-farms/>, accessed 20 November 2022.

<sup>211</sup> These include Brynford Poultry Farm, Lixwm Poultry Farm, Mynydd Llan Poultry Farm, Llyg Helyg Poultry Farm, Merilyn Bach Poultry Farm, and the Racecourse Poultry Unit near Pantasaph. Transparent Farms, <https://transparentfarms.org.uk/map>, accessed 20 November 2022.

<sup>212</sup> The location of 2 Sisters' Sandycroft processing plant is detailed on the company's website at <https://www.2sfg.com/Divisions/UK-Poultry>; <https://www.2sfg.com/Divisions/UK-Poultry>, accessed 20 November 2022. None of the supply chain links between farms and the Sandycroft processing plant were disputed by 2 Sisters when asked to comment on Global Witness' findings.

<sup>213</sup> This was in three shipments: the Globe Cleopatra loaded 9000 tonnes of Paraguayan soymeal at Cargill Muelle Quebracho on 27 November 2021, delivering it to Cargill's facilities in Seaforth on 28 December; The Ultra Fitz Roy loaded 30,878 tonnes of Paraguayan soymeal at Cargill Muelle Quebracho on 24 July 2021, delivering it to Cargill's facilities in Seaforth on 21 August; and The NBA Magritte loaded 20,000 tonnes of Paraguayan soymeal at Cargill Muelle Quebracho on 17 January 2021, delivering it to Cargill's facilities in Seaforth on 16 February. Source: analysis of AIS data from Refinitiv Eikon and MarineTraffic combined with Argentinean government data from the Ministerio de Agricultura, Ganadería y Pesca.

<sup>214</sup> 6 July 2022 response from AB-Agri, parent company of ABN, to Global Witness' June 2022 Soy Sourcing Survey.

<sup>215</sup> Alexandra Heal et al, for Unearthed, 'Soya linked to fires and deforestation in Brazil feeds chicken sold on the British high street', 25 November 2020, available at <https://unearthed.greenpeace.org/2020/11/25/brazil-fires-deforestation-tesco-nandos-mcdonalds/>, accessed in December 2022 and on 26 September 2022.

<sup>216</sup> The three shipments we identified were: the Star Carioca: left Terminal 6 on 6 May 2022 carrying 6600t Py soymeal to CEFETRA in the UK. Arrived at Belfast anchorage on 3 June, discharged into facilities on Stormont Wharf, at the site of CEFETRA's storage facility. Sources: Analysis of AIS data and records of shipping agents. The Yan Dang Hai: left Terminal 6 on 11 May 2022 with 7760t Paraguayan soymeal. Sources: Analysis of AIS data and records of shipping agents. Crimson Ace: left Terminal Seis on 11/06/22 with 3900t of Paraguayan soymeal. Sources: Analysis of AIS data and records of shipping agencies.

<sup>217</sup> ABN parent company AB-Agri told Global Witness it uses Cefetra's CRS certification scheme and did not deny this included Paraguayan soy for use in fulfilling 2 Sisters' poultry feed requirements, in correspondence during July and September 2022.

<sup>218</sup> None of the companies that provided comments on 26 August Global Witness letters to each, detailing our findings, refuted that Cefetra sells Paraguayan soy supplied by Bunge to ABN, 2Agriculture, and ForFarmers,

and that this soy is used by those companies to produce animal feed sold to farms producing chickens for 2 Sisters.

<sup>219</sup> Danish Crown, 'Who we are', undated, available at <https://www.danishcrown.com/en-gb/about-us/we-take-the-lead/>, accessed on 21 September 2022.

<sup>220</sup> Danish Crown, 'Group Animal Welfare Position Statement', undated, available at <https://www.danishcrown.com/media/2880/group-animal-welfare-position-statement.pdf>, accessed in June 2022, and on 26 September 2022.

<sup>221</sup> Rotecna, 'Export and efficiency, keys to the Danish pig sector', 19 January 2021, available at <https://www.rotecna.com/en/blog/export-and-efficiency-keys-to-the-danish-pig-sector/>, accessed in August and on 26 September 2022.

<sup>222</sup> University of Illinois, 'Nutritional value of soy products fed to pigs', undated, available at [https://nutrition.ansci.illinois.edu/sites/default/files/Swin\\_eFocus004.pdf](https://nutrition.ansci.illinois.edu/sites/default/files/Swin_eFocus004.pdf) University of Illinois, 'Nutritional value of soy products fed to pigs', undated, available at [https://nutrition.ansci.illinois.edu/sites/default/files/Swin\\_eFocus004.pdf](https://nutrition.ansci.illinois.edu/sites/default/files/Swin_eFocus004.pdf), accessed 20 November 2022.

<sup>223</sup> WattPoultry, 'Top ten European animal feed companies', 23 October 2018, available at <https://www.wattagnet.com/articles/35936-top-10-european-animal-feed-companies>, accessed 20 November 2022.

Feed Strategy, 'Top 28 European animal feed companies', 28 June 2016, available at <https://www.feedstrategy.com/animal-feed-manufacturing/infographic-top-28-european-animal-feed-companies/>, accessed 20 November 2022.

<sup>224</sup> Denmark imports 1.7m tonnes of soy each year, just over half of which is fed to pigs. Feed Navigator, Danish Crown moves to ensure its soy value chain is deforestation-free as report calls out the company on its soy sustainability policies, available at <https://www.feednavigator.com/Article/2020/05/04/Spotlight-on-Danish-Crown-and-soy-sustainability-policies>, accessed 20 November 2022.

<sup>225</sup> Feed Strategy, 'Danish Agro Group', undated, available at <https://www.feedstrategy.com/company/danish-agro-group/>, accessed 20 November 2022.

<sup>226</sup> Danish Agro communication with Global Witness, 16 September 2022.

<sup>227</sup> Danish Agro, 'Danish Agro udvider pa Fredericia Havn', 14 December 2020, available at

<https://danishagro.dk/om-danish-agro/presse/press-releases/danish-agro-udvider-paa-fredericia-havn?PID=20514&Action=1>, accessed 20 November 2022.

<sup>228</sup> The Mandarin Phoenix loaded 28,000 tonnes of Paraguayan soymeal at ADM El Transito in Rosario on 22

November 2021, delivering it to Danish Agro's leased warehouse facilities at Federicia on 22 December. The Amis Unicorn loaded 20,000 tonnes of Paraguayan soymeal at ADM El Transito in Rosario on 25 May 2021, delivering it to Danish Agro's leased warehouse facilities at Federicia on 24 June 2021. For Mandarin Phoenix: AIS data sourced from Refinitiv Eikon. For ADM El Transito, analysis of data from shipping agents. For Danish Agro in Federicia: AIS data shows it docked at Centerhavn Berth 22 (<http://www.4allports.com/port-mapping-fredericia-denmark-pid95.html>), the site of storage facilities that Danish Agro rents from Associated Danish Ports. See: <https://danishagro.dk/om-danish-agro/presse/press-releases/danish-agro-udvider-paa-fredericia-havn?PID=20514&Action=1>, accessed 20 November 2022. For Amis Unicorn: analysis of AIS data from Refinitiv Eikon and analysis of data from shipping agents.

<sup>229</sup> Danish Agriculture and Food Council, 'The Feed', undated, available at

<https://agricultureandfood.co.uk/pig-production/primary-production/quality/the-feed#:~:text=The%20main%20ingredients%20in%20Danish,also%20added%20to%20the%20feed>, accessed 20 November 2022.

<sup>230</sup> Danish Crown, 'Datasamarbejde skal give de danske landmænd mere viden', 7 October 2021, available at <https://www.danishcrown.com/da-dk/kontakt/presse/nyheder/datasamarbejde-skal-give-de-danske-landmaend-mere-viden>, accessed 20 November 2022.

<sup>231</sup> Danish Crown, 'Amazing milestone to be reached by Horsens Abattoir', 6 April 2016, available at <https://www.danishcrown.com/da-dk/kontakt/presse/nyheder/Amazing-Milestone-to-be-Reached-by-Horsens-Abattoir/>, accessed 20 November 2022.

Aidan Fortune, Food Navigator, 'Danish Crown to modernise slaughtering facilities', 5 December 2019, available at <https://www.foodnavigator.com/Article/2019/12/05/Danish-Crown-to-modernise-slaughtering-facilities>, accessed 20 November 2022.

<sup>232</sup> DLG, 'Sustainable soy', undated, available at <https://www.dlg.dk/en/DLG-koncernen/sustainability/B%C3%A6redygtigt-soja>, accessed 20 November 2022.

<sup>233</sup> Global Witness communication with Danish Crown.

<sup>234</sup> Automatic Identification System (AIS) ship location data published by Refinitiv Eikon gave the unloading location of the Apogee Endeavour as 56.145988° 10.229660°. This is alongside facilities marked in Google Maps as 'Århus Bulkterminal', and 'dlg.dk', linking to DLG's corporate website is listed as the website for the facility on Google Maps (See <https://www.google.co.uk/maps/place/%C3%85rhus+Bulkterminal/@56.146,10.2296667,383m/data=!3m1!1e3!4m>

12!1m5!3m4!2zNTbCsDA4JzQ1LjYiTiAxMMkWMnNDYuOCJF!8m2!3d56.146!4d10.2296667!3m5!1s0x464c3f7901d9ca03:0x2b045bfac475f298!8m2!3d56.1462326!4d10.231613!16s%2Fg%2F11cn6dspdc), accessed 20 November 2022.

Multiple other sources also indicate 'Århus Bulkterminal' is a DLG facility, including: <https://www.degulesider.dk/%c3%a5rhus+bulkterminal+aarhus+c/66925297/firma>, <https://viborg-folkeblad.dk/artikel/ny-dlg-terminal-klar-p%C3%A5-havnen-i-aarhus-2018-2-22>, <https://dma.mst.dk/vis-virksomhed/4b2e9d9d-e94c-43de-bb65-a0f54243272f>, <https://www.proff.dk/roller/%C3%A5rhus-bulkterminal/aarhus-c/korn-r%C3%A5tobak-s%C3%A5varer-og-fodervarer-engros/GOIAG1110P1/>, accessed 20 November 2022.

<sup>235</sup> Emails on 16 and 9 September 2022 from DLG, responding to 26 August letter from Global Witness detailing our findings, and 12 September Global Witness request for clarification from DLG.

<sup>236</sup> Danish Crown's agreement with Danish Agro is detailed by Danish Crown in 'Data collaboration must give Danish farmers more knowledge', 7 October 2021, available at <https://www.danishcrown.com/da-dk/kontakt/presse/nyheder/datasamarbejde-skal-give-de-danske-landmaend-mere-viden>, accessed in June 2022 and on 23 September 2022.

Danish Crown's agreement with DLG is detailed by Danish Crown in 'Data sharing between cooperatives must increase production efficiency and contribute to a green transition', 26 November 2020, available at <https://www.danishcrown.com/da-dk/kontakt/presse/nyheder/datadeling-mellem-andelselskaber-skal-oege-produktionseffektiviteten-og-bidrage-til-groen-omstilling/>, accessed in May 2022 and on 23 September 2022.

<sup>237</sup> 2 Sisters Food Group, 'About us', undated, available at <https://www.2sfg.com/About-us>, accessed in May 2022 and September 2022.

<sup>238</sup> Nando's, 'Who Supplies you with Chicken?', undated FAQ, available at <https://help.nandos.co.uk/hc/en-gb/articles/360016229297-Who-Supplies-You-With-Chicken->, accessed in June 2022 and on 17 September 2022.

<sup>239</sup> Chloe Ryan, in Poultry News, '2 Sisters Food Group invests in precision livestock farming', 20 November 2019, available at <https://www.poultrynews.co.uk/production/broiler-production/2-sisters-food-group-invests-in-precision-livestock-farming.html>, accessed in July 2022 and on 17 September 2022.

<sup>240</sup> 2 Sisters Food Group, 'About us', undated, available at <https://www.2sfg.com/About-us>, accessed in May 2022 and September 2022.

<sup>241</sup> 12 July 2022 emails from Waitrose, responding to Global Witness' July 2022 Soy Sourcing Survey.

<sup>242</sup> Mike Stones, '2 Sisters slams new claims of poor production standards', 20 December 2017, available at <https://www.foodmanufacture.co.uk/Article/2017/12/20/2-Sisters-hits-back-at-new-claims-of-poor-production-standards>, accessed in June 2022 and on 17 September 2022.

<sup>243</sup> Simon Goodley, for The Guardian, 'UK's top supplier of supermarket chicken fiddles food safety dates', 28 September 2017, available at <https://www.theguardian.com/business/2017/sep/28/uks-top-supplier-of-supermarket-chicken-fiddles-food-safety-dates>, accessed on 17 September 2022.

Tesco did not deny its Willow Farm brand is still produced by 2 Sisters when the information was presented to it by Global Witness on 26 August 2022.

<sup>244</sup> E4S, '2 Sisters to Create 200 Carlisle Jobs with New M&S Contracts', 28 August 2018, available at <https://www.e4s.co.uk/news/articles/view/2284/job-news-and-information/part-time/2-Sisters-To-Create-200-Carlisle-Jobs-With-New-MS-Contracts>, accessed in July 2022 and on 17 September 2022.

M&S did not deny its GastroPub brand was manufactured by 2 Sisters when the information was presented to it by Global Witness on 26 August 2022.

<sup>245</sup> Laure Maloney, in Wired, 'Inside the Factory Where They Make 'Tulip Pork Luncheon,' the Danish Spam', 5 September 2016, available at <https://www.wired.com/2016/09/allistair-wiper-spam-denmark/>, accessed on 28 September 2022.

Danish Crown's website now says it produces over 150 million cans - see Danish Crown, 'Distributor of Danish Crown Foods' Products', available at <https://www.danishcrown.com/en-gb/about-us/who-we-are/subsidiaries/danish-crown-foods/distributor/> accessed on 28 September 2022.

<sup>246</sup> Glenda Cooper, in The Independent, 'Spam, spam, spam... er, no more spam', 24 December 1997 available at <https://www.independent.co.uk/news/spam-spam-spam-er-no-more-spam-1290411.html>, accessed in June 2022 and on 17 September 2022.

<sup>247</sup> Spam chopped pork and ham product available at Sainsbury's. <https://www.sainsburys.co.uk/gol-ui/product/cold-meat/spam-chopped-pork---ham-340g>, accessed in July 2022.

<sup>248</sup> Spam chopped pork and ham product available at Tesco at <https://www.tesco.com/groceries/en-GB/products/255206418>, accessed in July 2022.

<sup>249</sup> Spam chopped pork and ham product available at Asda at <https://groceries.asda.com/product/cold-meats-corned-beef/spam-chopped-pork-and-ham/390143>, accessed in July 2022.

<sup>250</sup> Spam Fritters product available at Morrisons at <https://groceries.morrisons.com/products/spam-fritters-547906011>, accessed in July 2022.

<sup>251</sup> Spam chopped pork and ham product available at Coop at <https://shop.coop.co.uk/product/5da70aeb-72a6-42ac-85b4-5362634b165e>, accessed in July 2022.

<sup>252</sup> Spam chopped pork and ham product available at Waitrose at <https://www.waitrose.com/ecom/products/spam-chopped-pork-ham/023432-11381-11382>, accessed in July 2022.

<sup>253</sup> Spam chopped pork and ham product available at Iceland at <https://www.iceland.co.uk/p/spam-chopped-pork-and-ham-2-x-200g/36682.html>, accessed in July 2022.

<sup>254</sup> Tulip premium cured chicken breast product available at Sainsbury's at <https://www.sainsburys.co.uk/gol-ui/product/cold-meat/tulip-premium-cured-chicken-breast-200g>, accessed in July 2022.

<sup>255</sup> Various Tulip brand tinned pork and chicken products are available at Tesco at <https://www.tesco.com/groceries/en-GB/search?query=Tulip>, accessed in July 2022.

<sup>256</sup> List of 'active food suppliers used for the production of Sainsbury's branded products at January 2022' available at [https://www.about.sainsburys.co.uk/~/\\_media/Files/S/Sainsburys/CRS%20Policies%20and%20Reports/Food%20Supplier%20List%20Tier%201%202022.pdf](https://www.about.sainsburys.co.uk/~/_media/Files/S/Sainsburys/CRS%20Policies%20and%20Reports/Food%20Supplier%20List%20Tier%201%202022.pdf), accessed in July 2022.

<sup>257</sup> Sainsbury's Lean Ham pearshaped tin product, available at <https://www.sainsburys.co.uk/gol-ui/product/cold-meat/sainsburys-lean-ham--pearshaped-340g>, accessed in July 2022.

<sup>258</sup> Sainsbury's Chopped pork and ham product available at <https://www.sainsburys.co.uk/gol-ui/product/cold-meat/sainsburys-chopped-pork-with-ham-200g>, accessed in July 2022.

<sup>259</sup> 13 September email from Sainsbury's responding to information submitted by Global Witness on 26 August 2022.

<sup>260</sup> List of Lidl food suppliers, 16 February 2022, available at <https://unternehmen.lidl.de/pdf/show/49200>, accessed in July 2022.

<sup>261</sup> Kevin White, in The Grocer, 'Tulip loss of M&S contract adds to Danish Crown's woes', 18 February 2019, available at <https://www.thegrocer.co.uk/meat/tulip-loses-big-mands-contract-to-add-to-danish-crowns-woes/590364.article>, accessed in June 2022 and on 17 September 2022.

<sup>262</sup> 14 September email from M&S responding to 26 August letter from Global Witness.

<sup>263</sup> In a 22 July 2022 response from Aldi Sud to Global Witness' Soy Sourcing Survey, the German parent company of Aldi UK told us Danish Crown supplied Aldi UK.

<sup>264</sup> E.g., SuperTops pizza topping products available at <https://marfast.co.uk/suppliers/supertops.html> & <https://www.tquality.co.uk/frozen-food/pizza-toppings.html> & <https://www.jjfoodservice.com/search?advanced=true&b=EN-MW&brand=Super%20Tops&page=0&q=%2A&size=12>, all accessed in July 2022.

<sup>265</sup> A range of Tulip brand tinned pork and beef products available at Carrefour at <https://www.carrefour.fr/s?q=Tulip>, accessed in July 2022.

<sup>266</sup> Google presents a range of webpages indicating Intermarché offers Tulip brand pork and other meat products, available at [https://www.google.com/search?q=intermarche+AND+Tulip&tbm=isch&chips=q:intermarche+and+tulip,online\\_chips:jambon:\\_FUcK1vdP0A%3D&rlz=1C1GCEA\\_enGB971GB971&hl=en-US&sa=X&ved=2ahUKEwjc7MWTraP4AhV2g84BHcqdBtoQ4lYoAHoECAEQHQ&biw=1263&bih=520](https://www.google.com/search?q=intermarche+AND+Tulip&tbm=isch&chips=q:intermarche+and+tulip,online_chips:jambon:_FUcK1vdP0A%3D&rlz=1C1GCEA_enGB971GB971&hl=en-US&sa=X&ved=2ahUKEwjc7MWTraP4AhV2g84BHcqdBtoQ4lYoAHoECAEQHQ&biw=1263&bih=520), accessed in July 2022

<sup>267</sup> A Tulip 'Delice de Jambon' tinned pork product available at Monoprix at [https://courses.monoprix.fr/products/MPX\\_3788909/details](https://courses.monoprix.fr/products/MPX_3788909/details), accessed in July 2022.

<sup>268</sup> Tulip brand tinned 'Delice de Jambon' product available at Auchan at <https://www.auchan.fr/tulip-delice-de-jambon-preparation-a-base-de-jambon-hache/pr-C1240714>, accessed in July 2022.

<sup>269</sup> A Tulip brand 'Pulled Pork' product available at Edeka at <https://www.1prospekte.de/i/edeka/tulip-pulled-pork-oder-pulled-turkey-256679>, accessed in July 2022.

<sup>270</sup> A Tulip brand 'Pulled Pork' product available at REWE at <https://shop.rewe.de/p/tulip-pulled-pork-barbeque-550g/2161432>, accessed in July 2022.

<sup>271</sup> A Tulip brand tinned 'Frühstücksfleisch' ('Breakfast meat') product available at NETTO, at <https://www.netto-online.de/tulip-fruehstuecksfleisch-340-g-12er-pack/p-2161857000>, accessed in July 2022.

<sup>272</sup> A Tulip brand tinned 'Frühstücksfleisch' ('Breakfast meat') product available at Kaufland at [https://www.kaufland.de/product/352867141/?search\\_vale=tulip](https://www.kaufland.de/product/352867141/?search_vale=tulip), accessed in July 2022.

<sup>273</sup> A Tulip brand 'Pulled Pork vorgegartes Schweinefleisch' product available at METRO at <https://produkte.metro.de/shop/pv/BTY-X72702/0032/0021/Tulip-Pulled-Pork-vorgegartes-Schweinefleisch-2-275-kg-Packung>, accessed in July 2022.

<sup>274</sup> Tulip brand Bacon available at Aldi Nord at <https://www.1prospekte.de/i/aldi-nord/tulip-bacon-57215>, accessed in July 2022.

<sup>275</sup> A range of Tulip brand tinned pork and cured bacon products available at Aldi Sud at <https://www.supermarktcheck.de/aldi-sued/sortiment/hersteller/tulip/>, accessed in July 2022.

<sup>276</sup> Justia, 'Brookdale Trademark details', available at <https://trademarks.justia.com/864/34/brookdale-86434021.html>, accessed in June 2022 and on 17 September 2022.

<sup>277</sup> Aldi Inc. is a US subsidiary of ALDI INTERNATIONAL SERVICES SE & CO. OHG, itself a subsidiary of Aldi Sud in Germany. Source: Bureau van Dijk (ORBIS).

<sup>278</sup> Panjiva data covering Tulip Food Company A/S, Danish Crown Foods A/S, Danish Crown USA/Danish Crown USA Inc, Majesty Inc.

<sup>279</sup> See Danish Crown, 'Tender Pork', at <https://www.danishcrown.com/en-gb/our-brands/tender-pork/>, accessed 20 November 2022.

<sup>280</sup> See Danish Crown, 'Pure Pork', at <https://www.danishcrown.com/en-gb/our-brands/pure-pork/>, accessed 20 November 2022.

<sup>281</sup> Deco, 'Danish Crown dal 1887 porta la qualità in tavola', available at: <https://supermercatideco.multicedi.it/static/news/Danish-Crown-dal-1887-porta-la-qualita-in-tavola--1545.aspx> accessed in June 2022 and on 29 September 2022.

<sup>282</sup> Danish Crown, 'Breakthrough for ABF meat in Germany', 19 January 2018, available at <https://www.danishcrown.com/da-dk/om-os/kontakt/presse/nyheder/breakthrough-for-abf-meat-in-germany/> accessed in July 2022 and on 17 September 2022;

Lebensmittel Praxis, 'Wurst aus 100 % antibiotikafreier Aufzucht', 14 June 2019, available at <https://lebensmittelpraxis.de/hit-2019/24773-anzeige-reinert-herzenssache-wurst-aus-100-antibiotikafreier-aufzucht.html>, accessed in July 2022 and on 17 September 2022; and <https://the-family-butchers.com/en/our-brands/brands/>, accessed 20 November 2022.

<sup>283</sup> See <https://sokolow.pl/en> - Sokołów reports that over 6% of the pork it uses is imported (Source: Sokołów, 'Information on production and cooperation between Sokołów SA and Polish farmers, undated, available at <https://sokolow.sa.pl/en/events/information-production-and-cooperation-between-sokolow-sa-and-polish-farmers>, accessed in July 2022, and on 17 September 2022);

Polish pork farmers rely on the import of piglets and weaners for almost 40% or pigs produced in the country, with as much as 85% of piglet imports coming from Denmark (source: Dutch Ministry of Agriculture, Nature and Food Quality, 'Polish Pork Market', 14 March 2022, available at <https://www.agroberichtenbuitenland.nl/actueel/nieuws/2022/03/14/polish-pork-market#:~:text=Currently%2C%20Polish%20pork%20pro>

duction%20depends,has%20decreased%20by%20almost%2050%25, accessed in July 2022 and on 17 September 2022);

Danish Crown owns a major piglet and weaner transport company, SPF-Danmark, which reports a 50% share of the Danish market in weaner pigs and that it trucks more than 2 million weaners abroad annually, including to Germany, Poland, the Czech Republic, Italy, and other countries (Source: SPF-Danmark Brochure, undated, available at <https://www.yumpu.com/en/document/read/9977693/spf-danmark-visit-sebrochuredk>, accessed in July 2022 and on 17 September 2022);

In its 9 September response to a 26 August 2022 letter from Global Witness, Danish Crown did not dispute that its subsidiary Sokołów uses pork meat imported from Danish Crown in Denmark, as well as pork from pigs originated in Denmark, including by Danish Crown Amba owner/members.

<sup>284</sup> A Sokołów ‘Best Silesia sausage’ product available at Sainsbury’s at <https://www.sainsburys.co.uk/gol-ui/product/snacking---cooked-sausage-44/sokolow-best-340g>, accessed in July 2022.

<sup>285</sup> A Sokołów ‘Bukowe Poultry and Pork Sausages’ product available at Tesco at [https://www.tesco.com/groceries/en-GB/products/307346674?sc\\_cmp=ppc\\*GHS%20-%20Grocery%20-%20New\\*MPX\\_Shopping\\_All\\_Other\\_Smart%20Shopping%20All%20Products\\_Other\\_Online%20Budget\\*All%20Products\\*PRODUCT\\_GROUP307346674\\*&ds\\_rl=1116322&gclid=EAlaIqobChMlg\\_zn6oCa-QIVtGLmCh2R0w2CEAQYASABEgJRKPD\\_BwE&gclsrc=aw.ds&selectedUrl=https%3A%2F%2Fdigitalcontent.api.tesco.com%2Fv2%2Fmedia%2Fghs%2F1414e513-53a5-4dfe-a2ce-7f7605aa94df%2F51044364-7376-4872-b4bf-f63c38c6b6e8.jpeg%3Fh%3D540%26w%3D540](https://www.tesco.com/groceries/en-GB/products/307346674?sc_cmp=ppc*GHS%20-%20Grocery%20-%20New*MPX_Shopping_All_Other_Smart%20Shopping%20All%20Products_Other_Online%20Budget*All%20Products*PRODUCT_GROUP307346674*&ds_rl=1116322&gclid=EAlaIqobChMlg_zn6oCa-QIVtGLmCh2R0w2CEAQYASABEgJRKPD_BwE&gclsrc=aw.ds&selectedUrl=https%3A%2F%2Fdigitalcontent.api.tesco.com%2Fv2%2Fmedia%2Fghs%2F1414e513-53a5-4dfe-a2ce-7f7605aa94df%2F51044364-7376-4872-b4bf-f63c38c6b6e8.jpeg%3Fh%3D540%26w%3D540), accessed in July 2022.

<sup>286</sup> A Sokołów ‘Polish Classic Hot Dogs’ product available at Morrisons at <https://groceries.morrisons.com/products/sokolow-polish-classic-hot-dogs-233680011>, accessed in July 2022.

<sup>287</sup> A Sokołów ‘Babuni Smoked Pork and Ham’ product available at Asda at <https://groceries.asda.com/product/chilled-meat-fish/sokolow-babuni-smoked-pork-ham/910003095252>, accessed in July 2022.

<sup>288</sup> See: United Nations, ‘Guiding Principles on Business and Human Rights’, 2011, [https://www.ohchr.org/documents/publications/guiding-principlesbusinessshr\\_en.pdf](https://www.ohchr.org/documents/publications/guiding-principlesbusinessshr_en.pdf), accessed on 05 October 2021;

OECD (2011), ‘OECD Guidelines for Multinational Enterprises’, OECD Publishing, <http://dx.doi.org/10.1787/9789264115415-en>, accessed at <https://www.oecd.org/daf/inv/mne/48004323.pdf> on 5 October 2021, accessed 20 November 2022.

OECD (2018), ‘OECD Due Diligence Guidance for Responsible Business Conduct’, <http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>, accessed on 5 October 2021;

United Nations, Declaration on the Rights of Indigenous Peoples, 13 September 2007, available at [https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP\\_E\\_web.pdf](https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf), accessed 20 November 2022.

<sup>289</sup> Our assessment that they are at structural risk of being directly linked to and contributing to human rights harms in Paraguay was put to all 41 companies we identified to be involved in Danish Crown’s and 2 Sisters’ supply chains or in selling their products, in letters sent on 26 August 2022. Of the 32 responses received by 21 September, only ADM refuted the risks involved, arguing that ‘Since the allegations of human rights harms linked to ADM’s supply chain cited in this report are inaccurate, there is no risk of having ADM’s customers in Europe exposed directly, or indirectly (embedded soy), to such issues’.

<sup>290</sup> 3Keel LLP, ‘Moving to deforestation free animal feed in Europe’, October 2021, available at <https://www.3keel.com/wp-content/uploads/2021/10/Soy-Report-2021.pdf>, accessed in May 2022, and on 22 September 2022.

<sup>291</sup> During June and July 2022, Global Witness sent surveys to: In the UK; 2 Sisters, 2Agriculture, ABN-Agri, ForFarmers, Asda, Sainsbury’s Morrison’s, Tesco, Lidl GB, M&S, Waitrose, Co-op, Iceland, KFC, McDonalds, Nando’s; in Denmark; Danish Crown, DLG, Danish Agro; in France; Carrefour, Intermarché, Monoprix, Auchan; in Germany; Edeka, REWE, Kaufland, METRO, Aldi Nord, Aldi Sud, Lidl Germany, The Family Butchers; and the consumer goods firms Nestle, Hormel Foods.

<sup>292</sup> See, for example: Global Witness, ‘Seeds of Conflict: How global commodity traders contribute to human rights abuses in Brazil’s soy sector’, 23 November 2021, available at <https://www.globalwitness.org/en/campaigns/environmental-activist/global-commodity-traders-are-fuelling-land-conflicts-in-brazils-cerrado/>, accessed 20 November 2022.

EarthSight, ‘There will be blood: the ugly truth behind cheap chicken’, 10 May 2022, available at <https://www.earth-sight.org.uk/investigations/there-will-be-blood>, accessed on 11 May 2022 and on 29 September 2022;

Mighty Earth et al, ‘No one wants to know how the sausage gets made’, 4 May 2020, available at <https://www.mightyearth.org/wp-content/uploads/How-the-sausage-gets-made-FINAL.pdf>, accessed 20 November 2022.

Unearthed and The Bureau of Investigative Journalism, ‘Cargill: the company feeding the world by helping destroy the planet’, 25 November 2021, available at <https://unearthed.greenpeace.org/2020/11/25/cargill-deforestation-agriculture-history-pollution/>, accessed 20 November 2022.

Amazon Watch, ‘Complicity in Destruction: How Northern consumers and financiers enable Bolsonaro’s assault on the Brazilian Amazon’, 25 April 2019, available at <https://amazonwatch.org/assets/files/2019-complicity-in-destruction-2.pdf>, accessed 20 November 2022.

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Anna Sophie Gross and Daniel Gross, in Mongabay, 'Amazon deforestation linked to McDonald's and British retail giants', 4 October 2017, available at <https://news.mongabay.com/2017/10/amazon-deforestation-linked-to-mcdonalds-and-british-retail-giants/>, accessed 20 November 2022.

<sup>293</sup> For example, The Consumer Goods Forum's (CGF) 'Forest Positive Coalition for Action' - itself a 2020 relaunch of a failed 2010 CGF commitment to end deforestation in member companies' supply chains by 2020. See: 'A letter to the Consumer Goods Forum: It's Time to Stop the Fires and Deliver on 'No Deforestation, No Peat, No Exploitation' Commitments' from a civil society coalition including Global Witness, 22 June 2020, available at [https://www.globalwitness.org/en/press-releases/a-letter-to-the-consumer-goods-forum-its-time-to-stop-the-fires-and-deliver-on-no-deforestation-no-peat-no-exploitation-commitments/#:~:text=June%202022%2C%202020-,Ten%20years%20ago%2C%20the%20Consumer%20Goods%20Forum%20\(CGF\)%20made,New%20York%20Declaration%20on%20Forests](https://www.globalwitness.org/en/press-releases/a-letter-to-the-consumer-goods-forum-its-time-to-stop-the-fires-and-deliver-on-no-deforestation-no-peat-no-exploitation-commitments/#:~:text=June%202022%2C%202020-,Ten%20years%20ago%2C%20the%20Consumer%20Goods%20Forum%20(CGF)%20made,New%20York%20Declaration%20on%20Forests), accessed 20 November 2022.

<sup>294</sup> The UK Soy Manifesto, November 2021, available at <https://www.uksoymanifesto.uk/>, accessed on 15 September 2022.

<sup>295</sup> The Accountability Framework Initiative (AFi) includes specific guidance on:

'Respecting the rights of Indigenous People and local communities', available at <https://accountability-framework.org/operational-guidance/respecting-the-rights-of-indigenous-peoples-and-local-communities/>, accessed 20 November 2022.

'The right to Free and Prior informed Consent (FPIC)', available at <https://accountability-framework.org/operational-guidance/free-prior-and-informed-consent/>, accessed 20 November 2022.

'Remediation and access to remedy', available at <https://accountability-framework.org/operational-guidance/remediation-and-access-to-remedy/>, accessed 20 November 2022.

<sup>296</sup> UK Soy Manifesto signatory actions include: setting a 2025 deforestation-free commitment accompanied by an action plan, asking direct suppliers to adopt and cascade the same commitment, integrating their commitments into supplier contracts, publicly disclosing their progress, and encouraging a harmonised monitoring and reporting system.

<sup>297</sup> 2 Sisters Food Group, '2SFG soy sourcing policy', June 2022, available at <https://www.2sfg.com/PDF/how-we-work/2022/2SFG%20Soy%20policy%20June%202022.pdf>, accessed in July 2022;

2 Sisters Food Group, 'Soya Sourcing Policy, 2021, available at <https://www.2sfg.com/PDF/how-we-work/2021/2SFG%20Policy%20on%20soy%202021.pdf>, accessed on 25 May 2022.

<sup>298</sup> 2 Sisters states these to be and provides links for: Cefetra's CRS scheme (<https://certifiedsoya.com/crs/>), Cargill's Triple S scheme ([https://www.cargill.com/doc/1432181492104/triple-s-guidance-\(pdf\).pdf](https://www.cargill.com/doc/1432181492104/triple-s-guidance-(pdf).pdf)), and ADM v2 (ADM's 'Responsible Soybean Standard', Version 2)

([https://assets.adm.com/Sustainability/ADM-Sustainable-Soy-Standard\\_180911\\_120112.pdf](https://assets.adm.com/Sustainability/ADM-Sustainable-Soy-Standard_180911_120112.pdf)), accessed 20 November 2022.

<sup>299</sup> 2 September 2022 ADM response to a 26 August Global Witness letter detailing our findings.

<sup>300</sup> ADM, 'Responsible Soybean Standard, Version 2', available at [https://assets.adm.com/Sustainability/ADM-Sustainable-Soy-Standard\\_180911\\_120112.pdf](https://assets.adm.com/Sustainability/ADM-Sustainable-Soy-Standard_180911_120112.pdf), accessed 20 November 2022.

<sup>301</sup> Cefetra, 'Certified Responsible Soy (CRS) Normative Document', July 2018, available at [https://www.certifiedsoya.com/wp-content/uploads/2019/12/20180712-CRS\\_Normative-document.pdf](https://www.certifiedsoya.com/wp-content/uploads/2019/12/20180712-CRS_Normative-document.pdf), accessed 25 May 2022.

<sup>302</sup> 2 Sisters Food Group email responding to Global Witness research findings, 9 September 2022.

<sup>303</sup> The European Feed Manufacturers Association (FEFAC) 'Soy Sourcing Guidelines 2021' states 'FEFAC does not consider itself a party in determining the rules and guidance for the different chain of custody models' - see: FEFAC, 'Soy Sourcing Guidelines 2021', February 2021, available at <https://fefac.eu/wp-content/uploads/2021/02/FEFAC-Soy-Sourcing-Guidelines-2021-1.pdf>, accessed 20 November 2022.

By November 2021, thirteen of the schemes accepted when benchmarked against its 2021 Guidelines were mass balance schemes: See; Jane Byrne, in FeedNavigator, 'Three more schemes benchmarked against FEFAC soy sourcing guidelines', 10 November 2021, available at <https://www.feednavigator.com/Article/2021/11/10/Three-more-schemes-benchmarked-against-FEFAC-soy-sourcing-guidelines>, accessed on 21 September 2022.

<sup>304</sup> Email from Nando's, 19 September 2022.

<sup>305</sup> Email from KFC, 9 September 2022.

<sup>306</sup> French Soy Manifesto, 'Mobilising French stakeholders to fight imported deforestation linked to soybean', 18 November 2020, available in English at <https://www.earthworm.org/uploads/files/210202-French-stakeholders-manifesto-to-fight-imported-deforestation-linked-to-soybean.pdf>, accessed in June 2022 and on 22 September 2022.

<sup>307</sup> Aldi Nord, Aldi Sud, Kaufland, EDEKA, Lidl, METRO, & REWE, 'Declaration: German market industry and retail players call out soy traders operating in Brazil to reaffirm their commitment to zero deforestation and conversion at landscape level in the Cerrado', undated, available at <https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Cerrado-Soja-Positionspapier-Lebensmittelhandel-Deutschland.pdf>, accessed 20 November 2022.

<sup>308</sup> Deutsche Umwelthilfe, Markt-Check Soja: Tun Supermärkte genug, um Entwaldungen für Sojafuttermittel in den Lieferketten ihrer tierischen Produkte zu verhindern?', July 2021, available at

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[https://www.duh.de/fileadmin/user\\_upload/download/P/rojektinformation/Naturschutz/Markt-Check\\_Soja/Markt-Check\\_Soja.pdf](https://www.duh.de/fileadmin/user_upload/download/P/rojektinformation/Naturschutz/Markt-Check_Soja/Markt-Check_Soja.pdf), accessed in June 2022, and on 22 September 2022.

<sup>309</sup> Responses from DLG and Danish Agro did not refute this assessment in their responses to Global Witness' research findings.

<sup>310</sup> 8 September email from Danish Crown in response to a 26 August letter from Global Witness detailing our research findings.

<sup>311</sup> Danish Crown, 'Inquiry from Global Witness regarding sourced soy', 6 September 2022, made available to Global Witness on 19 September by the German retailer Kaufland.

<sup>312</sup> European Commission Directorate-General for Environment, 'COM(2021) - Proposal for a regulation on deforestation-free products', 17 November 2021, available at [https://environment.ec.europa.eu/publications/proposal-regulation-deforestation-free-products\\_en](https://environment.ec.europa.eu/publications/proposal-regulation-deforestation-free-products_en), accessed 20 November 2022.

<sup>313</sup> See, for example Amendments 41, 46, 53, 56, 100, and others, in: European Parliament, 'Amendments adopted by the European Parliament on 13 September 2022 on the proposal for a regulation of the European Parliament and of the Council on making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (COM(2021)0706 – C9-0430/2021 – 2021/0366(COD))', 13 September 2022, available at [https://www.europarl.europa.eu/doceo/document/TA-9-2022-0311\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2022-0311_EN.pdf), accessed on 27 September 2022.

<sup>314</sup> European Commission, 'COM(2022) 71 - Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937', 23 February 2022, available at [https://ec.europa.eu/info/publications/proposal-directive-corporate-sustainable-due-diligence-and-annex\\_en](https://ec.europa.eu/info/publications/proposal-directive-corporate-sustainable-due-diligence-and-annex_en), accessed 20 November 2022.

<sup>315</sup> Article 3(e) and (f) of European Commission, 'COM/2022/71', define 'business relationship' and 'established business relationship' respectively, and entities on which regulated companies must conduct due diligence must meet the definitions of both. Under these definitions, commodity traders would only be responsible for conducting due diligence on the farmers they buy soy from if: 1. they have a commercial agreement with or finance the farmer, or; 2. farmers perform operations 'for or on behalf of' the traders, and; 3. the relationship must be, or is expected to be 'lasting, in view of its intensity or duration', and; 4. the farmer does not represent a 'negligible or merely ancillary part of the value chain' of the trader. It is highly likely that many farmers will not be deemed as meeting these definitions, thereby removing

the obligation for traders to do due diligence on their operations or be liable for harms they cause – either administratively or under civil litigation.

<sup>316</sup> Article 7, paragraphs 2 (a) and (b) and 3, 4, and 5, of European Commission 'COM/2022/71', accessed 20 November 2022.

<sup>317</sup> See the definitions in European Commission 'COM/2022/71' of 'independent third-party verification' and 'industry initiative' in Article 3 (h) and (j) respectively.

<sup>318</sup> Corporate Justice Coalition, 'A New Law to Prevent Abuse: Campaign Statement', 10 April 2019, available at [https://corporatejusticecoalition.org/wp-content/uploads/2019/04/190409\\_UK-mHRDD-campaign-statement\\_FINAL-with-logos.pdf](https://corporatejusticecoalition.org/wp-content/uploads/2019/04/190409_UK-mHRDD-campaign-statement_FINAL-with-logos.pdf), accessed 20 November 2022.

<sup>319</sup> Gina Gambetta, in Responsible Investor, 'Major investors call on UK to implement due diligence legislation', 31 August 2022, available at <https://www.responsible-investor.com/major-investors-call-on-uk-government-to-implement-due-diligence-legislation/>, accessed 20 November 2022.

<sup>320</sup> Results of YouGov / CJC Survey (18th - 19th August 2022) commissioned by Anti-Slavery International and Corporate Justice Coalition, available at, [https://www.antislavery.org/wp-content/uploads/2022/08/CorporateJusticeCoalition\\_Results\\_220819.pdf](https://www.antislavery.org/wp-content/uploads/2022/08/CorporateJusticeCoalition_Results_220819.pdf), accessed 20 November 2022.

<sup>321</sup> United Kingdom Parliament, Schedule 17 of UK Environment Act 2021, available at <https://www.legislation.gov.uk/ukpga/2021/30/schedule/17/enacted>, accessed 20 November 2022.

<sup>322</sup> Unearthed, 'Soya giants lobbied against deforestation rules during COP26', 4 March 2022, available at <https://unearthed.greenpeace.org/2022/03/04/eu-deforestation-lobbying-cop26/>, accessed 19 September 2022.

<sup>323</sup> Fediol, 'Members of the Executive Board', available at <https://www.fediol.eu/web/members%20of%20the%20executive%20board/1011306087/list1187970091/f1.html>, accessed on 14 September 2022.

<sup>324</sup> Coceral list of President and Vice Presidents, <http://www.coceral.com/web/philippe%20mitko%20%E2%80%93%20president/1011306087/list1187970223/f1.html>; and Coceral list of Corporate Board Members, available at <http://www.coceral.com/web/the%20board/1011306087/list1187970222/f1.html>, both accessed on 14 September 2022

<sup>325</sup> FEFAC Board members, as of September 2022, available at <https://fefac.eu/about-us/fefac-board/>, accessed 20 November 2022.

FEFAC Press Release, (undated), 'Asbjørn Børsting elected new FEFAC President at 65th General Assembly', available at <https://fefac.eu/newsroom/news/press-release->

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asbjorn-borsting-elected-new-fefac-president-at-65th-general-assembly/, accessed 20 November 2022.

All About Feed, 'Asbjørn Børsting elected as new FEFAC President', 8 June 2020, available at <https://www.allaboutfeed.net/home/asbjorn-borsting-elected-as-new-fefac-president/>, accessed 20 November 2022.

DAKOFO, Secretariat, available at <https://www.dakofu.dk/om-os/sekretariatet/>, accessed 20 November 2022.

<sup>326</sup> DAKOFO, list of Board Members, available at <https://www.dakofu.dk/om-os/bestyrelsen/> accessed on 14 September 2022.

<sup>327</sup> Bunge letter responding to Global Witness research findings, 13 September 2022.

<sup>328</sup> See, for example Amendments 123, in: European Parliament, 'Amendments adopted by the European

Parliament on 13 September 2022 on the proposal for a regulation of the European Parliament and of the Council on making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (COM(2021)0706 – C9-0430/2021 – 2021/0366(COD))' 13 September 2022, available at [https://www.europarl.europa.eu/doceo/document/TA-9-2022-0311\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2022-0311_EN.pdf), accessed on 27 September 2022.

<sup>329</sup> Coceral, Fediol & FEFAC, 'Joint COCERAL, FEDIOL, and FEFAC Reaction to the European Parliament vote on the Deforestation Regulation', 13 September 2022, available at <https://fefac.eu/newsroom/news/joint-coceral-fediol-and-fefac-reaction-to-the-european-parliament-vote-on-the-deforestation-regulation/>, accessed on 14 September 2022.