5 December 2022

To: CEOs of ADM, Bunge, Cargill, Louis Dreyfus and Viterra
CC: Christophe Hansen MEP, Rt Hon Thérèse Coffey MP and United Kingdom Secretary of State for the Department for Environment, Food and Rural Affairs; and US Senator Brian Schatz

Ref: Eliminating deforestation and conversion from soy production

Dear Juan Ricardo Luciano, Greg Heckman, David MacLennan, Michael Gelchie and David Mattiske,

The role of native vegetation and forests in maintaining our global climate is an undisputed lynchpin necessary to achieve the Paris Agreement and avoid the worst impacts of climate change. It was encouraging to see that for the first time in 2021 your businesses took the unprecedented step to work together to announce your commitment in Glasgow to “lay out a shared roadmap for enhanced supply chain action consistent with a 1.5 degrees Celsius pathway.” Over the past year we have seen some of you establish new commitments that move closer towards this goal, but with the release of the Agriculture Sector Roadmap in Sharm El Sheikh some substantial gaps remain.

Our loss of the Amazon, Cerrado and the Grand Chaco natural biomes to develop commercial agriculture continues to increase unabated (INPE, 2022). In just the last year we have seen deforestation rates in each reach new highs during a time when urgent action is needed to halt all forms of deforestation and conversion. It is disappointing to see that whilst these losses accelerate, your businesses have published a roadmap that is:

- Inadequate in its ability to present a clear message that all forms of deforestation and conversion must be urgently addressed by failing to establish an industry aligned cut-off date for the sector;
- Inconsistent with your existing company policies and sector work through the Soft Commodities Forum to define and prioritise action in the areas most at risk of continued ecosystem losses; and
- Insufficient to deliver on the goals of the 1.5°C ambitions we are all working towards by further delaying concrete action for at least another year.

These deficiencies in the roadmap have been articulated by both governments and civil society, yet they remain unaddressed by any new commitments or actions that meet the moment. As this is an area you have now shown that the market is unwilling to act upon voluntarily, we are now redoubling our call for a strong regulatory response by governments which incorporates a cut-off date for deforestation and conversion of January 2020 (2008 for the Amazon). Such legislation is already moving its way through the European Union, United Kingdom and United States and must be quickly adopted and promoted by all nations.

For our part, we wish to continue our work with you to find a viable path to quickly developing the core areas of the roadmap you have put forward:

1. **Scope alignment of your commitments** – The roadmap takes an important step in recognising that both direct and indirect supply chains need to be addressed in delivering a zero-deforestation ambition. However, an additional critical step is to ensure this does not occur regardless of legality towards 100% verified deforestation- and conversion-free soy by 2025 at the latest. Whilst some of you have already adopted commitments that are aligned with this scope, we would like to see the whole sector move immediately to this point.

2. **Risk assessment methods for identifying and acting on deforestation** – Your work with the Soft Commodities Forum has demonstrated that your businesses are deeply knowledgeable about identifying priority areas for addressing deforestation and conversion. It was surprising to see that although through that initiative you have identified 61 priority municipalities for action, the principles you used for identifying these have been discarded as almost none of these areas are included within your roadmap due to its limited focus on illegal deforestation only.
3. **Conversion definition being included within your actions** – The Accountability Framework initiative (AFi) has clearly provided this for several years and it articulates the consensus view of civil society on how terminology should be used. Several of your businesses reference its use within your own policies given that it is well known that most soy-related conversion occurs on the Cerrado savannahs.

4. **Building supply chain capacity to act** – There is much work to do with the full value chain in understanding what actions are needed, regardless of whether due diligence legislation is active. We can play our part by providing much needed training and support to businesses to understand what is needed to effectively deliver on these goals. For example, the Retail Soy Group is today launching a free e-learning resource for non-experts to quickly understand the challenges and opportunities for sustainable soy production.

5. **Financially supporting responsible producers** – There are ready made instruments available that incorporate the critical 2020 cut-off date for deforestation and land conversion that need to be rapidly scaled, such as the Responsible Commodities Facility and other payment for ecosystem services initiatives. Your businesses have committed tens of millions of pounds to establishing new schemes when the potential for these can be unlocked much faster. Retailers have already distributed $11m in initial funding to play our part in launching these new innovations and will welcome the support and scaling your businesses can further provide.

In short, we commend the efforts of your businesses to collaborate on the delivery of an aligned ambition. By acting swiftly to send a clear market signal, and supporting effective due diligence regulations to level the playing field for all market actors, we can together deliver on the change that is needed.

We would welcome the opportunity to hear more on how you will develop these efforts to ensure they are adequate and consistent with existing commitments, as well as to meet the urgent demand to align to a 1.5°C degree pathway.
Appendix: Agricultural Sector 1.5C Roadmap benchmark summary

The table below provides a comparison of the Agricultural Sector Roadmap published during COP27 and the corresponding commodity trader activity within their own company policies and actions as well as those of the collective working groups they are engaged in:

**Soft Commodities Forum**: Pre-competitive coalition of soy traders identifying and working in priority landscapes at risk of deforestation and conversion.

**FEFAC Soy Sourcing Guidelines**: European feed industry benchmark of standards that deliver, amongst other things, deforestation- and conversion-free soy.

<table>
<thead>
<tr>
<th></th>
<th>Agricultural Sector Roadmap</th>
<th>Accountability Framework Initiative (AFI)</th>
<th>Soft Commodities Forum</th>
<th>FEFAC Soy Sourcing Guidelines</th>
<th>Trader Policies and Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Boundary of commitment</strong></td>
<td>Illegal deforestation only</td>
<td>All forms of deforestation and conversion</td>
<td>Aligned with AFI</td>
<td>Optional criteria for alignment with AFI</td>
<td>Aligned with AFI, Aligned with AFI, Aligned with AFI, Aligned with AFI, Illegal deforestation only</td>
</tr>
<tr>
<td><strong>Definition of conversion</strong></td>
<td>To be developed</td>
<td>Change of a natural ecosystem to another land use or profound change in a natural ecosystem’s species composition, structure, or function.</td>
<td>Aligned with AFI definition</td>
<td>Aligned with AFI definition</td>
<td>Loss of native vegetation, Loss of native vegetation, Loss of native vegetation, Loss of native vegetation, Loss of native vegetation</td>
</tr>
<tr>
<td><strong>Criteria within own trader certification schemes aligned with AFI criteria on cut-off dates and conversion</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Yes, Yes, Yes, Yes, Yes, In development</td>
</tr>
</tbody>
</table>