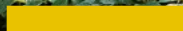




Activity Report 2024 and 2025

From policy to implementation



Moving forward

The Retail Soy Group has provided a space for global retailers to work together in a pre-competitive environment to increase their capability to ensure the products they sell are linked to soy that has been responsibly produced. For the last six years our efforts have been primarily focused on addressing deforestation in South America through approaches that seek to deliver verifiable supply chains without leaving producers behind.

This report provides an overview of our key activities and outputs that have contributed towards our shared group ambition over 2024 and 2025.



Promote verification

Supply chain engagement has become more evidence-led and operational, while recognising the limits of managing indirect supply.

Focus on action

Credibility depends on clearer sourcing expectations, enforceable supplier requirements, better visibility, and more disciplined reporting.

Drive consistency

Supply chains are shifting from dialogue to proof: fewer new aspirations, more aligned use of common tools and clearer evidence of progress.

Key group contributions and collaborations

- ➔ Contributed to **Accountability Framework initiative [operational guidelines](#)** (published December 2025) on commitments and progress pathways.
- ➔ Co-authored publicly accessible **[model deforestation free contracting clauses and guidelines](#)** for businesses to incorporate into their procurement contracts.
- ➔ Provided **case study and guidance recommendations for EU and UK policy makers** for creating more efficient and effective due diligence requirements in the EU Deforestation Regulation and Forest Risk Commodities legislation
- ➔ Organised **[public CEO-level engagement](#)** across the food sector for **retaining forest protections** in Brazilian law and the continuation of the 2008 cut-off date for land use change embodied in the Amazon Soy Moratorium.
- ➔ Supported the development of a **global deforestation and conversion free procurement standard** that includes embedded soy with BSI.
- ➔ Developed a **DCF sourcing hierarchy** based on the availability of materials and evidence in different supply chains.



About us

The Retail Soy Group (RSG) was formed in 2013 to address a sector-wide gap in addressing demand for sustainably produced soya.

It is an independent group of international retailers working collaboratively to find industry-wide solutions for soy for their animal feed and human food supply chains.

Facilitated by



Members



We are **committed** to sourcing and buying soy responsibly



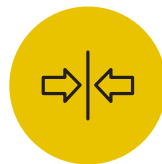
Why the Retail Soy Group matters

Our value lies in making retailer action more coherent, credible and practical.

Retailers cannot solve deforestation and conversion risk alone. By working together in a pre-competitive space to use our collective influence carefully, we can raise the quality of supplier engagement and reduce inconsistent market signals.

Over 2024 and 2025, our role increasingly centred on three functions:

- 1. Clarifying** what credible responsible soy sourcing requires;
- 2. Translating** that into tools and expectations that members can use; and
- 3. Connecting** retailer action to the wider initiatives, standards and accountability mechanisms needed for system-level change.



Align

Create common expectations and reduce contradictory asks to suppliers.



Enable

Develop practical tools that can be used in procurement, reporting and supplier conversations.



Influence

Engage with initiatives and upstream actors where retailer expectations need to be heard.





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- 05 Outlook for 2026** The priorities that now matter most for implementation and credibility.



01

A changing world

Moving from voluntary commitments towards due diligence, traceability and stronger evidence expectations.

RSG member Ahold Delhaize and Will Schreiber at the RTRS International Conference (Ghent)



A transition from commitments to evidence

The last five years has been dominated by focusing on policy commitments, certification uptake, and participation in voluntary initiatives. With progress in supply chains largely plateauing in 2024, it is now clear that reliance on these mechanisms alone will not deliver on our ultimate goal of making sustainable soy the market norm.

Retailers need to understand not only whether sustainable soy production is occurring in producing nations, but also how claims can be substantiated across their indirect supply chains. This shift is driven by regulation, NGO scrutiny, and continued concern about deforestation and conversion risk in production landscapes.

Key contributions of the RSG:

- **Credibility** in alignment on the definitions of responsible soy
- **Clarity** on evidence expectations articulated to supply chains
- **Alignment** with retailers, suppliers, feed businesses, traders and standards systems.

Thematic observations

We are operating in a sector that is becoming more demanding and less tolerant of unsupported claims.



Regulation sets the frame

EUDR and UK Forest Risk Commodities are now the dominant reference points, even where timing, scope and guidance were uncertain.



Evidence is now the test

Procurement controls, monitoring, traceability, supplier declarations, low-risk sourcing and certification routes are increasingly treated as different forms of evidence, not interchangeable proof.



Trader accountability

Retailers are placing greater emphasis on soy trader performance, grievance systems, control points and the role they can have in upstream purchasing decisions.



Producer incentives matter

Producer finance, landscape approaches and mechanisms, such as the Responsible Commodities Facility, are more prominent since exclusion alone is unlikely to deliver durable conservation outcomes.



Embedded soy remains difficult

Livestock and feed supply chains remain a structural challenge: indirect exposure, limited visibility and mixed supplier capability continued to slow the pace of delivery of retailer ambitions as their ability to control sourcing is constrained.



Public claims are riskier

The gap between aspiration, sourcing route and verified outcomes is now a communications risk at time as green claims scrutiny from regulators in Europe and the UK increases.



02

**2024
Readiness**

A year of understanding regulation, defining credible evidence and testing the commercial implications of responsible soy delivery.

Building the foundations for credible delivery

In 2024 our work was defined by practical preparation for a more demanding due-diligence environment.

With the adoption of the EU Deforestation Regulation (EUDR) in 2023, retailers and their supply chains became focused on moving procurement policies and practices from voluntary supplier expectations to minimum legal requirements. As a group we examined the implications of the EUDR and the draft UK Forest Risk Commodities regimes, considered how those requirements might apply to embedded soy in livestock supply chains, and worked through the kinds of evidence retailers would need to make responsible sourcing claims with confidence.

By the end of 2024, our work became focused on what proof, control and collaboration would actually be required to deliver a responsible soy supply chain that promoted effective due diligence up and down the value chain.



Joe James (Sainsbury's) speaking at London Climate Action Week on the importance of incentivizing landscape conservation with soy producers through finance.

Key areas of focus in 2024

We concentrated on developing a realistic basis for judging what credible retail progress on transforming supply chains requires. Our activities included:

Regulatory readiness

Provided comparisons and alignment with EUDR and UK FRC expectations. Challenges and inconsistencies were shared with respective policy makers to inform guidance and FAQ materials that were later published.

Standards and assurance

Engaged with RTRS, Donau Soja, Proterra, and sector initiatives to understand where certification, chain of custody and verification can and cannot carry claims.

Evidence quality

Explored what members would need to distinguish credible deforestation and conversion-free claims from weaker indicators that could not be substantiated.

Retailer alignment

Built a shared view of the questions that retailers need to make of suppliers, manufacturers, feed businesses and traders.

Transition feasibility

Considered risk-sharing and the practical limits of influencing supplier and feed-sector systems.

Theory of change

Started to frame delivery as a combination of sourcing routes, supplier controls, traceability, monitoring, reporting and verification (MRV), and incentives rather than a single solution.



The foundations mattered because they changed the conversation

We helped members move from broad ambition to a more disciplined view of delivery.

Our work reduced the risk of retailers making misleading or innaccurate claims of progress. Understanding the causes and potential solutions established a basis for a more mature discussion with suppliers: not simply asking for responsible soy, but asking for the route, the evidence, the controls, and the plan for improvement.

The most important 2024 shift was the recognition that responsible soy sourcing cannot be treated as a binary policy claim. It requires a hierarchy of evidence and a clear understanding of what each route can credibly demonstrate.

Our approach

Voluntary ambition has to be translated into evidence thresholds and supplier expectations.

Our Tactics

Members need practical language, claim routes, sourcing hierarchies and evidence tests.

Our Plan

The post-2025 agenda will prioritise consistent implementation, not new layers of aspiration.



03

**2025
Recalibration**

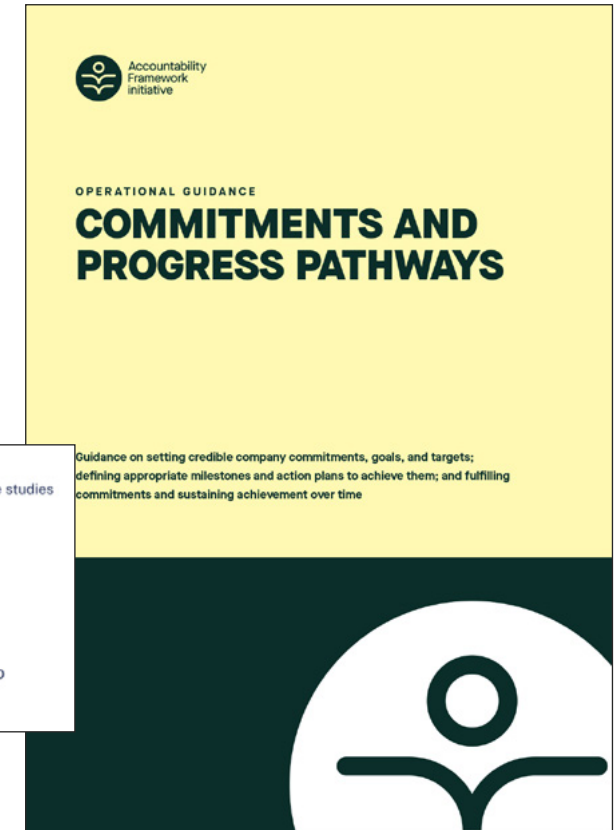
Shaping a practical approach for after a milestone year.

Recalibration and the post-2025 operating model

Moving to more consistent implementation throughout the value chain.

In 2025, we recognised that the level of collective market change sought by retailers had not yet been delivered at the scale or pace implied by earlier ambitions. That matters because credibility depends on being clear about the difference between progress in alignment and verified transformation on the ground.

The retailer response has not been to weaken ambition, but rather to make the operating model more usable. Our work therefore placed greater emphasis on trader assessment, supplier communication and capacity building, providing sourcing hierarchies, and being bolder in how we communicate the role of feed businesses and manufacturers.



RSG Representative Will Schreiber contributed to the development of critical implementation resources for supply chains: operational guidelines for delivering on commitments, and model contracts and guidelines for locking in supplier requirements to deliver deforestation free products.

Key areas of focus in 2025

Our emphasis centred on building tools and alignment for implementation.

Trader assessment

Standardised research and outputs to promote a more efficient understanding of the progress and priorities of indirect supply chain engagement.

Feed and livestock focus

Continued engagement on the practical difficulties of embedded soy, including visibility, responsibility, and feed-sector capability.

Supplier requirements

Development of aligned expectations, policy language and practical routes for engaging suppliers more consistently (e.g. with Accountability Framework initiative)

External initiatives

Engagement with other groups, standards and finance mechanisms that influence the conditions for responsible soy production and delivery.

Material verification hierarchy

Distinguished sourcing routes and evidence types, helping members and suppliers understand what carries stronger credibility.

Public communication

More attention to consistent claims, avoiding overstatement, and managing the risks associated with uneven evidence quality.



RSG Representative Will Schreiber at the Non-GM soy conference (Frankfurt)



RSG engagement visit to Bunge (Amsterdam)

Transitioning engagement models

Our focus has shifted from being solely a time-bound ambition to having a practical delivery route. This route combines common language, defined sourcing pathways, supplier expectations, evidence standards, trader engagement, monitoring, and external collaboration.

Retailer credibility will depend on applying a smaller number of robust tools consistently.



04

What we learned

We've achieved real progress in alignment and system design and remain aware of the limits of current evidence and retailer leverage.

We moved from commitment-led to evidence-led action

At the start of 2024, the focus of retailers, and the whole supply chain, was to understand how the EUDR and due diligence expectations might apply to retailer supply chains. By the end of the 2025, the ambiguity has largely gone away to clear the runway for action.

FROM

- Commitments and targets
- Certification-led language
- General supplier asks
- Limited comparability
- Public claims with uneven evidence

TO

- Evidence thresholds
- Defined sourcing routes
- Structured supplier requirements
- Common language and hierarchy
- More disciplined communication



RSG Representative Will Schreiber and Viv Harris (M&S) with WWF Brazil (Brasilia)

We still have some work to do building toolkit



A more mature evidence standard

Self-declarations, certification, low-risk origin sourcing and EUDR-aligned routes are different evidence types and should not be treated as equivalent.

A clearer path for supplier engagement

Model policy language, supplier segmentation and a material sourcing hierarchy can provide a more practical basis for consistent member action.

Common definitions and language

General language such as 'mass balance' and 'low risk' are not being used consistently across the supply chain or with stakeholders. The principles themselves remain contested and authoritative sources are needed to be consistently used.

Greater realism about retailer leverage

Retailers can align asks and use procurement influence, but they cannot create back to farm traceability or producer incentives alone.

Constructive external engagement

We must maintain connections with wider initiatives and accountability frameworks, reinforcing that credible delivery depends on norms, contracts, finance and assurance working together.

Active procurement controls

We need to be able to ensure the whole supply chain has the tools they need to spot policy short falls, or supplier non-compliance, so that they can engage and act to mitigate such occurrences from occurring.

What remains difficult

The whole value chain needs to be more honest about constraints.

Evidence gaps

Full verification remains uneven, and some sourcing claims still depend on proxy evidence or partial visibility.

Regulatory uncertainty

Due diligence legislation is influencing member thinking, but changes in timing, guidance and interpretation have introduced planning uncertainty.

Supply-chain complexity

Embedded soy in livestock products remains hard to trace, especially where feed, manufacturing and retailer systems do not yet align.

Claim discipline

There remains a risk of overstating progress if terms such as “DCF” or “low-risk” are not used consistently.

Supplier capability

Implementation will vary by supplier readiness, geography, category and degree of leverage.

Producer incentives

Long-term outcomes need meaningful incentives for producers. Exclusionary purchasing requirements alone may not be sustainable in the long term.





05



Outlook for 2026

We enter the year with a sharper task

Implementation, transparency and disciplined evidence



1. Align common policy terminology

Create a controlled vocabulary for DCF, low-risk sourcing, EUDR-aligned routes, mass balance, and trader control systems.

2. Embed supplier requirements

Use model policy language and sourcing material hierarchies in procurement, engagement and non-conformance management.

3. Strengthen monitoring and reporting

Track a smaller number of robust indicators with the companies that are best positioned to drive change, including sourcing route, supply-chain visibility, evidence quality and supplier coverage.

4. Maintain upstream accountability

Continue focus on traders, feed businesses and producer incentives so retailer action is connected to the actors who control risk.



Improving indicators can improve accountability



Coverage

Focusing actions based on category, geography and materiality.



Sourcing route

Volumes or exposure by sourcing route and confidence level.



Evidence quality

Degree of verification, assurance or reliance on proxy evidence.



Engagement

Supplier uptake, policy alignment, escalation, and improvement plans.



Accountability

Trader engagement, grievance response and corrective action.



Positive action

Producer-support, landscape or finance mechanisms connected to member sourcing.

The point is not to create a burdensome reporting system. It is to distinguish real implementation from process activity and to make claims proportionate to the evidence available.

The work ahead



We enter 2026 with a clearer understanding of what credible delivery requires. The retailer task is now to embed that understanding in supplier engagement and public reporting.

The wider conditions will remain challenging. Regulatory uncertainty, uneven supply-chain capability and continuing pressure on high-risk landscapes will not disappear.

Our contribution is to help members act with consistency, maintain pressure where retailer leverage is meaningful, and support solutions that connect responsible sourcing with producer incentives and credible landscape outcomes.

The measure of success in 2026 should be whether responsible soy expectations become easier to apply, easier to evidence and harder to misstate.

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