



Deforestation meat on your plate

How Brazilian beef linked to deforestation is sold by catering wholesalers and supermarkets in The Netherlands

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About World Animal Protection

World Animal Protection is an international animal protection organization with twelve offices around the world. Our mission is to create a better world for animals. Animals are sentient, therefore we must treat animals consciously. Animal suffering cannot be justified.

Our work is particularly focused on wildlife and the food system. Industrial livestock farming not only causes massive suffering for the animals trapped in it, but also has huge negative impacts on wildlife habitat. It leads to deforestation, pesticide pollution and manure surpluses, and is a major contributor to climate change that is also disastrous for many animals.

About AidEnvironment

AidEnvironment is a nonprofit sustainability research, strategy and implementation organization based in the Netherlands, Indonesia and Uganda. AidEnvironment supports governments, businesses, civil society organizations and the financial sector with data and analysis to eliminate resource-induced deforestation.

About the report

This report was written based on research conducted by AidEnvironment. It zooms in on beef products in Dutch wholesalers and supermarkets that can be linked to deforestation.

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Photo: Cattle graze in the outlying areas of Rio Branco, Acre in Brazil in the state of Acre. Credit: World Animal Protection/ Noelly Castro

Foreword

Introduction: How wild animals disappear

A high-pitched howl cuts through your soul. It comes from an ocelot, a feline more than a meter long that stands high on its legs. Or rather, limps, because this magnificent animal can no longer walk properly. With a broken leg and a body full of hail, it was brought here and patched up - at this shelter cum small zoo in Pará state in the Brazilian Amazon.

The story of the ocelot is, with slight variations, the story of most of the animals here. The rainforest where these wild animals have their home is disappearing little by little. That means they get out of the forest - and then get shot or hit or languish. In some cases, they are captured to serve as exotic pets.

A jaguar is another example. As a cub, it came out of the jungle with its mother because their home had become too small to live. Its mother was shot, the cub was captured. But when he grew too big and too difficult to keep, he was brought here. Although his enclosure is fairly spacious, the sight is depressing. This beautiful animal is condemned to a life in captivity, for release back into the wild is most likely not possible. The animal has not learned to take care of itself.

In 2022 I visited this shelter that mops while the tap is open. With my own eyes I saw the ongoing process that destroys the rainforest. This includes not only the Amazon, but also the precious nature of the Cerrado, the Pantanal, the Gran Chaco and the Atlantic forest. Hectare by hectare, wildlife habitat is disappearing or becoming

fragmented and intersected with roads that kill countless animals. It is disastrous for animal welfare, but also exacerbates the biodiversity and climate crisis. There are several drivers of deforestation in South America, but they are all dwarfed by the number one: beef production.

With the help of companies, that deforestation meat also appears on Dutch plates: cattle companies, slaughterhouses, traders and retailers - and the financial institutions that finance and insure them or hold their shares. This report shows the links of that chain. It should be seen in light of new European regulation requiring companies to exclude meat that risks being linked to deforestation. Not only does it show that companies still have work to do to come into line with the new legislation, but also, and just as importantly, that this is not enough: the legislation by no means covers all ecosystems and companies have a social responsibility to preserve those too. May this report help in the fight for the conservation of forests, forest savannas and other important ecosystems - and for the preservation and welfare of the animals that have their home in them.



Dirk-Jan Verdonk

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Beef production is the main driver of deforestation in the Amazon, the unique habitat of thousands of animal species and one of the nine tipping points of the global climate. Other important ecosystems in Brazil are also being destroyed for beef production, including the Cerrado, Pantanal and Atlantic forest. Brazil is the largest exporter of beef and the site of the very largest (beef) meat company in the world: JBS. This raises the question of whether Brazilian beef for sale in the Netherlands can be linked to deforestation in Brazil. Research by AidEnvironment commissioned by World Animal Protection shows that the answer is yes. Moreover, companies in the Netherlands appear to be using a loophole to avoid having to state the country of origin of the meat. Partly because of this, it is often impossible to guarantee that the beef is deforestation-free. Consumers are left in the dark about the origin of the beef they buy or get served.

Background

The link between beef production and deforestation in the Amazon and other natural areas has been known for decades. For example, beef production in the so-called "legal" Amazon has increased tenfold over the past forty years and today accounts for some forty percent of Brazil's total beef production, which includes over 200 million cattle.¹ In most cases, land is cleared through deforestation for cattle to graze, but an increasing proportion of cattle are fattened in so-called "feedlots" where the animals are fed soy and corn, crops that also cause deforestation.²

In 2009, four major Brazilian beef companies announced a moratorium on buying cattle from newly deforested land in the Amazon. They did not live up to this. Moreover, in 2014, governments and major companies endorsed the New York Declaration on Forests. In the declaration, companies committed to ending deforestation for the production of agricultural commodities, including beef products, by 2020. The companies failed to meet this target. The Consumer Goods Forum's 2020 deadline for net zero deforestation was also not met.³

After these failures to become deforestation-free, legislation was passed in the European Union. On June 29, 2023, the EU regulation on deforestation-free products came into effect. From that time, (large) companies have 18 months to ensure that they only import or sell beef products in which there is no or only negligible risk that they were created through deforestation. In doing so, the cut-off date for deforestation is December 31, 2020. Land that has been or will be deforested after that date is

in violation of European legislation, land deforested before that date is not covered by the legislation.

Moreover, the regulation contains a geographical restriction: it is based on the Food and Agriculture Organization of the United Nations (FAO) definition of "forest" and excludes (for now) other wooded land.⁴ This is troubling because it could lead to so-called "deforestation leakage," that is, deforestation moving into less protected ecosystems.⁵ This is a particular concern for the Cerrado and Pantanal, unique natural areas of which only a small percentage are covered by the new regulation, but which are under great pressure from expansion of meat production.⁶

From the end of 2024, companies must have implemented due diligence systems in terms of information requirements, risk assessment and risk mitigation measures, complemented by reporting obligations, to ensure deforestation-free beef. But even now, companies are already bound by labeling obligations that have been in place since the beginning of this century.

A major reason why it is so difficult to ensure that beef is deforestation-free is so-called "cattle laundering". This illegal activity involves falsifying information to disguise the true origin of the cattle and hide ties to deforested areas. Suppliers guilty of deforestation alter documentation or transport animals to suppliers without deforestation before final sale to a slaughterhouse.⁷



Photo: Credit: Alf Ribeiro / Shutterstock

Brazilian beef imports

About a fifth of Brazil's total beef production is for export. Research published in 2020 found that 48.1% of exports came from cattle in the Cerrado, 25.5% from the Amazon, 18.2% from the Atlantic forest, 5.0% from the pampas and 1.9% from the Pantanal and Caatinga.⁸

The Netherlands imports large quantities of beef from Brazil. In 2022, the Netherlands imported 6,930 tons of fresh or chilled beef from Brazil. In the same year, it also imported 6,655 tons of frozen beef. On top of that, 2,981 tons of prepared or preserved beef was imported from Brazil, bringing the total to 16,566 tons.⁹

Cargo data of Brazilian beef exports from June 1, 2022 to May 31, 2023 to the Netherlands show that JBS is the largest exporting company, accounting for 45% of trade to the Netherlands alone. Marfrig (30%) and Minerva (14%) are number two and three. The remaining eight exporting companies

collectively accounted for 12% of trade with the Netherlands.¹⁰ Largest importer of Brazilian beef is also JBS, which is also based in the Netherlands. So the same company -JBS- is both importer and exporter, which means they have control and are culpable. JBS- imported 64% of the beef products in the Netherlands exported by JBS in Brazil during the same period, followed by LSI-Netherlands (Jack Link's) with a 15% share, and FN Global Meat (5%).

Research published in 2020 showed that at least 17% of overall beef exports from the Amazon and Cerrado to the EU may have been contaminated by illegal deforestation. On top of that is the percentage of beef that may have come about through legal deforestation.¹¹



JBS is the largest meat company in the world. It has a slaughter capacity of 75,000 cattle, 115,000 pigs, 16,000 sheep and 14 million chickens *per day*. This gives the company a giant climate footprint, larger than that of the country of Spain.¹² JBS grew from a small slaughterhouse operation in 1953, processing five cattle per day, to the multi-billion dollar company that it is today, largely thanks to capital injections from Brazilian development bank BNDES.¹³ In 2016, it came to light that the company had bribed more than 1,800 politicians over the years. The total amount of bribes JBS had handed out was around \$150 million.¹⁴ The owners of JBS, the Batista brothers, were also later convicted of insider trading. Corruption is not the only issue that puts JBS in the news. The company is regularly accused of deforestation, violation of land rights and even indirectly with violence against traditional communities.¹⁵

For years, JBS has failed to guarantee that the company's beef is deforestation-free.¹⁶ In 2020, it was conservatively estimated that JBS's total deforestation footprint could be 200,000 acres in the direct supply chain and as much as 1.5 million acres in the indirect supply chain.¹⁷ In the same year, it came out that JBS's former auditor, DNV-GL, hired by JBS to audit the supply chain between 2017 and 2019, never audited JBS's indirect suppliers in Brazil. As opposed to what JBS suggested, "DNV GL's assessment report could not [...] be used as evidence of good practices throughout the supply chain."¹⁸

In 2022, JBS had to admit that it had bought nearly 9,000 cattle from a criminal cattle breeder whom prosecutors identified as "one of the biggest deforesters in Brazil."¹⁹ Soy in JBS's chain is also linked to legal and illegal deforestation, as investigations in the same year revealed.²⁰

In 2023, JBS was taken to task by the National Advertising Review Board, who upheld an earlier decision by the National Advertising Division over the company's claims that it would be climate neutral by 2040.²¹ Shortly thereafter, [international media](#) reported that JBS wants to raise money with an Initial Public Offering (IPO) in the United States to continue its growth. As part of this IPO, JBS intends to [establish a new holding company \(ultimate holding company\) in the Netherlands](#).

In November 2023, eight NGOs in France filed a criminal complaint against several French banks for financing meat companies - notably JBS and Marfrig - that promote deforestation in Brazil.²²



Marfrig is the second largest meat producer in Brazil after JBS. The company has plants in 22 countries and exports to more than 100 countries. The total company has a slaughter capacity of 31,000 cattle, 10,000 pigs, 10,000 sheep and 4 million chickens per day.



Minerva is one of the dominant companies in South American beef exports. The company exports to more than 100 countries. The company plans to increase its slaughter capacity to over 42,000 animals per day by 2023, up from the current figure of nearly 30,000 by buying parts of Marfrig.²³

Research methodology

AidEnvironment and World Animal Protection registered labels of beef products at Dutch branches of wholesalers (Makro, Sligro and Hanos) and supermarkets (Albert Heijn, Lidl, Jumbo, Dekamarkt, Dirk, Aldi, Vomar and Plus). This was done in the summer of 2023. The supply chain of a selection of these products was then mapped, down to the level of Brazilian cattle farming. Seven cases of these are detailed in the appendix of this report, where a case may involve multiple products.

For mapping, a large (and growing) database of direct and indirect suppliers of Brazilian slaughterhouses developed in recent years by AidEnvironment based on: (1) national land registry data (SIGEF and SNCI), (2) data from the Brazilian Ministry of Agriculture, and (3) livestock transportation permits (so-called GTA data). Thus, the database contains 11,598 direct and 21,315 indirect suppliers of cattle to the slaughterhouses of JBS. Incidentally, this is still a subset of all JBS's direct and indirect suppliers. The company alone has an estimated 50,000 direct suppliers. The study is therefore not aimed at obtaining a complete picture, but rather at demonstrating that (potential) deforestation meat is offered in the Netherlands.

Note further that for the Brazilian states of São Paulo (SP) and Rio Grande do Sul (RS), there is no publicly available access to GTA

data. Also, GTA data in many states are limited to 2018/2019. More updated information (until 2023) is available especially for the states of Pará and Goiás. Incidentally, many livestock producers have relatively stable relationships with their buyers, meaning that major shifts in the supply chain are unlikely. For this reason, the burden of proof on recent changes in relationships with suppliers lies with the buyers.

The so-called Federal Inspection Service code ("SIF") consisting of three or four digits, refers to a specific slaughterhouse in Brazil. If this code is indicated on the label, the slaughterhouse origin of the meat can be proven very precisely.

Because suppliers supply multiple slaughterhouses and slaughterhouses purchase their slaughter cattle from multiple suppliers (who in turn often have multiple direct and indirect suppliers), individual cattle cannot be traced to specific beef products. We investigated whether slaughterhouses that received cattle from direct and indirect suppliers with deforestation on their farms supplied the Dutch market. If so, then there is (potential) deforestation meat. After all, it is the responsibility of companies operating in the Netherlands to rule out buying and selling deforestation meat.

Photo: Credit: PARALAXIS / Shutterstock



Labeling: a giant loophole

In 2000, an EU regulation came into effect to improve beef labeling. The background was the outbreaks of BSE. This "mad cow disease" can lead to the deadly Creutzfeldt-Jakob disease in humans. The scandal surrounding this disease highlighted a serious lack of transparency. The goal of the regulation was therefore to restore consumer confidence in beef and "not mislead them. To this end, as the regulation states, beef products must be "correctly and clearly labeled.

But what does that mean? The regulation seems clear. Operators and organizations marketing beef must include on the label information about the origin of the product, in particular where the animal or animals from which the beef was derived were born, fattened and slaughtered.²⁴ In addition, it explicitly states that, in the public interest, the compulsory beef labelling system also applies to beef imported from outside the EU. Such imported meat must be labelled "Origin: Non-EG" and "Place of slaughter: (name of third country)" (Part I, Article 15).

However, the further elaboration largely undermines this objective. For the indication of the country of origin is only mandatory for fresh beef. This opens a giant loophole. Because as soon as there is even minimal processing, the obligation to state the country of origin is removed. The addition of water or spices is sufficient for that.²⁵

For example, the examples mentioned in Case study G consist of 95% beef. But water has been added (a way to make more money with less meat), as have flavoring and salt. This qualifies it as "processed beef" and the country of origin need not be mentioned. The products in Case Study F are also processed products.

Thus, the current regulations seriously fail to inform buyers (e.g. restaurants or individual consumers) about the origin of the meat. It is impossible for them to find out where the meat comes from and whether it therefore has an increased risk of being linked to deforestation. Inquiries with sellers do not yield any results either. For this research, we contacted several large Dutch supermarkets to ask about the origin of the meat in beef jerky and BiFi sausages. We were referred to the producer by all of them. The response we received from the producer-Jack Link's-was as follows: "All of our products are sourced from countries and regions approved by the European Union and fully meet the stringent standards legislated by the European Parliament, including regulations addressing food safety, animal welfare, public health, and traceability." When we specifically asked if they then import meat from Brazil, we got no more response.

Only one conclusion is possible: the current labeling regulations do not adequately align with the new EU regulation on deforestation-free products.

Results

Survey results show:

1.

That beef is offered on the Dutch market coming from Brazilian slaughterhouses of the three largest Brazilian meat companies JBS, Marfrig and Minerva to which cattle have been supplied by direct or indirect suppliers on whose land deforestation has occurred since the end of 2020. This applies in particular to Makro.

Whether these providers are in violation of the obligations that will apply under the EU Regulation on deforestation-free products depends on whether the location of this deforestation falls within the FAO definition of "forest. The study indicates that this may be the case in some cases (cases C, D and E). However, other critical ecosystems that are less protected, such as the Brazilian Cerrado and Pantanal also experience deforestation linked to beef products from the study.

2.

That there is beef on sale on the Dutch market whose country of origin cannot be identified, which means that it cannot be ruled out that it is deforestation meat, nor that the risk of it is negligible.

In doing so, companies regularly use a loophole to avoid indicating on the packaging the country of origin of the meat contained in the product (see cases F and G).

3.

Companies do not always keep their promises. Following research published by Repórter Brasil and Mighty Earth, several retailers made promises by the end of 2021.

- Albert Heijn promised to stop offering "beef jerky" - a snack containing smoked meat - produced by JBS in collaboration with the American company Jack Link. However, the investigation shows that Jack Link's beef jerky is still widely available at Albert Heijn (see case study F).
- Lidl declared it would no longer sell beef from South American producers as of early 2022.²⁶ In the summer of 2023, investigators found beef ("Filete de Ternera") coming from Uruguay.

Moreover, Makro's parent company Metro AG (Germany) has a meat procurement policy that states that on beef, the company is taking steps "to work toward zero deforestation". In the sample, Makro emerged as the worst-performing company. It sells numerous beef products from Brazilian slaughterhouses to which direct and indirect suppliers supply that can be linked to deforestation (see cases A, B, D, G).

4.

Dutch providers do not provide transparency. Providers refer to the producer and the producer does not provide specific information or further evidence.²⁷

Opaque chains

The investigation shows that several Albert Heijn beef products do not have clear information on the labels about companies in the chain. There is only "Albert Heijn BV" on the label. The labels also provide no information about the origin of the meat, nor about where the cattle were raised and slaughtered. Via the EG number (NL-371-EG), it is nevertheless possible to find out that Hilton Foods Holland is the supplier of these products. This labeling violates the labeling law.

An employee of Hilton Foods Holland verbally told investigators on July 4, 2023 that "the beef products supplied by Hilton Foods to Albert Heijn have their origin in Europe or occasionally in South America, but it will never come from Brazil. The person also said he could only verbally guarantee this, "since there is no proof or information on the label or anything like that".

At the same time, cargo data shows that Hilton Food Solutions Holland BV buys fresh beef products coming from Brazil. Between January 1, 2021 and July 31, 2023, the company imported (via the Port of Rotterdam) 15 tons of fresh beef ("Brazilian chilled boneless beef") from Marfrig worth USD 119,000 and 101 tons of the same fresh beef product from Minerva worth USD 832,600.

This does not necessarily mean that Brazilian meat will be on sale at Albert Heijn under private label, but a verbal declaration that this will not happen is insufficient guarantee of compliance with the EU regulation. Consumers are already completely in the dark.

Methane

Beef production is not only risky when it comes to deforestation, it also has a large climate footprint due to methane emissions. Ruminants like cattle are the largest excluding natural sources of methane which is an extremely potent greenhouse gas. On a 100-year time scale, methane has a 28 times greater ability to warm the earth than carbon dioxide. On a 20-year time scale, methane is even 84 times more potent than carbon dioxide, which makes reducing methane emissions - particularly in the food system - all the more important for the 2050 climate goals.²⁸

JBS's methane emissions far exceed those of all other farms. Methane emissions from this one company exceed methane emissions from cattle in France, Germany, Canada and New Zealand combined. JBS's methane emissions contribute a significant portion of its total climate footprint, which exceeds the total greenhouse gas emissions of all of Spain.²⁹

Recommendations

Companies:

- Stop sourcing beef and other animal products that are connected to chains that can't guarantee the legality and sustainability of their agricultural inputs, such as grain for animal feed that is linked to deforestation.
- Implement full traceability, including of indirect suppliers.
- - Report transparently on results in terms of excluding deforestation and related themes, such as the contribution to the protein transition and improving animal welfare. progress towards a 50% reduction in animal products by 2040 in operations or supply; implementation of FARMS standards at minimum across operations or supply.

Government

- Within the EU, commit to strengthening the EU Deforestation Regulation by:
 - including other ecosystems besides 'forest', such as 'other wooded land' and valuable natural wetlands and grasslands and peatlands;
 - adding chicken and pork to the products covered by the regulation;
 - include financial institutions in the companies required to exclude deforestation products under the regulation.

- Improve the labeling requirement so that consumers can read on the packaging at all times which country (or countries) the meat contained in the product comes from.
- - Guarantee proper enforcement to prevent the supply of products on the Dutch market that do not comply with the EU deforestation regulation and labeling requirement.

Financial institutions

- Terminate investments in and loans and financial services to companies such as JBS where supply chain weaknesses enable legal and illegal deforestation.
- Terminate investments in and loans and financial services to companies that seek to frustrate and weaken deforestation legislation through lobbying activities undertaken by themselves and/or bodies in which they are represented.
- Report transparently on results on excluding deforestation and related topics, such as contribution to the protein transition and improving animal welfare. progress towards a 50% reduction in animal products by 2040 in operations or supply; implementation of FARMS standards at minimum across operations or supply.

Case A: Beef tenderloin in Makro linked to slaughterhouse JBS Andradina

For this case study, we zoom in on the product "beef tenderloin" sold at Makro. We briefly discuss the importer and expose how the risk of deforestation is linked to this product.

Beef tenderloin 1,846 kg (frozen product). Slaughter date July 5, 2022



Source: Mystery shopping; Makro Rotterdam; Zeemanstraat 2, 2991 XR, Barendrecht; 19 July 2023. Ref: RR - MAK - ROT - 23

Beef tenderloin 1.991 kg (frozen product). Slaughter date: August 5, 2022



Source: Mystery shopping; Makro Amsterdam; De Flinesstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023. Ref: RR-MAK-AMS-21

Linked companies:

Friboi

JBS Global UK; DFDS Logistics Winterswijk B.V. (EC number: NL-383-EEG). While the packaging lists JBS Global UK (Borehamwood, United Kingdom) as the importer of the product, the EG number refers to logistics company DFDS Logistics Winterswijk B.V. as the last supply chain holder of the product before it entered Makro. HSF Logistics and Eurofresh are part of DFDS Logistics.

Deforestation at direct and indirect suppliers: the numbers

3018 hectares between June 2020 -July 2023 by a supplier, Fazenda Mangabinha, in the municipality of Aquidauana (MS)

June 2020



July 2023



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2023 Planet Labs PBC.

On December 19, 2018, the owner of Fazenda Mangabinha delivered 20 cattle to another farm in Corumbá - MS for fattening. That farm in turn delivered directly to three JBS slaughterhouses, namely Andradina (SP), Anastácio (MS) and Campo Grande (MS), for the latter see also Case E. Thus, between April 14, 2019 and April 16, 2019, the cattle farm in Corumbá delivered 1,124 cattle to JBS Andradina. Moreover, between March 28, 2018 and May 31, 2019, they also delivered 1,260 animals for slaughter to JBS Campo Grande. Although these dates do not match the slaughter dates of the Makro products mentioned above, it is likely that there is an ongoing supplier relationship between the cattle farms and the three slaughterhouses. Once data for 2023 become available, this can be conclusive. Until then, the burden of proof to the contrary lies with JBS.

A 2022 study titled Cash Cow by Global Witness mentions JBS's ties to Amazon deforestation and human rights issues and refers to the JBS slaughterhouse in Andradina.³⁰ As the case studies in this study and others show, the long distances between the meat-processing plants in Brazil's southern states (e.g., São Paulo and Rio Grande do Sul) and the cattle-growing areas northward do not guarantee that their supply chains are free of deforestation and violations of the rights of indigenous peoples and local communities. An investigation by Reporter Brasil shows that "the long distances separating these factories [in Santo Antônio de Posse and Lins, ed.] from the main agricultural frontiers do not guarantee that their supply chains are free from deforestation and Indigenous Peoples' rights violations."³¹

Case B: Ribeye and stew meat from Makro linked to slaughterhouse Marfrig Bataguassu

For this case study, we zoom in on the products "Ribeye "and "stew meat" sold at Makro. We show how the risk of deforestation is linked to these products.

Ribeye BRA, weight 1.885 KG (frozen product). Slaughter date: 25/07/2022



Source: Mystery shopping; Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023.
Ref: RR-MAK-AMS-13

Ribeye BRA weight 1.665 KG (frozen product). Slaughter date: 29/04/2022



Source: Mystery shopping; Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023.
Ref: RR-MAK-AMS-19

Stew (fresh product). No slaughter date on package.



Source: Mystery shopping; Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023.
Ref: RR-MAK-AMS-24

Rib-eye steak, about 200 g (fresh product). No slaughter date on package.



Source: Mystery shopping; Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023.
Ref: RR-MAK-AMS-25

Beef ribeye, weight 1.930 KG (fresh product). Slaughter date: 29/05/2023



Source: Mystery shopping; Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023.
Ref: RR-MAK-AMS-28

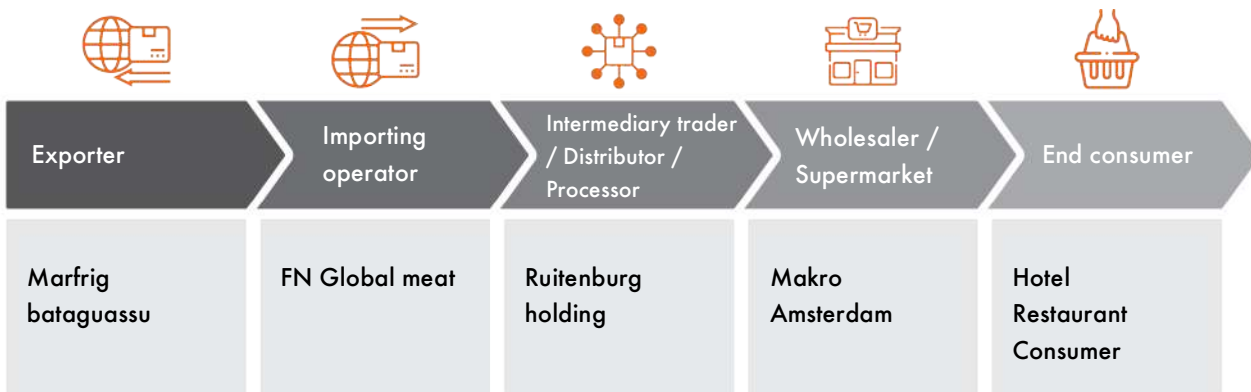
Linked companies:



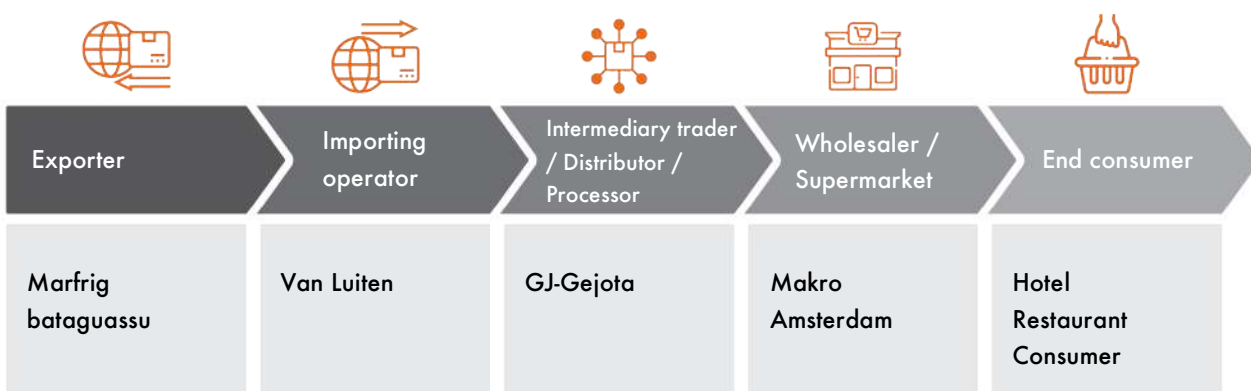
Companies importing: Luiten Food BV; Chateau Viande (part of Ruitenbergh Holding).

Import company Van Luiten Food (products RR-MAK-AMS-13 and RR-MAK-AMS-19) was found in the cargo records. Since 2018, Van Luiten Food (Leidschendam) has been part of the Australian company Thomas Foods International. Between January 1, 2021 and June 30, 2023, Van Luiten Food in Rotterdam imported a total of 349 MT (total value USD 2,066,600) of fresh beef (HS 0201) and 178 MT (total value USD 891,600) of frozen beef (HS 0202.) from Marfrig Global Foods from Port Santos and Port Paranagua in Brazil, respectively. In addition to Marfrig, Van Luiten Food also sources beef from C Vale Cooperativa, Vibra Agroindustrial and BRF. Chateau Viande (Utrecht) is part of the Dutch company Ruitenbergh Holding (products RR-MAK-AMS-24, RR-MAK-AMS-25, RR-MAK-AMS-28 with EG number NL-42-EG³²) in Utrecht. Chateau Viande Utrecht was created in 2019 through the integration of Bobeldijk Vleesproducten, Dutch Meat Service and Ruitenbergh Quality Foods.³³ The investigators shared the photo of the stew meat product (RR-MAK-AMS-24) in an e-mail with Ruitenbergh to request information about the middleman. Based on the photo, a Ruitenbergh employee replied in September 2023 that "based on batch number [the photo shows two numbers: the REF/Batchnr: 990207387 and the number without explanation: 0857240723, ed.] this would come from FN Global Meat." FN Global Meat is one of the Netherlands' largest meat importers from Brazil. Import data shows that between January 1, 2021 and July 31, 2023, the company imported a total of 3,931 tons of fresh beef products (HS 0201) from Brazil worth USD 24.6 million, and 1,731 tons of frozen beef products (HS 0202.) worth USD 9 million through the Port of Rotterdam. Most of the fresh beef share is supplied by Marfrig (74%), followed at a great distance by JBS (including Friboi) with 10%. For frozen beef, Marfrig is also the main supplier (66%), followed by JBS (18%).

Supply chain of product RR-MAK-AMS-24



Supply chain of product RR-MAK-AMS-13



Deforestation at direct and indirect suppliers: the numbers

798 hectares between December 2022 and July 2023 at supplier 1, in the municipality of Ribas do Rio Pardo, MS.

307 hectares between January and February 2021 at supplier 2 (consisting of two companies), in the municipality of Agua da Clara, MS.

999 hectares between August 2022 and April 2023 at supplier 3, in the municipality of Corumbá, MS.

Supplier 1: Fazenda Taboca

December 2022



July 2023



Source: AidEnvironment, based on deforestation data (Prodes and MapBiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2023 Planet Labs PBC.

This supplier deforested 798 hectares between December 2022 and July 2023. This was confirmed by Prodes and MapBiomas, two Brazilian authorities on deforestation. Also, fazenda Taboca has a history of environmental fines. This fazenda directly supplied 203 cattle to the Marfrig slaughterhouse in Bataguassu. In 2018, the same fazenda also delivered 100 animals to the JBS slaughterhouse in Campo Grande included in this study (see Case E). Since no data on animal transportation in Mato Grosso do Sul are publicly available after 2019, AidEnvironment cannot confirm whether the cattle farm continues to supply the same slaughterhouses after 2019. Since deforestation on the farm occurred between December 2022 and July 2023, the product RR-MAK -AMS-28, in particular, with slaughter date 29/05/2023 is a high-risk product. The burden of proof is on Marfrig and JBS.

Supplier 2: Fazenda Sucuri and Fazenda Tangara

Fazenda Sucuri

January 2021



February 2021



Fazenda Tangara

January 2021



February 2021

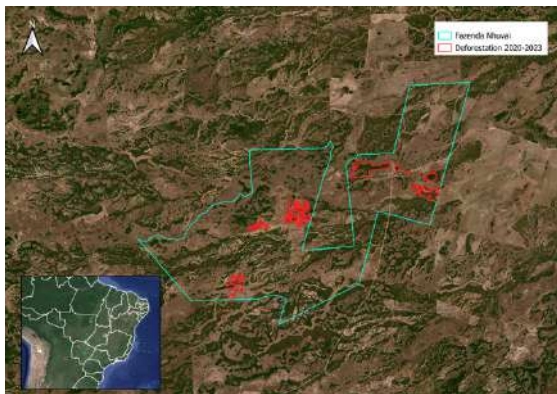


Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2021 Planet Labs PBC.

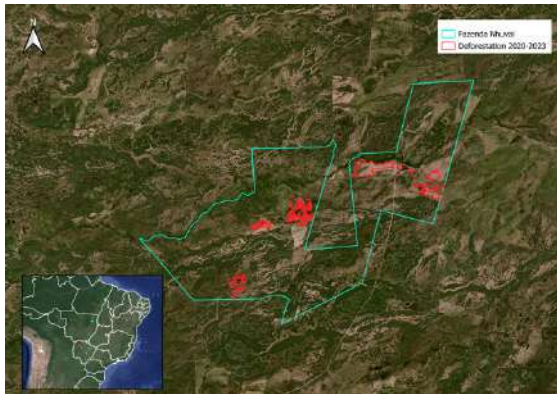
The owner of these two farms in the municipality of Agua Clara in Mato Grosso do Sul deforested a total of 307 hectares of native vegetation on his cattle farms between January and February 2021. Fazenda Sucuri delivered 161 cattle directly to the Marfrig slaughterhouse in Bataguassa between February 26, 2018 and March 23, 2018, and another 40 animals on May 24, 2019. Fazenda Tangara delivered 70 cattle directly to the slaughterhouse between February 26, 2018 and March 23, 2018. Whether these farms are still direct suppliers to this Marfrig slaughterhouse in 2022 and 2023 (the slaughter dates of meat products 1 to 5 in the Makro) has not been confirmed, but the burden of proof is on Marfrig.

Supplier 3: Fazenda Nhuvai

August 2022



April 2023



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2023 Planet Labs PBC.

The owner of this fazenda deforested 999 hectares on his cattle farm between August 2022 and April 2023. This was an indirect supplier to Marfrig Bataguassu in 2018. Whether this fazenda is still an indirect supplier to this Marfrig slaughterhouse in 2022 and 2023 (the slaughter dates of meat products 1 to 5 in Makro) is not known, but the burden of proof is on Marfrig.

Case C: Beef ribeye and steak, sirloin steak, beef baby tops and carpaccio in Makro linked to slaughterhouse Marfrig Tangará Da Serra

In this case study, we zoom in on some beef products for sale at Makro and zoom in on the supply chain. We show how these products are linked to the risk of deforestation.

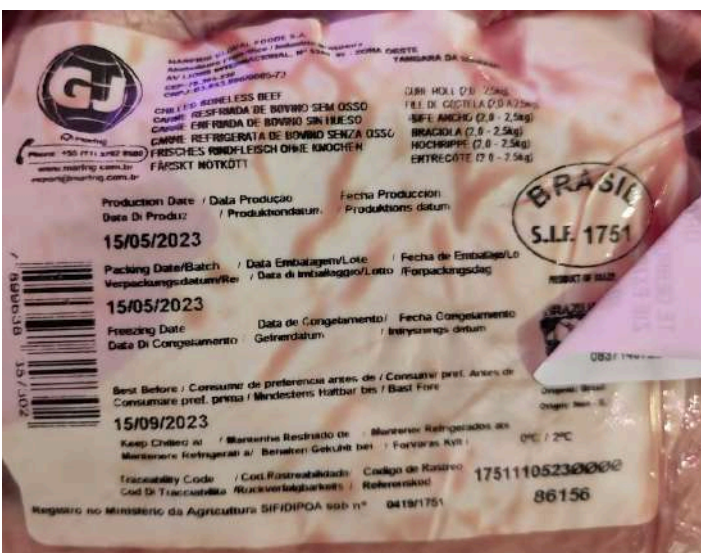
Carpaccio (frozen product), no slaughter date on package



Source: Mystery shopping; Makro Rotterdam; Zeemanstraat 2, 2991 XR, Barendrecht; 19 July 2023

Ref: RR - MAK - ROT 19 and in Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023; Ref: RR-MAK-AMS-14

Beef sirloin steak (fresh product). Slaughter date: 15/05/2023



Source: Mystery shopping; Makro Rotterdam; Zeemanstraat 2, 2991 XR, Barendrecht; 19 July 2023

Ref: RR - MAK - ROT-09

Ribeye steak, 180-200 gr (fresh), no slaughter date. Beef ribeye (fresh), 1,800 KG, slaughter date: 26/05/2023



Source: Mystery shopping; Left: Makro Rotterdam; Zeemanstraat 2, 2991 XR, Barendrecht; 19 July 2023
 Ref: RR-MAK-ROT-32. Also found in Makro Delft; Schieweg 104, Delft, Zuid-Holland, 2627 AR; 3 July 2023; Ref: RR-MAK-DLFT-04.
 Right: Makro Rotterdam; Zeemanstraat 2, 2991 XR, Barendrecht; 19 July 2023
 Ref: RR-MAK-ROT-35

Beef ribeye ½ (fresh). No slaughter date on package



Source: Mystery shopping; Makro Rotterdam; Zeemanstraat 2, 2991 XR, Barendrecht; 19 July 2023
 Ref: RR-MAK-ROT-36. Also found in Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023; Ref: RR-MAK-AMS-31

Beef babytops BRAZ (frozen product). Slaughter date: 15/12/2022



Source: Mystery shopping; Makro Amsterdam; De Flinesstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023;
Ref: RR-MAK-AMS-20

Beef ribeye/entrecote (fresh product). Slaughter date: 27/05/2023



Source: Mystery shopping; Makro Amsterdam; De Flinesstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023; Ref: RR-MAK-AMS-27. Potentially same product as RR-MAK-ROT-09 but with different slaughter date.

Linked companies:

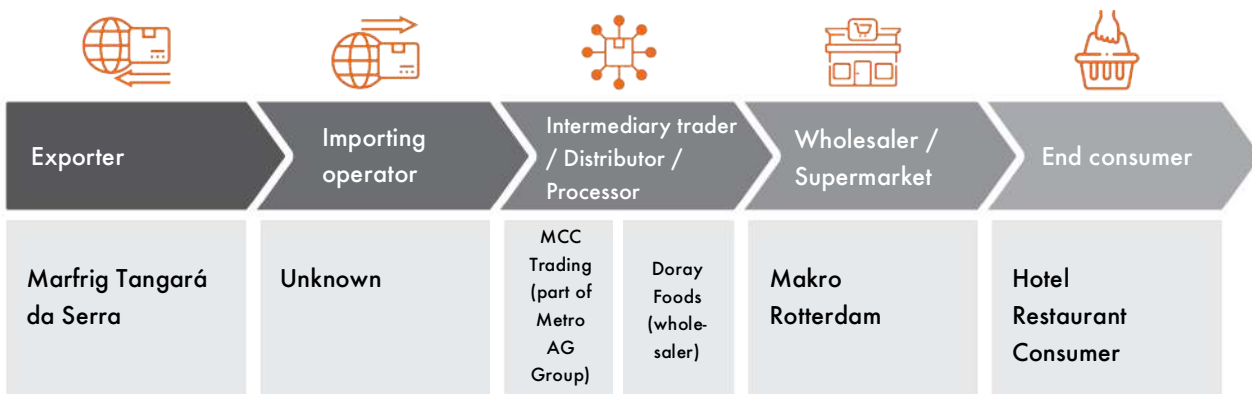


Companies importing: Chateau Viande (part of Ruitenbergh Holding (Utrecht NL); MCC Trading International GmbH (Düsseldorf-DE); Doray Foods GmbH Warenhandel (Neumünster-GE).

Chateau Viande (Utrecht) is part of the Dutch company Ruitenbergh Holding (**products RR - MAK - ROT 32; RR - MAK - ROT 35; RR - MAK - ROT 36; RR-MAK-AMS-27; RR-MAK-AMS- 31; RR-MAK-DLFT-04** with EG number NL-42-EG³⁴) in Utrecht. An e-mail exchange with Ruitenbergh revealed that they source beef through middlemen, such as FN Global Meat. Because customers do not have access to information about the suppliers behind the "batch numbers" listed on the beef packages, AidEnvironment cannot confirm the identity of the middleman for this particular meat product.

P Products RR - MAK - ROT 14; RR - MAK - ROT 19 (similar product) can be linked to Doray Foods GmbH Warenhandel (Neumünster, DE) via the EC number (DE-SH00574-EG³⁵). Doray Foods is a wholesaler that cannot be found in the import data under this name. The same products also have company MCC Trading International listed on the packaging, a logistics company that, like Makro, is owned by Metro AG. MCC Trading International is not found in the import data under this name and therefore likely received beef through a middleman.

Supply chain of product RR-MAK-ROT-19



Deforestation in direct and indirect suppliers: the numbers

76 hectares between May 2021 and May 2022 at supplier **Fazenda Campo Alegre** in the municipality of Água Boa, Mato Grosso (hereafter MT)

May 2021

May 2022



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2022 Planet Labs PBC.

This supplier that deforested 76 hectares on its territory between May 2021 and May 2022 delivered 88 cattle to be fattened to the Fazenda Sao Jorge in the municipality of Nova Marilândia, Mato Grosso, on June 29, 2018. In turn, between June 5, 2018 and May 24, 2019, this farm in Nova Marilândia supplied 355 animals for slaughter to Marfrig's Tangará da Serra slaughterhouse in Mato Grosso. Fazenda Campo Alegre also supplied slaughter animals directly to the slaughterhouses of JBS Água Boa (MG) in 2018-2019, JBS Barra do Garças (MT) in 2018-2019, Marfrig Nova Xavantina (MT) in 2018-2019 and Marfrig Paranatinga (MG) in 2019. Mato Grosso is located in the Amazon, Cerrado and Pantanal biomes and is part of the legal Amazon region.³⁶

Joint research from 2023 by Repórter Brasil, the Bureau of Investigative Journalism (TBIJ) and The Guardian (and supported by AidEnvironment) linked the Marfrig slaughterhouse in Tangará da Serra to cattle laundering, Amazon deforestation and the invasion of indigenous territories. The Forbidden Stories project³⁷ revealed that nearly 500 cattle were transferred to a sanctioned cattle farm [sanctioned by Ibama in 2012 for nearly BRL 2.2 million for illegal deforestation of the rainforest, ed.] near Rio Claro (MT). This cattle farm in turn arranged for the transportation of cattle to another cattle farm several hundred kilometers away, near Maloca de Indios (MT) in August 2022. The grazing land there is considered "clean" and would have no link to deforestation. Other documents confirm that in January 2023, more than 200 cattle were sent from this company's pasture land to the Marfrig slaughterhouse in the town of Tangará da Serra. In 2022, another TBIJ study³⁸ linked the Tangará da Serra plant to the invasion of the indigenous territory of Menku in Brasnorte. That study linked the Tangará da Serra slaughterhouse to Nestlé, MacDonald's and Burger King. Since Makro sells at least six products from this controversial Marfrig slaughterhouse, with slaughter dates in 2023 (and unknown slaughter dates), the company is on very thin ice.

Case D: Beef tenderloin in Makro linked to Marfrig Mineiros

In this case study, we zoom in on the product "beef tenderloin" at Makro. We zoom in on the supply chain and expose how the risk of deforestation is linked to this product.

Beef tenderloin 3/4 (fresh product). Slaughter date: May 30, 2023



Source: Mystery shopping; Makro Amsterdam; De Flinsstraat 9, 1114 AL, Amsterdam-Duivendrecht; 28 July 2023. Ref: RR-MAK-AMS-30

Linked companies:



Companies importing: GJ-Gejota (Marfrig); Chateau Viande (part of Ruitenburg Holding) (Utrecht-NL).

The EG number (NL-42-EG) refers to Ruitenburg Holding B.V., the parent company of Chateau Viande (Utrecht). Neither of these names appears in the import data. In an e-mail exchange with Ruitenburg, it became clear that they import beef through middlemen, such as FN Global Meat. However, because customers do not have access to information about the suppliers behind the "batch numbers" listed on beef packages, AidEnvironment cannot confirm the identity of the middleman for this particular meat product. It is likely to import its meat through some of the major importers, such as FN Global Meat, GVFI or Zandbergen.

Deforestation in direct and indirect suppliers: the numbers

229 hectares between January and October 2021 at a supplier **Fazenda Nossa Senhora Aparecida** in the municipality of Bom Jardim De Goiás - GO.

December 2020



October 2021



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2021 Planet Labs PBC.

This supplier directly delivered 989 animals for slaughter to the Marfrig slaughterhouse in Mineiros (GO) between May 4, 2018 and April 14, 2023. During the same period, this supplier also deforested 229 hectares of forested savanna vegetation on its property, to be specific between January 2021 and October 2021. This is after the EUDR deadline. As a result, the importer of this meat will not meet the EUDR depending on how densely forested the Cerrado vegetation is on the cattle farm. According to the FAO-derived definition in the EUDR, forests are defined as "land that covers more than 0.5 hectares with trees taller than 5 meters. The canopy must be more than 10 percent, or the trees must still be able to reach these values." Based on the MapBiomas data³⁹, this area is likely classified as "forest" and thus the deforestation will fall under the new EUDR legislation, making it in violation of these new regulations. The cattle farm is also a direct supplier to Marfrig in Pirenópolis-GO.



Source: AidEnvironment, image showing the vegetation on the Fazenda Nossa Senhora Aparecida farm before it was cleared after January 2021.

Case E: Beef ribeye at Hanos linked to slaughterhouse JBS Campo Grande

For this case study, we zoom in on the product "beef ribeye" sold at the Hanos. We briefly discuss the importer and expose how the risk of deforestation is linked to this product.

Beef Rib Eye Gep. Zuid Amerika (frozen product). No slaughter date indicated



Source: Mystery shopping; Hanos Delft; Kleveringweg 572616 LZ Delft; 3 juli 2023. Ref: RR-HAN-DLFT-08

Linked companies:



This product is imported by Van der Zee Vlees BV (Twello). It is unclear under which name Van der Zee imports Brazilian beef, as the names "Van der Zee" or "Hanos" do not appear in freight records or through which middlemen the meat is imported. These may include some of the largest beef importers in the Dutch market, including GVFI, FN Global Meat or Zandbergen. Despite Hanos' assurances that it no longer sells Brazilian meat, investigators found a Brazilian beef product at Hanos Delft. Interestingly, Hanos labels its beef from Uruguay as "Uruguayan beef," and from Argentina and Paraguay as "Argentinian beef" or "Paraguayan beef," respectively, but the product found from Brazil was labeled "South American beef".

Supply chain of product RR-HAN-DLFT-08



Deforestation at direct and indirect suppliers: the figures

3435 hectares deforested between January 2021-July 2023 at supplier 1, in the municipality of Quidauana, Mato Grosso do Sul (hereafter MS)

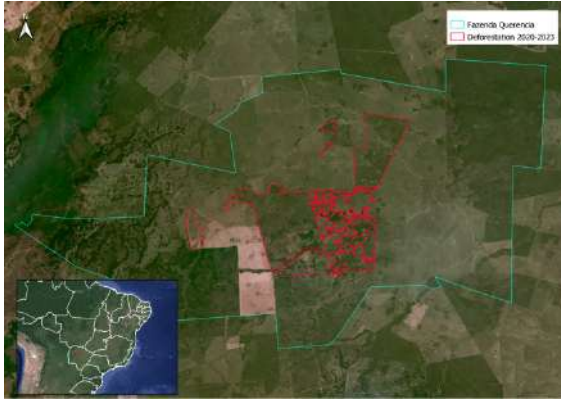
798 hectares between December 2022-July 2023 at supplier 2, in the municipality of Ribas do Rio Pardo, MS

309 hectares between February -May 2022 at supplier 3, in the municipality of Pedro Gomes, MS

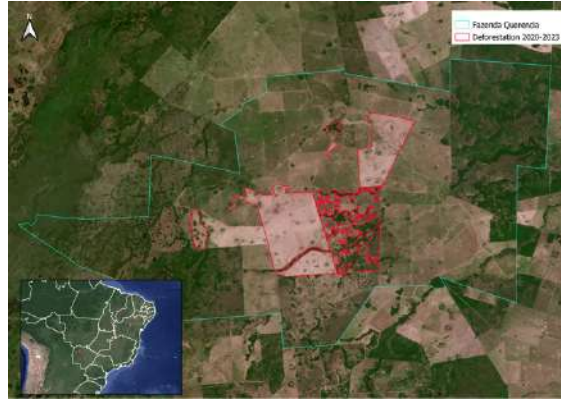
1348 hectares between January 2021 to December 2022 at supplier 4, in municipality of Rio Verde de Mato Grosso, MS

Supplier 1: Fazenda Querencia

December 2020



December 2021



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2021 Planet Labs PBC.

This supplier deforested the significant amount of 3,435 hectares between January 2021 and July 2023. The owner of the cattle farm at the time of deforestation is associated with numerous environmental violations and fines totaling 15,257,642 Brazilian real (hereafter BRL). One received in 1970 (BRL 652,782), 1 in 2016 for the destruction of 2,793 ha of indigenous forest (BRL 13,970,000), 1 in 2016 for failure to comply with an embargo of an irrigation project (BRL 120,000), 2 in 2010 for clearing 408 ha of indigenous vegetation in the Pantanal biome (BRL 250. 500) and for burning wood materials as a result of deforestation (BRL 167,000), 2 in 2003 for deforestation without permission (BRL 90,000) and for transporting wood without a valid driver's license (BRL 2,400). 1 in 1999 for transporting forest products without a valid license (BRL 4.960). There has also been an embargo since 2010 on this farm for a 0.038-hectare piece of land. And since 2016 on an area of 2.935 hectares. There has been deforestation in the legal Amazon.

This farm is both direct and indirect supplier to the JBS slaughterhouse in Campo Grande. On April 5, 2019, the owner delivered four cattle directly from his Querencia farm to JBS Campo Grande. He was the registered owner of nine cattle farms until the end of 2022 and appears to move his animals between his cattle farms, possibly to launder cattle movements. For example, from this farm, between October 24, 2018 and July 22, 2019, he delivered 33 animals for fattening to a farm in the municipality of Terenos-MS, which in turn delivered 13 animals for slaughter to JBS Campo Grande on October 24, 2018. The new owner of the cattle farm also delivered directly to JBS Campo Grande. Between March 18, 2019 and June 18, 2019, he delivered 119 animals directly to JBS Campo Grande for slaughter.

Supplier 2: Fazenda Toboca

December 2022



July 2023



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2023 Planet Labs PBC.

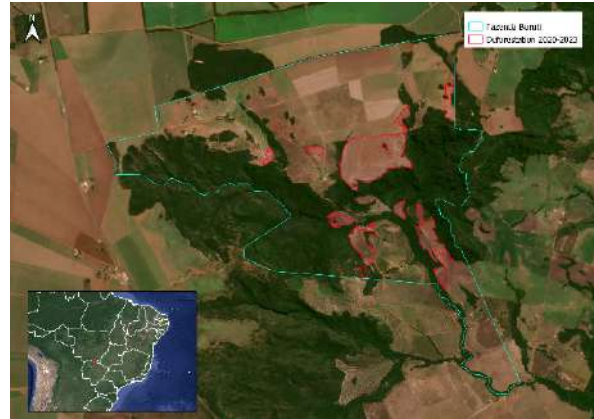
This cattle farm with 798 hectares of deforestation between December 2022 and July 2023, supplied 100 animals directly to the JBS slaughterhouse in Campo Grande in 2018. In 2018 and 2019, they also delivered animals to Marfrig's slaughterhouse in Bataguassu, see also Case Study B. Because no data on animal transport in Mato Grosso do Sul is publicly available after 2019, AidEnvironment cannot confirm whether the cattle farm continues to deliver to the same slaughterhouses after 2019, but the burden of proof is on JBS.

Supplier 3: Fazenda Buriti

February 2022



May 2022



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2022 Planet Labs PBC.

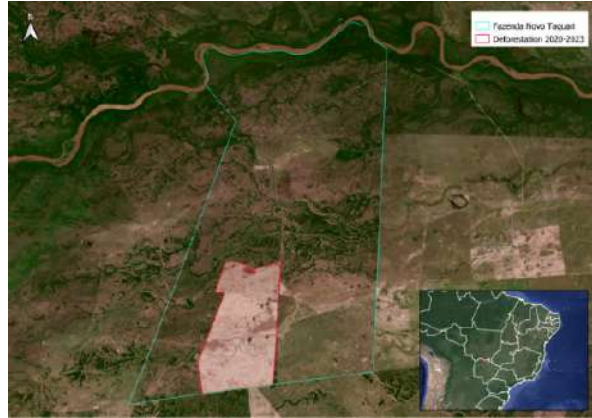
This supplier from the municipality of Pedro Gomes (MS) deforested 309 hectares between February-May 2022. In addition, between May 14, 2018 and February 13, 2019, this cattle farm directly delivered 120 slaughter cattle to the JBS slaughterhouse in Campo Grande. The owner of fazenda Buriti was fined 2022 in the municipality of Coxim for setting fire in an agricultural area (BRL 20,000). The cattle farm also indirectly supplies JBS Campo Grande. For example, on June 12, 2019, fazenda Buriti delivered 36 animals to a farm in Coxim-MS for fattening, which in turn delivered 39 animals for slaughter to JBS Campo Grande between January 11, 2019 and January 12, 2019. Since no data on animal transportation in Mato Grosso do Sul are publicly available after 2019, AidEnvironment cannot confirm whether the company is still supplying the same slaughterhouses after 2019, but the burden of proof lies with JBS.

Supplier 4: Fazenda Nova Taquari

December 2020



December 2022



Pictures on top: before and after clearing on Fazenda Nova Taquari. Picture on bottom: fires in the northern cleared part of the farm on August 4th in 2023. Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2022 Planet Labs PBC and EO Browser Sentinel data 2023.

This supplier in the municipality of Rio Verde de Mato Grosso in Mato Grosso do Sul - MS deforested 1348 hectares between January 2021 and December 2022. In addition, this company indirectly supplied JBS Campo Grande through Fazenda Pregoica in Coxim, MS. On December 13, 2018, Fazenda Nova Taquari delivered 111 cattle to Fazenda Pregoica in Coxim-which in turn delivered 118 animals to JBS Campo Grande on February 1, 2019.

Supplier 5: Fazenda Morro Pontudo

December 2020

December 2022



Source: AidEnvironment, based on deforestation data (Prodes and Mapbiomas) and rural cadastre data (SIGEF, SNCI). Imagery © 2022 Planet Labs PBC.

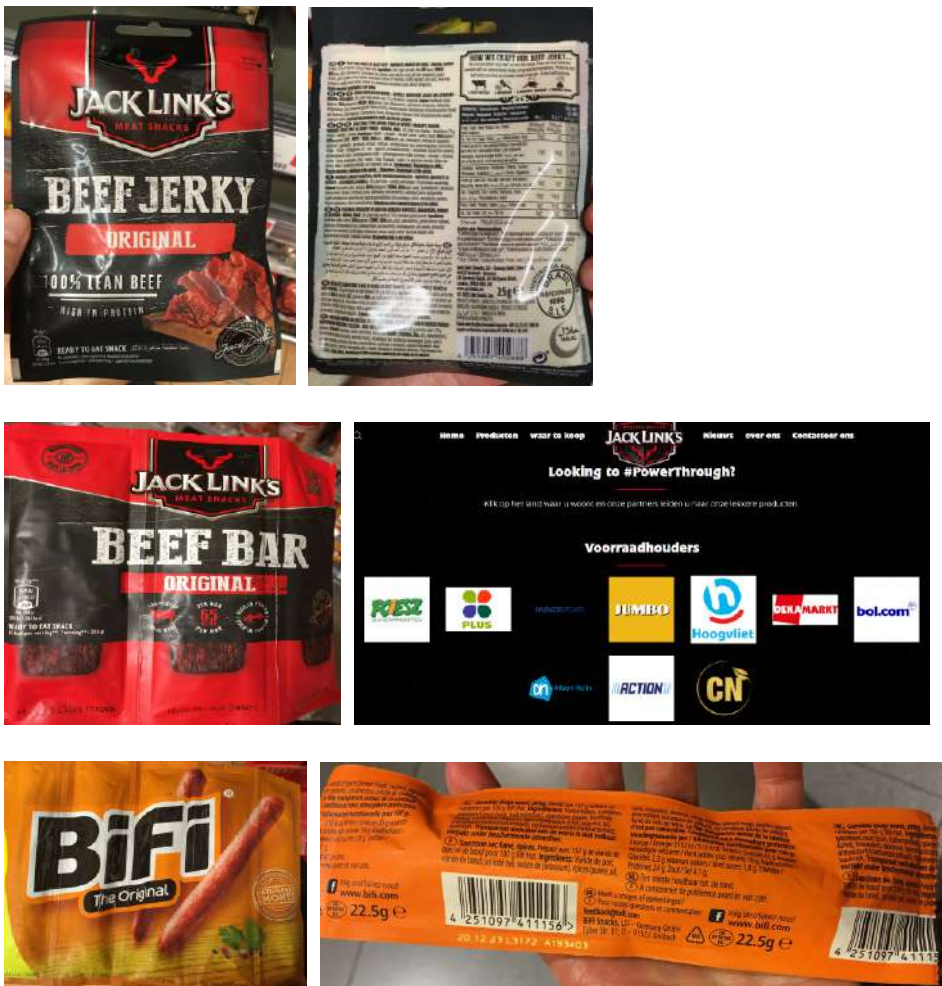
This supplier deforested 1,054 hectares between January 2021- December 2022 and indirectly supplied JBS Campo Grande through several cattle farms. For example, on March 13, 2018, this fazenda Morro Pontudo delivered 64 animals to Fazenda Campo Florido in the municipality of Porto Murtinho (MS) for fattening. That company has a direct supplier relationship with JBS Campo Grande, for example, it delivered 100 animals to the slaughterhouse in January 2018 and 80 animals in February 2018. Fazenda Morro Pontudo also delivered cattle to a company near Campo Grande (MS) on March 13, 2018, which in turn delivered 11 animals for slaughter to JBS Campo Grande on July 18, 2018.

Embargo(s) on cattle farm: two embargoes. one since 2017 on Fazenda Morro Pontudo (Corumbá - MS) for (possible) pollution without a permit, and one since 2016 on Fazenda Alto Guapore (Vale de São Domingos, MT) for (possible) pollution without a permit.

Environmental fines: two environmental fines, one in 2017 at Fazenda Morro Pontudo (Corumbá, MS) for (possible) pollution without a permit (BRL 550,500), one in 2016 at Fazenda Alto Guapore (Vale de São Domingos/MT) for (possible) pollution without a permit (BRL20,000).

Case F: Jack Link's beef jerky, beef bar and bifi sausages in supermarkets linked to slaughterhouses JBS Santo Antônio de Posse and JBS Lins

This case study discusses three products from the same producer, Jack Link's, for sale in Dutch supermarkets. Mystery shopping revealed that Jack Link's beef jerky is on sale at Jumbo, Albert Heijn and Dekamarkt. Online research shows that Jack Link's beef jerky is also in the assortment of Poiesz supermarkets, Naskor Sports, Hoogvliet, Bol.com, Action, Plus and CN (see photo below). BiFi snacks are available almost everywhere, right down to station kiosks. In this case study, we address the unclear origin of the meat and the lack of transparent information provided to consumers.



Photos on top left and right: beef jerky. Source: Mystery shopping; Albert Heijn Amsterdam; Land van Cocagneplein 3, 1093 NB Amsterdam; 26 July 2023; Ref: JF-AH-2-AMS-02 and Jumbo Amsterdam Linnaeusstraat and Oostelijke Handelskade; 26 and 30 July 2023; Ref: JF-JU-1-AMS-03 and JF-JU-2-AMS-07 and Jumbo Culemborg; 29 May 2023; Ref: SD-JU-CU-02 and Dekamarkt Amsterdam Slotermeerlaan; 24 August 2023; Ref: SD-DE-AM-04. Photo in middle left: beef bar. Source: Mystery shopping, Jumbo Culemborg; Koopmansgildeplein 16, 4105 TX Culemborg; 15 June 2023 (Ref: SD-PL-CU-04) and Jumbo Amsterdam; Linnaeusstraat 245, 1093 ER Amsterdam; 26 July 2023 (Ref: JF-JU-1-AMS-04). Photo in the middle right: where to buy beef jerky in the Netherlands. Source: website Jack Link's⁴⁰. Photos at bottom: BiFi products confirmed in assortment of Aldi, Makro, Jumbo, Spar, Dekamarkt.

Linked companies:



Importing companies: LSI-Germany GmbH (Ansbach), LSI-Netherlands (Amsterdam)

Jack Link's beef jerky products found in several Dutch supermarkets during the mystery shopping were sourced from a meat processing plant owned by Meat Snack Partners do Brazil in the municipality of Santo Antônio de Posse in the state of São Paulo (SIF code 1690). There is evidence that this company and plant is majority owned by JBS, and that JBS and Jack Link's make beef jerky in the industrial processing units of Santo Antônio de Posse and Lins, both in the state of São Paulo. See, for example, the list of JBS subsidiaries⁴¹, in this news article⁴² on JBS and Jack Link's, and in the screenshots below (Orbis).

orbis

MEAT SNACK PARTNERS DO BRASIL LTDA.
SÃO PAULO, Brazil

Active Private
BvD ID: BR13171927000136 Orbis ID: 141351975
This company is the Global Ultimate Owner of the corporate group

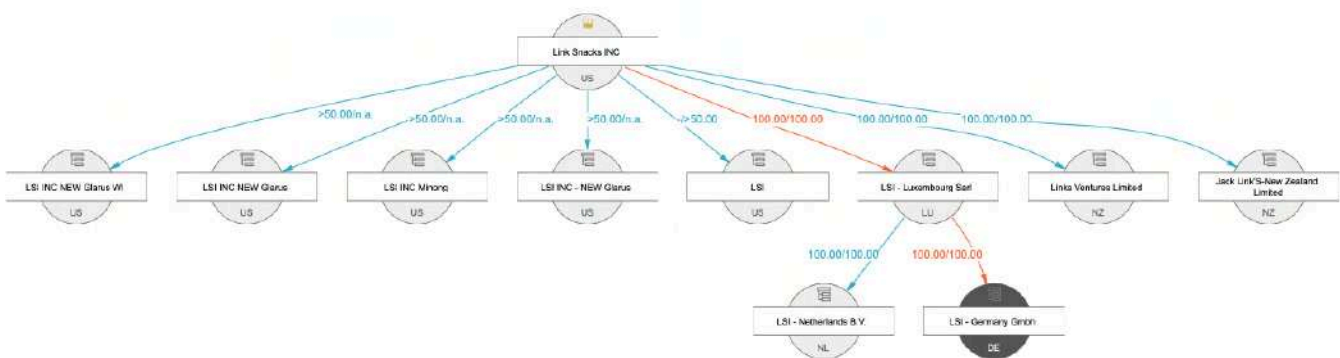
Current shareholders

Name	Country	Type	Ownership		Source	Date	Op. Rev. (m USD)
			Direct %	Total %			
JBS S.A.	BR	C	-	50.00	BO	05/2023	72,163

No of employees

Name	No of employees
JBS S.A.	n.a.

Legend
 There are names that are the same, or similar to, a risk relevant name
 C = Corporate



Source: Picture top left: JBS holds 50% share in company Meat Snack Partners do Brasil (source: Orbis). Photo top right: Google Earth screenshot of entrance of the MSP-Jack Link's-JBS complex in Santo Antônio de Posse, indicating all three JBS-linked companies on the red sign (coordinates: 22°36'12"S; 47°00'25"W). Figure middle: Corporate Group Link Snacks Inc, including LSI-Germany and LSI-Netherlands (source: Orbis).



Relação de Estabelecimentos

SIF	Razão Social	Logradouro	Município
UF : SP			
Área : CARNE			
Categoria : UNIDADE DE BENEF. DE CARNE E PROD. CÂRNEOS			
Classe : CONSERVAS - ATÉ 10 T/D - CC3			
1591	QUALYMEAT INDÚSTRIA E COMÉRCIO DE ALIMENTOS LTDA	ESTRADA GUARIROBA, 326	CARAPICUÍBA
1592	ESPETINHOS VINHEDO LTDA	AVENIDA PRESIDENTE CASTELO BRANCO, 2411	VINHEDO
1601	JAMONES SALAMANCA INDUSTRIA DE CONSERVAS LTDA	ROD. WASHINGTON LUIS, Km 385	CATANDUVA
1690	MEAT SNACK PARTNERS DO BRASIL LTDA	ROD SP 340, Km 142, S/nº, GALPAO 2	SANTO ANTÔNIO DE POSSE
1725	FAVORITO COMÉRCIO E INDÚSTRIA DE CARNES LTDA	EST MUN PIRAPOZ/CEL. GOULART, S/Nº, KM 0,1	PIRAPOZINHO
1755	FRIGORIFICO MARBA LTDA	AV CESAR MAGNANI, 971	SÃO BERNARDO DO CAMPO
1765	OMAMORI INDÚSTRIA DE ALIMENTOS LTDA	RODOVIA ENGENHEIRO MIGUEL MELHADO CAMPOS - VINHEDO-VIRACOPOS, KM 79, BLOCO A	VINHEDO
1765	OMAMORI INDÚSTRIA DE ALIMENTOS LTDA	AV. TIRADENTES S/N	VINHEDO
1999	GELITA DO BRASIL LTDA	RAMIRO TAFNER PRIMO N° 615	MOCOCA
2043	FRIGO-CHARQUE SERRA NEGRA LTDA-	ROD. VICINAL SEBASTIÃO TEIXEIRA COELHO, S/Nº, ZONA RURAL	SERRA NEGRA
2044	DOCEFRUTA INDÚSTRIA E COMÉRCIO DE PRODUTOS ALIMENTÍCIOS LTDA - EPP	RUA JOAO BATISTELA, 45	SÃO PEDRO DO TURVO
2093	JBS S.A	RUA NILDO THEODORO DAVOGLIO, 96	GUARARAPES
2119	FRIGORIFICO MARBA LTDA	AV ANTONIO FREDERICO OZANAN, 4270	TAQUARITINGA
2209	MINI CHURRASCO LEONI LTDA	ESTRADA DOS CASAS, 1775	JUNDIAÍ
2267	FRIGORIFICO ORENSE LTDA	RUA MARANHÃO, 383	SÃO BERNARDO DO CAMPO
2300	BANDEIRANTE ALIMENTOS COMERCIO DE CARNES LTDA - ME	AV JOÃO PAULO I, 900	SANTANA DE PARNAÍBA
2359	LIOTECNICA TECNOLOGIA EM ALIMENTOS S. A.	RUA FLORIANOPOLIS, 796	EMBU
2506	PRODUTORA DE CHARQUE CAMPEÃO LTDA	AV. DAS COMUNICAÇÕES, 333	SANTANA DE PARNAÍBA
2532	SEARA ALIMENTOS LTDA	AV. MARIO SARTOR 77	OSASCO
2584	ANIDRO DO BRASIL EXTRAÇÕES S. A.	RUA VICENTE PAULA COSTA, 24	BOTUCATU
2611	FRIGORIFICO VILHENA LTDA	RUA ANTONIO ROBERTO DE ALMEIDA 236	CAJAMAR
2631	FABRICA DE LINGUIÇAS ENGENHEIRO GOULART LTDA	RUA ANTONIO ROBERTO ALMEIDA, 290	SÃO PAULO
2631	FABRICA DE LINGUIÇAS ENGENHEIRO GOULART LTDA	RUA SOUZA FILHO, 688	SÃO PAULO
2639	VIC VERO COMÉRCIO DE ALIMENTOS LTDA	RUA PIRAJA N° 1299, 1299 1305 E 1317	SÃO PAULO
2641	FRIGORIFICO ROCCA LTDA	AV. SILPA, S/Nº	LARANJAL PAULISTA
2751	INDÚSTRIA E COMÉRCIO DE CARNE LARANJAL LTDA EPP	EST DA COLONIA, 375	JUMIRIM
2775	INDÚSTRIA E COMÉRCIO DE CARNES JUMIRIM LTDA	EST. MUNICIPAL DO GUANABARA, 333	MOGI DAS CRUZES
2823	INDÚSTRIA E COMÉRCIO DE ALIMENTOS ESPERANÇA LTDA	RUA EUGENIO RONCON, 490	RIBEIRÃO PIRES
2973	ROGÉRIO MÁRCIO FERREIRA DE SOUZA -EPP	RUA BARÃO DO RIO BRANCO, 333	GUARATINGUETÁ
2988	ALUISIO MENDES FERNANDES		

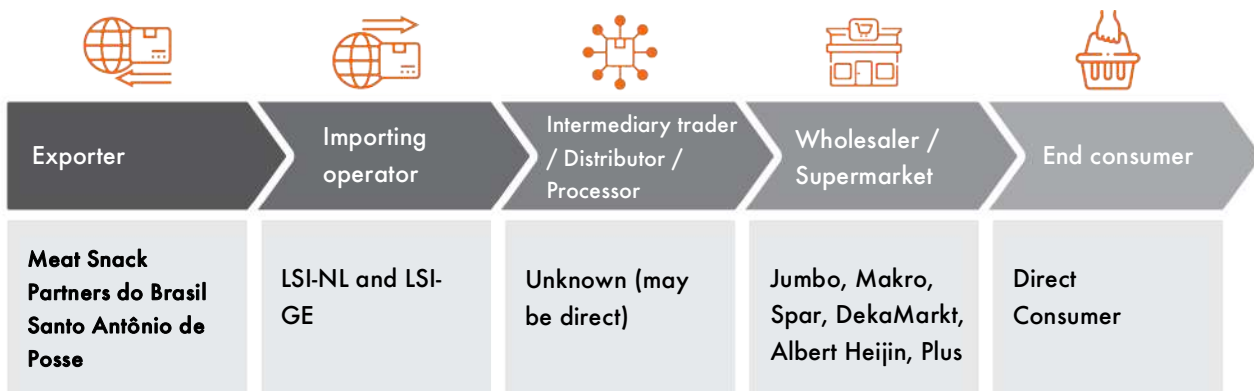
Source: snapshot of Brazilian Ministry of Agriculture list of slaughterhouses including SIF-codes, showing that SIF code 1690 is linked to Meat Snack Partners do Brasil.

BiFi is another important brand in Jack Link's family. Following the acquisition of the Ansbach plant in 2014, LSI-Germany GmbH (Link Snack Incorporation) was founded. The German plant, previously owned by Unilever for more than 40 years, produces 450 million meat snacks a year under the Bifi, Peperami and Jack Link's brands.⁴³ Freight data analyzed by AidEnvironment show that LSI-Germany GmbH (Ansbach) and LSI-Netherlands (Amsterdam) are the main importers of prepared beef (HS 160250) from Meat Snack Partners do Brasil in Brazil. The import data between January 1, 2021 and June 30, 2023 shows that LSI-Netherlands imported 2,735 tons (worth USD 26,458,400) of "dried cooked beef jerk" from Meat Snack Partners Do Brasil during this period, while LSI-Germany imported 93.7 tons of meat of this product (worth USD 948,500) during the same period.

Unfortunately, no GTA data are available for Meat Snack Partners do Brasil's facility linked to JBS Santo Antônio de Posse in São Paulo. However, Meat Snack Partners do Brasil's facility in Lins is directly linked to JBS Lins' slaughterhouse, which does appear in the GTA data. In addition, JBS confirmed to Repórter Brasil that "the (...) Santo Antônio de Posse (SP) plant can receive meat for processing from any JBS unit, always in accordance with the company's Responsible Commodity Procurement Policy and each plant's market qualifications, as well as the customer's specific requirements regarding the product.

A December 2021 study by Repórter Brasil revealed that "the long distances separating these factories [in Santo Antônio de Posse and Lins, ed.] from the main agricultural frontiers do not guarantee that their supply chains are free of deforestation and violations of indigenous peoples' rights.⁴⁴ The investigation revealed links between the JBS Lins slaughter plant and several direct and indirect cattle companies involved in deforestation and illegal activities in the Brazilian Amazon. For one of the cattle farms highlighted in that study, the Bonanza company in Altamira (Para) with an area of 2,200 hectares, AidEnvironment identified a recent logging of 207 hectares of Amazonian vegetation in 2022 and 2023. This company is indirectly linked to JBS Lins. The owner of Bonanza also owns Estância Painera, and moves animals between his cattle farms. From Estância Painera, deliveries were made to the Santa Lúcia farm, located in Espírito Santo do Turvo (SP), near Lins. Repórter Brasil revealed that Santa Lúcia supplied cattle to JBS Lins facility between 2019 and 2021.

Supply chain of product SD-DE-AMS-4



Origin and transparency

The packaging of Jack Link's beef jerky states that the product comes from Brazil, but this is not the case for the Bifi and beef bar. World Animal Protection asked consumers about the origin of Jack Link's products at several supermarkets in the Netherlands. None of the supermarkets offering the products wanted to give a definitive answer, all referred to the producer:



Manufacturer's response:

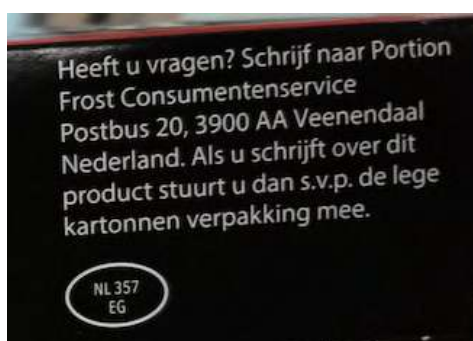
Because Brazil is among the countries that have European Union approval to export beef to, the producer's response implies that actual Brazilian beef can be used for production. There was no further answer to our specific question about whether actual beef from Brazil is used, which means that the producer did not use the opportunity to deny that Brazilian beef can be used for production. All this shows that there is no transparency for consumers and that even the offering supermarkets do not know where the meat comes from.



Case G: Frozen beef products in Makro, Hanos and Vomar linked to Zandbergen group importing from JBS

This case study focuses on the non-transparency of the origin of these products. We cover three products in this case study, but in total, AidEnvironment photographed 15 products. In addition, we will zoom in on labeling and origin of the products.

Beef Steak (frozen product). No slaughter date on package.



Source: Mystery shopping; Vomar Amsterdam; Gulden Winkelplantsoen 13-17, 1055 EK Amsterdam; 12 July 2023. Ref: MG-VO-AMS-07.

Beef Carpaccio (frozen product). No slaughter date on package.



Source: Mystery shopping; Hanos Utrecht; Ravenswade 94, 3439 LD Nieuwegein; 18 August 2023. Ref: RR-HAN-UTR-14

Beef tenderloin tips (frozen product). No slaughter date on package.



Source: Mystery shopping; Makro Delft; Schieweg 104, Delft, Zuid-Holland, 2627 AR; 3 July 2023. Ref: RR-MAK-DLFT-14

Linked companies:



Company importing: Zandbergen group

Although this case cannot be linked to a specific JBS slaughterhouse, a link between JBS beef products and Zandbergen-related products has been found at several wholesalers and a supermarket Van Zandbergen reports that it supports private labels for "Aldi, Albert Heijn, Rewe, Carrefour and DekaMarkt⁴⁵, among others". AidEnvironment cannot prove a direct link between these 15 frozen food products, which are linked to Zandbergen Group by an EC number, and JBS. Shipping records, however, show a clear link between JBS's supply chain and Zandbergen. According to shipment data, Zandbergen Group (under the trade names Jan Zandbergen and Meat Import Zandbergen Brothers) imported 889 tons of frozen and fresh beef products from JBS between January 1, 2021 and July 28, 2023, with a total value of an estimated \$4,918,600. Of the total quantity, 208 MT (worth USD 1 295 600) were fresh/chilled beef products (HS 0201) and 681 MT (worth USD 3 623 000) were frozen beef products (HS 0202). The burden of proof that these meat products, with a possible origin in JBS slaughterhouses that could be linked to deforestation, is with Zandbergen Group and JBs.

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