

GROUPE CASINO

ECO RESPONSABLE

DE LA DÉFORESTATION





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## I. SUMMARY

**B**razil and Colombia share a unique environmental status. They hold, respectively, **the first and second largest part of the world's biodiversity and are therefore classified as « megadiverse countries».**

At the same time, both sit at the top of the depressing table for deforestation: they had the first and fourth highest rates of rainforest destruction in the world for 2018 and for previous years, they also hold the deadly record of the highest number of environmental activist murders. For these reasons, in order to protect environmental defenders, some sources for this report are not revealed.

In these two countries, cattle ranching is the main cause of deforestation. It is responsible for 80 percent of the deforestation in the Brazilian Cerrado and Amazon Biome, and 70 percent of deforestation in Colombia.

Last but not least, **in these two countries**, a prestigious French group is the number one retailer: **Casino Group**. The group holds **15 percent market share** in Brazil with Grupo Pão de Açúcar (GPA) and 43 percent in Colombia with Éxito.

Envol Vert, a French organisation based in South America together with several local NGO partners, decided to investigate Casino Group's beef supply chain in Brazil and to better understand beef market traceability in Colombia.

In Brazil, after **one year of investigation**, Envol Vert can demonstrate for the first time the

existence of strong links between **4 farms involved in illegal deforestation** and meat products sold through Casino Group supermarkets across the country. In these farms, it has been calculated that 4`497 hectares of deforestation for conversion to cattle pasture are linked to the beef supply chain of the group. The meat from these farms, directly or indirectly connected with abattoirs that supply Casino Group, is sold as **fresh meat in 2 stores**, and is found in **54 meat products present in 10 stores**.

Besides this, one of the farms identified in Casino Group's supply chain is found to be **responsible for the destruction of forest** in the Arapytewa indigenous reserve. The deforested area of this protected reserve more than quadrupled last year.

The investigation also revealed connections between abattoirs supplying Casino Group's stores and farms involved in deforestation as per the Mighty Earth's Rapid Response cattle reports. This is not the first time that Casino Group practices have been highlighted: in 2019 Chain Reaction Research found links between 5 high-risk abattoirs (identified by Imazon) and Casino Group. In 2020, Media-part found that at least one JBS plant supplying GPA/Casino was still destroying the Amazon rainforest.

Such findings serve as evidence that **Casino Group does not address the key issue of indirect farms** (farms that are further upstream in the supply chain) and **does not provide suf**



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Such findings serve as evidence that **Casino Group does not address the key issue of indirect farms** (farms that are further upstream in the supply chain) and **does not provide sufficient safeguards against the direct farms' practices**. As a result, the Group fails to comply with the commitments of its action plan as part of the legislative act n°2017-399 of 27 March 2017 regarding the duty of vigilance of parent companies and subsidiaries.

## LIST OF ABBREVIATIONS AND GLOSSARY

**ABIEC** : Associação Brasileira das Indústrias Exportadoras de Carnes (Brazilian association of beef exporting companies).

**Land grabbing** : land acquisition by domestic and transnational companies, governments, and individuals, by legal or illegal means - including persuasive techniques or dispossession - in order to develop agriculture for bioenergy, industrial material, human food and animal feed, as well as pasture, forest plantations, minerals and hydrocarbon extraction and hydroelectric plants. The growing demand for land has attracted investor interest and price increases have turned land into a lucrative asset for property speculation. At the same time land use changes have degraded the environment with conversion of forest to pasture.

**Legal Amazon** : region covering the states of Acre, Pará, Amazonas, Roraima, Rondônia, Amapá and Mato Grosso and the areas in the north of 13° S Latitude in the states of Tocantins and Goiás, and at the west of the 44° W Meridian, state of Maranhão.

**APP Permanent Preserved Area** : protected areas, with or without natural vegetation cover, whose environmental objectives are to preserve water resources, nature, biodiversity, to help the genetic flow between populations of flora and fauna and ensure the well-being of human populations.

**CAR** : Cadastro Ambiental Rural (Rural Environmental Registry).

**DEU** : Document d'Enregistrement Universel (Universal Registration Document).

**Indirect Farm** : unlike a direct farm that supplies abattoirs without intermediaries, the indirect farm supplies the direct farm or other indirect farms.

**FUNAI** : Fundação Nacional do Índio (National Indian Foundation).

**FARC** : Fuerzas Armadas Revolucionarias de Colombia (Revolutionary Armed Forces of Colombia).

**GRSB** : Global Roundtable for Sustainable Beef.



**GTPS** : Grupo de Trabalho da Pecuária Sustentável (Sustainable Farming Working Group).

**IBAMA** : Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis (Brazilian Institute of Environment and Renewable Natural Resources).

**ICA** : Instituto Colombiano Agropecuario (Colombian Agricultural and Livestock Institute).

**MPF** : Ministério Público Federal (Federal Prosecution Service).

**Megadiverse countries** : group of countries that harbour the majority of the Earth's plant and animal species and are therefore considered as the richest countries in terms of biodiversity.

**Legal reserves** : portions of land located inside a private or rural property that ensure sustainable economic use of natural resources, support conservation and provision of ecological processes, and promote conservation of native fauna and flora.

**SICAR** : Sistema Nacional de Cadastro Ambiental Rural (National Rural Land Registration System).

**SISBOV** : Serviço Brasileiro de Rastreabilidade da Cadeia Produtiva de Bovinos e Bubalinos (Brazilian System of Bovine and Bubaline Identification and Origin Certification).

**TAC** : Termo de Ajustamento de Conduta (Conduct Adjustment Terms).

## II. INTRODUCTION: NO EXCUSE IN 2020 FOR NOT PROTECTING THE REMAINING FORESTS IN THE WORLD'S MOST BIODIVERSE COUNTRIES

In Colombia, the existing local system cannot track livestock from birth to plate. Animals go through several farms and are mixed in a batch with animals from other farms before leaving the farm. As a result, the large number of intermediaries in the process makes the traceability complicated. Besides this, intermediaries are not recorded, and it is therefore impossible to know the farming conditions and their impact on deforestation. **Despite its leading position in the country, Éxito/Casino does not provide any guarantee** that the meat distributed in its stores is not purchased from farms involved in deforestation.

Casino Group has applied a policy of inconsistent double standards: it is the leader of the organic food market in France and the **first retailer to launch all-vegan and organic stores in Paris**; at the same time it is also responsible for environmental damage in South America where it generated the greatest share of its turnover (47%) for the first time in 2019 with

sales growth of 9.2 percent.

**South America: a great deal for Casino, but not for the forest!**

Thanks to new technologies, efficient solutions do exist, and Casino Group has no excuse for failing to ensure the full traceability of the meat it distributes, including cattle coming from indirect farms, to guarantee zero-deforestation practices in its supply chain.

As a French company with more than 5000 employees, Casino Group must fulfil its **obligations under the corporate duty of vigilance law for parent companies**. However, its action plan remains incomplete: it does not take into consideration indirect farms nor Colombia. It is also insufficient as it delegates to suppliers the responsibility for monitoring traceability. Risk mapping should have led to the implementation of a stronger corporate policy against deforestation. Nevertheless, the result is the opposite. Casino Group's potential contribution to deforestation has been estimated by Envol Vert: based on its market share in Brazil, 56000 hectares may have been deforested by its direct or indirect suppliers and this figure covers the Brazilian Amazon only. This is the equivalent to 5 times the surface area of Paris.

In this context, there is definitely a **lack of monitoring and consistency in the measures taken**, leading to several deforestation cases – illegal it has to be said – within the beef supply chain of Casino Group in Brazil.

Brazil is the **chief driver of deforestation** (according to WRI and FAO) and the official figures drastically increased last year. According to INPE, the Brazilian Amazon lost 10 123 km<sup>2</sup> (almost 100 times the surface of Paris) in 2019 which is 44% higher than in 2018 (PRODES (Desmatamento), 2020). The situation has become even worse since then: between August 2019 and May 2020, deforestation rates have increased by 73 percent compared to the same period the previous year (PRODES (Desmatamento), 2020) resulting in deforestation of a total surface of 6 309 km<sup>2</sup> during this 10-month period (PRODES (Desmatamento), 2020).

Last but not least, the number of fires detected in the Brazilian Legal Amazon<sup>1</sup> rose by 71 percent between 2018 and 2019 (INPE, 2020b).ques Tropicales, 2019).

## B. INVESTIGATION OF DEFORESTATION CASES IN CASINO GROUP'S BEEF SUPPLY CHAIN

The active role of livestock farming in Brazilian deforestation was historically supported by many national programs willing to integrate the Amazon with the rest of the country. In fact, the first step in the process of colonisation was to occupy the land with cattle. To promote this integration, Brazil has also developed the Trans-Amazonian Highway for

example (Fearnside, 2005). 52 percent of the original area of The Cerrado has disappeared or has been deeply affected (MAPBIOMA, 2017) and the Amazon has lost 20 percent of its forests (WWF). **The responsibility of livestock farming is 80 percent in both cases** (Yale University, 2020).

According to IDEAM (Institute of Hydrology, Meteorology and Environmental Studies), 70 percent of deforestation was caused by conversion to pasture and extensive livestock farming between 2016 and 2017. During this period, deforestation increased by 23 percent (Fundacion Natura Colombia and CDP, 2018).

Based on such critical findings, Envol Vert, a French NGO operating in South America, received strong support from local organizations to investigate the beef sector in Brazil. We were requested to pressure French companies to improve their vigilance action plan and implement it in an effective way. However, the security risk is becoming high in these countries; according to different sources, during the last two years, Brazil and Colombia were the countries with the first and second highest number of environmental activists killed (Front Lines Defenders, 2019).

Envol Vert, as an active player in the preservation of forests, has decided to investigate the French Casino Group, a multinational company operating in both Colombia and Brazil. The objective is to determine whether the Group distributes meat products somehow linked to deforestation via its operations in South

America (Casino Group, 2020a) and its supply chain. Casino Group's slogan is "nourishing a world of diversity" and as one of the largest distributors in megadiverse countries, it should embody this message and show respect to biodiversity.

## C. MANY ANTI-DEFORESTATION STRATEGIES BUT POOR RESULTS IN THE FIELD

Over the past few years, various strategies have been implemented in order to combat deforestation. These started with market-based solutions such as certifications (Lima et al., 2006) and have continued with global voluntary commitments such as the New York declaration. The objective of this agreement was **to halve tropical deforestation by 2020 and end it completely by 2030** (New York Declaration on Forest, 2014). Five years later, there is little evidence to show the process is under way and the 2020 target seems unreachable (Schulte et al., 2019).

In June 2019, an NGO consortium together with the support of key stakeholders (Natural Wildlife Federation, World Wildlife Fund, Rainforest Alliance) released the first version of the Accountability Framework Initiative: a set of common standards and guidelines to implement and follow up ethical commitments made by companies to monitor their supply chain (Accountability Framework Initiative, 2016).

We are in the 21st century, there are many existing tools and technical solutions to help companies stop sourcing from suppliers responsible for forest destruction. Global Forest Watch (Global Forest Watch, 2020b) provides monitoring of deforestation and fire alerts in the supply chain; Trase (Trase, 2020) ensures the traceability of products from municipalities to ports; Visipec (National Wildlife Federation, 2020) provides information on indirect farms in most deforested Brazilian states. There is also a monthly alert system created by Mighty Earth to identify deforestation in farms and associated abattoirs (Mighty Earth, 2020).

However, despite all these solutions and all the tools available, companies must face up to reality: deforestation is increasing in the most biodiverse countries (Weisse and Dow Goldman, 2019).

<sup>1</sup> See definition page 5



Source: Envol Vert

**Infographic 1 :** Risks in case of excessive deforestation  
Source : Envol Vert

Commitments are made, solutions exist, but results are not improving. What is missing is the will.

Envol Vert does not accept any more global commitments without the specification of **concrete binding actions** to be implemented by the stakeholders who are most responsible for deforestation.

### D. DUTY OF VIGILANCE OR HOW TO MAKE SURE LEGALLY THAT “SUSTAINABLE COMMITMENTS” MEAN “SUSTAINABLE RESULTS”

In France there is an unprecedented legislation, the “duty of vigilance” or “duty of care” (French Government, 2017) (LOI n°2017-399). For the first time, national legislation addresses the harmful impact of multinational companies on human rights and the environment including deforestation, creating binding obligations for companies, and providing judicial avenues for victims. The parent companies shall prevent and remediate human rights abuses and environmental violations in their supply chain. This act is applicable to all their subsidiaries, their suppliers and all over the world.



## III. CATTLE SECTOR, MAIN DRIVER OF BRAZILIAN DEFORESTATION

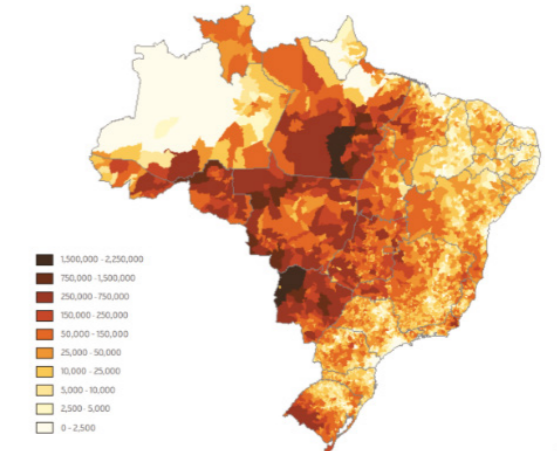
### A. HUGE PRODUCTION FOR LOCAL CONSUMPTION

#### A.1. PRODUCTION INCREASINGLY LOCATED WITHIN THE AMAZON

According to the 2020 annual beef report produced by ABIEC (Brazilian Beef Exporters Association) and providing overview data of the beef sector, Brazil is the second largest producer of beef in the world, right behind the United States, with a production in 2019 of 10.49 million tons of beef in Carcass Weight Equivalent (CWE). It is also the N°1 beef product exporting country with 17.43 percent of the world’s exports (ABIEC, 2020).

The beef sector is a major economic activity in Brazil accounting for 8.5 percent of the total Gross Domestic Product (GDP) (ABIEC, 2020). Moreover the Brazilian cattle herd has increased a lot in the past decades, from 158 million head in 1994 (Kuepper et al., 2018) to almost 214 million in 2019 (ABIEC, 2020). Map 1 (see below) indicates the main areas for cattle farming; they are located in the centre of the country. However, it should be noted they have shifted towards the centre of the Amazon over the years. 54.35 percent of livestock is concentrated in 5 states: Mato Gross Goiás,

Mato Grosso do Sul, Minas Gerais and Pará. But the states with the largest increase in their livestock during the last decade are Amazonian: Roraima (67,77%), Pará (21,67%) and Rondônia (21,16%) (ABIEC, 2020).



**Map 1:** Concentration of the cattle herd in the different states and municipalities of Brazil in 2019  
Source : ABIEC, 2020 beef report

In addition, researchers found cattle farming expanded further north in the legal Amazon (see glossary) during the period from 1974 to 2011 (McManus et al., 2016) and that 99 abattoirs could purchase from 390`000 cattle farms holding 93 percent of the Amazonian cattle herd (Barreto and Pereira, 2017).

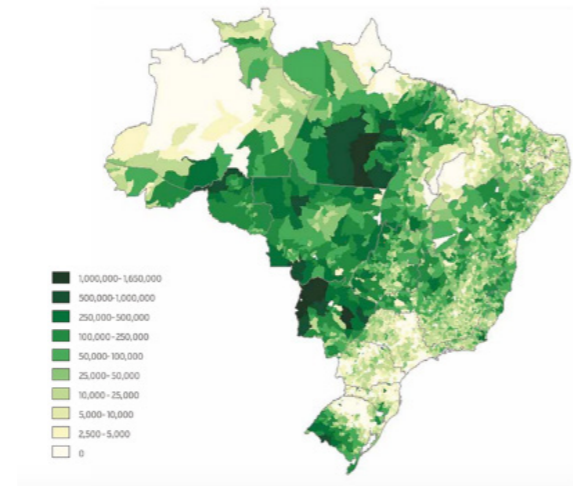


## A.2. STRONG DOMESTIC DEMAND SATISFIED BY BIG RETAILERS

The Brazilian association of beef exporters declares that 76.3 percent of beef produced in 2019 is consumed locally; this represents a global consumption per capita of more than 38 kilograms per year (ABIEC, 2020) ranking the country as the second largest consumer of beef in the world.

Beef includes fresh meat (80%), processed meat (12%), and offal or other (8%) (ABIEC, 2020) and is mainly sold through big retailers who control around 80 percent of the Brazilian market according to the United States Department of Agriculture (USDA Foreign Agricultural Service, 2019).

As we can see there is a very high correlation between the two and the maps confirm once again the significant presence of cattle in the Amazon Biome.

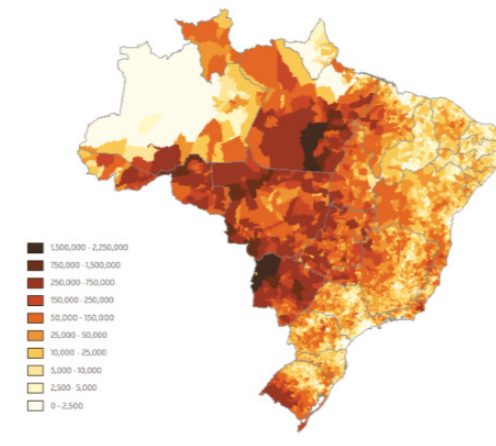


Distribution of pasture land

## B. CATTLE SECTOR LEADS THE WAY IN THE DYNAMICS OF DEFORESTATION

### B.1. RESPONSIBILITY OF THE CATTLE SECTOR FOR DEFORESTATION

The main cause of deforestation in the world is the extensive agriculture for commercial and subsistence purposes (Curtis et al., 2018) and in South America, it is the beef sector in particular that drives deforestation. In Brazil, the percentage of deforestation attributed to cattle farming is estimated at 63 percent (Butler, 2020). To obtain more land for pasture, forest is cut down at a really fast rate.



Distribution of bovine livestock

Map 2: Distribution of pasture land and bovine livestock per municipality  
Source : ABIEC ; 2019

Below is a graphic showing the distribution of pasture land in Brazil in 2018, together with the distribution of livestock in the country.

## B.2. BEEF SUPPLY CHAIN IN BRAZIL

Each member in the supply chain from cattle farmers to final consumers are actors (Gibbs et al., 2016, Barreto and Pereira, 2017, Kuepper et al., 2018) and thus carry a share of responsibility for deforestation in the Amazon (see below)

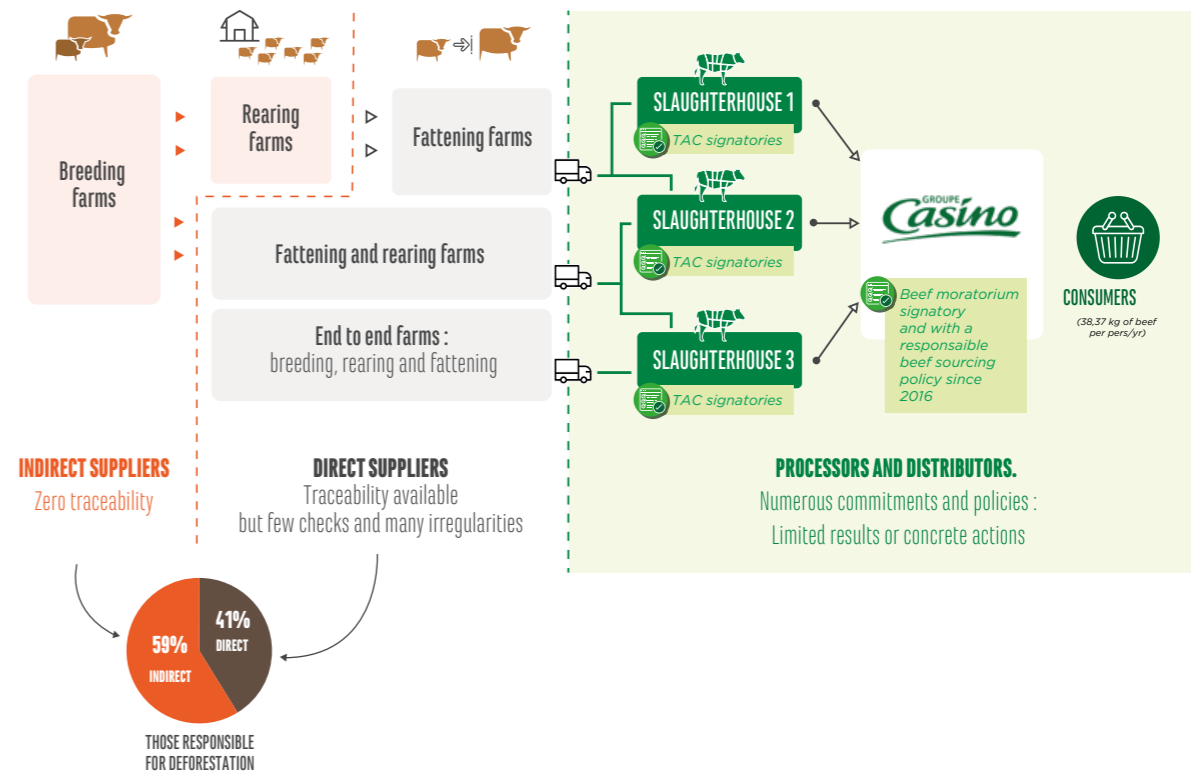
The beef supply chain can be divided into two parts:

1. Cattle raising for slaughter, including breeding, rearing and fattening farms
2. Meat processing and distribution,

including meatpackers and retailers

The graphic below also reflects the lack of control of the beef supply chain by industrials: **traceability control is actually limited to direct suppliers only.** Indeed, indirect farms are not mentioned in any commitment taken by industrials (Marfrig, 2010, JBS, 2013, GPA, 2016) although it is stated in the 2018 report from Chain Reaction Research that cattle may spend up to 75 percent of their lives on indirect farms (Kuepper et al., 2018).

## DEFORESTATION CAUSED THROUGHOUT THE CASINO GROUP BEEF SUPPLY CHAIN



Infographic 2 : Beef supply chain complexity  
Source : Envol Vert

### B.3 KEY ABATTOIRS DRIVE THE BEEF SECTOR

In the supply chain, the link between production and processing / distribution is monitored by the meatpacking plants. There are 130 active abattoirs in the Legal Amazon representing more than 90 percent of the total slaughter capacity (Kuepper et al., 2018). They are registered at a municipal, federal, or state level and are subject to sanitary inspections from the relevant administration body such as the

SIF (Federal Inspection Service) (Barreto and Pereira, 2017).

This key activity in the beef supply chain is controlled by three big companies (JBS, Marfrig and Minerva) that control 70 percent of the total slaughter capacity in the Legal Amazon (Kuepper et al., 2018). These players have strong leverage over the supply chain and thus on deforestation.

	<p>JBS is a Brazilian company, the largest meat company in Brazil and one of the worldwide food industry leaders. JBS is present in 15 countries and achieved a turnover of 44 billion R\$ (around 7.89 billion euro). Its slaughter capacity in the Legal Amazon was around 34`240 animals per day in 2018 (Kuepper et al., 2018).</p>
	<p>Marfrig is the second biggest meatpacker present in the Amazon with a slaughter capacity of 11`800 animals per day (Kuepper et al., 2018).</p>
	<p>Minerva is the third biggest meatpacker present in the Amazon with a slaughter capacity of 10`000 animals per day (Kuepper et al., 2018).</p>

Table 1: Three main meatpackers in Brazil  
Source: Envol Vert

These companies are well aware of the high deforestation risk within their supply chain as it has been stressed and published several times by NGOs since 2009 (Greenpeace, 2015, Hurowitz et al., 2019) and lawsuits have already been initiated against farmers to fight

against deforestation practices (Locatelli and Aranha, 2017). In fact, these companies have taken some commitments to limit deforestation in their activities in order to protect themselves from reputational risk and financial risk. A survey by the NGO Imazon found in 2018

that around 70 percent of the beef coming from farms located in the Legal Amazon is processed in meatpacking plants that have signed settlement agreements against deforestation (Barreto and Pereira, 2017). The main agreements are the TAC (Conduct Adjustment Terms) to be signed with the Federal Public Prosecution Service (MPF) and a public commitment with Greenpeace on the minimum criteria for industrial beef operations in the Brazilian Amazon (Greenpeace, 2009). These agreements are as a result of MPF lawsuits against the four largest meatpackers (JBS, Marfrig, Minerva et Bertin) and from a public campaign launched by Greenpeace (Locatelli and Aranha, 2017).

### B.4. MISMATCH BETWEEN AGREEMENTS AND DEFORESTATION REALITY

Deforestation in the Amazon and other biomes in Brazil is caused by the clearing of land to create pasture land (FAO, 2011). As a result, deforestation is present in the beef supply chain as soon as cattle are free to pasture on large deforested areas.

First of all, 30 percent of the abattoirs located in the Legal Amazon have not signed any agreement and are de facto responsible for part of this deforestation (Barreto and Pereira, 2017).

**However,** companies having signed the TAC agreement (around 70%) may also be involved in forest destruction (Kuepper et al., 2018), either with **laundering mechanisms or through their indirect suppliers.**

Mighty Earth (Mighty Earth, 2020) proved the link between some recent deforestation and the major meatpackers although agree-

ments were signed. For example, Marfrig, Minerva, JBS and Naturafrig were involved in the deforestation of 1`522 hectares in Mato Grosso since 2018 (Mighty Earth, 2019). However, these companies did sign the TAC agreement with the Federal Public Prosecution Service. As a result, the **TAC agreement is clearly not a satisfactory agreement to combat deforestation.**

The TAC agreement is a bilateral legal commitment allowing direct sanctions, if not respected, without court proceedings. Meatpackers who have signed the TAC agreement (Marfrig, 2010, JBS, 2013) are committed to:

Ceasing cattle purchases from direct farms if they discover evidence of:

- Location in embargoed areas (the list is available on several websites such as IBAMA or from the Federal Environment Agencies)
- Illegal deforestation post 2009
- Slave labour
- Invasion of indigenous land
- Legal proceedings for land grabbing
- Purchasing cattle only from ranches that are:

- Registered with the Rural Environmental Registry (CAR - Cadastro Ambiental Rural)
- Able to supply the Animal Transit Guide (GTA - Guia de trânsito animal)

Despite the precautions, the TAC agreement is not sufficient to fight against deforestation for two major reasons:

**First,** it has been proved that farmers are able to bypass embargoes using laundering mechanisms (Gibbs et al., 2016, Barreto and Pereira, 2017). For example, ranchers rent embargoed ranches to other ranchers who do have a

proper registration and are not in embargoed areas (Barreto and Pereira, 2017). The latter are authorized to sell their cattle to abattoirs even if part of it comes from illegal ranching.

**Second**, deforestation is more present in indirect farms that operate without any commitment to monitor their supply chain; there is no traceability from where the cattle were born to the fattening farms. These fattening farms also receive cattle from illegal ranches which are then mixed with other animals and sold to different abattoirs and thus retailers.

The National Wildlife Federation states that **59 percent** of the deforestation in the Brazilian beef supply chain is located in indirect farms (National Wildlife Federation, 2020). The dynamics of the cattle sector can be explained by the high profitability of the beef industry. It is true to say that when a sector is promising and offers significant economic opportunities, it attracts more and more new players. It is all the more true when there are public policies encouraging this specific sector. This is what has been happening to the cattle sector in Brazil since 1970 (McManus et al., 2016). One of the consequences is that land speculation and land grabbing have become important factors for extensive cattle ranch profitability (Bowman et al., 2012).

### C. KEY RESPONSIBILITY FOR CATTLE RETAILER

**R**etailers are the key beef sales channel in Brazil. A study carried out in 2019 by the USDA showed that retailers capture most of the product distribution in the country. For food, they account for 80 percent of distribution (USDA Foreign Agricultural Service, 2019).

As they represent the consumers, the retail sector has a strong impact and leverage on the overall supply chain. This effect is also reinforced by the fact that the market is controlled by three big retailers representing around 38 percent of the market in Brazil (USDA Foreign Agricultural Service, 2019). *See table 2 opposite.*

Own label or store brands is a growing trend in the retail sector. In Brazil, the market share of own label brands has more than doubled from 2015 to 2018<sup>1</sup> (ABRAS, 2019) leading to a stronger power of retailers to influence the future of the cattle sector. As part of these changes, the retail sector has taken some commitments to monitor the supply chain and prevent deforestation: *See table 3 opposite.*

<sup>1</sup> From 2.7% in 2015 to 6% in 2018

	<p>Carrefour, a French distribution group created in 1959 (Carrefour Group, 2020) has been operating in Brazil since 1975 and now leads the distribution sector with a turnover in Brazil of 56 million R\$ in 2018.</p>
	<p>Grupo Pão de Açúcar (GPA), is a subsidiary of the French Casino Group created in 1898 (Casino Group, 2020c). Casino Group took effective control of GPA's operations in Brazil in 2012 together with GPA's other stores operating under three other brands: Assaí, Extra and Pão de Açúcar, and became one of the leading mass-retailers in South America. With a turnover of 53 million R\$ in 2018, GPA is a leading mass-retailer and the 1st retailer in Brazil according to its 2019 annual report (Casino Group, 2019b).</p>
	<p>Grupo Big, ex-Walmart, is one of the world's biggest retailers and is also present in Brazil. Its turnover in 2018 is not available but reached 28.2 million R\$ in 2017 (USDA Foreign Agricultural Service, 2019).</p>

**Table 2 :** The three main Brazilian retailers  
**Source :** ABRAS, 2019

<p><b>Public commitment as per the Greenpeace cattle agreement (Greenpeace, 2009) : Minimum Criteria for Industrial Scale Cattle Operations in the Brazilian Amazon Biome.</b></p>	<ol style="list-style-type: none"> <li>1. Zero deforestation in the supply chain:             <ul style="list-style-type: none"> <li>- exclude direct suppliers involved in the deforestation of the Amazon Biome since the reference date of the agreement</li> <li>- exclude indirect suppliers involved in the deforestation of the Amazon Biome within a period of 2 years after the reference date of the agreement</li> </ul> </li> <li>2. Exclude suppliers involved in the invasion of indigenous land and protected areas</li> <li>3. Exclude suppliers with slavery practices / forced labour</li> <li>4. Exclude suppliers involved in land grabbing or land conflicts</li> <li>5. Implement a tracking system to monitor traceability in the supply chain</li> <li>6. Inform suppliers of requirements and of blacklisting in case of non-compliance</li> </ol>
<p><b>The Cerrado Manifesto (Manifesto do Cerrado, 2017)</b></p>	<p>The Cerrado Manifesto is a document signed by Casino Group/GPA in 2017 (GPA, 2017) and several multinational companies. It is a commitment to take action and find concrete solutions to stop deforestation in The Cerrado biome which is significantly impacted by agrobusiness development, in particular by the beef and soybean industries.</p>

**Table 3 :** Main commitments in the cattle sector  
**Source :** Envol Vert according to public documents

## D. DIFFERENT TOOLS FOR TRACING ANIMALS BACK TO INDIRECT FARMS

In Brazil different tools have been developed to provide information on animals, farms and farmers. These tools can help to implement traceability in the supply chain. In general, they are publicly available but not easily accessible sometimes.

The rural land registry **CAR (Cadastro Ambiental Rural)** (SICAR, 2020) aims at re-grouping in a publicly accessible site, the information on every rural property in the country such as permanent preserved areas and legal reserves. Its objective is to control and monitor in-country environmental and economic planning. It also ensures compliance with Brazil's Forestry Code and is therefore a great help in fighting deforestation.

The first step is, for every owner of rural property, to register himself and the property in the system. This registration is a mandatory condition for many government services, for example, it is required if applying for public financing. The specific legislation of CAR is that an owner with two contiguous properties must be registered with a sole and unique CAR registration number (Ministerio do Meio Ambiente, 2014) and this regulation can prevent laundering mechanisms that obscure the origin of cattle.

The second tool available for traceability is the **GTA, "Guia do Trânsito Animal"**. This is a key

document for the regulation of cattle transactions. It records operational data such as, date, volume of cattle (with age, weight, race, etc.) as well as place of origin, place of destination, and details of the parties involved (seller, buyer). One of the main drawbacks of this tool is it keeps no record of the previous farm from which the herd may originate. It only shows the last place of transit, most usually the fattening farm, and cannot ensure full traceability of the supply chain. This public tool is supposed to be readily available through dedicated platforms (Ministério da Agricultura, Pecuária e Abastecimento, 2020); however local NGOs require easy and full access to the whole database for better monitoring. It would be possible to control contamination for example and protect the herd from contamination by animals coming from indirect farms presenting irregularities. Unfortunately, access to full information is blocked at sector level.

The different **official lists from the government** are another tool to check illegal or irregular owners and properties. These lists record and preserve the identification numbers of owners (and properties) who:

- Have failed to respect an environmental regulation (mainly regarding deforestation)
- Have part or all their property overlapping protected areas (APP or legal reserve) or official indigenous land
- Are concerned by slavery or forced labour practices

In such cases, farms are embargoed. These blacklists are publicly available on various web-

sites such as IBAMA's (Ibama, 2020b). When a farm or owner is blacklisted, no transaction is possible with other farmers, abattoirs or retailers and no financing is possible until the irregularities are cleared or offset (Governo brasileiro, 2012).

Finally, there are some other tools developed at national and international level in order to track deforestation around the world.

**PRODES** (Measurement of Deforestation by Remote sensing) is the official Brazilian tool to monitor deforestation on Brazilian territory. It uses Landsat satellite imagery to track down deforestation with a spatial resolution of less than 250m (INPE, 2020a).

**Global Forest Watch** is an online platform launched in 2014 that shares data and tools to track not only deforestation but also fires. Founded by the World Resource Institute, it uses numerous satellites imagery (such as the LandSat one or the MODIS system) (World Resources Institute, 2020) and potential alerts from all users via a collaborative alert system. Unlike PRODES, this tool presents the variation in forest cover over time (with different thresholds) (Global Forest Watch, 2020a). This delivers better monitoring of forest degradation.

There is a consensus between numerous players that these and other tools are key to obtain efficient monitoring of the cattle sector. Indeed, these tools could help track deforestation from indirect farms up to the final products. Thanks to the GTA, it is possible to know the last origin of the cattle and their CAR

registration number. This information crossed with the various lists presented above give a good overview of the legality or illegality of the transaction (Gibbs et al., 2016, Barreto and Pereira, 2017, Kuepper et al., 2018, National Wildlife Federation, 2020).

### D.1. VISIPEC, AN EXISTING TOOL COVERING INDIRECT FARMS

The issue of indirect suppliers is well known by all the stakeholders (Greenpeace, 2009) some willing to address it, others less eager to work on it. A working group composed of various stakeholders (farmers, abattoirs, meatpackers, retailers, NGOs) called the GTFI (Grupo de Trabalho do Fornecedores Indiretos) is looking into this issue in order to develop concrete solutions (National Wildlife Federation, 2020). Without success.

The current monitoring system only covers 41 percent of deforestation due to cattle farming in the Brazilian Amazon. Visipec, developed by the GTFI group, can extend monitoring to T1 indirect suppliers in order to cover an additional 48 percent of deforestation (National Wildlife Federation, 2020). This is only possible if the two sources of information (CAR - Cadastral Registration and GTA - Animal Transit Guide) are crosschecked.

This tool was mainly dedicated for meatpacking companies in Brazil. Information on indirect farms can be crosschecked against blacklists from the government in order to update data on legal supplies in the chain. It is not mandatory, but it is free (National Wildlife Federation, 2020). Thus, it is very easy to implement

but strongly depends on the goodwill of the **meatpackers and on the demands of the retail sector**. It has been expanded to include the three main regions (Rondônia, Pará and Mato Grosso) currently at the deforestation front. This tool or any future equivalent shows that it is possible to trace back to indirect suppliers and correctly monitor deforestation.

## D.2. BEEF CERTIFICATION, AN EFFICIENT BUT NEGLECTED SOLUTION

Due to mad cow disease, the European Union implemented in 2002 a voluntary-based certification, since then only fresh meat with certification can be exported to the EU. The SISBOV (Brazilian System of Identification and Certification of Bovine and Bubaline Origin) certification allows the product to be traced back to the animal thanks to a segregation method in the various processes (mainly abattoirs). This program tracks each animal, sourcing back to the farm where it was born. Thus, it allows a full traceability in the supply chain and a better control. This traceability together with deforestation management tools on the registered farms is an efficient solution to fight against deforestation. However in 2015, only 0.5 percent of farms with more than 50 heads were SISBOV certified (Kuepper et al., 2018).

## D.3. OTHER WORKING GROUPS

### GRSB (Global Roundtable on Sustainable Beef):

Created in 2012, this roundtable is an international multi stakeholder platform aiming to define and develop sustainable beef farming. It defines sustainable beef as socially responsible, economically viable and environmentally sound viable products. It consists of various groups including farmers, retailers (McDonald's), meatpackers (JBS), NGOs (WWF, Rainforest Alliance) as well as other national roundtables (GTPS).

### GTPS (Grupo de Trabalho da Pecuária Sustentável):

This task force, created in 2008 in Brazil, focuses on continuous improvement of the value chain in the beef sector. Mainly through the implementation in the farms and abattoirs of a platform for exchange (GTPS, 2017) and a guide on "sustainable beef" GIPS (Guia de Indicadores de Pecuária Sustentável).

According to local partners, these working groups are not implementing concrete actions for change although they do have strong leverage on all stakeholders and in particular on the government.



## D.4. THREATENING OR THREATENED GOVERNMENT INITIATIVES

Government regulations can have a significant impact on deforestation. For example, the amendment of the Brazilian Forest Code in 2012 has led to less pressure on land grabbers. A high increase in deforestation resulted from this change (PRODES (Desmatamento), 2020) as well as a reduction of the surface of protected areas (Asher, 2019).

But some initiatives of the government can also help halt deforestation. It was for example the case when the decision was made to make the GTA (Guia de Trânsito Animal) publicly available. Unfortunately, the implementation of this regulation made no progress since then. In 2018 some MPF regional prosecutor's offices have officially issued recommendations to State governments requesting them to make GTA publicly available through an online transparent research mechanism.

Some recent actions from the government show a strong will to protect offenders instead of halting deforestation. For example, the MP-910 (Brandford and Borges, 2019) decree allows people who illegally logged or squatted on protected federal lands to purchase such lands at a reduced price thereby legalizing "land grabbing". **In other words, a permit for deforestation.**

First rejected by the Brazilian congress, this decree is back on the table and a new law (PL-2633-20) (Fearnside, 2020) now grants titles on the strength of mere self-declaration.

## D.5 TOWARDS MORE INTENSIVE FARMING, AN OPPORTUNITY TO DISCONNECT BEEF AND DEFORESTATION?

A solution supported by many actors and scientists is to increase yields. Indeed, the actual yield in the cattle sector is around 1.31 head per hectare which is considered as low (ABIEC, 2020).

Basically, yield increase focuses on increasing the number of animals per hectare and thus reducing the surface of pasture needed for the Brazilian herd (Cohn et al., 2014). This solution for more intensive cattle ranching would reduce the pasture area required while maintaining the same productivity; it would lead to less pressure on ecosystems threatened by deforestation. This solution has pros and cons: high risk of non-respect of animal welfare, increase in pollution (Vale et al., 2019) and increase in livestock production in the country.

Having said that, Envol Vert encourages an alternative solution combining sustainable cattle ranching and sustainable forestry, namely silvipastoralism. Silvopasture practices integrate trees, pasture and forage and take into consideration environment protection, animal welfare, resilience of the ecosystem and farmers thanks to the additional business activity it generates. If this method is well implemented, it can also give higher yields for cattle ranchers.

In all cases, these different solutions will really protect the environment - and in particular the forest - only if they are also **supported by a significant reduction in meat consumption.**

## IV. IN COLOMBIA, IT IS IMPOSSIBLE TO KNOW WHERE THE BEEF IS FROM

### A. WHEN DEFORESTATION AND CATTLE GO HAND IN HAND!

#### A.1 18 KILOS OF MEAT PER PERSON AND PER YEAR IN COLOMBIA

Cattle accounts to 21.8% of agricultural activities GDP (FEDEGAN, 2020) and 19% of rural jobs (Rincon, 2019). In 2018 according to Colombian Agricultural Institute (ICA) figures, cattle was split between 600`578 farms of 45 cows on average (ICA, 2020). 15% of national livestock is allocated to dairy production, 39.3% to dairy-meat farming and 45.7% is wholly dedicated to meat.

#### A.2. A CLEAR LINK BETWEEN DEFORESTATION AND CATTLE BREEDING

According to the IDEAM, 70% of deforestation in Colombia in 2016 and 2017 was related to transformation into farm lands and extensive cattle breeding, with an increase by 23% between 2016 and 2017 (Fundacion Natura Colombia and CDP, 2018). Studies car-

ried out by the IDEAM show that the share of cattle breeding, which is the main driver of deforestation, in agricultural activities are increasing.

In Colombia, 34.4 millions hectares are used for agricultural activities whereas only 15 millions hectares are deemed suitable for such activities. The major part of this land is dedicated to extensive cattle breeding with a very low cow headcount per hectare: only 0.6 heads of cattle/ha. The trend of transformation into farmlands and pushing back agricultural borders are closely related to cattle. Deforestation is usually brought about first by subsistence or small scale farming (legal or illegal cultivations). Gradually, these cultures are often replaced by grasslands that are stretched to bear other activities, such as livestock, to increase productivity or legitimate the land property (Etter et al., 2006, Nepstad et al., 2014).

The increase of livestock speeds up deforestation in Colombian Amazonia (Semana sostenible, 2020)<sup>1</sup>. During the last 4 years, livestock increased on average by 4% per year, with a growth peak of 11% between 2017 and 2018. This growth coincides with the signing and start of the peace process between the Colombian state and the Revolutionary Armed Forces of Colombia (FARC). Indeed, at the same time the deforestation increased in the country. Between 2014 and 2018, the average growth of livestock was 3.7% and the number of farms increased by 4.4% on average. On the other hand, during the same period deforestation increased by 29%.

Finally, the Ecosocial Foundation (Viancha et al, 2020) reports that the impact of the

agricultural sector would even be significantly higher if we were to take into account deforestation related to cattle farming in order to gain property of the used areas. Land-grabbing<sup>2</sup> was in fact the main reason for deforestation during the last 3 years. Indeed, while land-grabbing is related to money laundering, one of the most often used techniques to legitimate this monopolization is still to occupy these lands by livestock.

Moreover, when livestock is included and sold in the chain of value, market stakeholders can't identify if the cattle comes from deforested areas for land-grabbing or if it comes from a proper farm. Therefore, for a buyer committed to a supply devoid of products related to deforestation, it is impossible to distinguish based on this criteria (Viancha et al, 2020).

## B. UNE CHAÎNE D'ÉLEVAGE FRAGMENTÉE

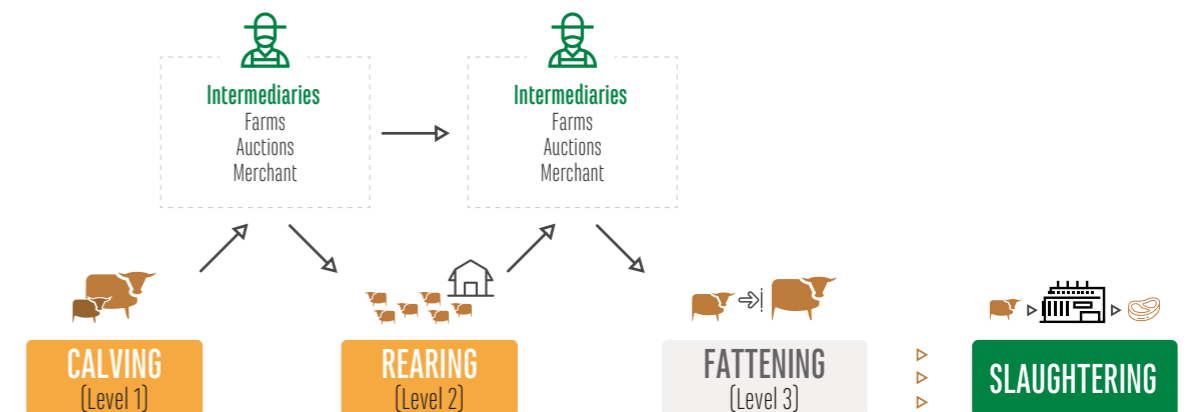
### B.1. NUMEROUS STAGES AND INTERMEDIARIES

As for Brazil, livestock go through several stages:

- Breeding stage:** pregnancy, calving and weaning until the animal reaches its 18 months
- Rearing stage:** between the start of weaning at 18 months and when the animal reaches its 24 months
- Fattening stage:** from 24 months until the animal slaughter

### END-TO-END PRODUCTION LINE (Calving - breeding - fattening)

Source : National Wildlife Federation



Infographics 3: Complete production cycle (breeding, farming, fattening)  
Source: National Wildlife Federation

<sup>1</sup> The former director of the local entity of the National Parks of Amazonia published figures regarding the bovin inventory from the ICA 2016-2017 showing the relationship between the increase of the bovin herd and the deforestation in the Colombian Amazon  
<sup>2</sup> See definition page 5

Cattle can be sold during whichever stage. The trend of transporting living livestock on long distances, the intervention of numerous intermediaries, as well as auctions make it harder to track the cattle. The Ecosocial Foundation reports that intermediaries' operations are weakly framed and only add to the inefficiency and lack of formalism of the supply chain. These components are challenges that must be overcome to improve the chain's traceability and level of control.

### B.2. THE MAIN STAKEHOLDERS FOR THE DISTRIBUTION

Several types of stakeholders can be found throughout the supply chain:

- **Middlemen** match offer with demand at the end of the fattening stage. They ensure negotiation between farmers and buyers.
- Meanwhile, **gatherers** are responsible for gathering batches of living cows because of the distance between farms, to then sell them

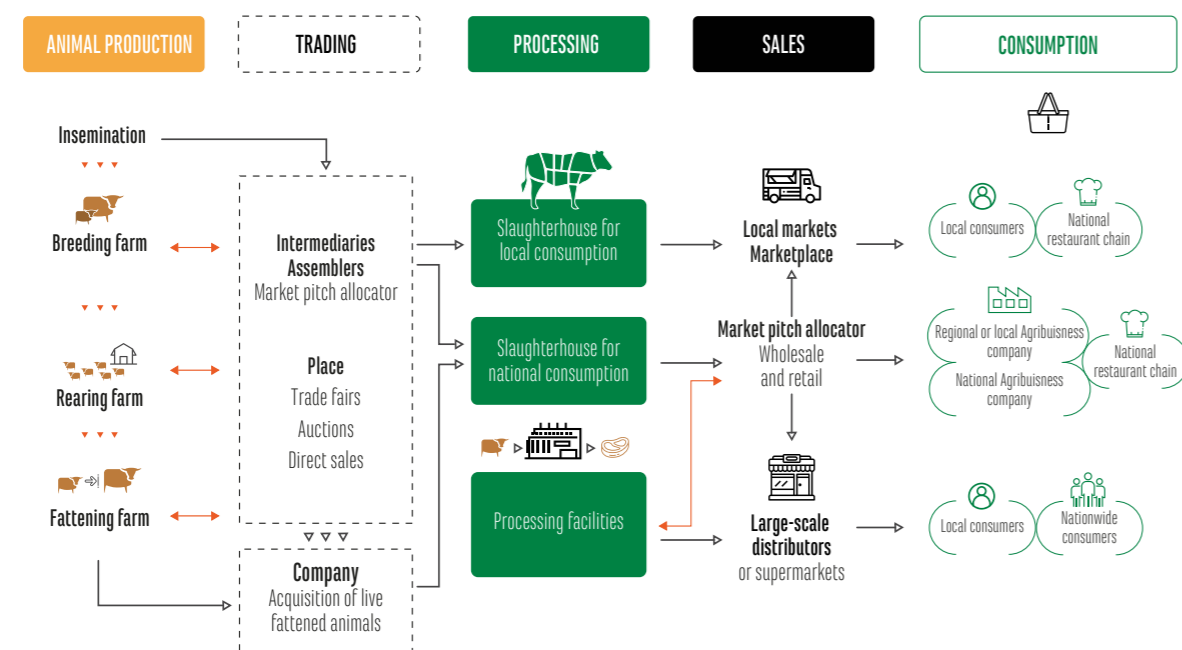
in several places such as breeding fairs.

- As for **brokers**, they have direct contact with department stores, restaurants, butcher shops, etc. They supply the logistics required to distribute carcasses or meat cut for final customers.
- There are of course also the **slaughterhouses** (or cold cellars) which slaughter and cut the cows. They must be homologated by Colombia's National Food and Drug Surveillance Institute (INVIMA).

According to the EcoSocial Foundation: "what usually happens, is that a broker buys the animals alive and signs a contract with a slaughterhouse for the slaughtering and deboning services. The broker receives the order with buyers' specific needs such as restaurants or supermarkets, and forwards it to the slaughterhouse. The latter has no direct link with the distribution of final products. However, some slaughterhouses in Colombia distribute cattle and sell the meat and final products to other buyers."

### THE MEAT SUPPLY CHAIN IN STEPS

Source : Université de Wisconsin



Infographics 4: Illustration of the meat supply chain  
Source: Wisconsin University

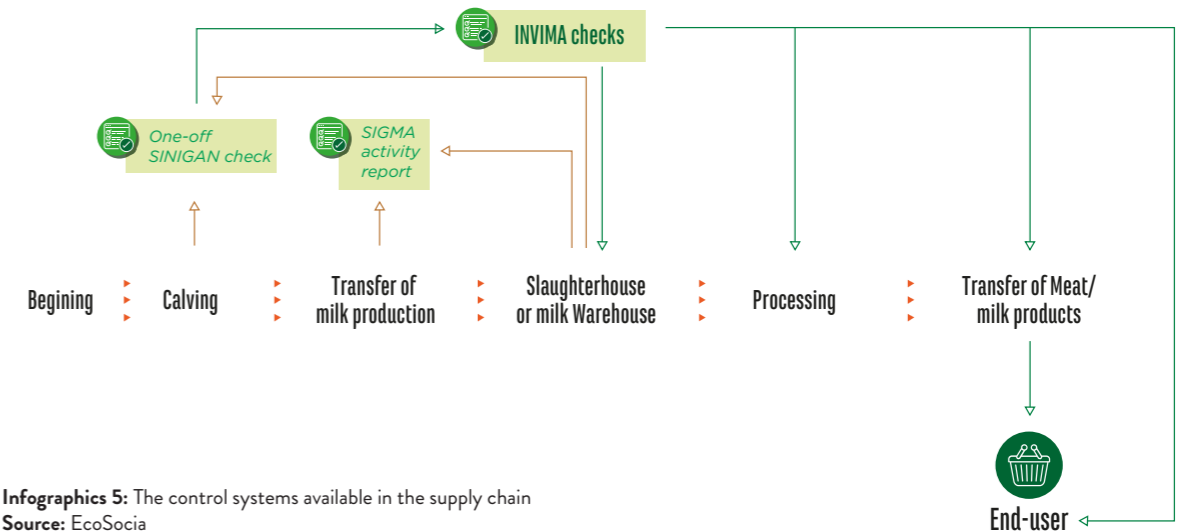
### C. FAILING CONTROL TOOLS THAT PREVENT TRACEABILITY

There are several systems (tools, registries, information systems) available in Colombia for sanitary control and tra-

ceability of the initial production and cattle distribution (cf. graphic 7). This process must be led by farmers.

#### TOOLS AVAILABLE TO MONITOR THE SUPPLY CHAIN

Source : Ecosocial



Infographics 5: The control systems available in the supply chain  
Source: EcoSocia

However, **these tools are insufficient to carry out an exhaustive follow-up of the animal and ensure its traceability** due to many components.

the INVIMA, this certification doesn't include their geographic position. It is therefore almost impossible to control deforestation in those lands.

There are several failures starting as soon as the calving period, there are several failures. Currently, the country only knows 17% of the livestock from birth (mainly in highly monitored territories such as border areas or territories with a health risk), meaning that **most animals have little to no traceability at birth**. Furthermore, even if grasslands where more than 5 cows are calving must be certified by

As for the SAGARI vaccine registry from the Farmers' Federation, it **includes** geographic data, but it is not linked to any other registry and access to this information is not granted to the other control entities. Based on review of these registries by approved organizations, it even appears that vaccine campaigns have been carried out in areas where cattle is prohibited such as natural parks or outside the

borders of agricultural territories (forest areas where there should not be any deforestation since 2010). If these practices ensure health control, it also legitimates cattle breeding in deforestation areas.

From then on and throughout the complete supply chain, animal batches are mixed. Moreover, cows are sometimes transported alive from one farm to the other on hundreds of kilometers, sometimes for 8 hours. The buyer for a batch can therefore not control that the farms where the cows are from have not caused any deforestation. It may be possible to track animals by batch, but once several batches are gathered (for instance during breeding fairs), the data regarding the origin of each cow is diluted. This also happens in slaughterhouses where batches may again be mixed. As slaughterhouses are not stakeholders in contact with either farmers or buyers, they control the existence of datasheets for the animals but don't check their truthfulness.

Finally, traceability is even more reduced than the Colombian Agricultural Institute (ICA) uses two softwares at the same time: on the one hand, a tool for the moving of cattle (SIGMA) and on the other a tool for individual identification (SINIGAN). These two information systems are not interoperable as they were not designed in a unified manner. Additionally we should take into consideration intermediaries' fraudulent practices, the alteration of moving datasheets to hide the true origin of animals or bribes to authorities during road controls to avoid seizure of cattle.

## D. THE RESPONSIBILITY OF GRUPO EXITO / CASINO

According to an investigation on cattle slaughter, department stores accounted for 23% of meat sales during the first quarter in 2019 (Viancha et al., 2020). Moreover, Grupo Exito / Casino holds 42% of market shares (Grupo Exito, 2019). Consequently, it can be estimated the group buys approximately 10% of meat produced in Colombia. However, it doesn't have any active policy regarding farming practices in this country. If you can more or less identify the first link in the chain and know which farm the cattle is from before entering the slaughterhouse, Grupo Exito / Casino can't currently guarantee it knows all the farms the cattle went through. As it doesn't have this information, it can't guarantee that no cow was born or reared in a farm that generates deforestation.

It is simply impossible for **Grupo Exito / Casino - leader for retail in Colombia who has not set up any additional traceability system - to ensure the meat sold in its shops did not cause deforestation.**

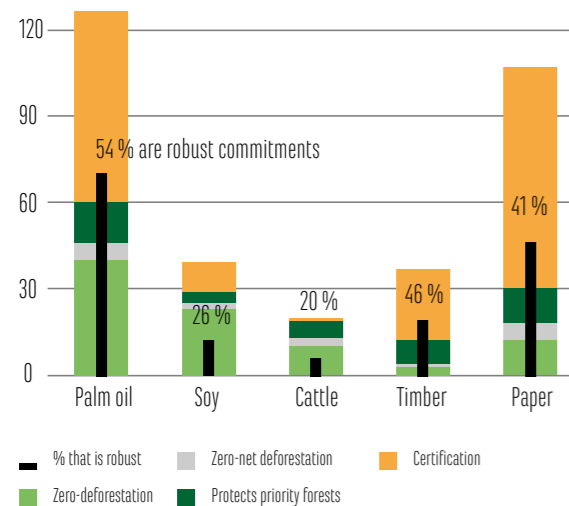




## V. CASINO, A FRENCH STAKEHOLDER LINKED TO DEFORESTATION IN THE MOST BIODIVERSE COUNTRIES ON EARTH

Currently there are 5 main commodities that pose a risk in terms of deforestation: palm oil, soy, timber, paper and in first and foremost in South America, cattle. However, only 20% of companies assessed by Climate focus are considered as robust for the beef sector (Forest 500, 2019a).

According to Forest 500 assessment, Group Casino only scores 31% (Forest 500, 2019b)



**Infographics 6:** Ratio of robust commitment by main commodity related to deforestation

**Source:** Climate focus 2019, provided by Forest 500

## A. CASINO'S DOUBLE FACE; FRANCE VS SOUTH AMERICA

The Group Casino Guichard-Perrachon is a French retail group created in 1898 near Saint-Etienne (France) by Geofroy GUICHARD. It is a well-known retailer in France, Europe and the rest of world thanks to its many subsidiaries and shop brands. It is owned by the French company Rallye managed by Jean-Charles NAOURI since 1997. The Group doesn't only use the name "Casino" for its shops but also owns several other brands: from the "Naturalia 100% organic and vegan" shops in Paris to the "Assai" stores in Brazil (Casino Group, 2020d).

### A.1 HIGH REVENUES FROM SOUTH AMERICA AND A "TRENDY" IMAGE IN FRANCE

Casino Guichard-Perrachon is a French retailer that owns over 12`000 shops of different sizes and shapes, including convenience stores, supermarkets and hypermarkets, mainly in France and South America. According to Forest 500, the size of its distribution market exposes the group to several commodities that pose a risk to forests (Forest 500, 2019b). At global level, the group is among the 20 biggest retailers for food market.

Group Casino's globalization sped up at the end of the 1990s with its expansion in South America based on the acquisition of the GPA Group in Brazil (Groupe Casino, 2020c) and Grupo Exito in Colombia (Parigi, 2011) in 1999. Nowadays, it is in South America that the group knows its strongest market domination.

In France, with the stunted growth of hypermarkets on the outskirts since the last ten years, Group Casino is developing stores in city centers. Smaller and closer to customers, store brands such as Monoprix, Franprix and Naturalia as well as e-commerce are developing quickly (Bader, 2010). Between 2008 and 2010, Group Casino opened over 100 stores "Le Petit Casino" a year, as many Franprix and around twenty Monoprix or Monop', the proximity brand (smaller stores than Monoprix). These stores are aimed at an urban population regarding towards its groceries.

Since 2005, French brands are undergoing a reshape of their activities in city centers where Casino and Carrefour groups dominate 70% of an overloaded market (Alesky, 2018). The augmentation of proximity and specialized stores such as Monop' illustrates this approach. Group Casino announced in 2018 it planned "hundreds of franchise projects adapted to each format, both in city centers and rural areas" (Pompougnac, 2018). In 2020, Monoprix/Casino announced it would deliver its products in Paris and its suburbs to customers who subscribed to Amazon Prime, the express delivery service from Amazon.

These last years, to answer the vegan trend, 4 stores Naturalia 100% organic and vegan were also opened in Paris. In these shops Group Casino sells organic and vegan products from its own brand or from national brands (Naturalia, 2018).

Group Casino's results can be split in 3 main categories: retail business in France, e-commerce and retail business in South America (LatAm). In 2019, the groups' results showed an upward trend (Casino Group, 2019b). With

a turnover of 34.6 billion euros, the group recorded an organic growth of 4.2%. However, at a closer look, the French activities are stable whereas in **South America they grew by 9.2%** (Casino Group, 2019b). While the South American (LatAm) activities represented 43% of the group's turnover in 2018, they were higher than the retail activities in France in 2019 (Casino Group, 2019b). The organic and food sectors are also doing well with a growth of 5.9% in France. **With these results** and the motto "Nourishing a world of diversity", **major investments for sustainability are expected in South America.**

## A.2. CASINO'S OWN TRADEMARK, A STRATEGY FOR FRESH AND BUTCHER PRODUCTS

Group Casino launched several innovations such as the first self-owned trademark in the retail industry in 1901 (Group Casino, 2020c). Retailers, as their name suggests, are neither producers nor processors, and therefore don't own any plants to develop their own products. Consequently, to set their own trademark, they must usually work with third parties producers. Likewise, for the butcher department some providers supply supermarkets with both products sold under their own brand and products sold at the meat counter of the supermarket.

For instance, the Bigard company sells its products under its own brand "Charal" while Bigard slaughterhouses are one of the main meat providers to retailers in France. In Brazil, the JBS company, biggest society for beef meat, is both a producer with its brand "Friboi" sold in GPA stores, as well as the main supplier for GPA/Casino's butcher department.



## B. UNEVEN COMMITMENTS THAT ARE IRRELEVANT TO GROUP CASINO'S SUPPLY CHAIN CHALLENGES

Naturalia is a French retailer specialized in products from organic and biodynamic farming, fair-trade as well as organic beauty products and eco-products. According to the "Baromètre de l'économie positive et durable" (Poll regarding positive and sustainable economy) set up by YouGov for Business Insider France (Sicard, 2019), Naturalia is ranked fourth among the most eco-responsible brands for French people.

Thanks to this brand and to the growth of organic sales, Group Casino became in 2018 the second retailer of organic food products in France with 11% of organic sales recorded in Group Casino's stores (Group Casino, 2018). It also received 5 awards (Group Casino, 2020b) from the Grands Prix ESSEC for sustainable retailing.

Even though this is a strong signal for the French market, this approach is not consistently implemented in France and even less so throughout its global activities.

Group Casino's policy and action plan for the beef sector were assessed by Forest500 as other companies and financial organizations with risky activities in terms of deforestation. The group's beef policy and related actions were rated "weak" with a score of 31% (Forest 500, 2019b, p.500).

Their overall approach, which includes the commitment to protect forests, only obtained 2 points out of 14!

Indeed, at Group level, no commitment is taken to exclude the production or sourcing of products from natural ecosystems. For a company that claims to be "committed" and acts as a leader in the first and second most biodiverse countries on earth, this is a major failure.

The action plans implemented by Group Casino to protect the environment are severely lacking. In Brazil, GPA's beef purchasing policy does not include a detailed implementation planning and hasn't been updated since March 2016 (as of May 2020), despite the company's announcement that it would be reviewed before January 2018. The most recent progress report dates back July 2017. Since then, deforestation hasn't stopped. Quite the contrary actually.

The commitments taken in Brazil do not apply to all direct suppliers according to Global Canopy. Furthermore, no control action has been implemented for indirect beef suppliers (GPA, 2016). The policy (GPA, 2016) mostly mentions direct suppliers and only suggests that Group Casino relies on its suppliers' actions to identify and monitor indirect farms.

Group Casino hasn't set any starting date regarding deforestation in all ecosystems in its policy. Consequently, **it can't define what type of deforestation is unacceptable.**

A geolocation monitoring is implemented for some suppliers, but **there is no public list of the suppliers** or any public exclusion process for non-compliant suppliers including national brands sold in stores.

Furthermore, GPA/Casino signed the Statement of Support for the Cerrado Manifesto (GPA, 2017). This manifesto, launched in 2017 by civil society organizations, beckons companies to commit to zero deforestation in the Cerrado biome (Manifesto do Cerrado, 2017). Still, there is no action to end deforestation in the Cerrado biome.

As for beef products sold by Group Casino, the policy only mentions fresh and packaged meat. There is no sign yet that the company has defined a no-deforestation policy for processed products that contain beef like lasagna or sauce. Finally, leather from Brazilian cattle isn't covered by environmental measures, not even in France (Luche et al, 2013).

In 2019, Chain Reaction Research (CRR) noted that **Group Casino was already exposed to reputational risks**. Thirty beef products tested in Brazil were related to high and very high risk JBS plants (Faggin et al, 2019). Despite this detailed report, Group Casino didn't issue any update regarding its supplies or share

any update with CRR. GPA/Casino beef policy for Brazil still ends (as of May 2020) with the following sentence: "This policy is part of an ongoing improvement process and will be reviewed in January 2018" (GPA, 2018). Civil society still waits for this update. And so does the forest.

## CASINO GROUP : SOUTH AMERICAN REALITY VERSUS FRENCH MARKETING

CASINO GROUP IN FRANCE (Casino, Naturalia, Franprix, Monoprix)	CASINO GROUP IN SOUTH AMERICA (GPA, Exito, Assaï, Extra)
of Casino's Turnover in 2019 (Sales increase of <b>+0,3%</b> )	47% of Casino's Turnover in 2019 (Increase of <b>+9,2%</b> in sales )
<ul style="list-style-type: none"> <li>• <b>N°2 in Organic sales</b> in France 2018</li> <li>• Opens the first <b>100% Vegan and Organic stores in Paris</b></li> <li>• <b>Numerous prizes for environmental policies and commitments</b> (ESSEC, N°1 retailer in Europe for commitments to environmental protection)</li> </ul>	<ul style="list-style-type: none"> <li>• N°1 retailer in Brazil and Colombia</li> <li>• <b>Potential deforestation of 56 000 Ha</b> 56 000 Ha of Amazonian forest in 2019</li> <li>• Several verified cases of direct and indirect suppliers responsible for deforestation and invading Indigenous land in Brazil</li> <li>• N°1 retailer in Colombia with <b>43% marketshare</b></li> <li>• <b>No responsible beef sourcing policy</b> in Colombia</li> <li>• <b>No NDPE policy</b> (No deforestation, No Peat, No exploitation)</li> </ul>

Infographics 7 : Group Casino's double face between France and South America  
Source : Envol Vert

Group Casino's purchasing policy in South America does not apply to all its activity, and in particular the **"Universal Registration Document" (DEU) issued in 2019 doesn't mention actions implemented to secure beef meat in Colombia (Group Casino, 2019a)**. The application scope for Group Casino's policy suggests there is no deforestation in the Colombian beef supply chain. Yet, we know it offers even less traceability than in Brazil and therefore even less guarantees. Vague sentences on traceability are publi-

shed on Exito/Casino's website (Grupo Exito, 2018). However, through its Exito subsidiary,

Group Casino communicates strongly on the first products with Rainsforest Alliance beef sold in Colombia. This is by no means an improvement for the beef sector as actually only two shops in Bogota sell products from this brand (Grupo Exito, 2017).

The rest of this report presents the main results for the investigation carried out in Brazil.



## VI. MANY PRODUCTS RELATED TO DEFORESTATION IN GROUP CASINO'S STORES IN BRAZIL

In October 2019, Envol Vert launched an investigation on Group Casino's beef supply chain in Brazil. The association collaborated with several partners, in particular:

- Reporter Brasil, a team of investigative reporters specializing in environmental and human rights violation issues, and especially in the analysis of the supply chain for the main economic sectors;
- Chain Reaction Research, a researchers and scientists consortium that carry out risk analyses on supply chains to prove deforestation is also a financial risk.

### A. A SAMPLING METHODOLOGY FOR GROUP CASINO'S SALES

#### A.1 IN BRAZIL, VARIOUS PARTNERS AND DATA SOURCES CONFIRM THE LINK BETWEEN GROUP CASINO, THE BEEF SECTOR AND DEFORESTATION

Several recent studies demonstrate an actual link between deforestation and Group Casino's supply chain. Here is a summary of these reports:

**Table 4:** Existing tools and previous investigations linking GPA/Casino to deforestation  
**Source:** Reporter Brasil, Chain Reaction Research, Mighty Earth, Mediapart

ACTORS / TOOLS	METHODOLOGY	SUMMARY OF THE RESULTS
CHAIN REACTION RESEARCH – CATTLE DRIVEN DEFORESTATION – 2018 (KUEPPER ET AL., 2018)	Similar methodology to the one used by Envol Vert with Reporter Brasil (see below)	2018 results show that: <ul style="list-style-type: none"> <li>• 30% of slaughter capacity in legal Amazonia is owned by slaughterhouses that haven't signed the TAC agreement</li> <li>• Buying from slaughterhouses that signed the TAC doesn't guarantee zero-deforestation. Chain Reaction Research considers that at least 8.3 millions hectares of deforestation were caused by products sold by entities that signed the TAC between 2010 and 2015.</li> <li>• Beef slaughterhouses lack efficiency to track and control indirect suppliers. The animals can be bred on recently deforested grasslands before they are moved to direct suppliers' farms that comply with the various environmental regulation.</li> </ul>
CHAIN REACTION RESEARCH – GPA'S BEEF SUPPLY CHAIN -2019 (FAGGIN ET AL., 2019)	Similar methodology to the one used by Envol Vert with Reporter Brasil (see below)	In 2019, the beef supply chain of "Grupo Pão de Açúcar" was assessed with regard to deforestation risk: <ul style="list-style-type: none"> <li>• GPA can be exposed to a deforestation risk in its supply chain.</li> <li>• There is no deadline for the deforestation on all ecosystems within Group GPA's responsible purchasing policy and its last update dates back from July 2017.</li> <li>• 30 products were identified as coming from high risk slaughterhouses located in legal Amazonia.</li> </ul>
MIGHTY EARTH (RAPID RESPONSE) (MIGHTY EARTH, 2020)	Methodology relying on a mix of: <ul style="list-style-type: none"> <li>• GLAD data (Global Land Analysis &amp; Discovery)</li> <li>• Confirmation by the review of nano-satellites images from the company Planet, specializing in the supervision of agricultural and forest lands</li> <li>• Control of the financial links between identified farms and suppliers</li> </ul>	Many deforestation cases were linked to various suppliers such as JBS or Marfrig thanks to the Rapid Response system.  The identification of 5 indirect suppliers causing deforestation related to JBS slaughterhouse in Diamantino in the Mato Grosso is a typical example of the Mighty Earth tool results. Through the investigations carried out by Envol Vert it is possible to link this slaughterhouse to many products sold by Group Casino.
MEDIAPART (NEVES, NO DATE)	<ul style="list-style-type: none"> <li>• Investigation and interviews in the Rondonia region</li> <li>• Partnership with local NGOs (Natural Wildlife Federation, Greenpeace, Amis de la Terre Brésil)</li> </ul>	Mediapart proved the link between a JBS slaughterhouse in Rondonia region and various state farmers under embargo by Ibama.
REPORTER BRASIL – ARTICLES 2020 – (CAMPOS AND BARROS, 2020A, 2020B, 2020C)	<ul style="list-style-type: none"> <li>• Investigation, interviews</li> <li>• Use of official and publicly available data</li> <li>• Cross-referencing of data with deforestation satellite images and government blacklists</li> <li>• Data validation process with the various incriminated actors</li> </ul>	Some cases resulting from Reporter Brasil's investigation will be detailed in the Part B of this section. Here are all the identified cases: <ul style="list-style-type: none"> <li>• 3 cases in the São Félix do Xingu province that involve the intrusion on indigenous lands linked to Marfrig and Mercurio Alimentos slaughterhouses.</li> <li>• 3 cases in the Mato Grosso related to JBS slaughterhouses in Diamantino and Araputanga.</li> </ul>

## A.2. THE INVESTIGATION METHODOLOGY SET UP WITH OUR BRAZILIAN PARTNERS

Between October 2019 and May 2020, the objective was to identify possible deforestation cases by direct and indirect farms supplying Group Casino in Brazil with products under their own brand and national brands or fresh meat.

The methodology deployed can be broken down in several steps.

### Step 1: Defining a panel of products from a sample of stores

In a supermarket belonging to Group Casino in Brazil, there are two types of products up for sale:

- **National brands** belong to processing companies (for instance, Maturatta Friboi is owned by JBS).
- **Self-owned brands** are directly produced by the retailer. For instance, the brands Rubia Gallega and Qualita belong to GPA/Casino (GPA, 2020). Fresh meat sold by GPA/Casino butcher departments are also considered as a self-owned brand as it is first bought and then processed (cut) by GPA/Casino. It is therefore also under the full responsibility of Group Casino.

Two beef products were not covered by our investigation: leather and processed meat (i.e: frozen lasagna, cooked meatballs, etc.). According to sector stakeholders, the exact origin of these products is even harder to track back than the one of beef itself.

Since 1999, Group Casino is the owner of various stores in Brazil through its subsidiary GPA, Grupo Pão de Açúcar (Group Casino, 2020a):

- “Pão de Açúcar” stores which represent Group Casino’s luxury brand,
- Extra supermarkets and supermarkets,
- Assaí Cash-and-Carry shops.

Our attention was focused on a sample of 10 Assai and Extra stores from GPA/Casino located in the Northern and North-Western parts of the country, which represent approximately 1% of GPA/Casino stores in Brazil (USDA Foreign Agricultural Service, 2019).

### Step 2: Tracing back the sold product to the slaughterhouse

#### For packaged products:

Investigators collected a total of 131 products (frozen or not) in the 10 stores (Assaí and Extra) located in 7 cities in Brazil (Table 5). Hereafter, an example of pictures of products sold in the shops; these pictures show the different information available on the label and used during the investigation.



Picture 1 : Label present on a beef product sold by GPA  
Source : Reporter Brasil and Envol Vert

State	Municipality	Type of store
Pará	Belém	Assaí Atacadista
Pará	Ananindeua	Assaí Atacadista
Mato Grosso	Várzea Grande	Assaí
Mato Grosso	Cuiabá	Extra
Mato Grosso	Cuiabá	Assaí
Mato Grosso	Cuiabá	Extra
Mato Grosso	Rondonópolis	Assaí
Tocantins	Palmas	Extra
Amazonas	Manaus	Extra
Amazonas	Manaus	Extra

Tableau 5: State, municipality and type of GPA store visited during the investigation.  
Source: Reporter Brasil and Envol Vert

Thanks to the information available on the label it is possible to identify the processing plants or slaughterhouses where the product comes from. Indeed the CNPJ number of SIF reference (Serviço Federal de Inspeção) is a precise registration number which stands for a production plant. This method is used for the two types of brands, but especially for **national brands**.

#### For fresh meat

The second approach was used more specifically to link back **fresh meat products under Group Casino responsibility** to slaughterhouses. The main product sold by GPA/Ca-

sino under its own brand in Brazil is fresh meat directly sold at the butcher display. **To find** the link between this meat and slaughterhouses, investigators interviewed GPA employees working in the sale and transport of carcasses to know the origin of the meat under their responsibility. The interviews were carried out in two Extra stores in the city of Cuiabá in Mato Grosso.



Picture 2: Butcher display in an Extra store in Cuiabá  
Source: Envol Vert investigation 2020

### Step 3: From the slaughterhouse to the farm (direct or indirect)

This link was evidenced by official documents collected by the investigators. The relation can thus be traced between indirect and direct farms, slaughterhouses and also GPA/Casino stores. To protect both sources and investigators, the exact nature of some documents can't be revealed (Campos and Barros, 2020a, 2020b, 2020c).

Data collected by our investigators was shared with the Chain Reaction Research team so they could study in detail the link between the two JBS slaughterhouses in Diamantino and Araputanga in Mato Grosso. They were able to provide the complete list of direct suppliers for the slaughterhouses between January 2018 and May 2019.

### Step 4: From the farm to deforestation

To prove deforestation (and other violations) is taking place on a farm, the technique used relies on cross-referencing land-register data (CAR) from the various suppliers identified with the Brazilian government blacklist (slave labour, environmental fines and areas under embargo) with deforestation alerts from different surveillance systems (PRODES, Global Forest Watch).

The lawfulness or unlawfulness of a deforestation in Brazil can be assessed through different means, but here are the two main ways:

- The Brazilian Forest Code, updated in 2012 (Governo brasileiro, 2012). It includes in particular:

- The legal reserve: area percentage of a rural land on which it is mandatory to maintain and protect natural flora. In legal Amazonia, this percentage is 80% (cv. art.12.I.a).

- The deforestation deadline, i.e. the date since when the government considers all deforestation in a legal reserve as unlawful (which must lead to an immediate shut-down of operations). This date is currently set to July 22nd, 2008 (Section II, art.17, paragraph 3).

- Additional regulations or definitions. For instance, regarding APP (Permanent preservation areas) which must be maintained and cared for by their owners. These areas can be added to the legal reserve.

- Brazilian states regulation also covers the identification of unlawful deforestation. For instance, in Mato Grosso, any switch or destruction of a forest must be approved by State environment agencies (Art.22 Law n°233 dated 21/12/2005) (Estado de Mato Grosso, 2005). It is possible to view the authorizations granted on SEMA's official website (Secretaria de Estado do Meio Ambiente, 2020).

## B. HOW PRODUCTS FROM DEFORESTATION ARE SOLD BY GROUP CASINO

### Note of caution:

Some confidential information obtained by our investigators onsite can't be published in this report. As we don't want to put anyone at risk, Envol Vert favors the protection of its sources.

### B.1. DIVERSITY OF DEFORESTATION CASES RELATED TO GROUP CASINO

The map below shows an overview of the various deforestation cases identified as related to Group Casino's supply chain. These cases come from different sources: Fundacion Ecosocial, Mediapart, Mighty Earth, Chain Reaction Research, Reporter Brasil. The link was found through Envol Vert's investigation.



# DIFFERENT CASES OF DEFORESTATION CAUSED BY THE CASINO GROUP

- GPA (Subsidiary of Casino group) stores investigated
- Farm
- Deforestation

## COLOMBIA

- Meat products sold at Exito (Casino)
- No traceability system implemented by Casino Group and no means to ensure meat is not the product of deforestation
- Cattle sector is an important driver of deforestation
- Exito (Casino) is the N°1 retailer in Colombia with **43% marketshare**

## LEMES - AMAZONIE FRESH OR FROZEN MEAT, GPA(CASINO) SÃO PAULO AND RIO DE JANEIRO

- Undeclared plots indirectly supplying the slaughterhouse
- Areas under embargo
- Environmental fines issued by IBAMA

### GPA(Casino) Supply chain



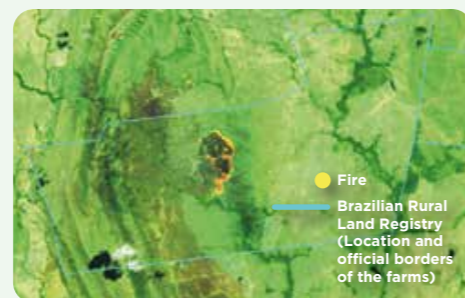
## FAZENDA ELLUS AMAZON FRESH MEAT, EXTRA (CASINO), CUIABA

- **6120 acres deforested since 2019** of which **4848 are** within the Permanent Protection Area (protected)
- **50 fire alerts** in 2019

### Animal transfer between January 2018 and May 2019



Envol Vert identified JBS(Araputanga) as a slaughterhouse supplying the butcher section of 2 Extra stores in Cuiaba



Visual confirmation of the fires  
Source : NASA 2020, Chain Reaction Research

## FAZENDA SANTO ANTONIO- AMAZON - FRESH AND FROZEN MEAT - EXTRA(CASINO) CUIABA

- **4075 acres illegally deforested (10% of total area** of which 273 acres within a Permanent Protection Area (protected)
- **R\$1,3 million of environmental fines in 2012** (around 239 000€)
- **662 acres under embargo** since 2016

### ANIMAL TRANSFER IN MARCH 2019



Envol Vert identified JBS (Diamantino) as a slaughterhouse supplying butcher sections of 2 Extra stores in Cuiaba



Deforestation traces within the Santo Antonio farm  
Source : Mighty Earth - Rapid Response-Soy and cattle alert n°1

## FAZENDA JR- AMAZONIE - FROZEN PRODUCTS, ASSAÏ (CASINO) RECIFE

- **8,3% of the farm** is located on the **Apyterewa Indigenous territory**
- **34 acres deforested** within the Indigenous territory
- Considered as occupying the land illegally and in bad faith by the MPF (Federal Proecution Service)

### Transfert d'animaux entre Mai 2018 et Décembre 2019



Reporter Brasil a identifié Marfrig (Tucuma) comme un abattoir fournissant des produits à Assaï (Casino) à Recife



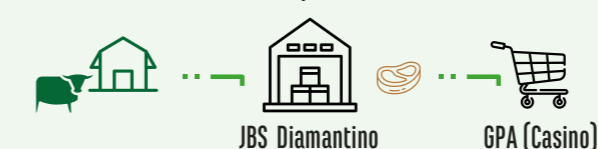
IJR Farm intrusion on the Apyterewa indigenous territory  
Source : Reporter Brasil (données SICAR)

## FAZENDA BIANCHINI - AMAZONIA

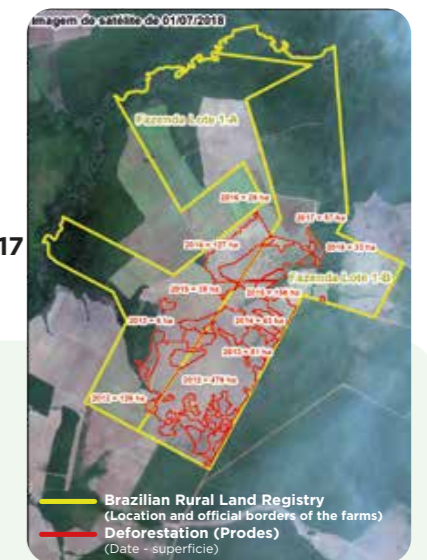
FRESH OR FROZEN MEAT, EXTRA(CASINO) CUIABA

- **2893 acres illegally deforested between 2012 and 2017**
- **R\$ 29 million in fines** (approx: €5.3 million)
- Areas under embargo

### Animal Transfer between April 2018 and June 2019



Envol Vert identified JBS(Diamantino) as a slaughterhouse supplying the butcher section of 2 Extra stores in Cuiaba



Deforestation within the Bianchini farm  
Source : Chain Reaction Research Données SICAR et PRODES

### B.1.1 FROM THE DISTRIBUTORS TO THE ABATTOIRS

#### Fresh meat from the butcher to the abattoir.

Our investigation enabled us to highlight the links between the fresh meat sold by GPA/Casino under its own label in the Extra stores in Cuiaba (Mato Grosso) and the **2 JBS abattoirs in Diamantino and Araputanga (Mato Grosso).**

Our investigators conducted several interviews with employees of the two Extra stores in Cuiaba, all of whom confirmed that the fresh meat came from the JBS abattoirs in Diamantino and Araputanga. Meat is delivered every Wednesday. Trucks from JBS abattoirs deliver the carcasses directly to the supermarkets which are part of Casino Group where they are cut and then displayed in the butcher's section.

Hence, the meat which is prepared on site and sold in these two Extra stores comes from the JBS abattoirs in Diamantino and Araputanga.

#### From frozen products to the slaughterhouses

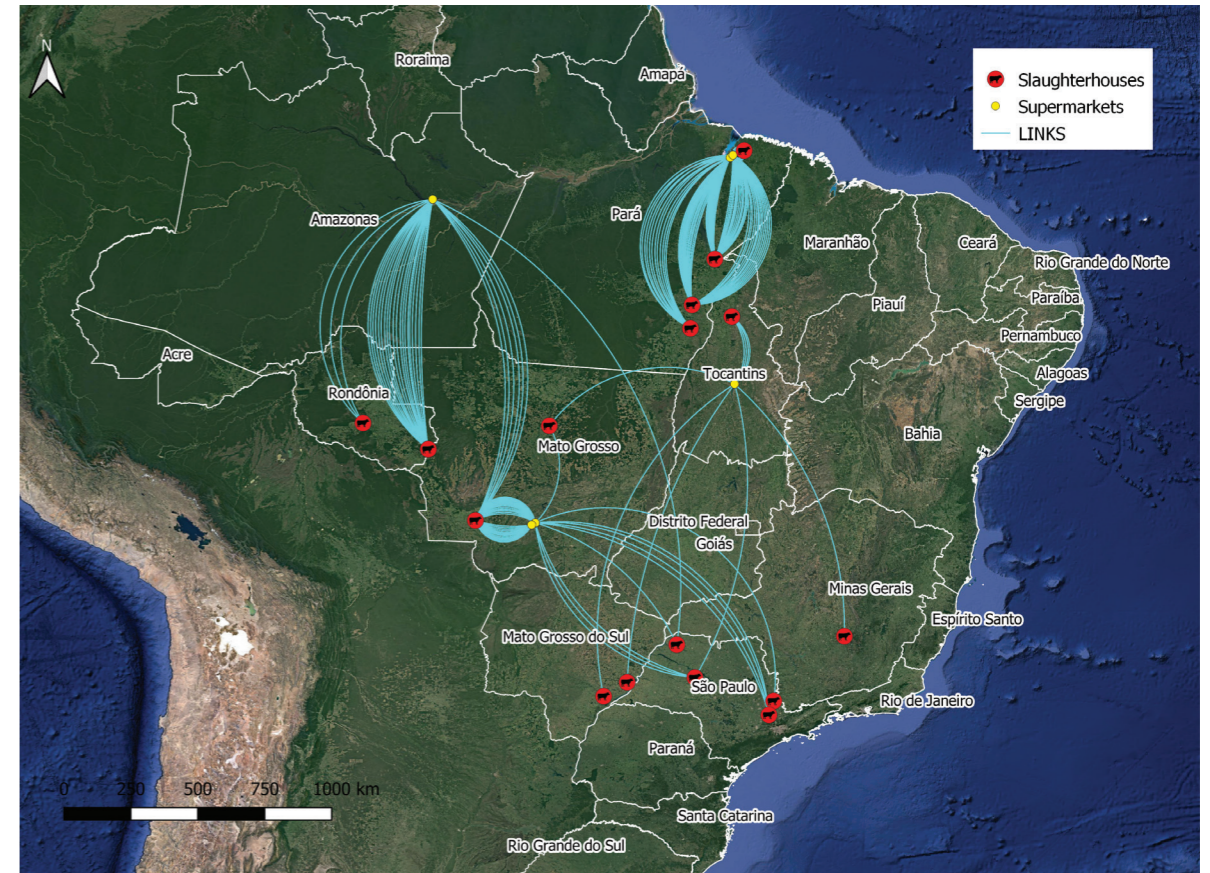
For those products sold under national brands the investigators adopted the same approach as that used by Reporter Brasil and Chain Reaction Research for their previous investigation over the period 2018-2019 (Faggin et

al., 2019). Photographs from 7 different towns of 131 products and the information on the product labels enabled us to map out product origins (Map 5).

These 131 products come from 21 different abattoirs across Brazil, of which 13 are in the Legal Amazon and 1 of which is considered high risk according to the Imazon report (Barreto and Pereira, 2017).



**Picture 3 :** Trucks in front of Extra stores in Cuiaba (Mato Grosso)  
**Source :** Reporter Brasil investigation 2020



**Map 3 :** Links established between abattoirs et GPA/Casino stores using label information from 131 products.  
**Source :** Aidenvironment et Reporter Brasil

### B.1.2 FROM THE ABATTOIRS TO LAWBREAKING FARMERS

Specific examples of illegal deforestation in the Amazon and other areas are listed below. We have selected 4 cases which are representative of the most typical scenarios according to our partners in Brazil. These farms, whose practices result in ecosystem conversion and deterioration of social conditions, are linked with the abattoirs identified as part of GPA/Casino's supply chain.

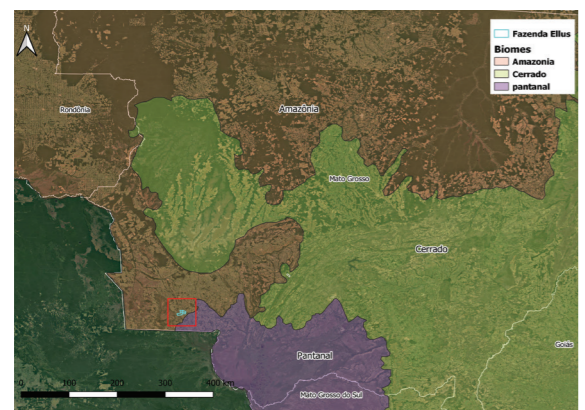


**“Fazenda Ellus” linked to the fresh meat sold in Extra stores and 36 products sold under national brands in Cuiabá, Rondonópolis and Varzea Grande (Mato Grosso).**

**FAZENDA ELLUS (MATO GROSSO), AMAZON**

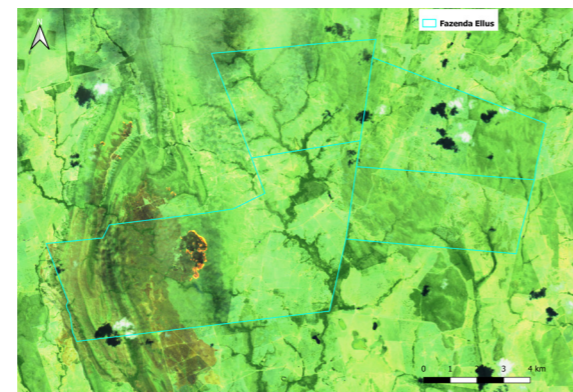
- 6,120 acres of forest burned in 2019.
- Direct supplier of JBS in Araputanga 2018-2019.
- Fresh meat sold by JBS in Araputanga to GPA/Casino's Extra stores in Cuiabá.

Chain Reaction Research detailed the links between JBS in Araputanga and a deforested plot of land on the “Fazenda Ellus” farm in the Amazon. Many animals were delivered from this farm to JBS’ abattoir. According to CRR, this farm saw 6,120 acres of deforestation by fire in 2019 of which 4,848 were located within the Permanent Preservation Area (PPA). These PPAs are supposed to be protected and managed by their owners (Sect II; art.7;part.1) (Governo brasileiro, 2012).

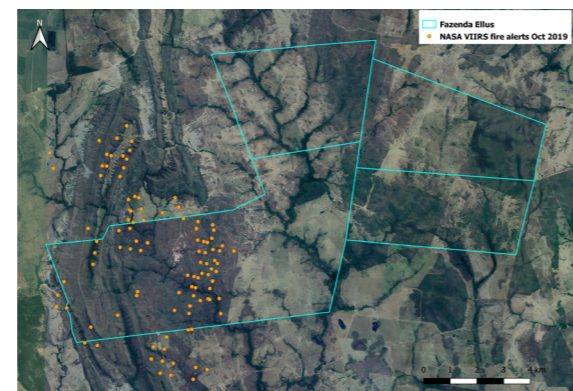


**Map 4 :** Geolocation (in blue) of the “Fazenda Ellus” farm in the Amazon region (in brown)  
**Source :** Chain Reaction Research

The NASA Satellite images shown below date from October 2019 and represent a visual confirmation (Map 5), of the forest fires within the farm’s borders. The MODIS system provides a visual representation (Map 6), of the individual fire alerts.



**Map 5 :** Visual confirmation of fires within the borders of Fazenda Ellus farm  
**Source :** Chain Reaction Research (images from NASA 2019)

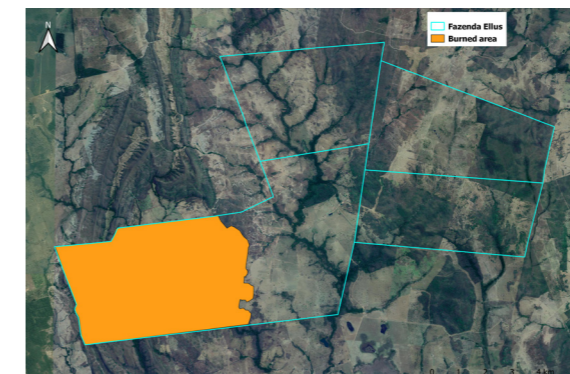


**Map 6 :** Fire alerts (orange dots) within the official borders (CAR) of the farm  
**Source :** Chain Reaction Research (MODIS alerts, October 2019)

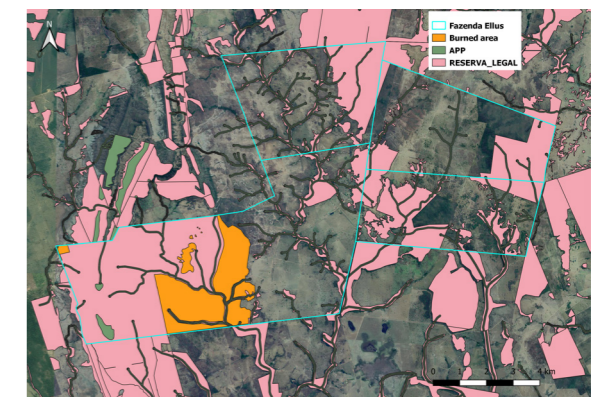
Illustrated below are :

- Total area destroyed by the fires (Map 7)
- The different areas officially recognised by the Brazilian government as protected zones (Map 8) and located within the property limits of the farm.

It can quite clearly be noted that the deforested areas overlap with protected areas. The meat originating from this farm and distributed by Casino Group is therefore directly linked to deforestation in these protected areas.



**Map 7 :** Total area destroyed by fires within the boundaries of the Fazenda Ellus farm  
**Source :** Chain Reaction Research based on NASA images



**Map 8 :** Official protected zones and area destroyed by fire  
**Source :** Chain Reaction Research

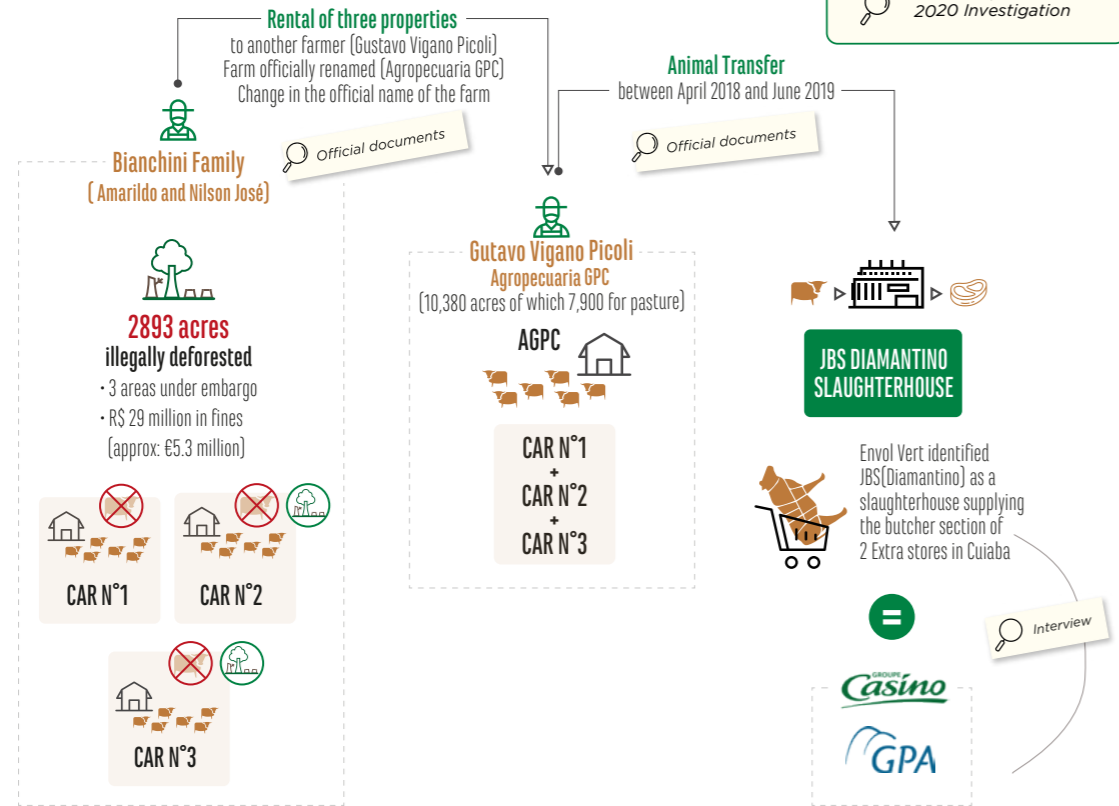
In short, this case demonstrates certain abattoirs are not capable of controlling their direct suppliers even when the latter are deforesting the epicentre of areas protected by Brazilian law.

“Fazenda Bianchini” directly linked to fresh meat sold in Cuiabá and also 13 products sold under national brands.

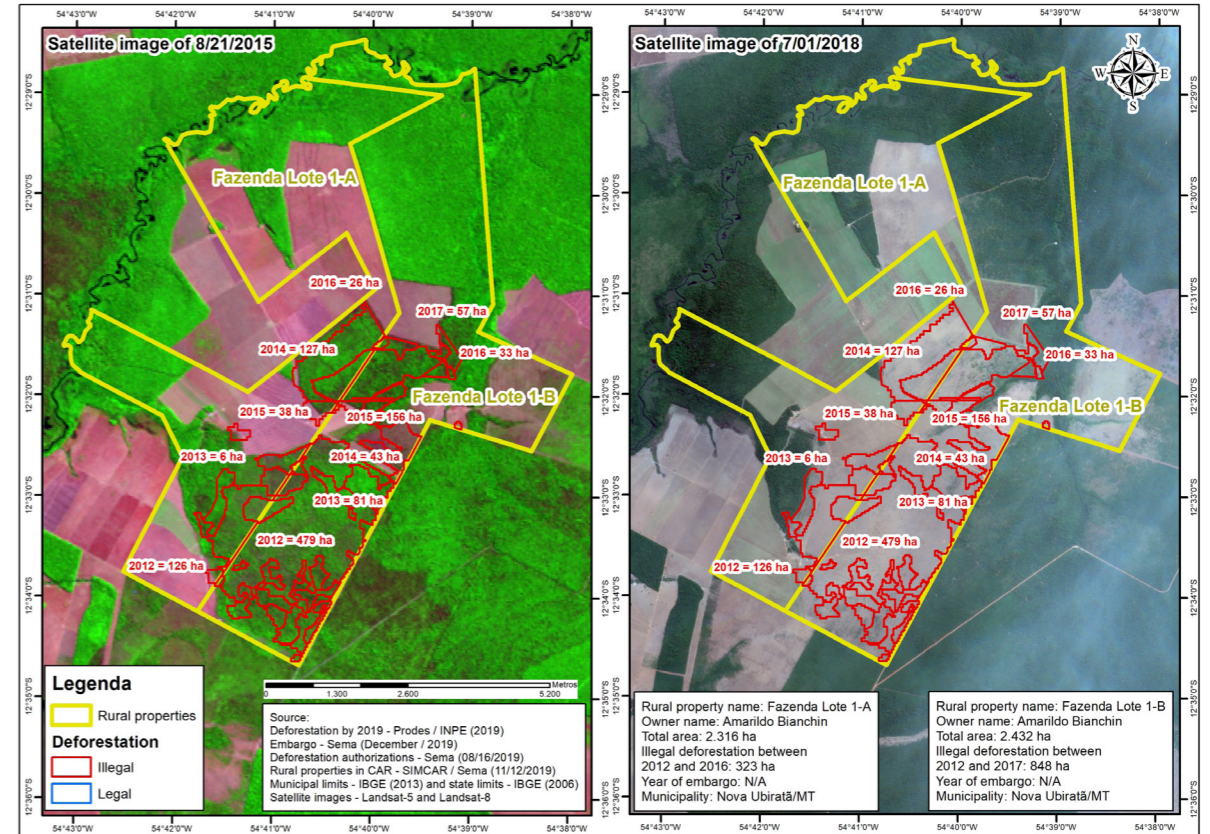
**FAZENDA BIANCHINI (MATO GROSSO), AMAZON.**

- 2,893 acres deforested between 2012 and 2017.
- R\$ 29 million in IBAMA fines in the last 7 years.
- From 2018 to 2020, many animals were transported to the JBS abattoir in Diamantino.
- JBS Diamantino sells fresh meat to GPA/Casino's Extra stores in Cuiabá.

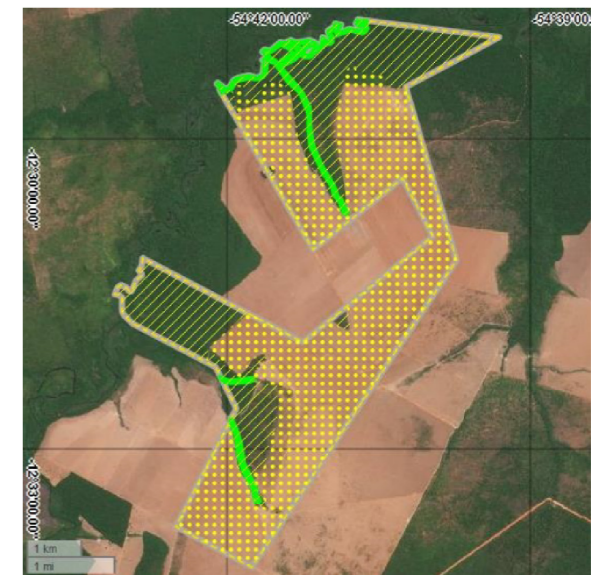
### FIRST CASE OF CATTLE LAUNDERING, THE BIANCHINI FAMILY



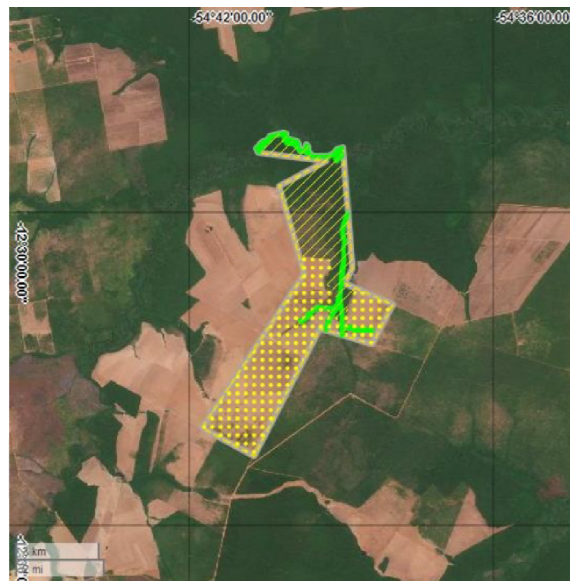
**Infographic 9 :** First case of pirated beef, the Bianchini Family  
**Source :** Envol Vert



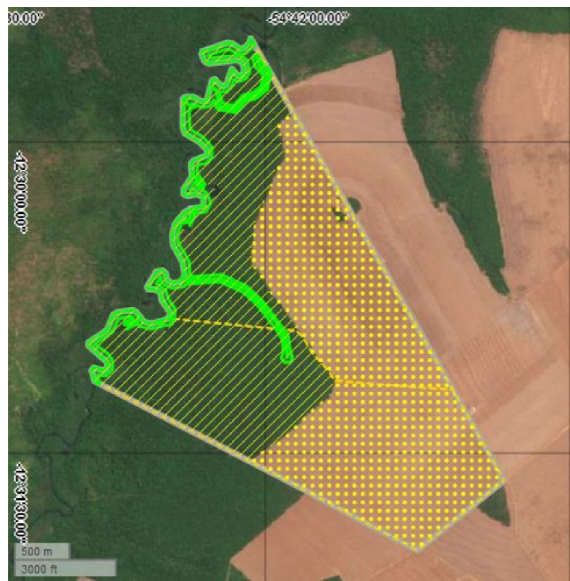
During this investigation, Reporter Brasil established a link between the JBS abattoir in Diamantino and the Bianchini farm (Campos and Barros, 2020a). Located in the Nova Ubirata municipality in Mato Grosso, the farm belongs to the Bianchini family (Amarildo Bianchini and Nilson José Bianchini). The farm comprises three adjacent areas, each with its own official entry in the rural land registry (Maps 10, 11, 12). They cover a total area of 13,744 acres in the heart of the Amazon. And yet Brazilian law (The Environment Ministry, or MMA) forbids the ownership of adjacent zones with different land registry plot numbers by a single landlord (Ministerio do Meio Ambiente, 2014).



**Map 10 :** Fazenda Bianchini Lote 01-A rural land register (North West)  
**Source :** Envol Vert (based on SICAR)



**Map 11 :** Fazenda Bianchini Lote 01-B rural land register (East)  
**Source :** Envol Vert (based on SICAR)



**Map 12 :** Fazenda Bianchini rural land register (North Central)  
**Source :** Envol Vert (based on SICAR)

FARM	2012	2013	2014	2015	2016	2017	2018	2019	Total
Fazenda Lote 1-B	479,2	80,9	43	155,9	32,5	57	0	0	848,5
Fazenda Lote 1-A	126	5,9	127	38,2	126	0	0	0	323,3

**Tableau 6 :** Total area deforested (in hectares) per year on the “Bianchini” farm  
**Source :** Envol Vert

Across the last seven years, IBAMA have imposed a total of R\$ 29 million (or 5,2 million euros) in fines on Amarildo Bianchini for violating environmental regulations on his farm “Fazenda Bianchini”.

Here are a few examples of the infringements over this period :

-In 2013, Amarildo Bianchini was fined for illegally chopping down 3202 acres of primary vegetation.

-In 2016 he was found guilty and sentenced for the same offence covering 212 acres (Map 14).

-He was also fined in 2013, 2015 and 2016 for not respecting the embargo imposed on his farms by IBAMA and leaving his livestock in pasture, preventing the natural regrowth of vegetation (Campos and Barros, 2020a).

The “Bianchini” farm areas under embargo from the environmental agency (IBAMA) cover the three different plots recorded on the rural Land Registry (Maps 13, 14, 15).

This family has a long history of environmental fines, of deforesting and of continuing to farm zones under embargo. Our investigators have calculated that a total of 2,893 acres (1171 hectares) of land have been deforested between 2012 and 2017, primarily in the North West and East plots (Lote 01-A and Lote 01-B, Maps 9 and 10) (Table 7).

Following these multiple irregularities and infractions, Amarildo Bianchini let his property to another farmer. The total area leased was 10,380 acres including 7,900 acres for pasture. This lease has been studied by the Federal university of Parana.

The new leaseholder, Gustavo Vígano Picoli, renamed the farm “Agropecuária GPC” (Ferrari, 2018). However, renaming a property does not remove State embargos. Below are the embargoed areas (IBAMA, 2020b, 2020c, 2020a) :



**Map 15 :** Third embargoed area  
**Source :** IBAMA



**Map 13 :** First embargoed area  
**Source :** IBAMA



**Map 14 :** Second embargoed area  
**Source :** IBAMA

This “new” farm has supplied many animals to abattoirs in the area, notably JBS. A significant quantity was sold by Agropecuária GPC to the JBS abattoir in Diamantino in the Mato Grosso between April 2018 et January 2020.

In addition to these direct sales, Agropecuária GPC, has also transferred livestock for fattening to “Pedra Farm”, another property owned by Gustavo Vígano Picoli in the Sorriso Province of the Mato Grosso. These animals were then sold on to JBS abattoirs in Colíder (2019) and once again in Diamantino (2018) (Campos and Barros, 2020a).

These sales occurred despite the fact buying livestock from an embargoed farm in the Brazilian Amazon violates not only the agreements signed between abattoirs and the MPF (Federal Prosecution Service) but also the Minimum criteria for Industrial Scale Cattle Operation in The Brazilian Amazon Biome agreement. This practice goes against GPA/Casino’s own due diligence plan on the purchase of sustainably produced beef, in particular with regard to direct farms.

**“Fazenda Lua Clara” in the Cerrado, directly linked to fresh meat sold in Cuiabá and 13 products sold under national brands.**

**FAZENDA LUA CLARA, CAMPOS DE JULIO (MT), CERRADO**

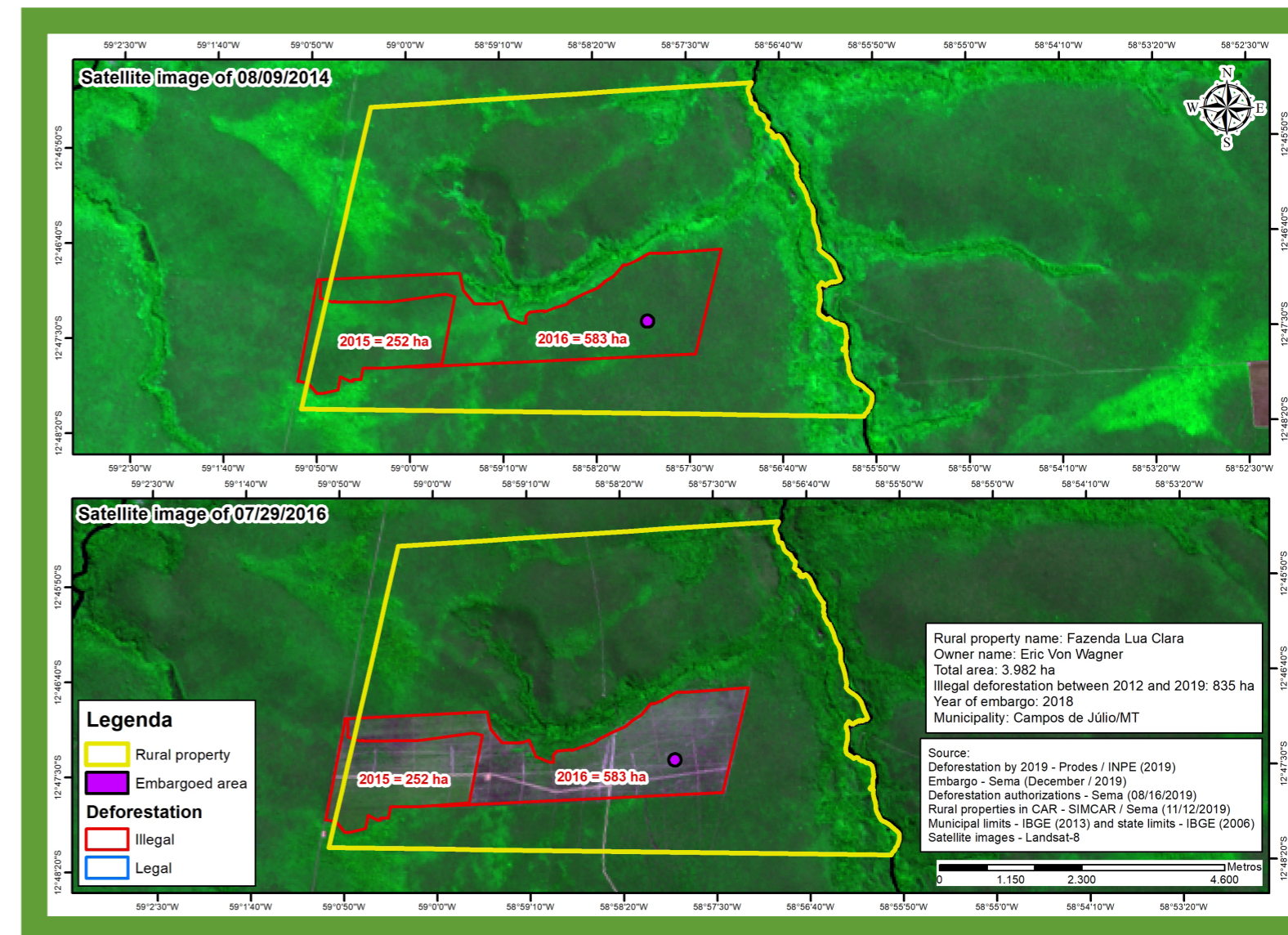
- 2063 acres of illegal deforestation
- Area under embargo in 2018
- Official documents showing the transport of livestock to the JBS abattoir in Diamantino.
- Fresh meat suppliers to GPA/Casino’s Extra stores in Cuiabá.

This is a noteworthy case as it relates to the Cerrado biome in Brazil. It should be noted that the TAC agreement, signed by JBS abattoirs and the MPF, prohibits the purchase of livestock coming from deforested areas and covers the entire Legal Amazon area. The Legal Amazon area includes biomes beyond the Amazonian forest, notably The Cerrado (JBS, 2013). Even though the official tool for recording deforestation in Cerrado only became available in 2018 (INPE, 2018), these transactions are nonetheless illegal. Furthermore, the GPA/Casino Group is a signatory to the Manifesto for Cerrado (GPA, 2017), in which businesses are required to reduce deforestation in The Cerrado biome (Manifesto do Cerrado, 2017). However, Casino Group procurement policy does not specifically mention monitoring or limiting deforestation in this biome.

The example presented here joins the dots between the Lua Clara farm in Campos de Júlio Province in the Mato Grosso and GPA/Casino’s Extra stores in Cuiabá. The main issue with this farm is once again that of illegal deforestation. The investigators identified 2,063 acres of forest (Campos and Barros, 2020b) which were destroyed and turned over to pasture for cattle between 2015 and 2016 (Map 16). As the owner did not have the legal authorisation required for this transformation we are once again looking at a case of illegal deforestation (Estado de Mato Grosso, 2005).

When the illegal deforestation was discovered by the authorities, the farm was placed under embargo in 2018 (Campos and Barros, 2020b).

Undisclosed official documents indicate animals were sent for slaughter to the JBS factory in Diamantino in July 2019 (Campos and Barros, 2020b). This transaction took place after the embargo notice was issued and is therefore recognised as illegal.



**Map 16 :** Lua Clara Farm, illegal deforestation and embargoed zone  
**Source :** Reporter Brasil and Envol Vert Investigation 2020

### B.1.3 FOCUS ON THE INVASION OF INDIGENOUS TERRITORY BY A FARM SUPPLYING ONE OF GPA/CASINO'S ASSAÍ STORES

#### FAZENDA JR, PARÁ, THE AMAZON

- 34 acres deforested illegally
- 8% of the affected area lies within a protected indigenous territory
- Official documents proving the transfer of livestock to the Marfrig abattoir in Tucuma
- In 2019, Chain Reaction Research and Reporter Brasil linked the Marfrig abattoir in Tucuma to an Assaí store in Recife

This case highlights a major issue which frequently blights this sector.

Brazil counts many indigenous peoples as part of its population (around 256 according to analysis from the Brazilian Institute of Geography and Statistics (IBGE) or However, r (Instituto Brasileiro de Geografia e Estatística, 2020). However, official government recognition is not enough to stop the invasion of these indigenous territories: loggers, farmers or even miners operate quite freely in these zones (Campos and Barros, 2020c).

A report published by the CIMI (Indigenist Missionary Council or Conselho Indigenista Missionário) highlighted the recent increase in attacks on indigenous populations (Beretz, 2019) :

“Early results from 2019 indicate that the first 9 months of Bolsonaro’s government saw 160 cases of invasion of territory, illegal use of natural resources and property damage across 153 indigenous territories. Double the number of the previous year.”

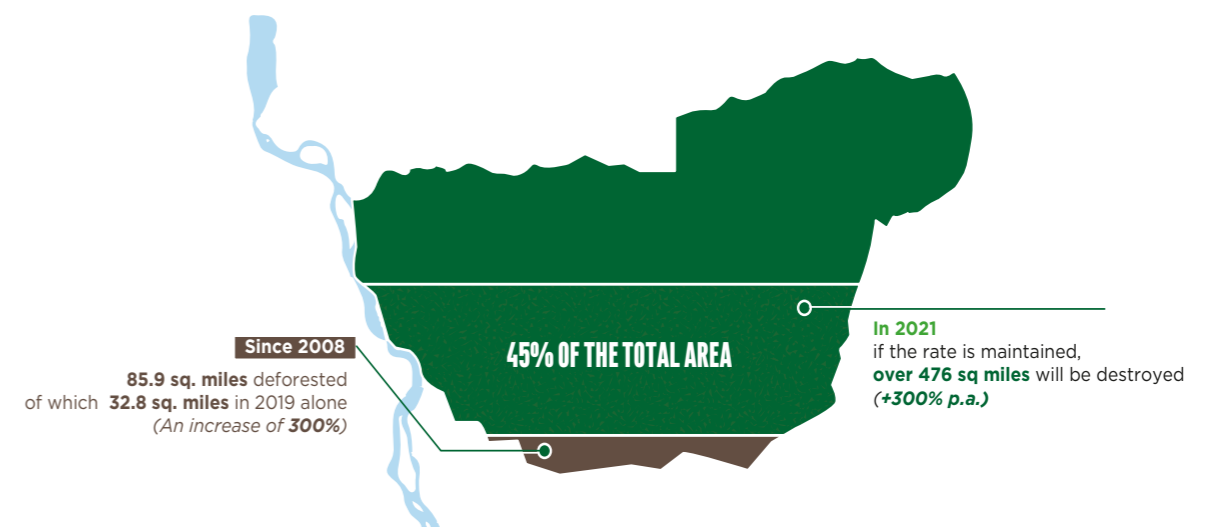
This particular case concerns José Roberto Alves Rezende, owner of a farm situated in the São Félix do Xingu municipality in the state of Pará. The farm includes deforested land of which 8.3% (about 34 acres) sits within the Apyterewa indigenous territory (Image 6).

In his original declaration to the Rural Land Registry, the owner tried to stake claim to a larger area of 247 acres situated within the territory. This claim, brought before the law courts, was considered by the Federal Prosecution Service (MPF) as having been made in bad faith by José Roberto Alves Rezende.

This is a far from unique incident in this territory as established by the Reporter Brasil (Campos and Barros, 2020c) ! The Apyterewa indigenous territory officially belongs to the Parakana people according to a decree issued in April 2007. Its population of indigenous people numbers 470. Nevertheless, this territory was subject to the second highest rate of deforestation and invasion from August 2018 to July 2019. The increase in deforestation in this territory across the last three years has almost reached the figure of 300% per year (PRODES (Desmatamento), 2020).

#### APYTEREWA INDIGENOUS TERRITORY

Source: TerraBrasilis (PRODES)



**Infographic 10 :** Increase in deforestation in the Apyterewa indigenous territory  
Source : TerraBrasilis (PRODES) and Envol Vert1 calculations

It is not only the habitat of these indigenous peoples which is destroyed, but also their livelihood and way of life. From July 20th to August 20th in 2019, in the middle of the Amazonian forest fire season, 116 fires were declared across the Apyterewa indigenous territory. This made the indigenous territory the fourth most affected during this period (Instituto Socioambiental, 2019).



**Map 17 :** Fazenda JR farm (in blue) encroaches on the Apyterewa indigenous territory (in red)  
Source : Reporter Brasil 2020

A federal court of justice officially condemned this invasion of an indigenous territory. The MPF states this decision now dates from 10 years ago. However, no effective measures have been implemented. “Farmers who have illegally acquired land but carry significant economic weight have invested in a legal battle against their eviction from the Apyterewa indigenous territory in order to delay their expulsion” (MPF, 2020).

The MPF has filed a complaint against FUNAI (National Indian Foundation) requesting the imposition of a daily fine of R\$5000 until all illegal occupants have left the territory (MPF, 2009). As a result, FUNAI has been forced to reassign a working group to work on the eva-

uation of this area, a project abandoned several years ago (Campos and Barros, 2020c).

It is thanks to the investigations led in 2019 by Reporter Brasil and Chain Reaction Research that a link has been established between deforestation at the heart of indigenous territory and products sold by GPA/Casino. Their reports show between May 2018 and December 2019, much livestock was sent to the Marfrig abattoir in Tucuma. This abattoir in turn supplied frozen products to the Assaí store in Recife (Faggin et al., 2019).

The Marfrig company was contacted by Reporter Brasil's investigators in May 2020 and themselves confirmed this transaction as genuine. However, this giant of the meat-processing industry denies any responsibility and highlights the 10% margin of error of the mapping tools used to define the co-ordinates of the farm in question (Campos and Barros, 2020c, Marfrig, 2020).

This is not an isolated incident. FUNAI calculated in March 2016 the illegal arrival of almost 50,000 head of livestock and 1175 illegal occupants in the indigenous territory. Some 75% of the latter (or 883 people) are considered by the courts to be occupying illegally and in bad faith: they therefore have no claim on the land within the zone (Campos and Barros, 2020c).



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## VII. IT'S 2020 AND TIME FOR SOME ACTION! CASINO GROUP MUST BRING MORE SUSTAINABILITY TO ITS SUPPLY CHAIN

Envol Vert has already appealed for more discipline in Casino Group's beef procurement policy in France (December 2019) and also Exito in Colombia (October 2019). Since then, no concrete, public shift in policy has been noted, although a few meetings with local Brazilian businesses have taken place. Since receiving a letter outlining the main results of our enquiry and a list of demands, Casino Group has informed Reporter Brasil that it is a member of the working group of indirect suppliers (known as GTFI). However, the results of our enquiry show various products, born from deforestation are present in GPA/Casino's stores. Envol Vert is demanding Casino Group

take strict measures to achieve genuine results and to make these public as part of its Duty of care plan for ethical sourcing.

To implement its new policy, Casino Group must follow the recommendations of the Afi (Accountability Framework Initiative, 2016) concerning the framework for a responsible private sector.

### A. POTENTIAL IMPACT OF CASINO GROUP ON THE NATURAL ECOSYSTEMS OF THE BRAZILIAN AMAZON IN 2019

Envol Vert conducted the analysis which should be carried out by Casino Group's own due diligence and ran risk analysis to measure the Group's potential impact on the Brazilian Amazon in 2019, a year which has seen many forest fires in the Amazon.

#### Estimate of GPA/Casino's impact on the Amazon forest in 2019 :

The approach adopted was the most conservative possible, with the objective of minimising the Group's impact. All the figures used in this estimation come from recent reports and official data sources.

Official data from PRODES were used to estimate the surface area deforested within the Legal Amazon in 2019 : 976 200 ha or 2,412,000 acres (INPE, 2020a).

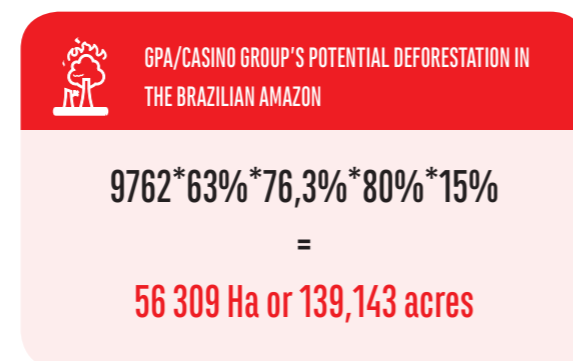
The percentage of this deforested area caused by the creation of pasture for livestock needs to be calculated. According to multiple scientific bodies this fluctuates between 60% and 80% of the deforested area (CIRAD, 2020 ; INPE 2014 ; IPAM)<sup>1</sup>. World Resources Institute Hansen et al (2019) ranks cattle ranching as the main cause with a responsibility for 63% of deforestation (Butler, 2020).

The result of this first calculation is then multiplied by the percentage of meat consumed locally in Brazil. THE ABIEC report on beef consumption published in 2020 indicates 76.3% of all beef consumed in Brazil is consumed locally (ABIEC, 2020).

This number is then multiplied by the share of meat sold by retailers in Brazil and more specifically by the Grupo Pão de Açúcar (GPA). This figure comes from a declaration of the Foreign Agricultural Service of the USDA (US Department of Agriculture) published in 2019 which sourced most data from ABRAS (The Brazilian Supermarket Association) (ABRAS, 2019, USDA Foreign Agricultural Service, 2019). **The retail sector accounts for 80%** of food and drink sales across the country. Finally, the calculation applies the Brazil market share of Groupe GPA/Casino which was **15% in 2018** according to ABRAS's "500 ranking" (ABRAS, 2019, USDA Foreign Agricultural Service, 2019).

So, it is possible to estimate the surface area of Amazonian forest destroyed in Brazil in 2019,

and potentially linked to meat products sold in Groupe GPA/Casino stores if no specific policy was implemented.



**The total surface area of Brazilian Amazon destroyed in 2019 due to cattle ranching to produce beef sold in GPA/Casino Group stores is the equivalent to more than 5 times the size of Paris !**

This figure shows France's Casino Group holds significant responsibility for deforestation in the Brazilian Amazon. Knowing that 59% of deforestation occurs on indirect livestock suppliers, why is Casino Group not pursuing any prevention policy?

The question is also valid for the Cerrado and Colombia which are also not covered by the Casino Group's policy.



## B. ENVOL VERT'S DEMANDS TO CASINO GROUP : UNDERTAKE IMMEDIATE, GENUINE ACTION IN LINE WITH THE HIGH STAKES

### A public commitment against deforestation

Casino Group must present its **NDPE Policy (Non-Deforestation, Non-Peat and Non-Exploitation)** publicly and as soon as possible. The policy must contain a commitment to produce or source raw materials without not only clearing of forests but any clearing or conversion of natural vegetation. This would indicate the policy seeks to protect not only the forest but also other natural ecosystems including The Cerrado, The Gran Chaco and The Orinoco.

#### • Set time-bound objectives and shared, monitored measurement

The Group's new engagements should apply to the entire supply chain, **including indirect livestock suppliers**. The latter represent the lion's share of the beef market in South America and should therefore be a priority. Given the urgency surrounding the deforestation linked to beef, it is important the actions proposed by the **NDPE policy** are launched as soon as possible in order to reach the objectives **by 2022 at the latest**.

Group objectives must have a clear calendar, be applied on the ground and easily quantifiable.

- **List in detail the principle undertakings related to stopping deforestation, protecting all natural ecosystems and respecting human rights.**

These undertakings must be supported with hard actions and results, **including deforestation deadlines** for each commodity, principally beef, beyond which any natural conversion of the ecosystem is not accepted by the purchaser. These deadlines must be applied to all ecosystems. As an example, for Brazilian beef, the deforestation deadline for beef from the legally defined Brazilian Amazon region should be **October 2009**, meaning that any beef from a farm which was deforested after this date is considered as contributing to deforestation. **These deadlines should also be applied to beef originating from The Cerrado or other ecosystems.**

As a minimum these undertakings must apply to **all products sold by Casino Group containing raw materials** as identified by the “National Strategy against Imported Deforestation” (SNDI) (Ministère de la Transition écologique et solidaire, 2018). Using beef as an example this would include **fresh and processed meat products**. The undertakings should apply **to all stores, whether in France or South America.**

These commitments and action plan must include all Group activities, in particular those concerning

**beef in Brazil and in Colombia.**

A **specific plan for national brands** should be drawn up and made public to ensure the exclusion of products which do not respect Group policy standards.

Concerning Human Rights and workers' rights, Casino Group must commit to respect the **rights of indigenous peoples and local communities** in all their sourcing operations. Specifically, Casino Group must ensure free, prior and informed consent (**FPIC**) has been obtained before any activity or transaction originating on their territories. Furthermore, **no conversion of a natural or protected ecosystem on indigenous lands should be permitted** within Group Casino's supply chain (including direct and indirect suppliers, own and national brands).

## C. STRONG MEASURES IMPLEMENTED FROM TODAY

**A**n effective rollout across the whole business of the undertaking against deforestation

The Group must hold liable its management and Board of Directors to respect these undertakings and to make public all progress and results.

These commitments must also be directly integrated in the decision-making process of all Group activities.

The political backing for these significant functional changes hinges on a strategic intent to act, notably with the **creation of specific positions**. These Group engagements should be **publicly promoted by management during key events** in South America and France such as the IUCN World Conservation Congress in Marseille in January 2021.

- **Risk evaluation and traceability including indirect livestock suppliers**

**Provenance of indirectly acquired raw materials** in the supply chain must be known and checked to ensure production and processing entities supplying the Group are **respecting NDPE criteria**. This information must be sufficient to determine the extent and nature of any irregularities requiring resolution over time.

As regards the beef market, this means Casino Group itself will itself assess the direct and indirect suppliers in its supply chain. As a minimum it will conducting its own sampling in the regions and in the deforestation frontlines known to be at the highest risk. It should no longer simply accept the sampling conducted by the abattoirs themselves.

**Traceability tools such as VISIPEC already exist to provide supply chain visibility and identify indirect suppliers. These tools should be integrated in Group policy and applied, without exception, by all Group suppliers under penalty of a reduction in market share. Un-**

**til total traceability can be assured, Casino Group should refrain from purchasing from abattoirs sourcing from the Legal Amazon.**

In Colombia, Éxito/Casino should **develop its own traceability tools** to monitor every link in the supply chain. This entails making radical changes to current supply chain practice, notably reducing the number of intermediaries.

- **Managing supplier compliance**

To reactively and proactively identify and resolve issues of non-compliance a supplier warning system linked to the warnings from civil society must be put in place to monitor the behaviour of direct AND indirect supplier farms. This system should publicly reveal cases and ongoing claims of non-compliance on a **Dashboard on the Casino Group website** as is currently the case for palm oil.

In cases where undertakings have not been respected, Casino Group protocol should include a process of suspending and excluding suppliers from the supply chain.

**Casino Group suppliers, notably JBS, must develop a better system to monitor their supply chains.**

Compliance criteria for suppliers seeking to respect commitments to the Group should no longer be defined in terms of means but rather of results. This implies an effective change in the auditing which has proved to be failing. Furthermore, Casino Group must propose an **external evaluation of the supply chain by a testing committee** to evaluate robustness of





the various audits. This testing committee should include **civil society**. Casino Group should put in place **additional audits of those abattoirs most at risk, notably those mentioned in this report**.

This should be the case for **all products sold by the Group, all own brand products and a sample of nominated national brands**. Casino Group will inform all national brands sold in its stores that **only products tested in accordance with their standards will be accepted in store, as is currently the case for Naturalia in France. The group should implement a process, open to the public, of evaluating national brands**.

When suppliers are found to be failing to comply with Casino Group policy, remedial actions and trade measures should be envisaged and planned for.

Hence, measures should be implemented as a result of the findings of this report.

- **Actively engage in field project initiatives in the areas of the law, landscape or the industry to help honour commitments made and demonstrate products sold are compliant**

Casino Group should contribute to initiatives in the industry, the landscape and the law in answer to the social and environmental challenges faced. The Group is called upon, given its destructive impact on the forest and indigenous populations, to **establish a grass-roots project on a scale that is at least equi-**

**valent to the beef sector related impact of Casino Group and to do this in both Colombia and Brazil**. These projects should be set up and sustained mainly by Casino Group. NGOs should be involved in the monitoring of these two projects.

These projects should be new projects which aim to effect real change on site and themed around silvopastoralism, forest preservation and the protection of the indigenous territories. They should be on a par with the Group's footprint in the first and second most biodiverse countries in the world.

**Leadership** : Casino Group must make a public and active commitment to the question of traceability tools. Specifically, it must lobby the Brazilian government in favour of **total product transparency such as that provided by the data from tools like GTA** (Guia de Trânsito Animal).

It is the government which effectively holds the key to unblocking this situation, but Casino Group as a major player in the sector has an opportunity to publicly demonstrate its influence.

In Colombia agreements are already in place via the round table of the livestock farming sector and coordinated by institutional players as agreements for zero deforestation cattle ranching. Éxito/Casino should **actively and financially participate in developing a national traceability system**.

- **Repair past damage caused to natural ecosystems, people or communities**

The Group must commit to **repair all damage caused by its suppliers** who flout their obligations, impinge on Human Rights or damage the environment. An efficient system enabling the public to register complaints must be set up to ensure access to compensation.

## D. INFORM THE PUBLIC OF PROGRESS MADE

An open platform should be launched in Group Casino's website following the model of dashboards established for other raw materials at risk of causing deforestation.

- **Examine supplier compliance in a credible manner**

Regular monitoring of each commitment made by Casino Group must be undertaken. Each commitment must include, as demanded by the Afi, measurable objectives, corresponding timing, expected results as well as a mechanism to reduce activity with or exclude a supplier when necessary. The methodology must be fit for the purpose of evaluating social, and environmental results as well as the use of land linked to the commitments. **Audit reports must be made public** and a consortium of independent stakeholders (selected

from the committee) must be assembled and informed of the results achieved within an agreed timeframe.

- **Report progress and results on Group commitments**

**Every six months progress on and results of the implementation of Group commitments will be made public**. The Group objective must be to reach zero deforestation and conversion **as soon as practicable and no later than 2022**. These publications must make reference to common definitions and good practices to ensure the information shared is precise and verifiable. Group announcements concerning progress or performance must be substantiated by credible and independent sources (third parties from the committee).

## VIII. CONCLUSION

Casino Group was supposed to have implemented a plan to “allow for risk identification and for the prevention of severe violations of human rights and fundamental freedoms, serious bodily injury or environmental damage or health risks resulting directly or indirectly from the operations of the company and of the companies it controls within the meaning of Article L.233-16, II, as well as from the operations of the subcontractors or suppliers with whom it maintains an established commercial relationship, when such operations derive from this relationship”.

With the increase in deforestation, forest fires and invasion of indigenous lands in Colombia and Brazil, Casino Group can no longer hide behind its French commitments and strong organic sales figures. Group Casino’s South American subsidiaries’ turnover now exceeds that of their French operations. Communicating about its commitments in France does nothing to compensate the considerable impact Group Casino is generating in the two most biodiverse countries on the planet. “Nourishing a world of diversity” is also about sustaining our planet’s biodiversity and forests.

Envol Vert has highlighted 4 cases of illegal deforestation in Brazil, in the Amazon and The Cerrado, involving 52 products sold on the shelves and the butcher’s section of two stores. These investigations were conducted across a sample which represents approximately 1% of Group Casino’s stores in Brazil. Many other investigations

can also confirm the following: **by not including monitoring of indirect supplier farms and delegating the monitoring of direct supplier farms to the abattoirs, deforestation is hugely present on the beef shelves of Brazil.**

In Colombia, the situation is even more worrying: despite the weak level of in-country traceability, Casino Group has no policy in place to combat deforestation in its beef supply chain.

This is why Envol Vert is demanding Casino Group, N° 1 retailer in Brazil and Colombia, put an immediate end to its double standards. It’s long overdue that the image of a committed supplier in France be matched by real and impactful measures to protect South America’s biodiversity and forests. Casino Group must adopt:

- **A robust policy of zero deforestation** (Non deforestation, Non-Peat, Non-Exploitation) to reach zero deforestation in its supply chain by 2022. This policy must apply to the entire beef supply chain (fresh meat, own brand, national brands and processed products) **across the entirety of South America.** The full policy must be set out in the duty of care plan and include Colombia and The Cerrado biome.
- **Immediate inclusion of indirect supplier farms** in the policy and apply specific dates of reference for each relevant ecosystem
- A groupwide obligation to only source meat from **abattoirs using a tool (verified by recognised independent third parties) which monitors 100% of direct and indirect supplier farms** and who also make public the provenance of their meat, details of any audit and methodology. All audits must focus on observed results.
- **Additional due diligence commissioned by Casino Group of the audits conducted by the**

**abattoirs** combined with a **public complaint mechanism regarding the practices of abattoirs and farms.**

- The launch of a **public, beef sourcing dashboard** which shows the ongoing claims process (including the option to cease trading), the abattoirs concerned, beef provenance and any remediation procedure
- The establishment, by the end of 2020, of **two new field projects** for the protection of forests and development of alternatives to deforestation in Brazil and Colombia and whose ambition matches the scale of environmental and social damage already caused.
- A **committee made up of third parties, including civil society**, set up by Casino Group and **regularly informed by them** to ensure process robustness and implementation through to 2022.

This report highlights the detrimental impact of “cattle laundering” and the overriding role indirect suppliers play in deforestation. Traceability solutions to monitor indirect supplier farms already exist but need to be scaled up, implemented and supported accordingly.

Indeed, this is why Envol Vert is demanding Casino Group publicly support and promote the use of these tools by members of the Brazilian Supermarket Association (ABRAS) and lobby for full transparency of the data used for tracing (Guia de Trânsito Animal) from farm to finished product to the current Brazilian government and the various State administrations in The Amazon. In Colombia, Casino Group must **support the set-up of rigorous product tracing in the beef sector with a dedicated team and funding.**

Lastly, the French Corporate Duty of Vigilance Law (2017) gives NGOs, trade unions, commu-

nities and victims the legal wherewithal to demand accountability from French decision-makers for human or environmental damage around the planet. This report could invoke its application given the information contained within.

Envol Vert appeals to the government to ensure this law lives up to the expectations of civil society regarding the accountability of French corporations. New, ambitious and binding legislation is called for, notably concerning the duty of vigilance at a European level. It must apply to all businesses with a potential for negative impact based on the sole criterion of using a raw material at risk, be it directly or indirectly.

There are some signs of positive change, such as the European Union’s decision to protect biodiversity within the Union. However, it is about time, even more so after this pandemic linked to deteriorating ecosystems, that States and corporations assume their responsibility to protect what is left of the forests and biodiversity.



## IX. ACKNOWLEDGEMENTS

During a year of investigation and work on this campaign, Envol Vert has collaborated with multiple partners, volunteers and associations. We would like to warmly thank them all here for their help and belief in this project. Our thanks go equally to those who we can quote and to those who we can't for reasons of security and to protect our sources.

Firstly, Envol Vert would like to thank our field-work partners in Brazil, in particular the teams from Reporter Brasil and Instituto Centro da Vida for their effort and engagement in this campaign. Their intricate knowledge of the mechanics and issues present in the beef supply chain in Brazil have enriched this report.

Envol Vert also thanks the Aidenvironment team, part of Chain Reaction Research for their advice, experience and help with tools used to analyse the cases identified.

In Colombia, Envol Vert thanks Ecosocial in particular for their knowledge of the sector and for making their resources available.

The Canopée team helped develop campaign visuals and supported Envol Vert in our report

and investigation. Other donors also contributed to the finance of our investigation in Brazil.

Finally, Envol Vert warmly and sincerely thanks every volunteer who made this project a success for the association : Emilie Bechat, Audrey Benard, Matthew Carr, Steve Duhamel, Elie Favrichon, Aurore Fournier, Véronique Ginoux, Flora Goldgran, Olivier Guichardon, Marine Humbert, Carine Kindarji, Solène Outters, Boris Patentreger, Deidamia Pelé, Abbes Rabaa, Daisy Tarrier, Laura Van der Ven, Sarah Waïche et Sarah Wolf.

Their contribution has been essential from the beginning in order to conduct this investigation. Their time and motivation as well as their unfailing support give meaning to what we do and to our organization.

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