



# Before It's Too Late

*Curbing Cattle-Driven Deforestation and Rights Abuses in Brazil*

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**CRI** CLIMATE  
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## Glossary

**AB+S (Agro Brasil + Sustentável):** A federal platform launched in 2024 to centralize socio environmental compliance data for rural properties across Brazil.

**Beef on Track (Boi na Linha):** An initiative launched in 2019 by the Brazilian Federal Prosecutor's Office (MPF) and the NGO Imaflora to improve monitoring of cattle supply chains, providing transparency tools and standardized criteria to help slaughterhouses, retailers, and civil society ensure compliance with Brazil's "Beef TAC" agreements.

**Beef TAC (Termo de Ajustamento de Conduta da Pecuária / Cattle Conduct Adjustment Agreement):** A legally binding agreement established by Brazil's Federal Prosecutor's Office (MPF) that requires slaughterhouses who sign on to it to exclude from their supply chains cattle sourced from farms involved in illegal deforestation or invasions of Indigenous lands, or from individuals or companies included in Brazil's "Dirty List."

**CAR (Cadastro Ambiental Rural / Rural Environmental Registry):** Brazil's mandatory electronic registry of rural properties that records land boundaries, land use, and legally protected areas, serving as the basis for monitoring compliance with the Forest Code and other environmental obligations.

**Cerrado Protocol (Protocolo de Monitoramento de Fornecedores de Gado do Cerrado):** A voluntary framework launched in 2020 by the Federal Prosecutor's Office (MPF) and Imazon to guide slaughterhouses in monitoring cattle suppliers in the Cerrado biome, using standardized socio-environmental criteria to block purchases from farms linked to illegal deforestation, slave labor, or invasions of protected lands.

**CPT (Comissão Pastoral da Terra / Pastoral Land Commission):** A Catholic Church-affiliated NGO that documents rural violence, land conflicts, and labor exploitation in Brazil.

**Dirty List (Lista Suja):** A public registry maintained by Brazil's Ministry of Labor and Employment identifying employers found to have subjected workers to conditions analogous to slavery.

**Environmental Embargo:** A restriction imposed by environmental authorities (like IBAMA) that prohibits economic activity on land found to have undergone illegal deforestation or other environmental violations.



**Forest Code** (Código Florestal): Brazil's primary law regulating the conservation of native vegetation on rural properties.

**FUNAI** (Fundação Nacional dos Povos Indígenas / National Indigenous Peoples Foundation): Brazil's federal agency responsible for protecting Indigenous rights and demarcating Indigenous Territories.

**G4 Agreement** (Beef Public Commitment): A 2009 agreement negotiated by Greenpeace with Brazil's four largest meatpackers committing the companies to exclude suppliers linked to illegal deforestation, forced labor, and Indigenous land invasions across the Amazon.

**GFTI** (Grupo de Trabalho de Fornecedores Indiretos / Indirect Suppliers Working Group): A task force created in 2019 by Brazil's Federal Prosecutor's Office (MPF) that brings together slaughterhouses, leather companies, supermarkets, banks, and civil society to develop tools for monitoring indirect cattle suppliers and closing gaps in supply-chain traceability and compliance.

**GTA** (Guia de Trânsito Animal / Animal Transit Guide): An official animal transport permit mandated by Brazilian law for the movement of cattle and other livestock between farms, municipalities, or states.

**IBAMA** (Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis / Brazilian Institute of the Environment and Renewable Natural Resources): The federal agency responsible for enforcing Brazil's environmental laws.

**MPF** (Ministério Público Federal / Federal Public Ministry): The Federal Prosecutors Office of Brazil.

**MPT** (Ministério Público do Trabalho / Labor Prosecutors Office): The Federal Labor Prosecutors Office responsible for the protection of labor rights in Brazil.

**PNIB** (Plano Nacional de Identificação Individual de Bovinos e Búfalos): A federal program announced by the Ministry of Agriculture in 2024 to establish electronic tagging of every animal and create a centralized database, with the goal of enabling full life-cycle traceability of cattle throughout the country by 2032.

**Selo Verde** (Green Seal): A state-level system, first launched in Pará in 2021, that cross-references GTA, CAR, and other public data to assess cattle supply chain risks and classify properties as green, yellow, or red based on links to deforestation or other violations.

**SISBOV** (Sistema Brasileiro de Identificação e Certificação de Bovinos e Bubalinos / Brazilian System of Identification and Certification of Bovine and Bubaline

Animals): A federal cattle identification and certification system, created in 2002 to meet export market requirements—especially for the European Union—by registering farms and individually tagging animals to verify their sanitary status and origin.

**Visipec:** A traceability tool developed by the National Wildlife Federation and partners that integrates existing government and company data (such as GTA animal transit permits and CAR property records) to help meatpackers and retailers identify and monitor indirect cattle suppliers in Brazil's supply chains.

## Summary

*“Here cattle are treated better than workers.”*

— João, a rescued worker

*“We used to live from fishing and hunting. Today, when we go to hunt, there's only cattle, cattle raising, pasture.”*

— Chief Maurício Krikati

*“When illegal deforestation is found, we generally also find workers in conditions analogous to slavery.”*

— Federal Labor Prosecutor

Brazil has proven, in the past, that it can be a global leader in forest conservation. More than a decade ago, the country reduced deforestation by 80 percent. But that progress eventually unraveled, and by 2022 the annual rate of forest loss had more than doubled. Although recent government action has again slowed deforestation, Brazil's standing as an environmental leader remains uncertain as it prepares to host COP30 in November. The stakes—for Brazil and for the planet—could not be higher.

Brazil is home to roughly 60 percent of the Amazon, the world's largest terrestrial carbon reserve. Despite the recent progress, the destruction of the Amazon continues at a dangerous pace. Scientists warn that the rainforest is headed toward a “tipping point” where vast areas could dry out, unleashing ecological and economic havoc in Brazil and releasing massive amounts of carbon into the atmosphere, with potentially catastrophic consequences for global efforts to contain climate change. The country's other forested biomes face mounting risks as well—most notably the Cerrado, a vast savanna with significant carbon reserves, where deforestation rates also remain high.

“We inherited a train speeding toward a cliff,” the current president of Brazil's federal environmental enforcement agency told Climate Rights International earlier this year. “We've slowed the train, but we're still headed for disaster.”

Brazil's ability to reverse this trajectory is constrained—according to senior Brazilian officials consulted by Climate Rights International—in large measure because the agencies responsible for enforcing the country's environmental laws cannot compete with the economic forces driving the deforestation. The profits to be made producing cattle on illegally cleared lands are among the primary factors thwarting progress.

Behind these profits lies a dark reality: cattle-driven deforestation in many parts of Brazil is fueled by egregious human rights abuses—including the use of forced labor and invasions of Indigenous lands. These abuses are not incidental to Brazil's forest destruction. By keeping labor costs artificially low or usurping Indigenous lands, ranchers engaged in illegal deforestation increase the likelihood that their environmental crimes translate into financial gain.



Cattle stand in São Félix do Xingu, Pará, one of the municipalities in Brazil with the highest rate of deforestation. Credit: Daniel Wilkinson for CRI.



Saving the Amazon and Brazil's other forest biomes will require altering this perverse economic equation. One of the surest ways to do so, according to Brazilian officials and environmentalists, is by preventing the commodities linked to cattle-driven deforestation and human rights abuses from accessing lucrative markets. In recent years, some Brazilian exporters—and some of their international buyers—have taken steps in this direction, but their efforts have fallen far short of what's needed.

This report examines the role of human rights abuses in fueling cattle-driven deforestation in Brazil. It explains why efforts by beef and leather companies to eliminate these harms from their supply chains have been inadequate, and why their promises to do better remain unconvincing. And it outlines how the Brazilian government could both facilitate and compel more effective due diligence—and more sustainable production—throughout the cattle sector.

Today, Brazil has the tools it needs to make its cattle supply chains more transparent and sustainable. Government officials and industry leaders must choose whether to deploy them effectively—or allow abusive and unsustainable practices within the cattle sector to continue pushing the country down the path toward ecological disaster.

## Forced Labor

Ranchers clearing Brazil's forests frequently subject their employees to forced labor and other forms of severe labor exploitation—referred to in Brazilian law as “conditions analogous to slavery.” Workers are lured to remote forest areas with the promise of decent jobs and instead find themselves toiling long days under harsh and often dangerous conditions. Overworked and underpaid, they are deterred from leaving by economic coercion, threats of violence, and the daunting distances they would have to travel by foot to escape. Since 1995, federal labor inspectors have rescued more than 17,000 people from forced labor or other “conditions analogous to slavery” on cattle ranches—with a large portion of these cases concentrated in the regions of the Amazon rainforest where deforestation is most intense and persistent.



A cowboy hat hangs on the wall of the house of a man recently rescued from forced labor. Most workers are afraid to speak publicly about their experience for fear of retribution. Credit: Fernando Martinho for CRI.

This report highlights recent cases of workers rescued from cattle ranches. In one of these, federal labor inspectors rescued five workers—including a 15-year-old boy—from a farm in São Félix do Xingu, Pará, more than 200 kilometers from the nearest town. The workers had been living under crude plastic tarps without sanitation and working with chainsaws without protective equipment. Their only source of water to drink and bathe in was a visibly dirty stream also used by cattle and wild animals. The workers had no way to communicate with or leave for the outside world on their own. During their rescue, workers interviewed by the inspectors insisted on anonymity fearing retaliation from the rancher if they spoke openly.

In another case from Pará, federal labor inspectors rescued two men from a ranch, almost 70 kilometers from the nearest town, where they had lived in an unfinished building with a dirt floor and no toilet. Their drinking water was stored in repurposed pesticide containers labeled "DO NOT REUSE THIS PACKAGE." Their work included

applying toxic pesticides, known colloquially in Portuguese as “Mata-tudo” (“Kills-everything”), without safety training or protective equipment.

One worker told Climate Rights International that the owners of the property where he had recently been rescued were known to be “dangerous people” with connections to a band of “killers” that operated out of a neighboring municipality. He and his fellow workers knew they were being mistreated—going unpaid while working excessively long hours, sleeping under a tarp, and drinking water they believed to be polluted—but they remained silent about their plight out of fear for their lives.

## Indigenous Land Invasions

Cattle-driven deforestation also entails assaults on the rights of Indigenous peoples in many parts of the country. Indigenous territories are often among the most effective barriers to forest loss in Brazil, yet they have long faced incursions by outsiders seeking to use their lands, often as pasture for grazing cattle. As of 2020, invaders had sought to lay claim to more than 120,000 square kilometers of Indigenous lands across Brazil—an area nearly three times the size of Switzerland. The invasions not only destroy ecosystems but also undermine Indigenous communities’ autonomy, exposing them to violence, threats, and the loss of their traditional livelihoods.

The Krikati Indigenous Territory in Maranhão state is one of those that has been targeted. On a visit to the territory in May 2025, Climate Rights International observed large tracts of pasture and freshly cut forest within the invaded areas. Since 2017, outsiders have cleared more than 13 square kilometers for pastures and permanent settlements, cutting the community off from fishing and hunting grounds that have sustained their families for generations.

“We used to live from fishing and hunting,” Chief Maurício Krikati told Climate Rights International. “Today, when we go to hunt, there's only cattle, cattle raising, pasture.” He and other community members said that the deforestation has dried up streams and rivers that were traditionally significant fishing grounds, while destroying areas used for foraging and collecting. They are now often afraid to move through their ancestral lands due to repeated threats and acts of intimidation

“For us to enter [some of these areas], we have to cut a padlock, and they tell us that if we cut it or force our way in, they'll shoot,” Chief Maurício said.



Chief Maurício Krikati stands in front of the entrance sign to the Krikati Indigenous territory. The land was demarcated and legally finalized in 2004 but has suffered from invasions by outside farmers and ranchers. Credit: Fernando Martinho for CRI.

## Contamination Risk in Global Supply Chains

This report traces links between deforestation, labor abuse, and invasion of Indigenous lands in the Brazilian cattle sector and the supply chains of major global fashion and footwear brands active in Europe, the United States, and other foreign markets.

An investigation undertaken with Repórter Brasil documented ten recent cases in which cattle ranches implicated in deforestation, labor abuses, and/or invasions of Indigenous territories entered the supply chains of major Brazilian meatpackers. In eight of these cases, labor inspectors found that the ranchers had subjected their



workers to “conditions analogous to slavery.” In the other two cases, environmental inspectors found ranchers raising cattle illegally within an Indigenous territory. In four of the ten cases, there was also evidence linking the cattle ranchers to illegal deforestation.

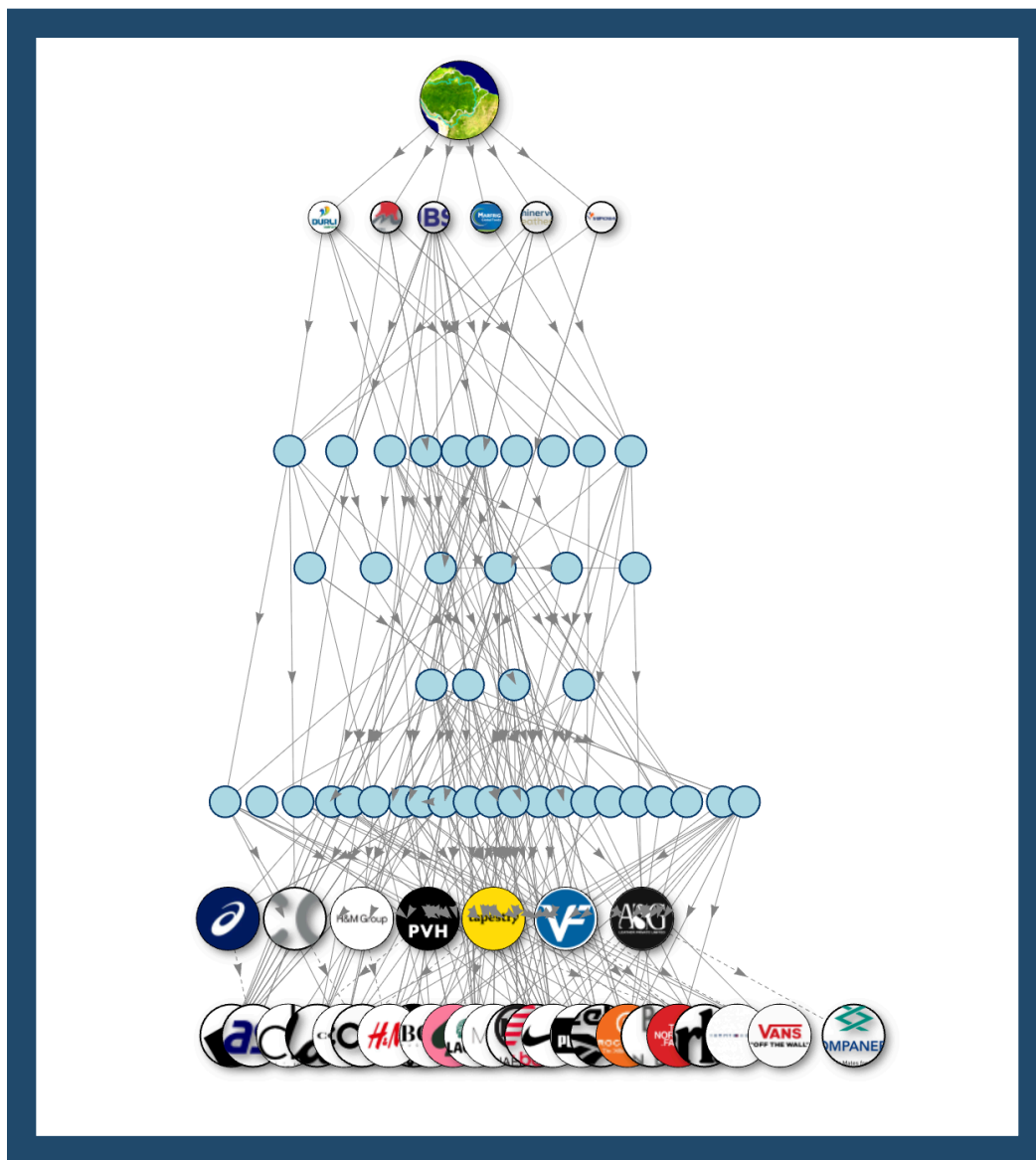
These cases illustrate some of the ways in which cattle producers involved in illegal deforestation or human rights abuses can enter the supply chains of Brazilian meatpackers: some sold their cattle directly to major slaughterhouses, but most were indirect suppliers, selling or moving the cattle to intermediary farms that then sold to the slaughterhouses.

The cases also illustrate how such producers can enter the supply chains of tanneries that export leather worldwide—including to the suppliers of major fashion and footwear brands. The slaughterhouses identified in the ten cases supply hides to tanneries—either their own facilities or those of other companies—that export to international markets. These include tanneries operated by **Durlicouros**, **JBS**, **Marfrig**, **Mastrotto**, **Minerva**, and **Viposa**.



Truck drivers outside the JBS plant near Marabá wait to unload cattle. Credit: Fernando Martinho for CRI.

An investigation by Stand.earth Research Group on behalf of Climate Rights International found 24 international brands linked through their 2023 and 2024 supply chains to tanneries operated by one or more of these six companies. These include athletic footwear and apparel brands such as **Adidas, Asics, Converse, New Balance, Nike, Puma, Reebok, Rockport, The North Face, and Vans**, as well as fashion and apparel brands including **Calvin Klein, Clarks, Coach, ECCO, H&M, Hugo Boss, Kate Spade, Kompanero, Lacoste, M&S, Michael Kors, Ted Baker, Timberland, and Tommy Hilfiger**.



The supply chains linking these brands with the tanneries can be seen in an interactive graphic visualizer prepared by Stand.earth Research Group found [here](#).

The supply chain connections documented by Stand.earth Research Group do not prove that any individual brand used leather from a specific tannery, or leather produced by the farms implicated in these cases. They do, however, demonstrate that these brands' supply chains include producers implicated in serious environmental and human rights harms.

Under international norms, the companies that own these brands have a responsibility to detect and mitigate environmental and human rights abuses in their supply chains. Some of them have attempted to meet this responsibility by trying to trace the supply of the Brazilian leather they use to its source. Others have adopted policies barring the use of leather from Brazil in their products. For many, it is unclear what steps, if any, they are taking to monitor their leather supply. Regardless of the approach, the complexity of global supply chains for leather and the lack of full traceability of cattle within Brazil currently make the risk of contamination from Brazilian leather linked to illegal deforestation and abuse virtually impossible to eliminate.

The ten cases documented in this report are not isolated instances. A review by Climate Rights International of more than 40 publications by civil society organizations and journalists found more than 340 reported cases over the past decade connecting the supply chains of major Brazilian exporters of beef and leather to cattle producers implicated in illegal deforestation and/or human rights abuses. (See Appendix A for a list of these reports.) These include more than 280 cases involving illegal deforestation, more than 50 cases involving forced labor and/or other forms of severe labor exploitation, and more than 50 cases involving Indigenous land invasions.

Moreover, interviews conducted by Climate Rights International with dozens of Brazilian experts—including senior government officials, cattle industry representatives, civil society leaders, and academics—confirmed that the cases reflect a systematic failure of Brazil's cattle sector, and of international buyers of its exports, to ensure that supply chains are free from illegal deforestation and human rights harms.

## The Way Forward

Brazil has made important strides toward addressing the interrelated problems of deforestation and abuses within its cattle sector. The country has strong laws restricting forest destruction and prohibiting forced labor and invasions of Indigenous lands. It has also developed data tools that make it possible for people throughout—and beyond—cattle supply chains to assess whether any given farm is complying with these laws.

In parallel, Brazil has developed a powerful tool for identifying which farms feed into which supply chains—a challenging task in a cattle sector as vast, complex, and fragmented as Brazil's, where animals typically pass through multiple properties from birth to slaughter. This tool is the Animal Transit Guide (Guia de Trânsito Animal, GTA). Originally created for sanitary control, GTAs record each transaction involving the movement of cattle between farms and to slaughterhouses. While they do not track individual animals, they enable a form of “batch” tracing that maps the flow of transactions through which cattle move across multiple properties before slaughter.

What Brazil has not done, however, is establish a system that brings together the country's compliance-assessment tools and the GTA transaction records in a manner—and at a scale—that could enable companies to determine whether supply chains are free of non-compliant properties. As a result, while many leading Brazilian meatpackers and tanneries have made progress in screening their direct suppliers, tens of thousands of their indirect suppliers are still going unmonitored. In practice, this means that currently—with limited exceptions—Brazilian beef and leather cannot be reliably considered free of illegal deforestation, forced labor, or Indigenous land invasions.

This traceability failure is widely acknowledged within Brazil—including by industry leaders themselves. A major barrier is that GTA records are generally inaccessible beyond the parties to the transactions they record. While some civil society advocates have urged the government to make them public, officials and experts consulted by Climate Rights International consider this unlikely to happen anytime soon, citing legal, political, and economic obstacles.



To address this gap, initiatives have emerged at the private, state, and federal levels. Companies have announced plans to create their own batch traceability systems, some relying on blockchain, to extend monitoring deeper into their supply chains. Several state governments have developed batch traceability and monitoring mechanisms that integrate GTA records with compliance-monitoring data without making the GTAs fully public. And at both the federal and state levels, governments have announced plans to establish systems for tracing individual cattle from birth until slaughter.

Some of these efforts reflect real ingenuity and commitment by multiple actors across government, civil society, and the private sector in Brazil. Pursued with care and rigor, they can deliver significant improvements in supply chain monitoring in some specific sectors and regions of production. Yet when it comes to saving the Amazon and Brazil's other forest biomes, they are—simply put—too little, too late.

The company initiatives are limited above all because they depend on voluntary participation: farmers must agree to share their GTA records, something most observers consider highly improbable. As a result, private systems will inevitably fall short of mapping entire supply chains or ensuring they are free of deforestation and abuse.

State-level batch traceability initiatives are stronger, since the governments already have access to all GTA records within their jurisdictions and can integrate them with compliance-monitoring data. Individual cattle traceability mechanisms—once established—could be even more precise and thorough in mapping the supply chains within the states that implement them.

Yet all these state-level efforts—and the company ones, to the extent they function—would likely lead to segmentation of the cattle sector, as some companies or entire states would develop cleaner supply chains, while environmental and human rights harms continue unchecked within the rest. Such segmentation of the cattle sector could lead to some localized progress but would likely do little to deter the destruction of the country's forests or to mitigate and prevent the abuses that fuel it.

Finally, the federal government's plan for individual cattle traceability could, in theory, provide the most effective long-term solution, since it would allow every animal to be tracked from birth to slaughter. But its deadlines stretch too far into the future: the national rollout is set for 2032, which, even if achieved, would come long after Brazil's forests have suffered irreversible damage. Moreover, currently, no plans have been announced to make the planned system available for anything other than containing bovine disease outbreaks.

Fortunately, Brazil already has the makings of a solution, thanks to the multiple data and tracing tools it has already created. In December 2024, the federal government launched the Agro Brasil + Sustentável (AB+S) program, with an online platform that consolidates all socio-environmental compliance data for rural properties throughout the country. And, unlike state governments, the federal government has access to all GTA records generated throughout the country. By combining the compliance-assessment function of the AB+S platform with the traceability function of the GTA system, the federal government could establish a national batch traceability and monitoring mechanism that—according to multiple Brazilian officials and cattle industry experts—could be operational within months.

The idea of a such a mechanism at the national level enjoys broad support among government officials and civil society advocates engaged on these issues. It also enjoys support within some sectors of the Brazilian cattle industry. However, the idea has, until now, been largely thwarted by resistance from other sectors—particularly among cattle producers.

This resistance is misguided. Among the principal beneficiaries of such a system would be the vast majority of Brazilian cattle ranchers who comply with the country's laws protecting forests, workers, and Indigenous people. In the absence of effective traceability and monitoring, these ranchers face unfair competition from others who engage in environmental crime and human rights abuses, which lower their costs of production, while increasing the regulatory and market risks for the entire sector by contaminating the supply chains in which they all participate. In the longer term, the destruction of the country's forests by non-compliant producers is hastening ecological impacts that could have catastrophic consequences for law-abiding ranchers throughout the country—as well as the broader population of Brazil, the region, and the world.

## Fashion and Footwear Brands Must Do Their Part

Leather production holds particular relevance for addressing the environmental and human rights challenges facing Brazil's cattle sector. While far smaller in scale than beef, leather sales still generate billions in revenue and are important to some meatpackers' profitability. Roughly 80 percent of Brazilian hides are exported, with much of it reaching international fashion and footwear brands that are often more attentive to sustainability issues than beef retailers and that have far greater public visibility than other companies linked to cattle supply chains. Given this visibility, fashion and footwear companies are in a unique position to shape global perceptions of Brazil's cattle sector, build awareness of the need for more sustainable supply chains, and mobilize support for efforts within Brazil to achieve them.

It is important that these companies recognize that, in the absence of sector-wide traceability, the capacity of Brazilian tanneries and slaughterhouses to eliminate non-compliant farms from their supply chains—and the capacity of companies to fully trace their own leather supply chains—will remain limited. Moreover, even if some companies do actually manage to clean up their own supply chains, without sector-wide improvements this achievement will likely encourage the segmentation of the cattle market while doing little to save the country's forests or prevent the human rights abuses fueling their destruction.

To help Brazil make real progress in rooting out these problems, global fashion and footwear companies should use their influence—individually and collectively—to support the creation of a national traceability and monitoring mechanism. When it comes to cattle-driven deforestation and related abuses—particularly in the Amazon—all supply chains must be sustainable, or ultimately, none will be.

## Key Recommendations

### To Brazil's federal government:

#### *National traceability and monitoring cattle sector*

- Establish a **national compliance monitoring platform** by expanding the newly created Agro Brasil + Sustentavel platform and using it to provide public access to official environmental and human rights compliance data on cattle-sector suppliers.
- Develop **national traceability systems**, launching a batch system based on harmonized GTA records in the near term, while accelerating implementation of the recently announced individual traceability system, which is currently scheduled to be operational in 2032.
- Integrate the national monitoring platform with the traceability systems to create a unified **national traceability and monitoring mechanism** capable of assessing environmental and human rights risks within supply chains throughout the cattle sector. The mechanisms should be operated by an independent entity, with an oversight committee that includes industry, civil society, and academic representatives, in coordination with the Federal Prosecutors Office and relevant government ministries.

### To the Brazilian Congress:

#### *Mandatory Human Rights Due Diligence Legislation*

- Pass Legislative Proposal (PL 572/2022) to establish a National Framework on Human Rights and Business making human rights due diligence mandatory across all sectors, including agriculture and livestock, requiring companies to identify, prevent, monitor, and remedy abuses throughout their value chains.

### To Meatpackers and Tanneries in Brazil:

- Advocate for and support the prompt development of 1) a national compliance monitoring platform, 2) a national batch traceability system and a national individual traceability system, and 3) an integrated national traceability and monitoring mechanism for cattle supply chains.
- Take steps to strengthen company monitoring of suppliers' compliance with sourcing requirements related to forest conservation and human rights—using all available monitoring tools. Tanneries should conduct rigorous reviews of risk assessments by slaughterhouses to verify that they are identifying high-risk



suppliers accurately and applying heightened scrutiny and stricter sourcing requirements where appropriate—and stop sourcing from any that are not doing enough or taking credible steps to improve.

**To Global Fashion and Footwear Companies:**

- Advocate for and support the prompt development of 1) a national compliance monitoring platform, 2) a national batch traceability system and a national individual traceability system, and 3) an integrated national traceability and monitoring mechanism for cattle supply chains.
- Conduct a thorough mapping of global supply chains to identify possible links to Brazilian tanneries and, if such links exist, trace supply chains back to Brazilian slaughterhouses and, to the maximum extent possible, cattle producers.
- Take steps to strengthen company monitoring of suppliers' compliance with sourcing requirements related to forest conservation and human rights.
- Conduct rigorous review of risk assessments by slaughterhouses that supply tanneries linked to company's supply chains to verify that they are identifying high-risk suppliers accurately and applying heightened scrutiny and stricter sourcing requirements where appropriate—and block tanneries sourcing from slaughterhouses that are not doing enough or taking credible steps to improve.



*A map of Brazil and the location of the cattle farms in the illustrative cases in Chapter V. Map created by Sarah Sax/Climate Rights International using Mapbox Studio.*



Major meatpackers are failing to monitor tens of thousands of indirect suppliers for deforestation, forced labor, and invasions of Indigenous lands.



Illegal deforestation



Forced labour



Indigenous land invasions

Indirect supplier

Indigenous territories

Indirect supplier

Indirect supplier

Indirect supplier

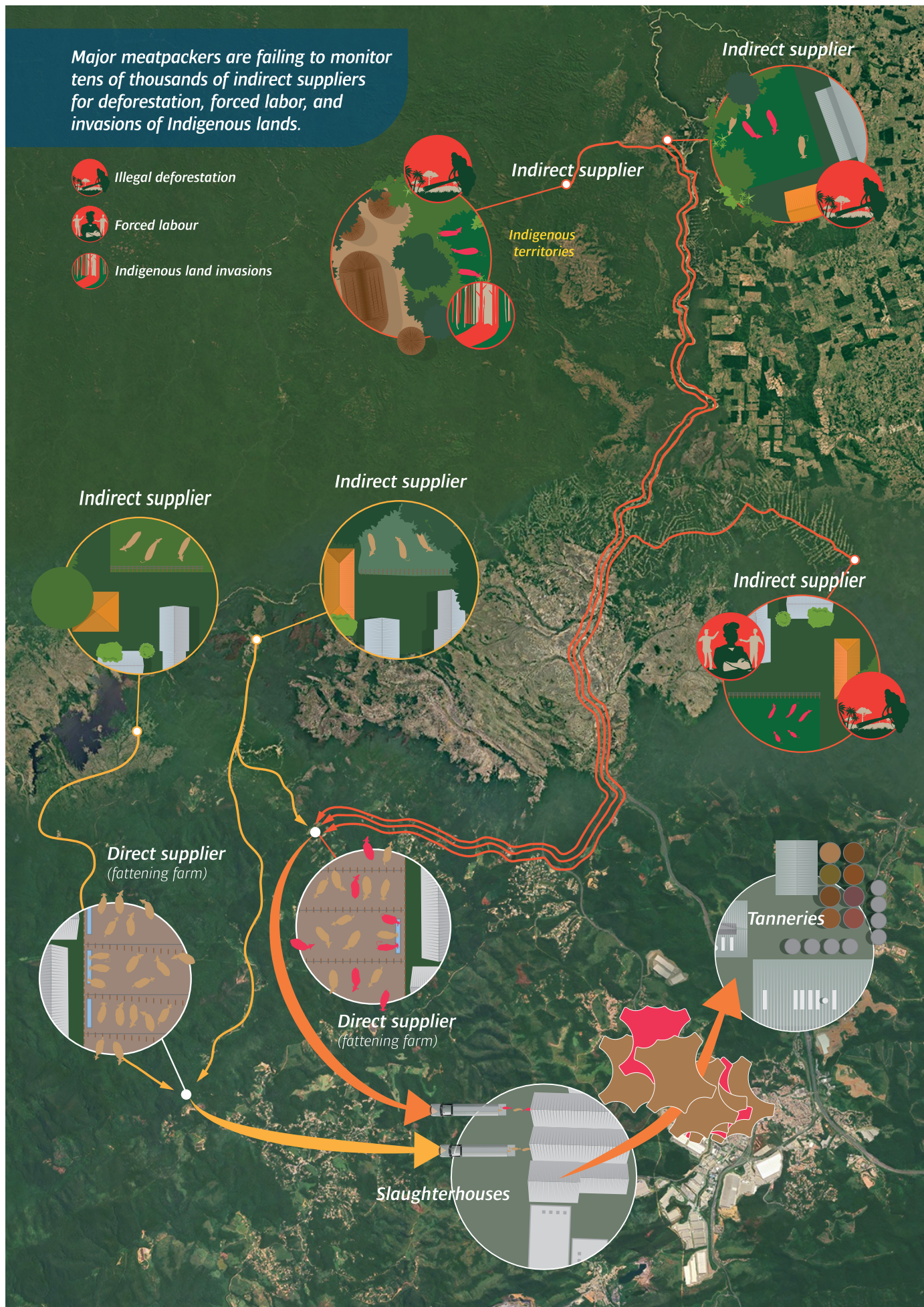
Indirect supplier

Direct supplier  
(fattening farm)

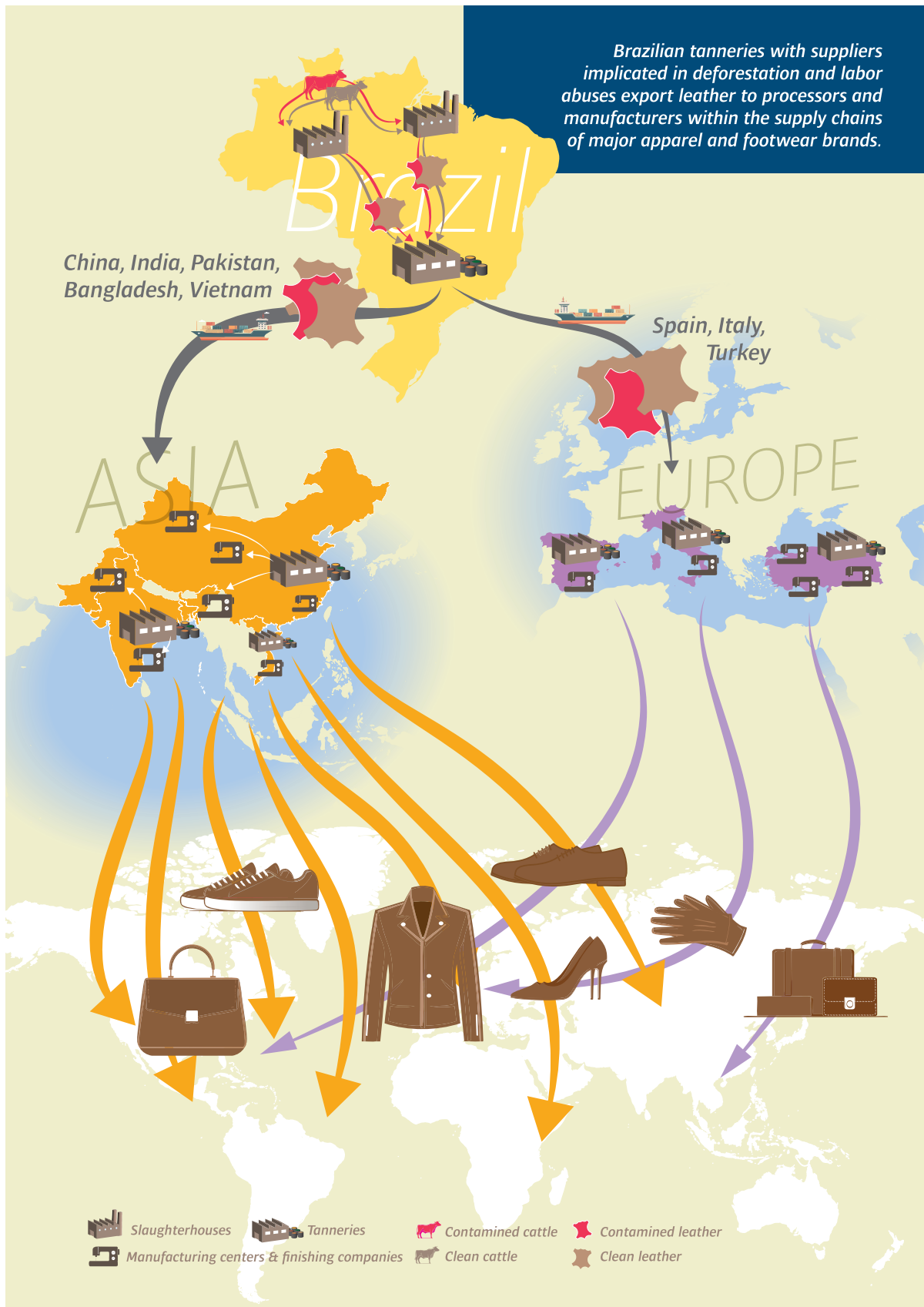
Direct supplier  
(fattening farm)

Tanneries

Slaughterhouses







## Methodology

This report is based on more than 50 interviews, conducted mostly between May and July 2025, with Brazilian federal and state government officials, cattle industry representatives, academics, and civil society experts. In addition, it draws upon field research carried out in May 2025 in southeastern Pará, where we interviewed eight current or former employees of cattle ranches, and southwestern Maranhão, where we interviewed seven residents of the Krikati Indigenous Territory.

Many of the people interviewed requested anonymity due to concerns about risks if they were identified. In some cases—including most of the rural workers and several Krikati community members—these concerns included fears for their physical safety. Throughout the report, identifying details are withheld for some interviewees, including withholding names and specific dates and locations of interviews.

Climate Rights International collaborated with Repórter Brasil to document ten cases involving cattle producers linked to labor abuses, Indigenous land invasions, and/or deforestation who have been direct or indirect suppliers of major meatpackers. Unless otherwise indicated, the description of the abusive labor practices on the farms is based on official reports by federal labor inspectors obtained by Climate Rights International and Repórter Brasil.<sup>1</sup> Also, unless otherwise indicated, the information regarding cattle transactions is based on Animal Transit Guides (Guias de Trânsito Animal, GTAs) and other types of cattle transit data obtained by Repórter Brasil and presented in its report.<sup>2</sup>

Climate Rights International also collaborated with Stand.earth Research Group to identify international fashion and footwear brands whose supply chains are linked to one or more of six Brazilian tanneries that source hides from the slaughterhouses linked to the ten cases documented in this report. For each tannery company, Stand.earth Research Group used Brazilian export customs data to determine first-tier customers (i.e. leather processors) around the world. It then conducted extensive research to identify supply links between each of these leather processors and other

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<sup>1</sup> Inspection reports are available at [https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/copy\\_of\\_combate-ao-trabalho-escravo-e-analogo-ao-de-escravo](https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/copy_of_combate-ao-trabalho-escravo-e-analogo-ao-de-escravo).

<sup>2</sup> Repórter Brasil, *Under the Radar: How Cattle Ranchers Caught Employing Slave Labour Are Part of the Supply Chains of Brazil's Largest Meatpacking Companies* (October 9, 2025), <https://reporterbrasil.org.br>.

processors, product manufacturers, and consumer-facing companies and brands. These links were uncovered by analyzing data from a variety of sources, including:

- Brazilian export customs data (from 2023);
- Other global import/export customs data (e.g. India, Indonesia, Mexico, Philippines, Vietnam);
- US imports vessel manifest data;
- Company/brand voluntary supplier disclosure documents;
- Company annual reports, investor presentations, and websites.

Each of these individual links was added to a single database. Filters were applied to ensure that brands were only included if they have at least two direct suppliers that are linked to tanneries operated by one or more of the six companies within the past two years.

Climate Rights International also conducted an extensive review of more than 40 publications by journalists and nongovernmental organizations on the Brazilian cattle sector (see appendix). We identified within these publications more than 340 reported cases in which meatpackers' supply chains were linked to producers implicated in illegal deforestation and/or human rights harms.

Climate Rights International wrote to all of the meatpackers, tanneries and fashion brands named in this report in advance of publication. Copies of those letters and the company responses can be found in Appendix B. Repórter Brasil wrote to the individual ranchers and the meatpackers in advance of their report. That correspondence can be found in the Repórter Brasil report.<sup>3</sup>

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<sup>3</sup> Ibid.



## I. Deforestation

Brazil has in the past demonstrated great potential to be a global leader in forest conservation, achieving one of the most dramatic environmental turnarounds in modern history. In the early 2000s, faced with soaring deforestation rates, the country adopted ambitious policies that delivered an 80 percent reduction in Amazon forest loss between 2004 and 2012—from nearly 28,000 square kilometers cleared annually to fewer than 4,600.<sup>4</sup> Yet these gains began to unravel after 2012, with deforestation in the Amazon climbing to 7,500 square kilometers in 2018 and then surging by more than 60 percent under President Jair Bolsonaro to over 11,600 square kilometers in 2022.<sup>5</sup>

Today the future of Brazil's forests hangs in the balance—and the stakes could not be higher. Brazil is home to roughly 60 percent of the Amazon, the planet's largest terrestrial carbon reserve. Scientists warn that ongoing deforestation is pushing the Amazon toward a critical "tipping point" at which massive tree loss would disrupt the forest's hydrological cycle, causing parts of it to dry out and triggering the release of billions of tons of stored carbon into the atmosphere.<sup>6</sup> Recent data indicates this process may already be underway, as portions of the rainforest are now releasing more carbon than they absorb.<sup>7</sup> Moreover, the country's other forested biomes are also at risk—most notably the Cerrado, a vast savanna with significant carbon stores, where deforestation rates also remain dangerously high.<sup>8</sup>

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<sup>4</sup> Official deforestation data comes from Brazil's National Space Research Agency (INPE), which produces annual estimates of how many square kilometers the "Legal Amazon" area loses to clear-cut deforestation through the Program to Calculate Amazon Deforestation (PRODES). The yearly data reported by PRODES covers the 12-month period from August 1 of the previous year through July 31. Camara, Gilberto, et al. "Metodologia para o cálculo da taxa anual de desmatamento na Amazônia Legal." *São José dos Campos: INPE*, 2011. [https://www.academia.edu/510136/Metodologia\\_para\\_o\\_c%C3%A1lculo\\_da\\_taxa\\_anual\\_de\\_desmatamento\\_na\\_Amaz%C3%B4nia\\_Legal](https://www.academia.edu/510136/Metodologia_para_o_c%C3%A1lculo_da_taxa_anual_de_desmatamento_na_Amaz%C3%B4nia_Legal).

<sup>5</sup> Angelo, Claudio, "Bolsonaro Ends Government with 60% Increase in Amazon Deforestation." *Observatório do Clima*, November 30, 2022. <https://oc.eco.br/en/bolsonaro-ends-government-with-60-increase-in-amazon-deforestation/>.

<sup>6</sup> Harvey, Chelsea, "Amazon Rain Forest Nears Dangerous 'Tipping Point,'" *Scientific American*, March 8, 2022. <https://www.scientificamerican.com/article/amazon-rain-forest-nears-dangerous-tipping-point/>; Flores, Bernardo M., et al. "Critical Transitions in the Amazon Forest System." *Nature* 626, no. 7999, 2024: 555-564. <https://www.nature.com/articles/s41586-023-06970-0>.

<sup>7</sup> Gatti, Luciana V., et al. "Amazonia as a Carbon Source Linked to Deforestation and Climate Change." *Nature* 595, 2021: 388-393. <https://doi.org/10.1038/s41586-021-03629-6>.

<sup>8</sup> Federal Government of Brazil, "Federal Government Announces Amazon, Cerrado Deforestation Drop; Concludes Prevention Pact," *Planalto Brazilian Federal Government*, November 8, 2024.



Clearing forest for pasture is the leading cause of deforestation in the Amazon. Credit: Fernando Martinho for CRI.

Brazil's conservation efforts gained renewed momentum in 2023, when President Luiz Inácio Lula da Silva made deforestation reduction a national priority and appointed veteran environmentalists to lead key agencies.<sup>9</sup> Within two years, their efforts helped reduce Amazon deforestation by nearly half.<sup>10</sup> Yet even this progress has proven insufficient to address the scale of the mounting crisis. More than 14,000 square kilometers of Brazilian forest and native vegetation—an area the size of Connecticut—were cleared in 2024 alone, with destruction continuing at alarming rates in both the Amazon and the Cerrado.<sup>11</sup>

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<https://www.gov.br/planalto/en/latest-news/2024/11/federal-government-announces-amazon-cerrado-deforestation-drop-concludes-prevention-pact>.

<sup>9</sup> Phillips, Tom, "Brazil's President Lula Picks Staunch Amazon Defenders for Ministry." *The Guardian*, December 29, 2022. <https://www.theguardian.com/world/2022/dec/29/brazils-president-lula-picks-staunch-amazon-defenders-for-ministry>.

<sup>10</sup> Butler, Rhett Ayers, "Amazon Deforestation in Brazil Plunges 31% to Lowest Level in 9 Years." *Mongabay*, November 10, 2024. <https://news.mongabay.com/2024/11/amazon-deforestation-in-brazil-plunges-31-to-lowest-level-in-9-years/>.

<sup>11</sup> Instituto Nacional de Pesquisas Espaciais (INPE). "TerraBrasilis: Cerrado Biome—Increments Dashboard." *TerraBrasilis*. Accessed September 12, 2025. <https://terrabrasilis.dpi.inpe.br/app/dashboard/deforestation/biomes/cerrado/increments>; MapBiomas Alerta.

“We inherited a train speeding toward a cliff,” the president of Brazil’s federal environmental enforcement agency (IBAMA) told Climate Rights International in May 2025. “We’ve slowed the train, but we’re still headed toward disaster.”<sup>12</sup>

In interviews with senior government officials and environmentalists, Climate Rights International found widespread concern about Brazil’s ability to avert this disaster.<sup>13</sup> Government agencies responsible for enforcing environmental laws were severely weakened under the Bolsonaro administration, with budgets slashed and experienced personnel driven out.<sup>14</sup> While progress has been made in restoring their staffing and resources, these weakened institutions are struggling to compete with the economic forces driving deforestation, most notably agricultural production—and, especially, the expansion of cattle ranching onto recently cleared lands.

Cattle ranching is the largest driver of deforestation and conversion of native vegetation in Brazil, linked to an estimated 93 percent of forest loss in the Amazon and about 70 percent of deforestation in the Cerrado.<sup>15</sup> Between 2008 and 2021, this cattle expansion cleared roughly 120,000 square kilometers of forest in the Amazon alone, along with extensive areas of savanna and forested habitat in the Cerrado.<sup>16</sup>

The scale of this deforestation reflects Brazil’s position as the world’s largest beef exporter.<sup>17</sup> Brazil shipped 2.29 million tons in 2023, nearly 20 percent of all beef

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“RAD2024 Report – Annual Report on Deforestation in Brazil” *MapBiomias Alerta*, May 15, 2025. [https://alerta.mapbiomas.org/wp-content/uploads/sites/17/2025/05/RAD2024\\_15.05.pdf](https://alerta.mapbiomas.org/wp-content/uploads/sites/17/2025/05/RAD2024_15.05.pdf).

<sup>12</sup> Climate Rights International interview with Rodrigo Agostinho, president of IBAMA, May 9, 2025.

<sup>13</sup> Climate Rights International interviews with senior government officials and civil society experts, March–July 2025.

<sup>14</sup> Human Rights Watch, “Crisis in the Brazilian Amazon.” *Human Rights Watch*, April 19, 2022. <https://www.hrw.org/news/2022/04/19/crisis-brazilian-amazon>.

<sup>15</sup> The Nature Conservancy, “Environmental Framework for Lending and Investing in Sustainable Intensification of Cattle Ranching in the Amazon and Cerrado.” The Nature Conservancy, March 2021. <https://www.nature.org/content/dam/tnc/nature/en/documents/brasil/tnc-execs-environmentalframeworkcattle.pdf>.

<sup>16</sup> Stockholm Environment Institute, “Trase: Brazilian Beef Exports and Deforestation.” *Stockholm Environment Institute*, November 21, 2023. <https://www.sei.org/features/trase-brazil-beef-exports-deforestation/>.

<sup>17</sup> Citing 18.7% of global beef exports in 2022. Brazilian Beef Exporters’ Association (ABIEC). “Beef Report 2024. English ed.,” *ABIEC*, April 2024. [https://www.abiec.com.br/wp-content/uploads/beefreport\\_v2024-ENG.pdf](https://www.abiec.com.br/wp-content/uploads/beefreport_v2024-ENG.pdf); Aquino, Camila. “Livestock and Products Semi-Annual, Brazil, Report No. BR2025-0004.” *USDA Foreign Agricultural Service*, February 28, 2025.



traded globally.<sup>18</sup> This represents a 50 percent increase in export volume over the past decade, with revenue rising from US \$6.7 billion in 2013 to US \$10.6 billion in 2023.<sup>19</sup> While much of Brazil's beef is consumed domestically, the rapid growth of exports has been a major driver of cattle production expansion. More than half of Brazil's beef exports originate in states classified as high-risk for illegal forest clearing.<sup>20</sup> Leather exports have also played a role in incentivizing deforestation: nearly 80 percent of bovine hides are exported, and their sale contributes to slaughterhouse profitability (see Chapter VI).<sup>21</sup>



Freshly deforested land in the Krikati territory. Credit: Fernando Martinho for CRI.

Under Brazil's Forest Code, landowners must preserve a portion of native forests on their properties—80 percent in the Amazon, 35 percent in transitional zones like the

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[https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Livestock+and+Products+Semi-annual\\_Brasilia\\_Brazil\\_BR2025-0004](https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Livestock+and+Products+Semi-annual_Brasilia_Brazil_BR2025-0004).

<sup>18</sup> Brazilian Beef Exporters' Association (ABIEC). "Beef Report 2024. English ed.," *ABIEC*, April 2024.

[https://www.abiec.com.br/wp-content/uploads/beefreport\\_v2024-ENG.pdf](https://www.abiec.com.br/wp-content/uploads/beefreport_v2024-ENG.pdf).

<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

<sup>21</sup> Natural Intelligence (NINT). "The Impact of a Shift in Global Demand for Leather on Brazilian Slaughterhouses" *Rainforest Foundation Norway*. February 2023. <https://dv719tqmsuwvb.cloudfront.net/documents/Economic-study-of-shift-in-global-leather-demand-on-Brazilian-slaughterhouses-report-by-NINT-for-Rainforest-Foundation-Norway.pdf>.

Cerrado, and 20 percent in other regions.<sup>22</sup> These preserved areas cannot be legally cleared for cattle ranching, crops, or infrastructure.

To promote compliance, landowners must register their properties in a national system known as the Rural Environmental Registry (*Cadastro Ambiental Rural*–CAR), which maps forest cover and land use.<sup>23</sup> The CAR is a mandatory system where landowners self-report their land use, allowing agencies to cross-check these claims with satellite imagery.<sup>24</sup>

Clearing vegetation beyond legal limits without authorization is punishable by fines and possible criminal prosecution.<sup>25</sup> In practice, however, enforcement is severely lacking, in large measure due to staffing shortages within enforcement agencies and an enormous backlog in the collection of unpaid fines.<sup>26</sup> Given this enforcement gap, reducing the economic incentives that reward noncompliance is critical to curbing forest loss and shifting land use practices.

## *Disincentivizing Deforestation*

One of Brazil's primary tools for reducing the economic incentives driving illegal deforestation is the imposition of environmental embargoes. When environmental agencies like IBAMA detect illegal forest clearing through satellite monitoring or field inspections, they can impose embargoes that prohibit all economic activities on the affected area—including cattle grazing.<sup>27</sup> Properties under embargo are also blocked

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<sup>22</sup> Brazil. Law No. 12,651 of May 25, 2012 (SENASP). Translated version." *Ministry of Justice and Public Security*. Accessed September 12, 2025. [https://www.gov.br/mj/pt-br/acao-a-informacao/atuacao-internacional/legislacao-traduzida/lei-no-12-651-de-25-de-maio-de-2012-senasp\\_eng-docx.pdf](https://www.gov.br/mj/pt-br/acao-a-informacao/atuacao-internacional/legislacao-traduzida/lei-no-12-651-de-25-de-maio-de-2012-senasp_eng-docx.pdf).

<sup>23</sup> Ibid.

<sup>24</sup> Chiavari, Joana, et al. "Brazil's New Forest Code, Part I: How to Navigate the Complexity. Climate Policy Initiative & Input Brazil," November 2015. <https://www.climatepolicyinitiative.org/wp-content/uploads/2015/11/Policy-Brief-Part-I-How-to-Navigate-the-Complexity-1.pdf>.

<sup>25</sup> Brazil. "Law No. 9,605 of February 12, 1998 – Environmental Crimes Law (*Lei de Crimes Ambientais*).” Art. 38 & 50A, *Government of Brazil*, 1998. Accessed September 12, 2025. [www.planalto.gov.br/ccivil\\_03/Leis/L9605.htm](http://www.planalto.gov.br/ccivil_03/Leis/L9605.htm).

<sup>26</sup> "[D]ue to delays in fines, lack of technicians to handle fines and numerous administrative problems, only between 0.2 and 5% of fines are paid." Ibid; *See also*: Human Rights Watch. "Crisis in the Brazilian Amazon." *Human Rights Watch*, April 19, 2022. <https://www.hrw.org/news/2022/04/19/crisis-brazilian-amazon>.

<sup>27</sup> Bezerra, Luiz Gustavo, et al. "Brazilian Federal Environmental Agency Publishes Ruling on Deforestation Embargo." *Mayer Brown Insights*, June 13, 2023. <https://www.mayerbrown.com/en/insights/publications/2023/06/brazilian-federal-environmental-agency-publishes-ruling-on-deforestation-embargo>; *see also* Earthsight. "Brazilian Criminal Deforestation Networks Still

from accessing rural credit from the government and many private banks.<sup>28</sup> To lift an embargo, landowners must typically reforest cleared areas, pay fines, and demonstrate compliance with environmental regulations.<sup>29</sup>

The impact of the embargoes has been inconsistent, however, with many properties continuing to operate despite restrictions.<sup>30</sup> Given the limitations of these government measures, meatpackers can play a critical role in curbing the economic incentive fueling cattle-driven deforestation. If enough of them stopped buying cattle raised on illegally deforested lands, they could make it more difficult for these ranchers to profit off their environmental crimes. Indeed, as discussed in Chapter IV, most major slaughterhouses have committed to doing just that under the legally binding “Beef TAC” agreement they have signed with the Federal Prosecutor’s Office. Yet while they have made significant progress in fulfilling this commitment when it comes to their direct suppliers, their efforts to screen out indirect suppliers linked to illegal deforestation have been far less effective.

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Active Despite Arrests, Embargo.” *EarthSight*, March 20, 2017.

<https://www.earthSight.org.uk/news/idm/brazilian-criminal-deforestation-networks-still-active-despite-arrests-embargo>.

<sup>28</sup> Central Bank of Brazil, “Resolução CMN no. 5.193: Alterações às normas da Seção 9 (Impedimentos Sociais, Ambientais e Climáticos) do Manual de Crédito Rural.” *Banco Central do Brasil*, December 19, 2024. <https://www.bcb.gov.br/estabilidadefinanceira/exibenormativo?tipo=Resolu%C3%A7%C3%A3o%20CMN&numero=5193>; Souza, Priscila, et al. “Credit Where It’s Due: Unearthing the Relationship between Rural Credit Subsidies and Deforestation.” *Climate Policy Initiative*, July 8, 2024.

<https://www.climatepolicyinitiative.org/publication/credit-where-its-due-unearthing-the-relationship-between-rural-credit-subsidies-and-deforestation/>.

<sup>29</sup> JusBrasil, “Forest Code | Law No. 12,651, of May 25, 2012” *JusBrasil*. Accessed September 12, 2025. <https://www.jusbrasil.com.br/legislacao/1032082/lei-12651-12>; see also Mendes, Karla. “We’re Getting Back on Track: Interview with IBAMA Head Rodrigo Agostinho,” *Mongabay*, January 24, 2025.

<https://news.mongabay.com/2025/01/were-getting-back-on-track-interview-with-ibama-head-rodriago-agostinho/>.

<sup>30</sup> Nunes, Felipe S. M., et al. “Rural Environmental Registry (CAR) Data Indicates Substantial Deforestation in Brazilian Properties with Approved PRA.” *Scientific Reports* 14, 2024. <https://www.nature.com/articles/s41598-024-52180-7>.



## II. Forced Labor and Labor Exploitation

In the Brazilian Amazon, ranchers clearing the rainforest frequently rely on forced labor or other severe forms of labor exploitation to ensure their environmental crimes turn a profit. Workers lured to remote forest areas with the promise of decent jobs find themselves instead toiling long days under harsh and sometimes dangerous conditions, housed in plastic shacks, drinking contaminated water, lacking access to adequate sanitary facilities, undertaking dangerous work without protective equipment, and enduring insufficient food supply.

Overworked and underpaid, they are deterred from leaving by economic coercion, threats of violence, and the daunting distances they would have to travel by foot to reach the outside world. The labor abuses suffered by many of those clearing the rainforest for cattle ranches are in violation of Brazilian law prohibiting “conditions analogous to slavery” and, in many cases, international prohibitions on forced labor.



A worker closes a gate in a cattle ranch in São Félix do Xingu, Pará. Credit: Fernando Martinho for CRI.

## Brazilian Law: Prohibition of “Conditions Analogous to Slavery”

Brazilian law criminalizes various forms of labor exploitation, including “reducing someone to a condition analogous to slavery.” Originally established in the 1940 Penal Code, this provision was amended in 2003 to define what constitutes conditions analogous to slavery, including forced labor, debt bondage, exhaustive working hours, and degrading conditions.<sup>31</sup>

Under the law, a worker is deemed to be in a “condition analogous to slavery” when subjected to any of the following:

- **Forced labor:** work required, under threat of physical or psychological punishment, to which the worker did not freely consent or would not choose to remain voluntarily.
- **Exhausting work hours:** mental or physical labor which, due to its duration or intensity, infringes on fundamental worker rights—especially in relation to safety, health, rest, and social or family life.
- **Degrading working conditions:** any form of denial of human dignity through violation of the worker’s fundamental rights, particularly those outlined in labor protection and workplace safety, hygiene, and health norms.
- **Restriction of movement:** when a worker’s freedom to leave the workplace is limited because of debt imposed by the employer or representative, restriction on use of any means of transport, overt surveillance, or the withholding of the worker’s personal belongings or identification documents.<sup>32</sup>

## International Law: Prohibition of Slavery and Forced Labor

International law expressly prohibits slavery, forced labor, and “practices similar to slavery,” such as debt bondage.<sup>33</sup> The American Convention on Human Rights, to

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<sup>31</sup> Art. 149. “Reducing someone to a condition analogous to slavery, whether by subjecting them to forced labor or exhaustive working hours, or by subjecting them to degrading working conditions, or by restricting, by any means, their movement due to a debt contracted with the employer or agent.” Brazil. “Penal code, Decree-Law No. 2.848, of December 7, 1940, art. 149,” *Brazilian Presidential Office*, Accessed June 27, 2025. [http://www.planalto.gov.br/ccivil\\_03/decreto-lei/del2848compilado.htm](http://www.planalto.gov.br/ccivil_03/decreto-lei/del2848compilado.htm).

<sup>32</sup> Brazil, Ministry of Labor and Employment, “Normative Instruction No. 2 of November 8, 2021: Procedures to Be Observed by the Labor Inspectorate.” *Ministry of Labor and Employment*, 2021. Accessed September 12, 2025. <https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/in-2-de-8-denovembro-de-2021.pdf>.

<sup>33</sup> Office of the United Nations High Commissioner for Human Rights, “Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery.” *United Nations*. Adopted September 7, 1956; entered into force April 30, 1957. Accessed July 11, 2025.

which Brazil is a party, also forbids slavery, servitude, and forced or compulsory labor.<sup>34</sup> While slavery has traditionally been defined to require ownership of the person enslaved,<sup>35</sup> some courts, including the Inter-American Court of Human Rights, have recognized that the focus should be on the control exercised over a person that significantly restricts or deprives them of their individual freedom, with the intent to exploit them, rather than on literal ownership.<sup>36</sup>

Forced labor is expressly prohibited by ILO Convention No. 29, which has been ratified by 181 countries, including Brazil. The Convention defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”<sup>37</sup> According to the ILO, the systematic and deliberate withholding of wages, used by abusive employers to compel workers to stay in a job out of fear of losing accrued earnings, is the most common form of coercion, but other forms can include abuse of vulnerability through threat of dismissal, forced confinement, physical and sexual violence, and the deprivation of basic needs.<sup>38</sup>

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<https://www.ohchr.org/en/instruments-mechanisms/instruments/supplementary-convention-abolition-slavery-slave-trade-and>.

<sup>34</sup> Organization of American States, “American Convention on Human Rights: Pact of San José, Costa Rica.” *Department of International Law*, Adopted November 22, 1969; entered into force July 18, 1978. Article 6. [https://www.oas.org/dil/treaties\\_B-32\\_American\\_Convention\\_on\\_Human\\_Rights.htm](https://www.oas.org/dil/treaties_B-32_American_Convention_on_Human_Rights.htm). (Under Brazilian law, international human rights treaties such as the American Convention have “surpralegal” status, putting them below the Constitution but above domestic laws in the legal hierarchy. See Conectas Direitos Humanos. “Supra-Legality of International Human Rights Treaties and Constitutional Interpretation.” SUR – International Journal on Human Rights. Accessed September 27, 2025. <https://sur.conectas.org/en/supra-legality-international-human-rights-treaties-constitutional-interpretation/>.)

<sup>35</sup> “Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.” “Slavery Convention (1926).” *United Nations*. Adopted September 25, 1926; entered into force March 9, 1927. Accessed September 12, 2025. <https://www.ohchr.org/en/instruments-mechanisms/instruments/slavery-convention>.

<sup>36</sup> Finding that workers at a remote and isolated ranch who were forced to hand over their work certificates and were subjected to excessive working hours, threats and violence, deplorable living conditions and constant vigilance by armed guards met the conditions of slavery). International Court of Human Rights. “Case of the Hacienda Brasil Verde Workers v. Brazil.” *Inter-American Court of Human Rights Series C No. 318*, October 20, 2016. [https://www.corteidh.or.cr/docs/casos/articulos/seriec\\_318\\_ing.pdf](https://www.corteidh.or.cr/docs/casos/articulos/seriec_318_ing.pdf).

<sup>37</sup> “C029 — Forced Labour Convention, 1930 (No. 29).” *International Labour Organization*. Accessed June 27, 2025. [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029); See also International Labour Organization, “Hard to See, Harder to Count: Handbook on Forced Labour Surveys.” Geneva: ILO, 2024. [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed\\_norm/@ipec/documents/publication/wcms\\_914768.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@ipec/documents/publication/wcms_914768.pdf).

<sup>38</sup> International Labour Organization, “Global Estimates of Modern Slavery: Forced Labour and Forced Marriage,” Geneva: ILO, September 12, 2022. [https://www.ilo.org/global/topics/forced-labour/publications/WCMS\\_854733/lang-en/index.htm](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang-en/index.htm).

Because forced labor can be difficult to detect, in large part due to the vulnerability and invisibility of many victims, the ILO has developed 11 operational indicators to help identify persons who may be trapped in a forced labour situation and may require urgent assistance.<sup>39</sup> These indicators include abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime.<sup>40</sup> An example of abusive conditions that the ILO highlights is one drawn from a Brazilian cattle ranch, at which workers were housed in plastic shacks, drinking contaminated water, and being kept hidden in holes behind bushes to avoid being seen.<sup>41</sup>

The ILO explicitly states that, while extremely poor working and living conditions alone do not prove the existence of forced labor—since people may "voluntarily" accept such conditions due to lack of employment alternatives—they should be considered a "warning sign" of the possible presence of coercion that is preventing workers from leaving their jobs.<sup>42</sup>

## *Labor Abuses and Cattle-Driven Deforestation*

Forced labor and other severe forms of labor exploitation have been chronic and widespread in the Brazilian cattle sector.<sup>43</sup> Since 1995, federal authorities have rescued more than 17,000 workers from forced labor or other conditions analogous to slavery in cattle ranches—accounting for around one-third of all workers rescued during this period in Brazil.<sup>44</sup> This number likely represents only the “tip of the

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<sup>39</sup> International Labour Organization, “ILO Indicators of Forced Labour,” *ILO*, Oct.1, 2012. <https://www.ilo.org/publications/ilo-indicators-forced-labour>.

<sup>40</sup> *Ibid.*

<sup>41</sup> *Ibid.*

<sup>42</sup> *Ibid.*

<sup>43</sup> This has been a consistent finding, with multiple reports linking contemporary forms of slavery to environmental degradation in the Amazon. Shannon Hobbs, “From Chains to Chainsaws: Modern Slavery and Deforestation in the Brazilian Amazon,” *Sage Publications*, April 2024. <https://doi.org/10.1177/25148486231187397>.

<sup>44</sup> Repórter Brasil. “Slave Labor in Brazil’s Meat Industry.” *Repórter Brasil*, Jan. 2021. <https://reporterbrasil.org.br/wp-content/uploads/2021/01/Monitor-8-Slave-labor-in-Brazils-meat-industry.pdf>.



iceberg,” according to federal officials and rights advocates, who believe that the vast majority of cases likely go undetected.<sup>45</sup>

There is a strong correlation between the use of forced labor and labor exploitation in the cattle sector and the destruction of Brazil’s forests. Documented cases concentrate heavily in the country’s “arc of deforestation,” which spans the southern and eastern edges of the Amazon rainforest where deforestation is most intense and persistent.<sup>46</sup> A comprehensive review of nearly 1,000 cases of labor abuses in the cattle sector between 2004 and 2016 revealed a clear pattern: properties subjecting workers to forced labor or other conditions analogous to slavery tended to be located in more remote, forested areas and exhibit significantly higher rates of deforestation than other ranches.<sup>47</sup>

Federal officials in Pará interviewed by Climate Rights International confirmed this conclusion: “When illegal deforestation is found, we generally also find workers in conditions analogous to slavery,” one explained.<sup>48</sup>

This correlation between deforestation and the egregious mistreatment of workers reflects the underlying economic dynamic of cattle expansion in the Amazon. Clearing rainforest requires significant capital, while establishing ranches requires intensive labor.<sup>49</sup> Ranchers must buy or rent heavy machinery to open new roads and remove the largest and most valuable trees or hire professional crews with the equipment and skills needed to use it.<sup>50</sup> At the same time, they must obtain workers

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<sup>45</sup> Climate Rights International interview with Driana Carvalho, Rural Workers Union of São Félix do Xingu, Pará, May 19, 2025; Climate Rights International interview with José Batista Afonso, lawyer for the Comissão Pastoral da Terra in Marabá, May 15, 2025.

<sup>46</sup> Shannon Hobbs, “From Chains to Chainsaws: Modern Slavery and Deforestation in the Brazilian Amazon,” *Environment and Planning E: Nature and Space* 7, no. 2, July 17, 2023. <https://doi.org/10.1177/25148486231187397>.

<sup>47</sup> Juliana Brandão et al., “Behind the Cattle Industry: Modern Slave Labor Used to Produce Brazil’s Beef and Leather,” *SSRN*, Oct. 3, 2023. <https://ssrn.com/abstract=4590747>.

<sup>48</sup> Labor Prosecutors Office, Climate Rights International interview with Silvia Silva da Silva, Labor Prosecutors Office (MPT), Belém, May 13, 2025.

<sup>49</sup> Estimates suggest that to deforest 1,000 hectares costs around US \$200,000. Fernanda Wenzel, “How We Uncovered the Largest Land Grab in the Brazilian Amazon,” *Pulitzer Center*, June 26, 2023. <https://pulitzercenter.org/how-we-uncovered-largest-land-grab-brazilian-amazon>.

<sup>50</sup> Wenzel, Fernanda, “The \$20M Flip: The Story of the Largest Land Grab in the Brazilian Amazon,” *Mongabay*, February 2023. <https://news.mongabay.com/2023/02/the-20m-flip-the-story-of-the-largest-land-grab-in-the-brazilian-amazon/>.

to complete labor-intensive tasks, such as clearing remaining trees and brush, removing roots from the ground, planting pastures, and building fences.<sup>51</sup>

One worker who was rescued a few years ago but declined to be named has for two decades cleared forest for pastures on cattle ranches in São Félix do Xingu. Usually hired to lead groups cutting the forest, he explained that others would use the timber to build fences and corrals, and that the process ended with burning what remained.

Since the work involving heavy machinery is relatively expensive, the profitability of these illicit enterprises can depend on making the manual labor as cheap as possible. Yet obtaining—and maintaining—manual labor can be more costly in remote areas where there are few or no workers readily available, and no infrastructure to sustain them. To resolve this challenge, it is common for ranchers clearing the rainforest illegally to resort to deception, degrading conditions, and coercion.

## Deception and Abuse

Ranchers involved in illegal deforestation routinely use false promises of formal employment with decent wages and benefits to recruit their workers. As one federal labor prosecutor explained:

It's very common for us to find degrading work conditions along with the worker who was brought to that location with the false hope of having formal contracts, of receiving at least minimum wage, and of being provided with housing by the employer. And then when they arrive, they are faced with a completely different situation.<sup>52</sup>

Hiring workers informally—without contracts or the legal registration required by law—serves several functions for these ranchers. One is avoiding paper trails that

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<sup>51</sup> Climate Rights International interview with João Lucas Longhi Cechet, Labor Prosecutors Office (MPT), Marabá, Pará, May 15, 2025; *see also* Decker Sparks, Jessica et al. “Growing Evidence of the Interconnections Between Modern Slavery, Environmental Degradation, and Climate Change,” *One Earth* 4, no. 2, 181–191, 2021. <https://doi.org/10.1016/j.oneear.2021.01.015>.

<sup>52</sup> Climate Rights International interview with Sílvia Silva da Silva, Labor Prosecutors Office (MPT), Belém, Pará, May 13, 2025.



can implicate them in their environmental crimes. When environmental authorities conduct enforcement operations to crack down on illegal deforestation, they find only the workers who are clearing the rainforest but no evidence of who hired them there to do it.



A man waits inside a low budget hotel in São Félix do Xingu, Pará, where ranchers often come to find people to work on their farms. “Here cattle are treated better than workers,” another man at the hotel told Climate Rights International. Credit: Fernando Martinho for CRI.

Manoel, a 47-year-old former farm hand, had been working as a cowboy until he hurt his leg and was forced to work building fences and doing other manual labor, like clearing vegetation. He told Climate Rights International that workers are lured in with high salary promises and told they will be paid even more if they agree to work off the books. “Around half of the farms are okay,” he said, recounting his own experience with different employers, “but half of them are very bad.”<sup>53</sup> João, 49, another worker, told Climate Rights International that it is common to live in tarpaulin-covered shacks in the middle of the forest, receive less than the agreed-

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<sup>53</sup> Climate Rights International interview with “Manoel,” São Félix do Xingu, Pará May 18, 2025.

upon wages, and incur debts for food, often sold at exorbitant prices by the employers themselves.<sup>54</sup>

Another function of informality is cost-cutting. This includes avoiding mandatory payroll expenses like social security, occupational accident insurance, and severance funds, which together increase labor costs by around a third.<sup>55</sup> It can also include denying the unreported workers other basic guarantees and benefits to which formal employees are entitled in Brazil.<sup>56</sup> These guarantees and benefits that are denied include:

- **Reasonable working hours.** Workers are required to work exhaustive schedules, including overtime, weekends, and on holiday without legally mandated compensation.
- **Protective equipment and safety training.** Workers are made to handle toxic pesticides and herbicides, combustible liquids, sharp materials, electrical hazards, and dangerous tools and machinery (including chainsaws) without personal protective equipment and safety trainings.
- **Sanitation.** Workers aren't provided bathrooms or latrines and must relieve themselves in the forest, risking exposure to venomous animals and contaminating water supply.
- **Drinking water.** Workers aren't provided potable water and, in some cases, must drink from the same streams or watering holes where they bathe and relieve themselves.
- **Shelter.** Workers aren't provided adequate lodging and must sleep in the forest, under plastic tarps, over dirt floors, exposed to inclement weather, insects, and predatory animals.
- **Food.** Workers aren't provided adequate food or adequate equipment to store or safely prepare what they have.

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<sup>54</sup> Climate Rights International interview with “João,” São Félix do Xingu, Pará, May 18, 2025.

<sup>55</sup> Social Security Contributions are 20% of salary, Severance Fund is 8% of the employee's salary, and Occupational Accident Insurance ranges from 1–3% of salary. “INSS Patronal: cálculo, alíquotas e dúvidas,” *CLM Controller*, Accessed September 12, 2025, <https://clmcontroller.com.br/recursos-humanos/inss-patronal/>.

<sup>56</sup> Brazil. “Decreto-Lei no. 5.452. Consolidated Labor Laws (Consolidação das Leis do Trabalho – CLT,” *Presidency of the Republic Civil House*, Accessed July 11, 2025. [http://www.planalto.gov.br/ccivil\\_03/decreto-lei/del5452.htm](http://www.planalto.gov.br/ccivil_03/decreto-lei/del5452.htm).

As a result of these labor violations, the workers are often found to have been subjected to conditions analogous to slavery as defined under Brazilian law.<sup>57</sup>

## Coercion

Ranchers involved in illegal deforestation rely on a range of coercive tools to deter workers subject to abusive conditions from leaving their jobs. These include:

### Debt Bondage

One of the most common tools of coercion on Brazilian cattle ranches is debt.<sup>58</sup> Workers often arrive already indebted to their employers after being recruited by middlemen with promises of salary advances, only to be told upon arrival that they must pay for transportation and food provided during the journey. In some cases, they're then forced to purchase tools and protective equipment that should be provided free of charge, but are instead sold to them at "absurd" prices "well above the market average."<sup>59</sup> In some cases, workers are also required to purchase their own food and as well as basic supplies from canteens operated by their employer.<sup>60</sup>

Workers typically have no means of payment other than the wages they earn, but many employers systematically withhold those wages until work is completed or never pay them at all. A recently rescued worker in São Félix do Xingu described the system's trap: his employer provided no food to workers except what they bought at the company store. Since he didn't pay them, workers could only obtain food by going into debt to him.

We were supposed to get the advance payment about 10 days after we got there. But where was it? I was there for a month and there was never any money.<sup>61</sup>

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<sup>57</sup> Ministry of Labor and Employment, "Normative Instruction No. 2 of 8 November 2021, Section II, art. 23," *Ministry of Labor and Employment*, Accessed September 12, 2025. <https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/in-2-de-8-de-novembro-de-2021.pdf>.

<sup>58</sup> Brandão, Juliana, et al. "Behind the Cattle Industry: Modern Slave Labor Used to Produce Brazil's Beef and Leather." *SSRN*, October 3, 2023. <https://ssrn.com/abstract=4590747>.

<sup>59</sup> Climate Rights International interview with Sílvia Silva da Silva, Labor Prosecutors Office (MPT), Belém, Pará, May 13, 2025.

<sup>60</sup> Ibid.

<sup>61</sup> Climate Rights International interview with "Junior," São Félix do Xingu, Pará, May 18, 2025.

The indebted workers face a cruel choice: endure the abusive conditions until they can pay off what they supposedly owe or leave empty-handed and possibly deeper in debt than when they arrived.

## **Geographical Isolation**

Another common tool of coercion is geography. The properties where workers are most exploited are often tens—even hundreds—of kilometers from the nearest town or highway. And with no cellular service or internet, the workers are effectively cut off from the outside world. "They have no way to ask for help," one federal labor prosecutor said.<sup>62</sup>

João, has worked on cattle ranches in Pará state for the last nine years. He told Climate Rights International that he once spent 150 days without any contact with his family because the shack where he was lodged—which had no electricity or toilets—was 27 kilometers from the nearest signal. "Here, cattle are treated better than workers," he said.

Even more critically, when working conditions become abusive or unbearable, they have no way to leave. The only transport available are cars owned by the employer. Attempting to walk out means traversing enormous distances through difficult and potentially dangerous terrain. One federal prosecutor recalled the case in which a rancher abandoned a worker at the entrance to the ranch and told him he was "free." According to the official, the employer figured that if the worker tried to go, he would likely never make it and might die trying.<sup>63</sup>

## **Violence**

Perhaps the most potent tool of coercion is the fear of violence. Workers on abusive properties are often kept under armed watch, according to federal prosecutors and civil society experts.<sup>64</sup> Advocates who work with rescued laborers told Climate

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<sup>62</sup> Climate Rights International interview with Silvia Silva da Silva, Labor Prosecutors Office (MPT), Belém, Pará, May 13, 2025.

<sup>63</sup> Climate Rights International Interview with Igor da Silva Spindola, Federal Prosecutor (MPF), Marabá, Pará, May 15, 2025.

<sup>64</sup> Climate Rights International Interview with Igor da Silva Spindola, Federal Prosecutor (MPF), Marabá, Pará, May 15, 2025; Climate Rights International interview with Silvia Silva da Silva, Labor Prosecutors Office (MPT), Belém, Pará, May 13, 2025.

Rights International that they had received reports of "many death threats" against workers.<sup>65</sup> Similarly, one labor prosecutor said, "In many cases, threats are used as a tool to keep workers under control, preventing them from reporting [abuses] or trying to escape."<sup>66</sup>

The impact of these threats is heightened by the region's long-standing history of violence. Since the 1980s, more than 200 workers have been murdered on ranches in Pará state alone—including dozens of cases where the victims were workers who tried to escape—according to a local director of the Pastoral Land Commission (Comissão Pastoral da Terra, CPT), an organization affiliated with the Catholic Church that maintains one of the most comprehensive databases on rural violence in the country.<sup>67</sup> According to Batista, these murders often occurred within the ranches, with victims' bodies buried in the forest or thrown in rivers.<sup>68</sup> The perpetrators of these crimes are rarely brought to justice, and the resulting impunity contributes to the climate of fear among workers.<sup>69</sup>

A recently rescued worker told Climate Rights International that the owners of the property had reputations as "dangerous people" with connections to a band of "matadores" (killers) that operated out of a neighboring municipality. He and his fellow workers knew they were being mistreated—going unpaid while working excessively long hours, sleeping under a tarp, and drinking water they believed to be polluted—but they remained silent about their plight out of fear for their lives.<sup>70</sup> Even months after they had been rescued from the property by the authorities, they

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<sup>65</sup> Climate Rights International Interview with Yoná Luma, Executive Coordinator of the Center of Defense of Life and Human Rights Carmen Bascarán. Original Portuguese, Açailândia, Maranhão, May 12, 2025.

<sup>66</sup> Climate Rights International interview with Sílvia Silva da Silva, Labor Prosecutors Office (MPT), Belém, Pará, May 13, 2025.

<sup>67</sup> Climate Rights International Interview with José Batista Afonso, Lawyer for the Comissão Pastoral da Terra in Marabá, May 15, 2025.

<sup>68</sup> The book *Masters of the Lost Land* documented several cases of rural workers' bodies being found on ranches and the climate of impunity surrounding such violence and murders. See Araújo, Heriberto. "Masters of the Lost Land: The Untold Story of the Amazon and the Violent Fight for the World's Last Frontier," New York: *Mariner Books*, 2023.

<sup>69</sup> Ibid.; see also Human Rights Watch, "Rainforest Mafias: How Violence and Impunity Fuel Deforestation in Brazil's Amazon," *Human Rights Watch*, September 17, 2019. <https://www.hrw.org/report/2019/09/17/rainforest-mafias/how-violence-and-impunity-fuel-deforestation-brazils-amazon>.

<sup>70</sup> Climate Rights International interview with "Junior," São Félix do Xingu, Pará, May 18, 2025.

remained scared—so much so that one chose to leave the region entirely to put himself beyond the reach of the former boss.<sup>71</sup>

During a visit to São Félix do Xingu, Climate Rights International found this sort of acute fear to be common among people who had worked on ranches. All the workers interviewed for this report requested their identities be withheld, and others declined to speak at all.

“Workers who do know their rights are often afraid to pursue them due to the power imbalance with employers,” a rural workers union official in São Félix do Xingu told Climate Rights International.<sup>72</sup> “They think that at any moment the employer could come after them.”<sup>73</sup> Under these circumstances, the workers are “afraid to even talk about” the abuse they have suffered. Sometimes the union itself counsels them to remain silent.<sup>74</sup>

## *Disincentivizing Forced Labor*

One of Brazil's principal tools for combatting forced labor and other serious labor abuses is a public registry—known as the “Dirty List”—naming employers found by the Ministry of Labor and Employment to have subjected workers to conditions analogous to slavery.<sup>75</sup> The Ministry places employers on the list following an administrative process that allows them to defend against the allegations of wrongdoing. While listed, the offenders—which can be individual people or companies—are barred from receiving public financing, including access to rural credit lines offered by the government for agricultural activities. These restrictions apply to all of the listed employer's business operations and properties, not just the one where abuses have occurred. Offenders are removed from the list after two years if they've settled all financial obligations to affected workers, paid their

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<sup>71</sup> Ibid.

<sup>72</sup> Climate Rights International interview with Driana Carvalho, Rural Workers Union of São Félix do Xingu, May 19, 2025.

<sup>73</sup> Ibid.

<sup>74</sup> Ibid.

<sup>75</sup> International Labour Organization (ILO), “The Good Practices of Labour Inspection in Brazil: The Eradication of Labour Analogous to Slavery,” *International Labour Organization*, Brasília, 2010. [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed\\_norm/@declaration/documents/publication/wcms\\_155946.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_155946.pdf).



government-imposed fines, and haven't engaged in further abuses of their workforce.



Workers trapped in forced labor are often recruited from poorer states, isolated from their communities, and have limited literacy—factors that make them more vulnerable to exploitation. Credit: Fernando Martinho for CRI.

Beef and leather exporters could play a critical role in curbing the economic incentive driving these abuses. If enough of them stopped sourcing cattle raised by people on the Dirty List, they could make it more difficult for ranchers to profit off their abusive practices. Indeed, as discussed in Chapter IV, most major slaughterhouses have committed to doing just that under the legally binding “Beef TAC” agreement they have signed with the Federal Prosecutor's Office. Yet while they have made significant progress in fulfilling this commitment when it comes to their direct suppliers, their efforts to screen out indirect suppliers linked to forced labor and conditions analogous to slavery have been far less effective.

### III. Indigenous Land Invasions

Indigenous territories play a critical role in safeguarding Brazil's forests. Covering nearly a quarter of the country's Amazon region—more than a million square kilometers—they account for only a small fraction of its forest loss.<sup>76</sup> Multiple studies have shown that Indigenous lands experience significantly lower deforestation rates than non-Indigenous areas, in large part because of the active land stewardship practiced by many Indigenous communities, whose sustainable land-use methods and deep cultural ties to the forest have helped preserve ecosystems over generations.<sup>77</sup>

The Brazilian Constitution affirms Indigenous peoples' inalienable rights over the lands they have traditionally occupied, recognizing their permanent and exclusive possession of these territories.<sup>78</sup> Yet many Indigenous communities have long faced invasions by outsiders seeking to use their lands, with cattle production being the primary driver. As of 2020, invaders have sought to lay claim to more than 120,000 square kilometers of Indigenous lands across Brazil—an area nearly three times the

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<sup>76</sup> In 2024, Indigenous lands represented just 1.3% of Brazil's total deforestation, despite hosting vast tracts of rainforest. MapBiomas, "RAD 2024 Report," May 15, 2025. [https://alerta.mapbiomas.org/wp-content/uploads/sites/17/2025/05/RAD2024\\_15.05.pdf](https://alerta.mapbiomas.org/wp-content/uploads/sites/17/2025/05/RAD2024_15.05.pdf). According to this study, Indigenous lands cover 23% of the Legal Amazon, and together with other protected areas, they account for only 5% of net forest loss, Baragwanath, Kathryn, and Ella Bayi. "Collective Property Rights Reduce Deforestation in the Brazilian Amazon." *Proceedings of the National Academy of Sciences* 117, no. 34, 2020: 20495-20502. <https://doi.org/10.1073/pnas.1917874117>.

<sup>77</sup> One peer-reviewed study found that legally recognized Indigenous territories in the Brazilian Amazon experienced 66 percent less deforestation than non-Indigenous areas. Kathryn Baragwanath and Ella Bayi, "Collective Property Rights Reduce Deforestation in the Brazilian Amazon," *Proceedings of the National Academy of Sciences* 117, no. 34, 2020: 20495–20502, <https://doi.org/10.1073/pnas.1917874117>. MapBiomas has documented that Indigenous territories have had the lowest deforestation rates of all land categories in Brazil in recent years. MapBiomas, RAD 2024 Report, May 15, 2025, [https://alerta.mapbiomas.org/wp-content/uploads/sites/17/2025/05/RAD2024\\_15.05.pdf](https://alerta.mapbiomas.org/wp-content/uploads/sites/17/2025/05/RAD2024_15.05.pdf). J. Schleicher et al., "Indigenous Lands Are Effective Carbon Sinks," *World Resources Institute*, 2023, <https://www.wri.org/insights/amazon-carbon-sink-indigenous-forests>. Indigenous lands have been shown to be just as effective—or even more effective—than other formally protected areas at preserving forest cover. FAO and FILAC, *Forest Governance by Indigenous and Tribal Peoples*, 2021, <https://www.fao.org/3/cb2953en/cb2953en.pdf>.

<sup>78</sup> Lands traditionally occupied by Indigenous peoples are intended for their permanent possession and they shall have the exclusive usufruct of the riches of the soil, the rivers and the lakes existing therein. The lands referred to are inalienable and indisposible and the rights thereto are not subject to limitation." Constitution of the Federative Republic of Brazil of 1988, art. 231, [https://www.planalto.gov.br/ccivil\\_03/constituicao/constituicao.htm](https://www.planalto.gov.br/ccivil_03/constituicao/constituicao.htm).

size of Switzerland.<sup>79</sup> These invasions surged under President Bolsonaro—who was openly dismissive of Indigenous territorial claims—with three times as many invasions reported in 2022 than in 2018, the year before he took office.<sup>80</sup> As invasions increased, deforestation in Indigenous territories rose as well.<sup>81</sup> While this trend has slowed under President Lula, Indigenous territories continue to suffer invasions and deforestation at high rates, and significant amounts of cattle continue to be grazed illegally by outsiders on their lands.<sup>82</sup>

In some cases, the scale of the cattle-driven deforestation has been massive. For example, in Pará, the Apyterewa Indigenous Territory has lost more than 470 square kilometers of forest since 2007, with 98 percent of this deforested land converted to illegal pasture for cattle.<sup>83</sup> In December 2023, federal prosecutors found nearly 60,000 head of cattle being raised within the territory.<sup>84</sup>

In the neighboring Trinchira Bacajá Territory, nearly 70 square kilometers of forest were cleared between 2018 and 2020, primarily for cattle pasture.<sup>85</sup> Elsewhere in Pará, the Ituna-Itatá Indigenous Territory—home to an Indigenous population living in voluntary isolation—has lost more than 220 square kilometers of forest.<sup>86</sup> In 2023, the government found 5,000 cattle that were being illegally grazed there.<sup>87</sup>

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<sup>79</sup> Paes, Caio de Freitas, “A Bid to Legitimize Invasions of Brazil’s Indigenous Lands Faces a Court Challenge,” *Mongabay*, June 10, 2020. <https://news.mongabay.com/2020/06/a-bid-to-legitimize-invasions-of-brazils-indigenous-lands-faces-a-court-challenge/>.

<sup>80</sup> Conselho Indigenista Missionário (CIMI), “Violence Against Indigenous Peoples in Brazil – Data for 2022,” July 2023, <https://cimi.org.br/2023/07/cimi-violence-against-indigenous-peoples-report-2022/>.

<sup>81</sup> Imazon. “Desmatamento em Terras Indígenas da Amazônia é o menor em seis anos.” *Imazon*, April 17, 2024. <https://imazon.org.br/imprensa/desmatamento-em-terras-indigenas-da-amazonia-e-o-menor-em-seis-anos/>.

<sup>82</sup> Ibid.

<sup>83</sup> Forests & Finance, “Rainforest to Illegal Pasture: JBS’ Impact on Apyterewa,” *Forests & Finance*, October 16, 2024. <https://forestsandfinance.org/news/bobc2024-rainforest-to-illegal-pasture-jbs-impact-on-apyterewa/>.

<sup>84</sup> Ibid.

<sup>85</sup> Guerreiro Neto, Guilherme, “Pollution Is One of the Footprints in the Chain of Amazon Destruction.” *InfoAmazonia*, August 25, 2021. <https://infoamazonia.org/en/2021/08/25/ok-pollution-is-one-of-the-footprints-in-the-chain-of-amazon-destruction/>.

<sup>86</sup> Lais Modelli, “In Brazilian Amazon, Indigenous lands stop deforestation and boost recovery,” *Mongabay*, May 13, 2022, <https://news.mongabay.com/2022/05/in-brazilian-amazon-indigenous-lands-stop-deforestation-and-boost-recovery/>.

<sup>87</sup> “Brazil Launches Biggest Operation Against Illegal Cattle Farms in the Amazon,” *The Guardian*, September 5, 2023, <https://www.theguardian.com/world/2023/sep/05/brazil-launches-biggest-operation-illegal-cattle-farms-amazon>.

In Maranhão State, over 70 percent of the Arariboia Indigenous Territory was impacted by fire in 2024, in large part due to pasture clearing.<sup>88</sup> Between February and April 2025, the federal government estimated that it had removed between 1000 and 2000 head of cattle that were being illegally grazed in the territory.<sup>89</sup>



The community of São José, the largest village in the Krikati Indigenous Territory in Maranhão. Credit: Fernando Martinho for CRI.

## *Impact on Indigenous Communities*

The illegal cattle ranching in these territories has had an enormously disruptive impact on local Indigenous populations. In the Apyterewa Indigenous Territory, for example, the outside invaders have built 210 houses, churches, shops, a school and

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<sup>88</sup> Government of Brazil, SECOM – Secretariat for Social Communication, “Disintrusion at Araribóia Indigenous Lands: How Removing Invaders Can Reduce Fires, Protect Water Cycle.” March 20, 2025. <https://www.gov.br/secom/en/latest-news/2025/03/disintrusion-at-arariboia-indigenous-lands-how-removing-invaders-can-reduce-fires-protect-water-cycle>.

<sup>89</sup> Karla Mendes, “Pulitzer Center–Supported Investigation Spurs Brazil Crackdown on Illegal Cattle in the Amazon,” *Pulitzer Center*, <https://pulitzercenter.org/stories/pulitzer-center-supported-investigation-spurs-brazil-crackdown-illegal-cattle-amazon>.

a gas station, and their population now outnumbers the territory's Parakanã Indigenous people, who are confined to just 25 percent of their land.<sup>90</sup>

In the Krikati Indigenous Territory in Maranhão, outsiders have established permanent settlements, with homes, roads, fences, electricity lines, and churches, cutting the community off from some of their most important traditional fishing and hunting grounds that have sustained their families for generations.<sup>91</sup> In 2017, a federal judge ordered non-Indigenous occupants of the territory to halt the expansion of agricultural activities, including pasture, in the territory.<sup>92</sup> Despite this legal intervention, the destruction continued: in 2022, the Federal Prosecutor's Office found that more than 13 square kilometers had been deforested since the order, much of it due to cattle operations.<sup>93</sup>

On a visit to Krikati territory in May 2025, Climate Rights International observed large tracts of pasture and freshly cut forest within the invaded areas. "We used to live from fishing and hunting," Chief Maurício Krikati recounted during an interview in the community of São José. "Today, when we go to hunt, there's only cattle, cattle raising, pasture."<sup>94</sup> He and other community members said that the deforestation has dried up streams and rivers that were traditionally significant fishing grounds, while destroying areas used for foraging and collecting.<sup>95</sup> "We can no longer gather the raw materials to build our traditional straw houses," explained Edilena Krikati, a community member who serves as regional coordinator of Brazil's federal agency responsible for protecting Indigenous rights and territories. "Fruits we used to collect and that once existed, are becoming more and more scarce."<sup>96</sup>

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<sup>90</sup> Ministério Público Federal (MPF), "MPF Accompanies Operation to Remove Non-Indigenous People from Apyterewa and Trincheira-Bacajá Indigenous Territories in Pará." MPF Press Office, accessed September 16, 2025. <https://www.mpf.mp.br/pa/sala-de-imprensa/noticias-pa/mpf-acompanha-operacao-para-retirada-de-nao-indigenas-dos-territorios-apyterewa-e-trincheira-bacaja-no-para-1>.

<sup>91</sup> Ministério Público Federal, Manifestação no processo nº 0005601-78.2017.4.01.3701 (Ação Civil Pública), PRM-Imperatriz-MA, Gabinete do 2º Ofício, 2022.

<sup>92</sup> Ibid.

<sup>93</sup> Ibid.

<sup>94</sup> Climate Rights International Interview with Maurício Krikati, Aldeia São José, Maranhão, May 10, 2025.

<sup>95</sup> Climate Rights International Interview with Maurício Krikati, Aldeia São José, Maranhão, May 10, 2025; Climate Rights International Interview with Leticia Krikati, Aldeia São José, Maranhão, May 10, 2025.

<sup>96</sup> Climate Rights International interview with Edilena Krikati, FUNAI regional coordinator, *Imperatriz*, MA, May 12, 2025.





Krikati women participate in a traditional ceremony that includes a 10km relay race with a 100lb log. Invasions have limited the communities' access to some of their ancestral lands. Credit: Fernando Martinho for CRI.

Illegal cattle ranching has also fueled violence. In the Arariboia Indigenous Territory, almost 40 people have been killed in land conflicts over the past three decades, including four in 2023.<sup>97</sup> A recent investigation found that the areas within that territory with the most violent incidents coincided with illegal cattle ranching and logging activities.<sup>98</sup>

The Krikati Indigenous Territory has also seen deaths from land conflicts and related pressures, and community members told Climate Rights International they are now often afraid to move through their ancestral lands.<sup>99</sup> "For us to enter [some of these

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<sup>97</sup> Mendes, Karla, "Revealed: Illegal Cattle Boom in Arariboia Territory in Deadliest Year for Indigenous Guajajara." *Pulitzer Center*, June 19, 2024. <https://pulitzercenter.org/stories/revealed-illegal-cattle-boom-arariboia-territory-deadliest-year-indigenous-guajajara>.

<sup>98</sup> Ibid.

<sup>99</sup> In 2017, CIMI documented the murder of Nogueira Krikati, who was beaten to death while sleeping, and the murder of 25-year-old Jaqueline Lopes de Souza Guajajara, who was stabbed to death. The organization

areas], we have to cut a padlock, and they tell us that if we cut it or force our way in, they'll shoot," Chief Maurício said. He reports being followed on several occasions when leaving the village by non-Indigenous men on motorbikes and in trucks.<sup>100</sup>

Another community member, who guided federal agents during a 2017 enforcement operation meant to remove non-Indigenous occupants from the territory, said that the agents warned him: "When we finish here, it's going to be bad for you, because they will know that you accompanied us."<sup>101</sup> Leticia Krikati, a member of the municipality's elected governing council, said that she has received threats and never travels alone when fulfilling her elected duties outside of the territory: "We take every precaution, so we don't get caught in an ambush."<sup>102</sup>



Bullet holes are visible in a sign for a village in the Krikati Indigenous territory. Credit: Fernando Martinho for CRI.

reported that in the first six months of 2017 alone, there were 15 deaths among the 1,200 Krikati people related to the "harsh context they are subjected to," including three suicides, one murder, and 11 deaths from alcoholism linked to the stress of ongoing land conflicts. Renato Santana, "TI Krikati Sofre com Assassinato, Suicídios, Invasões e Decisão da Justiça Federal por Novo Laudo Demarcatório," *Conselho Indigenista Missionário (CIMI)*, August 18, 2017, <https://cimi.org.br/2017/08/39858/>.

<sup>100</sup> Climate Rights International Interview with Maurício Krikati, Aldeia São José, Maranhão, May 10, 2025.

<sup>101</sup> Climate Rights International interview with Krikati community member who requested anonymity.

<sup>102</sup> Climate Rights International Interview with Leticia Krikati, Aldeia São José, Maranhão, May 10, 2025.

## Disincentivizing Invasions

Brazil has sought to deter Indigenous land invasions by explicitly prohibiting the primary economic activities that drive them. A 1973 law provides that, within the territories, “any person outside of the tribal groups or Indigenous communities is prohibited from ... engaging in agricultural or extractive activities.”<sup>103</sup> Two federal agencies—FUNAI (the National Indigenous Foundation) and IBGE (Brazil’s national statistics and mapping agency)—publish official digital maps online showing the precise boundaries of all legally recognized Indigenous Territories to help ensure compliance with this prohibition.<sup>104</sup>

Yet enforcing compliance with this prohibition has proven very challenging. Rancher-led invasions are often organized on a large scale—and sometimes coordinated by powerful criminal networks—making it difficult for local authorities to intervene effectively.<sup>105</sup> Once inside, ranchers frequently resist efforts to remove their cattle so aggressively that enforcement operations require military-style logistics. Government teams must mobilize large contingents of agents, establish remote camps, and spend days securing access.<sup>106</sup> While the Lula administration has prioritized enforcement of this prohibition—carrying out major enforcement actions that included the removal of 5,000 head of cattle from Ituna-Itatá Indigenous

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<sup>103</sup> Art. 18. Indigenous lands may not be leased or subject to any legal act or transaction that restricts the full exercise of direct ownership by the indigenous community or forest dwellers. § 1. In these areas, any person outside of the tribal groups or Indigenous communities is prohibited from hunting, fishing, or gathering fruit, as well as from engaging in agricultural or extractive activities.” Brazil, *Statute of the Indian* (Law No. 6,001, December 19, 1973), art. 18, § 1; art. 26, accessed August 2, 2025. [http://www.planalto.gov.br/ccivil\\_03/LEIS/L6001.htm](http://www.planalto.gov.br/ccivil_03/LEIS/L6001.htm).

<sup>104</sup> Brazil, Fundação Nacional dos Povos Indígenas (FUNAI), “Terras Indígenas: Dados Geoespaciais e Mapas.” FUNAI, published November 11, 2020; updated August 20, 2025; <sup>104</sup> Brazil, Instituto Brasileiro de Geografia e Estatística (IBGE). *Mapas Indígenas 2*. Accessed August 6, 2025. <https://indigenas.ibge.gov.br/mapas-indigenas-2>.

<sup>105</sup> Terrence McCoy and Júlia Barbon, “South America’s Most Dangerous Gang Invades the Amazon Forest,” *Washington Post*, December 16, 2024, <https://www.washingtonpost.com/world/2024/12/16/amazon-pcc-cartels-indigenous-mining/>; Rafael Moro, “Brazil Launches Biggest Operation against Illegal Cattle Farms in Indigenous Amazon,” *The Guardian*, September 5, 2023, <https://www.theguardian.com/world/2023/sep/05/brazil-launches-biggest-operation-illegal-cattle-farms-amazon>; Human Rights Watch, *Rainforest Mafias: How Violence and Impunity Fuel Deforestation in Brazil’s Amazon*, September 17, 2019, <https://www.hrw.org/report/2019/09/17/rainforest-mafias/how-violence-and-impunity-fuel-deforestation-brazils-amazon>.

<sup>106</sup> Wenzel, Fernanda, “The Harsh, Dangerous Gig of Seizing Thousands of Illegal Cattle in the Amazon,” *Mongabay*, June 13, 2024, <https://news.mongabay.com/2024/06/the-harsh-dangerous-gig-of-seizing-thousands-of-illegal-cattle-in-the-amazon/>.



Territory in 2023 and as many as 2,000 from the Arariboia Indigenous Territory in early 2025—the scale and complexity of these operations underscore the difficulty of sustained enforcement across the full breadth of the Amazon and Cerrado regions.<sup>107</sup>

Meanwhile, ranchers flouting the prohibition have long been able to profit from land invasions by selling the cattle raised illegally on the Indigenous lands into the supply chains of major meatpackers. One academic study estimated that, between 2013 and 2018, around 264,000 head of cattle sold to slaughterhouses in Pará state had been raised illegally in Indigenous lands.<sup>108</sup> An investigation by the nongovernmental organization Earthsight found that, between 2020 and 2023, 33 ranchers charged by the Federal Prosecutor's Office with illegal ranching within the Apyterewa Indigenous Territory had sold over 17,000 head of cattle to a single slaughterhouse—though available data did not allow them to determine how many of these cattle originated within the territory.<sup>109</sup> Climate Rights International's review of recent investigations by journalists and NGOs identified more than 50 additional reported instances in which the supply chains of slaughterhouses and tanneries contained ranchers linked to Indigenous land invasions.<sup>110</sup>

Under these circumstances, meatpackers could play a critical role in curbing the economic incentive driving these invasions. If enough of them stopped buying cattle raised illegally on Indigenous lands, they could make it more difficult for the invaders to profit off their illicit activities. Indeed, as discussed in Chapter IV, most major slaughterhouses have committed to doing just that under the legally binding “Beef TAC” agreement they have signed with the Federal Prosecutor's Office. Yet while they have made significant progress in fulfilling this commitment when it comes to their direct suppliers, their efforts to screen out indirect suppliers linked to Indigenous land invasions have been far less effective.

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<sup>107</sup> Rafael Moro, “Brazil Launches Biggest Operation Against Illegal Cattle Farms in the Amazon,” *The Guardian*, September 5, 2023, <https://www.theguardian.com/world/2023/sep/05/brazil-launches-biggest-operation-illegal-cattle-farms-amazon>; Mendes, Karla. “Pulitzer Center–Supported Investigation Spurs Brazil Crackdown on Illegal Cattle in the Amazon,” *Pulitzer Center*, <https://pulitzercenter.org/stories/pulitzer-center-supported-investigation-spurs-brazil-crackdown-illegal-cattle-amazon>.

<sup>108</sup> West, Thales A. P., et al. “A Global Assessment of Indigenous and Community Conservation Areas,” *Conservation Letters*, October 17, 2022, <https://doi.org/10.1111/conl.12916>.

<sup>109</sup> Earthsight, “The Hidden Price of Luxury: What Europe's Designer Handbags Are Costing the Amazon Rainforest,” *Earthsight*, June 24, 2025. <https://www.earthsight.org.uk/news/hidden-price-luxury>.

<sup>110</sup> See Appendix A for list of reports.

## IV. Monitoring Cattle Supply Chains

In 2009, two landmark investigations—one by the Federal Prosecutors Office and another by Greenpeace—revealed the central role of cattle ranching in driving illegal deforestation in the Amazon.<sup>111</sup> Ranchers were found to be clearing vast areas of rainforest without legal authorization, often far beyond the limits established by Brazil's Forest Code.<sup>112</sup> Federal prosecutors also identified cattle ranching as the sector most frequently associated with forced labor. At the same time, the investigations found that slaughterhouses and major retailers were failing to conduct proper due diligence, allowing cattle linked to environmental crimes and labor abuses to enter the legal market unchecked.<sup>113</sup>

In response to these revelations, two major agreements were established to bring greater oversight to the cattle industry. The Federal Public Prosecutor's Office established the Beef TAC (Term of Adjustment of Conduct), a legally binding agreement with numerous leading meatpackers and supermarkets requiring them to verify that cattle they purchased in Pará state did not come from illegally deforested land, Indigenous territories (and other protected areas), or employers on the “slavery” Dirty List.<sup>114</sup> Separately, Greenpeace negotiated the Public Commitment on Cattle Ranching (also known as the “G4 Agreement”) with Brazil's four largest meatpackers—Bertin, JBS, Marfrig, and Minerva—under which they committed to

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<sup>111</sup> Ministério Público Federal (MPF), Caso Carne Legal Daniel. IX Encontro Temático da 4ª CCR, accessed August 5, 2025. [https://www.mpf.mp.br/atuacao-tematica/ccr4/dados-da-atuacao/eventos/encontros/nacionais-da-4a-ccr/ix-encontro-tematico/documentos/caso\\_carne\\_legal\\_daniel.pdf](https://www.mpf.mp.br/atuacao-tematica/ccr4/dados-da-atuacao/eventos/encontros/nacionais-da-4a-ccr/ix-encontro-tematico/documentos/caso_carne_legal_daniel.pdf); Greenpeace. “Slaughtering the Amazon.” *Greenpeace*, June 9, 2009. [https://www.greenpeace.ch/static/planet4-switzerland-stateless/2019/05/d8a74e93-d8a74e93-2009\\_zf\\_slaughteringtheamazon\\_en.pdf](https://www.greenpeace.ch/static/planet4-switzerland-stateless/2019/05/d8a74e93-d8a74e93-2009_zf_slaughteringtheamazon_en.pdf).

<sup>112</sup> Greenpeace, “Slaughtering the Amazon.” *Greenpeace*, June 9, 2009. [https://www.greenpeace.ch/static/planet4-switzerland-stateless/2019/05/d8a74e93-d8a74e93-2009\\_zf\\_slaughteringtheamazon\\_en.pdf](https://www.greenpeace.ch/static/planet4-switzerland-stateless/2019/05/d8a74e93-d8a74e93-2009_zf_slaughteringtheamazon_en.pdf).

<sup>113</sup> Greenpeace, *Slaughtering the Amazon*. Washington, DC: Greenpeace USA, 2009. [https://www.greenpeace.ch/static/planet4-switzerland-stateless/2019/05/d8a74e93-d8a74e93-2009\\_zf\\_slaughteringtheamazon\\_en.pdf](https://www.greenpeace.ch/static/planet4-switzerland-stateless/2019/05/d8a74e93-d8a74e93-2009_zf_slaughteringtheamazon_en.pdf).

<sup>114</sup> Ministério Público Federal (MPF), *Acordo da Carne*, 2013. <https://www.mpf.mp.br/pa/sala-de-imprensa/documentos/2013/acordo-da-carne>; See also Amigos da Terra. “Terms of Adjustment of Conduct in Pará and the Public Commitment on Cattle Ranching.” *Amigos da Terra*, August 2020. <https://amigosdaterra.org.br/wp-content/uploads/2020/08/ADT-tac-compromisso-EN.pdf>.



similar standards of traceability and compliance for the entire Amazon biome.<sup>115</sup> (Bertin was later absorbed by JBS.)



JBS operates slaughterhouses and tanneries in Brazil. Credit: Fernando Martinho for CRI.

Over time, the Beef TAC expanded its reach, incorporating more slaughterhouses and extending to other Amazon states.<sup>116</sup> Meanwhile, the G4 Agreement lost momentum, and Greenpeace withdrew from the initiative in 2017, citing lack of progress by the companies. Today, the Beef TAC, which requires independent audits and a transparent protocol to ensure compliance with its terms, stands as the most robust enforcement tool for supply chain accountability in Brazil's cattle sector.

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<sup>115</sup> Imazon. "Extensive Production Practices and Incomplete Implementation Hinder Brazil's Zero-Deforestation Cattle Agreements in Pará. Belém," *Imazon*, 2020. <https://imazon.org.br/en/publicacoes/extensive-production-practices-and-incomplete-implementation-hinder-brazils-zero-deforestation-cattle-agreements-in-para>.

<sup>116</sup> Currently, 120 slaughterhouses have signed the Beef TAC (TAC da Carne). In addition to Pará, the initiative now covers all the states of the Legal Amazon, including Acre, Amapá, Amazonas, Maranhão, Mato Grosso, Rondônia, Roraima, and Tocantins. Beef on Track (Imaflora in partnership with the Federal Public Prosecutor's Office), "Beef on Track Program – Transparency Platform for the Beef Supply Chain in the Legal Amazon," *Beef on Track*, accessed September 12, 2025. <https://www.beefontrack.org/>.

Thanks largely to the Beef TAC, leading meatpackers have developed elaborate systems to screen out ranchers linked to illegal deforestation, forced labor, or Indigenous land invasions.<sup>117</sup> This screening has been made possible, in large part, by the tools—discussed in previous chapters—that Brazil has developed to deter environmental crimes and human rights abuses: the Rural Environmental Registry (CAR), the registry of environmental embargos, the “slavery” Dirty List, and the digitalized maps of Indigenous territories, among others.

The Federal Prosecutor’s Office has also made good use of these tools to monitor the meatpackers’ compliance with the Beef TAC. Its reviews have exposed egregious failures: in 2020, for example, federal prosecutors found that more than 30 percent of the cattle bought by JBS in Pará state between January 2018 and June 2019 had come from ranches with “irregularities” such as illegal deforestation.<sup>118</sup>

Yet they have also documented important advances. In May 2025, the Federal Prosecutor’s Office released the results of a comprehensive audit of cattle transactions in six Amazon states during 2022.<sup>119</sup> The audit found significant progress had been made by the slaughterhouses that have signed the Beef TAC and voluntarily submitted to independent third-party audits: only four percent of farms from which they directly purchased cattle were linked to illegal deforestation, companies or individuals on the Dirty List, indigenous land invasions, or other forms of non-compliance.<sup>120</sup>

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<sup>117</sup> Gibbs, Holly K., et al. “Did Ranchers and Slaughterhouses Respond to Zero-Deforestation Agreements in the Brazilian Amazon?” *Conservation Letters* 9, no. 1, April 21, 2015: 32-42. <https://doi.org/10.1111/conl.12175>.

<sup>118</sup> Mano, Ana. “Brazil Audit Finds 32% of JBS Cattle in Amazon State from ‘Irregular’ Farms.” *Reuters*, October 7, 2021. <https://www.reuters.com/business/sustainable-business/brazil-audit-finds-32-jbs-cattle-amazon-state-irregular-farms-2021-10-07/>.

<sup>119</sup> Ministério Público Federal (MPF), “Carne Legal: Frigoríficos Signatários do TAC na Amazônia Têm 13 Vezes Menos Irregularidades que os Demais.” *Procuradoria da República no Pará*, July 4, 2018. <https://www.mpf.mp.br/pa/sala-de-imprensa/noticias-pa/carne-legal-frigorificos-signatarios-do-tac-na-amazonia-tem-13-vezes-menos-irregularidades-que-os-demais>.

See also O Eco. “Ao menos 6 milhões de cabeças de gado no Pará estão irregulares entre indiretos.” *O Eco*, May 14, 2025. Available at: <https://oeco.org.br/reportagens/ao-menos-6-milhoes-de-cabecas-de-gado-no-para-estao-irregulares-entre-indiretos/>.

<sup>120</sup> In stark contrast, slaughterhouses that had not signed the Beef TAC or submitted to independent audits showed an average non-compliance rate of 52 percent—and a rate exceeding 60 percent in the states of Pará, Acre, and Amazonas, *Ibid*.

Despite this apparently strong performance with direct suppliers, however, the recent audit also laid bare what has long been—and remains—a glaring hole in the companies' sourcing practices: their *indirect* suppliers. According to the audit, only 38 percent of the farms that supplied the direct suppliers of the slaughterhouses were verifiably compliant.<sup>121</sup>

## *The Indirect Supplier Problem*

Cattle supply chains in Brazil—particularly in the Amazon—typically involve a sequence of multiple farms.<sup>122</sup> These begin with small-scale breeders who raise calves and sell them to other farms for fattening, which then sell to the finishing farms that ultimately sell the animals to the meatpackers for slaughter.<sup>123</sup> For every direct supplier to a slaughterhouse, there are often 20 or more indirect suppliers, whose cattle pass through one or more intermediary properties before reaching a slaughterhouse.<sup>124</sup>

This complex structure facilitates a practice widely known in Brazil as “cattle laundering”: animals raised on farms linked to illegal deforestation and/or abuses are transferred through “clean” intermediary farms and ultimately enter the supply chains of major slaughterhouses undetected.<sup>125</sup> “Everyone does this,” a prominent rancher in Rondônia told investigators from Repórter Brasil, Greenpeace, and *The Guardian*, echoing accounts these investigators heard from dozens of cattle

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<sup>121</sup> Ibid.

<sup>122</sup> Zu Ermgassen et al, “Addressing Indirect Sourcing in Zero Deforestation Commodity Supply Chains.” *Science Advances* 8, no. 17, 2022. <https://www.science.org/doi/10.1126/sciadv.abn3132>.

<sup>123</sup> National Wildlife Federation (NWF) & Grupo de Trabalho da Pecuária Sustentável (GTPS), “Cattle Traceability and Monitoring in Brazil,” *Global Traceability & Finance Initiative / National Wildlife Federation*, November 2023. [https://gtfi.org.br/gtfti\\_site2020/wp-content/uploads/2023/11/Cattle-Traceability-and-Monitoring-in-Brazil-Nov27-NWF-2023-1.pdf](https://gtfi.org.br/gtfti_site2020/wp-content/uploads/2023/11/Cattle-Traceability-and-Monitoring-in-Brazil-Nov27-NWF-2023-1.pdf).

<sup>124</sup> Climate Rights International interview with Mauro Armelin, director of the NGO Amigos da Terra Amazônia Brasileira and a leading expert on the cattle sector, March 28, 2025.

<sup>125</sup> National Wildlife Federation (NWF) & Grupo de Trabalho da Pecuária Sustentável (GTPS), “Cattle Traceability and Monitoring in Brazil,” *Global Traceability & Finance Initiative / National Wildlife Federation*, November 2023. [https://gtfi.org.br/gtfti\\_site2020/wp-content/uploads/2023/11/Cattle-Traceability-and-Monitoring-in-Brazil-Nov27-NWF-2023-1.pdf](https://gtfi.org.br/gtfti_site2020/wp-content/uploads/2023/11/Cattle-Traceability-and-Monitoring-in-Brazil-Nov27-NWF-2023-1.pdf); Amnesty International. “Brazil: Cattle Illegally Grazed in the Amazon Found in Supply Chain of Leading Meat-Packer JBS.” *Amnesty International*, July 15, 2020.; Gabay, Aimee. “Brazilian Amazon ‘Cattle Laundering’ Taints JBS & Frigol Supply Chains: Report.” *Mongabay*, June 13, 2024. <https://news.mongabay.com/2024/06/brazilian-amazon-cattle-laundering-taints-jbs-frigol-supply-chains-report/>; Wasley, Andrew, et al. “Brazilian Meat Giant Trucked Cattle from Deforested Amazon Ranch.” *The Bureau of Investigative Journalism*, July 27, 2020. <https://www.thebureauinvestigates.com/stories/2020-07-27/brazilian-meat-giant-jbs-trucked-cattle-from-deforested-amazon-ranch>.

producers.<sup>126</sup> “People pass their cattle from one [farm] to another,” he said, “and when they get to the meatpacking plant, everything is ‘legalized.’”

Brazil possesses a powerful traceability tool that could be used to resolve this problem: the Animal Transit Guide (*Guia de Trânsito Animal*, or GTA). Originally developed to enable rapid government response to bovine disease outbreaks, the GTA system has been credited with Brazil’s successful campaign to eliminate foot-and-mouth disease across the entire national territory.<sup>127</sup> Under this system, all cattle movements—whether between farms or from farms to slaughterhouses—must be registered and authorized by state-level animal health agencies. For each transaction, a GTA document is issued detailing the number, age, and sex of the animals, the origin and destination of the transfer, and the identities of the individuals or companies involved on either end.

Using GTAs, slaughterhouses and tanneries could identify all—or most—of the indirect suppliers within their supply chains.<sup>128</sup> Once identified, they could assess their compliance with the Beef TAC requirements using the same suite of public data tools they use to screen their direct suppliers: the CAR registry, the embargo registry, the Dirty List, and digitalized Indigenous land maps, among others.

Since GTAs record transfers of groups—or batches—of cattle, this form of “batch tracing” generally doesn’t allow buyers to determine which specific animals produced by the indirect suppliers ultimately end up among those sold to them by their direct suppliers. However, it can be sufficient to determine which specific producers are within their supply chain—which, as explained below, is ultimately what is necessary for assessing the supply chain’s sustainability, and the company’s compliance with their legally binding commitments.

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<sup>126</sup> Hofmeister, Naira, et al, “JBS Is Likely to Fail to Deliver on Its Amazon Deforestation Promise, Ranchers Say.” *Unearthed (Greenpeace)*, April 17, 2025. <https://unearthed.greenpeace.org/2025/04/17/jbs-amazon-deforestation-pledge-ranchers/>.

<sup>127</sup> In May 2025, Brazil was officially recognized as free of foot-and-mouth disease without vaccination by the World Organization for Animal Health (WOAH). Mano, Ana. “Brazil Declared Free of Foot-and-Mouth Disease Without Vaccination, Says Abrafrigo.” *Reuters*, May 29, 2025. <https://www.reuters.com/business/healthcare-pharmaceuticals/brazil-declared-free-foot-and-mouth-disease-without-vaccination-says-abrafrigo-2025-05-29/>; and Climate Rights International interview with senior official at the Ministry of Agriculture, Livestock and Food Supply (MAPA), May 2025.

<sup>128</sup> The use of GTA records to map all indirect suppliers would be limited by cases where cattle transfers go unreported—or reported inaccurately—which is an ongoing problem, especially in more remote regions.



But there's a catch: GTA records are not readily available to anyone other than the parties to the specific transactions they record. While some environmental and human rights advocates have made a compelling case that they should be made public by the government, most officials and experts consulted by Climate Rights International insisted that is unlikely to change anytime soon. As a result, meatpackers seeking to map their supply chains must rely on the voluntary cooperation of their direct suppliers—and of those suppliers' own suppliers, and so on up the chain to the properties where the animals were bred. According to every Brazilian expert and official consulted, this cooperation has so far failed to materialize.

### *Empty Promises*



Frigol operates meatpacking facilities, including slaughterhouses, in Brazil. Credit: Fernando Martinho for CRI.



Major slaughterhouses have been pledging to address the indirect supplier problem since at least 2009, when they committed under the G4 agreements to ensure that, by 2011, none of their indirect suppliers would be engaged in illegal deforestation.<sup>129</sup> Yet, more than 15 years later, this commitment remains unmet.

Several meatpackers have attempted to improve their monitoring of indirect suppliers—including by using an innovative third-party program called Visipec, which uses the batch tracing formula of cross-referencing public data with GTA records to detect and alert companies to the presence of non-compliant producers within their supply chains.<sup>130</sup> Unlike the companies, Visipec has been able to obtain GTA data in bulk, thereby avoiding reliance on the voluntary cooperation of suppliers for this information. Yet its coverage is limited to only a few states, and it has had considerable difficulty keeping its GTA records from these states up to date.<sup>131</sup> Moreover, the program only monitors transactions between slaughterhouses' direct suppliers and the first tier of indirect suppliers and thus does not cover the multiple upstream stages where cattle often spend the bulk of their lives.<sup>132</sup>

An industry survey conducted in 2023 by Radar Verde, an NGO consortium in Brazil, found that "there is still no control over indirect suppliers that sell calves and steers for fattening to direct suppliers."<sup>133</sup> A follow-up study published in 2024 found that none of 132 companies surveyed could verify that they had not bought cattle raised on illegally deforested land.<sup>134</sup> "The challenge of tracking indirect farms—where the cattle spend most of their lives—remains. No company has proven complete

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<sup>129</sup> Greenpeace Brasil, *Cr terios m nimos para opera  es com gado e produtos bovinos em escala industrial no Bioma Amaz nia*. S o Paulo: Greenpeace Brasil, 2009. <https://storage.googleapis.com/planet4-brasil-stateless/2018/07/criterios-m-nimos-para-opera-2.pdf>.

<sup>130</sup> National Wildlife Federation (NWF) and Amigos da Terra – Amaz nia Brasileira (AVP), "VISIPEC: Visualizing Cattle Supply Chains in Brazil to Enhance Traceability and Strengthen Environmental and Social Governance (1-Pager)." *NWF and AVP*, February 2023. <https://api.visipec.com/NWF-Visipec-1pager-ENG.pdf>.

<sup>131</sup> Visipec, *Frequently Asked Questions*. February 2020. [https://www.visipec.com/wp-content/uploads/2020/02/Frequently\\_Asked\\_Questions.pdf](https://www.visipec.com/wp-content/uploads/2020/02/Frequently_Asked_Questions.pdf).

<sup>132</sup> National Wildlife Federation (NWF) and Amigos da Terra – Amaz nia Brasileira (AVP), "VISIPEC: Visualizing Cattle Supply Chains in Brazil to Enhance Traceability and Strengthen Environmental and Social Governance (1-Pager)." *NWF and AVP*, February 2023. <https://api.visipec.com/NWF-Visipec-1pager-ENG.pdf>.

<sup>133</sup> Radar Verde. "Final Report 2023 (English Version)." *Radar Verde*, November 2023.

[https://radarverde.org.br/wp-content/uploads/2023/11/00\\_RV-Relatorio-final-2023-ENGLISH\\_VERSION.pdf](https://radarverde.org.br/wp-content/uploads/2023/11/00_RV-Relatorio-final-2023-ENGLISH_VERSION.pdf).

<sup>134</sup> Radar Verde, "Resultados Realiza  o Frigor ficos 2024." *Radar Verde*, February 2025. <https://radarverde.org.br/wp-content/uploads/2025/02/Relatorio-Radar-Verde-27-02.pdf>.

traceability on these properties," concluded Imazon, one of the NGOs involved in the study.<sup>135</sup>

Major meatpackers have themselves recognized this failure. "We emphasize that monitoring indirect suppliers is the biggest challenge facing the entire sector," Minerva observes in its environmental sustainability statement online.<sup>136</sup> Similarly, Marfrig's sustainability director called indirect suppliers "one of the greatest challenges of the cattle supply chain."<sup>137</sup> According to its 2024 sustainability report, the company is able to monitor 100 percent of direct suppliers but only 81 percent of its indirect suppliers—meaning nearly a fifth go unmonitored.<sup>138</sup> Similarly, JBS reported monitoring and ensuring compliance with their sourcing policies of direct and indirect suppliers for only 72 percent of cattle sourced in the Amazon region.<sup>139</sup> Minerva reported that it is able to trace and monitor indirect suppliers for 55 percent of its slaughtered cattle in the Amazon.<sup>140</sup> For Frigorífico Rio Maria, this figure is 15 percent.<sup>141</sup>

It is unclear how the companies arrived at these figures, especially given the extreme opacity of the country's cattle supply chains and the fact that typically for every direct supplier there are multiple indirect suppliers who have participated in the production of the animals sold to a slaughterhouse.<sup>142</sup> (The findings of the 2024 Radar Verde study suggest that the actual percentage of indirect suppliers traced and monitored is far lower than these self-reported estimates.<sup>143</sup>) But even

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<sup>135</sup> Imazon, "Meatpackers Marfrig, Minerva and Rio Maria Lead the Way in Controlling the Amazon Deforestation Chain." *Imazon*, April 2024. <https://imazon.org.br/en/imprensa/meatpackers-marfrig-minerva-and-rio-maria-lead-the-way-in-controlling-the-amazon-deforestation-chain/?locale=en>.

<sup>136</sup> Minerva Foods S.A., "Dedication to the Planet," *Minerva Foods*, accessed September 16, 2025. <https://minervafoods.com/en/dedication-to-the-planet/>.

<sup>137</sup> Exame, "The technologies behind Marfrig's origin control – and how this impacts consumers," *Exame Solutions*, March 29, 2023. <https://exame.com/negocios/as-tecnologias-por-tras-do-controle-de-origem-da-marfrig-e-como-isso-impacta-o-consumidor/>.

<sup>138</sup> Marfrig, *2024 Integrated Report* (2024), p. 18, <https://api.mziq.com/mzfilemanager/v2/d/b8180300-b881-4e6c-b970-12ad72a86ec8/cbcd4fad-2236-c6d4-ec44-d76cb0990298?origin=2>.

<sup>139</sup> JBS S.A., *SARB 26 Deforestation Risk Management in the Cattle Supply Chain* (2025), <https://www.jbs.com.br/wp-content/uploads/2025/03/SARB-Indicadores-JBS-24-25.pdf>.

<sup>140</sup> Minerva Foods, *Relatório SARB 026/2023 – 2024 Base Year* (March 2025), [https://minervafoods.com/wp-content/uploads/2025/03/2024\\_SARB026-Minerva-Foods.pdf](https://minervafoods.com/wp-content/uploads/2025/03/2024_SARB026-Minerva-Foods.pdf).

<sup>141</sup> Frigorífico Rio Maria, *SARB26 – Atendimento ao Protocolo SARB 026/2023 da FEBRABAN* (2025), <https://frigorificoriomaria.com.br/sarb26/>.

<sup>142</sup> Climate Rights International interview with Mauro Armelin, director of the NGO Amigos da Terra Amazônia Brasileira and a leading expert on the cattle sector, March 28, 2025.

<sup>143</sup> The Radar Verde report concluded that on a scale of 1-100, Marfrig's "degree of control" over direct suppliers was 96.8 but over indirect suppliers was only 3.2; JBS control over direct suppliers was 89.04 and indirect

according to the companies' own figures, the number of suppliers that are going unmonitored is quite substantial. For example, Marfrig reports having 30,000 direct suppliers and up to 90,000 indirect suppliers—which means that, even assuming its claim to monitor 81 percent of indirect suppliers is accurate, the company is failing to monitor around 17,000 indirect suppliers.<sup>144</sup>

In recent years, responding to mounting pressure, major slaughterhouses have renewed their promises to improve their monitoring of indirect suppliers. In 2020, JBS announced plans to use blockchain technology to achieve better results.<sup>145</sup> In 2021 the company vowed it would stop buying cattle raised on illegally deforested land in the Amazon by the end of 2025 as part of a Net Zero pledge.<sup>146</sup> The following year, at COP27, JBS expanded this deforestation commitment to include cattle raised on any land cleared after 2008, even where the deforestation was legal.<sup>147</sup> In 2023 testimony to a U.S. Senate finance committee, JBS's global chief sustainability officer reiterated the pledge to eliminate both legal and illegal deforestation by 2025.<sup>148</sup>

Similarly, Marfrig has set a 2025 deadline to eliminate illegal deforestation from all levels of its Amazon operations, and says it is working to ensure that by 2025, “100 percent of its cattle supply chain in the Amazon, Cerrado, and other regions of Brazil, including both direct and indirect suppliers, will be deforestation-free.”<sup>149</sup>

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suppliers 2.2; Minerva's control over direct suppliers was 94.4 and indirect suppliers 3.2, and Frigorífico Rio Maria's control over direct suppliers was 92.2 and over indirect suppliers was 3.2. See Radar Verde. “Resultados Realização Frigoríficos 2024.” *Radar Verde*, February 2025. <https://radarverde.org.br/wp-content/uploads/2025/02/Relatorio-Radar-Verde-27-02.pdf>.

<sup>144</sup> Marfrig Global Foods SA. *Annual Report – AndGreen Fund Portfolio*. Accessed September 27, 2025. <https://annual-report.andgreen.fund/portfolio/marfrig-global-foods-sa/>.

<sup>145</sup> JBS, “JBS Announces ‘Together for the Amazon’ Program.” *JBS*, October 19, 2020. <https://mediaroom.jbs.com.br/noticia/jbs-announces-together-for-the-amazon-program>.

<sup>146</sup> JBS, “JBS Makes Global Commitment to Achieve Net-Zero Greenhouse Gas Emissions by 2040.” *JBS*, March 23, 2021, accessed September 17, 2025. <https://jbsfoodsgroup.com/articles/jbs-makes-global-commitment-to-achieve-net-zero-greenhouse-gas-emissions-by-2040>.

<sup>147</sup> JBS, “JBS Brings Forward Zero Deforestation Targets as It Ramps Up Action Towards 1.5°C Pathway.” *JBS*, December 5, 2022, accessed September 17, 2025. <https://mediaroom.jbs.com.br/noticia/jbs-brings-forward-zero-deforestation-targets-as-it-ramps-up-action-towards-15-degrees-c-pathway>.

<sup>148</sup> Weller, Jason, “Cattle Supply Chains and Deforestation of the Amazon: Statement of Jason Weller.” Testimony before the United States Senate Committee on Finance, June 22, 2023. [https://www.finance.senate.gov/imo/media/doc/06222023\\_weller\\_testimony.pdf](https://www.finance.senate.gov/imo/media/doc/06222023_weller_testimony.pdf).

<sup>149</sup> European Market Magazine, “How Marfrig Is Working To Ensure A 100% Sustainable, Traceable, Deforestation-Free Supply Chain,” *ESM Magazine*, October 16, 2024. <https://www.esmmagazine.com/supply-chain/how-marfrig-is-working-to-ensure-a-100-sustainable-traceable-deforestation-free-supply-chain-272819>.

Yet none of these companies have offered a credible explanation for how a voluntary system—one that would require thousands of indirect suppliers to share their GTA records—could function when, according to virtually every expert and official interviewed by Climate Rights International, they struggle even to obtain complete documentation from their direct suppliers. “What makes JBS believe that producers are providing the full list of their indirect suppliers? Ranchers will not report problems that could take them out of the market,” one expert said.<sup>150</sup>

Repórter Brasil, Greenpeace, and *The Guardian* found a broad consensus among the dozens of ranchers they interviewed in 2025—including some direct suppliers of JBS—that the company’s latest pledge to map all its full supply chains was entirely unrealistic.<sup>151</sup> The director of a ranchers’ association in Pará called it “humanly impossible” for JBS to secure full participation from its suppliers. Other ranchers dismissed the company’s current supply chain commitments as mere “window dressing.”<sup>152</sup>

And indeed, even the companies themselves have, at times, acknowledged that the unilateral efforts they’re proposing are not in fact sufficient to address the problem. In 2019, Minerva acknowledged that monitoring indirect suppliers is “very challenging” and that a monitoring system that relies on requesting information from suppliers would be “ineffective” and “impossible to audit.”<sup>153</sup> “For it to be done,” the company said, referring to the monitoring of indirect suppliers, “government intervention is required.” In a 2023 statement, Minerva emphasized that “efforts are being made to track the supply chain at all levels, however, it is important to recognize that achieving full traceability goes beyond industry initiatives, requiring the participation of other stakeholders including government, ranchers, retailers, the community, and others.”<sup>154</sup>

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<sup>150</sup> Climate Rights International interview with Ritaumaria Pereira, Executive Director, Imazon, April 2025.

<sup>151</sup> Hofmeister, Naira, et al, “JBS Is Likely to Fail to Deliver on Its Amazon Deforestation Promise, Ranchers Say.” *Unearthed (Greenpeace)*, April 17, 2025. <https://unearthed.greenpeace.org/2025/04/17/jbs-amazon-deforestation-pledge-ranchers/>.

<sup>152</sup> Ibid.

<sup>153</sup> Minerva Foods, “Statement from Minerva: Response to Global Witness.” *Minerva Foods*, accessed September 12, 2025. [https://www.banktrack.org/download/minerva\\_response\\_to\\_global\\_witness/statement\\_from\\_minerva\\_1.pdf#:~:text=sustainability%20on%20the%20Brazilian%20cattle,and%20labor%20compliance%2C%20as%20follows.](https://www.banktrack.org/download/minerva_response_to_global_witness/statement_from_minerva_1.pdf#:~:text=sustainability%20on%20the%20Brazilian%20cattle,and%20labor%20compliance%2C%20as%20follows.)

<sup>154</sup> Mighty Earth, “Rapid Response #1 [Cattle]: Monitoring Deforestation in Brazilian Supply Chains.” *Mighty Earth*, December 8, 2023. <https://mightyearth.org/wp->

JBS has also acknowledged the complexity of tracking all upstream ranches, calling it "impossible to trace all its indirect suppliers."<sup>155</sup> In 2020, the company stated: "We will only meet this collective challenge... through collaboration and action."<sup>156</sup> In a 2025 statement, JBS noted that "the challenges... are significant" when it comes to addressing illegal deforestation across the vast network of cattle farms, describing it as a problem "larger than any one company can solve on its own."<sup>157</sup> Previously, in a public forum at New York Climate Week in 2023, JBS CEO Gilberto Tomasoni told the New York Times: "The only solution for this deforestation in Brazil is to have a national mandatory traceability system."<sup>158</sup>

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[content/uploads/2023/12/RR\\_Report1\\_VF\\_Mighty\\_8DEC2023.pdf#:~:text=traceability%20tool%20for%20mappi ng%20indirect.](#)

<sup>155</sup> Global Witness, "One Football Field of Tropical Forest a Day Destroyed by Farms Supplying JBS," Global Witness, August 22, 2024, <https://globalwitness.org/en/campaigns/forests/one-football-field-of-tropical-forest-a-day-destroyed-by-farms-supplying-jbs/>.

<sup>156</sup> Phillips, Dom, "Meat Company Faces Heat Over 'Cattle Laundering' in Amazon Supply Chain." *The Guardian*, February 20, 2020. <https://www.theguardian.com/environment/2020/feb/20/meat-company-faces-heat-over-cattle-laundering-in-amazon-supply-chain#:~:text=%E2%80%9CJBS%20is%20committed%20to%20eradicating.%E2%80%9D>.

<sup>157</sup> Watts, Jonathan, et al, "Revealed: World's Largest Meat Company May Break Amazon Deforestation Pledges Again." *The Guardian*, April 17, 2025. <https://www.theguardian.com/environment/2025/apr/17/revealed-worlds-largest-meat-company-jbs-may-break-amazon-deforestation-pledges-again#:~:text=JBS%20told%20the%20Guardian%3A%20%E2%80%9CThe,development%20of%20the%20Amazon%20biome>.

<sup>158</sup> Polansek, Tom, "JBS Says Brazil Needs Mandatory Cattle Tracking to Stop Deforestation." *Reuters*, September 21, 2023. <https://www.reuters.com/sustainability/jbs-says-brazil-needs-mandatory-cattle-tracking-stop-deforestation-2023-09-21/>. See also: Henderson, Bruce. "Grilling the World's Biggest Meat Producer." *The New York Times*, September 28, 2023. <https://www.nytimes.com/2023/09/28/climate/grilling-the-worlds-biggest-meat-producer.html>.



## V. Illustrative Cases

Repórter Brasil and Climate Rights International documented ten recent cases in which the supply chains of major Brazilian meatpackers contained suppliers implicated in illegal deforestation, labor abuses, and/or invasions of Indigenous lands.<sup>159</sup> These meatpackers supplied hides to tanneries—either their own facilities or those of other companies—that exported leather to international markets. The leather exporters include **Durlicouros, JBS, Marfrig, Mastrotto, Minerva, and Viposa.**

These ten cases illustrate some of the ways in which cattle producers that are involved in illegal deforestation or labor abuses can end up in the supply chains of slaughterhouses, tanneries, and exporters.<sup>160</sup> In several cases, they were direct suppliers to these slaughterhouses. In most of these cases, the cattle producers were indirect suppliers of major slaughterhouses that supply tanneries that export leather. In others, there is evidence indicating they may have been laundering their cattle by using third parties, including family members, as intermediaries to market their cattle to the slaughterhouse. The ten cases are discussed in greater detail in the new report by Repórter Brasil, which includes responses from ranchers and slaughterhouses contacted by the authors.<sup>161</sup>

The supply chain links, which rely on batch tracing through GTAs, do not prove that cattle from a particular ranch actually reached a particular slaughterhouse. They do, however, demonstrate that these meatpackers' supply chains include producers implicated in serious environmental and/or human rights harms.

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<sup>159</sup> Unless otherwise indicated, the information regarding cattle transactions is based on Animal Transit Guides (Guias de Trânsito Animal, GTAs) and other types of cattle transit data obtained by Repórter Brasil and presented in its report: Repórter Brasil, *Under the Radar: How Cattle Ranchers Caught Employing Slave Labour Are Part of the Supply Chains of Brazil's Largest Meatpacking Companies* (October 9, 2025), <https://reporterbrasil.org.br>.

<sup>160</sup> The supply chain connections among farms—and between farms and slaughterhouses—were documented by Repórter Brasil using information regarding each cattle transaction, including GTAs (INSERT RB REPORT) . The connections between the slaughterhouses and tanneries relied on a range of public documents cited in each case.

<sup>161</sup> Repórter Brasil, *Under the Radar: How Cattle Ranchers Caught Employing Slave Labour Are Part of the Supply Chains of Brazil's Largest Meatpacking Companies* (October 9, 2025), <https://reporterbrasil.org.br>.

These ten illustrative cases are not isolated instances. A review by Climate Rights International of more than 40 publications by civil society organizations and journalists found more than 340 reported cases over the past decade connecting the supply chains of major Brazilian exporters of beef and leather to cattle producers implicated in illegal deforestation and/or human rights abuses. (See Appendix A for a list of these reports).

Moreover, interviews conducted by Climate Rights International with dozens of Brazilian experts—including senior government officials, cattle industry representatives, civil society leaders, and academics—confirmed that the cases reflect a systematic failure of the Brazil's cattle sector, and of international buyers of its exports, to ensure that supply chains are free from illegal deforestation and abuse.

### Forced Labor and Other Conditions Analogous to Slavery

Eight of the ten cases we document involve cattle ranchers who have been—or still are—on the Dirty List. The descriptions of the abusive conditions included here are summaries of the evidence documented by federal labor inspectors in official reports that concluded the workers had been subjected to conditions analogous to slavery, as defined under Brazilian law.

Several cases contain evidence indicating that workers were likely victims of forced labor, including factual findings by the labor inspectors that show that they were unable to leave the property where they were subject to abusive conditions due to geographic isolation, debt bondage, or fear of violence—all forms of coercion. Other cases do not include such evidence, which is not required under Brazilian law to establish a violation of the prohibition on subjecting workers to conditions analogous to slavery. However, as discussed in Chapter II, when it comes to the possibility of coercion in such cases, the absence of evidence should not be interpreted as evidence of absence: it is possible that other cases also involved coercion but that the inspectors were unable to document it. Labor inspectors are typically able to document only the objective conditions of degradation that they are able to witness themselves, since workers who may be scared or even traumatized are often reluctant to report threats or acts of intimidation they may have suffered.

It is largely due to this fear-induced reticence that the ILO has identified abusive working and living conditions as a warning sign of coercion and thus possible forced labor. It is a key reason Brazilian law criminalizes subjecting workers to “conditions analogous to slavery,” including exhaustive hours and degrading conditions, even without evidence of restrictions on freedom.

The case descriptions below identify transactions that were made by the employers after their workers had been rescued by labor inspectors, including, in most cases, transactions that occurred once the ranchers were subsequently placed on the Dirty List. This listing usually occurs at least two years after the workers are rescued—sometimes more—as the labor inspectors’ findings must first be reviewed in an administrative process that affords the employers their right to defend themselves against charges of wrongdoing.

When a company in the Brazilian cattle sector fails to rid its supply chains of ranchers on the Dirty List, not only does it violate its commitments under the Beef TAC, it also undermines the effectiveness of the list as a deterrent and reinforces the economic dynamic incentivizing the use of forced labor and other severe forms of labor exploitation.

At the same time, while avoiding suppliers on the Dirty List is a critical step companies should take, it is not, in itself, sufficient to ensure their supply chains are free of forced labor. The Dirty List is a critical tool for facilitating buyers’ due diligence—but not a substitute for it. Given the substantial lag time between when workers are rescued and when an employer is actually listed, many transactions of cattle—including some documented in these cases—occur before the Dirty List can be used to detect the link to labor abuses. Slaughterhouses—especially those in regions with a high prevalence of forced labor cases on the Dirty List—should therefore undertake additional due diligence measures to monitor and investigate reports of forced labor or rescues. And where there is substantial evidence of likely abuse, they should avoid transactions with the offending properties and the properties that they supply.

Our review of recent reporting by civil society organizations and journalists identified more than 50 additional reported cases over the past decade connecting the supply

chains of major Brazilian exporters of beef and leather to cattle producers implicated in forced labor or other severe forms of labor exploitation.<sup>162</sup>

## Indigenous Land Invasions

Two of the cases we document involve invasions of the Krikati Indigenous Territory in Maranhão state. In both cases, cattle ranchers whose farms overlapped illegally with the Krikati Indigenous Territory—and who had recently been ordered by police to remove cattle from the territory—have been indirect suppliers of major slaughterhouses.

Brazilian law prohibits commercial cattle ranching by non-Indigenous individuals within officially recognized Indigenous territories—a prohibition, rooted in Indigenous peoples' rights over their traditional lands. When companies fail to rid supply chains of ranchers who are illegally raising cattle in Indigenous territory—even when the transaction is reported as coming from a farm elsewhere—they are effectively contributing to a business operation that is violating the law by invading Indigenous lands.

Our review of recent reports by civil society organizations and journalists identified more than 50 additional reported cases over the past decade connecting the supply chains of major Brazilian exporters of beef and leather to cattle producers implicated in Indigenous land invasions.<sup>163</sup>

## Deforestation

Four of the cases we document have clear links to illegal deforestation. One (case #1) involves a property—from which workers were rescued from conditions analogous to slavery—that was under embargo for illegal deforestation. A second (case #5) involves an employer placed on the Dirty List who owned other properties that were under embargo for illegal deforestation.

Brazilian law makes it illegal to source cattle from farms under environmental embargo. While this prohibition applies only to cattle on the specific property that

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<sup>162</sup> See Appendix A for a list of these reports.

<sup>163</sup> See Appendix A for a list of these reports.

has been embargoed, when companies fail to rid their supply chains of ranchers that have additional properties under embargo, there is a significant risk that the cattle being sourced has actually originated in the embargoed area and is being laundered through the ranchers’ non-embargoed properties. And even in the absence of such laundering—when the cattle purchased has come from non-embargoed farms—the companies are effectively contributing to a business operation that has engaged in illegal deforestation.

The other two cases with evident links to deforestation are those involving ranchers illegally raising cattle in the Krikati Indigenous Territory (#3 and #6). As discussed in Chapter III, the legal prohibition on non-Indigenous people engaging in commercial ranching within Indigenous territories is widely understood as being critical for deterring cattle-driven deforestation on these lands. And, indeed, according to the Federal Prosecutors Office, more than 13 square kilometers of Krikati land have been illegally deforested by outside ranchers who have defied a 2017 federal court order to halt their agricultural activities within the territory.

Our review of recent reports by civil society organizations and journalists identified more than 280 additional reported cases over the past decade connecting the supply chains of major Brazilian exporters of beef and leather to cattle producers implicated in illegal deforestation.<sup>164</sup>

*Case #1 (São Félix do Xingu, Pará)*

HARMS:	Forced labor, illegal deforestation
TANNERIES:	JBS, Durlicouros

Forced Labor

In June 2021, federal labor inspectors rescued five workers, including a 15-year-old boy, from *Delta do Triunfo* farm in São Félix do Xingu, Pará. The inspectors had traveled 200 kilometers on unpaved roads and then walked seven kilometers

<sup>164</sup> See Appendix A for a list of these reports.



through dense forest to reach the makeshift camp housing workers “set up in an area in the middle of the Amazon rainforest.”<sup>165</sup>

According to the inspectors’ report, the only shelter for the workers was crude plastic tarps strung up between trees without any kind of protection from the wind, cold, and rain as well as wildlife, such as jaguars, scorpions, snakes and mosquitoes. Their only source of water to drink and bathe in was a visibly dirty stream also used by cattle and wild animals.<sup>166</sup> The only food accessible to them was rice and beans warmed on a stove made from a diesel can. The workers performed dangerous tasks using chainsaws without being provided legally required protective equipment or safety training. According to at least one worker’s testimony, chainsaw accidents had been common.<sup>167</sup> The workers had no means of communicating with the outside world and no way to leave the property other than being driven by their employer’s vehicles.

According to the 1,200-page labor inspector case file, during the rescue one of the labor prosecutors directly witnessed the owner, Celio dos Reis Campos de Amaral, harassing workers during interviews and had to officially warn him about his conduct. Multiple workers requested anonymity due to fear of retaliation and threats from the employer.<sup>168</sup>

The owner, dos Reis Campos de Amaral, was added to the Dirty List in October 2023. The listing identifies *Delta do Triunfo* as the property where the abuses took place.

## Illegal Deforestation

Since 2010, IBAMA has repeatedly found illegal deforestation on lands that are located within the perimeters of *Delta do Triunfo*—including most recently in

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<sup>165</sup> Brazil, Ministério do Trabalho e Previdência, “Relatório de Fiscalização: Celio dos Reis Campos de Amaral (Fazenda Delta do Triunfo),” inspection report, São Félix do Xingu, PA, June 24, 2021-May 6, 2022, p. 15.

<sup>166</sup> Ibid, p. 86.

<sup>167</sup> Ibid, p. 151.

<sup>168</sup> Ibid, p.153.

2023—placing embargoes on these areas that currently total approximately 800 hectares.<sup>169</sup>

## Supply Chains

The *Delta do Triunfo* farm, while under embargo for illegal deforestation, has been an indirect supplier of **Frigol**, **Frigorífico Rio Maria**, and **JBS**. Both Frigol and Frigorífico Rio Maria are suppliers of **Durlicouros**.<sup>170</sup>

- *Delta do Triunfo* transferred cattle to two farms—*Sítio Rancho Fundo* and *Maria Paula*—in June 2021, the same month as the workers’ rescue.
  - *Sítio Rancho Fundo* supplied **JBS** in August and September 2021.
  - *Maria Paula* supplied animals to **Frigorífico Rio Maria** in 2021 and 2022, and **Frigol** in 2021, 2022, and 2023.
  - *Maria Paula* also supplied **JBS** in 2024, after dos Reis Campos de Amaral, the owner of Delta do Triunfo, was placed on the Dirty List.
- *Delta do Triunfo* supplied four additional farms between June 2021 and November 2022. The four additional farms supplied **Frigol** in 2021, 2022 and 2023.

## Case #2 (Ourilândia do Norte, Pará)

HARMS:	Forced labor	
TANNERIES:	Durlicouros, JBS	

## Forced Labor

In July 2022, federal labor inspectors rescued two workers from *Presente de Deus*, a remote farm almost 70 kilometers from the nearest town in Ourilândia do Norte, Pará.

<sup>169</sup> Brazil, Ministry of Environment (MMA) and Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), “Report of Embargoed Areas.” *IBAMA*, accessed July 1, 2025. Available at: <https://servicos.ibama.gov.br/ctf/publico/areaseembargadas/ConsultaPublicaAreasEmbargadas.php>.

<sup>170</sup> Frigol Oficial [@frigoloficial], “Frigol é fornecedor da Durlicouros,” *Instagram*, January 30, 2024. <https://www.instagram.com/frigoloficial/reel/C3abx0vst38/>; and Durlicouros, “Projeto de rastreabilidade une Frigorífico Rio Maria e Durlicouros,” 2023, <https://durlicouros.com.br/projeto-de-rastreabilidade-une-frigorifico-rio-maria-e-durlicouros/>.

According to the inspectors' report, the workers had been living in an unfinished building with dirt floors, no furniture, no privacy, and no windows or doors to protect them from animals, pests, and inclement weather.

They had been provided food by their employer, but lack of refrigeration and proper storage—as well as unsanitary preparation methods—meant the food had often been unsafe to eat due to spoilage and contamination risks. There were no toilets, forcing workers to relieve themselves in the brush—exposing them to venomous animals and health risks from human waste contamination.<sup>171</sup> For bathing and storing water the workers had been using repurposed pesticide containers clearly labeled "DO NOT REUSE THIS PACKAGE." Their work entailed applying toxic pesticides, known colloquially in Portuguese as "Mata-tudo" ("Kills-everything"), without safety training or protective equipment.<sup>172</sup> Workers used personal clothes and there was no specific location for bathing with water and soap after applying pesticides: a fundamental safety requirement to avoid cross-contamination.<sup>173</sup>

The owner of the farm, Vanúbia Silva Rodrigues, was placed on the Dirty List in October 2023.

## Supply Chains

The *Presente de Deus* farm has been an indirect supplier of **Rio Maria** and **Durlicouros**, and both a direct and indirect supplier of **JBS**:

- The farm sold cattle directly to **JBS** in April 2023, after the workers were rescued. JBS announced it would stop sourcing from the farm after the owner was placed on the Dirty List in October 2023.<sup>174</sup>
- In December 2023, after the owner was placed on the Dirty List, the farm transferred 144 animals to a second farm—*Pé de Morro*—which sold the

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<sup>171</sup> Brazil, Ministério do Trabalho e Previdência, "Relatório de Fiscalização: Vanúbia Silva Rodrigues (Fazenda Bela Vista Presente de Deus)," inspection report, Ourilândia do Norte, PA, July 26-August 5, 2022. Pages 9-20.

<sup>172</sup> Ibid, p. 23.

<sup>173</sup> Ibid, pp. 20-25.

<sup>174</sup> Repórter Brasil, "Nova 'Lista Suja' do Trabalho Escravo traz 5 fornecedores da JBS e 13 garimpos," *Repórter Brasil*, October 6, 2023. <https://reporterbrasil.org.br/2023/10/nova-lista-suja-do-trabalho-escravo-traz-5-fornecedores-da-jbs-e-13-garimpos/>.

identical number, 144, with matching sex and age characteristics, to **JBS**, according to cattle transit permits issued five days later.<sup>175</sup>

- In April 2024, the farm transferred 300 head of cattle to a third farm—*Maranata*—which issued documents to transfer 54 head of cattle with the matching sex and age characteristics to **JBS** the same day.<sup>176</sup>
- Between April and June 2024, the third farm sold dozens more head of cattle to **JBS**, as well as to **Frigorífico Rio Maria**, a supplier of **Durlicouros**.<sup>177</sup>

### *Case #3 (Montes Altos, Maranhão)*

HARMS:	Indigenous land invasion, deforestation
TANNERIES:	JBS, Durlicouros

#### Indigenous Land Invasion

In June 2024, while conducting an operation to crack down on environmental crime, the Maranhão State Environmental Police Battalion found 120 head of cattle being raised on a farm called *São Gregório* located illegally within the Krikati Indigenous Territory and owned/operated by an outside rancher. The rancher was ordered to remove the animals from the territory within 15 days.<sup>178</sup>

#### Illegal Deforestation

The rancher is one of hundreds who have raised cattle in Krikati lands in recent years. The increase in environmental crime has resulted in the clearing of at least 1300 hectares of forest in the Krikati Indigenous Territory since 2017, according to

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<sup>175</sup> Agropecuarian Defense Agency of the State of Pará [Agência de Defesa Agropecuária do Estado do Pará], "Cattle transit data analysis," Google Looker Studio dashboard, accessed February 2025. <https://lookerstudio.google.com/u/0/reporting/69ee14b8-baa2-4af0-bd80-c1b4fb2e66d2/page/67tZE>.

<sup>176</sup> Ibid.

<sup>177</sup> Durlicouros, "Projeto de rastreabilidade une frigorífico Rio Maria e Durlicouros." *Durlicouros*, accessed July 15, 2025. <https://durlicouros.com.br/projeto-de-rastreabilidade-une-frigorifico-rio-maria-e-durlicouros/>.

<sup>178</sup> State Secretariat of Public Security of Maranhão, Environmental Police Battalion, Environmental Inspection Section (Secretaria de Estado da Segurança Pública do Maranhão, Batalhão de Polícia Ambiental, Seção de Fiscalização Ambiental), "Official Letter No. 63/2024 – FISC AMB/BPA" ("Ofício nº 63/2024 – FISC AMB/BPA"), July 4, 2024.

the Federal Prosecutor's Office.<sup>179</sup> Today, cattle ranching remains the primary driver of deforestation in the territory, according to the testimony of community leaders and civil society experts, corroborated by a field visit by Climate Rights International.<sup>180</sup>

## Supply Chains

The rancher whose property is located within Krikati Indigenous Territory has been an indirect supplier of **JBS** and **Masterboi**, Masterboi is a supplier of **Durlicouros**.<sup>181</sup>

- In August 2024, two months after the police operation, the rancher sold 25 head of cattle to a nearby farm—*Conquista*—belonging to another rancher. In the GTA for the transaction, the rancher reported the cattle as originating from a property with a different name than that of the farm inside the Krikati territory. However, in a court filing in 2024 seeking to challenge the removal order, he stated that he had "no other place to raise his animals" other than the farm inside the territory.<sup>182</sup>
- In the same month, this second farm supplied 27 head of cattle with matching sex and age characteristics to **JBS**.
- In October 2024, the second farm supplied 30 head of cattle with matching sex and age characteristics to **Masterboi**.

## Case #4 (Araguaína, Tocantins)

HARMS:	Forced labor
TANNERIES:	Durlicouros

<sup>179</sup> Ministério Público Federal, "Manifestação no processo nº 0005601-78.2017.4.01.3701 (Ação Civil Pública), PRM-Imperatriz-MA, Gabinete do 2º Ofício" (*Submission in Case No. 0005601-78.2017.4.01.3701 [Public Civil Action], PRM-Imperatriz-MA, 2nd Office*). Ministério Público Federal, 2022, accessed July 16, 2025.

<sup>180</sup> Ibid.; Climate Rights International Interview with Maurício Krikati, Aldeia São José, Maranhão, May 10, 2025; Climate Rights International interview with Edilena Krikati, Imperatriz, MA, May 12, 2025; Climate Rights International interview with Gilderlan Rodrigues da Silva, CIMI, Imperatriz, Maranhão, May 9<sup>th</sup>, 2025.

<sup>181</sup> Durlicouros [@durlicouros], "Pernambuco receberá um projeto piloto..." Instagram, April 5 2024. <https://www.instagram.com/durlicouros/reel/C5Y666dvst0/>.

<sup>182</sup> Tribunal de Justiça do Maranhão, *Carreiro, José Jansen Rodrigues v. Secretaria do Estado do Meio Ambiente e Recursos Naturais do Estado do Maranhão (SEMA/MA), Mandado de Segurança Cível No. 0816552-17.2024.8.10.0000*, July 31, 2024, p. 4.



## Forced Labor

In September 2020, federal labor inspectors rescued five workers, including a 15-year-old, from a farm called *Gratão* in Araguaína, Tocantins.<sup>183</sup>

According to the inspectors' report, all workers had been living in a single room serving as bedroom, kitchen, and living area, built with termite-damaged wood, with gaps between boards, no doors or windows, and a deteriorated roof "incapable of protecting workers from the elements."<sup>184</sup> They had slept in hammocks or on poor-quality mattresses without bed linens, with at least one of them sleeping directly on the floor. There was no kitchen, and food was cooked either outdoors or in the same room that everybody slept in.<sup>185</sup> The facility had no sanitary facilities, forcing workers to relieve themselves in surrounding bushes. Drinking water came from a stagnant stream without filtration, was stored in uncovered containers, and served in shared cups.<sup>186</sup>

Workers had been involved in clearing vegetation, applying pesticides, and building fences, and had been performing this labor without protective equipment—including boots, hats, and gloves—despite exposure to hazardous substances and sharp materials. One worker testified that when he had injured his knee while working and had to go to the hospital, the employer deducted the cost of the visit and medication from his wages.<sup>187</sup>

Another worker testified that the workers lived in fear on the farm, stating that they believed "the employer's family is dangerous."<sup>188</sup>

In November 2020, the rancher who owned the *Gratão* farm—named Augusto Gratão—was found liable for subjecting workers to conditions analogous to slavery in a civil suit brought by the Public Labor Ministry.<sup>189</sup> In April 2022, he was placed on the Dirty List. He was removed from the list two years later, in 2024.

## Supply Chains

The rancher on the Dirty List has been an indirect supplier of **Masterboi**. Masterboi is a supplier of **Durlicouros**.<sup>190</sup>

- In December 2023, while on the Dirty List, the rancher transferred cattle from *Gratão* farm to another nearby farm owned by Valdair Gratão, likely the rancher's son.<sup>191</sup>
- In December 2023 and January 2024, the second farm supplied cattle to a slaughterhouse owned by **Masterboi**.
- The fact that the owners of the two farms shared the same last name—and that one worker identified the son by name—should have been ample reason to suspect the two ranchers might be relatives engaged in cattle laundering.

## Case #5 (São Félix do Xingu, Pará)

HARMS:	Forced labor, deforestation
TANNERIES:	JBS

### Forced Labor

In June 2018, federal labor inspectors rescued four workers from two cattle farms—*Pedra Preta* and *Futura*—in São Félix do Xingu, Pará. The men had been recruited by a labor broker and transported to the properties, located more than 150 kilometers from the nearest town, and there subject to living and working conditions that the inspectors found "debase[d] human dignity."<sup>192</sup>

<sup>183</sup> Brazil, Ministério da Economia, "Relatório de Fiscalização: Augusto Gratão (Fazenda Gratão)" (*Inspection Report: Augusto Gratão [Gratão Farm]*). Inspection report, Nova Olinda, TO, September 15–16 and 22–25, 2020.

<sup>184</sup> *Ibid.* p. 46

<sup>185</sup> *Ibid.*

<sup>186</sup> *Ibid.*

<sup>187</sup> *Ibid.* p. 150

<sup>188</sup> *Ibid.* p. 167

<sup>189</sup> Justiça do Trabalho, Tribunal Regional do Trabalho da 10ª Região. "Ação Civil Pública Cível 0000675-53.2020.5.10.0811, Ministério Público do Trabalho v. Augusto Gratão." 1ª Vara do Trabalho de Araguaína – TO, filed November 9, 2020, accessed July 15, 2025.

<sup>190</sup> Durlicouros [@durlicouros], "Pernambuco receberá um projeto piloto..." Instagram, April 5 2024.

<https://www.instagram.com/durlicouros/reel/C5Y666dvst0/>.

<sup>191</sup> One of the workers in his testimony to labor inspectors referred to the Augusto Gratão's son by the name "Valdair." Sistema Nacional de Cadastro Ambiental Rural. "Recibo de inscrição do imóvel rural no CAR: Fazenda Gratão" [Rural Property Registration Receipt]. *CAR Registration No. TO-172109-4A9D.BF8F.FE83.46F9.A683.C533.4B79.0E05*, June 3, 2015.

<sup>192</sup> Brazil, Ministério do Trabalho, Secretaria de Inspeção do Trabalho, Divisão de Fiscalização para Erradicação do Trabalho Escravo, Grupo Especial de Fiscalização Móvel. "Erradicação do Trabalho Escravo: Relatório de

According to the federal labor inspectors' report, the workers had been sleeping in makeshift shelters—some in a tarpaulin shack and others in a deteriorated wooden shed with incomplete flooring raised on stilts. They had no bathrooms.<sup>193</sup> Food was stored in a freezer that had only intermittent access to electricity and was often spoiled, according to workers' testimonies. Despite hazardous working conditions—including chainsaw operation, electrical hazards, and dangerous storage for combustible materials—workers received only basic protective equipment (gloves, glasses, boots) but no safety training, and workplace accidents went unreported.<sup>194</sup>

The workers had no formal contracts and were not paid on a regular basis as required by Brazilian law.<sup>195</sup> They were not provided legally mandated benefits, such as social security contributions. They depended for food on their employer, who deducted the cost from their wages, in violation of Brazilian law. They also depended on their employer for transportation—without which the only way they could leave the remote ranch would have been by foot.

In April 2024, after the administrative review of his case was completed, the rancher Marcos Borges de Araújo, who had employed the abused workers, was put on the Dirty List.<sup>196</sup>

## Illegal Deforestation

Borges de Araújo had leased the two farms from Agropecuária Vale dos Sonhos Ltda., a company controlled by the Araújo family. Both he and Agropecuária Vale dos Sonhos Ltda. own other properties that are under environmental embargo for illegal deforestation. Borges de Araújo has had 100 hectares under embargo since

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Auditoria – Marcos Borges de Araújo (Fazenda Pedra Preta e Fazenda Futura)” (*Eradication of Slave Labor: Audit Report – Marcos Borges de Araújo [Pedra Preta Farm and Futura Farm]*). Inspection report, Santana do Araguaia, PA, June 5–15, 2018, p. 22.

<sup>193</sup> Ibid.

<sup>194</sup> Ibid.

<sup>195</sup> Pages 6–9 of the inspection document lists 28 specific violations for failing to provide required employment registration, work cards (CTPS), and formal contracts. Ibid.

<sup>196</sup> Brazil, Ministry of Labor and Employment. “Register of Employers who have Subjected Workers to Conditions Analogous to Slavery [Cadastro de Empregadores que Tenham Submetido Trabalhadores a Condições Análogas à de Escravo],” April 2024. [https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/cadastro\\_de\\_empregadores.pdf](https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/cadastro_de_empregadores.pdf).

at least 2013, while Agropecuária Vale dos Sonhos Ltda. has had 585 hectares under embargo since 2018.<sup>197</sup>

## Supply Chains

Both the rancher, Borges de Araújo, and the company that owns *Pedra Preta* farm have been direct suppliers of **JBS**.

- Between 2018 and 2023—after his employees were rescued but before he was put on the Dirty List—Borges de Araújo repeatedly transferred cattle from Pedra Preta to three other farms, and then sold cattle to **JBS** from those three farms.<sup>198</sup>
- After Borges de Araújo was put on the Dirty List in April 2024, he appears to have stopped sending animals under his name. However, in May and July, 2024, Agropecuária Vale dos Sonhos Ltda, the company controlled by the Araújo family that owns *Pedra Preta*, sold cattle to **JBS** from that farm.
- All these sales to **JBS** occurred when both rancher and Agropecuária Vale dos Sonhos Ltda. had other properties under embargo for illegal deforestation.

## Case #6 (Lajeado Novo, Maranhão)

HARMS:	Indigenous land invasion, deforestation
TANNERIES:	Durlicouros

## Indigenous Land Invasion

In June 2024, while conducting an operation to crack down on environmental crime, the Maranhão State Environmental Police Battalion found 80 head of cattle being raised illegally on a farm within the Krikati Indigenous Territory by an

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<sup>197</sup> Brazil, Ministério do Meio Ambiente, Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis (IBAMA). “Certidão de Embargo, Certificate No. ZYZ1TEUXMY4VXSPE and JN5BSPLGL7X5VW9F” (*Embargo Certificate*), February 25, 2025.

<sup>198</sup> Repórter Brasil, *Under the Radar: How Cattle Ranchers Caught Employing Slave Labour Are Part of the Supply Chains of Brazil's Largest Meatpacking Companies* (October 9, 2025), <https://reporterbrasil.org.br>.

outside rancher, Raimundinho Gomes Barros.<sup>199</sup> The police ordered the rancher to remove the animals from the territory within 15 days.

Gomes Barros owns multiple properties in the region that are located within a few miles of each other.<sup>200</sup> One was a farm called *Varjãozinho* located directly inside the boundaries of the Krikati Indigenous Territory, where the police found the cattle. A second was a farm called *Traíras*, whose boundaries were officially registered as overlapping with the Indigenous territory until 2022. Later, the rancher amended the registration with new self-reported boundaries that did not include the overlapping area.<sup>201</sup>

## Illegal Deforestation

Gomes Barros is one of hundreds who have illegally raised cattle in Krikati lands in recent years, the increase in environmental crime has resulted in the clearing of more than 1300 hectares of forest in the Krikati Indigenous Territory since 2017, according to the Federal Prosecutor's Office.<sup>202</sup> Today, cattle ranching remains the primary driver of deforestation in the territory, according to the testimony of community leaders and civil society experts corroborated by a field visit by Climate Rights International.<sup>203</sup>

In 2021, IBAMA placed an embargo on 250 hectares of the *Traíras* farm after inspectors confirmed illegal deforestation within the Indigenous territory. The rancher is appealing IBAMA's sanctions, including a R\$1.5 million fine, in court. He

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<sup>199</sup> The Krikati Indigenous Territory was officially homologated on October 27, 2004 so cattle ranching on this territory after October 2004 would be illegal under Brazilian law, since the land was legally designated for exclusive indigenous use. Constitution of the Federative Republic of Brazil, art. 231 (1988). *Georgetown University Program on Democracy and the Rule of Law*, accessed July 15, 2025. <https://pdba.georgetown.edu/Constitutions/Brazil/brtitle8.html>.

<sup>200</sup> Aragão, Cauê Avila, Presidente, AGED/MA. "Ofício N° 660/2024/PRESI/AGED/MA." *Agência Estadual de Defesa Agropecuária do Maranhão (AGED/MA)*, June 10, 2024. See document SEI\_GOVMA – 1839321 – Ofício SN.

<sup>201</sup> Repórter Brasil, *Under the Radar: How Cattle Ranchers Caught Employing Slave Labour Are Part of the Supply Chains of Brazil's Largest Meatpacking Companies* (October 9, 2025), <https://reporterbrasil.org.br>.

<sup>202</sup> Ministério Público Federal, "Manifestação no processo nº 0005601-78.2017.4.01.3701 (Ação Civil Pública), PRM-Imperatriz-MA, Gabinete do 2º Ofício." *Ministério Público Federal*, 2022.

<sup>203</sup> Ibid.; Climate Rights International Interview with Maurício Krikati, Aldeia São José, Maranhão, May 10, 2025; Climate Rights International interview with Edilena Krikati, Imperatriz, MA, May 12, 2025; Climate Rights International interview with Gilderlan Rodrigues da Silva, CIMI, Imperatriz, Maranhão, May 9, 2025.



claims that the areas where deforestation occurred are not his, which is disputed by the environmental agency. As of July 2025, the embargoes remained in effect.

## Supply Chains

The rancher, Gomes Barros, who had one farm, *Varjãozinho*, within the Krikati Indigenous Territory and another nearby farm, *Traíras*, that overlapped illegally with that territory and was placed under embargo for illegal deforestation in 2021, has been an indirect supplier of **Masterboi**. Masterboi is a supplier of **Durlicouros**.<sup>204</sup>

- In January 2023, Gomes Barros transferred 226 head of cattle from the farm *Traíras*, which was under environmental embargo and which until 2022 had officially been registered as overlapping with the Krikati Indigenous Territory, to another farm [*Fazenda Santa Helena*] belonging to a second rancher.
- In June 2024—after authorities ordered Gomes Barros to remove cattle from the Indigenous territory—the second rancher’s farm supplied 52 head of cattle to **Masterboi**.

## Case #7 (*Vila Bela da Santíssima Trindade, Mato Grosso*)

HARMS:	Forced labor
TANNERIES:	Durlicouros, JBS, Minerva, Viposa

## Forced Labor

In July 2022, seven workers were rescued from a farm called *Alto Guaporé* in Vila Bela da Santíssima Trindade, Mato Grosso. The 15,000-hectare property is primarily used for soy and cattle and sits at the confluence of three of Brazil’s major biomes: the Pantanal, Amazon, and Cerrado.

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<sup>204</sup> Durlicouros [@durlicouros], “Pernambuco receberá um projeto piloto...” Instagram, April 5 2024. <https://www.instagram.com/durlicouros/reel/C5Y666dvst0/>.

According to the inspectors' report, the workers—six men and one woman—lived and worked in the forest, far from any infrastructure. They slept in camping tents that offered no insulation from the heat during the day or cold at night. With no toilets, they relieved themselves in the woods. The lone female worker used a flimsy tarp enclosure with a hole in the ground—open on three sides and located just ten meters from where meals were prepared and consumed. All workers bathed in a shared, makeshift straw structure with buckets and no privacy. To cook, workers used a fire hazard-prone setup: a gas stove under black tarp stretched over wooden poles, surrounded by fuel sources. When the gas ran out, they cooked directly on the ground with stones and an open flame. Meals were eaten on wooden stumps where they slept.<sup>205</sup>

Workers were subjected to illegal salary deductions for work equipment including boots, hats, pants, flashlights (essential for sleeping in the wilderness), soap, toilet paper, and other basic necessities.<sup>206</sup> A team leader kept a notebook tracking deductions, but without prices, workers didn't know how much they owed or what they would be paid at month's end, according to the inspector's report.<sup>207</sup> The only food provided was rice, beans, and spices: they were charged for all other items without knowing the price.<sup>208</sup>

All seven worked informally, without contracts, documentation, or legally mandated labor benefits such as vacations, and severance pay.

In October 2024, Brazilian authorities added the owner of the farm, Tomas Andrzejewski, to the Dirty List.

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<sup>205</sup> Brazil, Ministério da Economia, Subsecretaria de Inspeção do Trabalho, Superintendência Regional do Trabalho no Estado de Mato Grosso. "Relatório de Auditoria Fiscal Trabalhista – Erradicação do Trabalho Escravo: Empregador Auditado: Tomas Andrzejewski" (*Labor Audit Report – Eradication of Slave Labor: Audited Employer: Tomas Andrzejewski*). Cuiabá, MT, October 25, 2022, pp. 13–14, 22–23.

<sup>206</sup> Ibid.

<sup>207</sup> Ibid. p. 20.

<sup>208</sup> Ibid.

## Supply Chains

The rancher on the Dirty List has been an indirect supplier of **JBS**, **Marfrig**, **Minerva**, and **Pantanal**. Marfrig is a supplier of **Viposa**.<sup>209</sup> Pantanal is a supplier of **Durlicouros**.<sup>210</sup>

- In April 2024—after the workers were rescued but before he was added to the Dirty List—Andrzejewski transferred cattle from the *Alto Guaporé* farm, where the workers were rescued, to a second farm, *Santa Lúcia*, owned by another rancher.
  - Between May and September 2024, this second farm supplied cattle to **Minerva**.
- In December 2024—after Andrzejewski's inclusion in the Dirty List—he transferred cattle from *Alto Guaporé* to a third farm, *Flor do Cerrado II*, registered to his son, as well as to a fourth farm owned by someone else.
  - In January 2025, Andrzejewski's son supplied cattle from the third farm to **Marfrig**.
  - In January 2025, the fourth farm supplied cattle to another property, which in turn supplied **JBS** and **Pantanal** between February and July 2025.

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<sup>209</sup> Inspectors explicitly note that the leather is supplied to Viposa, among others. Secretaria de Estado de Meio Ambiente do Mato Grosso (SEMA-MT). "Parecer Técnico nº 117970/CIND/SUIMIS/2018," *Processo nº 616174/2017 (Tangará da Serra – Marfrig Global Foods S.A.)*, December 2018; Secretaria de Estado de Meio Ambiente do Mato Grosso (SEMA-MT). "Parecer Técnico nº 139685/GEBF/CIND/SUIMIS/2020," *Processo nº 243480/2020 (Várzea Grande – Marfrig Global Foods S.A.)*, July 6, 2020.

<sup>210</sup> The reports include declarations confirming that hides from the slaughterhouse were sent to the Durli Couros tannery. Secretaria de Estado de Meio Ambiente do Mato Grosso (SEMA-MT). "Parecer Técnico nº 163809/GEBF/CIND/SUIMIS/2022," *Processo nº 1684/2022 (Várzea Grande – Frigorífico Pantanal Ltda)*, December 2, 2022; Secretaria de Estado de Meio Ambiente do Mato Grosso (SEMA-MT). "Parecer Técnico nº 182154/CIND/SUIMIS/2024," *Processo nº 11367/2024 (Várzea Grande – Frigorífico Pantanal Ltda)*, October 31, 2024.

## Case #8 (Santa Carmem, Mato Grosso)

HARMS:	Labor abuses
TANNERIES:	Marfrig, Viposa

### Labor Abuses

In October 2019, federal labor inspectors rescued seven workers from a farm called *Santa Rita* in Santa Carmem, Mato Grosso.

According to the inspectors' report, workers were housed in plastic tarp shelters with dirt floors, with only the most basic shelter from rain and cold. They were required to use their own hammocks for sleeping, with one worker building his own makeshift bed from tree branches and an old foam mattress because no beds were provided.<sup>211</sup> Food preparation occurred outdoors on improvised wood-burning stoves with no proper storage or refrigeration. Workers drank untreated water from open pits in the forest contaminated with insects, dead foliage and "other impurities."<sup>212</sup> There were no sanitary facilities and auditors noted that trash was scattered around the tent including "feces, which instead of having proper disposal in septic or sewage systems, remained around where employees took their meals."<sup>213</sup>

Workers had no safety measures, protective equipment, pre-employment medical examinations, or first aid supplies. None had the employment registration or documentation required by Brazilian law.<sup>214</sup>

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<sup>211</sup> Brazil, Serviço Público Federal, Ministério da Economia, Subsecretaria de Inspeção do Trabalho, Divisão de Fiscalização para Erradicação do Trabalho Escravo, Grupo Especial de Fiscalização Móvel, "Relatório de Fiscalização - Antônio Leucir Mascarello, Fazenda Santa Rita," inspection report, Santa Carmem, MT, October 8-18, 2019. pg 21-22

<sup>212</sup> Ibid. pp. 8-9.

<sup>213</sup> Ibid. p. 27.

<sup>214</sup> Brazil, Serviço Público Federal, Ministério da Economia, Subsecretaria de Inspeção do Trabalho, Divisão de Fiscalização para Erradicação do Trabalho Escravo, Grupo Especial de Fiscalização Móvel, "Relatório de Fiscalização - Antônio Leucir Mascarello, Fazenda Santa Rita," inspection report, Santa Carmem, MT, October 8-18, 2019. pg 21-22. Ibid. p. 6

The rancher, Antônio Leucir Mascarello, was added to the Dirty List in April 2022 and remained there for two years, until April 2024. The negotiations related to the labor inspection—including signing agreements with authorities to compensate workers for violations—were mainly conducted by Mascarello’s son, according to the labor inspection report.<sup>215</sup> Moreover, one of the rescued workers told the labor inspectors that he had been working under the supervision of both father and son.<sup>216</sup>

## Supply Chains

*Santa Rita*, the farm run by Leucir Mascarello from which the workers were rescued, is part of a complex of contiguous farms, each named “Santa Rita” followed by distinct Roman numerals. *Santa Rita IX*, owned by Santa Rita Participações e Administração Ltda., a company in which Leucir Mascarello was a partner, was a direct supplier of **Marfrig**. Marfrig is a supplier of **Viposa**.<sup>217</sup>

- In 2022 and 2023, after Leucir Mascarello was added to the Dirty List, his son sold cattle to **Marfrig** from *Santa Rita IX*.<sup>218</sup>

## Case #9 (Ribeirão do Largo, Bahia)

HARMS:	Labor abuses	
TANNERIES:	Mastrotto	

<sup>215</sup> Brazil, Serviço Público Federal, Ministério da Economia, Subsecretaria de Inspeção do Trabalho, Divisão de Fiscalização para Erradicação do Trabalho Escravo, Grupo Especial de Fiscalização Móvel. “Relatório de Fiscalização – Antônio Leucir Mascarello, Fazenda Santa Rita” (*Inspection Report – Antônio Leucir Mascarello, Santa Rita Farm*). Inspection report, Santa Carmem, MT, October 8–18, 2019, pp. 7, 31, 94.

<sup>216</sup> Ibid.

<sup>217</sup> Inspectors explicitly note that the leather is supplied to Viposa, among others. Secretaria de Estado de Meio Ambiente do Mato Grosso (SEMA-MT). “Parecer Técnico nº 117970/CIND/SUIMIS/2018.” *Processo nº 616174/2017 (Tangará da Serra – Marfrig Global Foods S.A.)*, December 2018. Secretaria de Estado de Meio Ambiente do Mato Grosso (SEMA-MT). “Parecer Técnico nº 139685/GEBC/CIND/SUIMIS/2020.” *Processo nº 243480/2020 (Várzea Grande – Marfrig Global Foods S.A.)*, July 6, 2020.

<sup>218</sup> Cadastro Nacional da Pessoa Jurídica (CNPJ), “Consulta quadro de sócios e administradores – QSA: Santa Rita Participações e Administração Ltda” [Corporate Registry Query]. *CNPJ 19.013.541/0001-82*. Accessed July 15, 2025.



## Labor Abuses

In August 2019, federal labor inspectors rescued three workers from a farm called *Guanabara* in Ribeirão do Largo, Bahia. One of the workers had been working there for 14 years without a formal contract and the other two for eight and four months, respectively. The workers lacked formal employment registration and were denied access to mandatory labor protections and benefits such as vacations, severance fund payments, and medical exams.<sup>219</sup>

According to the inspectors' report, workers were housed in shelters precarious enough to "creat[e] a risk of death," were deemed an "imminent risk," and ordered to be demolished.<sup>220</sup> The house of the worker who had been there for 14 years was wedged between a pigsty and a chicken coop, "the entrance area of the house was taken over by animal feces... making the smell of the accommodation unbearable."<sup>221</sup> The two other workers slept on an old door balanced on sawhorses. None of the shelters had toilets, forcing workers to relieve themselves in the woods. Bathing areas were outside with no walls or privacy, even during cold nights. Electrical wiring was exposed throughout the camp; to turn on lights, workers had to manually twist bare wires together.<sup>222</sup>

The farm provided no potable water. Workers relied on untreated spring water stored in plastic drums and used repurposed automotive oil containers to cook. Food was stored without refrigeration, with meat hanging from improvised clotheslines.<sup>223</sup> The farm's main house had far better conditions, but workers were barred from using it.<sup>224</sup>

In October 2023, the rancher, Eduardo Augusto Espírito Santo Novaes, was added to the Dirty List, where he remains today.

## Supply Chains

The rancher on the Dirty List has been a direct supplier of **Frigosaj**. Frigosaj supplies a tannery operated by **Mastrotto**.<sup>225</sup>

- In November 2022—after his workers were rescued and before he was placed on the Dirty List—the rancher supplied cattle from a second property that he owned, *Olhos D'agua*, to a slaughterhouse belonging to **Frigosaj**.

- In October 2023—after he was placed on the Dirty List—the rancher again supplied cattle from this second property to Frigosaj.

## Case #10 (Corumbá, Mato Grosso do Sul)

HARMS:	Forced Labor
TANNERIES:	JBS

### Forced Labor

In February 2023, federal labor inspectors rescued six workers—including five Paraguayan citizens—from a remote cattle farm called *Três Estrelas* in Corumbá, Mato Grosso do Sul, accessible to the inspectors' team only by helicopter.<sup>226</sup>

According to the inspectors' report, the workers were living in precarious shelters they built themselves out of tree trunks and branches, covered with plastic tarps.<sup>227</sup> These makeshift structures had no walls. Workers slept on beds fashioned from branches with old, discarded mattresses.<sup>228</sup> Workers had no access to potable water and stored cloudy, untreated water in plastic drums. There were no bathrooms or sanitary facilities in the camp or work areas. Workers were forced to relieve themselves in the surrounding bush, where they were

<sup>219</sup> Brazil, Ministry of Economy, Special Secretariat of Social Security and Labor. "Labor Inspection Report – Operation 20: Eduardo Augusto Espírito Santos Novais, Fazenda Guanabara" (*Relatório de Fiscalização – Operação 20: Eduardo Augusto Espírito Santos Novais, Fazenda Guanabara*). Regional Superintendency of Labor and Employment in Bahia, Special Group for Combating Work Analogous to Slavery in Bahia, 2019, pp. 11–12.

<sup>220</sup> Ibid. p. 13

<sup>221</sup> Ibid. p. 14

<sup>222</sup> Ibid.

<sup>223</sup> Ibid.

<sup>224</sup> Ibid. p. 23

<sup>225</sup> Instituto do Meio Ambiente e Recursos Hídricos da Bahia (Inema-BA), "Relatório de Inspeção nº 01/2024 (COIND DIRRE/2024)," (*Inspection Report No. 01/2024 [COIND DIRRE/2024]*). *Processo SEI nº 046.1070.2021.0006152-25 (Frigosaj Frigorífico Ltda, Santo Antônio de Jesus – BA)*, December 12–13, 2023.

<sup>226</sup> Brazil, Ministério do Trabalho e Emprego, Secretaria de Inspeção do Trabalho, Superintendência Regional do Trabalho em Mato Grosso do Sul. "Relatório de Fiscalização: Egidio Vilani Comin, Fazenda Três Estrelas" (*Inspection Report: Egidio Vilani Comin, Três Estrelas Farm*). February 7–April 28, 2023.

<sup>227</sup> Ibid pp. 8–9.

<sup>228</sup> Ibid. pp. 8–9.

exposed to venomous snakes and scorpions. No formal contracts, protective equipment, or medical examinations were provided.<sup>229</sup>

The Federal Prosecutor's Office initiated a criminal case in August 2023 charging the rancher with reducing workers to conditions analogous to slavery.<sup>230</sup> In April 2024, the rancher who owned the farm was added to the Dirty List.<sup>231</sup> However, in May 2024, a state court granted the rancher a preliminary injunction removing his name from the government's Dirty List until the criminal case reaches a final decision. The ruling did not evaluate the merits of the case but stated that remaining on the list could financially harm the business and lead to job losses.<sup>232</sup> As of September 2025, no decision had been made in the criminal case.<sup>233</sup>

## Supply Chains

The rancher placed on the Dirty List—whose listing was suspended pending the resolution of a criminal case against him for reducing workers to conditions analogous to slavery—has been a direct supplier of **JBS**:

- Between March 2023 and April 2024—after the workers were rescued and before he was placed on the Dirty List—the rancher sold cattle from two other farms he owned to **JBS**, including selling from one farm after the criminal case against him was filed in August 2023.
- In August 2024—after his inclusion on the Dirty List was suspended but while he had a pending criminal case for reducing workers to conditions analogous to slavery—the rancher again sold cattle from these other farms to **JBS**.

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<sup>229</sup> Ibid.

<sup>230</sup> Ministério Público Federal, *Case No. 5000732-95.2023.4.03.6004*. Sistema APTUS MPF. Accessed July 14, 2025. <https://apps.mpf.mp.br/aptusmpf/index2#/detalhe/920000000000019364556?modulo=0&sistema=portal>.

<sup>231</sup> Ministério do Trabalho e Emprego, “Combate ao trabalho escravo e análogo ao de escravo.” *Ministério do Trabalho e Emprego*, accessed July 14, 2025. <https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/combate-ao-trabalho-escravo-e-analogo-ao-de-escravo>.

<sup>232</sup> Tribunal Regional do Trabalho da 24ª Região. “Decisão de Tutela de Urgência Antecedente.” *Processo nº PetCiv-0024528-55.2024.5.24.0005*, *Diário Eletrônico da Justiça do Trabalho*, Caderno nº 3964/2024, May 6, 2024.

<sup>233</sup> Ministério Público Federal, *Case No. 5000732-95.2023.4.03.6004*. Sistema APTUS MPF. Accessed July 14, 2025. <https://apps.mpf.mp.br/aptusmpf/index2#/detalhe/920000000000019364556?modulo=0&sistema=portal>

## VI. Fashion and Footwear Brands

While far smaller in scale than beef, leather production is a significant revenue source of Brazil's cattle industry, generating around US\$3 billion annually and sustaining around 40,000 jobs.<sup>234</sup> For some meatpackers, it can account for as much as a quarter of annual earnings, while providing a buffer that can help ensure profitability in the face of fluctuating beef markets.<sup>235</sup>

Leather production holds particular importance for addressing the environmental and human rights challenges facing Brazil's cattle sector. Roughly 80 percent of Brazilian leather is exported, much of it to markets that are generally more attentive to sustainability issues than beef markets.<sup>236</sup> Fashion and footwear companies may be especially sensitive to such concerns, as they typically market their brands as much on image as on product, and their sourcing decisions tend to attract greater scrutiny.

Given their heightened visibility, these global brands can wield influence within cattle supply chains that is disproportionate to the monetary value of the leather they purchase. This influence can extend to shaping international public opinion of Brazil's cattle sector as a whole, increasing awareness about supply chain transparency and its link to deforestation and human rights abuses, and encouraging the government of Brazil to take the necessary steps to improve supply chain traceability.<sup>237</sup>

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<sup>234</sup> Leather production "generates 40,000 direct jobs in Brazil, with 310 tanning plants, 2,800 suppliers of components for both the leather and shoe industries, and 120 machinery and equipment manufacturers," according to a 2020 study by Bain & Company and The Nature Conservancy. Libera, Carlos, et al. "Brazil's Path to Sustainable Cattle Farming." *The Nature Conservancy & Bain & Company*, 2020. <https://www.nature.org/content/dam/tnc/nature/en/documents/English.Bain.TNC.pdf>.

<sup>235</sup> Ibid; and Natural Intelligence (NINT), *The Impact of a Shift in Global Demand for Leather on Brazilian Slaughterhouses*. Prepared for Rainforest Foundation Norway. February 2023. <https://dv719tqmsuwvb.cloudfront.net/documents/Economic-study-of-shift-in-global-leather-demand-on-Brazilian-slaughterhouses-report-by-NINT-for-Rainforest-Foundation-Norway.pdf>

<sup>236</sup> A 2013 study found that whereas 40 percent of Brazilian beef serve markets that have expressed concern over the environmental impacts of their sourcing, 85 percent of leather production serve such markets. See Walker, N. F., et al. "From Amazon Pasture to the High Street: Deforestation and the Brazilian Cattle Product Supply Chain." *Tropical Conservation Science* 6, no. 3, 446-467, 2013. <https://doi.org/10.1177/194008291300600309>.

<sup>237</sup> Libera, Carlos, et al. "Brazil's Path to Sustainable Cattle Farming." *The Nature Conservancy & Bain & Company*, 2020. <https://www.nature.org/content/dam/tnc/nature/en/documents/English.Bain.TNC.pdf>.

## Leather Supply Chains

Once cattle are slaughtered in Brazil, meatpackers pass the raw hides to tanneries—either their own or those operated by other companies—where the hides are processed with salt or tanned into wet blue leather.<sup>238</sup> From there, the leather enters the global production chains of fashion and footwear companies through multiple routes. A significant share is exported directly to European tanning hubs—especially Italy—which specialize in producing refined, high-quality leather for luxury fashion brands.<sup>239</sup>

A second major route runs through Asia, where countries like China, India, Bangladesh, Pakistan, and Vietnam serve as tanning and manufacturing centers, processing Brazilian wet blue into finished leather and turning it into shoes, handbags, upholstery, and other products for international brands sold in Europe, the United States, and other markets.<sup>240</sup> This multi-stop journey means that leather from Amazon-raised cattle can pass through several companies and countries before ultimately ending up in a handbag in Paris or a pair of sneakers in New York.<sup>241</sup>

Stand.earth Research Group conducted extensive research using customs records and other data sources to trace supply chain links between (1) the six Brazilian tanneries identified in this report as having indirect suppliers linked to deforestation, forced labor and/or invasions of Indigenous lands, (2) Asian tanneries and manufacturers, and (3) fashion and footwear brands in Europe, the United States, and other markets. The research identified 24 international brands that, between 2023 and 2024, were linked through their supply chains to one or more of those six Brazilian tanneries. These include athletic footwear and apparel brands such as

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<sup>238</sup> Leather production begins when fresh hides are processed in tanneries to produce wet blue leather—the initial, non-perishable, bluish-tinted form created through tanning and hair removal. From there, the leather undergoes semi-finishing (softening and thickness adjustment) before receiving final finishing treatments for enhanced durability, aesthetic qualities, and usability in products such as footwear, upholstery, and fashion accessories. See Centro das Indústrias de Curtumes do Brasil (CICB), “Produção,” *O Couro*, accessed August 23, 2025. <https://cicb.org.br/producao>.

<sup>239</sup> Dialogue Earth, “Amazon Leather Industry Expansion Raises Environmental Concerns,” *Dialogue Earth*, April 25, 2024. <https://dialogue.earth/en/forests/47001-amazon-leather-industry-expansion-environmental-concerns/>.

<sup>240</sup> Fair Labor Association, “Toward promoting human rights and decent working conditions in the leather supply chain,” *Fair Labor Association*, May 2025. [https://www.fairlabor.org/wp-content/uploads/2025/05/FLA\\_Leather-Study-Brazil-Report.final\\_.pdf](https://www.fairlabor.org/wp-content/uploads/2025/05/FLA_Leather-Study-Brazil-Report.final_.pdf).

<sup>241</sup> World Footwear, “Strong 2024 for the Brazilian Leather Industry,” *World Footwear*, January 16, 2025. <https://www.worldfootwear.com/news/strong-2024-for-the-brazilian-leather-industry-/10383.html>.

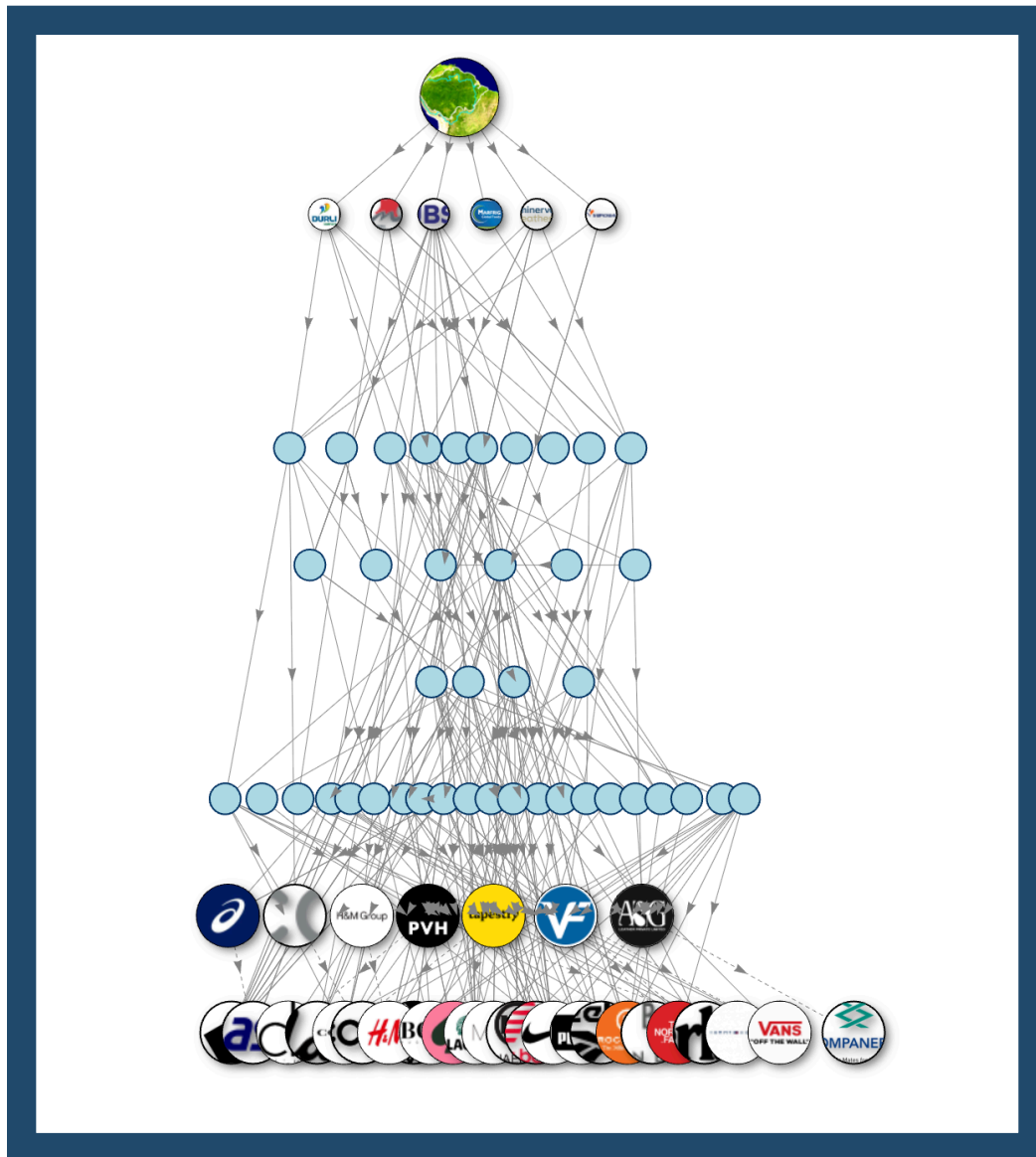


Adidas, Asics, Converse, New Balance, Nike, Puma, Reebok, Rockport, The North Face, and Vans, as well as fashion and apparel brands including Calvin Klein, Clarks, Coach, ECCO, H&M, Hugo Boss, Kate Spade, Kompanero, Lacoste, M&S, Michael Kors, Ted Baker, Timberland, and Tommy Hilfiger.

All 24 brands were found to have multiple links to one or more of those tanneries in their supply chains—usually through intermediaries in Asia. Every brand was linked through its supply chains to tanneries operated by JBS or Durlicouros. Most were linked to *both* JBS and Durlicouros—which together are linked through their supply chains to eight of the 10 cases documented in this report. Many were also linked through their supply chains to one or more of the four other tanneries—Marfrig, Mastrotto, Minerva, and Viposa—that source from slaughterhouses linked through their supply chains to at least one of the cases in the report.

Climate Rights International wrote to all 24 brands in advance of the report to inquire about their due diligence into their leather supply chains. Only eight brands responded. Their responses can be found in Appendix B.

The supply chain connections documented by Stand.earth Research Group do not prove that any individual brand has necessarily used leather from a specific tannery, or leather produced by the farms implicated in these cases. They do, however, demonstrate that these brands' supply chains include producers implicated in serious environmental and human rights harms, creating a risk of supply chain contamination that runs counter to the sustainability commitments that most of them have made.



The supply chains linking these brands with the tanneries can be seen in an interactive graphic visualizer prepared by Stand.earth Research Group found [here](#).

For each tannery company, Stand.earth Research Group used Brazilian export customs data to determine first-tier customers (i.e. leather processors) around the world. It then conducted extensive research over several months to identify supply links between each of these leather processors and other processors, product manufacturers, and consumer-facing companies and brands. These links were uncovered by analyzing data from a variety of sources:

- Brazilian export customs data (from 2023);
- Other global import/export customs data (e.g. India, Indonesia, Mexico, Philippines, Vietnam);
- US imports vessel manifest data;
- Company/brand voluntary supplier disclosure documents;
- Company annual reports, investor presentations, and websites.

Each of these individual links was added to a single database, and filters were applied to ensure that brands are only included if they have at least two direct suppliers that are linked to the tanneries operated by one or more of the six companies within the past two years.

The visualizer shows all connections from one company to the next in a given supply chain, where each line represents the flow of leather or leather products. Dashed lines in the visualizer indicate evidence that is obfuscated due to data limitations. Customs data is only available for some but not all countries. In Asia, this means there are data gaps involving some important hubs for manufacturing fashion and footwear, such as China, Cambodia, Thailand, Taiwan and Nepal. For example, if a company imports leather into one of these countries and the same company exports a finished product out of another country, we have no way to verify whether or not the supply chain is continuous. Dashed lines are used in the diagram to indicate such cases. Dashed lines are also used in situations where one or both of the countries is not specified in the raw data. Additionally, dashed lines are used to refer to the relationship between companies and brands that they own.

It is important to note that each individual connection is not absolute proof that any one brand has used leather from any specific tannery or produced by farms linked to deforestation or human rights abuses. Rather, it demonstrates that their supply chains contain producers with these links.

These new findings regarding the 24 brands are consistent with previous studies examining international supply chains for Brazilian leather.<sup>242</sup> These include a 2021 investigation by Stand.earth, using data from 2018-2020, that documented that more than 100 fashion and footwear brands had supply chain links to Brazilian slaughterhouses with suppliers implicated in illegal deforestation in the Amazon—including 20 of the same brands identified in the new study for this report.<sup>243</sup>

Moreover, even without the specific links identified by these studies, the well-documented absence of effective traceability within Brazil's cattle sector—combined with the country's widespread problems of illegal deforestation, forced labor, and Indigenous land invasions—means that currently, with limited exceptions, Brazilian leather cannot be reliably guaranteed to be free of serious environmental and human rights harms. Any brand selling products containing leather from Brazil therefore runs a considerable risk of contributing to the incentivizing of these harms.

## *Sustainability Commitments and Responsibilities*

Nearly all of the brands and/or their parent companies have made commitments to ensure the sustainability of their businesses. Most have committed to reducing greenhouse gas emissions, and more than half have made commitments regarding deforestation in their supply chains.

Most of the companies have made commitments related to human rights as well, including all but one committing to address forced labor, and several making commitments regarding the rights of Indigenous peoples. While the scope, specificity, and ambition of these commitments vary among the brands, any company sourcing leather from Brazil without extensive due diligence into the full

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<sup>242</sup> MacFarquhar, Christina, et al, "Hidden Deforestation in the Brazil-China Beef and Leather Trade," *Global Canopy*, August 2019. <https://globalcanopy.org/wp-content/uploads/2020/12/Hidden-deforestation-in-the-Brazil-and-China-beef-and-leather-trade.pdf>; Follow the Money, SOMO, and Stand.earth. "Brazil: Investigation by Follow the Money, SOMO and Stand.Earth Indicates Alleged Connections between the Leather Used by Adidas and Deforestation in the Amazon." *Business & Human Rights Resource Centre*, January 16, 2024. <https://www.business-humanrights.org/en/latest-news/brazil-investigation-by-follow-the-money-somo-and-standearth-indicates-alleged-connections-between-the-leather-used-by-adidas-and-deforestation-in-the-amazon/>.

<sup>243</sup> Stand.earth Research Group, "Nowhere to Hide: How the Fashion Industry Is Linked to Amazon Rainforest Destruction," *Stand.earth*, November 29, 2021. [https://cdn.stand.earth/wp-content/uploads/2021/11/Nowhere-to-Hide\\_-How-the-Fashion-Industry-is-Linked-to-Amazon-Rainforest-Destruction.pdf](https://cdn.stand.earth/wp-content/uploads/2021/11/Nowhere-to-Hide_-How-the-Fashion-Industry-is-Linked-to-Amazon-Rainforest-Destruction.pdf).

supply chain for that leather is at risk of a supply chain contaminated with illegal deforestation and/or human rights abuses.

## Company commitments

*This chart is a simplified overview of brand commitments. The statements underlying each check mark vary widely in scope, specificity, and strength. Some are detailed measurable targets, while others are general or aspirational. Because companies use different metrics and framing, these commitments are not directly comparable to a one-to-one basis.*

Brand ▲	UN Guiding Principles	Explicit Forced Labor/Modern Slavery Policy	Explicit Indigenous Land Policy	Deforestation Policy	Net-Zero or Scope 3 Commitment	Sourcing Ban on Brazil/Amazon
Adidas	✓	✓	✓	✓	✓	—
ASICS	✓	✓	—	✓	✓	—
Calvin Klein (PVH Corp)	✓	✓	✓	✓	✓	✓
Clarks	✓	✓	✓	✓	—	—
Coach (Tapestry)	✓	✓	—	✓	✓	—
Converse (Nike inc)	✓	✓	—	✓	✓	✓
ECCO	—	✓	—	—	—	—
H&M	✓	✓	—	✓	✓	✓
Hugo Boss	✓	✓	✓	✓	✓	—
Kate Spade (Tapestry)	✓	✓	—	✓	✓	—
Kompanero	—	—	—	—	—	—
Lacoste	✓	✓	—	—	✓	—
M&S	✓	✓	—	✓	✓	✓
Michael Kors (Capri Holding)	✓	✓	—	✓	—	—
New Balance	—	✓	—	✓	✓	—
Nike	✓	✓	—	✓	✓	✓
Puma	✓	✓	—	✓	✓	—
Reebok (Authentic Brands)	—	✓	—	—	—	—
Rockport (Authentic Brands)	—	✓	—	—	—	—
Ted Baker (Authentic Brands)	—	✓	—	✓	✓	—
The North Face (VF Corp)	✓	✓	—	✓	✓	✓
Timberland (VF Corp)	✓	✓	—	✓	✓	✓
Tommy Hilfiger (PVH Corp)	✓	✓	✓	✓	✓	✓
Vans (VF Corp)	✓	✓	—	✓	✓	✓

\* Under the UN Guiding Principles, companies commit to respect all internationally recognized human rights — including prohibitions on forced labor and protections for Indigenous people \*  
Source: Climate Rights International • Created with Datawrapper



- **UN Guiding Principles (UNGPs):** Company references the UN Guiding Principles on Business and Human Rights, which require respect for all internationally recognized human rights — including prohibitions on forced labor and protections for Indigenous peoples.
- **Explicit Forced Labor / Modern Slavery Policy:** Company has a formal prohibition on forced labor, modern slavery, or human trafficking in its operations and supply chain. Some policies are broad (e.g., a general ban across suppliers), while others include detailed supplier codes of conduct and enforcement mechanisms.
- **Explicit Indigenous Land Policy:** Company makes a specific commitment to respect Indigenous peoples' land rights, such as pledging not to source from invaded lands or requiring free, prior, and informed consent. (Broader human rights or UNGP references without an explicit land rights mention are not counted here.)
- **Deforestation Policy:** Company has pledged to eliminate deforestation and/or conversion from its raw material supply chains, often with reference to leather or other commodities. The scope and rigor of these policies vary, with some tied to dated elimination goals and others framed as general support for multi-stakeholder initiatives.
- **Net-Zero or Scope 3 Commitment:** Company has pledged either full net-zero emissions or specific Scope 3 emissions reductions. Because Scope 3 includes purchased goods and services, these commitments necessarily cover leather sourcing. Achieving them would require full visibility into cattle supply chains, including indirect suppliers.
- **Sourcing Ban on Brazil/Amazon:** Company has a stated prohibition on sourcing leather from either Brazil as a whole or from specific high-risk biomes such as the Amazon or Cerrado. Unlike general deforestation commitments, these are categorical exclusions, with some brands prohibiting Brazilian leather entirely, while others restrict sourcing from cattle raised in the Amazon or other designated biomes.

In addition to their voluntary commitments, all the brands have internationally recognized responsibilities under the UN Guiding Principles on Business and Human Rights (UNGPs), whether or not they have explicitly committed to them. These include the responsibility to avoid causing or contributing to human rights harms and to address any such adverse impacts linked to their operations or value chains. This responsibility extends even to impacts that they have not directly caused but to which they are connected through business relationships. To meet this standard, companies must carry out human rights due diligence by assessing actual and potential risks—and when they identify adverse impacts within their value chains, they are expected to use what leverage they have to prevent or mitigate the

harms.<sup>244</sup> If unable to do so, they should seek to acquire and exercise more effective leverage—and only if that fails should they then consider ending the business relationship.<sup>245</sup>

Companies have taken different approaches to fulfilling their commitments and responsibilities, particularly those on deforestation. Some, such as VF Corporation (parent company of The North Face, Timberland, and Vans), now prohibit sourcing leather from Brazil for their international business due to concerns about environmental harm. In response to our letter, VF, which has supply chain links to all six tannery-operating companies, stated that it has “no indication that leather or hides from Brazil are sourced for VF products.”<sup>246</sup> VF told Climate Rights International that it undertakes extensive supply chain and risk mapping, checks documentation at suppliers, and uses a range of data sources to monitor the supply chain on a real time basis.<sup>247</sup> Despite these many efforts, with six Brazilian tanneries in its supply chain, the risk of contamination remains.

H&M also imposed a “pause” in use of Brazilian leather in 2019 “until there are credible assurance systems in place to verify that the leather does not contribute to environmental harm in the Amazon.” However, in 2021 H&M acknowledged that, “due to the low transparency the whole industry is facing in the leather supply chain, the risk will remain.”<sup>248</sup> Given that Stand.earth Research Group found H&M had supply chain links to Brazilian tanneries operated by JBS and Durlicouros in 2023 and 2024, the risk continues.

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<sup>244</sup> United Nations, “Guiding Principles on Business and Human Rights: Implementing the United Nations, Protect, Respect and Remedy Framework.” *United Nations*, 2011, [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf).

<sup>245</sup> Ibid., principle 19(b) commentary; “The responsibilities of business enterprises under the Guiding Principles...include the responsibility to act in regard to actual and potential impacts related to climate change.”, para. 17(g). United Nations. “Information Note on Climate Change and the Guiding Principles on Business and Human Rights.” *United Nations Working Group on Business & Human Rights*, June 2023. <https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/Information-Note-Climate-Change-and-UNGPs.pdf>.

<sup>246</sup> VF acknowledged, in a telephone conversation, that some Brazilian leather is used by licensees operating in Brazil due to legal restrictions on outside leather entering the country. See VF Corp response to Climate Rights International, Appendix B.

<sup>247</sup> Telephone conversation with representatives of VF, September 16, 2025.

<sup>248</sup> Udasin, Sharon, “Major fashion brands may be linked to Amazon deforestation: report,” *The Hill*, November 30, 2021. <https://thehill.com/policy/equilibrium-sustainability/583666-major-fashion-brands-may-be-linked-to-amazon-deforestation/>.

Other companies, such as PVH (parent company of Tommy Hilfinger and Calvin Klein) and Marks and Spencer (M&S), ban Brazilian leather only from the Amazon—while Nike bans it from the Amazon and the Cerrado. Given the opacity of Brazilian cattle supply chains described in this report, it is unclear how these companies ensure that any leather they receive from Brazil is not from cattle raised in the areas they have banned.<sup>249</sup>

Some brands such as Coach and Kate Spade, through their parent company Tapestry, and Adidas take a different approach and have instead made efforts to map their leather supply chains upstream from the tanneries. Adidas has been reported as saying that it believes continued engagement allows it “to have a greater impact to prevent deforestation.”<sup>250</sup> Both Tapestry and Adidas told Climate Rights International that they map their leather supply chain back to the slaughterhouses and, where feasible, back to the farms on which the cattle were raised. However, Tapestry acknowledged that they are unable to map the full supply chain, noting in particular the problem of indirect suppliers within the Brazilian cattle sector, while Adidas acknowledged the “complexities and risks in the Brazilian cattle sector” and stated that they are “working toward full traceability” by 2030.<sup>251</sup>

For some of the brands linked through their supply chains to one or more of the six tannery-operating companies, Climate Rights International could find little or no public information about what, if anything, they are doing to monitor their leather supply chain to ensure it is not contaminated with deforestation, forced labor or invasions of Indigenous lands.

Some brands using Brazilian leather cite certifications that their suppliers have received from the Leather Working Group (LWG), a global, multi-stakeholder initiative that was established in 2005 to promote sustainable practices in the leather industry. Yet LWG audits apply only to the tannery stage of production, where they assess environmental performance measures such as wastewater

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<sup>249</sup> Nike, Inc., “Animal Skins Policy.” *Nike, Inc.*, July 1, 2024. [https://media.about.nike.com/files/372abf76-8135-4887-a2c8-8c9044c61030/Nike\\_Animal\\_Skins\\_Policy\\_2024\\_7\\_01.pdf](https://media.about.nike.com/files/372abf76-8135-4887-a2c8-8c9044c61030/Nike_Animal_Skins_Policy_2024_7_01.pdf).

<sup>250</sup> van Heugten, Yara. “Adidas’ Most Popular Sneakers Linked to Deforestation and Modern Slavery in Brazil.” *Follow the Money / FTM*, January 16, 2024. <https://www.ftm.eu/articles/the-dark-side-of-your-adidas-sneaker>.

<sup>251</sup> Adidas response to Climate Rights International, Appendix B; and telephone conversation with representatives from Tapestry, September 8, 2025.

treatment, chemical management, and basic health and safety.<sup>252</sup> They do not extend upstream to slaughterhouses, much less the cattle ranches where deforestation, labor exploitation, and land invasions occur.<sup>253</sup> As LWG makes clear on its website:

LWG certification is focused on leather manufacturing and manages the chain of custody for this part of the value chain. For LWG members to make claims regarding the sustainability credentials of products made with leather from LWG certified sources all stages of the value chain need to be connected and the flow of materials monitored.<sup>254</sup>

Nor does LWG engage substantively with social and ethical concerns like labor conditions in slaughterhouses, Indigenous land rights, or animal welfare.<sup>255</sup> This limited scope allows a tannery to achieve a top “Gold” rating for on-site environmental management even while processing hides sourced from properties linked to illegal deforestation or human rights abuses.<sup>256</sup> In other words, while LWG certification is a useful tool for assessing the environmental performance of a tannery, it currently cannot—and does not purport to—assess the tannery’s upstream supply chain.

Some brands rely on the argument that only a small portion of the leather they use comes from Brazil.<sup>257</sup> For example, Lacoste noted in its response that only 0.0001%

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<sup>252</sup> Leather Working Group, “Deforestation Due Diligence.” *Leather Working Group*, accessed August 23, 2025. <https://www.leatherworkinggroup.com/our-impact/deforestation/>.

<sup>253</sup> Leather Working Group, “Deforestation Due Diligence.” *Leather Working Group*, accessed August 23, 2025. <https://www.leatherworkinggroup.com/our-impact/deforestation/>.

<sup>254</sup> Leather Working Group, “Chain of Custody / Traceability.” *Leather Working Group*, accessed August 23, 2025. <https://www.leatherworkinggroup.com/our-impact/traceability/chain-of-custody/>.

<sup>255</sup> Leather Working Group, “Leather Manufacturer Standard.” *Leather Working Group*, accessed August 26, 2025. <https://www.leatherworkinggroup.com/certification/leather-manufacturer-standard/>; Hakansson, Emma. “What is the Leather Working Group certification, and does it make for sustainable and ethical leather?” *Collective Fashion Justice*, accessed August 25, 2025. <https://www.collectivefashionjustice.org/articles/what-is-the-leather-working-group-certification-and-does-it-make-for-sustainable-and-ethical-leather>.

<sup>256</sup> Leather Working Group, “Certified Suppliers.” *Leather Working Group*, accessed August 23, 2025. <https://www.leatherworkinggroup.com/get-involved/our-community/certified-suppliers/>; Leather Working Group, “Chain of Custody.” *Leather Working Group*, accessed August 26, 2025. <https://www.leatherworkinggroup.com/our-impact/traceability/chain-of-custody/>.

<sup>257</sup> Anderson, William, “Adidas’ response to alleged links between leather and Amazon deforestation” *Business and Human Rights Resource Center*, January 27, 2024. <https://www.business-humanrights.org/en/latest-news/adidas-response-to-alleged-links-between-leather-and-amazon-deforestation>; Deepen, Laurel. “Coach’s leather could pose deforestation threat: report,” *Fashion Dive*, July 16, 2025. <https://www.supplychaindive.com/news/earthsight-deforestation-coach-supply-chain-risks/752513/>.

of its leather comes from Brazil.<sup>258</sup> Small percentages do not diminish the severity of the harms caused by cattle production in the Amazon, nor the responsibility of the companies to conduct proper due diligence and address such harms within their supply chains. Lacoste stated in its response that it has “ensured that all suppliers of this leather are not involved in any deforestation policies.” However, it does not explain how it has done so—and, given the opacity of cattle supply chains and the problem of indirect suppliers, it is unclear how it could do so.

### *The Way Forward: Exit or Engage?*

In addition to voluntary commitments and UN-mandated responsibilities, fashion and footwear brands now face a wave of new regulations, particularly in Europe, that have created or will create legally binding obligations to address human rights and environmental harms in their supply chains. As outlined in the next chapter, these include the EU Deforestation Regulation and the EU Forced Labour Regulation, which will require the adoption of due diligence policies far more stringent than those many companies currently apply. For companies sourcing Brazilian leather, these obligations will be difficult—if not impossible—to meet without major improvements in traceability across the country’s cattle sector.

These companies will face a choice: attempt to eliminate Brazilian tanneries from their supply chains or engage with suppliers and policymakers to promote more effective traceability and monitoring in Brazil. While banning Brazilian leather from their supply chains can be a principled decision, it cedes whatever leverage companies have over their suppliers to make real change on the ground. This is why, under the UN Guiding Principles, businesses should first use whatever leverage they have to address the problem—and if this leverage is insufficient, they should try to increase their leverage—before giving up.<sup>259</sup>

One way international brands can increase their leverage is by working in coalition. Where possible, they should work with other companies and industry groups to pool

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<sup>258</sup> Lacoste response to Climate Rights International, Appendix B.

<sup>259</sup> United Nations, “Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework,” *United Nations*, 2011, [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf).

resources, knowledge, and capacity to monitor leather supply chains from product manufacturers through Brazilian tanneries and slaughterhouses to cattle ranches.

It is important these companies recognize that, in the absence of sector-wide traceability, the capacity of Brazilian tanneries and slaughterhouses to eliminate non-compliant farms from their supply chains, and their own capacity to fully trace their leather supply chains, will remain limited. Moreover, even if some companies do actually manage to clean up their own supply chains, without sector-wide improvements this achievement will likely encourage the segmentation of the cattle market while doing little to save the country's forests or prevent the human rights abuses fueling their destruction.

To help Brazil make real progress in rooting out these problems, global fashion and footwear companies should use their influence—individually and collectively—to support the creation of a national traceability and monitoring mechanism. When it comes to cattle-driven deforestation and related abuses—particularly in the Amazon—all supply chains must be sustainable, or ultimately none will be.



## VII. Government Efforts to Promote Sustainable Supply Chains

Brazil has made important strides toward addressing the interrelated problems of deforestation and abuse within its cattle sector. As discussed in previous chapters, the country has strong laws restricting forest destruction and prohibiting forced labor and invasions of Indigenous lands. It has also developed data tools that make it possible for people throughout—and beyond—cattle supply chains to assess whether any given farm is complying with these laws. In parallel, Brazil has developed a powerful tool for identifying which farms feed into which supply chains—the Animal Transit Guide (Guia de Trânsito Animal, GTA)—originally created for containing bovine disease.

What the country has not done, however, is establish a system that brings together compliance-assessment tools and the GTA transaction records in a manner—and at a scale—that could determine whether supply chains are free of non-compliant properties. As a result, while leading Brazilian meatpackers and tanneries have made progress in screening their direct suppliers, their indirect suppliers remain largely unmonitored. In practice, this means that currently—with limited exceptions—Brazilian beef and leather cannot be reliably considered free of illegal deforestation, forced labor, or Indigenous land invasions.

To address this gap, several state governments have developed batch traceability mechanisms that integrate GTA records with compliance-monitoring data (without making the GTAs fully public)—and some have plans to establish new systems for tracing individual cattle from birth until slaughter. These state-level initiatives reflect real ingenuity and commitment, and if pursued with care and rigor, they can deliver significant improvements in supply chain monitoring in some specific sectors and regions of production.

Yet these state-level initiatives also have significant limitations, and when it comes to saving the Amazon and Brazil's other forest biomes—and curbing the abuses that are fueling their destruction—they are, by themselves, insufficient. What's needed is a similar effort at the federal level to establish a national traceability and compliance monitoring system. And fortunately, thanks to the data tools already in place—and

new federal initiatives currently under development—Brazil has what it needs to construct such a system and make it operational in the near term.



Packed hides sit in front of a tannery owned by Durlicouros in Xinguara, Pará. Durlicouros buys hides from multiple slaughterhouses in the region. Credit: Fernando Martinho for CRI.

## *State Initiatives*

### State-level Batch Traceability and Monitoring Systems

The Pará state government, in partnership with the Federal University of Minas Gerais (UFMG), launched the Selo Verde (Green Seal) system in 2021—a public platform that provides environmental risk assessments of cattle supply chains while preserving the confidentiality of individual property data.

The system operates with government authorization to access GTA records, cross-referencing them with CARs and ten public databases—including the environmental embargo registry, the Dirty List, and the digitalized maps of Indigenous lands,

among others. It reconstructs supply chains—including up to five tiers of indirect suppliers—and flags whether cattle have passed through properties linked to illegal deforestation, embargoed areas, or other legal violations. It provides risk scores for each batch of cattle, indicating the presence of noncompliance within the supply chain, but it does not identify the specific upstream property responsible.

Under the system's classification:

- A “green seal” is assigned to properties with no cattle at risk.
- A “yellow seal” indicates less than 20% of the cattle at risk.
- A “red seal” reflects more than 20% at risk.

The Minas Gerais state government has adopted a similar traceability framework through the launch of the MG Green Seal (Selo Verde–MG), also developed in partnership with UFMG.<sup>260</sup> Drawing on the design of Pará's system, the Minas Gerais platform performs automated environmental diagnostics based on GTAs and other data. Unlike the Pará version, Minas Gerais doesn't publicly display a simple “seal color,” but properties are assigned a risk category (e.g. negligible, minor, or potential liability) through automated scoring. Other States are also in the process of developing Selo Verde platforms, reportedly including Acre, Espírito Santo, Maranhão, and Tocantins.<sup>261</sup>

## State-level Individual Traceability and Monitoring Systems

In December 2023, the state of Pará launched a program to track individually the entire cattle herd by December 2026. This program seeks to monitor each animal from birth to slaughter, ensuring greater transparency in the supply chain, meeting

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<sup>260</sup> “Plataforma Selo Verde integra 11 milhão de propriedades rurais e amplia,” Governo de Minas Gerais, accessed October 2025, <https://www.mg.gov.br/agricultura/noticias/plataforma-selo-verde-integra-11-milhao-de-propriedades-rurais-e-amplia>.

<sup>261</sup> “Governo e UFMG avançam na implementação da plataforma de conformidade ambiental Selo Verde Acre,” Agência AC, accessed October 2025, <https://agencia.ac.gov.br/governo-e-ufmg-avancam-na-implementacao-da-plataforma-de-conformidade-ambiental-selo-verde-acre/>; “Governo do Tocantins avança na implantação do CAR 2.0 e do Selo Verde com etapa de conciliação técnica,” Governo do Tocantins, accessed October 2025, <https://www.to.gov.br/semarh/noticias/governo-do-tocantins-avanca-na-implantacao-do-car-20-e-do-selo-verde-com-etapa-de-conciliacao-tecnica/azglgavvcz9>; “Selo Verde-ES garante transparência ambiental e abre portas para mercados exigentes,” Governo do Espírito Santo, accessed October 2025, <https://www.es.gov.br/Noticia/selo-verde-es-garante-transparencia-ambiental-e-abre-portas-para-mercados-exigentes>; “Apoyo a Espírito Santo (Brasil) para implementar la plataforma de trazabilidad Selo Verde,” AL-INVEST Verde, accessed October 2025, [https://alinvest-verde.eu/pt\\_pt\\_ao90/apoyo-a-espirito-santo-brasil-para-implementar-la-plataforma-de-trazabilidad-selo-verde/](https://alinvest-verde.eu/pt_pt_ao90/apoyo-a-espirito-santo-brasil-para-implementar-la-plataforma-de-trazabilidad-selo-verde/).

the demands of international markets and contributing to the reduction of illegal deforestation. To support small producers, who represent 67% of the state's breeders, the government is subsidizing identification devices. In addition, partnerships with organizations such as The Nature Conservancy (TNC) and companies in the sector, such as JBS, have been established to make the initiative viable. According to the Pará government, by the beginning of 2026 all the cattle moved between properties inside the state will need to have an ear tag. By 2027, all cattle within Pará are supposed to have their own ear tag.

Mato Grosso state has developed a proposal for an individual tracing program called “Passaporte Verde” (“Green Passport”) and submitted the proposal to the state legislature for approval.<sup>262</sup> The program will involve individual tracing of cattle from birth to slaughter.<sup>263</sup> It will be voluntary in the first four years after the law is approved, and then become mandatory (in 2029 if the law is approved this year).

## Limitations of State-level Systems

While the state-level tracing initiatives are a positive step forward, they face critical limitations that prevent them from fully addressing the problem of deforestation and other abuses in cattle supply chains. One is leakage. Unless and until all states have similar programs that work in a coordinated manner, producers in a state with a traceability program can transport their cattle to other states that don't have a similar tracing program. The existence of unmonitored markets in neighboring states will undercut the deterrent impact of the tracing mechanism in the state that establishes it.

Another limitation is a likely segmentation of the Brazilian cattle market, with beef and leather exporters concentrating their operations and sourcing entirely in those states that have established effective tracing mechanisms. While this segmentation could have beneficial effects to the extent it creates a “race to the top” among some states, it also risks simultaneously contributing to a “race to the bottom” among the other states that lack such mechanisms. In this scenario, law-abiding farmers in

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<sup>262</sup> Vida Rural MT. “Green Passport boosts sustainability in Mato Grosso livestock farming with new bill.” *Vida Rural MT*, July 18, 2025. <https://vidaruralmt.com.br/Publicacao.aspx?id=604633>.

<sup>263</sup> Caio Penido. “Passaporte Verde: Green Passport: Let's prove we have the most sustainable meat in the world.” *Instituto Mato-Grosense da Carne (Imac)*, May 16, 2025. <https://imac.agr.br/passaporte-verde-vamos-comprovar-que-temos-a-carne-mais-sustentavel-do-mundo/>.

states without credible traceability could lose access to export markets, while facing greater competition from non-compliant neighbors when selling to slaughterhouses supplying Brazilian markets that have less stringent sourcing requirements. And so long as cattle-driven deforestation continues largely unchecked in these states, it is likely to have profoundly detrimental consequences for the entire sector—and indeed the entire world—as it will contribute to driving Amazon rainforests heading toward the catastrophic tipping point predicted by climate scientists.

## *Federal Initiatives*

### Federal-level Compliance Monitoring Platform

Launched in December 2024 by Brazil's Ministry of Agriculture and Livestock (MAPA), the Agro Brazil + Sustainable program—referred by the acronym AB+S—is a federal initiative designed to help rural producers align with national legal requirements and emerging international demands—particularly in light of new deforestation-free sourcing regulations such as the European Union Deforestation Regulation (EUDR).<sup>264</sup>

At the core of the program is the AB+S platform, a public digital tool developed to evaluate the environmental and legal status of rural properties. It draws on data from federal and state agencies, private certification schemes, and public registries—including the same reference databases and deforestation tolerance thresholds used under the Beef TAC.<sup>265</sup> The platform verifies whether a property complies with land use and environmental regulations, making it easier for producers to demonstrate legal status and potentially access certified markets. Though not originally designed as a supply chain traceability tool, the platform can be used by producers to obtain compliance certificates, which they may share with downstream buyers or exporters.

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<sup>264</sup> Coalizão Brasil. “Mapeamento de Requisitos para a Plataforma Agro Brasil Sustentável (AB-S).” *Coalizão Brasil*, May 2025. <https://coalizaobr.com.br/wp-content/uploads/2025/05/Mapeamento-de-Requisitos-para-a-Plataforma-Agro-Brasil-Sustentavel-AB-S.pdf>.

<sup>265</sup> Climate Rights International interview with senior Ministry of Agriculture, Livestock and Food Supply (MAPA) official, Brasília, May 2025; Brazil, Ministério da Agricultura e Pecuária. “Portaria SDI/MAPA N° 721, de 2 de janeiro de 2025, Diário Oficial da União (3 January 2025),” *Government of Brazil*, accessed September 12, 2025. <https://www.gov.br/agricultura/pt-br/assuntos/sustentabilidade/programa-agro-brasil-sustentavel/legislacao>.



The platform was conceived primarily as a tool to support producers, not buyers. According to government officials, the intention is to empower rural producers with the information to which they are entitled.<sup>266</sup> As explained by one official who participated in the design, many large companies already have the resources to hire private firms to prepare environmental compliance dossiers for their suppliers—but in doing so, they effectively restrict those suppliers to exclusive contracts.<sup>267</sup> Small producers, by contrast, often lack access to the necessary data and tools to meet due diligence requirements. The platform aims to level the playing field by consolidating information that already exists across public systems, reducing the burden placed on smallholders seeking to meet the sourcing requirements of meatpackers and other potential buyers.

While the platform can be used by meatpackers and tanneries to assess the compliance of suppliers, it was not designed with industry-led compliance in mind. Currently, the platform only assesses the status of individual rural properties, not their entire supply chains. Moreover, participation is voluntary, and access to a property's compliance profile is only possible if the producer chooses to use the system.

## Federal-level Individual Traceability System

In December 2024, MAPA announced a national plan to establish an individual traceability program for cattle (Plano Nacional de Identificação Individual de Bovinos e Búfalos, or PNIB).<sup>268</sup> The plan was developed in consultation with private sector stakeholders, including producers and agribusiness associations.<sup>269</sup> While MAPA

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<sup>266</sup> Climate Rights International interviews with senior Ministry of Agriculture, Livestock and Food Supply (MAPA) officials, Brasília, May 2025.

<sup>267</sup> Climate Rights International interview with senior Ministry of Agriculture, Livestock and Food Supply (MAPA) official, Brasília, May 2025.

<sup>268</sup> Brazil, Ministério da Agricultura e Pecuária. "Minister Fávaro Launches National Plan for Individual Identification of Cattle and Buffalo." *Ministério da Agricultura e Pecuária*, December 17, 2024. <https://www.gov.br/agricultura/pt-br/assuntos/noticias/ministro-favaro-lanca-plano-nacional-de-identificacao-individual-de-bovinos-e-bufalos>.

<sup>269</sup> Confederação da Agricultura e Pecuária do Brasil (CNA). "CNA: Individual Traceability Plan for Cattle and Buffalo Will Reinforce Herd Health Control." *CNA Brasil*, December 18, 2024. <https://www.cnabrasil.org.br/noticias/para-cna-plano-de-rastreabilidade-individual-de-bovinos-e-bufalos-vai-reforçar-controle-da-sanidade-do-rebanho>.



already runs an individual traceability system called SISBOV, it operates on a much smaller scale than what is envisioned for PNIB.<sup>270</sup>

Under the new system, each animal will receive a unique electronic tag to record its life history, location, and movement—all linked to a centralized database.<sup>271</sup> This will allow for tracing with far greater precision and granularity than is possible through batch tracing—and, if implemented in a rigorous manner, represents the most effective means for eliminating non-compliant producers from the country's cattle supply chains.

However, implementation will take years. The agriculture ministry has set a phased timeline, with rollout beginning in 2027 and full national coverage only by 2032. Some Brazilian experts consulted by Climate Rights International raised concern that even these deadlines are unrealistic.<sup>272</sup>

More importantly, currently the PNIB is intended to serve exclusively—like the GTA system—for sanitary purposes.<sup>273</sup> It will improve on the GTA system by providing greater precision in tracing and allowing more targeted and efficient government responses to potential outbreaks of bovine disease. However, there are currently no announced plans to make it available to for monitoring compliance with laws protecting the environment, labor, or Indigenous rights.<sup>274</sup>

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<sup>270</sup> SISBOV was created in 2002 to meet EU sanitary and export requirements by tagging individual animals and certifying their origin. It was designed solely for sanitary compliance, applies only to animals kept on SISBOV-certified farms for at least 90 days prior to slaughter, and has been adopted by only a small portion of Brazil's producers.

<sup>271</sup> Brazil, Ministério da Agricultura e Pecuária. "Plano Nacional de Identificação Individual de Bovinos e Búfalos (PNIB) — Versão Final sem Assinaturas." *Government of Brazil*, September 2024. <https://www.gov.br/agricultura/pt-br/assuntos/sanidade-animal-e-vegetal/saude-animal/rastreabilidade-animal/PNIBVersofinalsemassinaturas.pdf>.

<sup>272</sup> Climate Rights International interviews with cattle sector experts, May 2025.

<sup>273</sup> Confederação da Agricultura e Pecuária do Brasil (CNA), "CNA: Individual Traceability Plan for Cattle and Buffalo Will Reinforce Herd Health Control." *Notícias Agrícolas*, December 19, 2024. <https://www.noticiasagricolas.com.br/noticias/boi/391027-para-cna-plano-de-rastreabilidade-individual-de-bovinos-e-bufalos-vai-reforçar-controle-da-sanidade-do-rebanho.html>.

<sup>274</sup> Climate Rights International interview with senior Ministry of Agriculture, Livestock and Food Supply (MAPA) official, Brasília, May 2025.

## National Framework on Human Rights and Business

In addition to these initiatives by the agricultural ministry, there is also currently a bill pending in the Brazilian congress that could play a major role in promoting more transparent and sustainable supply chains. Legislative Proposal (PL) 572/2022 would create a National Framework on Human Rights and Business with a mandatory human rights due diligence process for all companies, requiring them to identify, prevent, monitor, and remedy abuses, submit periodic reports, and comply with state oversight.<sup>275</sup> While motivated in part by disasters in other sectors, such as the Mariana and Brumadinho mining dam collapses,<sup>276</sup> its scope covers all industries, including agriculture and livestock.

Sanctions for non-compliance would include prohibiting subsidies or tax exemptions for violators; preventive embargoes; suspension or prohibition of operations for failure to implement preventive or reparative measures; loss of assets gained through abuse; exclusion from public incentives; significant fines; and, in extreme cases, loss of corporate control with possible transfer of the company to workers.<sup>277</sup> The bill emphasizes protections for affected groups, including full reparation and prior consultation rights, and specifically highlights the prevention of labor analogous to slavery.<sup>278</sup>

The scope of the proposed bill is broad, applying to “any entity” in a business’s global value chain, and while companies are required to conduct their own due diligence, the bill makes clear that state monitoring prevails over corporate self-

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<sup>275</sup> Helder Salomão et al, “Bill 572/2022: Establishes the National Framework Law on Business and Human Rights and Sets Guidelines for the Promotion of Public Policies on the Subject.” *Chamber of Deputies*, March 14, 2022.

[https://www.demarest.com.br/en/mpf-public-hearing-discusses-national-framework-on-business-and-human-rights/](https://www.camara.leg.br/proposicoesWeb/fichadetramitacao?idProposicao=2317904&fichaAmigavel=nao&utm; and Demarest Advogados, “MPF Public Hearing Discusses National Framework on Human Rights and Business.” <i>Demarest Advogados</i>, September 3, 2024. <a href=).

<sup>276</sup> Friends of the Earth, “Brazil has first bill to hold companies accountable for violations to the rights of affected populations.” *Stop Corporate Impunity*, April 5, 2022. <https://www.stopcorporateimpunity.org/brazil-has-first-bill-to-hold-companies-accountable-for-violations-to-the-rights-of-affected-populations/>.

<sup>277</sup> BHR Law, “Brazil Draft Bill Proposal No. 572, 2022.” *BHR Law*, March 29, 2022. <https://www.bhr-law.org/laws/brazil-draft-bill-proposal-572-2022>.

<sup>278</sup> Demarest Advogados, “MPF public hearing discusses National Framework on Human Rights and Business.” *Demarest Advogados*, September 3, 2024, <https://www.demarest.com.br/en/mpf-public-hearing-discusses-national-framework-on-business-and-human-rights/>.

reporting.<sup>279</sup> For the cattle industry, this would mean that meatpackers and tanneries have a direct legal obligation to ensure that no part of their sourcing, whether from direct or indirect suppliers, is linked to illegal deforestation, invasion of protected lands, or labor analogous to slavery.<sup>280</sup> This obligation would extend to every stage of cattle production, from breeding ranches and backgrounding farms to fattening operations and final slaughter, regardless of how many transactions separate the slaughterhouse from the point of violation. Under the bill's joint liability provisions, companies could not avoid responsibility by claiming they lacked visibility over upstream suppliers; if an abuse occurs anywhere in the chain, the company would be accountable for preventing it and for remedying harm when it happens.<sup>281</sup>

Brazil's slaughterhouses and tanneries would struggle to meet this standard using their existing due diligence practices and tools. Without an effective traceability system capable of monitoring indirect suppliers, they would struggle to produce the evidence of compliance that the proposed law would demand. However, if enacted, the law's requirements could provide a crucial impetus to support the establishment of such a system and to make effective use of it once in place.

## *The Way Forward*

Despite the shortcomings of existing government initiatives, Brazil does have the means to make unprecedented progress by establishing a national traceability and monitoring system—an overdue step essential to protecting its forests, upholding human rights, and securing the integrity and sustainability of its cattle sector.

It could begin by transforming the AB+S platform into a comprehensive monitoring tool, ensuring public access to compliance information on farms and their operators

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<sup>279</sup> BHR Law, "Brazil Draft Bill Proposal No. 572, 2022." *BHR Law*, March 29, 2022. <https://www.bhr-law.org/laws/brazil-draft-bill-proposal-572-2022>.

<sup>280</sup> Friends of the Earth, "Brazil has first bill to hold companies accountable for violations to the rights of affected populations." *Stop Corporate Impunity*, April 5, 2022. <https://www.stopcorporateimpunity.org/brazil-has-first-bill-to-hold-companies-accountable-for-violations-to-the-rights-of-affected-populations/>.

<sup>281</sup> Radwin, Maxwell, "Brazil Beef Industry Still Struggling with Deforestation from Indirect Suppliers, Survey Finds." *Mongabay*, November 26, 2024. <https://news.mongabay.com/2024/11/brazil-beef-industry-still-struggling-with-deforestation-from-indirect-suppliers-survey-finds/#:~:text=However%2C%20none%20of%20the%20132,if%20they%20contributed%20to%20deforestation;> and BHR Law, "Brazil Draft Bill Proposal No. 572, 2022." *BHR Law*, March 29, 2022. <https://www.bhr-law.org/laws/brazil-draft-bill-proposal-572-2022>.

while safeguarding legally protected personal data. Simultaneously, it should also establish robust national cattle traceability systems. In the short term, this means launching a batch traceability mechanism using harmonized GTA records from all states. In parallel, it should accelerate the rollout of the PNIB individual traceability system so that full animal-level tracing is achieved well before the current 2032 target. Crucially, small and medium producers must receive financial and technical support—such as subsidies for training, digital connectivity, and ear tags—to ensure they can access the AB+S platform and participate in the traceability systems.

Then, the government should move quickly to establish a national traceability and monitoring mechanism—initially by integrating the compliance data compiled in the AB+S platform with a harmonized national batch traceability system, and subsequently with the PNIB individual traceability system. An independent entity should be designated with full access to these data to assess whether, and to what extent, specific farms, slaughterhouses, and tanneries are linked to suppliers implicated in environmental or human rights harms, and to generate risk scores indicating the degree of supply chain contamination without disclosing the specific upstream parties involved. An oversight committee composed of industry representatives, civil society advocates, and academic experts should be tasked with defining the criteria for these assessments and auditing the entity's performance. The results should be made available through a public consultation platform that provides sufficient detail for accountability while safeguarding legally protected personal data.

Going forward, steps must be taken to strengthen the reliability of the datasets used for tracing and compliance monitoring within cattle supply chains. This includes validating CAR records to eliminate overlapping and fraudulent claims, improving GTA reporting to prevent cattle laundering, and ensuring the timely publication of IBAMA embargo registries, the “Dirty List” of slave labor, and Indigenous territory maps. In addition, the government should incorporate further official datasets—including labor inspection reports and information on Indigenous lands pending recognition—so that illegal deforestation, forced labor, and land invasions can be reliably detected.

Finally, the government should support the passage and effective implementation of the proposed National Framework on Human Rights and Business that would

require companies to identify, prevent, monitor, and remedy abuses throughout their supply chains—and ensure that they make full use of the national traceability and monitoring system to eliminate producers linked to abuses—including those fueling the destruction of the country's forests.



A truck laden with cattle leaves São Félix do Xingu. Large trucks like this make use of the lone highway that stretches 250km from Xinguara to São Félix do Xingu, where the paved highway stops but unpaved roads reach into the surrounding forest. Credit: Fernando Martinho for CRI.

## VIII. International, Regional and Domestic Law and Standards

On July 3, 2025, the Inter-American Court of Human Rights issued an advisory opinion on the obligation of states with respect to climate change. In reaching its decision, the court relied on both the American Convention on Human Rights and international law more broadly. The opinion makes clear that Brazil, as a party to the American Convention on Human Rights, and other international treaties, should:

- mitigate greenhouse gas (GHG) emissions by adopting policies and regulations that set clear mitigation targets, monitor their implementation, and regulate both its own actions and those of highly GHG polluting corporations.
- adopt legislative and administrative frameworks that require business enterprises to identify, prevent, mitigate and account for climate-related human rights risks.
- require companies to conduct human rights and climate due diligence across their value chains, mandate public disclosure of emissions, enforce emission reduction actions, require alignment with national climate targets, and address greenwashing and undue political influence.
- supervise and control high-impact climate activities, including land-use changes, agro-industrial activities, and deforestation, through mitigation policies and concrete measures.
- engage in enhanced due diligence before authorizing activities that could significantly harm the climate system/
- investigate and punish violations by climate polluting corporations and ensure reparations for harms, with higher scrutiny for companies with greater historical and current GHG emissions, including fossil fuel companies.
- protect the rights of nature, since nature should not be seen exclusively as an object of property and a source of exploitation.
- ensure a safe and enabling environment for defenders to operate without threats, restrictions, violence, or the criminalization of their work. This includes preventing and investigating threats or attacks, and protecting defenders against arbitrary detention, online threats, and SLAPPs (Strategic Lawsuit Against Public Participation).
- recognize and support Indigenous Peoples' self-determination in climate-related decision making, while integrating the knowledge of Indigenous Peoples into



climate and environmental strategies, ensuring fair benefit sharing, and protecting the full exercise of their procedural rights, including the right to Free, Prior and Informed Consent.

## *Workers' Rights*

### Prohibition on Forced Labor

Forced labor is expressly prohibited by ILO Convention No. 29, which has been ratified by 181 countries, including Brazil.<sup>282</sup> The Convention defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”<sup>283</sup>

According to the ILO, the systematic and deliberate withholding of wages, used by abusive employers to compel workers to stay in a job out of fear of losing accrued earnings, is the most common form of coercion, but other forms can include abuse of vulnerability through threat of dismissal, forced confinement, physical and sexual violence, and the deprivation of basic needs.<sup>284</sup>

Because forced labor can be difficult to detect, in large part due to the vulnerability and invisibility of many victims, the ILO has developed 11 operational indicators to help “identify persons who are possibly trapped in a forced labor situation, and who may require urgent assistance.” These indicators include abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt

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<sup>282</sup> International Labour Organization, “Forced Labour Convention, 1930 (No. 29).” *International Labour Organization*, adopted June 28, 1930; entered into force May 1, 1932, accessed September 12, 2025. [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:11300:0::NO::P11300\\_INSTRUMENT\\_ID:312174](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11300:0::NO::P11300_INSTRUMENT_ID:312174).

<sup>283</sup> International Labour Organization, “Forced Labour Convention, 1930 (No. 29).” *International Labour Organization*, adopted June 28, 1930; entered into force May 1, 1932, accessed June 27, 2025. [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029); See also International Labour Organization, “Hard to See, Harder to Count: Handbook on Forced Labour Surveys.” *International Labour Organization*, 2024. [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed\\_norm/@ipec/documents/publication/wcms\\_914768.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@ipec/documents/publication/wcms_914768.pdf).

<sup>284</sup> International Labour Organization, “Global Estimates of Modern Slavery: Forced Labour and Forced Marriage.” *International Labour Organization*, September 2022, <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>.

bondage, abusive working and living conditions, and excessive overtime.<sup>285</sup> The ILO explicitly states that, while extremely poor working and living conditions alone do not prove the existence of forced labor—since people may "voluntarily" accept such conditions due to lack of employment alternatives—they should be considered a "warning sign" of the possible presence of coercion that is preventing workers from leaving their jobs.<sup>286</sup>

## Right to a Safe and Healthy Working Environment

The right to occupational health and safety is a critical extension of the rights to health, life, and a healthy environment, and is protected under international law. The International Covenant on Economic, Social and Cultural Rights (ICESCR), which Brazil ratified in 1992, recognizes the right to just and favorable conditions of work.<sup>287</sup> The ICESCR indicates that this right applies to "all workers in all settings," including self-employed workers, migrant workers, and those in the informal sector.<sup>288</sup> In order to protect and uphold this right, states are required to adopt national policies to minimize hazards in the workplace and require businesses to provide access to safe drinking water and adequate sanitation facilities.<sup>289</sup>

The right to a safe and healthy working environment is further protected by the International Labour Organization under the Declaration of Fundamental Principles

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<sup>285</sup> International Labour Organization, "ILO Indicators of Forced Labour," *ILO*, Oct.1, 2012. <https://www.ilo.org/publications/ilo-indicators-forced-labour>.

<sup>286</sup> Ibid, p. 23.

<sup>287</sup> OHCHR, International Covenant on Economic, Social and Cultural Rights." *United Nations Office of the High Commissioner for Human Rights*, adopted December 16, 1966; entered into force January 3, 1976, accessed September 12, 2025. [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/treaty.aspx?treaty=cescr&lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/treaty.aspx?treaty=cescr&lang=en).

<sup>288</sup> United Nations, "International Covenant on Economic, Social and Cultural Rights." *United Nations Office of the High Commissioner for Human Rights*, adopted December 16, 1966; entered into force January 3, 1976; and [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/treaty.aspx?treaty=cescr&lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/treaty.aspx?treaty=cescr&lang=en); and Committee on Economic, Social and Cultural Rights. "General Comment No. 23 on the Right to Just and Favourable Conditions of Work." *United Nations*, 2016. <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>.

<sup>289</sup> A/RES/64/292, "The Human Right to Water and Sanitation," adopted by the UN General Assembly on July 28, 2010. [https://digitallibrary.un.org/record/687002/files/A\\_RES\\_64\\_292-EN.pdf](https://digitallibrary.un.org/record/687002/files/A_RES_64_292-EN.pdf); International Labour Organization. "WASH@Work: A Self-Training Handbook." *International Labour Organization*, 2016. [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_dialogue/%40sector/documents/publication/wcms\\_535058.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40sector/documents/publication/wcms_535058.pdf).

and Rights at Work (1988, amended 2022).<sup>290</sup> The International Labor Organization is a United Nations agency dedicated to promoting social and economic justice through the advancement of international labor standards and rights. Brazil was a founding member of the ILO and has ratified eight of the ten fundamental ILO conventions, which are legally-binding.<sup>291</sup>

The Declaration of Fundamental Principles and Rights at Work “contains the core principles that ILO Member States are called upon to respect by virtue of their membership even if they have not ratified the ILO’s Conventions in which they are expressed.”<sup>292</sup>

## *Rights of Indigenous Peoples*

States are obligated under international human rights law to protect the rights of Indigenous people through their regulatory frameworks and ensure that victims of abuses have access to redress. This includes the rights of Indigenous people to maintain their cultural institutions and traditional livelihoods.

Rooted in fundamental rights enshrined by international human rights conventions, including the rights to self-determination and to be free from racial discrimination, the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) has the support of all but nine countries, and is increasingly treated as a mandatory minimum standard.<sup>293</sup> Brazil voted in favor of the declaration.

The UN Declaration recognizes Indigenous peoples’ claims to land and resources that they possess based on “traditional ownership, traditional occupation or use, or

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<sup>290</sup> International Labour Organization, “ILO Declaration on Fundamental Principles and Rights at Work.” *International Labour Organization*, adopted June 1998; amended June 2022. [https://www.ilo.org/sites/default/files/2024-04/ILO\\_1998\\_Declaration\\_EN.pdf](https://www.ilo.org/sites/default/files/2024-04/ILO_1998_Declaration_EN.pdf).

<sup>291</sup> International Labour Organization, “ILO Country Legal Database: Brazil.” *International Labour Organization*, accessed September 12, 2025. [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:11200:0::NO::P11200\\_COUNTRY\\_ID:102571](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102571).

<sup>292</sup> International Labour Organization, “ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up.” *International Labour Organization*, Preface, June 10, 2022. [https://www.ilo.org/sites/default/files/2024-04/ILO\\_1998\\_Declaration\\_EN.pdf](https://www.ilo.org/sites/default/files/2024-04/ILO_1998_Declaration_EN.pdf)

<sup>293</sup> United Nations, “United Nations Declaration on the Rights of Indigenous Peoples” (A/RES/61/295), adopted September 13, 2007. *United Nations*, accessed September 12, 2025. <https://social.desa.un.org/issues/indigenous-peoples/united-nations-declaration-on-the-rights-of-indigenous-peoples>.

which they have otherwise acquired.”<sup>294</sup> States “shall provide effective mechanisms for prevention of, and redress for, any action which has the aim or effect of dispossessing [Indigenous peoples and individuals] of their land, territories or resources.”<sup>295</sup>

Similarly, the UN Committee on Economic, Social and Cultural Rights, which provides authoritative interpretation of the ICESCR, has stated that governments should “take measures to recognize and protect the rights of indigenous people to own, develop, control and use their communal land, territories and resources.”<sup>296</sup>

ILO Convention 169, which Brazil ratified in 2002,<sup>297</sup> states that Indigenous Peoples:

shall have the right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual wellbeing and the lands they occupy or otherwise use, and to exercise control, to the extent possible, over their own economic, social, and cultural development. In addition, they shall participate in the formulation, implementation and evaluation of plans and programmes for national and regional development which may affect them directly.<sup>298</sup>

## Cultural Rights

The International Covenant on Civil and Political Rights (ICCPR) recognizes the right to self-determination and rights of minorities to their own culture.<sup>299</sup> The right to culture has been interpreted to require legal protection for particular ways of life

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<sup>294</sup> UNDRIP, art. 26.

<sup>295</sup> UNDRIP, art. 8(2)(a).

<sup>296</sup> UN Committee on Economic, Social and Cultural Rights, “General Comment No. 21: Right of Everyone to Take Part in Cultural Life.” *United Nations*, December 21, 2009. U.N. Doc. E/C.12/GC/21, para. 36. <https://digitallibrary.un.org/record/679354?v=pdf>.

<sup>297</sup> International Labour Organization, “Ratifications of C169 — Indigenous and Tribal Peoples Convention, 1989 (No. 169).” *International Labour Organization*, accessed September 19, 2025. [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=1000:11300:0::NO::P11300\\_INSTRUMENT\\_ID:312314](https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11300:0::NO::P11300_INSTRUMENT_ID:312314).

<sup>298</sup> International Labour Organization, “ILO Convention No. 169 Concerning Indigenous and Tribal Peoples in Independent Countries, adopted June 27, 1989; entered into force September 5, 1991, art. 7,” *International Labour Organization*, accessed September 11, 2023, [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C169](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169).

<sup>299</sup> United Nations, “International Covenant on Civil and Political Rights.” *United Nations*, adopted December 16, 1966; entered into force March 23, 1976, arts. 1 and 27. <https://www.ohchr.org/sites/default/files/ccpr.pdf>.

negatively impacted by changes to the natural environment, including such traditional activities as fishing or hunting.<sup>300</sup>

Under the UN Declaration on the Rights of Indigenous Peoples,

Indigenous peoples have the right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities.<sup>301</sup>

States have the duty to provide effective mechanisms to prevent and provide redress for any actions that deprive Indigenous peoples of “their integrity as distinct peoples, or of their cultural values” or dispossess them of their “lands, territories or resources.”<sup>302</sup>

## *Right to a Clean, Healthy, and Sustainable Environment*

Both the Inter-American Court of Human Rights<sup>303</sup> and the International Court of Justice<sup>304</sup> have recently found, in landmark advisory opinions, that all people have the right to a clean, healthy and sustainable environment.

The opinions confirm what was a growing consensus. In 2022, the UN General Assembly adopted a resolution declaring access to a clean, healthy, and sustainable environment to be a universal human right. The resolution highlighted the way in which a healthy environment is critical to the enjoyment of numerous other human

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<sup>300</sup>United Nations Human Rights Committee, “CCPR General Comment No. 23: Article 27 (Rights of Minorities),” para. 7. *United Nations Human Rights Committee*, April 8, 1994. <https://www.refworld.org/docid/453883fc0.html>.

<sup>301</sup> United Nations, “United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).” *United Nations*, adopted September 13, 2007, art. 20(1). <https://social.desa.un.org/issues/indigenous-peoples/united-nations-declaration-on-the-rights-of-indigenous-peoples>.

<sup>302</sup> United Nations, “United Nations Declaration on the Rights of Indigenous Peoples” (A/RES/61/295), *United Nations*, adopted September 13, 2007, art. 8(2). <https://social.desa.un.org/issues/indigenous-peoples/united-nations-declaration-on-the-rights-of-indigenous-peoples>.

<sup>303</sup> International Court of Human Rights, “Advisory Opinion OC-32/35: Climate Emergency and Human Rights.” *Inter-American Court of Human Rights*, adopted May 29, 2025; notified July 3, 2025. <https://jurisprudencia.corteidh.or.cr/en/vid/opinion-consultiva-no-32-1084981967>.

<sup>304</sup> United Nations General Assembly, “The Human Right to a Clean, Healthy and Sustainable Environment” (A/RES/76/300), para 373, *United Nations*, July 28, 2022. <https://docs.un.org/en/A/RES/76/300>.

rights.<sup>305</sup> Brazil voted in favor of the resolution. The UN Human Rights Council has also called on all member states to take steps to “respect, protect, and fulfil” the right to a healthy environment.<sup>306</sup>

Brazil is a signatory to the 1988 Additional Protocol to the American Convention on Human Rights (the Protocol of San Salvador), which states that “everyone shall have the right to live in a healthy environment.”<sup>307</sup>

The right is also protected in the Brazil Constitution, which states that

All have the right to an ecologically balanced environment, which is an asset of common use and essential to a healthy quality of life, and both the Government and the community shall have the duty to defend and preserve it for present and future generations.<sup>308</sup>

The Brazil Supreme Court has held that the failure to take action to mitigate climate change violates the constitutional right to a healthy environment and Brazil’s international commitments under the Paris Agreement.<sup>309</sup> According to the court, “there is no legally valid option of simply omitting to combat climate change.”<sup>310</sup> In ruling that Brazil’s failure to operationalize its National Climate Fund violated the Constitution, the court cited increased deforestation rates as evidence that Brazil was failing to adequately combat climate change, noting that “in the case of Brazil,

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<sup>305</sup> United Nations General Assembly, “The Human Right to a Clean, Healthy and Sustainable Environment” (A/RES/76/300). *United Nations*, July 28, 2022. <https://docs.un.org/en/A/RES/76/300>.

<sup>306</sup> United Nations Human Rights Council. “The Human Right to a Clean, Healthy and Sustainable Environment” (A/HRC/RES/48/13), *United Nations Human Rights Council*, adopted October 8, 2021. <https://docs.un.org/en/A/HRC/RES/48/13>.

<sup>307</sup> Organization of American States, “Additional Protocol to the American Convention on Human Rights in the Area of Economic, Social and Cultural Rights (Protocol of San Salvador), 1988.” *Organization of American States*. [https://www.oas.org/dil/1988\\_percent20Additional\\_percent20Protocol\\_percent20to\\_percent20the\\_percent20American\\_percent20Convention\\_percent20on\\_percent20Human\\_percent20Rights\\_percent20in\\_percent20the\\_percent20Area\\_percent20of\\_percent20Economic\\_percent20Social\\_percent20and\\_percent20Cultural\\_percent20Rights\\_percent20\(Protocol\\_percent20of\\_percent20San\\_percent20Salvador\).pdf](https://www.oas.org/dil/1988_percent20Additional_percent20Protocol_percent20to_percent20the_percent20American_percent20Convention_percent20on_percent20Human_percent20Rights_percent20in_percent20the_percent20Area_percent20of_percent20Economic_percent20Social_percent20and_percent20Cultural_percent20Rights_percent20(Protocol_percent20of_percent20San_percent20Salvador).pdf).

<sup>308</sup> Brazil, “*Constitution of the Federative Republic of Brazil of 1988*,” art. 225. *Government of Brazil, 1988*. [https://www.planalto.gov.br/ccivil\\_03/constituicao/constituicao.htm](https://www.planalto.gov.br/ccivil_03/constituicao/constituicao.htm).

<sup>309</sup> Brazil, Supreme Federal Court. “ADPF-708 Decision: Climate Emergency and the Urgency of Mitigation Measures.” *Supreme Federal Court*, July 1, 2022. Unofficial English translation available at [https://climatecasechart.com/wp-content/uploads/non-us-case-documents/2022/20220701\\_ADPF-708\\_decision.pdf](https://climatecasechart.com/wp-content/uploads/non-us-case-documents/2022/20220701_ADPF-708_decision.pdf).

<sup>310</sup> *Ibid*, para. 17.



land use change and deforestation are among the main activities responsible for GHG emissions.”<sup>311</sup>

## *Right to be Protected from Foreseeable Environmental Harms to Human Rights*

Governments have an international human rights obligation to protect populations from foreseeable environmental harms to their human rights, including those linked to climate change.

As the International Court of Justice stated in its recent advisory opinion:

In order to guarantee the effective enjoyment of human rights, States must take measures to protect the climate system and other parts of the environment. These measures may include, inter alia, taking mitigation and adaptation measures, with due account given to the protection of human rights, the adoption of standards and legislation, and the regulation of the activities of private actors. Under international human rights law, States are required to take necessary measures in this regard.<sup>312</sup>

Similarly, the Inter-American Court of Human Rights stated, in its recent advisory opinion, that:

States are obligated to guarantee human rights when they are, or should be, aware of the possibility that the acts or omissions of their agents or of private individuals may create a risk of severe and irreversible damage, within or outside their territory, even when they lack absolute certainty in this regard.<sup>313</sup>

The Inter-American Commission on Human Rights has similarly noted:

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<sup>311</sup> Ibid, para. 11, 14.

<sup>312</sup> International Court of Justice, “Obligations of States in Respect of Climate Change” (Advisory Opinion, Case No. 187), para. 403. *International Court of Justice*, July 23, 2025. <https://www.icj-cij.org/case/187>.

<sup>313</sup> International Court of Human Rights, “Advisory Opinion OC-32: Climate Emergency and Human Rights,” para. 224. *Inter-American Court of Human Rights*, May 29, 2025. <https://jurisprudencia.corteidh.or.cr/en/vid/opinion-consultiva-no-32-1084981967>.

States must comply with their international obligations to protect and guarantee the enjoyment and exercise of human rights by all persons who, as a result of environmental impacts, including those attributable to climate change, are significantly affected both individually and collectively.<sup>314</sup>

Focusing on climate change, the UN Committee on Economic, Social and Cultural Rights (CESCR) has warned that “a failure to prevent foreseeable human rights harms caused by climate change, or a failure to mobilize the maximum available resources in an effort to do so, could constitute a breach” of their human rights obligations.<sup>315</sup>

Governments thus have a clear obligation to take legal, regulatory, or legislative steps to prevent foreseeable threats to human rights by businesses and other private actors, including threats due to deforestation, fossil fuel emissions, pollution, and other environmental harm.<sup>316</sup>

### *Obligation to Cooperate, Including Financial Assistance*

The Inter-American Court of Human Rights, in its recent advisory opinion, stressed the obligation of states to cooperate to address the complex issue of climate change. Cooperation is not limited to mitigation and adaptation measures but encompasses “all necessary measures to respond comprehensively to the climate emergency.”<sup>317</sup>

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<sup>314</sup> Inter-American Commission on Human Rights, “Climate Emergency: Scope of Inter-American Human Rights Obligations” (Resolution 3/2021), para. 9. *Inter-American Commission on Human Rights*, December 31, 2021. [https://www.oas.org/en/iachr/decisions/pdf/2021/resolucion\\_3-21\\_ENG.pdf](https://www.oas.org/en/iachr/decisions/pdf/2021/resolucion_3-21_ENG.pdf).

<sup>315</sup> Committee on Economic, Social, and Cultural Rights, “Climate change and the International Covenant on Economic, Social, and Cultural Rights,” para. 6. *Committee on Economic, Social, and Cultural Rights*, October 8, 2018. <https://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=23691&LangID=E>.

<sup>316</sup> With respect to the State party’s position that article 6 (1) of the Covenant does not obligate it to prevent foreseeable loss of life from climate change, the Committee recalls that the right to life cannot be properly understood if it is interpreted in a restrictive manner and that the protection of that right requires States parties to adopt positive measures to protect the right to life. United Nations Human Rights Committee. “Views Adopted by the Committee under Article 5(4) of the Optional Protocol, Concerning Communication No. 3624/2019,” UN Doc. CCPR/C/135/D/3624/2019, para. 8.3. *United Nations Human Rights Committee*, September 22, 2022. [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2f135%2fD%2f3624%2f2019&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2f135%2fD%2f3624%2f2019&Lang=en); and United Nations Human Rights Committee. “Views Adopted by the Committee under Article 5(4) of the Optional Protocol, Concerning Communication No. 2751/2016,” UN Doc. CCPR/C/126/D/2751/2016, paras. 7.3–7.4. *United Nations Human Rights Committee*, 2019.

<sup>317</sup> International Court of Human Rights, “Advisory Opinion OC-32: Climate Emergency and Human Rights,” para. 259. *Inter-American Court of Human Rights*, May 29, 2025. <https://jurisprudencia.corteidh.or.cr/en/vid/opinion-consultiva-no-32-1084981967>.

The obligation to cooperate entails, among other things: (i) financing and economic aid to least developed countries to contribute to the just transition; (ii) technical and scientific cooperation that involves communication and shared enjoyment of the benefits of progress; (iii) the implementation of mitigation, adaptation, and reparation measures that may benefit other States; and (iv) the establishment of international forums and the development of joint international policies.<sup>318</sup>

Similarly, the International Court of Justice highlighted the binding nature of the Paris Agreement obligations for developed countries to provide financial assistance to assistance to help developing countries with respect to both mitigation and adaptation.<sup>319</sup>

## *Human Rights and Environmental Responsibilities and Obligations of Companies*

### UN Guiding Principles on Business and Human Rights

The UN Guiding Principles on Business and Human Rights (UNGPs), endorsed by the UN Human Rights Council in 2011, established internationally recognized standards for business and state responsibilities related to preventing and addressing human rights abuses linked to business activities.<sup>320</sup> The Guiding Principles mandate that businesses avoid causing or contributing to human rights abuses through their activities and "take appropriate steps" to address any adverse impacts that arise. This obligation extends to foreseeable human rights risks linked to climate change, as explicitly indicated by the Working Group on the issue of human rights and transnational corporations and other business enterprises in 2023.<sup>321</sup>

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<sup>318</sup> Ibid, para. 262.

<sup>319</sup> Article 4, paragraph 4, of the UNFCCC provides that Annex II parties "shall" assist the developing country parties that are particularly vulnerable to the adverse effects of climate change in meeting the costs of adaptation to those adverse effects. This is a legally binding obligation on all parties that are listed in Annex II. International Court of Justice. "Obligations of States in Respect of Climate Change" (Advisory Opinion, Case No. 187), para. 403. *International Court of Justice*, July 23, 2025. <https://www.icj-cij.org/case/187>.

<sup>320</sup> United Nations, "Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework." *Office of the United Nations High Commissioner for Human Rights*, 2011. [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf).

<sup>321</sup> United Nations Working Group on Business and Human Rights, "Information Note on Climate Change and the Guiding Principles on Business and Human Rights." *United Nations Human Rights Office*, June

Under the framework established by the Guiding Principles, businesses are required to “seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships.”<sup>322</sup> This applies even in the instance that they have not contributed to those impacts.<sup>323</sup>

To fulfill these responsibilities, companies must implement human rights due diligence processes, which include: “assessing actual and potential impacts and acting upon findings, tracking responses, and communicating how impacts are addressed.” This process must also encompass environmental and climate-related harms, recognizing their direct impact on fundamental rights, such as the right to health and the right to a healthy environment.<sup>324</sup> When a company identifies adverse impacts within its value chain, it should use its “leverage to prevent or mitigate the adverse impact.”<sup>325</sup> If unable to do so, the company should consider ending the business relationship.<sup>326</sup>

## OECD’s Guidelines for Multinational Enterprises

The OECD’s Guidelines for Multinational Enterprises similarly provide that businesses should carry out risk-based due diligence to identify, prevent and mitigate actual and potential adverse impacts on human rights and the

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2023. <https://media.business-humanrights.org/media/documents/Information-Note-Climate-Change-and-UNGPs.pdf>.

<sup>322</sup> United Nations Human Rights Office of the High Commissioner, “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework.” *Office of the United Nations High Commissioner for Human Rights*, 2011.

[https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf).

<sup>323</sup> Ibid.

<sup>324</sup> United Nations Working Group on the issue of human rights and transnational corporations and other business enterprises. “Information Note on Climate Change and the Guiding Principles on Business and Human Rights.” *Working Group on the issue of human rights and transnational corporations and other business enterprises*, June 2023. <https://media.business-humanrights.org/media/documents/Information-Note-Climate-Change-and-UNGPs.pdf>.

<sup>325</sup> United Nations Human Rights Office of the High Commissioner, “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework.” *Office of the United Nations High Commissioner for Human Rights*, 2011.

[https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf).

<sup>326</sup> Ibid. principle 19(b). *See also* United Nations Human Rights Special Procedures, Working Group on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises, “Information Note on Climate Change and the Guiding Principles on Business and Human Rights.” para. 17(g), *United Nations*, June 2023. <https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/Information-Note-Climate-Change-and-UNGPs.pdf>.

environment, including deforestation.<sup>327</sup> While Brazil is not a member of the OECD, it is considered a key partner,<sup>328</sup> and many companies operating inside its borders or sourcing from its supply chains are based in OECD member countries.

Under the OECD Guidelines, an enterprise “causes” an adverse impact if its activities on their own are sufficient to result in the adverse impact; it “contributes” if “its activities, in combination with the activities of other entities cause the impact, or if the activities of the enterprise cause, facilitate or incentivize another entity to cause an adverse impact.”<sup>329</sup> Just like in the UN Guiding Principles, even if the enterprise does not cause or contribute to the impact, it still has a responsibility to prevent and mitigate impacts directly linked to a “business relationship,” including “entities in the supply chain which supply products or services that contribute to the enterprise’s own operations, products or services.”<sup>330</sup>

The guidelines also call on enterprises to operate in alignment with internationally agreed upon goals on climate change, including expectations for mitigation as well as adaptation.<sup>331</sup> The guidelines recommend that companies and financial institutions take steps to understand and respond to climate impacts associated with their operations, products, services, and investments.<sup>332</sup>

## EU Forced Labour Regulation

The European Union Forced Labour Regulation (FLR), adopted in 2024, prohibits any product made with forced or compulsory labor at any stage of its production chain from being placed on or exported from the EU market.<sup>333</sup> The regulation applies

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<sup>327</sup> Organisation for Economic Co-operation and Development (OECD), “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,” Chapters IV and VI, *OECD Publishing*, 2023. [https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_a0b49990.html](https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990.html).

<sup>328</sup> OECD, “Brazil.” *Organisation for Economic Co-operation and Development*, accessed September 12, 2025. <https://www.oecd.org/en/countries/brazil.html>.

<sup>329</sup> OECD, “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,” para. 68, p. 36. *Organisation for Economic Co-operation and Development*, June 2023. [https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_a0b49990/81f92357-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990/81f92357-en.pdf).

<sup>330</sup> *Ibid.* para. 17, p. 18.

<sup>331</sup> *Ibid.* Chapter VI.

<sup>332</sup> *Ibid.* Commentary on Chapter VI, para. 66, p. 35.

<sup>333</sup> European Parliament and Council, “Regulation (EU) 2024/3015 on Prohibiting Products Made with Forced Labour on the Union Market and Amending Directive (EU) 2019/1937.” *Official Journal of the European Union*,

equally to imports, EU-made goods, and exports, and will become fully enforceable in December 2027.<sup>334</sup> Under the regulation, even the partial use of forced labor by suppliers of raw materials—such as hides from ranches in Brazil—renders the final leather product prohibited.<sup>335</sup> Enforcement will follow a risk-based model: authorities can open investigations based on a “substantiated concern,” and if violations are found, goods can be seized, withdrawn, or destroyed.<sup>336</sup> While the burden of proof lies with regulators, operators must be prepared to demonstrate that they have undertaken adequate due diligence across their supply chains.<sup>337</sup>

## EU Deforestation Regulation

The European Union Deforestation Regulation (EUDR), adopted in 2023, prohibits the import and sale of commodities on EU markets linked to deforestation and forest degradation and requires companies to prove that goods are legally produced and fully traceable back to the land where they were sourced. The rules take effect on December 30, 2026.

Under the regulation, raw hides and leather imported to the European Union directly from Brazil must be deforestation-free, legally produced under Brazilian law, and fully traceable to the farms where the cattle were raised.<sup>338</sup> (The regulation does not cover imports of finished products made with Brazilian leather outside the European Union.) European brand-owners and importers must collect geolocation data for

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November 27, 2024, art. 3. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202403015#:~:text=Prohibition%20of%20products%20made%20with,shall%20they%20export%20such%20products](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202403015#:~:text=Prohibition%20of%20products%20made%20with,shall%20they%20export%20such%20products).

<sup>334</sup> Littenberg, M. R., & Elliott, S. “EU Forced Labor Regulation Published in Official Journal — Beginning the Countdown to Compliance.” Ropes & Gray, December 20, 2024.

<https://www.ropesgray.com/en/insights/viewpoints/102jrun/eu-forced-labor-regulation-published-in-official-journal-beginning-the-countdown>.

<sup>335</sup> Crowell & Moring LLP, “The EU Forced Labor Regulation — A Legal Breakdown.” *Crowell & Moring LLP*, March 26, 2024. <https://www.crowell.com/en/insights/client-alerts/the-eu-forced-labor-regulation-a-legal-breakdown>.

<sup>336</sup> European Parliament and Council. “Regulation (EU) 2024/3015 on Prohibiting Products Made with Forced Labour on the Union Market and Amending Directive (EU) 2019/1937.” *Official Journal of the European Union*, November 27, 2024. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202403015#:~:text=bring%20to%20an%20end%20the](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202403015#:~:text=bring%20to%20an%20end%20the).

<sup>337</sup> Crowell & Moring LLP, “The EU Forced Labor Regulation — A Legal Breakdown.” *Crowell & Moring LLP*, March 26, 2024. <https://www.crowell.com/en/insights/client-alerts/the-eu-forced-labor-regulation-a-legal-breakdown>.

<sup>338</sup> European Commission, “Application of EUDR Regulation on Deforestation-Free Products Delayed Until December 2025.” *European Commission – Access to Markets*, June 2023. <https://trade.ec.europa.eu/access-to-markets/en/news/application-eudr-regulation-deforestation-free-products-delayed-until-december-2025#:~:text=Commodities%20and%20products%20covered%20by,the%20following%20conditions%20are%20fulfilled>.



each ranch or pasture in an animal's life, confirm legality under Brazilian laws, and submit a due diligence statement with every shipment.<sup>339</sup> If any link fails to provide verifiable data, the brand faces penalties that may include fines, confiscation of products and respective revenues, and a temporary ban on the import and sale of covered products.<sup>340</sup>

## EU Corporate Sustainability Due Diligence Directive

The EU Corporate Sustainability Due Diligence Directive is a newly adopted, though not yet effective, European Union regulation that aims to hold companies accountable for human rights violations and environmental harms in their global supply chains.<sup>341</sup> The directive requires businesses to conduct human rights and environmental due diligence within their global operations and supply chains to eliminate, mitigate, and remediate adverse impacts.<sup>342</sup> The provisions are to be enforced through “effective, proportionate and dissuasive penalties” for non-compliance.<sup>343</sup> In addition, the directive creates an obligation for large companies to adopt and implement transition plans for climate mitigation in alignment with the Paris Agreement, though it does not include sanctions for companies that fail to meet established emissions reduction targets.<sup>344</sup>

## German Supply Chain Due Diligence Act

Germany's Supply Chain Due Diligence Act, which took effect on January 1, 2023, imposes a binding obligation on companies to establish, implement, and update due diligence procedures in their supply chains to improve compliance with specified

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<sup>339</sup> Official Journal of the European Union, “Guidance Document for Regulation (EU) 2023/1115 on the Making Available on the Union Market and the Export from the Union of Certain Commodities and Products Associated with Deforestation and Forest Degradation.” *Official Journal of the European Union*, C/2025/4524, August 12, 2025. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C\\_202504524](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C_202504524).

<sup>340</sup> Lopes, Cristina Leme et al, “Brazilian Environmental Policies and the New European Union Regulation for Deforestation-Free Products: Opportunities and Challenges.” *Climate Policy Initiative*, October 3, 2023. <https://www.climatepolicyinitiative.org/publication/brazilian-environmental-policies-and-the-new-european-union-regulation-for-deforestation-free-products-opportunities-and-challenges/#:~:text=Sanctions>.

<sup>341</sup> European Commission, “Corporate Sustainability Due Diligence.” *European Commission*, July 25, 2024. [https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en).

<sup>342</sup> Ibid.

<sup>343</sup> Ibid.

<sup>344</sup> Human Rights Watch, “Questions and Answers: New EU Law on Corporate Value Chains,” *Human Rights Watch*, May 24 2024, <https://www.hrw.org/news/2024/05/24/qu>.

human rights, including negative impacts on the environment that affect people.<sup>345</sup> The act defines “supply chain” to include all steps in Germany and abroad which are required to produce the products and provide the services of a company – starting from the extraction of raw materials up to the delivery to the end customer.<sup>346</sup>

The law currently applies to German or foreign companies with at least 1000 employees in Germany.

The law requires these companies not only to identify and assess third parties’ impact on specified human rights and the environment, but to prevent and remedy any adverse impacts. Eligible companies must publish an annual report which spells out their approach to identifying and mitigating risks. Violations of the law are punishable by penalties of up to two percent of a company’s annual average sales.

## French Due Diligence Law

In 2017, France passed a new corporate due diligence law, called the duty of vigilance law, imposing a legally binding obligation on large parent companies to identify, prevent, mitigate and redress human rights and environmental impacts resulting from their own activities as well as from the operations of companies under their control, subcontractors and suppliers with whom they have an established business relationship.<sup>347</sup> The law requires the parent company to publish and implement a detailed due diligence plan or account for the failure to do so. The plan must include a mapping that identifies, analyzes and ranks risks; procedures to regularly assess, in accordance with the risk mapping, the situation of subsidiaries, subcontractors or suppliers with whom the company maintains an established commercial relationship; appropriate actions to mitigate risks or prevent serious violations; an alert mechanism that collects potential or actual risks; and a

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<sup>345</sup> Act on Corporate Due Diligence Obligations in Supply Chains” (Official Translation), *Federal Ministry of Labour and Social Affairs*, 2021. [https://www.bmas.de/SharedDocs/Downloads/DE/Internationales/act-corporate-due-diligence-obligations-supply-chains.pdf?\\_\\_blob=publicationFile&v=3](https://www.bmas.de/SharedDocs/Downloads/DE/Internationales/act-corporate-due-diligence-obligations-supply-chains.pdf?__blob=publicationFile&v=3).

<sup>346</sup> European Center for Constitutional and Human Rights (ECCHR), “People, Planet, Profits: Making the UN Treaty on Business & Human Rights Effective in the Era of Supply Chains.” *ECCHR*, 2023. [https://www.ecchr.eu/fileadmin/user\\_upload/ECCHR\\_PP\\_SUPPLY\\_CHAIN\\_EN\\_PF.pdf](https://www.ecchr.eu/fileadmin/user_upload/ECCHR_PP_SUPPLY_CHAIN_EN_PF.pdf).

<sup>347</sup> European Coalition of Corporate Justice, “French Corporate Duty of Vigilance Law (English Translation).” *European Coalition of Corporate Justice*, 2016. <https://respect.international/french-corporate-duty-of-vigilance-law-english-translation/>.

monitoring scheme to follow up on the measures implemented and assess their efficiency.

The French law applies to companies whose head office is in France and employs at least 5,000 employees, and companies headquartered in France or abroad with at least 10,000 employees within the company and its direct and indirect subsidiaries.

## IX. Recommendations

### *Recommendation to Brazil's Federal Government*

#### National Traceability and Compliance Monitoring Tools for Cattle Sector

- Transform the AB+S platform into a **national compliance monitoring platform**.
  - Provide public access to compliance information on properties, owners, and operators—searchable by name and location—while safeguarding legally-protected personal data.
  - Incorporate additional official datasets needed to identify non-compliant producers, such as labor inspection reports and geographic data on Indigenous lands pending official designation.
  - Maintain and expand features that help producers demonstrate compliance, correct registry errors, and access guidance on meeting socio-environmental standards.
- Develop **national traceability systems** for cattle supply chains to allow mapping of indirect suppliers.
  - Launch in the short term a national **batch traceability system** using GTA records, harmonized across all states, to map cattle movements between properties and identify indirect suppliers.
  - Accelerate the implementation of the PNIB **individual traceability system** to achieve full animal traceability well before the announced target 2032.
  - Provide financial and technical support for small producers—including subsidies for tags, training, and digital connectivity—to ensure their full participation in both batch and individual systems.
- Establish a **national traceability systems and monitoring mechanism** by integrating the traceability systems with the compliance monitoring platform.
  - Designate an independent entity with full access to traceability and compliance data to assess whether, and to what extent, specific farms, slaughterhouses, and tanneries are linked to suppliers implicated in environmental or human-rights harms.
  - Establish an oversight committee—composed of industry, civil society, and academic representatives—to define assessment criteria, audit performance, and oversee results of the mechanism, in coordination with the Federal Prosecutor's Office and the federal ministries of agriculture and environment.

- Create an online platform for public consultations that makes compliance and supply chain risk assessments accessible, while protecting producers' personal data.
- Strengthen core official data tools used for traceability and compliance monitoring.
  - Validate CAR records to resolve overlapping and fraudulent claims, particularly in public lands and Indigenous territories.
  - Strengthen GTA reporting by addressing fraudulent and missing entries—such as falsified GTAs used for cattle laundering—and by standardizing data nationwide so each movement can be reliably linked to property and ownership information in CAR records.
  - Ensure timely and comprehensive publication of IBAMA embargo registries, the “Dirty List” of slave labor, and maps of Indigenous territories, including those pending recognition.
  - Expand the range of official datasets publicly available for compliance monitoring—such as labor inspection reports and geographic data on Indigenous lands pending designation.

## Mandatory Human Rights Due Diligence

- Support the passage and effective implementation of the proposed National Framework on Human Rights and Business (PL 572/2022).
  - Endorse the adoption of this legislation establishing mandatory human rights due diligence across all sectors, including agriculture and livestock.
  - Ensure that implementing regulations provide clear guidance for companies, robust state oversight, and meaningful remedies for affected groups.

## *Recommendation to Brazil's National Congress*

### Mandatory Human Rights Due Diligence

- Pass Legislative Proposal (PL 572/2022) to establish a National Framework on Human Rights and Business making human rights due diligence mandatory across all sectors, including agriculture and livestock, requiring companies to identify, prevent, monitor, and remedy abuses throughout their value chains.

## *Recommendations to Slaughterhouses in Brazil*

### Public Commitments

- Commit publicly to ensure cattle supply chains are free of direct and indirect suppliers implicated in illegal deforestation, forced labor, Indigenous land invasions, and other serious environmental and human rights harms.
- Publish detailed descriptions of policies implemented to ensure that suppliers are complying with sourcing requirements related to forest conservation and human rights.

### Public Advocacy

- Advocate for and support the implementation of a national integrated traceability and compliance monitoring mechanism for cattle supply chains.
- Advocate for making the AB+S platform available for public consultation to facilitate compliance monitoring.
- Advocate for public access to official information beyond existing monitoring tools—and its inclusion in the AB+S platform—that can be used to identify non-compliant producers (such as labor inspection reports and geographic data on Indigenous lands that are pending official designation as territories).

### Due diligence

- Take steps to strengthen monitoring of suppliers' compliance with sourcing requirements related to forest conservation and human rights.
  - Use all available official monitoring tools—including CAR records, the IBAMA embargo registry, the “slave labor” Dirty List, and digitalized maps of Indigenous territories—while recognizing that these tools alone may be insufficient to detect non-compliance among suppliers.
  - Use public traceability and compliance monitoring platforms established by state governments, as well as reputable third-party systems, to detect non-compliance by indirect suppliers.
  - Strengthen private company monitoring systems by offering economic incentives to cattle producers to provide GTAs, and by requiring this information be furnished for all transactions involving direct or indirect suppliers in high-risk locations or circumstances.
- Conduct rigorous risk assessment to identify factors that warrant heightened tracing and compliance scrutiny and stricter sourcing requirements.



- Risk factors should include, among others:
  - Location of property within a municipality with high incidences of illegal deforestation, workers subject to conditions analogous to slavery, and/or invasions of Indigenous lands.
  - Location of property in close proximity to an Indigenous territory.
  - Property or owner that has received orders to remove cattle from Indigenous or other protected lands.
  - Property or employer with workers subject to conditions analogous to slavery according to federal labor inspectors—even if the employer has not been placed on the Dirty List.
  - Property owner with other properties under embargo for illegal deforestation.
- Heightened scrutiny should include, among other things, the following:
  - Requiring direct suppliers to provide GTAs for all transactions with indirect suppliers, as well as property names and precise geographic coordinates, and taxpayer identification numbers (CPF or CNPJ) of property owners and employers.
  - Requiring direct suppliers to provide official documentation proving that all its employees—and all employees of indirect suppliers—have been properly registered, paid, and provided benefits in accordance with Brazilian law.
- Where such heightened scrutiny is not possible in the case of a high-risk supplier—whether due to limited company capacity, failure of the supplier to provide requisite information, or any other reason—that supplier should be blocked from the company’s supply chain.
- Take steps to strengthen stakeholder engagement in areas from which cattle are sourced.
  - Conduct consultations and maintain regular communication with key government, civil society actors, cattle producer associations, and any other actors that can help identify high-risk circumstances and specific instances of potential non-compliance.
  - Establish effective, accessible, and anonymous mechanisms that allow reporting of risk factors and instances of non-compliance.
  - Establish community offices or deploy staff on regular basis to high-risk municipalities to conduct outreach with local stakeholders—including cattle ranchers, community leaders and associations, rural workers unions,

- civil society organizations, and the general population—aimed at raising awareness about relevant environmental and human rights norms and protections, company sourcing policies, and risk reporting mechanisms.
- Seek rigorous auditing by reputable, third-party auditors, that examine effectiveness or tracing and compliance monitoring policies against commitments and legal obligations.

## Disclosure

- Publicly report on progress in fulfilling sustainability commitments, including providing:
  - Detailed descriptions of the environmental and human rights risks in regions where suppliers are located.
  - Detailed assessments of effectiveness of due diligence and sourcing policies, with a full description of obstacles to more effective tracing and compliance monitoring, and steps the company is taking to overcome these.

## *Recommendations to Tanneries in Brazil*

### Public Commitments

- Commit publicly to sourcing only from slaughterhouses whose supply chains are free of direct and indirect suppliers implicated in illegal deforestation, forced labor, Indigenous land invasions, and other serious human rights and environmental harms.
- Publish detailed descriptions of policies implemented to ensure that suppliers are complying with sourcing requirements related to forest conservation and human rights.

### Public Advocacy

- Advocate for and support the implementation of a national integrated traceability and compliance monitoring mechanism for cattle supply chains.
- Advocate for making the AB+S platform available for public consultation to facilitate compliance monitoring.
- Advocate for public access to official information beyond existing monitoring tools—and its inclusion in the AB+S platform—that can be used to identify non-

compliant producers (such as labor inspection reports and geographic data on Indigenous lands that are pending official designation as territories).

## Due diligence

- Take steps to strengthen monitoring of slaughterhouses' compliance with sourcing requirements related to forest conservation and human rights.
  - Use all available official monitoring tools—including CAR records, the IBAMA embargo registry, the “slave labor” Dirty List, and digitalized maps of Indigenous territories—to check compliance of slaughterhouses' direct and indirect suppliers in high-risk areas, while recognizing that these tools alone may be insufficient to detect non-compliance.
  - Use public traceability and compliance monitoring platforms established by state governments, as well as reputable third-party systems, to detect non-compliance by indirect suppliers within slaughterhouses' supply chains.
  - Help strengthen private company monitoring systems by contributing to economic incentives to cattle producers to provide GTA records of transactions with indirect suppliers.
- Conduct rigorous review of slaughterhouses' risk assessments to verify that they are identifying high-risk suppliers accurately and applying heightened scrutiny and stricter sourcing requirements where appropriate.
  - Slaughterhouses that fail to demonstrate adequate vetting of high-risk suppliers within their cattle supply chains should be pressed to do better, and—if they do not take credible steps to do so—should be removed from the tannery's supplier list.
- Undertake stakeholder engagement in sourcing regions connected to the slaughterhouses that supply their hides.
  - Conduct consultations with key government bodies, civil society groups, cattle producer associations, and other actors to identify risk factors that warrant heightened scrutiny and ensure that slaughterhouses are addressing them appropriately.
- Review auditing reports commissioned by slaughterhouses to evaluate the effectiveness of tracing and compliance monitoring policies.

## Disclosure

- Publicly report on progress in fulfilling sustainability commitments, including providing:
  - Detailed descriptions of the environmental and human rights risks in regions where suppliers are located.
  - Detailed assessments of effectiveness of slaughterhouses' due diligence and sourcing policies, with a full description of obstacles to more effective tracing and compliance monitoring, and the steps being taken to overcome these.

## *Recommendations to Global Fashion and Footwear Companies*

### Public Commitments

- Commit publicly to ensuring that leather supply chains are free of suppliers implicated in illegal deforestation, forced labor, Indigenous land invasions, and other severe human rights and environmental harms in Brazil and elsewhere.
- Publish detailed descriptions of policies implemented to ensure that suppliers are complying with sourcing requirements related to forest conservation and human rights.

### Collective Action

- Work in coalition with other companies and industry groups to pool resources, knowledge, and capacity to monitor leather supply chains—from product manufacturers through Brazilian tanneries and slaughterhouses to cattle ranches—and use collective influence to advocate for stronger traceability and sustainability in Brazil's cattle sector.

### Public Advocacy

- Advocate for and support the implementation of a national integrated traceability and compliance monitoring mechanism for cattle supply chains.
- Advocate for making the AB+S platform available for public consultation to facilitate compliance monitoring.
- Advocate for public access to official information beyond existing monitoring tools—and its inclusion in the AB+S platform—that can be used to identify non-

compliant producers (such as labor inspection reports and geographic data on Indigenous lands that are pending official designation as territories).

## Due Diligence

- Conduct a thorough mapping of supply chains to identify possible links to Brazilian tanneries—and, if such links exist, trace supply chains back to slaughterhouses and, to the maximum extent possible, cattle producers.
- Take steps to strengthen monitoring of tanneries' and slaughterhouses' compliance with sourcing requirements related to forest conservation and human rights.
  - Use available official monitoring tools—including CAR records, the IBAMA embargo registry, the “slave labor” Dirty List, and digitalized maps of Indigenous territories—to check compliance of slaughterhouses that supply hides to tanneries linked to brands' supply chains, while recognizing that these tools alone may be insufficient to detect non-compliance.
  - Use public traceability and compliance monitoring platforms established by state governments, as well as reputable third-party systems, to detect non-compliance by indirect suppliers within tanneries' supply chains.
  - Support company monitoring systems by contributing to economic incentives for cattle producers to provide all GTAs records of transactions with indirect suppliers.
- Conduct review of risk assessments by slaughterhouses that supply hides to tanneries linked to brands' supply chains to verify that they are identifying high-risk suppliers accurately and applying heightened scrutiny and stricter sourcing requirements where appropriate.
  - Tanneries sourcing from slaughterhouses that are not adequately vetting high-risk cattle producers within their cattle supply chains should be pressed to do better, and—if they fail to take credible steps to do so—should be excluded from their leather supply chains.
- Undertake stakeholder engagement in areas from which cattle are sourced by the slaughterhouses that supply hides to tanneries linked to brands' supply chains.
  - Conduct consultations with key government, civil society actors, and cattle producer associations that can help identify and understand risk factors that warranted heightened scrutiny by slaughterhouses.

- Review auditing reports commissioned by slaughterhouses that supply tanneries linked to brands' supply chains to evaluate the effectiveness of tracing and compliance monitoring policies.

## Disclosure

- Publicly report on progress in fulfilling sustainability commitments related to leather supply chains linked to Brazil, including:
  - Clear descriptions of environmental and human-rights risks in the regions where cattle are sourced by slaughterhouses that supply tanneries linked to the brand's supply chain.
  - Detailed assessments of the effectiveness of due-diligence and sourcing policies of Brazilian slaughterhouses and tanneries linked to the brand's supply chain, including obstacles to more effective tracing and compliance monitoring and the steps being taken to overcome them.



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## APPENDIX A: Reports on Brazilian Cattle Supply Chains

AidEnvironment, [\*Deforestation on Your Plate\*](#), 2024. (Deforestation, Indigenous Land Invasions).

AidEnvironment, [\*Soy and cattle supply chains Amazon & Cerrado biomes – Brazil Reports 2-6\*](#), 2022. (Deforestation, Indigenous Land Invasions).

AidEnvironment, [\*Compliance Checker\*](#), 2025. (Deforestation, Labor Violations)

Amnesty International, [\*Brazil: Cattle illegally grazed in the Amazon found in supply chain of leading meat-packer JBS\*](#), 2020. (Indigenous Land Invasions)

Amnesty International, [\*From forest to farmland\*](#), 2020. (Deforestation, Indigenous Land Invasions)

Bloomberg, [\*How Big Beef is Fueling the Amazon's Deforestation\*](#), 2022. (Deforestation)

The Bureau of Investigative Journalism, [\*Reign of fire: blazes surge on 'protected' Amazon land under Bolsonaro\*](#), 2021. (Deforestation).

Corporate Accountability Lab, [\*Bullsh\\*t Forced Labor In Brazil's Beef And Tallow Supply Chains\*](#), 2025. (Labor Violations)

Center for Climate Crime Analysis, [\*Casino Case\*](#), 2022. (Deforestation, Indigenous Land Invasions)

Center for Climate Crime Analysis, [\*Deforestation in Brazil\*](#), 2022. (Deforestation, Labor Violation, Indigenous Land Invasions)

EarthSight, [\*Grand Theft Chaco\*](#), 2020. (Deforestation, Indigenous Land Invasions)

EarthSight, [\*The Hidden Price of Luxury\*](#), 2025. (Deforestation, Indigenous Land Invasions)

Environmental Investigation Agency, [\*Deforestation in the Driver's Seat\*](#), 2022. (Deforestation)

Environmental Investigation Agency, [\*Who Bought Apyterewa's Illegal Cattle?\*](#), 2024. (Deforestation, Indigenous Land Invasions)

Environmental Justice Foundation, [\*Impact Of EU Supply Chains On Deforestation And Biodiversity In Brazil's Pantanal: A Global Wetland Under Threat\*](#), 2023. (Deforestation)

Environmental Justice Foundation, [\*Slave labour in the Brazilian cattle ranching industry\*](#), 2023. (Deforestation, Labor Violations)

Global Canopy, [\*Floresta 250 – Cattle baseline 2024\*](#), 2024. (Deforestation)

Global Witness, [\*Beef, Banks And The Brazilian Amazon\*](#), 2020. (Deforestation, Indigenous Land Invasions)

Global Witness, [\*Cash Cow\*](#), 2022. (Deforestation, Labor Violations)

Global Witness, [\*One football field of tropical forest a day destroyed by farms supplying JBS\*](#), 2024. (Deforestation)

Global Witness, [\*The Cerrado crisis: Brazil's deforestation frontline\*](#), 2024. (Deforestation, Indigenous Land Invasions)

Greenpeace, [\*Case Study - Ricardo Franco State Park\*](#), 2020. (Deforestation)

Greenpeace, [\*An old acquaintance of illegal deforestation returns to the scene in the Amazon\*](#), n.d. (Deforestation)

Greenpeace, [\*Making Mincemeat of the Pantanal\*](#), 2021. (Deforestation)

Mighty Earth, [\*Soy and Cattle Reports\*](#), 2019-2021. (Deforestation, Indigenous Land Invasions)

New York Times, [\*How Americans' Appetite for Leather in Luxury SUVs Worsens Amazon Deforestation\*](#), 2021. (Deforestation, Indigenous Land Invasions)

Joio e O Trigo, [\*Nestlé buys collagen from cattle raised in deforested areas in Brazil\*](#), 2023. (Deforestation, Indigenous Land Invasions)

Rainforest Foundation Norway, [\*Driving Deforestation\*](#), 2021. (Deforestation, Indigenous Land Invasions)

Rainforest Foundation Norway, [Hide on the Highway](#), 2024. (Deforestation, Labor Violations, Indigenous Land Invasions)

Rainforest Foundation Norway, [The impact of a shift in global demand for leather on Brazilian slaughterhouses](#), 2024. (Deforestation)

Repórter Brasil, [Cattle raised illegally on indigenous land in Pará supplies JBS and Frigol](#), 2022. (Deforestation, Indigenous Land Invasions)

Repórter Brasil, [Indigenous people reoccupy farms where illegal cattle were raised using slave labor in Pará](#), 2025. (Deforestation, Labor Violations, Indigenous Land Invasions)

Repórter Brasil, [JBS admits to buying nearly 9,000 illegal cattle from the country's biggest deforester](#), 2022. (Deforestation, Labor Violations)

Repórter Brasil, [JBS buys cattle from a farm with deforestation that was later targeted by fire](#), 2022. (Deforestation)

Repórter Brasil, [JBS continues to purchase cattle from Amazon deforesters despite being fined R\\$25 million](#), 2019. (Deforestation, Labor Violations, Indigenous Land Invasions)

Repórter Brasil, [JBS transports cattle from deforesters and goes against its policy of only having suppliers that preserve the Amazon](#), 2020. (Deforestation)

Repórter Brasil, [Pão de Açúcar suspends meat purchases from suppliers fined for slave labor](#), 2019. (Labor Violations)

Repórter Brasil, [Slave Labor in the Meat Industry](#), 2021. (Deforestation, Labor Violations)

Repórter Brasil, [The 'pirate ox' raised on indigenous land and the connection with the meatpacking companies Marfrig, Frigol and Mercúrio](#), 2020. (Deforestation, Indigenous Land Invasions)

Reuters, [Slaves to deforestation: Labor abuses fuel Brazil's Amazon destruction](#), 2021. (Labor Violations)

## APPENDIX B: Communications with Companies

### Letter sent by Climate Rights International to fashion and footwear brands.

Recipients included Adidas, Asics Corporation, Calvin Klein, Clarks, Coach, Converse, ECCO, H&M, Hugo Boss, Kate Spade, Kompanero, Lacoste, Marks and Spencer, Michael Kors, New Balance, Nike, Puma, Reebok, Rockport, The North Face, Ted Baker, Timberland, Tommy Hilfiger, and Vans

### Letter sent by Climate Rights International to companies operating tanneries in Brazil.

Recipients included Durlicouros, Mastrotto, and Viposa.

### Letter sent by Climate Rights International to companies operating slaughterhouses in Brazil.

Recipients included Frigol, JBS, Masterboi, Marfrig Global Foods, Minerva Foods, Pantanal, and Rio Maria.

### **Responses by companies:**

- Adidas
- Durlicouros
- Frigol
- Hugo Boss
- Minerva Foods
- Pantanal
- Puma
- Tapestry (parent company of Coach and Kate Spade)
- VF Corporation (parent company of The North Face, Timberlands, and Vans)

Cover photo: Weliton Pires, courtesy of Centro de Defesa da Vida e dos Direitos Humanos  
Carmen Bascarán