



Complicity in Destruction II:

HOW NORTHERN CONSUMERS AND FINANCIERS ENABLE BOLSONARO'S ASSAULT ON THE BRAZILIAN AMAZON



AMAZON WATCH



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Photo: Mídia Ninja/Mobilização Nacional Indígena

EXECUTIVE SUMMARY

As the world's largest rainforest, the Amazon provides 20% of our oxygen, houses 10% of the planet's biodiversity, and helps stabilize the global climate. The world needs it to survive. None understand this better than the indigenous peoples and traditional communities who call it home, and are proven to be its best stewards.

Despite their importance, the Brazilian Amazon and its peoples are suffering the worst assault in a generation. Deforestation is mounting dramatically while hard-fought environmental and human rights protections, critical to the future of the rainforest, are under serious attack. Indigenous peoples and traditional communities themselves suffer disproportionate violence and repression for defending their rights and forests.

The ascension of the extreme right-wing politician Jair Bolsonaro to Brazil's presidency profoundly exacerbates the country's environmental and human rights crisis. Since taking power, his government has slashed socio-environmental standards that are fundamental to preserving the Amazon's ecological integrity and the well-being of forest peoples. Bolsonaro's severe policy rollbacks are occurring in the context of a generalized attack on the country's democratic principles and institutions.

A dominant, conservative faction of the country's powerful agroindustrial sector known as the "ruralistas" is helping drive Bolsonaro's Amazon agenda. Working from within Bolsonaro's government, industry representatives are stripping protections for forests and land rights in order to gain unfettered access to areas currently safeguarded from industrial activity. Their success would spell disaster for Brazil's Amazonian forests and the indigenous and traditional peoples who call them home, while jeopardizing the global climate.

The political and economic power that sustains these retrograde actors is provided in large part by global market actors: commodity traders, financiers and consumers. European and North American businesses that finance and source from Brazilian businesses connected with today's rollbacks therefore enable Brazil's socio-environmental landscape to be reshaped to our collective detriment.

The crises facing the Amazon require innovative solutions that address the root of the problem. By identifying the worst actors operating in the Brazilian Amazon and the global companies and financial institutions that enable them, we can build new forms of leverage over these actors and press for reform and accountability on the part of the Bolsonaro regime.

To challenge adversaries in the federal government and private sector, Brazil's National Indigenous Mobilization (MNI) has called for a global boycott of Brazilian commodities associated with human rights abuses and environmental destruction. The MNI requests solidarity from international community to support these efforts, which aim to leverage global markets in order to moderate the behavior of the agroindustrial sector, as a means to halt Bolsonaro's assault, ultimately protecting and restoring environmental safeguards and human rights.

Global solidarity with Brazil's movement for social and environmental justice is more critical now than ever. While we acknowledge the North's oversized role in environmental mismanagement, human rights abuses, and climate change, we believe that through informed choices, the European and North American private sector and engaged citizens in the region can considerably influence the destructive agenda of the Bolsonaro government.



Photo: Marizilda Cruppe / Greenpeace

INTRODUCTION

THE AMAZON RAINFOREST SUSTAINS LIFE ON EARTH. Hosting 20% of its flowing freshwater,¹ the planet's largest rainforest drives weather patterns and stabilizes the global climate.² The wellbeing of this forest, and that of its guardians from indigenous and traditional communities, is therefore indispensable to our collective future.

What happens to this global treasure is up to all of us. While the Amazon's health depends upon the stewardship of the nine countries that share this 5.5 million km² biome, the role of global markets - from commodity traders to financiers to consumers - directly implicate us in its fate.

Today, the Amazon's irreplaceable ecosystems are under immense threat, driven primarily by a handful of industrial interests, industry-beholden governments,³ and organized crime.⁴ Jair Bolsonaro's Brazil provides a grim case study in this reality.

Deforestation in the Brazilian Amazon has steadily risen since 2012,⁵ while the country's socio-environmental safeguards grew increasingly precarious, particularly under the government of Michel Temer from 2016 through 2018.⁶ Under Bolsonaro's watch, deforestation has already spiked 54%.⁷ Throughout this period, conservative actors within Brazil's powerful agribusiness sector have played a central role in shifting policies to facilitate the expansion of industry into protected areas.

The Bolsonaro regime now threatens to cement a significant rollback on human rights and ecological protections led by cabinet members serving as political operatives for the country's agribusiness and mining sectors.⁸ Their conduct endangers the Amazon and is predicated on the belief that international consumers and financial institutions will continue to do business with these industrial actors - including those criminally destroying the rainforest - regardless of their behavior.

As is true with other autocratic governments, one cannot look to the Bolsonaro regime itself for remedy. The ability to forge change comes instead from leveraging the global markets that sustain the Brazilian economy, particularly its strategic agroindustrial sector, given its reliance on lucrative export commodities and foreign investment.

This report examines how some of the worst actors operating in the Brazilian Amazon - which have documented links to illegal deforestation, corruption, slave labor, and other crimes - openly trade with and receive financing from a range of companies in Europe and North America. By analyzing 56 Brazilian companies that were fined for environmental crimes in the Amazon since 2017, and identifying a range of northern commercial interests that do business with them, this report demonstrates the complicity of global actors with this kind of egregious behavior, increasingly becoming the norm under the Bolsonaro regime.

The private sector offers one of the few checks available on those intent on devastating the Brazilian Amazon for short-term economic and political gain. If we do not exercise our influence over these actors we will collectively pay the price.



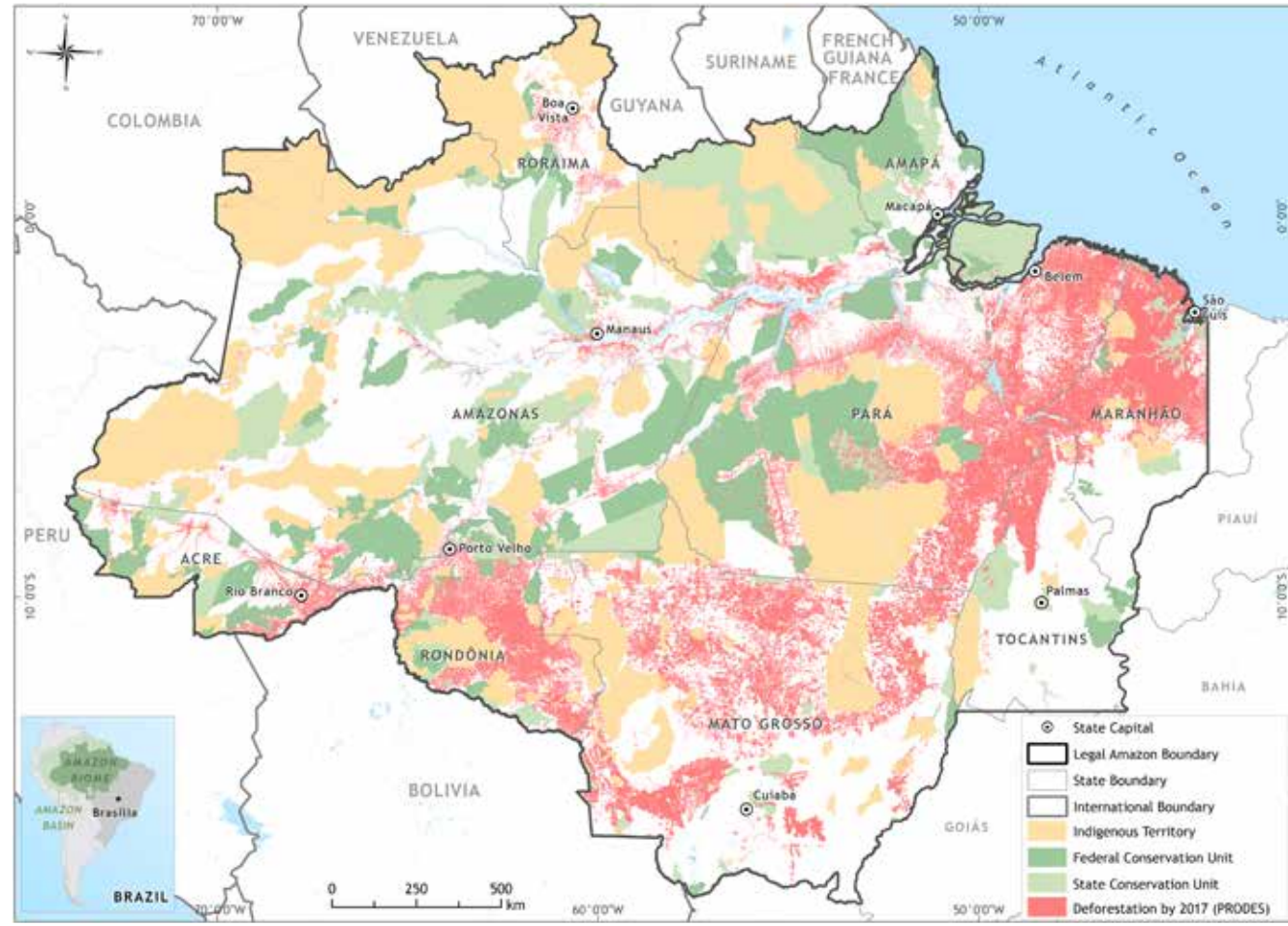
Photo: Jeanny Tsai



Photo: Mídia Ninja/Mobilização Nacional Indígena

THE AMAZON IN FLAMES

With two-thirds of Amazon within its borders, Brazil plays a critical role in the future of our planet's climate. The country therefore has immense potential, and a responsibility, to offer environmental leadership by rigorously protecting its irreplaceable rainforests and their inhabitants.



The titled territories of Brazil's 305 distinct indigenous ethnicities comprise 23% of the Brazilian Amazon and are among the best-conserved forests in a mosaic of protected areas spanning the Amazon region.⁹

Indigenous land rights are therefore intrinsically linked to the preservation of the biome. Conversely, the absence of these rights, coupled with the undermining of robust environmental safeguards on other protected areas, jeopardizes the future of the rainforest.

Map: IMAZON, "O Estado das Áreas Protegidas: desmatamento." 19 June, 2018 / <https://amazon.org.br/publicacoes/o-estado-das-areas-protegidas-desmatamento/>

Contrary to this urgent need for environmental and rights protection, the rainforest is imperiled. Less than four months into Bolsonaro's presidency, a human rights and environmental catastrophe is unfolding in Brazil.¹⁰ These impacts are being felt first and foremost by forest communities.¹¹ If they are permitted to advance, their enduring, disastrous legacy will impact us all.

With Amazon deforestation at a 10-year high and mounting,¹² the Bolsonaro administration is laying the groundwork for far more explosive forest destruction in the months to come.¹³ The congressional *ruralista* caucus, representing a conservative faction of Brazil's powerful agroindustrial sector and in coordination with the mining sector, are the principal actors driving this regressive agenda.¹⁴

The Bolsonaro government's willingness to unilaterally override environmental conservation and human rights standards to please a narrow set of private interests undermines the integrity of Brazil's network of protected areas, particularly indigenous territories, which have become a primary target.¹⁵ It also sets a dangerous precedent among criminal actors operating in the Amazon, who apparently see Bolsonaro's policies and toxic rhetoric as a signal that their actions will go unpunished.¹⁶



Photo: Daniel Beltrá / Greenpeace



Photo: Mídia Ninja/Mobilização Nacional Indígena



Photo: Mídia Ninja/Mobilização Nacional Indígena

Brazilian Human Rights and Environmental Protections Under Assault

Brazil is experiencing its most severe assault on social and environmental protections in 30 years. Below is a summary of some of the most pressing threats to the Brazilian Amazon and its peoples.

Institutional Attacks on Indigenous Land Rights

Upon taking power, Bolsonaro stripped the indigenous agency FUNAI of its mandate to identify and grant title to indigenous territories, transferring this authority to the Agriculture Ministry, which is led by anti-indigenous hardliners.¹⁷ The move definitively paralyzes land demarcations of more than 232 indigenous territories and incites new conflicts on indigenous lands.¹⁸ His government also attacked the legality of recent titling processes, announcing it would scrutinize indigenous demarcations from the past ten years, prompting fears of their annulment.¹⁹

Meanwhile, the government shifted FUNAI's oversight from the Ministry of Justice to the newly-formed Ministry of Women, Family, and Human Rights,²⁰ headed by an evangelical zealot who has been denounced by indigenous peoples for misrepresentation and proselytising in native communities.²¹ With its mandate split, FUNAI has been starved of funds and is currently operating on 10% of its allotted budget, forcing it to abandon key service and monitoring outposts in rural communities.²²

Invasions of Indigenous Territories

As of March 2019, at least fourteen cases of illegal invasions were documented across Brazil, mainly in the Amazon, a rise of 150% since Bolsonaro took power.²³ Mr. Bolsonaro's brazen conflict of interest with the agribusiness sector sends dangerous signals to criminal factions such as land grabbers, illegal loggers, and wildcat miners, driving a wave of land invasions.²⁴ Recent attacks can be linked to the virulently anti-indigenous rhetoric emanating from Brasília, signaling a much more serious and widespread assault on natives lands and lives in times to come. The impunity it implies is driving an explosion of invasions of indigenous lands.

Dismantling of Environmental Institutions

Under Bolsonaro, Brazil's Environmental Ministry (MMA) suffered devastating cuts, restructuring, and loss of autonomy.²⁵ The ministry no longer has the jurisdiction to combat deforestation, which was among the principal roles of the country's environmental policy since 1980.²⁶ Management of Brazil's forestry service was handed to the Agriculture Ministry, deeply undermining its mission to protect native forests. Meanwhile, the Environment Minister moved to inhibit the enforcement agency IBAMA from cracking down on environmental crime, suggesting that fines for past crimes could be expunged.²⁷ The MMA's mission has clearly become subordinate to the interests of agribusiness and other anti-environmental actors.

Agribusiness and mining on indigenous territories

Ruralista lawmakers and their allies in the mining lobby are aggressively pushing to open indigenous territories to industrial agriculture and mining.²⁸ The heads of the Ministry of Agriculture and Ministry of Mines and Energy both announced their plans to alter Brazilian legislation to permit industrial activities in indigenous territories.²⁹ Such a move could have profound implications for the well being of indigenous communities and the lands upon which they depend.

Dispensing with Environmental Licensing

Brazil's Environmental Minister and his allies in the ruralista caucus are aggressively advancing legislation that slashes environmental licensing norms.³⁰ The proposed law would provide automatic approval for agribusiness projects and fast-track approval for major infrastructure development, while dispensing with the obligation to consult communities threatened by projects that primarily serve industrial activities in the Amazon.³¹ Subservient to the interests of the agribusiness and mining sectors, Bolsonaro's government appears determined to facilitate rollbacks that would essentially discard Brazil's much-needed vetting process for projects that pose significant socio-environmental risks.³² The deadly mining waste disaster in Brumadinho underscores the need for improved, not reduced, environmental oversight.³³

Rewarding environmental crime and human rights abuses?

As in other parts of the world, Bolsonaro's regressive policies have emboldened corrupt, racist, and reactionary forces to undo decades of hard-fought socio-environmental safeguards. As territorial rights are undermined, industrial lobbies aggressively work to gain access to protected forests, pushing to allow agribusiness, mining, and infrastructure development on indigenous lands.³⁴ Efforts to undermine FUNAI's credibility, mandate, and budget to advocate on behalf of native communities are part of this aggressive campaign.³⁵

The attacks on Brazil's indigenous peoples, and traditional communities such as *quilombos*,³⁶ are both political and physical. Brazil is the world's deadliest country to be an environmental and human rights defender, with indigenous peoples paying a particularly severe toll.³⁷ The government's apparent indifference to the plight of forest peoples sends a chilling sign that violence and murder will go unpunished, encouraging further cycles of brutality.

Blood on Bolsonaro's Hands: Rising Rural Violence

Brazil is the world's deadliest country for those defending human rights and the environment, with agribusiness driving killings more than any other industry.³⁸ Bolsonaro's violent rhetoric has already been accompanied by a spike in rural violence, particularly against indigenous people and landless activists, emboldening militias controlled by powerful landowners to carry out attacks.³⁹ His decree to loosen gun ownership in Brazil will almost assuredly aggravate violence,⁴⁰ particularly in rural areas.⁴¹ By endorsing violence from major landowners, Bolsonaro fuels the intimidation of community leaders on the front lines of increasingly brutal land conflicts, including prominent indigenous leaders who now fear for their lives.⁴²



Photo: Mídia Ninja/Mobilização Nacional Indígena



Photo: Marizilda Cruppe / Greenpeace
Illustration: Eduardo Baptista

MODERATING THE BOLSONARO GOVERNMENT: THE ROLE OF GLOBAL MARKETS

While links between Brazilian agribusiness and the country's worsening environmental and humanitarian crisis are easily drawn, links to global commercial entities helping to enable this crisis are not as immediately apparent.

Having emerged recently from a crippling three year economic recession, Brazil's economy is increasingly dependent on foreign markets via investment or purchase of export commodities.⁴³ This dependence makes the Bolsonaro regime's brutal Amazon agenda responsive to market and policy shifts from international companies and financiers attuned to the human rights and climate risks of operating in the Brazilian Amazon in this context.

Bolsonaro ran as a far-right populist while appealing to big business with his appointment of University of Chicago-educated investment banker Paulo Guedes as his Finance Minister and his promotion of neoliberal reforms in the wake of the 2014-2017 economic recession.⁴⁴ The Brazilian stock market reached a record high after his election,⁴⁵ signalling business enthusiasm for the change in regime.

As the Brazilian economy becomes more open, it will also become more intertwined with the global economy. This in turn will give international actors more sway over the actions of the Brazilian government. This market pressure could cut two ways: it could enable the continued destruction of the Amazon rainforest and the displacement of its indigenous inhabitants, or it could serve as a moderating force that mitigates the plunder by Bolsonaro's regime.

Agribusiness for export: trade relationships and levers of influence

As the world's 22nd largest exporter, many of Brazil's main exports are forest-risk commodities, such as soybeans, animal products including poultry and beef, raw sugar, and paper goods.⁴⁶ The broader importance of agribusiness to the Brazilian economy as a whole also cannot be overstated: according to Brazil's National Agriculture and Ranching Confederation, in 2017, agriculture and agribusiness accounted for 44% of exports⁴⁷ and 23% of the country's GDP, a 13-year high.⁴⁸

Industry spokespeople routinely credit Brazilian agribusiness with steering the country out of its worst recession on record.⁴⁹ Meanwhile, the U.S. government's threats of trade war with China has boosted the value of Brazilian soy, tripling premiums on Brazil's largest agricultural export commodity.⁵⁰

Brazil's three largest trade partners are China, the European Union, and the United States. China purchases 22% of Brazilian exports while the the European Union and United States account for 18.3 and 11%, respectively.⁵¹ In the cases of the EU and China, the majority of these imports are agricultural commodities, giving these actors significant influence over agribusiness: losing even a small portion of the global market would represent a significant blow to Brazilian agribusiness.

The European Union: a key Brazilian trade partner considering groundbreaking policy shifts

The EU is Brazil's second largest trade partner, after China, accounting for 18.3% of its trade.⁵⁴ Most of the EU's imports are primary products; Brazil exports more agricultural commodities to the EU than any other supplier.⁵⁵ For example, 41% of the EU's beef imports came from Brazil in 2018.⁵⁶

EU member states and companies also provide significant foreign direct investment to Brazil: nearly half the EU's Latin American investments went to the country in 2015.⁵⁷ These investments, to the tune of \$422 billion, have a major impact on the Brazilian economy.

As the EU negotiates with the Mercosur trade bloc countries, including Brazil, to remove barriers to trade through a free trade agreement,⁵⁸ large Brazilian agribusiness companies exporting to the EU could benefit from new business opportunities. The EU therefore has a key role in ensuring that its trade policies safeguard the Amazon and the rights of its inhabitants. EU leadership has underscored the importance of these issues,⁵⁹ and Brazil's socio-environmental crisis mandates that European negotiators emphasize these matters under a new agreement.⁶⁰

China in Brazil

China is a key economic partner for countries across Latin America, in terms of both trade and foreign direct investment. These ties extend to Brazil, where where China is the country's most important trade partner. Brazil exported \$48 billion of goods to China while importing \$27 billion of goods from the country.⁵² China is the largest importer of agricultural products from Brazil, meaning its government and consumers play a key role in the future of Amazon. For example, as China's demand for Brazilian soy surges due to a trade war between the United States and China, it could drive further ecological catastrophe: 13 million hectares (50,000 square miles) in the Amazon and Cerrado could ultimately be cleared to meet this additional demand.⁵³

While this report focuses on the role of United States and European institutions in Amazon destruction, the importance of Chinese purchasing and investment practices should not be understated. Additional research is required to better understand the commercial and political links between China and Brazil, coupled with advocacy efforts led by Chinese civil society, to ensure that the country takes socio-ecological protections into account within its purchasing and financing policies.

BOLSONARO'S ACCOMPLICES, ENACTING THE REGIME'S BRUTAL ROLLBACKS

Bolsonaro's ascension to Brazil's presidency would not have been possible without the staunch support of Brazil's agribusiness sector, particularly the industry's hard right wing ruralista political caucus. In naming members of his cabinet, Bolsonaro returned the favor, appointing seven ruralista representatives to key posts, including his Chief of Staff.⁶¹ The largest bloc in Brazil's Congress, the ruralista Parliamentary Farming Front (FPA) control 225 seats of 517 in the House of Representatives and 32 seats of 81 in the Senate.⁶²

It is therefore not surprising that the Bolsonaro regime's agricultural policies feature considerable overreach into the realms of environmental and human rights policy, with limited checks on their power. An examination of cabinet members implementing these policies provides an understanding of the administration's aggressive stance toward forest conservation and indigenous land rights.

Brazil's Environment Minister Ricardo Salles, for example, is a convicted environmental criminal⁶³ who has moved to curtail the ability of the federal agency IBAMA to enforce environmental law while easing regulations to favor industry, particularly agribusiness and mining.⁶⁴ He has also proposed dissolving Brazil's multi-stakeholder National Environmental Council CONAMA to replace it with a small industry-friendly panel,⁶⁵ and is overseeing a project to pardon past environmental crimes.⁶⁶ His efforts as Minister have positioned his office in diametric opposition to his official role as the country's institutional environmental steward.⁶⁷

Meanwhile, Bolsonaro's Minister of Agriculture Tereza Cristina has a long history of conflict with indigenous communities, whose lands her family fraudulently occupied to build immense wealth and political influence.⁶⁸



TEREZA CRISTINA, BOLSONARO'S 'POISONED MUSE'



Nowhere is the influence of Brazil's agroindustrial sector more apparent than in Bolsonaro's selection of Tereza Cristina Corrêa da Costa Dias to run the Ministry of Agriculture. Ms. Dias is among Brazil's most influential ruralistas, having headed the powerful Parliamentary Farming Front (FPA) prior to her appointment to the Ministry of Agriculture.⁶⁹ As such, her tenure is defined by unwavering support for interests behind cattle ranching and industrial farming of export commodities, which tend to be resolutely opposed to Brazil's socio-environmental protections.⁷⁰

Heiress to one of the most powerful and influential families in Mato Grosso do Sul, Tereza Cristina (as she is known in Brazil) began her political trajectory in the state, which was notable for various conflicts of interests surrounding her business interests.⁷¹ The Corrêa da Costa family has a long history of violence against indigenous peoples and traditional communities, environmental devastation, and the invasion and privatization of public lands.⁷² Her family background helps to explain the Minister's open animosity toward indigenous land rights and ecological protections, which have defined her political career.⁷³

First elected Federal Deputy in 2014, Tereza Cristina defined her mandate by attacking Brazil's indigenous movement and its allies through spearheading a dubious parliamentary inquiry committee (CPI) into supposed irregularities committed by FUNAI.⁷⁴ She also supported President Michel Temer's 2017 "Land Grabbing Decree" - endorsed by fellow ruralistas vying for vast tracts of land in Brazil's Amazon and Cerrado regions - which sanctions land grabbing and associated deforestation.⁷⁵

Tereza Cristina is perhaps best known for her strident efforts to approve of a range of pesticides for use in Brazil, many of which are banned internationally, efforts that won her the nickname "Muse of Poison."⁷⁶ Namely, while leading the FPA she was among the leading voices for legislation known as the "Poisoned Package,"⁷⁷ fueled by heavy spending from the pesticide industry.⁷⁸ While this bill failed to win approval in 2018, the Agriculture Ministry dispensed with congressional oversight and approved 152 new pesticides in the first 100 days of the Bolsonaro government.⁷⁹

Tereza Cristina is also among the leading ruralistas calling for indigenous lands to be opened to agribusiness and mining.⁸⁰ Such practices are currently illegal under the 1988 Brazilian Constitution, however she claims that legislation is being prepared to facilitate the entry of highly destructive industrial activities in native lands.⁸¹

Photo: Wikipedia Commons

Nabhan Garcia: From Militiaman to Overseer of Land Reform



Luiz Antonio Nabhan Garcia, Tereza Cristina's principal advisor overseeing land reform issues, is the longtime president of the Ruralista Democratic Unity (UDR), an entity that defends the interests of large rural landowners and is antagonistic to indigenous land demarcations and Brazil's agrarian reform movement.⁸² An owner of extensive cattle ranching operations, Mr. Garcia is a virulent opponent of Brazil's Landless Workers Movement (MST) and organized heavily - and illegally - armed rural militias to intimidate its members.⁸³

Among Mr. Garcia's key tasks as the Agriculture Ministry's Special Secretary on Land Issues is to oversee indigenous land demarcations processes in order to scrutinize the demarcation of indigenous territories from the last 10 years in order to identify administrative errors that could lead to their cancelation.⁸⁴ He has also moved to force FUNAI - an institution he claims serves "a disservice to [Brazil]" - to hand over its mapping data with the clear objective of paralyzing hundreds of pending titling processes.⁸⁵

While Mr. Garcia laments the "ideological bias" that has tainted Brazil's long-deferred land reform process,⁸⁶ he is among the country's most inappropriate administrators of the complex and pressing need to title and protect threatened indigenous lands. This paradox is entirely in keeping with the composition of the Bolsonaro regime.



Photo: Marizilda Cruppe / Greenpeace



Photo: Greenpeace / Daniel Beltrá

Tereza Cristina's suspect ties to JBS, one of Brazil's most corrupt companies

JBS is the largest animal protein company in the world and the leading beef processor, with operations in Brazil, Canada, the U.S. and Australia. The company has a notorious history of corruption in Brazil, where its employees, and particularly its former CEO Wesley Batista and former chairman Joesley Batista, have been linked to various bribery scandals,⁸⁷ including the bribing of three Brazilian presidents and an additional 1,829 elected officials,⁸⁸ the misappropriation of \$385 million in public funds,⁸⁹ and insider trading.⁹⁰

Globally, it has a daily slaughtering capacity of 80,000 bovines.⁹¹ JBS Brasil operates 35 beef processing facilities with a capacity of 34,200 bovines per day spread across 10 states, including several Amazon states.⁹² It regularly exports beef and beef products to destinations in the U.S. and Europe.⁹³

Tereza Cristina has a long commercial and political relationship with JBS. While serving as Mato Grosso do Sul state Secretary for Agrarian Development, she signed agreements with JBS granting it generous tax breaks and State credit to expand operations and was apparently rewarded with a R\$133,000 (US\$35,000) donation to her party's coffers in 2013.⁹⁴

State-provided fiscal incentives are at the center of a sprawling investigation into JBS' massive bribery scheme, wherein the Batista brothers doled out R\$150 million (US\$39 million) in bribes in Mato Grosso State alone between 2003 and 2016.⁹⁵ According to testimony from a Joesley Batista, 20-30% of these state funds were used as kickbacks to bribe lawmakers.⁹⁶ Tereza Cristina served as State Secretary during the majority of this period.⁹⁷

The Minister's cozy relationship with JBS has since soured, however. After personally signing a rental agreement for one of her family's farms with Joesley Batista⁹⁸ with projected profits of R\$1 million (US\$260,000), she failed to deliver more than 6,000 heads of cattle and was sued by the Batista brothers, forcing her to auction her farm.⁹⁹ She now owes JBS R\$4.5 million (US\$1.8 million) and is also under federal investigation for her role in granting fiscal incentives to the company.¹⁰⁰

Beef and soy: leading drivers of deforestation and rights violations

Two agricultural activities, cattle ranching and soy production, are the leading drivers of deforestation in Brazil. Ranching alone leads to approximately 80% of Amazon deforestation,¹⁰¹ with 80% of Amazon forests cleared since 2014 being occupied by cattle.¹⁰²

Meanwhile, soy-linked Amazon deforestation was largely eliminated by the 2006 Soy Moratorium, with 30% of soy's expansion linked to deforestation prior to the agreement dropping to only 1% following.¹⁰³ As a result, soy cultivation has exploded in the neighboring Cerrado biome, leading to the destruction of 105,000 square kilometers (40,541 square miles) of native forests since 2008, at a pace four times as rapid as the destruction of the Amazon during this period.¹⁰⁴ Additionally, the Cerrado soy boom has resulted in driving cattle ranching activities into the Amazon, causing mounting rainforest clearing there.¹⁰⁵

Brazil's cattle herd exceeds 200 million heads and generates \$123 billion annually.¹⁰⁶ The economic and environmental implications of these commodities extend to the global market: Brazilian soy¹⁰⁷ accounted for 14.3% of the country's total exports, generating \$31.0 billion in 2017¹⁰⁸ while cattle exports¹⁰⁹ accounted for about \$5.4 billion.¹¹⁰ In fact, Brazil leads the world in exports of both commodities.¹¹¹ If the world continues to provide a market for these commodities, these industries will enjoy considerable economic incentives to aggressively expand activities to the detriment of forest protections and indigenous land rights.



Photo: Rhett Butler, Mongabay

How international consumers, traders, and financiers help enable Brazilian companies guilty of illegal deforestation

This report exposes Brazilian companies that were among the most significant contributors to the country's growing wave of illegal Amazon deforestation between 2017 and 2019. Illegal deforestation heavily outweighs lawful deforestation in Brazil, with one study showing that 85% of rainforest cleared in Mato Grosso state in 2018 resulted from illicit activities.¹¹² Fined millions of dollars by the environmental enforcement agency IBAMA, these criminal operations supply a range of European and North American businesses and their consumers.

Our findings detail the supply chain links between Brazilian environmental offenders, who were fined millions of dollars by IBAMA since 2017,¹¹³ and 27 European and North American importing companies and traders, and received financing from dozens of private institutions, including major global asset managers and private banks.

These findings shed light on how some of Brazil's worst agroindustrial actors, including the commodity traders that do business with them, have significant ties to global markets while benefiting from flows of foreign capital, which allow their operations - and illegal activities - to expand further into intact forests.

By bringing to light these case studies, we can better understand how a flagrant disregard for Brazilian environmental law and human rights norms underpin the business activities of a segment of Brazilian agribusiness that is closely aligned with Bolsonaro's disastrous agenda. By drawing links to their global enablers, we can also understand how northern markets are complicit in this destruction.

The role of finance in Brazil's soy and cattle sectors

Foreign investors have enormous influence over what happens in the Brazilian Amazon. In particular, big banks and large investment companies play a critical role, providing billions of dollars in lending, underwriting and equity investment to soy and cattle companies. This capital and financial security enables agribusiness to maintain and expand operations, causing further devastation to the Amazon.

Many Americans and Europeans, in turn, have a direct stake in these financial institutions, either as shareholders or customers of big banks or through the retirement funds managed by asset managers.

Asset managers claim that they have little power over where investors decide to put their money - that their clients make all the decisions, but this is highly dubious. In fact, asset managers like BlackRock wield significant power over how assets are allocated and how shareholder votes are determined.



Photo: Greenpeace / Daniel Beltrá

COMMODITIES: Soy



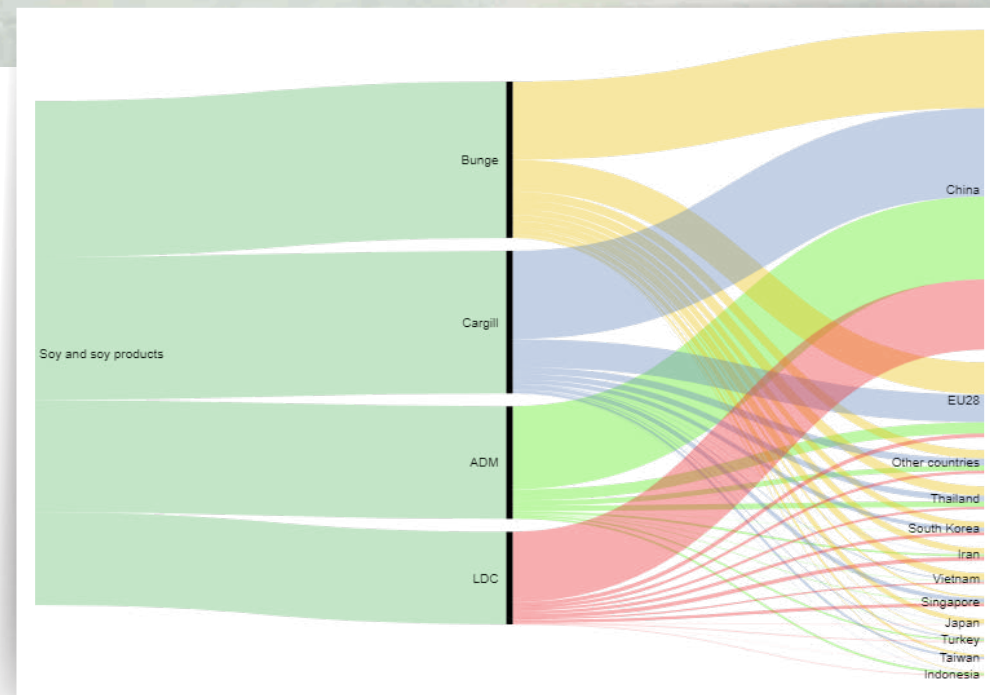
As cited above, the leading drivers of deforestation, both legal and illegal, in the Brazilian Amazon and Cerrado are the cattle ranching and soy industries, respectively.¹¹⁴ Together they account for 80% of Amazon deforestation.¹¹⁵

Major northern soy trading companies: employing global finance to drive the expansion of Brazil's agricultural frontier

In April 2018, five of the main agricultural traders in Brazil - ABC Indústria e Comércio SA, JJ Samar Agronegócios Eireli, Uniggel Proteção de Plantas Ltda, Cargill and Bunge Ltda. - were discovered purchasing 3,000 tons of soy and other grains from farms previously embargoed by IBAMA for destroying native vegetation of Cerrado biome. Known as Operation Shoyo, IBAMA applied environmental fines – both to traders and farmers – that surpassed R\$ 105 million (US\$ 27 million).¹¹⁶

While tracing Brazilian soy exports via international traders to end users in Europe and North America is highly challenging due to opaque supply chain data, the foreign capital these companies rely on can be identified.

Our findings broadened the analysis of the financing of the two major international traders fined by IBAMA - Bunge and Cargill - to include other members of the so-called ABCD group made up of Archer Daniels Midland (commonly known as 'ADM'), Bunge, Cargill, and Louis Dreyfus, which dominate the global grain trade.¹¹⁷



Brazilian soy distribution flows of the ABCD traders.

Source: Panjiva (n.d.), "Brazil – export records", online: <https://panjiva.com>, viewed in March 2019

FINDINGS ON U.S. AND EU FINANCING OF GLOBAL SOY TRADERS



ADM

The twenty largest U.S. and EU shareholders of ADM hold over 296 million shares in the company, valued at \$12 billion. These 20 companies collectively hold 53% of all shares in ADM, with State Farm holding over 10% of shares and asset managers Vanguard, BlackRock, and State Street each holding more than 6% of shares respectively. Twenty-four multinational banks have also served as significant creditors, providing nearly \$16.5 billion in loans and underwriting between 2013 and 2018. Five U.S. and E.U. banks, Barclays, Bank of America, Citigroup, JPMorgan Chase, and BNP Paribas, each provided more than a billion dollars in credit apiece.¹¹⁸

BUNGE

The twenty largest U.S. and EU shareholders of Bunge hold nearly 75 million shares in the company, valued at \$40 billion. These 20 companies collectively hold 53% of all shares in Bunge, with Vanguard holding 9.9% of shares and T. Rowe Price and BlackRock each holding more than 6% of shares, respectively. Twenty-nine multinational banks and other financial institutions also provided Bunge a total of over \$3 billion in loans between 2013 and 2018, with Farm Credit Services Commercial Finance Group providing \$856 million and ABN Amro, ING Group, JPMorgan Chase, and Deutsche Bank each providing over \$100 million in credit.¹¹⁹

CARGILL

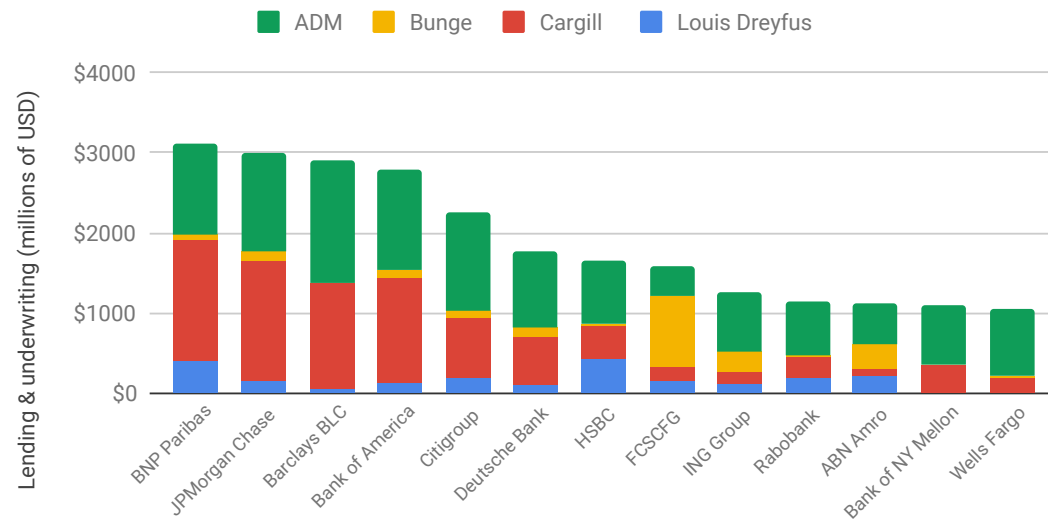
United States-based Cargill is the largest privately held company in the world, with the Cargill family itself still owning 88% of the company.¹²⁰ Nevertheless the company relies heavily on capital from financial institutions in the U.S. and EU: between 2013 and 2018, Cargill received \$12.9 billion in loans and underwriting from 34 financial institutions in these regions. Four U.S. and EU banks, BNP Paribas, JPMorgan Chase, Barclays, and Bank of America each provided more than one billion dollars during this time period.¹²¹

LOUIS DREYFUS COMPANY

Like Cargill, Netherlands-based Louis Dreyfus is a private company. However, it also receives significant finance from other actors. Between 2013 and 2018, it received over \$4.8 billion in lending and underwriting from 36 U.S. and EU financial institutions, with HSBC, BNP Paribas, Credit Suisse, Crédit Agricole, and ABN Amro as the largest financiers.¹²²

Data on shareholders and value of holdings current as of March 2019; complete data available in Appendix A.

U.S. and E.U. financial institutions providing over \$1 billion in credit to ABCD commodity traders



Value of investments in ACBD commodity traders by top five U.S. and E.U. shareholders

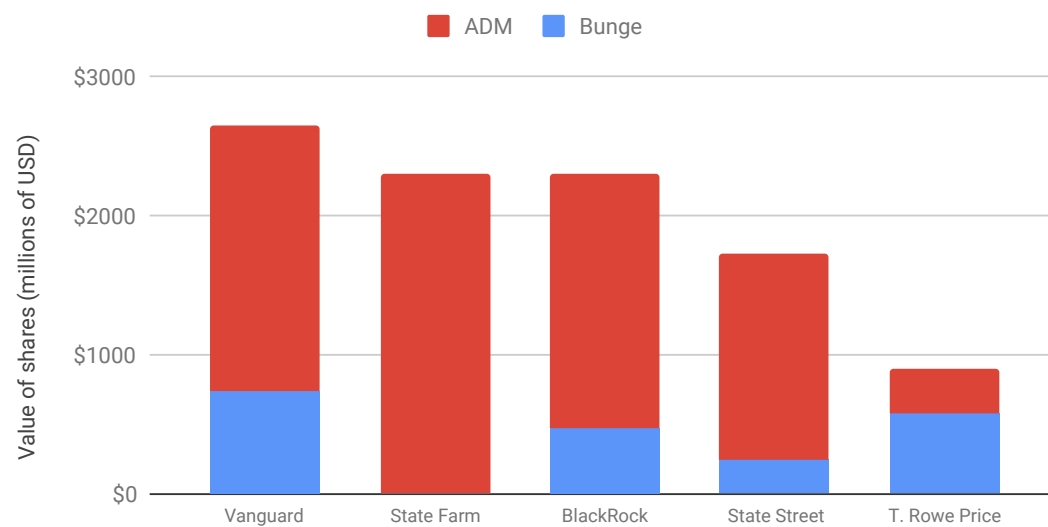


Photo: Lou Dematteis

BlackRock: Financing Climate Destruction from Tar Sands to the Amazon

BlackRock is the world's largest asset manager, with nearly US\$6 trillion in assets under management. It is also the world's largest holder of shares in the companies most responsible for climate change, like the those continuing to expand extraction of thermal coal. In total, its holdings amount to nearly 9.5 gigatons of CO2 equivalent emissions from investments in coal and oil and gas reserves¹²³ - almost the same level of emissions emitted globally each year.¹²⁴

Unsurprisingly, our research finds that BlackRock is also a key financier of the agribusiness giants most implicated in deforestation in the Brazilian Amazon. BlackRock is in the top ten - and often the top five - of institutional investors holding shares in all the agribusiness giants that are publicly traded. According to our research, BlackRock holds over \$2.5 billion of shares in these companies, including over 5% of available shares in ADM and Bunge; finance researchers call ownership above 5% of all shares 'blockholding' and generally assume it to imply significant influence over corporate governance.¹²⁵

BlackRock has supported the Paris Climate Accord and its CEO, Larry Fink, has been dubbed the "conscience of Wall Street"¹²⁶ for his exhortations to companies to "benefit all of their stakeholders, including shareholders, employees, customers, and the communities in which they operate."¹²⁷

Yet BlackRock's statement after Brazil's election appears to celebrate Bolsonaro's win, lauding his commitment "to building on the reform agenda put in place over the past two years."¹²⁸ And since Bolonaro's election BlackRock seems to look with even greater favor on the administration; Mr. Fink has lauded the "significant opportunities" to be found for investors in Brazil, and announced the expansion of the firm's operations in the country.¹²⁹

This doublespeak on Brazil, agribusiness, and climate action are why Amazon Watch joined with partner organizations to form the BlackRock's Big Problem campaign - BlackRock has a big climate and human rights problem, and the campaign will hold it accountable.

COMMODITIES: Beef



Our research, described below, identifies three Brazilian ranching companies with links to illegal deforestation and international supply chains, including major Brazilian meatpackers and the global leather trade. While the number of companies profiled here is small, their illegal activities should be seen as emblematic of Brazil's Amazon ranching industry as a whole, which employs various methods to evade detection of supply chain links to forest destruction and rights abuses.¹³⁰

Agropecuária Santa Barbara Xinguara (AgroSB) - Daniel Valente Dantas

The largest fines for illegal Amazon deforestation in 2017 were levied against the ranching company *Agropecuária Santa Barbara Xinguara* (AgroSB), totalling R\$ 77.4 million (US\$ 20 million). AgroSB was also fined in 2018.¹³¹ AgroSB is owned by Opportunity Fund, which is run by the well-known banker **Daniel Valente Dantas**.¹³²

Mr. Dantas has a notorious record of financial crimes in Brazil.¹³³ Named as the leader of a criminal organization specialized in money laundering and tax evasion, Dantas was arrested in 2008 for bribing public servants, and his ranching empire of 27 farms spanning 500,000 hectares with 453,000 heads of cattle seized by the state.¹³⁴ He recovered his empire, however, and his Amazon operations have gone on to devastate the forests of Pará state and violate workers' rights.¹³⁵

AgroSB has links to the Brazilian meatpacking firm JBS Brasil. Anecdotal evidence shows that cattle from AgroSB farms is slaughtered in JBS facilities, with the company's Fazenda Espírito Santo in Pará competing in February 2017 for the honor of being named "best batch of January animals slaughtered at JBS."¹³⁶

Agropecuária Rio da Areia LTDA - Édio Nogueira (CEO)

Between 2017 and 2018 the Brazilian ranching company *Agropecuária Rio da Areia*, owned by businessman Édio Nogueira, was fined five times for illegal Amazon deforestation, totaling R\$ 4,758,300 (US\$ 1.2 million).¹³⁷

The company states on its website that it is "one of the country's largest beef cattle breeding companies, supplying to Brazil's leading slaughterhouses such as JBS, Marfrig, Minerva, among others."¹³⁸

Brazilian meat-packers: driving forest destruction with foreign capital

Alongside JBS, Marfrig and Minerva are the three leading beef processors in Brazil and have major operations in the Amazon, where they account for around 70% of all cattle slaughtered.¹³⁹ JBS and Minerva also operate slaughterhouses in the Cerrado Biome. JBS Brasil, Marfrig and Minerva all regularly export beef and beef products to destinations in the U.S. and Europe.¹⁴⁰

While tracing Brazilian beef exports to end users in Europe and North America is highly challenging due to opaque supply chain data, the private foreign capital these companies rely on can be identified.

To understand these financial links, we identified the top 20 shareholders and creditors based out of the United States and Europe using Thomson EIKON and the Bloomberg Terminal.

Data on shareholders and value of holdings current as of March 2019; complete data available in Appendix A.

FINDINGS ON U.S. AND EU FINANCING OF BRAZILIAN BEEF COMPANIES



JBS

The twenty largest U.S. and EU shareholders of JBS hold nearly 500 million shares in the company, valued at \$2 billion.¹⁴¹ Within this set of companies, Capital Group, BlackRock, Fidelity Investments, and Vanguard hold the most significant equity investments in JBS. Three multinational banks - Santander, JPMorgan Chase, and Barclay's - also provided JBS a total of \$1.18 billion in underwriting between 2013 and 2018.¹⁴²

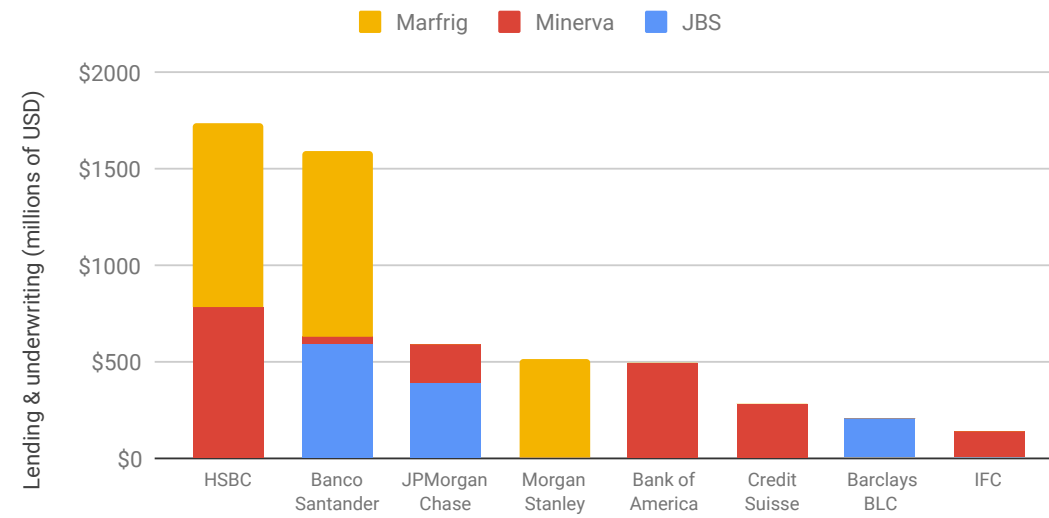
MARFRIG

The twenty largest U.S. and EU shareholders of Marfrig hold nearly 114 million shares in the company, valued at \$178 million. Of these, Brandes Investment Partners, Storebrand, Azimut, and Vanguard hold the most significant equity investments in Marfrig. Three multinational banks - HSBC, Santander, and Morgan Stanley, have provided a total of \$2.43 billion in underwriting to the company between 2013 and 2018.¹⁴³

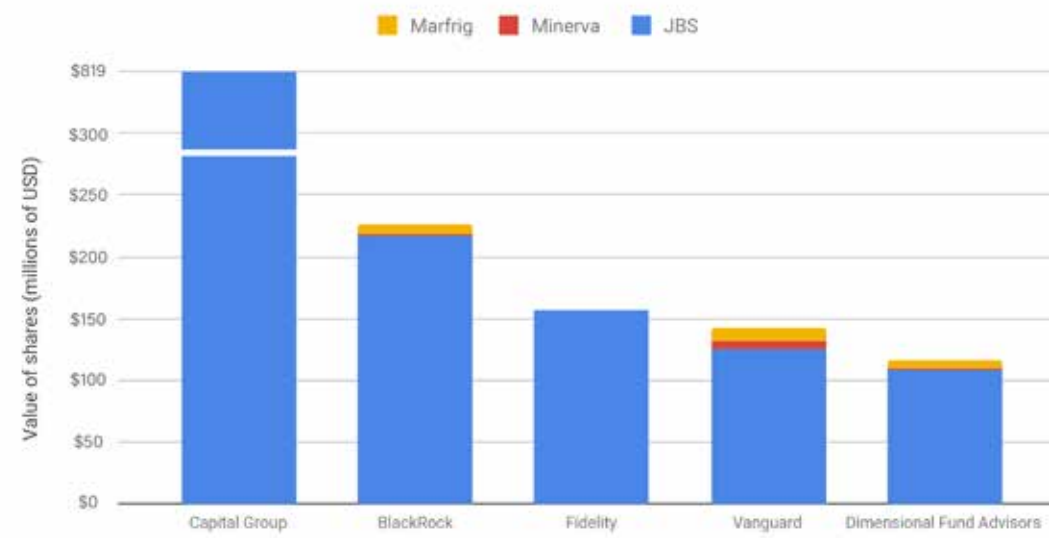
MINERVA

The twenty largest U.S. and EU shareholders of Minerva hold over 30 million shares in the company, valued at \$45 million. Within this set of companies, BNP Paribas, Credit Suisse, Vanguard, and Invesco hold the most significant equity investments in Minerva. Five multinational banks - HSBC, Bank of America, Credit Suisse, JPMorgan Chase, and Santander, have provided a total of \$1.8 billion in underwriting to Minerva between 2013 and 2018 while the International Finance Corporation provided a \$138 million loan to the company.

U.S. and E.U. financial institutions providing credit to major Brazilian beef exporters



Value of investments by top five U.S. and E.U. shareholders in major Brazilian beef exporters



Photos: Fernanda Ligabue / Greenpeace; Deaniel Beltrá / Greenpeace

COMMODITY: Leather



Brazil is a major exporter of leather derived from its cattle herd, with 80% of this commodity destined for the export market.¹⁴⁴ Explicitly linked to Brazilian ranching, it shares the industry's oversized ecological footprint.¹⁴⁵ Findings identified one Brazilian company exporting leather to five Italian tanneries.

Grupo BIHL: Agropecuária MALP & Frigorífico Redentor - The Bihl Family

The company Agropecuária MALP is part of the Grupo BIHL, a large slaughterhouse and cattle raising group based in Mato Grosso state. Between 2017-2018, Agropecuária MALP was fined R\$ 3.8 million (US\$ 1 million) for illegal deforestation in Mato Grosso.¹⁴⁶

Owned by the Bihl family, the Grupo BIHL was a target of the Brazil's Federal Police investigation "Operation Abate" in 2009 for giving bribes to public servants and inspectors in the company's operations.¹⁴⁷ Four of the Bihl brothers were arrested as a result.¹⁴⁸

The meat processing company Frigorífico Redentor is a subsidiary of Grupo Bihl and supplies bovine leather to a range of leading Italian tanneries. Located in the Vicenza region of Northern Italy, these tanneries supply leather for a variety of products domestically and internationally, from footwear to furniture and car upholstery. In addition to various supply chain links between Frigorífico Redentor and Italian tanneries companies, there are indirect links to a U.S. accessories manufacturer and retailer.

Between 2017-2018, Frigorífico Redentor shipped leather to the following Italian tanneries:¹⁴⁹

- » **Rino Mastrotto Group** - two shipments totaling 162 tons;
- » **Faeda** - ten shipments totalling 483 tons;
- » **Conceria Cadore** - four shipments totalling 219 tons;
- » **Conceria Cristina** - five shipments totaling 99 tons;
- » **Italpelli** - thirteen shipments totalling 530 tons.

During this period, the U.S. company **Brighton Collectibles** - sold across the U.S. in over 180 Brighton Collectibles stores as well as more than 4,000 specialty boutiques and online¹⁵⁰ - received twenty-eight shipments of bovine leather totalling 4.4 tons from Italian tannery Faeda.¹⁵¹ It is unknown whether leather sourced by Faeda from Frigorífico Redentor was supplied to Brighton Collectibles.



Photo: Rhett Butler / Mongabay; Fernando Ligabue / Greenpeace

COMMODITY: Timber



Brazilian timber companies are frequently linked to rampant illegal deforestation¹⁵² and the falsification of logging permits to escape the scrutiny of purchasers.¹⁵³ One study showed that between 2011 and 2012, 78% and 54% of logging in Pará and Mato Grosso states, respectively, was illegal.¹⁵⁴ Findings identified three companies exporting timber to fourteen companies in Belgium, the Netherlands, Denmark, France, the United Kingdom, and the United States.

Benevides Madeiras & Argus - Arnaldo Andrade Betzel

Mr. Arnaldo Andrade Betzel is a partner in several companies in the state of Pará, and has longtime operations in the timber sector. He owns the timber companies Benevides Madeiras and the fruit pulp company Argus. Between 2017-2018 Mr. Betzel was fined R\$ 2.2 million (US\$ 570,00) for illegal deforestation in Pará.¹⁵⁵

Benevides Madeiras has extensive supply chain links with various large European timber retailing companies.

- » **Vandecasteele Houtimport (Belgium)** is a family-owned timber importer specialized in the import, trading and export of a variety of woods, including tropical hardwood from South America.¹⁵⁶ Mostly targeting the building and construction sectors,¹⁵⁷ the company was voted best Belgium timber company 2018-2019 in the Netherlands,¹⁵⁸ its primary market.¹⁵⁹ Between 2017-2018 the company received nine shipments of timber from Benevides Madeiras totalling 517 tons.¹⁶⁰
- » **Vogel Import & Export (Belgium)** claims to be leading importers of South American tropical hardwood to Europe and world leader in the distributors of wooden sticks.¹⁶¹ In 2018, the company imported 80 tons of timber products from Benevides Madeiras.¹⁶²
- » **Hoogendoorn Hout (Netherlands)** is a supplier of timber and related materials with a focus on the Dutch market. Between 2017-2018, the company imported 14 shipments of timber from Benevides Madeiras totalling 714 tons.¹⁶³
- » **Global Timber (Denmark)** claims to house Northern Europe's largest hardwood warehouse, serving Scandinavia and large parts of Europe.¹⁶⁴ In 2018, Global Timber imported 52 tons of timber from Benevides Madeiras.¹⁶⁵



- » **Guillemette & Cie (France)** imports 19,000 m³ of timber annually from global suppliers, including Brazil.¹⁶⁶ Between May 2018 and January 2019, Guillemette & Cie imported four shipments of timber from Benevides Madeiras totalling 266 tons.¹⁶⁷
- » **Groupe Rougier (France)** is a supplier of tropical timber, with activities in the international trade and distribution of tropical timbers.¹⁶⁸ Its wholly-owned subsidiary Rougier Sylvaco Panneaux imports and markets a wide range of wood, with clients including industry, distributors and traders.¹⁶⁹ Between 2017-2018 Rougier Sylvaco Panneaux received three shipments from Benevides Madeiras totalling 125 tons.¹⁷⁰

Mr. Betzel's company Argus exports fruit pulp to the German company **Acai GmbH - Fine Fruits Club**, which ships organic fruit products (purees, smoothies, powders) to German organic chain stores, such as Alnatura and Denn's.¹⁷¹ In 2018, Acai GmbH imported 9.1 tons of acai pulp from Argus.¹⁷²

Photo: Greenpeace / Daniel Beltrá



Nordisk Timber Eireli - Edma Lamounier Barros

Nordisk Timber Eireli is a British company that extracts and commercializes native wood from the Amazon. The company's Brazilian business liaison is Mrs. Edma Lamounier Barros, a public officer in Banco do Brasil.¹⁷³ Between 2017-2018, Nordisk was fined R\$ 15,131,000 (US\$ 3.9 million) for lack of environmental oversight over traded wood.¹⁷⁴

Various supply chain links exist between Nordisk Timber Eireli and large European and U.S. timber retailing companies.

- » **Vandecasteele Houtimport (Belgium):** between 2017-2018, the company imported 437 tons of timber from Nordisk Timber Eireli.¹⁷⁵
- » **Vogel Import & Export (Belgium):** in 2018, the company imported 734 tons of timber from Nordisk Timber Eireli.¹⁷⁶
- » **Tradelink Group (UK)** procures, ships, manufactures, warehouses and markets various timber products with hardwoods procured in South and North America and Asia.¹⁷⁷ In 2018, the company imported 1,036 tons of timber from Nordisk Timber Eireli.¹⁷⁸
- » **GWW Houtimport (Netherlands)** is a leading supplier of timber for civil engineering, road construction and hydraulic engineering. In 2018, the company imported 1,122 tons of timber from Nordisk Timber Eireli.¹⁷⁹
- » **Hoogendoorn Hout (Netherlands)** between 2017-2018, the company imported 526 tons of timber from Nordisk Timber Eireli.¹⁸⁰
- » **Van den Berg Hardhout (Netherlands)** is a wholesaler of hardwood, providing timber for a wide variety of projects from construction to terraces and outdoor furniture.¹⁸¹ Between 2017-2018, the company imported 4,403 tons of timber from Nordisk Timber Eireli.¹⁸²
- » **Northwest Hardwoods (U.S.)** claims to be the largest manufacturer and supplier of hardwood in the U.S.,¹⁸³ with sales offices in Europe, the Middle East, Africa, Asia and Oceania.¹⁸⁴ Between 2017-2018, the company imported 60 tons of timber from Nordisk Timber Eireli.¹⁸⁵

Tradelink Madeiras

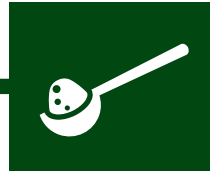
Tradelink Madeiras is a Brazil-based subsidiary of the UK-based Tradelink Group.¹⁸⁶ Notorious for repeatedly violating Brazilian environmental law, Tradelink Madeiras was fined in 2016 for selling illegal wood.¹⁸⁷ It received 11 fines for illegal deforestation in 2017, totalling R\$ 1.0 million (US\$ 260,000),¹⁸⁸ and was denounced for using slave labor in its supply chain the same year.¹⁸⁹

Tradelink Madeiras has supply chain links to various large European and North American timber retailing companies.

- » **Global Timber (Denmark)** claims to house Northern Europe's largest hardwood warehouse, serving Scandinavia and large parts of Europe.¹⁹⁰ It supplies the furniture, door, and window industries as well as wood for kitchens, terraces, floors and stairs, and the construction and maritime industry.¹⁹¹ Between 2017-2019, Global Timber imported 482 tons of timber from Tradelink Madeiras.¹⁹²
- » **Keflico (Denmark)** is a hardwood timber and board product supplier in Denmark. It supplies exclusively to timber dealers and construction markets as well as targeted products for the wood and board industry.¹⁹³ Between 2017-2018 the company imported 1,004 tons of timber from Tradelink Madeiras.¹⁹⁴
- » **Boa-Franc (Canada)** claims to be the North American leader in the manufacture of superior quality prefinished hardwood floors, including the Mirage hardwood flooring brand. Mirage Hardwood Floors are sold in many North American outlets.¹⁹⁵ Between 2017-2018, the company imported 257 tons of timber from Tradelink Madeiras.¹⁹⁶
- » **Robinson Lumber Company (U.S.)** operates multiple U.S. locations as well as locations in Central and South America and has a European sales office Belgium.¹⁹⁷ Between 2017-2018, the company imported 199 tons of timber from Tradelink Madeiras.¹⁹⁸
- » **Thompson Mahogany Company (U.S.)** claims to be one of the U.S.' outstanding suppliers of luxury hardwoods from South America and to be one of the largest direct importers of luxury hardwood lumber and decking in the U.S.¹⁹⁹ Between 2018-2019, the company imported 261 tons of timber from Tradelink Madeiras.²⁰⁰

Photo: Greenpeace / Daniel Beltrá

COMMODITY: Sugar



While new plantations have been banned in the Brazilian Amazon since 2008,²⁰¹ Amazonian sugarcane cultivation for biofuel production nonetheless covers more rainforest lands compared to any other biofuel crop.²⁰² However, it is primarily grown in the Cerrado where it has also contributed to significant deforestation,²⁰³ where producers have faced repeated allegations of using slave labor.²⁰⁴ Findings identified one company exporting sugar to the United States, United Kingdom, and Canada.

Usina Trapiche & Temape Group- Luiz Antonio de Andrade Bezerra

Usina Trapiche and the Temape Group, owned by Luiz Antonio de Andrade Bezerra, was fined R\$ 3 million (US\$ 770,000) for illegally clearing forests in Pará state.²⁰⁵ Usina Trapiche is one of the main producers of sugarcane, sugar and ethanol in Northeastern Brazil, where the company's human rights violations made it a target of an OXFAM-led campaign resulting in Pepsico, Coca-Cola FEMSA group, and others ceasing purchasing from the company.²⁰⁶

Research identified supply chain relationships between Usina Trapiche and two sugar companies between 2017-2018.

- » **ASR Group (U.S.)** is one of the world's largest integrated sugar businesses and the largest sugar refiner in the world. Key brands in North America include Domino, C&H, Florida Crystals and Redpath brands.²⁰⁷ In 2017, the company imported one shipment of sugar from Usina Trapiche, totalling 7,535 tons.²⁰⁸
- » **ED&F Man (UK / Canada)** is one of the world's leading sugar traders globally, refining and processing sugar that it markets via its own brands, including Royal Ingredients in the United States.²⁰⁹ In 2017, the company imported one shipment of sugar from Usina Trapiche totalling 1,562 tons.²¹⁰



Photos: Jeanny Tsai; Greenpeace

FOLLOW THE MONEY, PRESS FOR REFORM

This report aims to expose and influence a key set of actors in Brazil and globally and send a signal to the Bolsonaro regime that its deplorable behavior jeopardizes the international market relationships upon which much of its economic and political power is derived.

This report not only draws attention to the social and environmental disaster unfolding in Brazil, but also to those actors implicated in this unacceptable situation. The findings above uncover the supply chain and financial links that enable Brazilian corporate actors linked to recent environmental and human rights crime in the Amazon and Cerrado biome. While the backing of global traders and financiers assist today's mounting criminality, violence, and environmental destruction in Brazil's rural sector, they can also serve as an effective leverage point to influence their conduct.

Doing business with these and other related companies exposes global importing companies and financial institutions to reputational, operational, and regulatory risks.²¹¹ Conversely, their links to problematic actors and industries in Brazil could allow these global companies to become influential industry leaders by taking action to address these risks in their own supply chains and portfolios.

While only a relatively small set of Brazilian companies are profiled here, their actions are indicative of the dangerous trends being advanced by the Bolsonaro regime, which jeopardize these irreplaceable biomes, their indigenous and traditional communities, and ultimately global climate stability. As such, these findings seek to provide new tools and open new avenues to reform the worst elements of the country's agroindustrial sector, and by extension the Bolsonaro regime, ultimately upholding and restoring critical socio-environmental safeguards.

Having identified vulnerabilities within key Brazilian markets backing Bolsonaro, the next step is to put them to immediate use, given the urgency of halting his destructive agenda. As such, this report should inspire a people-powered movement, where Brazilian and international civil society may have a say over the future of the Amazon and, by extension, the future of the global climate.



Photo: Mídia Ninja/Mobilização Nacional Indígena

RECOMMENDATIONS

This report exposes the risks behind doing business with companies directly tied to illegal deforestation under the brutality of Bolsonaro's Brazil. Europe and United States-based companies and financiers identified here have now been made aware of their enabling relationship to the polemic and immoral behavior of actors within their supply chains and portfolios, and should swiftly act upon this information to minimize exposure to this risk.

Recommendations to financial institutions:

- » All financial institutions with lending, underwriting or investments in companies operating in the Brazilian Amazon should commit to a No Deforestation policy. Such a policy should include, but not necessarily be limited to, the following commitments from the signatory financial institutions:
 - » Require agribusiness companies that are recipients of loans/underwriting/investment to map of all suppliers
 - » Require agribusiness companies that are recipients of loans/underwriting/investment report any investigations, indictments or fines issued for deforestation and/or land grabbing.
 - » Monitor agribusiness companies operating in sensitive ecosystems like the Amazon rainforest for any evidence of deforestation.
 - » [In the case of equity investors, the policy should include:] If shareholder resolutions are presented that support greater transparency in and respect for human rights, forest protection, and/or compliance with the Paris Climate Accord, the institution must vote in favor of the resolution.
- » If companies are unable or unwilling to cooperate with these requirements, or a company is found to have violated the standard, the financial institution should cease its financial relationship with the company as soon as legally possible.

Recommendations to importing companies:

- » All European and North American importing companies identified in this report should conduct their own due diligence into the problematic supply chain connections outlined here;
- » If findings conclusively link supply chains to commodities exported by Brazilian companies identified in this report, importing companies should exclude them from supply chains for future imports and seek alternative suppliers;
- » Importing companies should rigorously implement Zero Deforestation policies to ensure that all high risk commodities are free of any deforestation or conversion of natural ecological systems;
- » Companies importing timber should employ due diligence measures to ensure that timber is cut legally and in a manner that does not degrade or fragment forests, nor violate human rights, and recognize that Brazil's licensing system is not sufficient to ensure legality;
- » Importing companies should implement commodity traceability standards to the point of origin and utilize transparent monitoring systems;
- » Importing companies should make their internal due diligence findings, traceability standards, and communications with Brazilian suppliers transparent and available to the public.

Recommendations to European policymakers

- » The European Commission should propose new laws that guarantee that neither products sold in the EU, nor the financial markets underpinning them, are destroying the Amazon and Cerrado biomes, displacing indigenous communities, and driving land grabs and other human rights abuses;
- » The EU should make it mandatory for companies to be able to trace the source of the forest or agro-commodities they import;
- » The agreement should include binding, enforceable provisions to end deforestation, respect customary tenure rights, and implement the Paris Climate Agreement;
- » The European External Action Service should strengthen the implementation of the EU Action Plan on Human Rights and Democracy and include more proactive consultation with Brazilian civil society organisations;
- » The EU should also monitor and respond to human rights violations and strengthen human rights defenders' protection mechanisms. For those most at risk, including indigenous Peoples and environmental defenders, the EU should provide direct, urgent support where required, including through political representations.

Recommendations to allied organizations:

- » Allied NGOs and research institutions should conduct new independent investigative studies into the supply chain and financial links of northern importing companies and the financial relationships with problematic Brazilian companies;
- » Allied NGOs should collaborate on market campaign activities to target strategic actors identified here - and in forthcoming research - among European and North American importing companies and financial institutions;
- » Organizations working with European policymakers should encourage the European Commission to adopt the rigorous policy recommendations listed here.

The companies, financiers, and policymakers cited here will likely only adopt these recommendations if concerned individuals and organizations bring this report's findings to their attention, and press these institutions to carry them out. This outcome relies upon a movement, emanating from Brazilian civil society and carried in solidarity within the countries in which companies, financiers, and policymakers are based.



Photos: Jenny Tsai; Maira Irigaray

CONCLUSION

While this report scrutinizes the Bolsonaro regime and corporate criminals operating in the Brazilian Amazon and Cerrado, it should not be seen as deflecting responsibility from many developed countries such as the United States, which are also responsible for environmental mismanagement, short-sighted economic policy, human rights abuses, and political backsliding. Rather, this study is an effort to address an emergency facing a region that is irreplaceable, critical to our collective survival, and the ancestral home of many indigenous peoples.

Global solidarity with Brazil's indigenous and environmental movements can make the difference at this critical moment. The Brazilian government's sensitivity to its image abroad and its increasing reliance on international corporate and financial actors to remedy its ailing economy creates a unique opportunity for the international community to apply pressure upon those actors most responsible for today's crisis, and upon global private sector entities that sustain their unacceptable behavior. These efforts, alongside Brazilian social movements advancing socio-environmental reform, will advance a constructive agenda to halt pressing threats.

This report, and the recommendations it makes, contributes to the growing global movement for political and corporate accountability. To be truly successful, this campaign must be informed by Brazilian activists, particularly Brazil's National Indigenous Movement, convene a coalition of international partners, and garner significant resources to continue to link corporate criminals in Brazil with their supply chain and financial connections. The tools put forward in this report are designed to be replicable, allowing similar tactics to be deployed in other countries facing similar and related scenarios.

Most of all, this report is meant to send a signal, to bad actors and the markets that sustain them, that we will no longer tolerate business as usual. In a world faced with climate catastrophe, growing disregard for human rights and dignity, and a false dichotomy of economic growth versus environmental balance, it is our collective responsibility to make change.



Photo: Jeanny Tsai

1.1 JBS

No unmatured credits provided to JBS in Brazil or its international debt issuing vehicles involving European or North American financial institutions could be identified. For the period from 2013 to 2018, this research identified three European and North American financial institutions as underwriters of bond issuances by JBS (Table 1).

TABLE 1 JBS European and North American creditors (2013-2018, US\$ mln)

INVESTOR	COUNTRY	UNDERWRITING (US\$ MLN)
Santander	Spain	589
JPMorgan Chase	U.S.	388
Barclays	UK	202
TOTAL:		1,179

Source: Thomson EIKON (2019, April), JBS: Bond issuances, viewed in April 2019; Bloomberg (2019, April), JBS: Aggregated debt, viewed in April 2019; JBS (2018, October 18). JBS Announces US\$500 Million in Senior Notes and Liability Management Exercise. Additionally, JBS received various times lease financing from Daimler Financial Services (Germany), Rabobank (Netherlands), Volkswagen Financial Services (Germany) and Volvo Financial Services (Sweden) in the period from 2013 to 2018. This is financing from BNDES provided through the respective intermediary in support of agriculture companies.[i] Only financing from Daimler Financial Services (Germany) and Volkswagen Financial Services (Germany) is not matured yet (Table 2).

TABLE 2 JBS European and North American creditors (2013-2018, US\$ mln)

INVESTOR	COUNTRY	LEASE FINANCING
Volkswagen Financial Services	Germany	18.2
Daimler Financial Services	Germany	0.2
TOTAL:		18.4

Source: Thomson EIKON (2019, April), JBS: Bond issuances, viewed in April 2019; Bloomberg (2019, April), JBS: Aggregated debt, viewed in April 2019; JBS (2018, October 18). JBS Announces US\$500 Million in Senior Notes and Liability Management Exercise. Additionally, JBS received various times lease financing from Daimler Financial Services (Germany), Rabobank (Netherlands), Volkswagen Financial Services (Germany) and Volvo Financial Services (Sweden) in the period from 2013 to 2018. This is financing from BNDES provided through the respective intermediary in support of agriculture companies.[i] Only financing from Daimler Financial Services (Germany) and Volkswagen Financial Services (Germany) is not matured yet (Table 2).

TABLE 3 Top 20 European and North American institutional shareholders of JBS (31 March 2019)

RANK	INVESTOR	COUNTRY	NO. SHARES	% OF SHARES	VALUE (US\$ MLN)
1	Capital Group	U.S.	230,458,741	8.4	819
2	BlackRock	U.S.	56,426,693	2.1	217
3	Fidelity Investments	U.S.	43,880,955	1.6	157
4	Vanguard	U.S.	35,198,267	1.3	126
5	Dimensional Fund Advisors	U.S.	30,396,002	1.1	109
6	APG Group	Netherlands	15,096,283	0.6	36
7	GMO	U.S.	11,678,100	0.4	36
8	Caisse de dépôt et placement du Québec	Canada	10,715,507	0.4	32
9	Crédit Agricole	France	10,370,572	0.4	37
10	Causeway Capital Holdings	U.S.	8,761,200	0.3	26
11	BrightSphere Investment Group	UK	8,232,564	0.3	29
12	Prudential (UK)	UK	7,547,339	0.3	23
13	McKinley Capital Management	U.S.	5,968,700	0.2	21
14	Charles Schwab	U.S.	4,649,463	0.2	19
15	T. Rowe Price	U.S.	4,414,900	0.2	13
16	Fidelity International	Bermuda	3,336,174	0.1	12
17	Florida State Board of Administration	U.S.	2,966,475	0.1	8
18	Deutsche Bank	Germany	2,888,972	0.1	10
19	Research Affiliates	U.S.	2,701,900	0.1	8
20	State Street	U.S.	2,507,330	0.1	9
	Other		1,830,287,551	67.1	5,522
	TOTAL:		2,328,483,688	85.3	7,270

Source: Thomson EIKON (2019, March), Shareholders: JBS, viewed in April 2019.

1.2 Louis Dreyfus Company

This research identified unmatured credit provided to LDC's Brazilian subsidiary Louis Dreyfus Co Brasil as well as at parent level. Table 4 provides an overview of the largest European and North American providers of unmatured credit to these companies.

Table 4 LDC European and North American creditors (2013-2018, US\$ mln)				
INVESTOR	COUNTRY	LOANS	UNDERWRITING	TOTAL
HSBC	UK	67	353	420
BNP Paribas	France	112	278	390
Credit Suisse	Switzerland	67	278	345
Crédit Agricole	France	184	108	292
ABN Amro	Netherlands	147	75	222
BPCE Group	France	112	75	187
Citigroup	U.S.	184		184
Rabobank	Netherlands	184		184
Société Générale	France	179		179
Citi	U.S.		170	170
BMO Financial Group	Canada	153		153
Regions Financial	U.S.	145		145
JPMorgan Chase	U.S.	67	75	142
DZ Bank	Germany	128		128
Crédit Mutuel CIC Group	France	122		122
US Bancorp	U.S.	117		117
SunTrust	U.S.	115		115
Bank of America	U.S.	112		112
Commerzbank	Germany	112		112
ING Group	Netherlands	112		112
Standard Chartered	UK	112		112
CIBC	Canada	105		105
Deutsche Bank	Germany	103		103
Erste Group	Austria	67		67
KBC Group	Belgium	67		67
KfW	Germany	67		67
UBS	Switzerland	67		67
UniCredit	Italy	67		67
Zürcher Kantonalbank	Switzerland	67		67
Habib Bank	Switzerland	47		47
Lloyds Banking Group	UK	46		46
Royal Bank of Canada	Canada	45		45
Barclays	UK	44		44
First Horizon	U.S.	44		44
Banque Cantonale de Genève	Switzerland	26		26
AKFED	Switzerland	20		20
TOTAL		3,415	1,412	4,827

Source: Thomson EIKON (2019, April), *Louis Dreyfus Company: Loans*, viewed in April 2019; Thomson EIKON (2019, April), *Louis Dreyfus Company: Bond issuances*, viewed in April 2019.

1.3 Minerva

One unmatured credit provided by the IFC to Minerva could be identified. In addition, this research identified five European and North American financial institutions as underwriters of bond issuances by Minerva in the period from 2013 to 2018 (Table 5).

Table 5 Minerva European and North American creditors (2013-2018, US\$ mln)				
INVESTOR	COUNTRY	LOAN	UNDERWRITING	TOTAL
HSBC	UK		782	782
Bank of America	U.S.		498	498
Credit Suisse	Switzerland		283	283
JPMorgan Chase	U.S.		200	200
Chase				
IFC	Global	138		138
Santander	Spain		40	40
TOTAL		138	1,803	1,941

Source: Thomson EIKON (2019, April), *Minerva: Bond issuances*, viewed in April 2019; Bloomberg (2019, April), *Minerva: Aggregated debt*, viewed in April 2019; JBS (2018, October 18). *JBS Announces US\$500 Million in Senior Notes and Liability Management Exercise*.

Table 6 provides an overview of the top 20 European and North American institutional investors which hold shares in Minerva.

Table 6 Top 20 European and North American institutional shareholders of Minerva (31 March 2019)					
RANK	INVESTOR	COUNTRY	NO. SHARES	% OF SHARES	VALUE (US\$ MLN)
1	BNP Paribas	France	12,907,194	3.4	16.6
2	Credit Suisse	Switzerland	5,370,300	1.4	7.7
3	Vanguard	U.S.	3,192,530	0.9	5.4
4	Invesco	U.S.	2,818,800	0.8	4.8
5	TT International	UK	1,992,643	0.5	2.6
6	Dimensional Fund Advisors	U.S.	837,786	0.2	1.4
7	BlackRock	U.S.	835,016	0.2	1.4
8	Sydbank	Denmark	593,777	0.2	1.0
9	Morgan Stanley	U.S.	506,895	0.1	0.7
10	Van Eck Global	U.S.	320,750	0.1	0.5
11	Nordea	Sweden	223,000	0.1	0.3
12	ABN Amro	Netherlands	207,258	0.1	0.3
13	State Street	U.S.	206,075	0.1	0.6
14	Seligson & Co Fund Management	Finland	159,000	0.0	0.3
15	Santander	Spain	150,347	0.0	0.2
16	Principal Financial Group	U.S.	138,400	0.0	0.3
17	Crédit Agricole	France	133,500	0.0	0.2
18	Azimut	Italy	98,800	0.0	0.2
19	TIAA	U.S.	74,900	0.0	0.1
20	Goldman Sachs	U.S.	34,000	0.0	0.1
Other			257,056,479	68.2	464
TOTAL			287,857,450	76.4	508

Source: Thomson EIKON (2019, March), *Shareholders: Minerva*, viewed in April 2019.

1.4 Marfrig

No unmatured loans provided to Marfrig in Brazil or its international debt issuing vehicles involving European or North American financial institutions could be identified. For the period from 2013 to 2018, this research identified three European and North American financial institutions as underwriters of bond issuances by Marfrig (Table 7).

Table 7 Marfrig European and North American creditors (2013-2018, US\$ mln)

INVESTOR	COUNTRY	UNDERWRITING (US\$ MLN)
HSBC	UK	960
Santander	Spain	960
Morgan Stanley	U.S.	510
TOTAL		2,430

Source: Thomson EIKON (2019, April), *Marfrig: Bond issuances*, viewed in April 2019; Bloomberg (2019, April), *Marfrig: Aggregated debt*, viewed in April 2019.

Table 8 provides an overview of the top 20 European and North American institutional investors which hold shares in Marfrig.

Table 8 Top 20 European and North American institutional shareholders of Marfrig (31 March 2019)

RANK	INVESTOR	COUNTRY	NO. SHARES	% OF SHARES	VALUE (US\$ MLN)
1	Brandes Investment Partners	U.S.	62,205,312	10.0	102.4
2	Storebrand	Norway	14,604,590	2.4	21.4
3	Azimut	Italy	9,273,800	1.5	13.6
4	Vanguard	U.S.	7,457,181	1.2	10.9
5	BlackRock	U.S.	5,197,812	0.8	7.7
6	Dimensional Fund Advisors	U.S.	4,039,394	0.7	5.9
7	BNY Mellon	U.S.	2,973,331	0.5	4.4
8	Norwegian Government Pension Fund - Global	Norway	1,913,205	0.3	2.7
9	Santander	Spain	1,279,616	0.2	1.9
10	Research Affiliates	U.S.	1,080,300	0.2	1.5
11	BNP Paribas	France	592,027	0.1	0.9
12	Crédit Agricole	France	550,643	0.1	0.8
13	RAM Active Investments	Switzerland	433,155	0.1	0.9
14	Eaton Vance	U.S.	392,168	0.1	0.6
15	Van Eck Global	U.S.	323,250	0.1	0.5
16	Polunin Capital Partners	UK	302,260	0.1	0.7
17	AcomeA	Italy	265,000	0.0	0.4
18	State Street	U.S.	252,805	0.0	0.4
19	Northern Trust	U.S.	247,500	0.0	0.4
20	TIAA	U.S.	144,200	0.0	0.2
	Other		467,510,120	75.3	763
	TOTAL		581,037,669	93.5	940.5

Source: Thomson EIKON (2019, March), *Shareholders: Marfrig*, viewed in April 2019.

[i] BNDES (2019, March), *Listagem das operações automáticas contratadas. Período considerado: de 01/01/2011 até 31/01/2019.*

1.1 Bunge

Bunge is a large agro-commodity trader with activities worldwide. This research did not identify unmatured credit provided to its Brazilian subsidiary Bunge Alimentos. Table 1 provides an overview of the largest European and North American providers of unmatured credit at parent level.

Table 1 Bunge European and North American creditors (2013-2018, US\$ mln)

INVESTOR	COUNTRY	VALUE (US\$ MLN)
Farm Credit Services Commercial Finance Group	U.S.	865
ABN Amro	Netherlands	313
ING Group	Netherlands	253
JPMorgan Chase	U.S.	122
Deutsche Bank	Germany	120
BNP Paribas	France	92
Citigroup	U.S.	92
Morgan Stanley	U.S.	80
Banco Bilbao Vizcaya Argentaria (BBVA)	Spain	80
Société Générale	France	80
Bank of America	U.S.	80
SunTrust	U.S.	80
US Bancorp	U.S.	80
Commerzbank	Germany	75
PNC Financial Services	U.S.	65
BPCE Group	France	60
KBC Group	Belgium	60
Standard Chartered	UK	60
Credit Suisse	Switzerland	60
DZ Bank	Germany	60
Royal Bank of Scotland	UK	60
Fifth Third Bancorp	U.S.	40
Crédit Agricole	France	40
Lloyds Banking Group	UK	35
Rabobank	Netherlands	30
HSBC	UK	30
Toronto-Dominion Bank	Canada	30
Wells Fargo	U.S.	25
BMO Financial Group	Canada	15
TOTAL		3,084

Source: Thomson EIKON (2019, March), *Bunge: Loans*, viewed in March 2019; Bloomberg (2019, March), *Bunge: Loan search*, viewed in March 2019.

Table 2 provides an overview of the top 20 European and North American institutional investors which hold shares in Bunge. The top 15 is dominated by asset managers and a pension fund located in the United States.

Table 2 Top 20 European and North American institutional shareholders of Bunge (31 December 2018)					
RANK	INVESTOR	COUNTRY	NO. SHARES	% OF SHARES	VALUE (US\$ MLN)
1	Vanguard	U.S.	13,922,409	9.9	744
2	T. Rowe Price	U.S.	10,831,595	7.7	579
3	BlackRock	U.S.	8,990,722	6.4	480
4	Franklin Resources	U.S.	5,634,755	4.0	301
5	State Street	U.S.	4,634,585	3.3	248
6	Morgan Stanley	U.S.	3,844,895	2.7	205
7	Fidelity Investments	U.S.	2,972,014	2.1	159
8	Carlson Capital	U.S.	2,830,048	2.0	151
9	Citadel	U.S.	2,388,423	1.7	128
10	TIAA	U.S.	2,302,448	1.6	123
11	Point72 Asset Management	U.S.	2,202,878	1.6	118
12	Northern Trust	U.S.	2,160,978	1.5	115
13	Adage Capital Management	U.S.	1,938,918	1.4	104
14	Dimensional Fund Advisors	U.S.	1,874,391	1.3	100
15	Fairepointe Capital	U.S.	1,537,973	1.1	82
16	BNP Paribas	France	1,449,707	1.0	77
17	Barclays	UK	1,372,573	1.0	73
18	Goldman Sachs	U.S.	1,342,567	1.0	72
19	Invesco	U.S.	1,313,937	0.9	70
20	Norwegian Government Pension Fund - Global	Norway	1,306,648	0.9	70
Other			38,320,977	27	2,067
TOTAL			113,173,441	80.2	6,068

Source: Thomson EIKON (2019, March), *Shareholders: Bunge*, viewed in March 2019.

1.2 Cargill

Cargill is a large agro-commodity trader with activities worldwide. This research did not identify unmatured credit provided to its Brazilian subsidiary Cargill Agricola. Table 3 provides an overview of the largest European and North American providers of unmatured credit at parent level.

Table 3 Cargill European and North American creditors (2013-2018, US\$ mln)				
INVESTOR	COUNTRY	LOANS	UNDERWRITING	TOTAL
BNP Paribas	France	1,172	336	1,507
JPMorgan Chase	U.S.	1,172	317	1,489
Barclays	UK	1,172	169	1,341
Bank of America	U.S.	1,172	169	1,341
Citigroup	U.S.	584	169	753
Lloyds Banking Group	UK	158	500	658
Deutsche Bank	Germany	274	317	591
HSBC	UK	274	151	425
Goldman Sachs	U.S.	237	151	387
Bank of New York Mellon	U.S.	358		358
Toronto-Dominion Bank	Canada	358		358
Scotiabank	Canada	324		324
Santander	Spain	293		293
Credit Suisse	Switzerland	274		274
Rabobank	Netherlands	261		261
US Bancorp	U.S.	237		237
Société Générale	France	237		237
Royal Bank of Scotland	UK	214		214
Royal Bank of Canada	Canada	192		192
Farm Credit Services Commercial Finance Group	U.S.	192		192
Wells Fargo	U.S.	192		192
Intesa Sanpaolo	Italy	192		192
ING Group	Netherlands	158		158
Standard Chartered	UK	158		158
Commerzbank	Germany	158		158
Skandinaviska Enskilda Banken	Sweden	124		124
Crédit Agricole	France	124		124
PNC Financial Services	U.S.	89		89
ABN Amro	Netherlands	77		77
BPCE Group	France	69		69
Banco Bilbao Vizcaya Argentaria (BBVA)	Spain	58		58
KBC Group	Belgium	47		47
TOTAL		10,598	2,278	12,876

Source: Thomson EIKON (2019, March), *Cargill: Loans*, viewed in March 2019; Bloomberg (2019, March), *Cargill: Loan search*, viewed in March 2019; Thomson EIKON (2019, March), *Cargill: Bond issuances*, viewed in March 2019; Bloomberg (2019, March), *Cargill: Aggregated debt*, viewed in March 2019.

1 Crop and livestock companies

1.1 ADM

This research did not identify unmatured credit provided to ADM's Brazilian subsidiary ADM do Brasil. Table 1 provides an overview of the largest European and North American providers of unmatured credit at parent level.

Table 1 ADM European and North American creditors (2013-2018, US\$ mln)				
INVESTOR	COUNTRY	LOANS	UNDERWRITING	TOTAL
Barclays	UK	922	595	1,517
Bank of America	U.S.	922	345	1,267
Citigroup	U.S.	922	307	1,229
JPMorgan Chase	U.S.	922	307	1,229
BNP Paribas	France	385	747	1,131
Deutsche Bank	Germany	385	576	961
Regions Financial	U.S.	922		922
Wells Fargo	U.S.	735	96	831
HSBC	UK	385	396	781
Bank of New York Mellon	U.S.	735		735
ING Group	Netherlands	735		735
Rabobank	Netherlands	572	96	668
Scotiabank	Canada	572		572
UniCredit	Italy	572		572
DZ Bank	Germany	568		568
ABN Amro	Netherlands	516		516
Banco Bilbao Vizcaya Argentaria (BBVA)	Spain	385		385
Commerzbank	Germany	385		385
Farm Credit Services	U.S.	385		385
Commercial Finance Group	U.S.	385		385
Northern Trust	U.S.	385		385
Morgan Stanley	U.S.	218		218
Credit Suisse	Switzerland	166		166
Goldman Sachs	U.S.	166		166
Intesa Sanpaolo	Italy	166		166
TOTAL		13,025	3,465	16,490

Source: Thomson EIKON (2019, April), *Archer Daniels Midland: Loans*, viewed in April 2019; Thomson EIKON (2019, April), *Archer Daniels Midland: Bond issuances*, viewed in April 2019.

Table 2 provides an overview of the top 20 European and North American institutional investors which hold shares in ADM.

Table 2 Top 20 European and North American institutional shareholders of ADM (31 March 2019)					
RANK	INVESTOR	COUNTRY	NO. SHARES	% OF SHARES	VALUE (US\$ MLN)
1	State Farm	U.S.	56,294,742	10.1	2,306
2	Vanguard	U.S.	46,433,985	8.3	1,903
3	BlackRock	U.S.	44,464,273	7.9	1,822
4	State Street	U.S.	36,005,112	6.4	1,478
5	Macquarie Group	Australia	15,025,231	2.7	616
6	Northern Trust	U.S.	12,188,015	2.2	499
7	Sun Life Financial	Canada	9,726,832	1.7	399
8	Invesco	U.S.	8,764,185	1.6	360
9	Geode Capital Holdings	U.S.	8,128,709	1.5	333
10	T. Rowe Price	U.S.	7,935,274	1.4	325
11	Bank of New York Mellon	U.S.	6,869,033	1.2	281
12	Wellington Management	U.S.	6,595,531	1.2	270
13	Victory Capital	U.S.	6,383,950	1.1	262
14	Norwegian Government Pension Fund - Global	Norway	5,514,500	1.0	226
15	LSV Asset Management	U.S.	4,916,692	0.9	201
16	Allianz	Germany	4,757,308	0.9	195
17	Dimensional Fund Advisors	U.S.	4,425,972	0.8	181
18	Prudential Financial (US)	U.S.	4,318,827	0.8	178
19	Bank of America	U.S.	3,745,475	0.7	153
20	Goldman Sachs	U.S.	3,683,355	0.7	151
	<i>Other</i>		155,616,535	27.8	6,410
	Total		451,793,536	80.7	18,550

Source: Thomson EIKON (2019, March), *Shareholders: Archer Daniels Midland*, viewed in April 2019.

The full financial data cited in this report can be found at <https://amazonwatch.org/assets/files/2019-complicity-in-destruction-2.pdf>

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