



Methodology for the Evaluation of Brands' Performance in the Keep Forest Standing Scorecard

November 2025



RAINFOREST
ACTION NETWORK

Since 2020, our evaluation has been steered by five questions:

- 1 Have brands made the first step in adopting a cross commodity policy to cut deforestation and conversion of natural ecosystems and human rights abuses from their forest-risk commodity supply chains and investments?
- 2 Have brands publicly disclosed and taken action to address the impact of their business on forests and the rights of local and Indigenous communities?
- 3 Are brands preventing violence and ensuring that the rights of local and Indigenous communities are being fully respected?
- 4 Are brands changing their purchasing or investment practices if their supplier/s or joint venture partner/s are caught breaching their policy to protect forests and uphold human rights?
- 5 Can brands prove to their customers that their suppliers and joint venture partners are complying with their policy across their business?

The table below shows the methodology used to assess if a company was awarded a 'Yes', 'Partial' or 'No' score for each recommended action.

Keep Forest Standing Campaign Demand	Metrics for 'Yes'	Metrics for 'No'	Metrics for 'Partial'
NDPE Policy Adopt and implement a cross commodity No Deforestation/ Conversion/ Degradation, No Peatland and No Exploitation (NDPE) Policy.	Published policies require compliance with core elements of a NDPE policy — protect forests (HCS forests, HCV areas, primary forests, and Intact Forest Landscapes) and natural ecosystems/peatlands regardless of depth from deforestation, conversion and degradation; ¹ respect internationally recognized human rights, including Indigenous People's rights per UNDRIP, ILO 169, and ILO core conventions, and ensure FPIC; and prohibit use of fire.	No published policy that requires compliance with core elements of a NDPE policy.	N / A
NDPE Policy Scope NDPE policy covers all forest-risk commodity supply chains and investments (including joint ventures) at a corporate group level. This means that suppliers throughout the supply chain, or investees (including joint venture partners) are required to comply with NDPE requirements across the "totality of legal entities to which the company is affiliated in a relationship in which either party controls the actions or performance of the other." ²	NDPE policy covers all forest-risk commodity supply chains and investments (including joint ventures) at a corporate group level. A cross-commodity NDPE policy, or commodity specific NDPE policies for all forest-risk commodities sourced, are accepted.	No published NDPE policy, or NDPE policy neither » covers all forest-risk commodities within a company's supply chain, nor » applies to all suppliers and investments (including joint ventures) at a corporate group level (e.g., the NDPE policy only requires suppliers to comply in operations that are in the brands' physical supply chain, not across the entire landbank and operations of the suppliers' corporate group).	NDPE policy covers all forest-risk commodity supply chains and investments (including joint ventures) or applies to suppliers at a corporate group level, but not both.

<p>Mandate for NDPE Policy Adoption</p> <p>Make it mandatory for all suppliers and investees to adopt and implement NDPE policies for all relevant forest-risk commodity supply chains at a corporate group level.</p>	<p>Contractually mandated requirement for suppliers and investees to adopt and comply with corporate group NDPE policies, and require the same of third-party suppliers, for all relevant forest-risk commodity supply chains.</p> <p>This requirement includes adequate policies to ensure fulfillment of Indigenous Peoples' and customary communities' rights to give or withhold their Free, Prior and Informed Consent to new or existing development on their territories in accordance with international human rights norms and best practices outlined in the High Carbon Stock Approach.³</p>	<p>No requirement for direct and third party suppliers, or investees, to adopt and comply with corporate group NDPE policies.</p>	<p>Requirement for suppliers or investees to adopt and comply with NDPE policy is not a contractual requirement and/or only applies to one forest-risk commodity supply chain, or lacks requirements on corporate group level implementation, or adherence to best practices on human rights.</p>
<p>NDPE Implementation Plans</p> <p>Published NDPE Implementation Plan has ambitious target dates for achieving independent verification of NDPE policy compliance across all forest-risk commodity supply chains.</p>	<p>Published NDPE Implementation Plan with ambitious target date, and time-bound milestones, for achieving full independent verification of NDPE policy compliance by suppliers and investees for all forest-risk commodity supply chains at a corporate group level.</p> <p>Target dates align with commodity specific cut-off dates and compliance deadlines in regulations (e.g European Union Deforestation Regulation EUDR).</p>	<p>No published NDPE Implementation Plan specifying a date for when suppliers and investees must achieve independent verification of NDPE policy compliance.</p>	<p>Published NDPE implementation plan specifying a date for when suppliers and investees must achieve independent verification of NDPE policy compliance for at least one commodity but not all relevant commodities, or target date is not ambitious, or does not require credible independent verification of compliance (e.g relies on certification), or fails to include all NDPE core elements.</p>

<p>Supply Chain Transparency Public disclosure of direct and indirect suppliers in forest-risk commodity supply chains and full traceability to source/plantation⁴ for all raw materials sourced.</p>	<p>Full disclosure of suppliers in forest-risk commodity supply chains in accordance with the definitions of traceability in the European Union Deforestation Regulation (EUDR) and Accountability Framework Initiative (AFi).</p> <p>Annual lists of direct suppliers, processing facilities/mills, and raw material producers including names of corporate groups), and must be updated at least once every 12 months.</p> <p>End-to-end supply chain traceability system is in place with geo-location data for suppliers' plantation/ranch or smallholder farms and first mile visibility and traceability from the point of production to collection points.</p>	<ul style="list-style-type: none"> » No disclosure of supplier lists or use of lists more than 12 months old, and/or: » no traceability to the source for any forest risk commodities, and/or » reliance on inadequate traceability systems that do not meet EUDR/AFi definitions (e.g, methods that estimate the origin areas or use a negligible risk approach, or lack plot-level geo-location). 	<ul style="list-style-type: none"> » Traceability to source achieved and disclosed in at least one sector, or » disclosure of supplier lists, but not all, forest-risk commodity supply chains.
<p>Address Forest Footprint Disclose and address the footprint of global forest-risk commodity supply chains and investments impacting natural ecosystems, including forests and peatlands, biodiversity, and the rights of Indigenous Peoples and communities affected by logging and the expansion of industrial agriculture.</p>	<p>Disclosure of Forest Footprint⁵ for all relevant forest-risk commodity supply chains, and regions, and contributions to programs that address past impacts and halt expansion of forest-risk commodities into natural ecosystems and Indigenous territories.</p> <p>Programs take an inclusive, rights-based approach to legally protect forests (HCS forests, HCV areas, primary forests, and Intact Forest Landscapes) and natural ecosystems/ peatlands and advance recognition of Indigenous and customary rights in sourcing jurisdictions.</p>	<p>No disclosure of Forest Footprint.</p>	<p>Disclosure of Forest Footprint for one forest-risk commodity; one production region; or footprint lacks information on impacts on Indigenous People and customary rights holders.</p>

<p>Proof of Free, Prior and Informed Consent</p> <p>Require proof of full compliance with laws, best practice and international norms on fulfillment of Indigenous Peoples rights to Free, Prior and Informed Consent (FPIC) for all existing and new production areas under the management and control of the corporate group.</p>	<p>Undertakes independent verification of suppliers' or investees compliance with laws, best practice and international norms on fulfillment of FPIC rights for all existing and new production areas.</p> <p>Best practices and international human rights norms include Indigenous Peoples established FPIC protocols, the High Carbon Stock Approach (HCSA) Social Requirements and Implementation Guidance, and international human rights norms.⁶</p>	<p>No independent verification of suppliers' or investees fulfillment of FPIC rights in accordance with laws, best practice and international norms, or verification:</p> <ul style="list-style-type: none"> » relies solely on certification » is not undertaken by credible and independent verification bodies, lead by teams with human rights expertise using processes that involve rightsholders » Is based solely on suppliers' self-reported claims (e.g. NDPE Implementation Reporting Framework (IRF)) » is undertaken using an inadequate methodology » is limited to new developments. 	<p>Independent verification of FPIC fulfillment is being trialed, or is undertaken by human rights experts in at least one commodity supply chain, using a published methodology that requires on the ground verification that meaningfully involves affected Indigenous Peoples and communities. (Certification systems with conflicts of interests in their auditing/ compliance systems and weak complaint mechanisms do not qualify.)</p> <p>And/or a public commitment to implement a credible methodology for independent verification of FPIC fulfillment in suppliers' or investees' new and existing operations has been made.</p>
<p>Robust Monitoring and Due Diligence Systems</p> <p>Robust forest, natural ecosystem, and human rights monitoring and due diligence systems are in use across forest-risk supply chains.</p>	<p>Robust and transparent forests and natural ecosystem/peatland monitoring and response systems and effective human rights monitoring and due diligence systems for identifying and reporting on suppliers and investees non-compliance at corporate group level are in use.</p> <p>Effective human rights monitoring and due diligence systems are in accordance with best practices outlined by international human rights treaties and norms.⁷</p>	<p>No monitoring and due diligence systems have been established.</p>	<p>Monitoring, response and due diligence systems are used to identify deforestation, conversion and degradation of natural ecosystems and fires in forest-risk supply chains, and suppliers' or investees impact on biodiversity, but are not transparent.</p> <p>Or monitoring and due diligence systems are used to identify their suppliers' or investees impact on human rights, but are not effective, do not cover all human rights, or do not employ field-based Human Rights Impact Assessments.</p> <p>Or monitoring and due diligence systems do not cover all NDPE requirements (e.g omit peatland, degradation, or human rights) and/or are not implemented at a corporate group level and/or across all forest-risk commodity supply chains.</p>

<p>Holding Bad Actors to Account</p> <p>Effective and accountable grievance mechanisms and non-compliance protocols are in use for all forest-risk commodity supply chains.</p>	<p>Public grievance mechanisms are in place that align with the UNGP Principles for non-judicial grievance procedures⁸ and are complemented by a published non-compliance protocol with adequate thresholds for suspension or termination of suppliers or investees for non-compliance with both social and environmental requirements.</p> <p>There is a consistent demonstration of its use with non-compliance cases and grievances raised across all forest-risk commodity supply chains (direct or indirect suppliers or within a corporate group), adequate resources dedicated to investigating grievances, and transparent reporting on handling of grievances and non-compliant suppliers or investees subject to suspensions or termination.</p> <p>In response to grievances raised has:</p> <ul style="list-style-type: none"> » Stopped sourcing commodities from, or investing in, corporate groups that are complicit in deforestation, natural ecosystem conversion and degradation, peatland clearance and human rights abuses (when requested from affected rights holders) » Secured credible, time-bound commitments to ensure transparent implementation of corrective actions and remediation of negative impacts <p>Mechanism must include clear, publicly available timelines for acknowledging, investigating and resolving grievances, with regular progress updates provided to affected parties. Timeframes should be appropriate to the nature and complexity of the case, and designed to ensure that grievances are addressed without undue delay.</p> <p>The mechanism is accessible to all affected stakeholders, in relevant local languages, via multiple safe and culturally appropriate channels, with strong anti-retaliation protections. Information on how to use the mechanism is disseminated to affected communities and workers.</p>	<p>No published grievance mechanism or non-compliance protocol and limited, or no, transparent reporting on grievances and identified non-compliant suppliers or investees and those that are subject to suspensions or termination.</p> <p>Or no indicative timelines for acknowledging, investigating, and resolving grievances, or there is no evidence that timelines are followed in practice.</p>	<p>Grievance mechanism is in place, and there is transparent reporting on grievances and non-compliant suppliers or investees, but it is not fully aligned with UNGP Principles due to inconsistent, inadequate, or unreliable responses to grievances raised.</p> <p>Non-compliance protocol is published but is not comprehensive, has inadequate thresholds for suspension or termination, or is not consistently applied to non-compliance cases or grievances raised, or grievances outside of the direct supply chain are not accepted (i.e does not apply across corporate group).</p>
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<p>Zero tolerance for violence and intimidation</p> <p>Enact zero tolerance policies and procedures within supply chains and investments to prevent violence, criminalization, intimidation, and killing of human rights, land, and environmental defenders.</p>	<p>Human Rights Defender (HRD) protections are embedded in a standalone, non-tolerance policy aligned with Zero Tolerance Initiative⁹ minimum requirements.</p> <p>The policy's requirements apply at the corporate group level across all forest-risk commodity supply chains.</p>	<p>No published zero tolerance policy, or procedures to prevent violence, criminalization, and intimidation of HRDs, or Policy commitments lack explicit non-tolerance language.</p>	<p>HRD protections include non-tolerance language, but are:</p> <ul style="list-style-type: none"> » not aligned with minimum policy requirements defined by the Zero Tolerance Initiative, or » have not been produced with inputs from HRDs, or » not made within a standalone HRD policy, or » applied to only part of the supply chain or corporate group.
<p>Independent Verification of NDPE Compliance</p> <p>Independently verify and disclose progress on fulfillment of NDPE policies.</p>	<p>Published credible methodology detailing how independent verification of NDPE policy compliance will be undertaken, or must be undertaken by suppliers or investees, and demonstration of its application in all forest-risk commodity supply chains through annual reporting on progress towards 100% fulfillment of NDPE policy compliance at a corporate group level.</p>	<p>No published methodology on independent verification of NDPE compliance, or verification:</p> <ul style="list-style-type: none"> » relies solely on certification. » is not undertaken by credible and independent verification bodies (e.g. second parties) » is based solely on suppliers' self-reported claims (e.g. NDPE Implementation Reporting Framework (IRF)) » methodology is inadequate. 	<p>Credible methodologies for the independent verification of NDPE policy compliance have been published and are being implemented in at least one forest-risk commodity supply chain.</p> <p>Or credible methodologies for independent verification of NDPE policy compliance have been implemented across multiple forest-risk commodity supply chains, but do not include all NDPE elements.</p>
<p>Advocate for Enabling Laws</p> <p>Advocate for enabling laws and regulations in producer, processing, and consumer countries that address the underlying causes of deforestation, conversion and degradation of natural ecosystems and violations of human rights in forest-risk commodity supply chains.</p>	<p>Advocates for enabling laws and regulations in consumer and processing countries that prohibit the import of non-NDPE commodities and the establishment of competent and functionally independent enforcement agencies.</p> <p>And advocates for enabling laws and regulations in producer countries that advance alignment of government policies with NDPE standards, international human rights norms, and protects civic space for civic society.</p> <p>And no evidence of advocacy against enabling laws in any jurisdiction.</p>	<p>Advocates against or remains silent on the enactment of enabling laws and regulations in consumer and producer countries that advance NDPE practices in forest-risk supply chains</p>	<p>Advocates for enabling laws and regulations in select consumer and/or processing and/or producer countries that advance NDPE practices in forest-risk supply chains, but not in all jurisdictions in their supply chains (ie. public support is limited to the EU Regulation on Deforestation (EUDR)).</p>

What does No Deforestation, No Peatland, No Exploitation (NDPE) stand for in a cross- commodity policy?

No Deforestation or conversion or degradation of natural ecosystems or peatlands¹⁰

- requires the protection of forests and natural ecosystems including High Conservation Value areas (HCV areas)¹¹, High Carbon Stock forests (HCS forests)¹², primary forests¹³ and Intact Forest Landscapes¹⁴ from deforestation, conversion, and degradation¹⁵ as per commodity sector specific cut-off dates, or pre-existing commitments with a cut-off date that was earlier than the sector specific cut-off dates. Remediation of environmental harm is required for all violations after the cut-off dates.

No Exploitation – which requires:

- » Respect for internationally recognized human rights^{16*}, throughout operations, supply chains and investments.
- » Operations only take place on Indigenous territories if it is legally permitted to do so and if affected Indigenous Peoples and customary rights holders give their Free, Prior and Informed Consent to activities on their lands.¹⁷
- » Zero tolerance for intimidation, violence, criminalization of affected community members/ rights holders, Human Rights Defenders, and land and environment defenders.¹⁸
- » Prohibit forced, compulsory or child labor; follow ethical recruitment practices; respect freedom of association; and recognize and respect the rights of all workers, including temporary, migrant and contract workers.¹⁹
- » Establishment and demonstration of use of an effective grievance mechanism aligned with the UN Guiding Principles on Business and Human Rights to resolve grievances.
- » Remediation of social harm to Indigenous Peoples, Quilombolas and other traditional communities, customary rights holders, local communities, and workers.

NDPE Policy Scope

The NDPE policies adopted must apply to all forest-risk commodities being sourced by the brand in its global operations, including raw materials sourced in ready-made products used in its manufacturing of consumer goods products. Forest-risk commodities include palm oil (crude palm oil, palm kernel oil (PKO), and derivatives including those embedded via animal feed and PKO derivatives including palm kernel expeller), wood pulp used in consumer products, paper and packaging, soy (including embedded soy in via animal feed), beef (including beef tallow), cocoa, coffee, and other forestry and agricultural products linked to deforestation and degradation of forests and natural ecosystems.

The scope of the policy adopted by brands should be comprehensive and apply to all suppliers or investees involved in the production, processing, trade and procurement of forest-risk commodities across all their operations at a corporate group level. Corporate group is defined by the Accountability Framework initiative.²⁰ Brands must undertake assessments of the extent of the corporate groups they are sourcing from, or investing in, using best practice methods for implementing the AFi definition such as the methodology outlined in the 'Shining light on the shadows' report which can be used to discover the structure of corporate groups and where there is common control between a company engaging in NDPE policy violations and the parent company, or ultimate beneficial owners, of a corporate group.²¹

Commodity sector specific cut-off dates

No Deforestation or conversion or degradation of natural ecosystems or peatlands requirements must be enforced through as per the following commodity sector specific cut-off dates.

- » July 22, 2008 – For Amazon Biome, the cut-off date for the conversion of any native vegetation for soy, in accordance with the Soy Moratorium.
- » October 5, 2009 – For Brazil, the cut-off date for the conversion of any native vegetation for beef, in accordance with the Cattle Agreement.
- » December 1994 – Deforestation cut-off date for wood pulp used in the manufacturing of tissues, paper and packaging products and consumer products (including those manufactured using viscose based products).
- » December 2015 – Deforestation cut-off date for palm oil and all palm oil derived products (crude palm oil, palm kernel oil, and derivatives including those embedded via animal feed). Where earlier cut-off dates apply in production, trader or procurement policies they must be upheld (e.g. April 2015 date of High Carbon Stock Approach Toolkit).
- » 2016 – For the Cerrado, the cut-off date for the conversion of any native vegetation in accordance with the Roundtable on Responsible Soy.
- » January 1, 2020 – Deforestation and conversion cut-off date for all other forest-risk commodities as per the Accountability Framework initiative guidance and the relevant global goals (Consumer Goods Forum 2020 No Deforestation commitment and New York Forest Declaration). Pre-existing commitments with specific cut-off dates should be followed (as above or in legislation or industry agreed cut-off dates). Pre-existing commitments without a specified cut-off date should specify the cut-off date as being the date of policy/commitment issuance or earlier.

Mandate for NDPE Policy Adoption

NDPE policies must set contractual, mandatory requirements for all suppliers, and investees, associated with forest-risk commodities to adopt and implement NDPE policies. Brands must set contractual requirements with direct suppliers (Tier 1 suppliers with contracts), and requirements for NDPE policy adoption and implementation that cascade throughout the supply chain to indirect suppliers with processing facilities and to raw material producers. This requirement includes adequate policies to ensure fulfillment of Indigenous Peoples' and customary communities' rights to give or withhold their Free, Prior and Informed Consent to new or existing development on their territories, in accordance with international human rights norms and best practices outlined in the High Carbon Stock Approach (As per RAN's "[The Need for FPIC](#)" Report). NDPE policies must prohibit development on the lands of Indigenous Peoples, Quilombolas and other traditional communities or respect local legislation if those provide strong protections from development on their territories. Suppliers throughout the supply chain, or investees including joint venture partners, must comply with NDPE requirements across all their operations that are involved in production, procurement, and trade of forest-risk commodities, at a corporate group level.²²

RAN's scorecard includes this action as a standalone recommendation that each brands performance is evaluated against given the importance of NDPE production requirements becoming the norm across forest-risk commodity supply chains, not just in policies applied to the palm oil sector--the sector where the NDPE standard was set during 2013- 2020--and to ensure NDPE policy adoption and implementation is being cascaded from direct (Tier 1) suppliers throughout supply chains to companies with processing facilities (especially third party refineries, mills, and plantations/ranches controlled by other corporate groups, independent mills, independent plantations and raw material producers, dealers/brokers, village co-operatives and smallholders).

NDPE Implementation Plans

The NDPE policy and associated implementation plans must have ambitious target dates, and time-bound milestones, for achieving implementation and independent verification of full compliance with the requirements detailed in the NDPE Policy for all forest-risk commodities at a corporate group level.

Target dates for brands should include, but not be limited to, dates to achieve independent verification of suppliers and investees compliance with NDPE requirements and cut-off dates for deforestation and conversion and degradation of other natural ecosystems (see section above on cut-off dates).

Target dates must also align with compliance deadlines outlined in laws or regulations, such as the enforcement date for the European Union Deforestation Regulation (EUDR).

Additional dates that may be set out in implementation plans but were not used as a basis for this evaluation, include deadlines by which suppliers and investees publish or enable the provision of information to inform transparent and collaborative monitoring systems that are accessible to the public and can inform monitoring of policy implementation and credible and independent verification. This includes data on all raw material source areas and land banks, traceability data, conservation areas, and affected Indigenous Peoples and local communities under the influence of the corporate group and suppliers in its global supply chains and investments. A NDPE policy and implementation plan should also describe the commitments to transparent and public reporting on all areas relevant for the policy implementation.

Supply Chain Traceability, Transparency and Other Disclosure Requirements for NDPE Policy Implementation

Public disclosure of suppliers in forest-risk commodity supply chains, and annual reporting on progress made towards full traceability for all raw materials sourced, is critical to achieving supply chains free of deforestation, degradation and conversion of natural ecosystems and human rights violations. Disclosure of suppliers in forest-risk commodity supply chains must include the publication of annual lists of direct and indirect suppliers, including the names and locations of processing facilities throughout the supply chain and raw material producers. It is not acceptable to publish outdated supplier lists or to only publish lists of Tier 1 suppliers.

Annual reports must detail progress towards achieving traceability to the source. Traceability definitions and systems must be designed to achieve and independently verify first mile traceability and to collate geo-location data for suppliers' plantation/ranch or smallholder farms in accordance with laws and regulations in consumer countries (such as the European Union Deforestation Regulation (EUDR)). Methodologies for independently verifying traceability, including first mile traceability and self-reported data provided by suppliers, must be disclosed. If first mile traceability has not yet been achieved, targets should be set for achieving full supply chain disclosure for all forest-risk commodity supply chains, including direct suppliers, processors/mills, and raw material producers, and target date/s for achieving traceability to the source (i.e. plantation, farm, ranch).

Transparency is also required for other demands outlined above in the Keep Forest Standing scorecard, such as the transparent disclosure of:

- » A cross-commodity NDPE policy, or NDPE aligned policies for each forest-risk commodity sourced in global supply chains.
- » Dedicated zero tolerance policy and procedures to prevent violence, criminalization, and intimidation of Human Rights Defenders (HRDs).
- » Evidence of contractual requirements for suppliers to adopt and implement NDPE policies and to cascade that requirement through supply chains.
- » Ambitious target dates, and a plan, for achieving independent verification of NDPE policy in all relevant forest-risk commodity supply chains.
- » Publication and provision of information to robust and transparent forest monitoring and response systems that are accessible to the public and can inform monitoring of NDPE policy implementation and credible independent verification. This includes data on all raw material source areas and landbanks (i.e concession boundaries), location of processing facilities, first mile traceability data, HVC areas, HCS forests (including data from HCV-HCS Assessments, indicative HCS forest maps, and data from field validation in sourcing regions), conservation areas, forest loss data (current and historical assessments after cut-off dates), fires and affected Indigenous Peoples and local communities (as agreed with rights holders).
- » The results of Forest Footprint evaluations and strategies and jurisdictional or landscape programs that have been designed to address the impacts identified during the assessment. If adaptations have been made to RAN's Forest Footprint methodology, the methodologies used must be disclosed.
- » Annual reporting on jurisdictional and landscape programs, including the scope of a brand's involvement and investment in each program, governance structures and details on the involvement of Indigenous Peoples and customary rights holders in multi-stakeholder platforms, aims of the program including means of monitoring, reporting and verification of outcomes and impacts. Reporting should be undertaken in accordance with best practice reporting guidance developed with inputs from civil society organizations.

- » Results of human rights due diligence systems and field-based Human Rights Impact Assessments.
- » Public grievance mechanisms, with reporting aligned with requirements of UNGP.²³
- » Non-compliance protocols with adequate thresholds for suspension or termination of suppliers or investees for non-compliance with both social and environmental requirements.
- » Methodologies used to undertake independent verification of performance against requirements in NDPE policy, including credible methodologies for:
 - » Desk-top and field-based independent verification of fulfillment of rights to Free, Prior and Informed Consent that are undertaken by human rights experts and involve affected Indigenous Peoples, customary rights holders and local communities.
 - » Independently verifying the effectiveness of forest monitoring and response systems and accuracy of deforestation- free claims and compliance with no conversion and degradation of natural ecosystems/peatland and no burning requirements.
 - » Independently verifying traceability, including first mill traceability and verification of self-reported data provided by suppliers.
- » Results of independent verification undertaken to determine NDPE compliance in supply chains, and investments, and implementation against clear time-bound targets, actions and tangible outcomes outlined in the cross commodity NDPE policy.

What is a “forest footprint”?

Rainforest Action Network is calling on Brands to know, publicly disclose and address the footprint of their global commodity supply chains and investments (including joint ventures) impacting forests, natural ecosystems/peatlands and the rights of Indigenous Peoples, customary rights holders, and local communities affected by logging and the expansion of industrial agriculture.

A Forest Footprint refers to the total area of forests and peatlands that have been, or could be, impacted by a brand’s consumption of forest-risk commodities. A brand footprint includes their contribution to the destruction of forests and peatlands by their suppliers or investments over the period of their business relationship, in addition to the areas that remain at risk within all suppliers’ landbanks, and their global forest-risk commodity supply chains and sourcing regions. It also includes their impact on Indigenous Peoples, customary rightsholders and local communities’ rights when forest and peatland areas are on traditionally managed lands. Areas at risk include forests and peatlands located within plantation development areas under a supplier or investees control; areas under the control of third-party suppliers; and areas allocated for future logging or agricultural development within the sourcing region surrounding mills, refineries, or processing facilities in their global supply chains. All of which must be known and publicly disclosed. RAN’s methodology that may be used by brands to undertake a Forest Footprint analysis.²⁴ This methodology may be adapted for use in specific commodity supply chain. Adapted methodologies must be disclosed with the results of analysis undertaken.

Examples of Forest Footprint publications:

- » Rainforest Action Network. Keep Borneo's Forests Standing: Evaluating the Forest Footprint of Brands Driving Deforestation and Land Rights Violations in the Indonesian Provinces of North and East Kalimantan, Borneo.²⁵
- » Nestlé. Palm Oil Forest Footprint. Aceh Province Analysis.²⁶
- » Unilever. Forest Footprint Report. Aceh, Indonesia Case Study.²⁷
- » Colgate-Palmolive. Palm Oil Forest Footprint. North Sumatra, Indonesia.²⁸
- » Kao, Palm Oil Forest Footprint: Riau Province: Rokan Hilir, Bengkalis, Dumai²⁹

Endnotes

- 1 As defined in the Convention on Biological Diversity.
- 2 Corporate group as defined by the Accountability Framework initiative.
- 3 As defined by Internationally recognized human rights norms per UNDRIP, UNDHR, ILO Fundamental Conventions, ILO 169 on Indigenous and Tribal Peoples, FAO VGGT, UN Guiding Principles on Business and Human Rights, UN Declaration on the Rights of Peasants. As per RAN's "The Need for FPIC" Report.
- 4 Traceability to Plantation (TTP) refers to the ability to trace and monitor volumes from downstream in the supply chain to the respective source for the raw material at the producer level.
- 5 As per RAN's Forest Footprint methodology, or an aligned method adapted for use in specific commodity supply chain.
- 6 As defined by Internationally recognized human rights norms per UNDRIP, UNDHR, ILO Fundamental Conventions, ILO 169 on Indigenous and Tribal Peoples, FAO VGGT, UN Guiding Principles on Business and Human Rights, UN Declaration on the Rights of Peasants.
- 7 Such as the UN Guiding Principles on Business and Human Rights, cover all human rights, and employ field-based Human Rights Impact Assessments.
- 8 UN Guiding Principles on Business and Human Rights.
- 9 Zero Tolerance Initiative minimum requirements for a HRD policy can be found at <https://www.zerotoleranceinitiative.org/committing-to-protections-for-human-rights-defenders> and additional resources at <https://www.zerotoleranceinitiative.org/zero-tolerance-policies>
- 10 All terms defined by the Accountability Framework initiative.
- 11 As defined by The HCV Network.
- 12 As defined by The High Carbon Stock Approach.
- 13 As defined by the Convention on Biological Diversity.
- 14 As defined by The IFL Mapping Team.
- 15 As defined by the Accountability Framework Initiative.
- 16 As defined by Internationally recognized human rights norms per UNDRIP, UNDHR, ILO Fundamental Conventions, ILO 169 on Indigenous and Tribal Peoples, FAO VGGT, UN Guiding Principles on Business and Human Rights, UN Declaration on the Rights of Peasants.
- 17 The fulfillment of the rights of FPIC must be in accordance with UNDRIP, HCSA Social Requirements, and the Accountability Framework initiative Operational Guidance on Respecting the Rights of Indigenous Peoples and Local Communities.
- 18 As per the Zero Tolerance Initiative minimum requirements for a HRD policy, additional resources at <https://www.zerotoleranceinitiative.org/zero-tolerance-policies>, UN Declaration on Human Rights Defender, and The Guiding Principles on Business and Human Rights: guidance on ensuring respect for human rights defenders.
- 19 As defined by the ILO Fundamental Conventions.
- 20 <https://accountability-framework.org/the-framework/contents/definitions/>
- 21 Greenpeace, Rainforest Action Network, Forest Peoples Programme. Shining light on the shadows. Towards a uniform methodology for establishing common control.
- 22 As defined by the Accountability Framework initiative.
- 23 UN Guiding Principles on Business and Human Rights.
- 24 https://www.ran.org/wp-content/uploads/2021/06/RAN_ForestFootprintMethodologies_June-2021.pdf
- 25 A summary forest footprint report, and a full report of RAN's evaluation of the Forest Footprint of Brands Driving Deforestation and Land Rights Violations in the Indonesian Provinces of North and East Kalimantan, Borneo is available at <https://www.ran.org/publications/borneo-forest-footprint/>.
- 26 <https://www.nestle.com/sites/default/files/2020-12/palm-oil-forest-footprint-aceh-province-analysis-2020.pdf>
- 27 <https://www.unilever.com/files/92ui5egz/production/6967d544f6e440f5ab61102387b9ca13edb8993f.pdf>.
- 28 https://www.colgatepalmolive.com/content/dam/cp-sites/corporate/corporate/en_us/corp/locale-assets/pdf/colgate-north-sumatra-forest-footprint-disclosure-aug-2021.pdf.
- 29 <https://www.kao.com/content/dam/sites/kao/www-kao-com/jp/ja/corporate/sustainability/pdf/palm-oil-forest-footprint-riau.pdf>.

