Evaluating the Brands Driving Deforestation and Human Rights Violations





_	
3	Introduction

5	Trends	and	Devel	lopments

- 5 Rise of Regulations Like the EUDR a Game Changer for Forests?
- 6 Leading Brands are Beginning to Claim 100% Deforestation-free But are They Really?
- 6 Protecting Human Rights Defenders and Respecting Land Rights
- 7 Investments in Landscapes Leuser Ecosystem Developments as Scalable Model

9 Essential Elements of a Robust Forest-Risk Commodity Policy

- 9 Defining a Credible NDPE Policy
- 10 All Elements of NDPE
- 10 Importance of Cross Commodity Policies
- 12 Importance of a Corporate Group Approach
- 13 Setting Ambitious, Time-Bound Targets
- 14 Identifying Greenwash and Calling Out False Solutions

15 Evaluation of Brands

- 15 The Grades
- Snapshot of Brand Progress Over the Past Year

19 Recommendations

21 Endnotes





PHOTO: Paul Hilton / Global Conservation COVER: Khairul Abdi / RAN



This scorecard provides a snapshot assessment on progress by some of the world's largest brands to remove the destruction of forests and violations of human rights from their business operations. The reality is that, despite hard-won commitments from the major international brands to transform their supply chains, deforestation and violence against frontline land defenders are on the rise globally, and the brands are still profiting from forest destruction and rights abuses.\footnote{1} These disturbing trends demonstrate a continuing failure by these big brands to close the gap between their public rhetoric and the destructive impacts caused by embracing half measures that result in their suppliers essentially carrying on with business as usual. Business as usual practices are resulting in corporate expansion into the world's last intact forest landscapes and the territories of Indigenous Peoples that have been stewards of their forests and biodiversity for millenia.

It is not an exaggeration to say that the health of human societies and economies is inseparable from the health of the world's forests. We know with certainty that the deforestation crisis and the climate crisis are inextricably intertwined. Up to 20% of total global carbon emissions, more than the world's entire transportation sector combined, are the result of deforestation.² With roughly 90% of deforestation driven by agricultural expansion³ for 'forest-risk commodities,' there simply is no viable solution to the existential threat of climate chaos that does not include stemming the alarming loss and degradation of forests occurring around the world.

Rainforest Action Network's (RAN) Keep Forests Standing campaign calls on some of the most influential brands fueling the destruction of rainforests and the violation of human rights to take real action for forests and communities. These corporations are powerful economic influencers within a large sector that relies on forest-risk commodities — the raw materials driving forest destruction around the world. Using only one commodity as an example — the only commodity which all these brands fully report on — together the brands purchased approximately 2.3 million tons of palm oil and 1.4 million tons of palm kernel oil and their derivatives in 2022. This represents around 3% and 17% of the global palm oil and palm kernel markets respectively.

The multinational brands driving deforestation and human rights violations through their supply chains are: Colgate-Palmolive, Ferrero, Kao, Mars, Mondeléz, Nestlé, Nissin Foods, PepsiCo, Procter & Gamble, and Unilever.

Beginning in 2021, RAN annually evaluated and ranked these companies against the efforts each has made, or not made, to keep forests standing and respect human rights in their supply chains. In 2023, RAN added key criteria and reviewed any progress made to update these rankings to see which brands are the biggest leaders and laggards in the sector.

Years of relentless campaigning by local communities and NGOs and allied international NGOs has harnessed grassroots and consumer people power to successfully pressure big brands, and most major players in the palm oil industry, to adopt the new benchmark standard for responsible commodity production — a No Deforestation, No Peatlands, No Exploitation (NDPE) policy. Some progress has been made in de-linking palm oil expansion from deforestation, but NDPE policies have not yet been implemented in full in the tropical forest regions where most palm oil is grown — Indonesia and Malaysia. It's not just palm oil that is driving deforestation — the fact remains that intact forests are still facing an onslaught due to corporate expansion of multiple forest-risk commodities that the brands source — palm oil, pulp and paper, soy, beef, cocoa, coffee and wood products. Little progress has been made to address the human rights impacts of commodity production and expansion.⁵

Many of the NDPE policies that have been adopted do not apply to all forest-risk commodities that a brand uses to manufacture its consumer goods products. This disconnect between paper promises and on the ground realities shows that there remain major loopholes in the policies that have been adopted by the brands and the way these policy commitments are being implemented by the brands and the corporations and smallholder farmers in their supply chains.

The Keep Forests Standing scorecard uses a comprehensive methodology and a detailed set of criteria to objectively assess the adequateness of the policies that have been adopted by the world's largest brands. It also evaluates the methods used to implement their policies and the level of transparency in their reporting on progress. The scorecard allocates a grade to each brand which allows consumers, financiers, and investors to understand how well each brand is doing in its efforts to end its role in driving deforestation and human rights violations compared to its peers. In this year's evaluation, we found that there is not a single brand that does not have a long way to go towards receiving an 'A' grade on these critically important issues. Procter & Gamble, Mondeléz, Ferrero and Nissin Foods are the worst performing among the 10 brands evaluated.

The brands included in this report are immensely influential economic actors with elaborate and logistically complex supply chains. The combined sales of the ten brands amount to approximately 460 million USD annually, which exceeds the GDPs of countries such as South Africa, Malaysia, Denmark. As a collective, they set the market signal for how forest-risk commodities are produced across the globe. Given that they profit from the use of cheap raw ingredients, it is in their interest to do their best to avoid accountability for the actions of their suppliers and create plausible deniability for the consequences of their purchasing decisions. Our job, as civil society and as a people-powered movement for climate justice, is to connect the dots between the forest frontlines and the products lining grocery store shelves. We can do that by following the money and holding the decision makers who are profiting from the destruction accountable.

With the real world impacts of the climate crisis rapidly escalating across the planet, the stakes are too high for any further half measures, false solutions or corporate doublespeak. The steps that need to be taken to close the loopholes and stop the destruction at its source are clear; what's needed now is the will of decision makers to make the investments in taking these solutions seriously. New government regulations taking shape in the EU, U.S. and other regions have at least the potential to have the teeth necessary to be the game changer we need to accelerate this process into fruition, but this will all depend on how vigorously and thoroughly they are enforced. False promises made by brands — and their business partners — will not be accepted. They must prove beyond a doubt that they have addressed their role in driving deforestation and human rights violations.



In this year's evaluation, we found that there is not a single brand that does not have a long way to go towards receiving an 'A' grade on these critically important issues. Procter & Gamble, Mondeléz, Ferrero and Nissin Foods are the worst performing among the 10 brands evaluated.

New canal development in carbon-rich peatlands in Indonesia's Leuser Ecosystem. October 2023. PHOTO: Paul Hilton / Global Conservation

TRENDS AND DEVELOPMENTS

In 2022, the world lost a forest area the size of Switzerland, 10 percent more than was lost in 2021.⁷ 2023 is on track to be the hottest year ever recorded.⁸ Scientists estimate the biodiversity crisis has put over a million species on the brink of imminent extinction.⁹ And over 1700 environmental activists are known to have been assassinated in the last decade.¹⁰ And yet, in the realm of consumer-facing brands linked to driving these crises, there are also some emerging developments that offer glimmers of hope for a new direction.

Rise of Regulations Like the EUDR - a Game Changer for Forests?

The passage and impending enforcement of the European Union Deforestation Regulation (EUDR) is a major development in the world of forest-risk commodities that will substantially impact all of the brands featured in this scorecard. In short, the EUDR requires all companies that import cattle, cocoa, soy, palm oil, coffee, rubber or wood products into the EU to trace the commodities used in the products that they are selling back to the plot of land where they were produced. Brands — and their suppliers — will need to provide the precise longitude and latitude in a due diligence statement. This statement must confirm that the product is not sourced from land that was deforested after December 31, 2020. Additionally, companies will need to disclose their deforestation due diligence systems annually. Companies caught sourcing products from deforested land are liable to be fined up to 4% of their annual revenue.

While the regulations are designed to allow corporations until roughly 2025 to achieve full compliance, the data presented in this report demonstrates that major global brands are not on track to meet these new requirements, exposing their investors and financiers to real material risk.

While the regulations are designed to allow corporations until roughly 2025 to achieve full compliance, the data presented in this report demonstrates that major global brands are not on track to meet these new requirements, exposing their investors and financiers to real material risk. This scorecard utilized two new indicators to measure brands against each other related to the new EUDR requirements. First, brands are assessed by if they are publicly supporting the EUDR and other emerging regulatory efforts. The second new criteria examines the level of traceability and transparency in a brands' supply chain and if they are disclosing their suppliers to the level they will need to to meet the EUDR. In short, despite improvements in the disclosure of suppliers by some brands, they all have a long way to go.¹²

Similar bills to the EUDR are advancing in other parts of the world, with one major bill already passed by the New York State Assembly¹³ and awaiting signature by the governor, and another moving forward in California.¹⁴

Leading Brands are Beginning to Claim They are 100% Deforestation-free - But are They Really?

Brands including Mars¹⁵, Nestlé¹⁶ and Ferrero¹⁷ are making the bold claim that they have ended deforestation in their supply chains — or are close to doing so — but there is no published evidence to support this and the claims are based on a limited scope, namely on ending deforestation in their physical supply chains. Given the long history of false claims and unfulfilled promises, how do we know these claims are credible? They may have taken short-cuts by shifting their sourcing away from the highest risk areas and simplified their supply chains instead of transforming the policies and practices of their suppliers across their operations and third party supply chains, which is the intervention needed to truly stop deforestation. To make matters worse, the claims are being "verified" by the same consultants that are paid to monitor a brands supply chains — meaning the verification methods are not independent and free of conflicts of interests. Without

question, there are big gaps between the nature of these claims currently and where they will need to be to satisfy the requirements of their own policies, consumer expectations and new regulations like the EUDR.

Unilever is the one brand that is requiring its suppliers to undergo an independent verification of their deforestation and conversion free claims. In 2022, it claimed that 74% of its palm suppliers, 95% of its paper and board suppliers, and 92% of its soy suppliers, were verified as deforestation free. It has not yet published the independent verification protocol or the methods it uses to undergo independent verification of its traceability or deforestation free claims. Other brands are reporting progress based on problematic reporting frameworks —like the NDPE Implementation Framework —that are based on self reported data from their suppliers or inadequate certification systems or action plans. 19

In the absence of credible, third party verification, there is a danger that false claims of reaching 100% Deforestation-Free supply chains allows brands to wash their hands of controversy without throwing their full weight behind the real, systemic solutions that have been clearly identified as necessary to address this complex crisis.

In the absence of credible, third party verification, there is a danger that false claims of reaching 100% Deforestation-Free supply chains allows brands to wash their hands of controversy without throwing their full weight behind the real, systemic solutions that have been clearly identified as necessary to address this complex crisis. There is a critical need for brands to expand their reporting to include third party, independently verified documentation of the fulfillment of human rights requirements in particular.

Protecting Human Rights Defenders and Respecting Land Rights

A big shift is that the number of brands with published policies, commitments or action plans on respecting human rights in their supply chains has grown from last year. The most significant breakthrough has been Unilever's publication of its detailed and dedicated policy and implementation plan for protections of Human Rights Defenders (HRDs).²⁰ It sets a globally-significant precedent on the role that corporations must take to declare and enact a zero tolerance approach to the violence, intimidation and criminalization of HRDs on the frontlines of expansions in the agribusiness sector. The policy applies across commodities — so it must now be implemented across Unilever's operations and those of its business partners and suppliers. There is a growing movement among forest-risk commodity purchasers to take a Zero Tolerance stance against the growing violence facing HRDs. Six of the ten brands now have public zero tolerance policies or commitments on HRDs, which is up from five last year.²¹ Nissin Foods, Colgate-Palmolive, Procter & Gamble and Mondeléz now stand out among their peers due to their lack of a clear commitment for protections for human rights defenders in their supply chains.

This past year has seen a suite of new and updated policies, action plans and disclosures on salient human rights Issues, including Nestlé's new Human Rights Policy and land rights action plan,²², Mars Guidance for Suppliers on Land Rights,²³ and Unilever's Responsible Partner Policy²⁴ that sets mandatory requirements on respecting land rights. There was also an increase in reporting on salient human rights issues in brands' supply chains, with Unilever,²⁵ PepsiCo²⁶ and Nestlé²⁷ publishing updates. Ferrero²⁸ and Mondeléz²⁹ have issued their first reports which had serious omissions because land rights violations were not recognized as a salient human rights issue. Mars' salient issues update³⁰ only recognized land rights as an emerging issue.

Nissin Foods, Colgate-Palmolive, Procter & Gamble and Mondeléz now stand out among their peers due to their lack of a clear commitment for protections for Human Rights Defenders in their supply chains.



While it is encouraging to finally begin to see some early models adopted, there remains little to no proof that land rights are being respected and Indigenous and traditional peoples rights to give or withhold their Free, Prior and Informed Consent (FPIC) is truly being applied to new and existing developments.

Published reports and cases on the violation of land rights in Indonesia continue to show the opposite — the rights of Indigenous communities like the Pargamanan-Bintang Maria community to say no to development on their lands are not being respected by some of the biggest corporate groups in the forestry sectors in Indonesia — such as the Royal Golden Eagle Group. This

case is the tip of the iceberg and is a consequence of brands turning a blind eye to decades of land grabbing and violation of land rights by their suppliers.

Investments in Landscapes - Leuser Ecosystem Developments as Scalable Model

Another hopeful trend is that many companies are increasing their investments in landscape initiatives, some involving thousands of smallholder farmers and the protection and restoration of forests. A report released recently by the Tropical Forest Alliance (TFA), CDP and Proforest identified a total of 37 landscape and jurisdictional approaches supported by companies and focused on palm oil production, surpassing any other commodity sector.³² However, less than a third of these programs aim to secure land tenure rights for Indigenous Peoples and local communities.

Unilever and PepsiCo are early leaders in developing jurisdictional approaches alongside governments in the provinces of Aceh and North Sumatra — home to Indonesia's globally important Leuser Ecosystem. In Aceh Tamiang, a key subdistrict of Aceh where the north-east lowland rainforests of the Leuser Ecosystem are located, deforestation has fallen to unprecedented low levels since a system of collaborative forest monitoring and field response was established in the area with support from both brands.³³

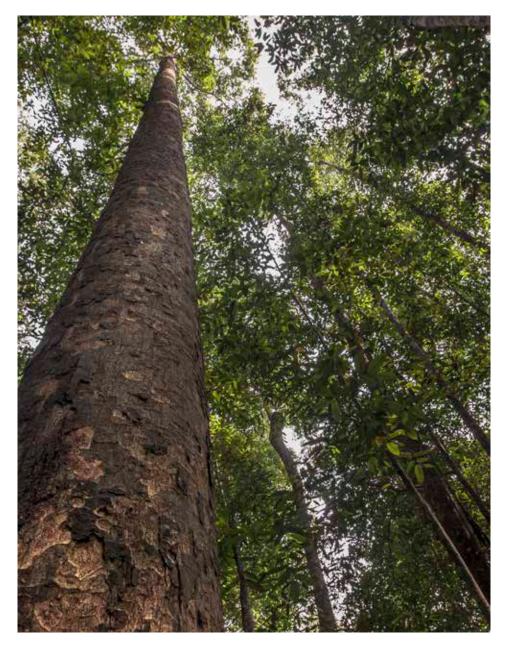
The success of the landscape coalition in Aceh Tamiang is now inspiring fresh partnerships in other forest-risk districts that have been the frontlines of deforestation for palm oil in the Leuser Ecosystem.³⁴ These programs hold promise as they enable NDPE practices to be implemented across entire jurisdictions — not just by

individual producers selling commodities into global supply chains. Given the central role of governments in the approaches, they also hold the key to improving forest governance systems and securing legal recognition of the rights for Indigenous communities to protect and manage their customary forests.

While these programs are encouraging, the scale of change isn't happening fast enough. We are seeing this in south-west Aceh in the Rawa Singkil Wildlife Reserve where deforestation and peatland destruction peaked in 2023 — the opposite to trends seen across Indonesia. A word of warning, jurisdictional approaches are not a silver bullet. Brands need to enforce their NDPE policies throughout their supply chains — and across the operations of their suppliers or business partners — in addition to scaling up investments in rights-based landscape programs.

Jurisdictional approaches are not a silver bullet. Brands need to enforce their NDPE policies throughout their supply chains — and across the operations of their suppliers or business partners — in addition to scaling up investments in rights-based landscape programs.

With the new requirements of the EUDR on importing businesses, there is increasing interest from big brands to see if landscape and jurisdictional initiatives can support transformation of traceability systems and address human rights and controversies stemming from conflicts between companies and communities.







DEFORESTATION & HUMAN RIGHTS ABUSES NOW! ESSENTIAL ELEMENTS OF A ROBUST FOREST-RISK COMMODITY POLICY

Over the past decade, dedicated community land struggles, escalating consumer pressure and coordinated international campaigning by international NGOs has achieved tremendous progress exposing the culpability of major global brands in driving deforestation and human rights abuses, as well as pressuring these brands to begin to accept some responsibility and issue public commitments to clean up their operations. Hundreds of large companies have adopted the new best practice policy standard that sets requirements for No Deforestation, No Peatlands, No Exploitation (NDPE) practices.³⁶ There are claims that deforestation rates in some key areas like Indonesia have started to decrease in part, as a result of the implementation of these voluntary policies.³⁷ Unfortunately, the reality is that these claims are contested and not all companies in the forest-risk sectors have NDPE policies.³⁸ Forests continue to fall at alarming and unsustainable levels, and community land conflicts and rights violations remain all too common especially on the forest frontlines where the expansion of logging and agribusiness operations in occuring.

Defining a Credible NDPE Policy

To bridge the gap between paper promises and real world transformation of forest-risk commodity supply chains we need to address critical flaws and loopholes in the existing voluntary policies that have been adopted by corporations throughout these supply chains. There are key necessities for a credible NDPE policy.

- » All elements of a NDPE policy need to be set as requirements that must be met by all suppliers as a precondition for sourcing and/or doing business.
- » Adopting a cross-commodity NDPE policy such that the NDPE requirements must be adhered to in all forest-risk commodity supply chains, not just palm oil.
- » Requiring adherence at a corporate group level so that NDPE requirements are not limited to the physical locations the brands source from.
- » Setting ambitious time-bound targets for achieving full implementation of the policy and the independent verification of compliance.

All Elements of NDPE

The adoption of a "No Deforestation" commitment or policy is not sufficient. The policy must include all elements of the standard for "No Deforestation, No Peatland and No Exploitation" practices. RAN's methodology defines the detailed elements of a NDPE policy but in short NDPE stands for a prohibition on deforestation, forest degradation and the conversion of natural ecosystems including peatlands and the violation of human rights as outlined in international human rights norms and treaties.³⁹ The policy must set credible cut-off date/s after which deforestation, forest degradation and the conversion of natural ecosystems will not be tolerated.⁴⁰

Importance of Cross Commodity Policies

Threats to forests and communities defending them are on the rise and come from multiple commodities that brands are using to manufacture their products; this is why brands need cross-commodity NDPE policies. An effective policy needs to prohibit deforestation, forest degradation and the conversion of natural ecosystems and the violation of human rights in all the supply chains that are linked to these harms.

For example, a simple chocolate bar is made using palm oil, cocoa, sugar, soy lecithin and milk/dairy products. Dairy products are made with milk that comes from cows that are fed animal feed that is often made with ingredients originating from soy and palm oil. Instant noodles are made with palm oil, and many contain beef. Pet food is made with animal products, including beef and chicken, that are fed food embedded with soy and palm oil. Toilet paper, diapers, and all products using paper based packaging rely on wood pulp, which in many cases still comes from virgin forests.

Many of the brands have policies in place that cover some, but not all, of the forest-risk commodities they source. Forest-risk commodities primarily include the main drivers of deforestation: palm oil (crude palm oil, palm kernel oil, and derivatives including those embedded via animal feed), wood pulp used in toilet paper, diapers and paper and packaging of consumer products, soy (including embedded soy via animal feed) and beef (including beef tallow and gelatine). They also include lesser contributors such as cocoa, coffee, tea, sugarcane and other forestry and agricultural products linked to deforestation and degradation of forests and natural ecosystems. Table 1 shows the gaps in each brand's policies both in relation to policies not including all elements of a NDPE policy and a failure to have a cross-commodity NDPE policy or individual NDPE policies in place for all forest-risk commodities.



Table 1: An assessment of the strength of each brands' NDPE policy coverage across the forest-risk commodities in its supply chains.

COMPANY	Forest-risk commodities exposure	Forest-risk commodities covered by cross commodity NDPE policy	Forest-risk commodities covered by individual commodity NDPE policies	Forest-risk commodities not, or insufficiently, covered by any NDPE policy
COLGATE-PALMOLIVE			Has a cross commodity NDPE policy	-
FERRERO		No cross commodity NDPE policy		
као			Has a cross commodity NDPE policy	-
MARS		No cross commodity NDPE policy		
Mondelēz		No cross commodity NDPE policy		
Nestle		No cross commodity NDPE policy		
NISSIN		No cross commodity NDPE policy		
PEPSICO		No cross commodity NDPE policy		
P&G		Has a cross commodity NDPE policy that is not fully aligned with NDPE		
Unilever			Has a cross commodity NDPE policy	

*Possible sourcing of beef products via Royal Brand in Argentina41



This RC County against tyle carlet a new magn-stall prill and the standard construction by a company called Pt Phoenix Rosources International in northeast Kalimanian.

Importance of a Corporate Group Approach

Our approach at RAN is to follow the money from points of destruction and exploitation and connect the dots to the powerful actors driving the destruction. Big brands will always try to hide behind the anonymity of complex webs of producers and traders in their supply chain. In the case of corporate conglomerates that dominate the production and trade of forest-risk commodities, powerful decision makers will cynically try to claim that one arm of their business is not responsible and cannot be held liable for the destructive practices of another arm. It is our role to expose these tactics of subterfuge and achieve real accountability from those with the power to stop the destruction.

The corporate tycoons behind so much of the vast destruction and plundering of tropical forests have long been experts at insulating themselves inside a web of shell corporations with complex and often ambiguous ownership and decision making structures. But when we look closely at who controls the entities within a corporate conglomerate, we can identify who is responsible, who is benefitting and who needs to be pressured because they have the power to stop the destruction.

Hundreds of the world's most influential corporations connected to forest risk commodities have now publicly adopted leading NDPE policy commitments. But the full impact of those commitments has yet to be realized at the ground level where it counts. This disconnect arises largely from the fact that the corporate conglomerates supplying big global brands with the ingredients to make their products are too often using shadow, or off the books, operations to look like they have reformed while still doing business as usual and successfully evading responsibility. Another reason is because NDPE policies are not being enforced across the entire operations of a corporate group that they do business with.

This challenge must be overcome; thankfully the Accountability Framework initiative (AFi) has published the leading definition for determining the extent of a 'corporate group' and the factors of control that exist, especially in the cases of the biggest forestry and agribusiness conglomerates.⁴² To date, only Unilever, Kao and Colgate-Palmolive explicitly refer to this definition in their NDPE policies.⁴³ The other brands must follow suit. A failure to do so will mean their reputations will continue to be at risk due to their associations with the most controversial corporate conglomerates driving deforestation and human rights abuses.

Another problematic loophole in the absence of a corporate group approach occurs because many suppliers to the major brands are producing commodities on lands that were cleared before the deforestation cut-off dates stated in their company policies, while at the same time that supplier or other companies within its corporate group controls vast landbanks that also include areas of standing forests that are being cleared but are not yet productive. In these cases, one company or supplier can be 'deforestation-free' in some areas of their landbank but not in others. If a brand's policy, or grievance procedure, only applies to its physical supply chains, it can keep doing business with a company that is in fact actively clearing forests in another area.

It is critical that consumers and forest and human rights advocates not be distracted by the smoke and mirrors of corporate attempts to avoid liability. The approach of demanding accountability at the corporate group level is critical to avoid leakage, whereby the impacts of forest destruction and rights abuses simply shifts from places with more visibility to places with less, or in situations where a corporate group just shifts to selling so-called deforestation-free products to markets like the U.S. and EU while continuing to sell tainted commodities produced on recently logged or cleared lands to markets with less environmental or social scrutiny, like China and India.

The reality is we are often talking about many of the same handful of powerful billionaire families that control conglomerates which have been evading taxes and environmental regulations for decades. In Indonesia, where vast areas of rainforests have, and continue to, be destroyed by corporate expansion for palm oil and timber and pulp and paper plantations, a handful of powerful families are the ultimate beneficiaries.⁴⁴ The Tanoto family is one example that controls the Royal Golden Eagle group.

A recent report called 'Pulping Borneo'⁴⁵ publishes the results of an investigation that "reveals that RGE's pulp mill in China has been using wood from companies that have recently cleared large tracts of tropical rainforest in Kalimantan, Indonesia's territory on the island of Borneo. Much of the rainforest, before it was destroyed, was habitat for endangered Bornean orangutans, according to data published by Indonesia's Ministry of Environment and Forestry."

Corporate conglomerates supplying big global brands with the ingredients to make their products are too often using shadow, or off the books, operations to look like they have reformed while still doing business as usual and successfully evading responsibility.

The report also exposes RGE Group's apparent control of a new mega-scale pulp mill that is under construction by a company called PT. Phoenix Resources International in northeast Kalimantan. Once operational, the pulp mill is expected to drive an increase in demand that will threaten some of the last remaining intact forest landscapes in Borneo and Papua. The RGE Group says it "categorically refutes the overall premise of the report."

Meanwhile, major brands like Procter and Gamble continue to buy palm oil from one arm of RGE, claiming that what one branch of the corporate group is doing is not relevant to the relationship they maintain with another branch, even though the same people are profiting from both branches.⁴⁷ Mondeléz is the only brand that has issued a statement claiming it does not source from Royal Golden Eagle group, but its latest published mill list lists RGE's palm oil companies as suppliers.⁴⁸ Other brands claim to have suspended sourcing palm oil from the RGE group but have failed to disclose this publically.

Setting Ambitious, Time-Bound Targets.

Public assurances to end deforestation, conversion of natural ecosystems and human rights violations are not worth the paper they are written on unless they include robust, time-bound targets to measure progress towards their implementation. In order to be credible, NDPE policies must set ambitious time-bound targets for achieving full implementation of the policy across each individual forest-risk commodity supply chain. They must also set target dates for the independent verification of compliance in their physical supply chain and across the operations of their suppliers at a corporate group level. Interim targets are also important including for achieving full traceability to the plantation, farm or forest level where forest-risk commodities are sourced. Nestlé has also set a new example by setting a target date for the disclosure of its global forest footprint.⁴⁹ This deadline is approaching at the end of 2023.

Most of the brands lack deadlines for ending deforestation, conversion of natural ecosystems <u>and</u> human rights violations in all forest-risk commodity supply chains. Some set unacceptable target dates like 2030 — a decade later than the unfulfilled commitment made by the Consumer Goods Forum to end deforestation by 2020 and the EUDR requirement to prove deforestation free sourced commodities by 2025 based on a 2020 cut-off date.⁵⁰ Others rely on insufficient action plans or certification systems to prove policy fulfillment.⁵¹ All the brands lack adequate target dates for beef — and most lack dates for soy — a result of their collective failure to force their suppliers to set and adhere to ambitious sector-wide deadlines including in the Brazilian Amazon and the Cerrado in Latin America.



Identifying Greenwash and Calling out False Solutions

There is an increasing number of Net-Zero Targets being set by the brands including Colgate-Palmolive, Kao, Mars, Mondeléz, Nestlé, Nissin Foods, PepsiCo, Procter & Gamble, and Unilever.⁵² "Net Zero" approaches can amount to a dangerous distraction that delays real progress and amounts to massive corporate greenwash.⁵³ There is a risk that these Net Zero claims, too often based on false solutions and fraudulent reporting on land use emissions from their supply chains, will be prioritized by the brands instead of the fulfillment of time-bound targets to truly end deforestation and degradation of forests and natural ecosystems in their supply chains.

There is a big difference between an approach designed towards truly ending gross deforestation versus Net Zero, which continues to allow deforestation or forest degradation to occur so long as it is "offset" by restoration or tree planting using Net based accounting systems.⁵⁴ This is just like the big difference between achieving Real Zero carbon emissions and Net Zero Emissions by 2030 or 2050.

As U.N. Secretary-General Antonia Guterres said earlier this year: "The truth is that more and more businesses are making Net Zero commitments, but benchmarks and criteria are often dubious or murky and this can mislead consumers, investors, and regulators with false narratives. It feeds the culture of climate misinformation and confusion and leaves the door open to greenwashing." 55

"Net Zero" approaches can amount to a dangerous distraction that delays real progress and amounts to massive corporate greenwash

EVALUATION OF BRANDS PHOTO: Paul Hilton / RAN

The 2023 Keep Forests Standing Scorecard evaluates the policies and actions taken by ten of the world's most influential brands to address their role in driving deforestation and human rights violations in forest-risk commodity supply chains. The methodology has been revised since RAN's 2022 evaluation in response to key emerging trends impacting the world's forests, advances in government regulation in global markets, and emerging approaches in the implementation of voluntary commitments in forest-risk commodity supply chains. This year's scorecard includes the addition of two new demands. One is on supply chain transparency — an evaluation of the level of disclosure of the suppliers in each brand's forest-risk commodity supply chains. The second evaluates any advocacy efforts that clearly demonstrate support for the new regulations that have been enacted to end deforestation-linked commodities in key consumer regions, such as Europe and USA.

Additionally, a level of nuance has been added to the grades by adopting a system of pluses and minuses to the letter system. A top score of A+ is now awarded for achieving 24 points as our evaluation now has a total of 12 elements that each brand's performance is measured against. Detailed evaluations of the policies of top banks and investor policies are available at <u>forestsandfinance.org</u>.

The Grades

With drastic impacts from climate chaos occurring all around us, including widespread human suffering and rapidly rising death tolls, not to mention dire ecological damage and extinction rates increasing every year, the stakes are simply too high and the situation too urgent for the powerful global brands included in this report to continue their snails pace progress towards fulfilling their commitments to end the deforestation and human rights abuses still occurring as consequences of their business operations. There is not a single brand that does not have a long way to go towards receiving an 'A' grade on these critically important issues. Receiving an "F" grade, the following represent the worst performing among the 10 companies evaluated: Procter & Gamble, Mondeléz, Ferrero and Nissin Foods.

Unfortunately, the relative groupings of the ten brands has remained largely static since last year, with Unilever in the clear lead, Nestlé, PepsiCo, Kao and Colgate-Palmolive in the middle of the pack but showing some signs of upward movement, and Mars in the middle of the pack but mostly stagnant in its progress. This leaves Ferrero, Mondeléz and Nissin Foods as laggards, with Procter & Gamble standing out at the very bottom as the worst actor falling even further behind among its peers. In fact, Procter & Gamble was the only company that issued a cross commodity policy that actually weakened its requirements for suppliers. Its new policy no longer has explicit protections for Intact Forest Landscapes or prohibitions on forest degradation for wood pulp used to make its paper products.⁵⁷

RAN ranks some of the most influential brands fueling the destruction of rainforests and the violation of human rights. This year's grades are:

		Transparency					
Criteria	NDPE Policy	NDPE Policy Scope	Mandate for NDPE Policy Adoption	NDPE Implementation Plans	Zero tolerance for violence and intimidation	Supply Chain Transparency	Forest Footprint Disclosure
Unilever	Υ	Υ	Υ	P***	Υ	N	Р
Nestle	Υ	P**	N	P***	Р	N	Р
PEPSICO	Υ	P**	Р	P***	Р	N	N
Kao	Y	Y	Р	N	Р	N	Р
COLGATE-PALMOLIVE	Υ	Υ	Р	N	N	N	Р
MARS	Υ	P**	N	P***	Р	N	N
FERRERO	Y	N	N	N	Р	N	N
NISSIN	Υ*	N	N	N	N	N	Р
Mondelez	Υ	N	Р	N	N	N	N
P&G	N	P**	N	N	N	N	N

Nissin Foods affirmed 'No Deforestation, No Peat, No Exploitation (NDPE)' in its group policy but strengthening is needed to explicitly require suppliers to comply with the core elements of NDPE commitments.⁵⁸

Mars,⁵⁹ Nestle,⁶⁰ PepsiCo⁶¹ and Procter & Gamble⁶² have been given a partial score due to their published cross-commodity commitments on some, but not all, elements of a NDPE policy.

Mars⁶³, Nestle⁶⁴, PepsiCo⁶⁵ and Unilever⁶⁶ have been given a partial score as they have published target dates for achieving the implementation of 'No Deforestation' commitments in multiple commodity supply chains. They have not issued target dates for achieving independently verified implementation of all elements of a NDPE policy.

	Мо	nitoring, Verificatio	n & Greivance Syste	Advocacy					
Criteria	Robust monitoring and due diligence systems	Holding Bad actors to Account	Proof of Free, Prior and Informed Consent	Independent verification of NDPE compliance	Advocate for enabling laws	SCORE	GRADE		
Unilever	Р	Р	Р	Р	Р	15	С		
Nestle	Р	Р	N	N	N	8	D		
PEPSICO	N	N	Р	Р	N	8	D		
Kao	Р	N	N	N	N	8	D		
COLGATE-PALMOLIVE	Р	N	N	N	N	7	D-		
MARS	Р	N	N	N	N	6	D-		
FERRERO	Р	N	N	N	Р	5	F		
NISSIN	Р	Р	N	N	N	5	F		
Mondelēz, International	Р	N	N	N	N	4	F		
P&G	Р	Р	N	N	N	3	F		

GRADE RANGE:

YES

NO

Υ	= 2	A+	= 24	B+	= 20	C+	= 16	D+	= 10,11	F	= 0-5
P	= 1	А	= 22,23	В	= 18,19	С	= 13-15	D	= 8,9		
N	= 0	A-	= 21	B-	= 17	C-	= 12	D-	= 6,7		

PARTIAL

The ten brands evaluated by the Keep Forest Standing Scorecard fall into three groupings, with the important note that the term 'leader' is quite relative as the top scoring brand is still earning only a 'C' grade. The three relative groupings are:

Leaders - meaning top in scores among its peers: Unilever

Middle of the pack - meaning roughly in between the best and worst scores: Nestlé, PepsiCo, Kao, Colgate-Palmolive and Mars Laggards - meaning absolute worst of the worst: Procter & Gamble, Ferrero, Mondeléz and Nissin Foods

Snapshot of Brand Progress Over the Past Year

- » **Unilever** continues to lead by example. In the last year it has built on the foundation it set in 2020 when it published the strongest cross-commodity NDPE policy of all the brands with the publication of a precedent setting Human Rights Defender policy and action plan.⁶⁷ In the past year it has continued to invest in landscape programs in the Leuser Ecosystem and publicly reports on its supply chain, major grievances, and suspended suppliers.⁶⁸ Unilever is fast approaching its target for its palm oil, paper and board, soy, tea and cocoa to come from places that are independently verified as deforestation and conversion-free by the end of 2023.
- » Nestlé claims 99.1 % deforestation-free supply chains for meat, palm oil, pulp and paper, soy and sugar in 2022 but has not published the results of third-party verification of its claims so they can be trusted by consumers.⁶⁹
- PepsiCo has issued a new commitment on Human Rights Defenders, for the first time disclosed the palm oil refineries it sources from, and is developing plans for new investments in landscape programs in Aceh and the Leuser Ecosystem.⁷⁰
- » **Kao** has made further revisions to its cross-commodity NDPE policy to clarify it applies to all forest-risk commodities at a corporate group level defined by AFi.⁷¹ Kao also disclosed details of the monitoring system it uses to identify forest risk areas and deforestation in its suppliers' operations.⁷²
- » Colgate-Palmolive made further improvements of its cross-commodity NDPE policy and explicit requirements for its suppliers to adhere to the policy across their operations using the best practices definition for corporate group.⁷³

Receiving an "F" grade, Procter & Gamble, Mondeléz, Ferrero and Nissin Foods are the worst performing brands among the 10 companies evaluated.

- » Mars has not improved its score and continues to claim 100% deforestation free palm oil supply chains despite its failure to commission third-party verification of its claims so they can be trusted by consumers.⁷⁴ Mars made one valuable contribution in the last year through the publication of guidance for its suppliers on respecting land rights.⁷⁵
- » **Ferrero** remains a laggard and continues to lack a cross-commodity NDPE policy, or even specific NDPE policies for high-risk commodities including paper and packaging, soy, dairy, coffee and sugarcane supply chains.
- » **Nissin Foods** remains a laggard but has made revisions to its group procurement policy to state it affirms NDPE practices, including on respecting FPIC rights. This policy revision is another missed opportunity as it has failed to set NDPE practices as a requirement for all suppliers. Nissin Foods has improved on the disclosure of its list of palm oil suppliers for its Japanese operations through the disclosure of its grievance list. The procurement for all suppliers for its Japanese operations through the disclosure of its grievance list. The procurement for all suppliers for its Japanese operations through the disclosure of its grievance list. The procurement for all suppliers for its Japanese operations through the disclosure of its grievance list. The procurement for all suppliers for its Japanese operations through the disclosure of its grievance list. The procurement for all suppliers for its Japanese operations through the disclosure of its grievance list. The procurement for all suppliers for its Japanese operations through the disclosure of its grievance list.
- » **Mondeléz** remains a laggard and has not improved its score. Mondeléz continues to lack a cross-commodity NDPE policy, or even have adequate commodity specific NDPE policies for its paper and packaging, soy, sugarcane, dairy and beef supply chains.
- » **Procter & Gamble** is the worst laggard overall and in the last year has actually moved backwards by publishing a cross-commodity policy with even weaker protections for forests in its wood pulp supply chain-which has a massive impact on the Boreal forests given its dominance in the toilet paper business.⁷⁸

RECOMMENDATIONS PHOTO: Nanang Sujana / RAN

The era of half measures and empty promises must end, and fast. We still need to reach a basic starting point of brands having truly adequate policies in place and action plans that detail how, and by when, they will be fully implemented and credibly verified in all forest-risk commodity supply chains. The policies adopted must require their suppliers and business partners to adhere to No Deforestation, No Peatland and No Exploitation (NDPE) practices across their entire operations, not just in the palm oil sector. Once this influential grouping of ten brands have leading cross commodity and corporate group wide NDPE policies in place, we can move the wider 400 companies in the Consumer Goods Forum, and the agribusiness sector at large, to follow suit.

Three of the ten brands, Unilever, Colgate-Palmolive and Kao, have recently issued cross-commodity NDPE policies that apply at a corporate group level as defined by Accountability Framework initiative (AFi).⁷⁹ Across the board, more focus is needed to ensure NDPE policies apply, and are enforced, across forest-risk commodity supply chains and at a corporate group level. These policies also must effectively prohibit expansion into High Conservation Value areas, such as Intact Forest Landscapes and primary forests, High Carbon Stock forests and secondary forests, and natural ecosystems, including peatlands.⁸⁰

Some brands made moderate progress on increased disclosure of grievances. Unilever, Procter & Gamble and Nissin Foods now have public grievance trackers, however Procter & Gamble's wood pulp tracker fails to disclose the names of suppliers. Unilever and Nestlé have public lists of suspended suppliers. Kao has a grievance list for smallholder producers, but not for plantation companies, mills or its direct suppliers. Despite this progress, across the board there remains a lack of reporting on grievances and no adequate disclosure of actions taken to suspend problematic corporate groups violating land rights in Indonesia, such as Royal Golden Eagle Group and other palm oil suppliers consistently linked to deforestation in the Leuser Ecosystem. This needs to change. We need transparent grievance lists and tracking of remedy of conflicts and restoration of areas destroyed after commodity specific cut-off dates. When something goes wrong, brands need to report on what they are doing to remedy the harms caused by their suppliers or business partners.

The precedents beginning to be made, by some brands, in some places, must be replicated at scale to be established as new industry-wide benchmarks for acceptable corporate behavior. This includes the need for all brands and agribusiness traders to follow suit with dedicated Human Rights Defender policies that

are as strong as the precedent setting policy and action plan published by Unilever. Brands and collectives such as the Forest Positive Coalition must disclose their Forest Footprints for global supply chains and scale up investments in rights-based landscape and jurisdictional programs. We need to see ambitious targets for achieving first-mile traceability in all commodity supply chains, transformation in traceability systems, and compliance with regulations. Radical transparency on policy advocacy efforts⁸⁴ and annual supply chain disclosure to the level of plantations and farms needs to become the new business as usual.

Forest monitoring systems are now in place for all brands-with the exception of PepsiCo. The brands need to make their monitoring systems transparent as well as report on how alerts have been responded to regularly and thoroughly where deforestation, forest degradation, and peatland development persists. Transparency is also needed to back up claims made on protecting and restoring forests as part of "Forest Positive" or jurisdictional approaches. A parallel focus must be made on establishing robust and transparent human rights monitoring and due diligence systems.

As a basic condition of trust, brands must provide credible proof to back up their no-deforestation claims. It is not enough for brands to just claim they have fixed their deforestation or human rights problems. Brands must demand and independently verify proof that their business partners respect land rights in existing and new operations. Where a community says they haven't consented to development, brands need to listen to them and ensure that the positions of Indigenous and local communities determine the fate of their lands. Credible, independently verification systems are needed — certification alone will not suffice.

Despite many promises and the worsening climate crisis, this year's evaluation found that none of the 10 major brands reviewed here have taken adequate action to address their contribution to driving deforestation and human rights violations in forest-risk commodity supply chains. Forests continue to fall, hundreds of communities suffer the impacts of having their traditional forests and lands seized and cleared, and workers continue to face abuse. The Keep Forests Standing campaign and consumers across the globe demand more than paper promises.

Given the climate and biodiversity crisis, all 10 brands must do more to address their contribution to driving deforestation and human rights violations in forest-risk commodity supply chains.

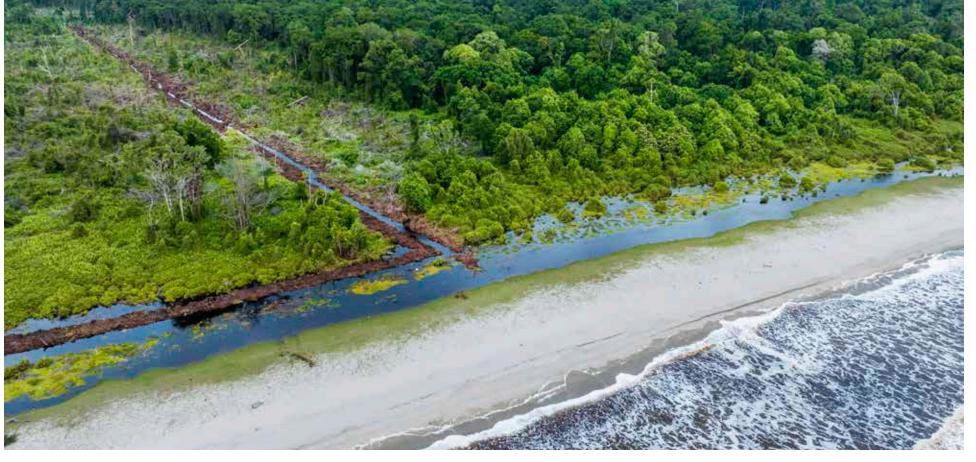


ENDNOTES

- Reuters. Tropical forest losses rise in 2022 despite pledge to end them. June 27, 2023.
- The London School of Economics and Political Science. "What is the role of deforestation in climate change and how can 'Reducing Emissions from Deforestation and Degradation' (REDD+) help?" February 2023.
- 3 Food and Agriculture Organization of the United Nations (FAO). "COP26: Agriculture expansion drives almost 90% of tropical deforestation." June 11, 2021.
- 4 Roundtable on Sustainable Palm Oil. Annual Communication of Progress (ACOP). Accessed September 22nd 2023. Procter & Gamble. Responsible Palm Oil Data. Accessed September 22nd 2023.
- 5 Rainforest Action Network. "The Need for Free, Prior and Informed Consent." Rainforest Action Network.
- 6 MarketScreener
- 7 World Resources Institute. "How much forest was lost in 2022?" Accessed September 28th, 2023.
- 8 Washington Post. "2023 is on track to be the hottest year on record." August 8th, 2023.
- 9 Reuters. "Extinction crisis puts 1 million species on the brink." December 22, 2022.
- 10 BBC News. "Over 1,700 environment activists killed in decade report." September 29, 2022.
- 11 European Commission. "Deforestation-free products." Accessed September 28th, 2023.
- Nestlé. Supply Chain Disclosure. Accessed September 28, 2023. Unilever. "Building inclusive, deforestation-free palm oil supply chains." May 22, 2023. Procter and Gamble. "P&G Tier 1 Palm Oil Supplier List." July 2023. Procter and Gamble. "P&G Tier 1 Palm Oil Supplier List." July 2023. Ferrero. "Cocoa tier-1 suppliers and farmer groups." August 31, 2022. Ferrero. "Palm Oil Suppliers and Mill Lists." December, 2022. PepsiCo. "PepsiCo Refineries List 2022." Accessed September 28, 2023. Nissin Foods. "Palm oil procurement." Accessed September 28, 2023. Kao. "Palm Oil Dashboard." Accessed September 28, 2023. Mars. "2021 Annual Report." Accessed September 28, 2023. Colgate-Palmolive. "No Deforestation Policy." Accessed September 28, 2023.
- 13 New Republic. "How New York Could Help Save Forests Around the World." August 2, 2023.
- 14 NWF Blog, "This Bill Could Breathe New Life Into Our Forests." February 25, 2022.
- 15 Mars. "Mars Palm Positive Plan Delivers Deforestation-Free Palm Oil Supply Chain." October 5, 2020. Mars. "Palm Positive Update." August, 2023.
- 16 Nestlé. "Deforestation-Free Supply Chains." Accessed September 29, 2023.
- 17 Ferrero. "Starling Monitoring 2021." Accessed September 28, 2023.
- 18 Unilever. "Forest Risk Commodities Reporting 2022." Accessed September 28,2023.
- PepsiCo. <u>"2022 PepsiCo Annual Public Reporting."</u> July, 2023. Colgate-Palmolive. <u>"Our Policy on Responsible and Sustainable Sourcing of Palm Oil."</u> Accessed September 28, 2023. Kao. <u>"Kao Sustainablity Report 2023."</u> Accessed September 28, 2023. Mondeléz. <u>"2022 ESG Report."</u> Accessed September 28, 2023. Nissin Foods. <u>"Sustainable Procurement."</u> Accessed September 29, 2023. Procter and Gamble. <u>"P&G's Forest Commodity Policy."</u> Accessed September 28, 2023. "<u>NDPE Implementation Reporting Framework.</u>" Accessed October 24, 2023.
- 20 Unilever. "Principles in Support of Human Rights Defenders." September, 2023.
- 21 Unilever. "Principles in Support of Human Rights Defenders." September, 2023. Kao. "High-Risk Supply Chain Management and Sourcing." Accessed September 28, 2023. Mars. "Mars Statement on Human Rights Defenders." Accessed September 28, 2023. Nestlé. "Indigenous Peoples' and Local Communities' Rights." Accessed September 28, 2023. PepsiCo. "PepsiCo Statement on Human Rights Defenders." May, 2022. Ferrero. "Ferrero's Human Rights Statement." Accessed September 28, 2023.
- 22 Nestlé. "Nestlé Human Rights Policy." July 2023.
 - Nestlé. "Indigenous Peoples and Local Communities' Rights." Accessed September 28, 2023. Nestlé "Nestlé's Salient Issue Action Plan." February 2023.
- 23 Mars. "Guidance for Suppliers on Land Rights." October, 2022."
- 24 Unilever. "Responsible Partner Policy." Accessed September 28, 2023.
- 25 Unilever. "Human Rights Report Interim Update 2022." Accessed September 28, 2023.
- 26 PepsiCo. "Salient Human Rights Issues Update." December, 2022.
- 27 Nestlé. "Nestlé's Human Rights Framework and Roadmap." December, 2021.
- 28 Ferrero. "Respecting and Promoting Human Rights." Accessed September 28, 2023.
- 29 Mondeléz. "Human Rights Due Diligence and Modern Slavery Report 2022." Accessed September 28, 2023.
- 30 Mars. "Refreshing Our Saliency and Human Rights Priorities." Accessed September 28, 2023.
- 31 Rainforest Action Network. "The Need for Free, Prior and Informed Consent." November 2020. Rainforest Action Network. "The Forest is Part of Us." November 2021. Rainforest Action Network. "Long Isun Fights for Borneo's Vanishing Rainforests." February 2023.
- 32 Jurisdictional Action Network. "Sharing Responsibility and Success." July, 2023.
- 33 Unilever. "Forest Risk Commodities Reporting 2022." Accessed September 28, 2023. Tropical Forest Alliance. "Jurisdictional Approach to Sustainability." July, 2021.
- 34 Jakarta Post. "East Aceh supports 'PPI Compact' as commitment to sustainable development." September 1, 2023.
- Rainforest Action Network. "RAN Reveals Fresh Evidence of Illegal Rainforest Destruction for Palm Oil in Leuser Ecosystem." September 18, 2023. Mongabay. "Deforestation for Palm Oil Continues in Indonesia's Orangutan Capital." September 2023.
- 36 Chain Reaction Research. "NDPE Policies Cover 83% of Palm Oil Refineries; Implementation at 78%." April 28, 2020. SPOTT. "NDPE Policies in the Palm Oil Sector." March 2018.
- 37 Global Forest Watch. "Tropical Primary Forest Loss Worsened in 2022, Despite International Commitments to End Deforestation." July 27, 2023.
- 38 Mongabay. "Indonesia claims record-low deforestation, but accounting raises questions." July 18, 2023. CDP. "Companies risk almost \$80 BN without action to tackle deforestation in their supply chains." May 2022. Forest 500. "2023: A watershed year for action on deforestation." Accessed September 28, 2023.
- 39 Rainforest Action Network. "Keep Forests Standing." Rainforest Action Network.
- 40 Accountability Framework initiative. "Operational Guidance on Cutoff Dates." June, 2019. Best practice sector wide deforestation and conversion cut-off dates include December 31, 2015 for palm oil, 1994 for pulp and paper, and other dates as per agreements in specific regions such as the Brazil Soy Moratorium. Where sector-wide dates are not set the AFi guidance should be adhered to. Companies with pre-existing commitments with a cutoff date that was earlier than the sector cutoff date should adhere to the earlier date, this includes cut-off dates that are earlier than the December 31, 2020 deadline in the EUDR. Accountability Framework initiative. "Operational Guidance on Cutoff Dates." June, 2019.
- 41 Mondeléz. "ROYAL." Accessed September 28, 2023.
- 42 Accountability Framework initiative. "Definitions." Accessed September 28, 2023.
- 43 Unilever. "People and Nature Policy." December 2020. Kao. "High Risk Supply Chain Management and Sourcing." Accessed September 28, 2023. Colgate-Palmolive. "No Deforestation Policy." Accessed September 28, 2023.

- 44 Tuk Indonesia. "Tycoon in the Indonesian Palm Oil." Accessed September 28, 2023.
- 45 Greenpeace, Auriga, Woods & Wayside, Environmental Paper Network and Rainforest Action Network. "Pulping Borneo." May 2023.
- 46 Royal Golden Eagle Group. "RGE Statement on EPN Report 'Pulping Borneo." May 2023
- 47 Procter and Gamble. "Palm Grievance Tracker." August 2023.
- 48 Mondeléz. "Statement about supply chain relationship with Royal Golden Eagle." May 2023. Mondeléz Palm Oil Mill List. Accessed September 28, 2023.
- 49 Nestlé. "Becoming Forest Positive." June 2021.
- Colgate-Palmolive. "Sustainable Supply of Palm Oil." Accessed September 28, 2023. Nissin Foods "Earth Food Challenge." Accessed September 28, 2023.
- 51 PepsiCo. <u>"2022 PepsiCo Annual Public Reporting on the Roadmap KPIs: Palm oil, Soy, PPP."</u> July 2023. Colgate-Palmolive. <u>"Our Policy on Responsible and Sustainable Sourcing of Palm Oil."</u> Accessed September 28, 2023. Kao. <u>"Kao Sustainability Report."</u> Accessed September 28, 2023. Mondeléz. <u>"ESG Reporting and Disclosure."</u> Accessed September 28, 2023. Nissin Foods. <u>"Sustainable Procurement."</u> Accessed September 28, 2023.
 - Procter and Gamble. "P&G's Forest Commodity Policy." Accessed September 28, 2023.
- 52 Nestlé. "Creating Shared Value." Accessed September 28, 2023.
 - Unilever. "Climate Action." Accessed September 28, 2023. Procter and Gamble. "P&G Accelerates Action on Climate Change Toward Net Zero GHG Emissions by 2040." September 2021. Colgate-Palmolive. "Accelerating Action on Climate Change: How Colgate Is Creating a More Sustainable Future." June 2022. Mondeléz. "ESG Reporting and Disclosure." Accessed September 28, 2023. Mars. "Sustainable in a Generation Plan." and "Net Zero Roadmap." Accessed September 28, 2023. Kao. "Kao Is Aiming to Reduce Its CO2 Emissions to Zero by 2040, and to Be Carbon Negative by 2050." May 2021. Nissin Foods. "Reducing CO2 Emissions." Accessed September 28, 2023. Nissin Foods. (News Release." October 2022. PepsiCo. "2021 ESG Summary Overview." June 2022.
- 53 CLARA. "Net Zero." Accessed September 28, 2023.
- 54 CLARA. "Net Zero and Nature." Accessed September 28, 2023.
 - CLARA. "Corporate Net Zero: Why it's a problem?" Accessed September 28, 2023. CLARA. "No Space for offsets." Accessed September 28, 2023.
- 55 Reuters. "Davos Live." Accessed September 28, 2023.
- 56 Rainforest Action Network. "Keep Forests Standing." Rainforest Action Network.
- 57 Rainforest Action Network. "Global Consumer Goods Giant P&G Quietly Weakens its Forest Degradation Policies Instead of Strengthening Them; Rainforest Action Network Responds." June 30, 2023. Joint NGO Press Release. "Procter and Gamble Again Fails Climate, Forests and Human Rights." August 2023.
- 58 Nissin Foods. "Guidelines and policies regarding the environmental aspects of products." Accessed September 28, 2023.
- 59 Mars. "Deforestation and Land Use Change Position." Accessed September 28, 2023.
- 60 Nestlé. "Deforestation Free Supply Chains." Accessed September 28, 2023.
- 61 PepsiCo. "PepsiCo Stewardship of Forests and Natural Ecosystems Policy." June 2023.
- 62 Procter and Gamble. "P&G's Forest Commodities Policy." Accessed September 28, 2023.
- 63 Mars. "Our Palm Positive Plan." Accessed September 28, 2023.
- 64 Nestlé. "Deforestation Free Supply Chains." Accessed September 28, 2023.
- 65 PepsiCo. "PepsiCo Stewardship of Forests and Natural Ecosystems Policy." June 2023.
- 66 Unilever. "Deforestation-free supply chain." Accessed September 28, 2023.
- 67 Unilever. "Unilever Principles in Support of Human Rights Defenders." September, 2023.
- 68 Unilever. "Palm Oil Grievance Tracker." August 2023. Unilever. "Unilever's Suspended or No-Buy List of Palm Oil Companies." September 2023.
- 69 Nestlé. "Deforestation-free supply chains." Accessed September 28, 2023.
- 70 PepsiCo. "PepsiCo Statement on Human Rights Defenders." May 2022. PepsiCo. "PepsiCo's Refineries List 2022." Accessed September 28, 2023.
- 71 Kao. "Palm Oil Dashboard." Accessed September 28, 2023. Kao. "2022 Activity Report." Accessed September 28, 2023. Kao. "High Risk Supply Chain Management and Sourcing." Accessed September 28, 2023.
- 72 Kao. "Palm Oil Dashboard." Accessed September 28, 2023.
- 73 Colgate-Palmolive. "No deforestation policy." Accessed September 28, 2023.
- 74 Mars. "Mars Palm Positive Plan Delivers Deforestation-Free Palm Oil Supply Chain." October 2020.
- 75 Mars. "Guidance for Suppliers on Land Rights." October 2022.
- 76 Nissin Foods. "Guidelines and policies regarding the environmental aspects of products." Accessed September 28, 2023.
- 77 Nissin Foods. "Environmental Procurement" Accessed September 28, 2023. Nissin Foods. "Nissin Foods Group Palm Oil Grievance Tracker." June 2023.
- 78 Joint NGO Press Release. "Procter & Gamble Again Fails Forests, Climate, and Human Rights." September 2023.
- 79 Unilever. "People and Nature Policy." December 2020. Kao. "High Risk Supply Chain Management and Sourcing." Accessed September 28, 2023. Colgate-Palmolive. "No Deforestation Policy." Accessed September 28, 2023.
- 80 HCV Network. "HCV Network." Accessed October 24, 2023. Intact Forest Landscapes. "Intact Forest Landscapes." Accessed October 24, 2023. High Carbon Stock Approach. "Accessed October 24, 2023. Destruction that is classified as 'forest degradation' and not just that defined as 'deforestation' and 'conversion' must be prevented, especially in wood pulp, packaging and paper, coffee and cocoa supply chains.
- 81 Unilever. "Palm Oil Grievance Tracker." August 2023. Procter and Gamble. "Palm Grievance Tracker." August 2023. Procter and Gamble. "Wood Pulp Grievance Tracker." March 2022. Nissin Foods. "Nissin Foods Group Palm Oil Grievance Tracker."
- 82 Unilever. "Unilever's Suspended or No-Buy List of Palm Oil Companies." September 2023. Nestlé. "Responsibly sourced palm oil." Accessed September 28, 2023.
- 83 Kao. <u>"Kao Grievance List."</u> March 2023.
- 84 Nestlé. "Nestlé Climate Advocacy Industry Associations Review 2023." Accessed September 28, 2023.
- 85 Neslté. "Our palm oil transparency dashboard." Accessed September 28, 2023.
- 86 Nestlé. "Nestlé to pilot new cutting-edge satellite technology to drive transparency in its reforestation projects." April 2023. Unilever. "Earth Reimagining Landscapes." Accessed September 28, 2023.







Rainforest Action Network 425 Bush Street, Suite 300 San Francisco, CA 94108

PUBLICATION DATE: November 2023

PHOTO: Khairul Abdi / RAN; KSPPM