

A close-up photograph of a cacao pod hanging from a tree branch. The pod is a deep red color with a bumpy, textured surface. The background is a soft-focus green, suggesting a forest environment. The pod is the central focus of the image, with its long, curved shape and vibrant color standing out against the natural backdrop.

WWF BASKET: DEFORESTATION AND CONVERSION-FREE COCOA TRADERS' ASSESSMENT

DECEMBER 2025

THE WWF BASKET SETS OUT TWO OVERARCHING MEASURES TO ASSESS PROGRESS FOR DEFORESTATION AND CONVERSION-FREE (DCF) GOALS TIED TO WWF'S GLOBAL VISION, GUIDING PRINCIPLES AND GUIDING ASKS.¹

1

% conversion risk commodity in own supply chains that is verified DCF.

2

% conversion risk commodity sourced from importers that have robust commitments and action plans to handle only DCF material across their entire operations, with a cut-off date no later than 2020.

The second goal is set to measure how the retailer's approach to achieving DCF baskets influences the global market transformation to protect forests. In effect, by sourcing from suppliers that are still commercialising deforestation and conversion, retailers are contributing to a market which is driving land-use change and loss of habitat for commodity production.

To strengthen our assessment of the food retail sector's deforestation and conversion impacts, WWF separately assessed the performance of the major exporters and importers of the three forest risk commodities on which the food retailers rely most heavily: cocoa, palm oil, and soy in animal feed. Within this assessment we refer to both 'first importers' and 'traders'. A first importer brings commodities into a country, while the term 'trader'² covers companies involved in both the importing and exporting of materials as they buy and sell from producer countries and into consumer countries, handling customs and compliance.

This measure assesses retailers on whether they are sourcing from known traders that have robust DCF commitments and action plans. It requires retailers to report the volumes of conversion-risk commodities that they source from known first importers which are major exporting traders of the commodity. The public commitments and action plans of the traders have been assessed separately; the retailer volume data was combined with this assessment to calculate the overall measure.

OBJECTIVE OF THE TRADERS' ASSESSMENT

The assessment of traders was completed to highlight development in the commitments and actions being published in their own reporting, including progress, reporting and on-the-ground investments into the DCF transition to support producers and to achieve and recognise DCF production. The assessment highlights both the progress and the gaps in traders' action plans.

¹ [Deforestation and Conversion Free Supply Chains](#)

² [Customs Civil Penalties Guidance](#)

WHAT IS THIS ASSESSMENT BASED ON?

Public information reported by the companies, mostly shared online through their latest sustainability reports.

WHAT DO WE ASSESS?

Published activities under the following categories in support of deforestation and conversion-free supply chains:

1. Commitments, policies
2. Monitoring and implementation
3. Progress and reporting
4. Investment in landscapes

The indicators included in this assessment are not exhaustive of the critical aspects that should be covered to implement DCF supply chains but have been selected as high level markers of progress and enabling action. These indicators have also been selected based on data available within the public domain for comparable assessment across the sector.

WHAT DO WE NOT ASSESS?

Physical evidence of implementation and DCF sourcing. This is because publicly reported information only describes stated actions and cannot be used to reliably verify effective implementation of the commitment, nor to demonstrate that companies are currently able to supply DCF material.

HOW THE DATA CAN BE USED

By evaluating which suppliers publicly disclose their action plans, we can identify which suppliers are creating pathways for DCF sourcing, how they are doing so, and where more action is needed.

However, to assess if current and potential suppliers can evidence DCF sourcing, greater transparency in the supply chain is required to monitor, report and verify information effectively with regard to UK importers and the impacts of their operations globally.

Robust action plans must evidence the control of origin for materials under the compliance requirements to eradicate deforestation and conversion from all supply chains.

COCOA TRADERS

Ten cocoa traders were assessed based on market coverage: Barry Callebaut, Cemoi Group, ECOM Agroindustrial Corp., Cargill, Fuchs & Hoffman, ICAM, Irca Group, Olam, Touton, Sucden

The human rights abuse and poverty associated with unequitable cocoa supply chains have been highlighted as a social risk to retailers for several decades. However, the food sector has only recently been engaged to report on managing the risk of driving deforestation through cocoa consumption. Both issues must be addressed together in the cocoa sector where a high proportion of growers are known to be living in extreme poverty³, while also facing the increasing effects of climate change on crop production⁴ and the threat of being displaced by mining operations.⁵

We have assessed cocoa traders in alignment with expectations of WWF's Asks for Cocoa⁶ drawing on the comprehensive Voice Network guidance⁷, the Be Slavery Free – Chocolate Scorecard⁸ and the Accountability Framework Initiative.

3 [Empowering cocoa farming families with cash transfers](#)

4 [Chocolate price hikes: A bittersweet reason to care about climate change](#)

5 [Your chocolate is costing more: this is why](#)

6 [WWF Cocoa Guiding Principles and Asks for Retailers](#)

7 [VOICE Network Cocoa Coalition](#)

8 [Be Slavery Free chocolate scorecard](#)

EXECUTIVE SUMMARY

This assessment evaluates ten major cocoa traders on their public commitments, policies, monitoring systems, reporting progress, and investments related to deforestation- and conversion-free (DCF) supply chains. It has a particular focus on alignment with WWF's global expectations and relevant sectoral frameworks, including the Accountability Framework Initiative (AFi), Voice Network guidance, and emerging regulatory requirements such as the European Deforestation Regulation (EUDR). The purpose is to understand the extent to which cocoa traders are enabling the transition to verified DCF cocoa supply chains globally, and how their actions may enable or impede retailers in achieving credible, responsible sourcing goals.

Overall, the assessment highlights uneven progress among cocoa traders, with most companies having partial or incomplete public commitments, limited traceability beyond direct suppliers, and inconsistent disclosure of implementation and impact indicators. While several traders articulated ambitions related to deforestation, human rights, traceability, and living income, only a small subset demonstrated more advanced operational systems, monitoring tools, or landscape-based investments, and no trader showed strong performance across all criteria.

Across traders, commitments and policies were the strongest area of performance, with multiple companies declaring DCF objectives, traceability targets, and human rights due diligence commitments. However, most lacked key robustness in elements such as timebound implementation plans, full value-chain scope (direct + indirect supply), cut-off date alignment, and formalised living income commitments.

In the monitoring and implementation category, only a few traders provided publicly accessible evidence of farm-level traceability, mapping coverage, or deforestation monitoring systems that include indirect suppliers. Reporting on human rights monitoring, child labour remediation, and living income implementation remains inconsistent and largely partial.

The progress and reporting category revealed the most significant gaps. Only one trader reached half of the requirements, and no company demonstrated comprehensive reporting that clearly links environmental and social commitments to measurable milestones and verified outcomes. A lack of transparency, disparate reporting across annual reports and issue-specific or proprietary scheme reports, disaggregated data, and unclear KPI reporting continues to impede comparability and accountability.

On landscape investment, most traders reported at least one initiative related to forest conservation, restoration, or farmer support services. However, these efforts were often fragmented, project-based, and lacking transparent scale and impact metrics, making it difficult to determine whether they meaningfully contribute to long-term ecosystem resilience or systemic supplier transformation.

Key cross-cutting findings across the four categories:

- Public commitments are improving, but maturity and implementation pathways are limited.
- Progress on traceability progress is advancing, but remains uneven, particularly for indirect supply chains.

- Human rights and living income frameworks are under-formalized and insufficiently monitored.
- Reporting lacks comparability and verification, limiting confidence in real-world outcomes.
- Landscape investments are growing, but evidence of impact, scale, and durability is still limited.

This assessment underscores the need for cocoa traders to move from commitment to verifiable implementation, supported by greater transparency, independently validated monitoring systems, time-bound and measurable KPIs, and scaled landscape-level collaboration. Strengthening these dimensions is critical for achieving credible DCF sourcing, protecting high-value ecosystems, and ensuring cocoa production contributes to sustainable livelihoods and resilient communities.



HOW IS PROGRESS CALCULATED?

The results of the assessment of traders' DCF commitments and evidence of implementation of DCF action plans were categorised as follows:

Companies were given a point (1), half point (0.5) or zero score based on review of how they reported against each criterion under the four categories and then given an overall score per category.

Requirements and points available per category:

- **Policy and commitments** with 9 requirements (detailed in Table 2.):
Aligned if $\geq 8/9$;
Partially aligned for $\geq 5/9$ or more;
Not aligned if $< 5/9$.
- **Monitoring and implementation** with 10 requirements (detailed in Table 3.):
Aligned if $\geq 9/10$;
Partial if $\geq 5/10$;
Not aligned $< 5/10$.
- **Progress and reporting** with 5 requirements (detailed in Table 4.):
Aligned if $\geq 4/5$;
Partial $\geq 2.5/5$;
Not aligned $< 2.5/5$.
- **Investment within landscapes** with 3 requirements (detailed in Table 5.):
Aligned = $3/3$;
Partial = $2/3$;
Little or no investments coverage in landscapes $< 2/3$ (red).

Table 1. Overview of results across the cocoa trader sector

COCOA TRADER	COMMITMENT AND POLICIES	MONITORING AND IMPLEMENTATION	PROGRESS AND REPORTING	INVESTMENTS IN LANDSCAPES
A				
B				
C				
D				
E				
F				
G				
H				
I				
J				

KEY

 Aligned

 Partially aligned

 Not aligned

COMMITMENT AND POLICIES

Minimum cocoa commitment requirements

1. Commitment to no deforestation in supply chains by 2025
2. Minimum cut-off 2020 for other regions
3. Commitment to Living Income Policy
4. Commitment to Human Rights Due Diligence policies and implement a Child Labour Monitoring & Remediation System (CLMRS)
5. Commitment to traceability for cocoa supply chains
6. Commitment to covering all direct and indirect suppliers
7. Commitment to covering all sourcing and exports
8. Commitment covering all cocoa materials handled within the traders' operations
9. Validated SBTi FLAG target

Table 2. Cocoa traders – Assessment of commitments and policies

The table below includes the names of traders who achieve 'aligned' or 'partial' scores for this category.

- **Aligned** = $\geq 8/9$ points
- **Partially aligned** = $\geq 5/9$ points;
- **Not aligned** = $< 5/9$ points.

'Alignment on commitments and policies' highlights criteria that were met in public reporting, and 'Gaps in policies' identifies gaps in the reported policies.



ALIGNMENT ON COMMITMENT AND POLICIES

Commitment to no deforestation in supply chains by 2025 by **Barry Callebaut, Cemoi Group, Ecom Agroindustrial** and **Olam**.

With 2020 cut-off date by **Ecom Agroindustrial** and **Olam**

Commitment to Living Income Policy by **Olam**

Commitment to traceability by **Barry Callebaut, Cemoi Group, Ecom Agroindustrial** and **Olam**.

Commitment to publicly transparent human rights Due Diligence policies and implement a Child Labour Monitoring & Remediation System (CLMRS) by **Barry Callebaut, Cemoi Group, Ecom Agroindustrial** and **Olam**.

Commitment scope

- Covering all direct and indirect suppliers by **Barry Callebaut** and **Cemoi**.
- Cover all sourcing and exports by **Cemoi Group**
- Covers all products (materials handled) e.g. beans and cocoa butter by **Barry Callebaut, Cemoi Group, Ecom Agroindustrial**

Validated SBTi FLAG target by **Barry Callebaut** and **Olam**.

KEY

-  Aligned
-  Partially aligned

GAPS IN POLICIES

In total, 7/10 traders lacked minimum 2020 cut-off

Commitment to Living Income Policy

5/10 leading traders scored 'Partial' where they disclosed actions taken to baseline the proportion of farmers in the supply base who are currently receiving a living income but fell short of a formalised publicly disclosed commitment.

CLMRS

Traders that scored partial for CLMRS commitments lacked timebound dates, or stated actions taken within the supply chain to utilise CLMRS systems without an accompanying formal commitment.

Scope of public commitment for the majority of traders did not specify inclusion of indirect suppliers (9/10), all sourcing regions (9/10) and materials handles (7/10).

Validated SBTi FLAG target

One trader has set an aligned target but has yet to have them validated and another has a validated SBTi yet no FLAG target. The rest fail to report on science based aligned targets for reducing land use emissions.

EXAMPLES OF LEADING COMMITMENT AND POLICIES

Olam

- Public commitment to establish systems to identify, prevent and remediate child labour in all high-risk supply chains by 2025, and remediate all identified child labour cases by 2030.⁹
- Has a specified policy to achieve living income for 150,000 farmers by 2030 and 40,000 by 2025, with living income calculated using the Anker Methodology.¹⁰
- Set Scope 1 and 2 emission reduction targets by 50% and Scope 3 by 30% by 2030. Scope 3 includes both FLAG and non-FLAG emissions which have been SBTi validated.¹¹

MONITORING AND IMPLEMENTATION

Minimum monitoring and implementation requirements

1. Monitoring compliance with deforestation and conversion commitments
2. Deforestation monitoring covers direct and indirect suppliers
3. Monitoring compliance with human rights commitments (HRDD and CLMRS)
4. Human rights monitoring and compliance with child labour policy covers direct and indirect suppliers
5. On-site monitoring for all or some of farms
6. Implementing traceability to farm – production unit of origin/plot level data check for commercial deforestation
7. Employing GPS monitoring/satellite monitoring for some or all sourcing
8. Implementing living income policy for all of sourcing
9. Implement commitment by working on wider social needs in producer region
10. Third party verification for all or specific areas of supply

9 [Choices for Change](#)

10 [Choices for Change](#)

11 [Science Based Targets – Target Dashboard](#)

Table 3. Cocoa traders – Assessment reported monitoring and implementation

The table below highlights the names of traders who achieve 'aligned' or 'partial' scores for this category.

- **Aligned** = $\geq 9/10$ points
- **Partially aligned** = $\geq 5/10$ points
- **Not aligned** = $< 5/10$ points

'Aligned monitoring and implementation' highlights criteria that were met in public reporting and 'Gaps in monitoring' identifies gaps in the coverage of reported monitoring.

ALIGNMENT ON COMMITMENT AND POLICIES	KEY  Aligned  Partially aligned
<p>Reported monitoring of compliance with deforestation and conversion commitments and compliance with human rights commitments (HRDD and CLMRS) by Barry Callebaut</p> <p>Implementing traceability to farm – production unit of origin/ plot level data check for commercially driven deforestation by Barry Callebaut and Cemoi Group</p> <p>Employing GPS monitoring /satellite monitoring for some or all sourcing by Cemoi Group</p> <p>Implement commitment by working on wider social needs in producer region by Barry Callebaut and Cemoi Group</p>	
GAPS IN POLICIES	
<p>Lack of reporting on deforestation monitoring, especially farm level monitoring for all or some of farms on indirect suppliers.</p> <p>Several traders have policies to support human rights Due Diligence and Child Labour Monitoring & Remediation System (CLMRS) but 9/10 have significant gaps in reporting on monitoring and compliance on these areas, and most do not mention any processes in place for indirect suppliers.</p> <p>No disclosure on implementation of living income policy by 6/10 traders and gaps in significant details but remaining 4/10.</p> <p>Varied reporting on the % of farmers within supply chains receiving a living income.</p> <p>6/10 traders scored 'partial' for the indicator assessing whether third party verification was in place, as it was not reported to cover all sources of supply. The main gaps for verification processes for those who disclosed methodologies was indirect supply. The rest failed to report on verification process at all.</p>	

EXAMPLES OF LEADING MONITORING AND IMPLEMENTATION

Barry Callebaut developed a risk assessment framework aligned with EUDR deforestation free requirements to identify areas at risk of noncompliance across their entire supply chain. For all indirect cocoa sourced, this traders’ reports use Verisk by Maplecroft Risk Assessment. Verisk quantifies the salient human rights risk at a country and commodity level.

To address wider social needs in producer region, Barry Callebaut developed a white paper¹² in collaboration with Agri-Logic, IDH and Rainforest Alliance to identify approaches to improve the existing cocoa farming model in Côte d’Ivoire, and more broadly in West Africa. They report implementing these with three international child rights organizations (Save the Children, Right to Play & Terre des Hommes) to address socio-economic factors driving child labour, supporting a new community-based approach in Côte d’Ivoire, Ghana, Cameroon and Nigeria.

Cémoi Group reports working to improve farm level traceability and mapping to production unit of origin. ¹³ Cémoi reported in 2025 that 100% of direct farms were mapped in 2025 and that 100 % of direct sourced cocoa is traceable from individual farms to purchase point.

This trader reports using of GPS and/ or satellite monitoring across the cocoa supply base, working with ‘Farmforce’ to ensure 100% of the plot boundaries across all volumes sourced are georeferenced. In support of wider social needs of the producers, they are working in partnership with CSOs in producer regions and provide ongoing support for community improvement initiatives. Cémoi have an ongoing collaboration with the Ministère de Eaux et Forêts (MINEF) in Cote d’Ivoire to help implement a traceability system.

PROGRESS AND REPORTING

Minimum progress and reporting requirements

1. Has clear reporting on milestones achieved against commitment
2. Has traceability to farm-level unit for direct supply
3. Has traceability to farm-level unit for indirect supply
4. Is transparent in reporting on use of risk thresholds and sourcing areas covered
5. Reports progress on managing non-compliance

Table 4. Cocoa traders – Assessment of progress and reporting

The table below highlights the names of traders who achieve ‘aligned’ or ‘partial’ scores for this category.

- **Aligned** = $\geq 4/5$ points
- **Partially aligned** = $\geq 2.5/5$ points
- **Not aligned** = $< 2.5/10$ points

‘Aligned progress and reporting’ highlights criteria that were met in public reporting and ‘Gaps in reporting’ identifies gaps in the coverage of reported progress.

There is a significant deficit in transparent and comparable reporting and progress within the cocoa trader sector for managing risks and opportunities. Only one trader, (Cémoi Group) reached the ‘partial’ threshold for this category. Across all indicators assessed, a common theme was disparate reporting across annual reports and issue-specific or proprietary scheme reports, with a lack of cohesion on KPI progress adding to challenge ascertaining clear progress.

12 [Farmer yield and income in Côte d'Ivoire – an analysis of Farmer Field Books \(FFBs\)](#)

13 [The Cocoa & Forests Initiative: collective action to end cocoa-related deforestation – 2024 progress report](#)

ALIGNMENT ON PROGRESS AND REPORTING

Reporting progress on traceability to farm level for direct supply and managing non-compliance by **Cémoi Group**

KEY

- Aligned
- Partially aligned

GAPS IN REPORTING

Across the cocoa traders there was a lack of:

- Clear reporting on milestones achieved against DCF and Human Rights and Labour commitments

For DCF these gaps included lack of timebound targets and clear explanations of methodologies used to report against KPIs.

For Human Rights & Labour, traders reported disclosure against KPIs such as CLMRS but showed poorer levels of transparency when it comes to reporting against metrics such as % of farmers in supply base receiving a living income.

- No trader reported against progress on traceability to farm level for indirect supply.
- Lack of transparency in reporting on use of risk thresholds used and scope/ sourcing and areas covered by this. Where information is disclosed, it is limited to high-level parameters for risk thresholds such as legal requirements in sourcing countries, but there are clear gaps in terms of lack of disclosure on scope and sourcing areas.

8/10 traders had no progress reported on managing non-compliance. This is a clear gap and critical action point for traders in line with best practice as recommended by the AFi guidance.

EXAMPLES OF LEADING PROGRESS AND REPORTING

Cémoi Group reports progress on traceability to farm-level across the traders assessed for direct supply. Cémoi have invested in their 'Transparence Cacao' programme, which covers five origin countries: Côte d'Ivoire, Ecuador, Peru, Dominican Republic, and São Tomé.¹⁴ This trader has also performed well on the indicator assessing reporting on managing non-compliance in the supply base as they clearly outline steps followed in the annual Transparence Cacao report.

On progress reporting traceability to farm-level, **Ecom**¹⁵ and **Olam**¹⁶ also reported 100% traceability for direct supply.

¹⁴ The Cocoa & Forests Initiative: collective action to end cocoa-related deforestation – 2024 progress report

¹⁵ Ecom - Making strides towards a smarter future

¹⁶ Achieving 100% traceability across our direct global cocoa supply chain

INVESTMENTS IN LANDSCAPES

This section looks at reported investments in landscapes related to AFi core principle 10, ‘Collaboration for landscape¹⁷ and sectoral sustainability’. Investment in high-risk landscapes is critical to support an equitable transition and address the challenges specific to the local communities to enable long-term protection of natural resources and sustainable agricultural production.

Reported on investment in landscapes indicators

- 1. Reports on quantitative and qualitative action to enable DCF production in high-risk regions.
- 2. Invests in forest restoration.

- 3. Collaborates with relevant stakeholders within a defined geography, whether a natural ecosystem or an official territory.
- 4. Incentivizes DCF production with qualitative reporting on services provided.

Table 5. Cocoa traders – Assessment landscape investment

The table below highlights the names of traders who achieve aligned or partial scores for this category.

- **Aligned** = 3/3 points
- **Partially aligned** = 2/3 points
- **Not aligned** = < 2/3 points

INVESTMENTS IN LANDSCAPES
Investing in conservation of protected areas and or forest restoration reported by Barry Callebaut, Cargill, Ecom Agroindustrial, Olam and Touton.
Investing in landscapes by collaborating with all relevant stakeholders within a defined geography, whether a natural ecosystem or an official territory by Barry Callebaut, Ecom Agroindustrial, Olam and Touton.
Reporting on investment in training farmers with qualitative reporting on services provides farmers. Barry Callebaut, Cargill, and Olam.
GAPS IN REPORTING
Across the three categories of investment programme, the majority of traders (7 out of 10) demonstrated evidence of investing in conservation of protected areas and or forest restoration, less than half (4/10) report investing in landscapes by collaborating with all relevant stakeholders within a defined geography or training farmers with qualitative reporting on services provided.

KEY

Aligned

Partially aligned

17 AFi - Collaborate for landscape and sectoral sustainability

EXAMPLES OF INVESTMENT IN LANDSCAPES

Barry Callebaut reports collaborating with Nestlé and 6,000 farmers in Côte d'Ivoire to implement 11,500 ha of agroforestry, with payments for ecosystem services (PES).¹⁸ The implementation of the agroforestry project is underway, with three cooperatives in the South-Western parts of Côte d'Ivoire already engaged in the project, scaling to ten cooperatives and reaching full scale after five years of planting.

Additionally, they report investment in highly degraded forest located in the Moronou region in the Ivory Coast.¹⁹ The project, which began in 2021, intends to restore areas that were formerly primary forests and were deforested due to anthropological influences, especially food and cash crop production.



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¹⁸ [Barry Callebaut and Nestlé partner on large scale agroforestry project in Côte d'Ivoire](#)

¹⁹ [Barry Callebaut — Regenerating natural ecosystems through innovative drone-seeding and monitoring](#)