



**WWF BASKET**



## WWF BASKET: DEFORESTATION AND CONVERSION-FREE TRADERS' ASSESSMENT 2024

The WWF Basket sets out two overarching measures to assess progress for deforestation and conversion free goals tied to WWF's global vision, guiding principles and guiding asks<sup>1</sup>.

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, this year 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'<sup>2</sup> 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.

WWF has assessed the public commitments and action plans of the major first importers for each of these commodities. Based on their public commitments, we categorised each importer as 'Aligned', 'Partially aligned' or 'Not committed'. Secondly, independent of their commitments, the importers were assessed based on reported actions to implement DCF sourcing, for which they were categorised as 'Robust', 'Partial' and 'Weak due diligence'.

---

<sup>1</sup> [Deforestation & Conversion-Free Supply Chains](#)

<sup>2</sup> [CCPG11110 - Persons who must comply with Customs law: Traders - HMRC internal manual - GOV.UK](#)



**WWF BASKET**



For commitments to be considered ‘Aligned’, they must cover all commodities handled by the trader, with a target to achieve DCF supply by 2025, with a minimum cut-off date for conversion of natural ecosystems of 2020, which is aligned with AFI guidance and SBTi FLAG targets.

Action plans were assessed based on traders’ reported actions in relation to monitoring deforestation and conversion risk for direct and indirect suppliers, investment to ensure traceability to a farm-level unit, use of effective satellite technology to monitor compliance, and – particularly for cocoa – provisions to ensure a living income for farmers.

To facilitate an assessment of progress towards this measure against what is known about volumes within the Basket, retailers for the first time reported their sourcing quantities of soy, palm and cocoa for each of their known first importers. While the percentage of volumes for which the first importer was known was limited due to a lack of transparency within the supply chains, the assessment nonetheless gives an insight into the known performance and potential for retailers to source DCF, based on actions already being taken by global shippers.

## **WHAT IS THIS ASSESSMENT IS BASED ON?**

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

## **WHAT DO WE ASSESS?**

Reported commitments and sustainability action plans in support of deforestation and conversion free commodity sourcing,

## **WHAT DO WE NOT ASSESS?**

Implementation and evidence of DCF sourcing. This is because public commitments and described actions assessed in companies public reporting cannot verify with certainty that they are implementing the commitment and does not indicate that they are able to provide vDCF sources as suppliers.



WWF BASKET



## 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.

## SOY TRADERS

### SOY TRADER COMMITMENTS

**Ten soy traders were assessed: ADM, Amaggi, Bunge, Cargill, Caramuru, CEFETRA, CJ Selecta, COFCO, LDC and Viterra.**

The majority of the world's soy production is for animal feed<sup>3</sup>, traded in complex supply chains where it is embedded in products containing meat, dairy and farmed fish. Civil society has highlighted the impact these supply chains have on forests and other ecosystems worldwide when they are converted into large soy plantations. While market demands to manage deforestation risks in the soy sector are well known<sup>4,5</sup>, the disconnection in the supply chain between the soy farmers and UK livestock producers and retailers has made implementing this demand a big challenge. This is further complicated by the large scale of mixing of soy supplies from different traders. As a result, we see less progress for importers of soy than for palm oil. The expectations set in the assessment of soy importers reflect this.

---

<sup>3</sup> [Drivers of Deforestation](#)

<sup>4</sup> [Forest 500](#)

<sup>5</sup> [CDP - Forests](#)



**Table 1a. Soy commitment requirements**

Soy importer commitments	Supplier coverage	Habitats in scope	Cut-off date	Target date
<b>Aligned</b>	DCF covering all supply and biomes	All biomes	Minimum cut-off 2020 and 2008 for Amazon* – (Soy Moratorium) <sup>6</sup>	2025
<b>Partial</b>	DCF covering all supply and biomes	All biomes	Minimum cut-off 2008 for Amazon (Soy Moratorium)  Monitors 2020 as reference for sourcing but not publicly committed	After 2025
<b>Not aligned</b>	DCF covering only direct suppliers and/or indirect suppliers in scope after 2025	Limited to selected region and critical forested biomes not included	No cut-off date	After 2025

**Table 1b. Soy commitment results**

Known importer of soy to UK retailers	Importer	Commitment and gaps
Yes	<b>Caramuru</b>	Aligned DCF covering all supply and biomes with minimum 2025 target and 2020 cut-off date
Yes	<b>CJ Selecta</b>	
Yes	<b>Louis Dreyfus Company</b>	

<sup>6</sup> [Brazil's Amazon Soy Moratorium](#)



Three of the ten soy traders assessed were found to have a public commitment that aligns with the minimum requirements for cut-off date, target date, supplier coverage, and habitats protected. One trader was categorised as partially aligned as that had not publicly committed to the cut-off date for control of origin though they monitor conversion against a 2020 reference date. The remaining six traders were found to have weak public commitments based on the criteria assessed as detailed in **Table 1a**.

## SOY TRADER ACTION PLAN FOR DCF SOURCING

**Table 2a. Soy traders – assessment of the action plans for minimum monitoring criteria review**

Soy trader	Reported action plan
Robust	<ol style="list-style-type: none"><li>1. Implements a traceability system with control of origin for direct suppliers</li><li>2. Implements a socioenvironmental protocol and monitoring system and legality criteria for direct suppliers</li><li>3. Monitors the criteria established by the transparency principles in <a href="#">“Soy on Track”</a></li><li>4. Implements an independent annual audit system on its results</li><li>5. Implements a traceability and monitoring system for indirect suppliers</li></ol> <ul style="list-style-type: none"><li>• Publicly reports in full across all minimum monitoring expectations for DCF supply</li></ul>
Partial	<ul style="list-style-type: none"><li>• Partially reports against <b>all</b> minimum monitoring expectations for DCF supply but does not publicly provide full information and transparency on process to evidence robust due diligence</li></ul>
Weak	<ul style="list-style-type: none"><li>• Not reporting on two or more minimum monitoring expectations</li></ul>

**Table 2b. Soy traders – assessment on action plans based on minimum monitoring criteria review**

Importer	Reported action plan
Amaggi	<ul style="list-style-type: none"><li>• Implements a traceability system with control of origin for direct suppliers</li><li>• Implements a socioenvironmental protocol and monitoring system and legality criteria for direct suppliers</li><li>• Monitors the criteria established by the transparency principles in “<a href="#">Soy on Track</a>”</li><li>• Implements an independent annual audit system on its results</li><li>• Implements a traceability and monitoring system for indirect suppliers</li></ul>

Just one of the ten soy traders assessed were found to publicly report on all the minimum monitoring criteria to effectively source verified DCF soy. It should be noted that this trader is not currently a known supplier to the UK market but great transparency in soy supply chains will shed light on unknown importers and potential sources available to the UK market. Six of the assessed soy importers were identified as partially covering the minimum criteria for DCF monitoring but do not publicly provide full information and transparency on progress to evidence robust due diligence. Four of the assessed soy traders were assessed as having weak action plans based on not reporting on two or more minimum monitoring expectations in their action plans.

## PALM TRADERS

13 palm oil traders assessed based on market coverage: AAK, ADM, APICAL, Bunge, Cargill, COFCO, Golden Agri Resources (GAR), Louis Dreyfus Company (LDC), IFFCO, OLAM, Musim Mas, SD Guthrie (previously known as Sime Darby), Wilmar. Thanks to the work of many civil society organisations, market demand to manage deforestation risks in the palm oil sector<sup>7,8,9</sup> is well established, across a

---

<sup>7</sup> [Forest 500](#)

<sup>8</sup> [ZSL's platform for supply chain transparency](#)

<sup>9</sup> [CDP - Forests](#)



wide range of products. As a result, of consumer and market demand we have seen more progress for importers of palm oil than for soy and cocoa. The requirements set in the categories for alignment on commitments and reported action plans of palm oil importers reflects this: overall, the bar is set higher for palm traders thanks to progress across the sector the last decade.

## PALM OIL DCF COMMITMENTS

**Table 3a. Palm oil commitment requirements**

Palm trader commitment	Commitment and supplier coverage	Cut-off date	Target date
<b>Aligned</b>	Deforestation commitments based on habitat identified as High Conversation Value <sup>10</sup> (HCV) and High Carbon Stock <sup>11</sup> (HSC) approaches to identify habitats, implemented to avoid conversion of natural ecosystems in tropical production areas  All suppliers (direct and indirect)	Minimum cut-off date 2020	Target year by 2025
<b>Partial</b>	Commitment to no deforestation  All suppliers (direct and indirect)	Minimum cut-off date 2020	Target year after 2025
<b>Not Aligned</b>	Commitment to no deforestation  Indirect supply not included in scope OR not included with aligned cut-off and target date	No cut-off date	Target year after 2025

<sup>10</sup> [HCV Approach](#)

<sup>11</sup> [High Carbon Stock Approach](#)

**Table 3b. Palm trader commitment review**

Known importer to UK retailers	Palm importer	DCF commitment
Yes	<b>AAK</b>	<ul style="list-style-type: none"><li>• Deforestation commitment based on habitat identified as HCV or HSC, implemented effectively should avoid natural ecosystems in tropical production areas</li><li>• All suppliers in scope of commitments</li><li>• Target year 2025</li><li>• Minimum cut-off date 2020 or earlier</li></ul>
No	<b>APICAL</b>	
Yes	<b>BUNGE</b>	
No	<b>GAR</b>	
No	<b>LDC</b>	
No	<b>MUSIM MAS</b>	
Yes	<b>OLAM</b>	
Yes	<b>Sime DARBY</b>	
Yes	<b>Wilmar</b>	

Nine of the twelve palm traders assessed were found to have a public commitment that aligns with the minimum requirements for cut-off date, target date, supplier coverage, and habitats protected. One palm trader has been partially aligned commitment but failed to align on target date for verifying their full supply chain. The remaining three palm traders were found to have weak public commitments based on the criteria assessed as detailed in **Table 3a**.





## PALM IMPORTERS ACTION PLAN FOR DCF SOURCING

The following actions are the minimum monitoring actions required within a palm trader's action plan:

1. Supplier monitoring – direct and indirect including third party suppliers
2. Independent verification using third-party assessors
3. Satellite monitoring
4. Collaboration with sector on No Deforestation, No Peat, No Exploitation (NDPE) – At 'Delivering' stage for Implementation Reporting Framework (IRF)<sup>12,13</sup> with independent verification of results
5. Traceability to plantation more than 90%

**Table 4a. Palm traders assessment on action plans for minimum monitoring criteria**

Palm trader	Reported action plan
<b>Robust</b>	<ul style="list-style-type: none"><li>• Supplier monitoring – direct and indirect including third party suppliers</li><li>• Includes independent verification using third-party assessors</li><li>• Satellite monitoring</li><li>• <u>Collaboration with sector No Deforestation, No Peat, No Exploitation (NDPE) – At 'Delivering' stage for Implementation Reporting Framework (IRF)</u><sup>11,12</sup> with independent verification of results.</li><li>• Traceability to plantation more than 90%</li></ul>
<b>Partial</b>	Partially reports against all monitoring requirements above Does not monitor indirect suppliers <b>OR</b> has no independent verification reported
<b>Weak</b>	Not monitoring indirect suppliers Not reporting use of satellite monitoring Traceability to plantation less than 90% No traceability to plantation reported

<sup>12</sup> [NDPE Implementing Reporting Framework](#)

<sup>13</sup> [How to use the Implementation Reporting Framework to report in alignment with AFI best practice](#)



**Table 4b. Palm traders assessment on action plans based on minimum monitoring criteria**

Known importer to UK retailers	Palm importer	Reported DCF action plan
Yes	<b>AAK</b>	<ul style="list-style-type: none"> <li>• Supplier monitoring – direct and indirect suppliers</li> <li>• Employs satellite monitoring</li> <li>• Includes independent verification using third-party assessors</li> <li>• NDPE IRF – CU verified</li> <li>• Traceability to plantation 93-99% (*latest reported at time of publication)</li> </ul>
No	<b>APICAL</b>	
Yes	<b>BUNGE</b>	
Yes	<b>GAR</b>	
No	<b>MUSIM MAS</b>	
Yes	<b>Sime DARBY</b>	
Yes	<b>Wilmar</b>	

Seven of the eight palm traders assessed were found to publicly report on all the minimum monitoring criteria to effectively source verified DCF palm oil. One of the assessed palm importers was identified as partially covering the minimum criteria for DCF monitoring but only reports monitoring direct suppliers and not volumes from third-party suppliers. The remaining four of the assessed palm traders were assessed as having weak action plans based on lack of satellite monitoring deforestation in sourcing areas, not monitoring indirect and third-party suppliers and having less than 90% traceability to plantation for monitored suppliers.



## COCOA TRADERS

Ten cocoa traders assessed based on market coverage: Barry Callebaut, Baronie, Cémoi Group, Ecom Agroindustrial Corp., Cargill, FUCHS & HOFFMANN GMBH - KRÜGER GROUP, ICAM, irca Group, Olam, Touton.

The human rights abuses 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 poverty,<sup>14</sup> while also facing the increasing effects of climate change on crop production<sup>15</sup> and the threat of being displaced by mining operations<sup>16</sup>.

As the cocoa sector's progress in relation to monitoring and reporting on deforestation risks is behind that of palm oil and soy, the expectation for cocoa traders is lower than for these sectors. For this reason, we have assigned cocoa traders that have a public commitment to monitoring deforestation risks and increasing traceability for due diligence but have not yet specified a cut-off date or target date/year as being partially aligned with the expectation that they have the potential to meet DCF goals.

That said, the minimum asks must be strengthened going forward, to align with other forest risk commodities – and thus alignment expectations will be higher from 2025 onwards, as detailed in WWF's asks for cocoa<sup>17</sup> drawing on the comprehensive [Voice Network](#)<sup>18</sup> guidance and the [Be Slavery Free](#) – Chocolate Scorecard<sup>19</sup>.

---

<sup>14</sup> [Empowering cocoa farming families with cash transfers](#)

<sup>15</sup> [Chocolate price hikes: A bittersweet reason to care about climate change](#)

<sup>16</sup> [Your chocolate is costing more: this is why](#)

<sup>17</sup> [WWF Cocoa Guiding Principles and Asks for Retailers](#)

<sup>18</sup> [VOICE Network Cocoa Coalition](#)

<sup>19</sup> [Be Slavery Free chocolate scorecard](#)



## COCOA IMPORTER COMMITMENTS

- Commitment to no deforestation in supply chains by 2025
- Minimum 2020 cut-off date
- Human rights due diligence remediation for all child labour cases identified for entire supply chain by 2025
- Commitments must cover all direct and indirect suppliers
- Commitment to traceability

**Table 5a. Cocoa trader commitment rating**

Cocoa trader commitment	Commitment and supplier coverage	Traceability and suppliers	Social policy
<b>Aligned</b>	Commitment to no deforestation in supply chains by 2025  Minimum <u>2020 cut-off date</u>	Commitment to traceability  Commitments must cover all direct and indirect suppliers	Human rights due diligence remediation for all child labour cases identified for <u>entire supply chain</u> by 2025  Commitment to living income policy
<b>Partial</b>	<b>Committed to monitoring deforestation risks and increasing traceability for due diligence</b>  No reported cut-off date or target date	No public reported commitment to traceability across supply chains	Public commitment to supporting living income and child labour-free supply chain but a detailed public policy specified
<b>Not Aligned</b>	No reported commitment to reduce deforestation	No reported public commitment to traceability across supply chains	No reported policy on human rights or labour



**Table 5b. Cocoa trader commitment review**

Known importer to UK retailers	Cocoa importer	Description on gaps in commitment * All natural ecosystems should be protected from commercial demands
Yes	<b>Barry Callebaut</b>	<ul style="list-style-type: none"> <li>Commitment to no deforestation in supply chains by 2025 with minimum <u>2020 cut-off date</u> for all suppliers</li> <li>Clear commitment to due diligence to address human rights issues for <u>entire supply chain</u></li> <li>Commitment to traceability</li> </ul> <p>*Conversion free commitment not explicitly reported – as per AFI<sup>20</sup> guidance <a href="#">here</a></p>
Yes	<b>Ecom Agroindustrial Corp.</b>	
Yes	<b>Cémoi Group</b>	
No	<b>Touton</b>	

Four of the ten cocoa traders assessed were found to have a public commitment that aligns with the minimum requirements, including an aligned cut-off date, target date, and supplier coverage. The remaining six cocoa traders were found to have weak public commitments based on the criteria assessed as described in **Table 5a**. While some traders have DCF commitments, the results of this assessment do not verify whether they are implementing these commitments or confirm their ability to provide vDCF-compliant sources as suppliers.

<sup>20</sup> [AFi – Deforestation and Conversion](#)



## COCOA TRADERS ACTION PLAN FOR DCF SOURCING

Table 6. Cocoa traders assessment on action plans based on minimum monitoring criteria

Cocoa trader	Reported DCF action plan
<b>Robust*</b>	<ul style="list-style-type: none"> <li>Monitoring compliance with deforestation, conversation, and human rights commitments</li> <li>Implementing traceability to farm, as well as on-site monitoring</li> <li>Employing GPS and robust satellite monitoring</li> <li>Must have policy to support living income and address risk of child labour in production and monitor compliance</li> <li>Implementing support to ensure a living income and address wider social needs in producer region</li> <li>Monitoring must cover direct and indirect suppliers</li> </ul> <p>*Conversion free commitment, all natural ecosystems should be protected from commercial demands</p>
<b>Partial</b>	<ul style="list-style-type: none"> <li>Reporting monitoring deforestation risks and increasing traceability for due diligence</li> <li>Commitment to supporting living incomes, a child labour-free supply chain, full public policy not specified</li> <li>Employing GPS monitoring</li> <li>Refer to living income policy focused on selected sourcing region</li> <li>No target stated or after 2025</li> <li>No 2020 cut-off date reported <ul style="list-style-type: none"> <li>Does not monitor indirect suppliers <b>OR</b> has no independent verification reported</li> </ul> </li> </ul>
<b>Weak</b>	<ul style="list-style-type: none"> <li>No reported monitoring deforestation risks and increasing traceability for due diligence</li> <li>No reported implementation of support to provide living income and addressing social needs in producer region for cocoa</li> </ul>





WWF BASKET



## COCOA TRADERS ASSESSMENT OF ACTION PLANS

None of the assessed traders publicly report on all minimum monitoring requirements. Nonetheless, nine of the ten traders assessed reported on activities with partial status, according to criteria covered in **Table 6**. Whilst these traders cannot be considered ‘robust’ in this assessment, they have the potential to implement more effective action plans by building on their current activities with a living income reference price, satellite monitoring and traceability to farm to eradicate deforestation and conversion from supply chains.

