

MINIMUM MONITORING CRITERIA FOR DEFORESTATION AND CONVERSION-FREE (DCF) PRODUCTS

For commodities originated in Brazil (soy, maize, cotton) – to be performed by first aggregator (trader, crusher, storage silos, cotton gin).



A Publication organized by
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FOREWORD

The World Wide Fund for Nature Brazil (WWF-Brazil), The Nature Conservancy (TNC Brasil), The World Resources Institute (WRI Brasil), and the Forestry and Agricultural Management and Certification Institute (Imaflora) have collaborated to adapt the Accountability Framework Initiative (AFi) operational guidance for grains (soybean, maize, and cotton) production in Brazil. Together, we have established clear, minimum monitoring criteria to define deforestation- and conversion-free (DCF) sourcing of grains products in alignment

with the AFi. These criteria enable companies to make credible, qualified DCF claims—distinguishing them from unverified assertions.

This guide outlines how traders, cooperatives, local warehouses, crusheries, and cotton gins can monitor direct and indirect grains procurement to ensure compliance with DCF sourcing standards in Brazil. Companies with robust traceability systems that meet these criteria—and can demonstrate adherence—are positioned to credibly assert DCF compliance.

We recognize that the DCF principles and criteria set by the AFi exceed the requirements of both Brazilian national legislation and the European Union Deforestation Regulation (EUDR). While voluntary, their adoption reflects a genuine commitment to transforming commodity sourcing decisions and advancing sustainability.

Many companies already align their policies and operations with these criteria, demonstrating leadership in sustainable sourcing. Their efforts merit stronger market recognition and expanded opportunities. Meeting these DCF standards not only supports compliance with deforestation regulations and certifications but also facilitates a secure transition toward phasing out deforestation—a key objective of the 2030 Global Climate Agenda.

This guide consolidates the minimum operational criteria for companies sourcing Brazilian soy, maize, and cotton, ensuring that these commodities are deforestation and conversion-free. By doing so, it helps curb speculative deforestation and conversion, which endanger ecosystems, biodiversity, and global climate stability.

Designed for first-aggregators slaughterhouses, meatpackers, and tanneries—this guide targets critical supply chain actors where control of origin and monitoring is most effective. Fully aligned with the AFi operational guidance, it serves as a Brazil-specific reference for the initiative. Moreover, by mandating farm-level traceability to verify DCF volumes, this guide supports compliance with the EUDR.





MINIMUM MONITORING CRITERIA

- All suppliers, direct and indirect, must be monitored.
- There must be an independent, third-party, auditor to verify the monitoring system and produce annual reports attesting compliance and reporting non-compliant sourcing.
- Mass balance applied to different sources of origination does not provide evidence to support DCF claims, which can only be achieved through physical segregation.
- The implementation of such a monitoring protocol can follow a risk assessment, as indicated below, if the company decides to prioritise areas for monitoring.
- Prioritization must be used as a step towards full traceability to the level of the property, in a specified timeline and short-term implementation plan. Also, the risk assessment methodology must be clearly detailed.
- Nevertheless, companies must establish all-encompassing deforestation and conversion-free commitments, covering all types of natural ecosystems.
- Companies must establish their own cutoff and target dates, but it is strongly recommended that companies follow the Accountability Framework Initiative's (AFi) operational guidance on cutoff dates:
 - » Cutoff dates should be July 2008 for the Amazon biome, following the sector agreement of the Amazon Soy Moratorium, and no later than December 2020 for all other natural ecosystems.
 - » Cutoff dates can never be set in the future. They must be set at least for the day the policy or commitment is announced, as future cutoff dates actually encourage 'race to the bottom' deforestation.
 - » Target dates must be no later than December 2025, and companies that do not comply must explain why they are not following the sector practice.

- A traceability mechanism, with control of origin, identifying the farm origin and all intermediary farms, must be in place.
- A blocking system must be in place to block farmers/ suppliers who are found with the following circumstances:
 - » Deforestation or conversion after 2008, if in the Amazon biome.
 - » Deforestation or conversion after 2020, if in all other biomes.
 - » Areas embargoed by Brazil's federal environmental enforcement agency (IBAMA).
 - » Areas embargoed by states' environmental enforcement agencies.
 - » Overlaps with Indigenous Lands with status "declared" or more advanced in the demarcation process.
 - » Overlaps with Quilombola lands.
 - » Overlaps with protected areas.
 - » Overlaps with public and non-designated areas.
 - » Areas not compliant with the Green Grain Protocol of the Pará State.
 - » Farmers and companies listed in the Slave-like Labor List produced by the Ministry of Labor.
- A remediation protocol should be in place to unblock non-compliant farmers and requalify them to return to the companies' supply base. This remediation protocol must have the minimum conditions:
 - » The area deforested or converted after the cutoff date must be isolated from production or from other productive fields, and a restoration or natural regeneration plan must be presented and monitored in a continuous and effective way;
 - » The farmer or producer company must sign a contract committing not to clear any other native vegetation anywhere else in the future;
 - » Complementary investment and financial measures can be proposed by the blocking trader or a pool of companies to incentivize farmers to expand their production onto degraded pasturelands or other lands opened before the cutoff date of the respective biome. Therefore, blocked farmers can have access to this funding to remediate deforestation and conversion if they agree to sign the conditions above.

- Establish an oversight group including civil society organizations with active access to a sufficient level of transparency information relevant to conduct independent verifications of purchases until the farm level.

Specific and publicly available datasets are described below to analyse and cross-check with information on suppliers and traceability.



M - MONITOR

First aggregator/ originating company in Brazil: Downstream companies

ACTION

Assess performance and risk of non-compliance across the portfolio

DETAIL

The risk assessment according to the company's commitments is the first stage of the whole monitoring process, to provide the first snapshot of the risk in the supply base. The risk must be measured by quantitative and qualitative performance levels and followed by implementation plans to achieve the environmental and social targets of the company. Ensure that impacts on all natural ecosystems are covered throughout this protocol, not only on forests.

Two key elements of non-compliance need to be considered:

(i) The assessment of non-compliance risk in a sourcing territory

- This risk can be analysed in the territory where the company is sourcing and depends on external factors (e.g., other companies, public policies and producer adherence to good practices.)

- Examples of indicators include the cotton/soy/maize deforestation and conversion (DC) footprint in the territory (annual DC associated with cotton/ soy/ maize expansion), the share of non-compliance within the territory, and the existence of public policies that contribute to sustainable production, such as producer incentives for conservation and public traceability initiatives.

(ii) The performance of the company on non-compliance within its operations

- Examples of indicators include the share of non-compliant volume in the operations or the number of reported cases of non-compliance, the share of the supply chain covered by farm-level traceability, the share of indirect suppliers in the operations, the existence of a purchase control/blocking system, the existence of a program of engagement for non-compliant producers, and the share of cases followed up by the company, e.g., through exclusion from the supply base.

Traceability to the whole property polygon level, including all indirect suppliers, should be reached for all sourcing. If all indirect suppliers are not covered from the beginning, publish an engagement/ implementation plan no later than the first annual report. In this case, achieving full traceability to the farm polygon should be progressively achieved through predefined and transparent targets and correspondent timelines, prioritizing the riskiest settings (region/municipalities/farms), becoming a mainstreamed practice for the entire supply base. Note: volumes not traced to the farm polygon cannot be claimed as deforestation – and – conversion-free.

The methodology for risk assessment and the level of information about direct and indirect traceability should be clearly described in the company's implementation plan towards DCF.

ACTION

Collect and present broken-down data on direct and indirect suppliers and traceability information to the farm polygon level

ACTION

Cross-check information against data points to evaluate compliance with DCF and due diligence requirements, including respect for human rights (forced labour, possible encroachment of properties over indigenous peoples and/or traditional communities, non-designated public areas' territories and environmental embargos).

ACTION

Engage with suppliers and promptly up the findings with concrete action points and improvement plans, including the exclusion and reintegration of suppliers from the supply base when necessary.

ACTION

Engage with suppliers and demand the collection and presentation of broken-down data per biome on all supplier farms and traceability information to the farm polygon level.

ACTION

Develop a common and harmonised system for collecting and maintaining the integrity of accurate and reliable data on imported commodities.

DETAIL

Data points to be collected and cross-checked can be found below the monitoring criteria table in this document, [here](#).

The list of data points shall be updated at regular intervals to account for relevant changes affecting the quality and availability of data.

It may be insufficient to assess human rights risks and impacts in practice based on the available data points. Hence, further actions must be taken to address this issue, including unannounced field visits and inspections.

References for engagement with suppliers according to robust metrics include the [AFI Common Methodology for Reporting and Assessment](#), and the [Environmental Due Diligence Guidelines For Purchasing of Brazilian Products by the European Union](#), which was produced by the Brazilian Association of the Environmental Public Prosecutors Offices and details the relevant Brazilian legislation to be checked in a due diligence process.



M - MONITOR

First aggregator/ originating company in Brazil. Downstream companies

ACTION

Conduct real-time monitoring of indicators and alerts generated via satellite, to enable timely blocking of entry for non-compliant soy/ maize/ cotton shipments. Enable access to this monitoring information downstream in the supply chain (e.g. to feed producers and feed buyers in China).

DETAIL

Ensure systems do not only rely on the annual PRODES data but also monitor Mapbiomas Alerts and DETER systems. Additional data from private third parties or own systems may also be used. In the case of purchases in the Amazon, monitor farmers' compliance with the Soy Moratorium and the Pará Green Protocol as benchmarks for areas that can be used interchangeably.

ACTION

Store geo-referenced information securely for a minimum of five years, ensuring the integrity of the information along the supply chain and avoiding the potential of tampering with the data. Manage and organise the information effectively to enable transparency measures, including information about external audit processes.

DETAIL

Ensuring the integrity of data along the supply chain to the required level of granularity and scope is essential to enable credible traceability and compliance with sourcing and MRV requirements.

Secure storage and management of the data is key to ensure integrity and to enable transparency and sharing of data to relevant stakeholders, both along the supply chain and to the oversight group.

ACTION

Analyse the data at regular intervals to identify areas for improvement, set targets, and develop action plans to address performance gaps.



DATA POINTS TO ANALYSE
AND CROSS-CHECK
WITH INFORMATION
ON SUPPLIERS AND
TRACEABILITY

NB: It may be insufficient to assess human rights risks and impacts in practice based on the available data points. Hence, further actions must be taken to address this issue, including unannounced field visits and inspections.

Category	Parameters	Data source
PUBLIC LAND	No overlap with indigenous lands	FUNAI (National Indigenous Foundation – Indigenous Lands)
	Protected areas	ICMBio
	Quilombola communities	INCRA (National Institute of Colonization and Agrarian Reform – Quilombola Territories)
	Public glebas - Non-designated areas	National Institute of Colonization and Agrarian Reform (Incra)
PRIVATE INFRASTRUCTURE	Silos	
	Crushers	
	Cotton Gin	
PRIVATE LAND AND DOCUMENTATION	Property boundary	SIGEF (Incra)
	Land polygon, permanent protected areas and legal reserve	CAR (SICAR)*
	State or municipal LAR or Application Protocol, according to local legislation	LAR (Rural Environmental Licence), when applicable
LAND USE AND LAND COVER TYPES	Cotton - Soybean	Mapbiomas, Agrosatélite or other relevant sources of data
	Pasture	Mapbiomas, Atlas das Pastagens or other relevant sources of data
	Native vegetation <i>Forest/Cerrado/Mangrove/Wetland/Grassland</i>	IBGE - Vegetation classification, MapBiomas, Cerrado map from FIP Project (INPE) or other relevant sources of data

DEFORESTATION AND CONVERSION	Overlap with deforestation/ conversion polygons over 1 hectare since August 1st 2020	MAPBIOMAS Alerta - Land use and land cover change, Alerts
		PRODES (Deforestation Monitoring) – INPE – National Search Institute Space
		DETER – INPE – National Institute for Space Research
		Other relevant sources of data
EMBARGOES, HUMAN RIGHTS AND ENVIRONMENTAL INFRACTIONS	Illegal Deforestation lists of state and federal units that make the information available for public consultation.	Corporate (CNPJ) or individual (CPF) registry number in federal or state embargoes lists. Consider only environmental embargoes due to deforestation/conversion. Consider owner and tenant/partner in analysis.
		IBAMA-SINAFLOR
		ICMBio
		SEMA-MT / Mato Grosso or equivalent state-level data whenever available.
	Brazilian Forced Labour List	Corporate (CNPJ) or individual (CPF) registry number of producers, suppliers and properties in the official forced labour public list. Consider all farms linked to the same CNPJ/CPF.
		MTPS - Ministry of Labor and Social Security.

* It is important to note that the registration process in CAR is self-declaratory, and any inconsistencies are typically identified only during expert assessments. Currently, the SICAR database encompasses more than 6,643,633 properties, but the progress of expert assessments is proceeding at a relatively slow pace (approximately 23%). However, this self-declaration serves as the initial step in the formalization of rural property, and it can be utilized for audits related to the EUDR (EU Deforestation Regulation).

The OECD Business Handbook on Deforestation and Due Diligence in Agricultural Supply Chains and the Accountability Framework are among key resources highly relevant to this initiative and draft protocol.

