



Department  
for Environment  
Food & Rural Affairs

# Consultation on the introduction of due diligence on forest risk commodities **Summary of responses and the Government's response**

November 2020



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# Executive summary

## Proposal and consultation purpose

The UK Government recently consulted on its proposal to introduce world-leading legislation designed to contribute to global efforts to protect forests that are coming under threat from the expansion of agriculture.

At its core, this proposal would do 3 main things. It would:

- prohibit larger companies from using agricultural commodities that have not been produced in line with laws in the countries where they originate
- require those companies to undertake due diligence, so checking for risks of illegal deforestation in their supply chains
- require companies to publish information about their due diligence exercise

Companies that do not comply with these rules would be subject to fines.

Combined, these measures are designed to send a signal that there is no place on the UK market for products that come from illegal deforestation, and that we wish to work in partnership with governments in producer countries to support their efforts to tackle the problem.

## Number and profile of respondents

In total 63,719 responses to the consultation were received. This was made up of:

- 1,147 responses through the online questionnaire on Citizen Space
- 62,572 responses via email, 62,506 of which were campaign responses and 65 of which were not
- 1 response received via post

4,491 responses addressed the consultation questions and 59,228 responses did not. We have made this distinction because it allowed us to undertake question-specific analysis and to ensure that headline figures accurately reflect those who responded to the relevant questions and themes.

Those that did not address the consultation questions were received through a WWF campaign. The 59,228 responses received through this campaign have been analysed thematically, with numbers noted in relevant sections, because this enables trends within responses that directly addressed the consultation questions to be better understood.

Responses were received from the UK public and organisations (from both the private sector and civil society), as well as from abroad (including foreign governments), allowing for a broader understanding of sentiments pertaining to due diligence for forest risk commodities.

## Summary of responses

Overall, respondents strongly welcomed the proposal to introduce a due diligence law for forest risk commodities used in the UK. Feedback was submitted on the proposal's level of ambition, how it ought to be implemented to maximise impact, and to whom it should apply.

59,228 responses were identical and received through the WWF campaign. These urged the Government to introduce legislation to remove deforestation and habitat conversion from products imported in the UK, and to do so urgently in the Environment Bill.

4,491 responses addressed the closed answer consultation questions. Not all respondents addressed every question, so the number of responses and breakdown of who responded varies by question. A maximum of 4,458 responses were received to any single closed answer question. 3,277 responses were received to each closed question through the Traidcraft Exchange and Global Witness campaigns, and a maximum of 1,181 responses were received to any closed question not linked to a specific campaign.

3,817 respondents addressed the consultation's open answer question on who the proposal should apply to. 2,637 shared views in response to the open answer question on the extent to which there are opportunities to align the proposal with existing international reporting frameworks. 3,811 respondents provided additional information and comments, sharing more detailed qualitative views on the proposal. To each of these open answer questions, 3,278 responses were received through the Global Witness and Traidcraft Exchange campaigns, and up to 539 were independent responses, not linked to a specific campaign.

Quantitative outcomes and qualitative views (including those received through the WWF campaign) are summarised below.

### Quantitative outcomes

Of those who provided responses to the relevant closed answer questions in the consultation:

- 4,422 (99%) respondents agreed that Government should introduce legislation to make forest risk commodities more sustainable
- 4,397 (99%) respondents agreed that it should be illegal for businesses to use forest risk commodities in the UK if they have not been produced in accordance with relevant laws in their country of origin

- 4,417 (99%) respondents agreed that businesses in the UK should be subject to a forest risk commodity due diligence requirement
- 4,387 (98%) respondents agreed that businesses in the UK should be required to report publicly on their due diligence system
- 4,387 (98%) respondents agreed that the government should be able to levy fines where businesses use forest risk commodities not produced legally
- 579 (13%) respondents agreed that the legislation should apply to larger businesses over an employee and turnover threshold. 95 respondents (2%) disagreed, while 3,783 (85%) selected “Other” and provided additional feedback as to why.

## Qualitative views

The WWF campaign, through which 59,228 identical qualitative responses were received, strongly supported the introduction of legislation to remove deforestation and habitat conversion from products imported in the UK. These responses urged the UK government to take urgent action through the Environment Bill to do so.

Of the 3,811 responses that provided more detailed qualitative views on the proposal, 3,444 (90%) stressed that the proposal could go further. Respondents referred to the need to protect other ecosystems, go beyond legality, and include the finance sector. 3,247 (85%) specified that the proposal’s environmental focus needs to go hand in hand with consideration of human rights issues. 2,458 (64%) respondents specifically referred to indigenous rights. Many respondents outlined that the proposal, albeit welcomed, ought to form part of a wider approach to tackling environmental and social issues through both legislative and other measures. Some expressed concern over the strength of measures in local laws and the risk of deregulation.

A number of respondents stressed the need for robust enforcement for a due diligence law to have its intended effect, 2,250 respondents (59%) providing detailed views specifying that fines needed to be sufficiently high to deter poor practices. Respondents also emphasised the need for the Government to review the legislation at sufficiently regular intervals.

3,667 (96%) of the responses that addressed the proposal’s scope stressed that the proposal should apply to all businesses, not just large businesses. 2,304 (60%) did emphasise, however, that the proposal ought to apply differently to different businesses, for example through proportionate fines.

89 responses (17% of qualitative non-campaign responses) addressing the proposal’s scope highlighted that using company size as the threshold to determine businesses in scope would not achieve the intended impact. Building on this feedback, 58 submissions (11% of qualitative non-campaign responses) predominantly from businesses, industry associations, and non-governmental organisations outlined a case for setting a threshold to determine businesses in scope based on volume of commodity used in the UK.

Overall, businesses outlined strong support for a due diligence system, including reporting requirements and the option for government to levy fines. A smaller number of responding businesses highlighted the ways in which a due diligence system on forest risk commodities presents challenges to business. These concerns were related to cost, traceability, and evidence requirements.

50 respondents (9% of qualitative non-campaign responses) also referred to the need to support countries where forest risk commodities originate given the requirements that a due diligence system may place on them, referencing examples such as payments for ecosystem services.

239 (9%) of the 2,637 responses that commented on whether there are opportunities to align the proposal with existing international reporting frameworks agreed. The 2,227 (84%) respondents that disagreed explained that existing international reporting frameworks have gaps, are voluntary, and/or are not abided by, and as such do not go far enough. Most of these specified support for alignment with the recommendations of the Taskforce on Climate-Related Financial Disclosures, but also mentioned a range of other frameworks, including the Accountability Framework Initiative and the OECD's Multinational Enterprise Guidelines. 51 respondents (12% of the non-campaign responses sharing views on alignment with existing frameworks) highlighted the opportunity and need to align the proposal with international and domestic human rights reporting requirements, in many instances naming the Modern Slavery Act.

## **Government response**

### **We will introduce an amendment to the Environment Bill placing new responsibilities on larger businesses using forest risk commodities in their supply chains**

The consultation has indicated strong support to act in this area and to do so urgently. This feedback is in line with the Global Resource Initiative, which also recommended that the Government should introduce a due diligence obligation. Based on the consultation and the work of the GRI, the Government will lay an amendment to take primary powers in the Environment Bill to enable us to implement the framework of our proposal.

### **We will maintain an approach based on legality**

There was strong support for introducing a prohibition on using products in the UK that had been grown on land subject to illegal deforestation. Some businesses and NGOs wanted us to go further by including additional sustainability requirements. However, we will maintain a legality-based approach because we believe that supporting national governments' own efforts provides the best path to long-term sustainability.

We will also provide a pathway to recognise national standards and certification schemes, which will create a framework for on-going dialogue on environmental standards and legislation with nations that produce forest risk commodities.

The legality-based approach provides a common, minimum floor that major businesses will have to satisfy, but it does not, of course provide a ceiling: businesses may choose to go further in terms of the standards they set for themselves.

### **Addressing human rights risks in all kinds of business activity**

While we agree that in some circumstances there is a relationship between commodity production and human rights, it doesn't follow that the best solution to tackle these two issues is the same.

Tackling human rights abuses requires an approach that is tailored for that purpose. One way we are doing that is through our adoption of the UN's Guiding Principles on Business and Human Rights – an internationally agreed framework for addressing human rights risks in all kinds of business activity. These principles encourage businesses to adopt due diligence approaches and to address any negative impacts where appropriate.

We recognise the role indigenous people can play in protecting forests and that a number of countries have national laws that require changes in land use to be supported through free, prior and informed consent (FPIC) of local communities. These laws would be in scope of the proposed regulation.

### **We have refined how we will decide which companies are in scope**

We have decided to remove the use of an employee number threshold to define businesses in scope. Instead, we will focus on turnover.

We are also responding to feedback by providing an exemption for larger companies who use only very small quantities of a commodity.

### **We will aim to maximise alignment of reporting associated with this regulation and other reporting requirements**

We will align our reporting period and deadline so that they align with the Modern Slavery Act transparency in supply chains requirement, which means businesses will have six months to report after the end of the UK financial year.

We will continue to support the development of the Taskforce on Climate-Related Financial Disclosures and the Taskforce of Nature-related Financial Disclosures. We will also aim to maximise alignment of reporting associated with this regulation with the needs of the financial sector, informing decision-making by enabling investors to access information regarding the impact of different businesses on illegal deforestation.



## **The final, operational details of the proposal will be implemented through secondary legislation, which will be subject to further consultation**

The new requirements will only come into force once further, secondary legislation has been passed. Our proposals for secondary legislation will be subject to further engagement with key stakeholders as well as formal consultation. This will consider which commodities will be prescribed, the thresholds that determine which businesses will be subject to the requirements, the precise information businesses will be required to report on and the level of fines.

## **We will regularly review the effectiveness of the law**

This is a pioneering piece of legislation. The UK would be among the first to introduce this type of regulation. In order to ensure that it achieves its intended impact, we will include a review clause in primary legislation. This will require the Government to review the way in which the law is working, and to explain to Parliament how any issues will be addressed.

## **Due diligence legislation is only one part of a bigger package of measures we are taking to tackle this problem**

The proposed legislation is only one part of a much broader package of measures that the UK Government is putting in place to ensure a broader shift towards low-carbon, nature friendly production of key commodities. Alongside this document, we are publishing the Government's response to all the recommendations of the Global Resource Initiative (GRI), of which the introduction of a due diligence requirement was one. This includes the ways in which we are using the UK's International Climate Finance to support producers to transition to more sustainable land-use models as well as a commitment to forge a long-term partnership between governments to address the issue as part of our Presidency of COP26 of the United Nations Framework Convention on Climate Change (UNFCCC).

# Introduction

It is vital that the recovery from COVID-19 helps us to build a greener, fairer and more resilient global economy. Protecting precious forest environments is central to tackling climate change and biodiversity loss. Forests can absorb up to 7% of total global greenhouse gas emissions each year<sup>1</sup>, and provide more than 86 million green jobs globally.<sup>2</sup>

80% of deforestation is linked to the expansion of agriculture, including the production of commodities that have become integral to much of the food we eat and the household products we use every day here in the UK.

The UK Government is firmly committed to tackling the twin challenges of climate change and biodiversity loss, and reducing deforestation linked to agriculture is central to both. As President of COP26 of the UNFCCC we are working to forge a new alliance between governments to ensuring global supply chains are sustainable. In September 2020, the Prime Minister signed the Leaders' Pledge for Nature, committing the UK to support sustainable supply chains, and encouraging practices that regenerate ecosystems<sup>3</sup>.

Our lives and our livelihoods are inextricably linked to the natural ecosystems which enable us to grow our food, regulate the climate, provide us with clean air and water, and protect our homes and businesses from floods. The emergence of diseases such as Ebola are associated with the destruction of natural habitats, particularly forests<sup>4</sup>. Our collective health, the health of our planet and that of our economies all rely on better protecting our forests. The interim report of the Dasgupta Review on the Economics of Biodiversity<sup>5</sup>, an independent assessment of the economic costs and risks of biodiversity loss globally, sets out how starkly our economic security relies on doing *more* to protect and restore nature and biodiversity, not less.

Recognising the impact of consumption in the UK on the world's forests, in 2019 we asked an independent Taskforce - the Global Resource Initiative (GRI) – to provide the Government with specific recommendations on how it could best help to address the

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<sup>1</sup> Seymour, F and Busch, J. (2016) [Why Forests? Why Now? The Science, Economics, and Politics of Tropical Forests and Climate Change](#)

<sup>2</sup> UN Environment Programme (2020) [The State of the World's Forests](#)

<sup>3</sup> UN Summit on Biodiversity (2020) [The Leaders' Pledge for Nature](#)

<sup>4</sup> Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), (2019) [The Global Assessment Report on Biodiversity and Ecosystem Services](#) <sup>4</sup> Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), (2019) [The Global Assessment Report on Biodiversity and Ecosystem Services](#)

<sup>5</sup> Dasgupta P. (2020) [The Dasgupta Review: Independent review on the economics of biodiversity](#). Interim Report.

problem. The GRI submitted its final report in March 2020<sup>6</sup>. It recommended the Government introduce a mandatory due diligence requirement on companies using ‘forest risk commodities’ – commodities that can cause wide-scale deforestation – in their supply chains.

Behind the GRI’s recommendation was a recognition that for over a decade, business and civil society have worked hard with governments and farmers in countries where these commodities are sourced to develop new standards and certification schemes. These initiatives have delivered important results. However, the Taskforce concluded that, unless these voluntary schemes were matched by action by governments in countries where a lot of these products are consumed, such as the UK, then they were unlikely to have the necessary impact. This is because the voluntary actions of responsible business will continue to be undermined by businesses who do not adopt good practice.

We launched this consultation to seek your views on whether the UK Government should introduce a new law designed to stop larger UK businesses from using commodities that were not produced in line with relevant laws in their country of origins, and requiring them to undertake due diligence on their supply chains and to publish the results. We also proposed that businesses failing to comply with these rules would be subject to fines.

The proposal was designed to balance the need to strengthen environmental protections, while also recognising the importance of supporting other countries’ legitimate concerns for economic development and poverty eradication. It also aimed to ensure that any future regulation is proportionate, and avoids placing an undue burden on small and medium sized businesses. It was based on the lessons we have learned from similar legislation relating to tackling the trade in illegal timber, which has provided the basis for building strong partnerships with governments in timber-producing countries on this issue.

This document sets out the questions we asked, the key themes that emerged from your responses, and whether there was overall agreement to proceed with the proposals.

## Consultation purpose

This consultation was designed to inform the Government’s thinking as it considered what action it should take in this area, including its response to the GRI’s recommendation to introduce a due diligence requirement. It sought views from a wide range of stakeholders in the UK and internationally on the principles guiding our approach and understand the impact on business and other interests.

The consultation asked questions on the following key themes:

- Whether the Government should introduce legislation

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<sup>6</sup> Global Resource Initiative. (2020), [Final Report](#)

- Whether it should be illegal for UK businesses to use forest risk commodities not produced in accordance with relevant laws in the countries they originate from
- Whether businesses should have a system of due diligence in place and the requirement to report on it
- Whether Government should be able to levy fines against businesses that do not comply with these requirements
- Who the legislation should apply to
- Whether this proposal could align with existing international reporting frameworks
- What commodities responding businesses use
- What systems responding businesses already have in place

The consultation also invited respondents to provide any additional information or comments on the proposal.

## Core proposal

The consultation document<sup>7</sup> laid out the detailed rationale behind the proposal and how it would work. In brief, it was designed to test support for the introduction of a new law that would:

- Make it illegal for businesses in scope to use, either in production or trade within the UK, forest risk commodities that have not been produced in accordance with relevant laws in the country where they are grown
  - ‘Forest risk commodities’ include those embedded within products
  - ‘Relevant laws’ include those that protect natural forests and other natural ecosystems from being converted into agricultural land
- Oblige businesses in scope to conduct due diligence to ensure that forest risk commodities that have not been legally produced do not enter their supply chain, and to report on this exercise publicly
- Enable the Government to levy fines and other civil sanctions against businesses that continue to use forest risk commodities that have not been produced legally and/or that do not have a robust system of due diligence in place
- Require that the Government regularly review the law’s effectiveness
- Apply to larger businesses, defined by their turnover and employee number threshold – small businesses would not be in scope

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<sup>7</sup>Defra. (2020), [Due diligence on forest risk commodities – Consultation document](#)

## Consultation process

The consultation on proposals for due diligence on forest risk commodities in the UK was open for 6 weeks from 25 August – 5 October 2020. Participants were given the following options for submitting their response:

- *Citizen Space*: an online questionnaire accessible from computers and mobile devices
- *Email responses*: participants could email their responses (and any queries) to our consultation email address
- *Postal responses*: participants could post their responses to the consultation coordinator at Defra

## Stakeholder engagement

Throughout the consultation period, we proactively engaged with a wide range of stakeholders in the UK and internationally. Our engagement aimed to provide stakeholders with an opportunity to ask questions about the rationale and scope of the proposed legislation and to get their views on how we could improve it further.

The main avenues of engagement included:

- Five regional seminars with business and NGOs covering UK, USA and Europe, South East Asia, Latin America and Africa. A total of 173 stakeholders attended the seminars
- Ministerial and official level meetings with other national governments
- Ministerial and official level meetings with business and NGO groups, including Retail Soy Group and Greener UK

The feedback received through this engagement has also informed our response to the consultation.

# Summary of responses

## Number of responses

In total 63,719 responses to the consultation were received. This was made up of:

- 1,147 responses through the online questionnaire on Citizen Space
- 62,572 responses via email, 62,506 of which were campaign responses (responding to three campaigns) and 65 of which were not. We received a total of eight late responses via email shortly after the consultation period closed. These have been included in our analysis as respondents attributed the delay to technical and/or COVID-19 related issues.
- 1 response received via post

In total, we received 62,506 campaign responses and 1,213 non-campaign responses.

Two of the campaigns established in response to the consultation directly addressed the consultation questions. These were launched by Global Witness (2,199 responses) and Traidcraft Exchange (1,079 responses). The third campaign through which we received 59,228 responses was led by WWF and did not address the consultation questions directly.

The WWF campaign submissions comprised of a short, standard email which urged Government to introduce legislation to remove deforestation and habitat conversion from products imported in the UK, and to do so urgently in the Environment Bill. The 59,228 responses received through this campaign have been analysed thematically, with numbers noted in relevant sections, because this enables trends within responses that directly addressed the consultation questions to be better understood.

The number of responses that addressed each question in Section D “About the Proposal” and the number of responses selecting “Yes”, “No”, and “Don’t know/Other” to the closed answer questions is outlined in Table 1.

**Table 1: Number of respondents who addressed each consultation question in Section D “About the Proposal” and how they responded to the closed answer questions**

Consultation Question	Total number of responses to this question	Number of responses selecting “Yes”	Number of responses selecting “No”	Number of responses selecting “Don’t Know”/ “Other”
Question 1	4,457	4,422	15	20
Question 2	4,458	4,397	33	28
Question 3	4,458	4,417	16	25
Question 4	4,458	4,387	32	39
Question 5	4,458	4,387	28	43
Question 6	4,457	579	95	3,783
Question 7	3,817	N/A	N/A	N/A
Question 8	2,637	N/A	N/A	N/A
Question 9	3,811	N/A	N/A	N/A

## Profile of respondents

Responses submitted through Citizen Space allow respondents to provide demographic information. Of the 1,147 responses received through Citizen Space, 926 (89%) were from individuals and 221 (21%) were from organisations. Non-campaign emails and postal responses also specified demographic information, with 60 (91%) being received from organisations and six (9%) from individuals. All campaign emails were considered to be from individuals, except one which specified it was sent on behalf of an organisation. Table 2 below provides the number of respondents by response type and demographic category.

**Table 2: Number of respondents by response type and category**

Profile of respondent	Number of Citizen Space responses	Number of email and postal responses	Number of campaign responses	Total
<b>Total</b>	<b>1147</b>	<b>66</b>	<b>62,506</b>	<b>63,719</b>
<b>Individuals</b>	926	6	62,505	63,437
<b>Government body</b>	8	6		14
<b>Non-governmental organisation</b>	94	23	1	118
<b>Small or micro business (fewer than 50 employees)</b>	28	1		29
<b>Medium business (50-249 employees)</b>	7	2		9
<b>Large business (250 or more employees)</b>	41	9		50
<b>Industry association</b>	20	15		35
<b>Another type of organisation</b>	23	4		27

Of the 2,271 respondents who specified which country they were from, 2,083 (92%) indicated they were from the United Kingdom. 188 respondents (8%) were between them based in almost fifty different countries. These included Malaysia, Indonesia, Ghana, Madagascar, Brazil, Peru, Ecuador, Argentina, Fiji, Japan, the United States, as well as numerous European countries.

Of the 14 responses received from government bodies, three (21%) were from UK public bodies and the remaining 11 (79%) were from eight other countries.

Of the 123 businesses and industry associations responding, 98 (80%) were UK-based and 25 (20%) were located in other countries.



Of the 118 non-governmental organisations that responded to the consultation, 63 (51%) are based in the UK while 50 (49%) indicated that they are based overseas. 5 did not specify where they are based.

Annex 1 provides a list of the organisations that responded to the consultation.

## Approach to analysis

The following summary provides an overview of the consultation responses received. While this summary cannot describe every response, all views have been considered in detail and will continue to inform on-going policy development.

Because the consultation included both closed answer questions and open answer questions, and because some responses addressed the consultation questions directly and others did not, our analysis combines a question-specific approach and a thematic approach.

We received 4,491 responses that addressed the consultation questions and 59,228 that did not. As outlined in Table 1, not all 4,491 responses that addressed the consultation questions provided replies for each consultation question. A small number of them (30), received via email, were not structured to respond to the specific consultation questions, but they did address most of the themes explored in the consultation.

Unless otherwise specified, headline figures relate to the total number of responses that addressed the relevant consultation questions and its themes. Campaign responses that responded directly to the consultation questions (those received through the Global Witness and Traidcraft Exchange campaigns) have been included in question specific analyses. In a small number of explicit instances, figures are expressed as a percentage of non-campaign responses because this enables themes amongst independent responses to be better understood.

Unless otherwise specified, the questions referred to in the analysis are those from the consultation's Section D "About the Proposal". Qualitative responses to the consultation's open answer questions (Question 7 and 8) are summarised thematically. Responses to the consultation's final question (Question 9: "Do you have any further information or comments you would like us to be aware of?") have been reflected in relevant sections on qualitative views.

The 59,228 responses that did not address the consultation questions were received through a WWF campaign and were comprised of a short standard text. The points made within the WWF campaign – that the Government ought to legislate to help address deforestation and do so urgently through the Environment Bill – are therefore reflected in wider thematic analysis and highlighted in relevant sections on qualitative views.

## Analysis

### **Views on introducing legislation and making it illegal for businesses to use commodities not produced in line with relevant laws (questions 1 and 2)**

#### *Summary*

The overall the weight of the responses were in favour of introducing legislation, and of using legislation to make it illegal for businesses to use forest risk commodities not produced in accordance with relevant laws. This support was received by individuals and organisations alike, including businesses, government bodies, and non-governmental organisations from both the UK and overseas, with many stressing the urgency of the issue at hand.

#### **Question 1: Should the Government introduce legislation designed to make forest risk commodities more sustainable?**

##### *Total responses*

63,714 respondents shared views on whether the Government should introduce legislation designed to make forest risk commodities more sustainable.

4,457 responded directly to the closed answer Question 1, of whom 3,782 also shared qualitative views on the proposal.

59,228 qualitative views were provided through the WWF campaign expressed strong support for the Government to introduce legislation to make forest risk commodities more sustainable, but did not provide detailed views other aspects of the proposal.

An additional 29 respondents provided detailed qualitative views on the proposal independent of the WWF campaign and without directly responding to Question 1.

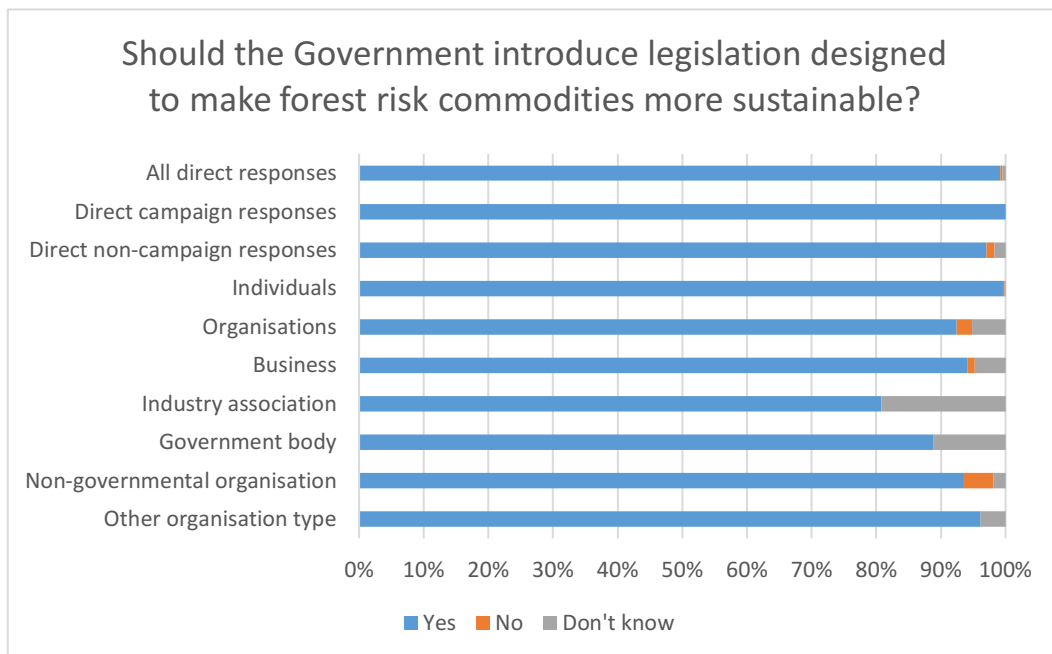
A total of 63,039 respondents therefore provided qualitative views relevant to Question 1. 59,228 were identical and received through the WWF campaign, and 3,811 were more detailed. Of the 3,811 more detailed responses, 3,278 were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

A breakdown of the direct responses to Question 1 is provided below. The qualitative views received are summarised alongside those that relate to Question 2 as they are closely connected.

### Direct responses to Question 1

4,457 respondents provided a direct answer to Question 1. 4,422 (99%) agreed that Government should introduce legislation to make forest risk commodities more sustainable. 15 (0.3%) respondents disagreed, while 20 (0.5%) indicated that they don't know.

Figure 1 shows the breakdown of answers to Question 1, broken down by category.



**Figure 1: Percentage of responses indicating “Yes”, “No”, and “Don’t know” to Question 1 by category.**

3,277 direct answers to Question 1 were campaign responses, and 1,180 were non-campaign responses. Of the campaign responses, 3,277 (100%) selected “Yes”. Of the non-campaign responses, 1,145 (97%) selected “Yes”, 15 (1.3%) selected “No”, and 20 (1.7%) selected “Don’t know”.

4,206 responses were from individuals, with 4190 (99%) of them agreeing, nine (0.2%) disagreeing, and seven (0.2%) selecting “Don’t know”. 251 organisations responded to Question 1, 232 (92%) of which indicated “Yes”, six (3%) said “No”, and 13 (5%) selected “Don’t know”.

Of the 84 businesses that responded to the question, 47 of which were large businesses, only one (1%) disagreed with introducing legislation to make forest risk commodities more sustainable. 79 (94%) agreed that the Government should introduce legislation, and four (5%) selected “Don’t know”. 21 (81%) of the 26 industry associations responding expressed their support, with the remaining 5 (20%) selecting “Don’t know”.

Nine government bodies, one of which is a public body based in the UK, shared their views on whether the Government should introduce legislation. Eight (89%) of them agreed and one (11%) selected “Don’t know”.

Of the 106 non-governmental organisations responding, 99 (93%) selected “Yes”, five (5%) indicated “No”, and two (2%) “Don’t know”.

Qualitative views that relate to Question 1, including the 59,228 from the WWF campaign strongly supporting the introduction of legislation, are summarised alongside those that relate to Question 2 as they are closely connected.

## **Question 2: Should it be illegal for businesses to use forest risk commodities in the UK that have not been produced in accordance with relevant laws?**

### *Total responses*

4,487 respondents shared views on whether it should be illegal for businesses to use forest risk commodities in the UK that have not been produced in accordance with relevant laws.

4,458 responded directly to the closed answer Question 2, of whom 3,782 also shared qualitative views on the proposal. An additional 29 respondents provided qualitative views on the proposal without directly responding to Question 2.

The 59,228 responses received through the WWF campaign did not address whether it should be illegal for businesses to use forest risk commodities in the UK that have not been produced in accordance with relevant laws.

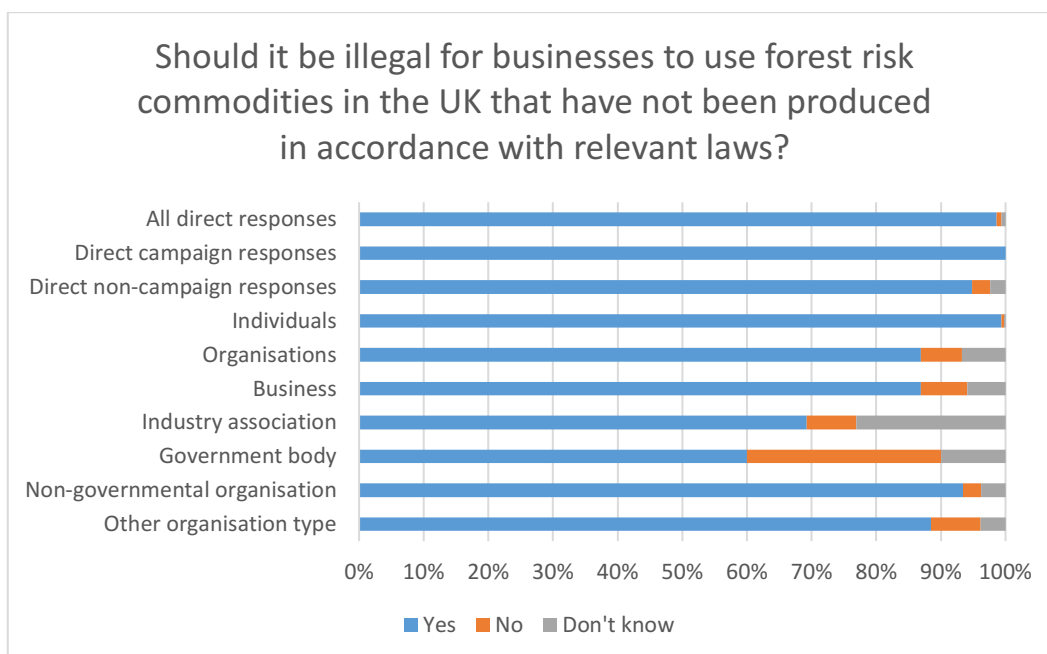
A total of 3,811 respondents therefore provided qualitative views relevant to Question 2. 3,278 of these were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

A breakdown of the direct responses to Question 2 is provided below. The qualitative views received are summarised alongside those that relate to Question 1 as they are closely connected.

### *Direct responses to Question 2*

4,458 respondents provided a direct answer to Question 2. Of that, 4,397 (99%) agreed that it should be illegal for businesses to use forest risk commodities in the UK if they have not been produced in accordance with relevant laws. 33 (0.7%) respondents disagreed, while 28 (0.6%) indicated that they don’t know.

The responses to Question 2 are represented by category in Figure 2.



**Figure 2: Percentage of responses indicating “Yes”, “No”, and “Don’t know” to Question 2 by category.**

3,277 direct answers to Question 2 were campaign responses, and 1,181 were non-campaign responses. Of the campaign responses, 3,277 (100%) selected “Yes”. Of the non-campaign responses, 1,120 (95%) selected “Yes”, 33 (3%) selected “No”, and 28 (2%) selected “Don’t know”.

4206 responses were from individuals, with 4178 (99%) of them agreeing, 17 (0.4%) disagreeing, and 11 (0.3%) selecting “Don’t know”. 252 organisations responded to Question 2, 219 (87%) of which indicated “Yes”, 16 (6%) said “No”, and 17 (7%) selected “Don’t know”.

Of the 84 businesses that responded to the question, 47 of which were large businesses, 73 (87%) agreed that it should be illegal to use forest risk commodities in the UK that have not been produced in accordance with relevant laws. Six (7%) businesses selected “No” while five (6%) indicated “Don’t know”. 18 (69%) of the 26 industry associations responding expressed their support. Two (8%) industry associations disagreed, and six (23%) indicated that they “Don’t know”.

Ten government bodies, one of which is a public body based in the UK, shared their views on whether the government should introduce a prohibition, and six (60%) of them agreed. Three (30%) government bodies – representing two foreign governments – selected “No” and 1 (10%) marked “Don’t know”.

Of the 106 non-governmental organisations responding, 99 (93%) selected “Yes”, three (3%) indicated “No”, and four (4%) “Don’t know”.

## Qualitative views relevant to question 1 and 2

A total of 63,033 qualitative views were received that were relevant to Question 1. Of these, 59,228 were identical and received through the WWF campaign. 3,811 more detailed views were received via the survey, email, post, and the Traidcraft and Global Witness campaigns. These 3,811 qualitative views comprise all those relevant to Question 2, as the WWF campaign responses did not address Question 2. Of the 3,811 respondents providing detailed qualitative views relevant to Question 1 and 2, 3,278 were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

These qualitative views largely reflect the support indicated in direct responses to Question 1 and 2 to introduce legislation and make it illegal to use commodities in the UK that have not been produced in accordance with relevant laws.

One individual for example said “*I believe that this is an extremely important proposal. I would like to see it that all countries have legislation of this kind*”. An open letter to the Secretary of State from the Retail Soy Group on behalf of 22 major businesses in the food sector, including J Sainsbury, Nestlé, and McDonald’s UK and Ireland, stated:

*The Government’s proposal to introduce a due diligence requirement on business is welcome as we recognise that the private sector has a critical role in addressing global deforestation. We are fully supportive of the government’s intention to develop a coordinated strategy to set a level playing field where sustainable commodities are the norm throughout the UK and beyond.*

The WWF campaign, which generated 59,228 responses, called urgently on the Government to introduce measures through the Environment Bill to remove deforestation and habitat conversion from products imported to the UK. In addition to the WWF campaign’s emphasis on the urgency to act, 63% of the 3,811 responses providing detailed qualitative views on the proposal emphasised the need to act rapidly in this area. The 2,199 responses received through the Global Witness campaign, along with a number of other non-campaign responses, stated that the proposed law needs to take effect by 2023 in order to demonstrate leadership and have impact.

In addition, many provided detailed thoughts on why legislative measures alone cannot achieve sufficient impact, emphasised how the proposal should be taken forward to maximise impact, and highlighted ways in which the proposal could be more ambitious.

Of those providing detailed qualitative views, 3,444 (90%) respondents stressed that the proposal could go further. 3,247(85%) specified that its environmental focus needs to go hand in hand with consideration of human rights issues. 2,458 (64%) respondents specifically referred to indigenous rights.

869 (23%) outlined that relevant local laws may not be as strong as international or industry standards; 677 (17%) encouraged government to expand the proposal to other ecosystems and environmental impacts; and 61 (2%) explicitly called for the proposal to go beyond legality and include environmental sustainability requirements.

Non-governmental organisations, in particular, outlined that the proposal, albeit welcomed, ought to form part of a wider approach to tackling environmental and social issues through both legislative and other measures. Some business respondents, including large businesses, echoed this. One large business for example, welcomed “*the inclusion of a strong and effective mandatory due diligence obligation in the Environment Bill,*” but stressed that it should form “*one part of a package of measures by which the Government can take action on deforestation/conversion and on reducing its global environmental footprint*”.

The 2,199 submissions received through the Global Witness campaign, and a number of other non-campaign respondents, drew on the Global Resource Initiative’s recommendation that the Government should apply similar principles to the finance industry. Responses from the Global Witness campaign and others highlighted that the law will lack efficiency if it does not also apply to those financing deforestation, and that not including the finance sector could undermine the UK’s efforts to be a global leader on green finance.

25 submissions on behalf of organisations explicitly emphasised the need for the government to review the legislation at sufficiently regular intervals. This included the open letter from the Retail Soy Group signed by 22 large businesses, which stressed the importance of “*a time-bound, transparent statutory review process on its effectiveness.*” A number of non-governmental organisations and businesses shared similar lines, with five saying:

*It is critical that this obligation include a time-bound statutory review process on its effectiveness. The process should include a specified timeframe and requirements (including an assessment of the effectiveness of the measure) and be fully transparent (e.g. the government should prepare a report into the review which must be laid in Parliament).*

103 (19% of non-campaign responses) expressed concern over the strength of measures in local laws to tackle deforestation and some highlighted that the proposal could lead to deregulation in countries where forest risk commodities are sourced.

A range of additional themes arose from other groups of respondents. 342 (9%), detailed qualitative views, for example, referred to the need to consider interaction with other legislation and/or other countries and regions. 35 responses (3% of non-campaign responses) highlighted the need for clarity on what “relevant local laws” includes, which commodities would be in scope, and other aspects of the proposal.

Although only 11 overseas public bodies responded to the consultation itself, representing governments and ministries from six other countries, wider stakeholder engagement during the consultation period allowed for the views of other national governments to be taken into consideration. Through ministerial and official level meetings with national governments carried out alongside the public consultation, participating national governments expressed general support for a legality-based approach because of the ways it enables them to determine outcomes through local laws. In meetings and their consultation responses, other national governments and public bodies highlighted that even introducing legislation to prohibit UK companies from using forest risk commodities that have not been produced in accordance with relevant laws will create costs for the countries where these products originate and the farmers that produce them. Strong concerns were expressed regarding approaches that extend beyond legality, which they outlined would lead to more significant barriers to trade and costs to farmers.



## Views on introducing a due diligence requirement (questions 3, 4 and 5)

### *Summary*

Across the responses to Questions 3, 4, and 5 and the qualitative submissions received, respondents were widely in favour of the Government introducing a due diligence system for forest risk commodities in the UK, with public reporting requirements and the option for the government to levy fines. Individuals and organisations, including businesses, government bodies, and non-governmental organisations from the UK and abroad expressed their support.

Qualitative responses provided more in-depth insights as to how a due diligence system ought to be implemented and enforced, outlined the challenges associated with due diligence across complex supply chains, and shared views on alternative and additional mechanisms.

### **Question 3: Should businesses in the UK be obliged to have a system of due diligence in place to ensure that the forest risk commodities they use have been produced in accordance with relevant laws?**

#### *Total responses*

4,487 respondents shared views on whether businesses in the UK should be obliged to have a due diligence system in place to ensure that the forest risk commodities they use have been produced in accordance with relevant laws.

4,458 responded directly to the closed answer Question 3, of whom 3,782 also shared qualitative views on the proposal. An additional 29 respondents provided qualitative views on the proposal without directly responding to Question 3.

The 59,228 responses received through the WWF campaign did not address whether businesses in the UK should be obliged to have a due diligence system in place to ensure that forest risk commodities have been produced in accordance in relevant laws.

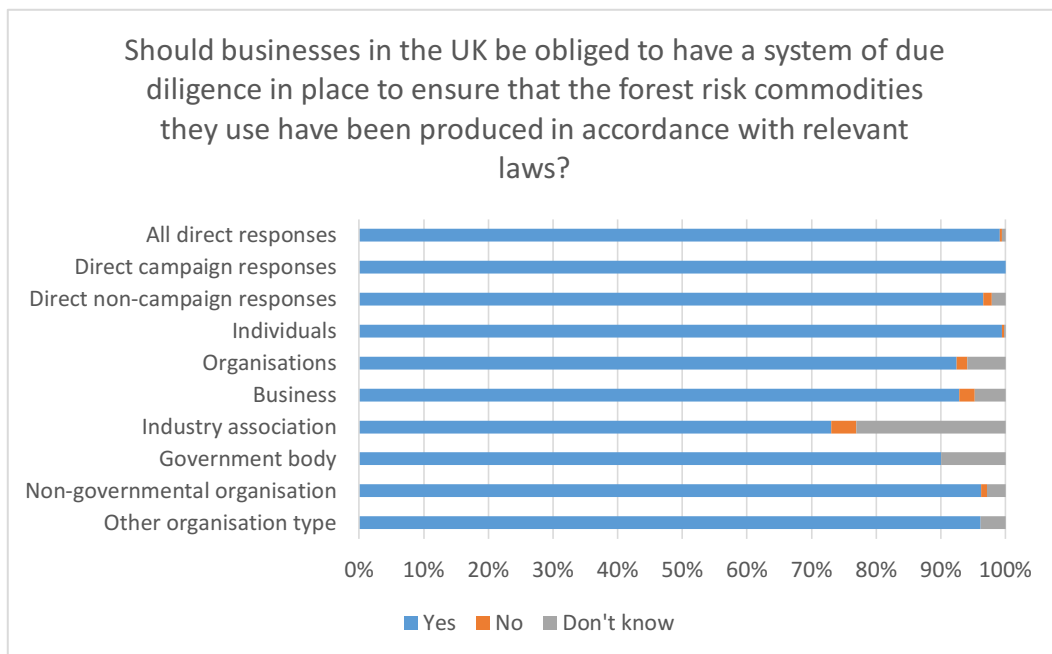
A total of 3,811 respondents therefore provided qualitative views relevant to Question 3. 3,278 of these were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

A breakdown of the direct responses to Question 3 is provided below. The qualitative views received are summarised alongside those that relate to Question 4 and 5 as they are closely connected.

### Direct responses to Question 3

4,458 respondents provided a direct answer to Question 3. 4,417 (99%) agreed that businesses in the UK should be subject to a forest risk commodity due diligence requirement. 16 (0.4%) respondents disagreed, while 25 (0.6%) indicated that they don't know.

The responses to Question 3 are represented by category in Figure 3.



**Figure 3: Percentage of responses indicating “Yes”, “No”, and “Don’t know” to Question 3 by category.**

3,277 direct answers to Question 3 were campaign responses, and 1,181 were non-campaign responses. Of the campaign responses, 3,277 (100%) selected “Yes”. Of the non-campaign responses, 1,140 (97%) selected “Yes”, 16 (1%) selected “No”, and 25 (2%) selected “Don’t know”.

4,206 responses were from individuals, with 4,184 (99%) of them agreeing, 12 (0.3%) disagreeing, and ten (0.2%) selecting “Don’t know”. 252 organisations responded to Question 3, 233 (92%) of which indicated “Yes”, four (2%) said “No”, and 15 (6%) selected “Don’t know”.

Of the 84 businesses that responded to the question, 47 of which were large businesses, only two (2%) disagreed with introducing a due diligence requirement for forest risk commodities. 78 (93%) agreed that the government should introduce a due diligence requirement, and four (5%) selected “Don’t know”. 19 (73%) of the 26 industry

associations responding supported the introduction of a due diligence requirement. One (4%) industry association disagreed, and six (23%) indicated that they “Don’t know”.

Ten government bodies, one of which is a public body based in the UK, shared their views on whether UK businesses should be required to have a due diligence system for forest risk commodities. Nine (90%) of them agreed. One (10%) government body selected “Don’t know”.

Of the 106 non-governmental organisations responding, 102 (96%) selected “Yes”, one (1%) indicated “No”, and three (3%) “Don’t know”.

## **Question 4: Should businesses be required to report publicly on their system of due diligence?**

### *Total responses*

4,487 respondents shared views on whether businesses should be required to report publicly on their system of due diligence.

4,458 responded directly to the closed answer Question 4, of whom 3,782 also shared qualitative views on the proposal. An additional 29 respondents provided qualitative views on the proposal without directly responding to Question 4.

The 59,228 responses received through the WWF campaign did not address whether businesses should be required to report publicly on their system of due diligence.

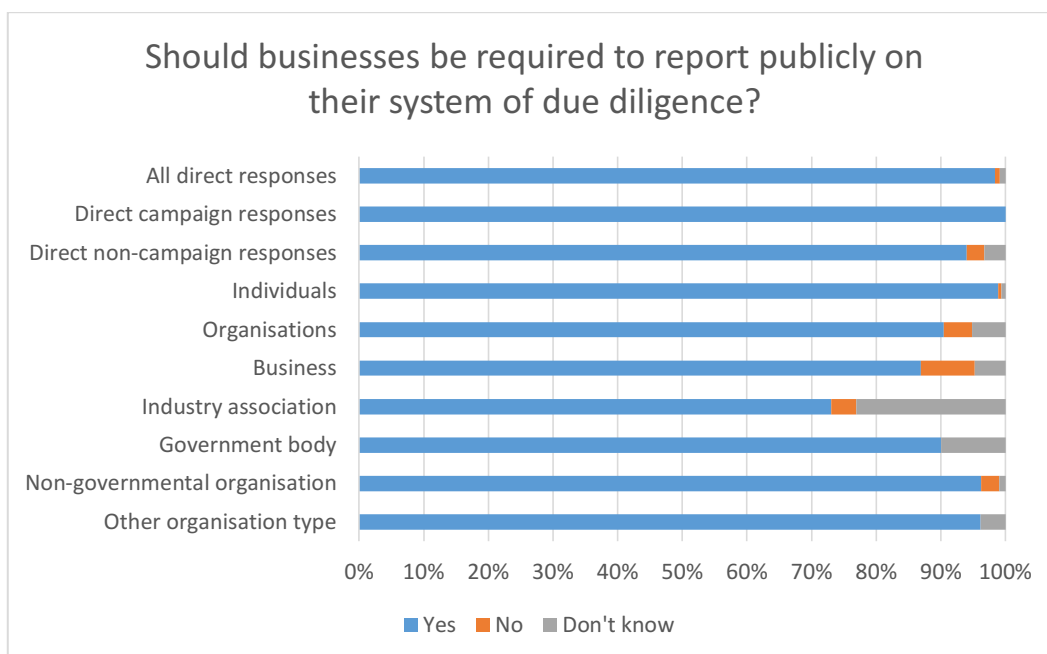
A total of 3,811 respondents therefore provided qualitative views relevant to Question 4. 3,278 of these were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

A breakdown of the direct responses to Question 4 is provided below. The qualitative views received are summarised alongside those that relate to Question 3 and 5 as they are closely connected.

### *Direct responses to Question 4*

4,458 respondents provided a direct answer to Question 4. 4,387 (98%) agreed that businesses in the UK should be required to report publicly on their due diligence system. 32 (0.7%) respondents disagreed, while 39 (0.9%) indicated that they don’t know.

The responses to Question 4 are represented by category in Figure 4.



**Figure 4: Percentage of responses indicating “Yes”, “No”, and “Don’t know” to Question 4 by category.**

3,277 direct answers to Question 4 were campaign responses, and 1,181 were non-campaign responses. Of the campaign responses, 3,277 (100%) selected “Yes”. Of the non-campaign responses, 1,110 (94%) selected “Yes”, 32 (3%) selected “No”, and 39 (3%) selected “Don’t know”.

4,206 responses were from individuals, with 4,159 (99%) of them agreeing, 21 (0.5%) disagreeing, and 26 (0.6%) selecting “Don’t know”. 252 organisations responded to Question 4, 228 (90%) of which indicated “Yes”, 11 (4%) said “No”, and 13 (5%) selected “Don’t know”.

Of the 84 businesses that responded to the question, 47 of which were large businesses, 73 (87%) agreed that businesses should be required to report publicly on their due diligence system. Seven (8%) businesses selected “No” while four (5%) indicated “Don’t know”. 19 (73%) of the 26 industry associations responding expressed their support. One (4%) industry association disagreed, and six (23%) indicated that they “Don’t know”.

Ten government bodies, one of which is a public body based in the UK, shared their views on whether businesses should be required to report on their due diligence system, and nine (90%) of them agreed. One (10%) government body selected “Don’t know”.

Of the 106 non-governmental organisations responding, 102 (96%) selected “Yes”, three (3%) indicated “No”, and one (1%) “Don’t know”.

## **Question 5: Should the Government be able to levy fines against businesses that use forest risk commodities not produced in accordance with relevant laws?**

### *Total responses*

4,487 respondents shared views on whether the Government should be able to levy fines against businesses that use forest risk commodities not produced in accordance with relevant laws.

4,458 responded directly to the closed answer Question 5, of whom 3,782 also shared qualitative views on the proposal. An additional 29 respondents provided qualitative views on the proposal without directly responding to Question 5.

The 59,228 responses received through the WWF campaign did not address whether the Government should be able to levy fines against businesses using forest risk commodities not produced in accordance with relevant laws.

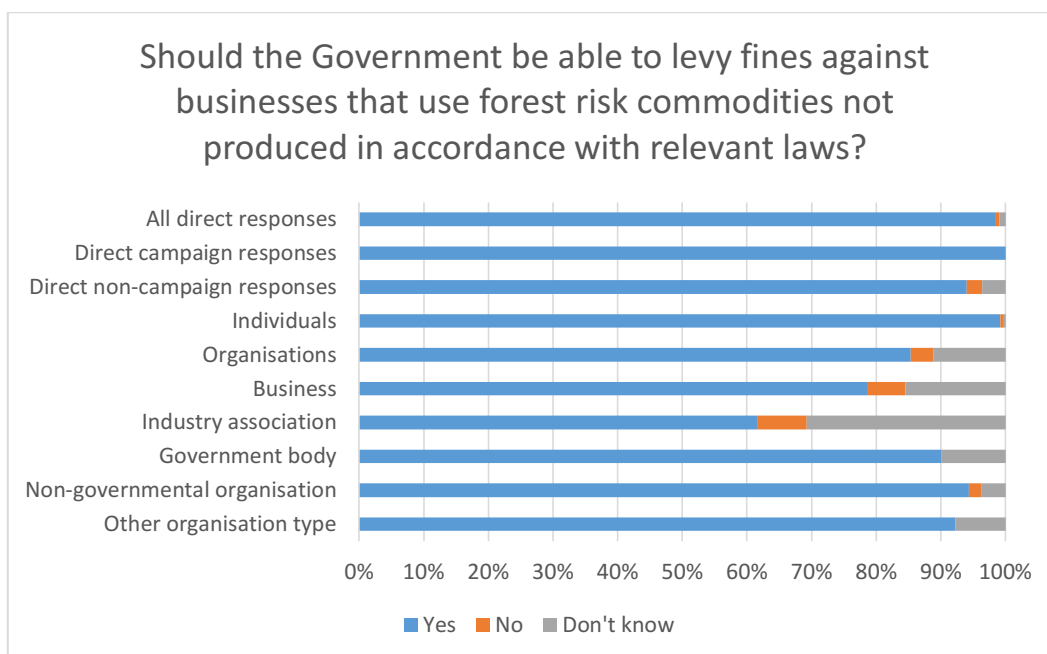
A total of 3,811 respondents therefore provided qualitative views relevant to Question 5. 3,278 of these were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

A breakdown of the direct responses to Question 5 is provided below. The qualitative views received are summarised alongside those that relate to Question 3 and 4 as they are closely connected.

### *Direct responses to Question 5*

4,458 respondents provided a direct answer to Question 5. 4,387 (98%) agreed that the government should be able to levy fines where businesses use forest risk commodities not produced legally. 28 (0.6%) respondents disagreed, while 43 (1%) indicated that they don't know.

The responses to Question 5 are represented by category in Figure 5.



**Figure 5: Percentage of responses indicating “Yes”, “No”, and “Don’t know” to Question 5 by category.**

3,277 direct answers to Question 5 were campaign responses, and 1,181 were non-campaign responses. Of the campaign responses, 3,277 (100%) selected “Yes”. Of the non-campaign responses, 1,110 (94%) selected “Yes”, 28 (2%) selected “No”, and 43 (4%) selected “Don’t know”.

4,206 responses were from individuals, with 4,172 (99%) of them agreeing, 19 (0.5%) disagreeing, and 15 (0.4%) selecting “Don’t know”. 256 organisations responded to Question 5, 219 (85%) of which indicated “Yes”, nine (4%) said “No”, and 28 (11%) selected “Don’t know”.

Of the 84 businesses that responded to the question, 47 of which were large businesses, 66 (78%) expressed their support for the government to levy fines. Only five (6%) disagreed, while 13 (15%) selected “Don’t know”. 16 (61%) of the 26 industry associations responding also supported fines. Two (8%) industry associations disagreed, and eight (31%) indicated that they “Don’t know”.

Ten government bodies, one of which is a public body based in the UK, shared their views on whether the government should be able to levy fines, and nine (90%) of them agreed. One (10%) government body selected “Don’t know”.

Of the 106 non-governmental organisations responding, 100 (94%) selected “Yes”, two (2%) indicated “No”, and four (4%) “Don’t know”.

## Qualitative views relevant to questions 3, 4 and 5

A total of 3,811 qualitative views were received that were relevant to Questions 3, 4, and 5. 3,278 of these were received through the Global Witness and Traidcraft Exchange campaigns, and 533 were independent, non-campaign responses.

The WWF campaign responses did not address whether the Government should introduce a due diligence system, although it did highlight the need to introduce world-leading measures to remove deforestation and habitat conversion from the products imported into the UK.

The support expressed through direct responses to Questions 3, 4, and 5 to introduce a due diligence system for businesses using forest risk commodities in the UK was reflected across the 3,811 qualitative views provided. The qualitative views welcoming the due diligence proposal emphasised the critical role that a regulatory mechanism can play to support existing certifications and voluntary standards.

One non-governmental organisation said *“Without greater due diligence conducted by demand markets, [...] countries are vulnerable to over exploitation and illegal exploitation of natural resources by companies, with devastating effects on wildlife, the people who live in forest areas and national economies.”*

101 responses (3%) stressed the need for good enforcement for a due diligence system on forest risk commodities to have its intended effect. The majority of these (87) were not campaign related. Some responses went on to suggest how to ensure good enforcement and recommended using an independent body with expertise in the area, providing guidance to regulators to focus their enforcement efforts and investing in tools and technology to support enforcement. One respondent said *“Laws are only as strong as their enforcement. It is vital that any new legislation be accompanied by detailed instructions on how the new laws will be enforced.”*

2,250 respondents (59%) providing qualitative views specified that fines needed to be sufficiently high to deter poor practices. One organisation said *“fines must be effective and dissuasive - that is capable of being levied at a sufficiently high level to dissuade future breach.”*

2,304 respondents (60%) also suggested that the requirements could be applied differently to businesses of different size, turnover, or impact, for example through proportionate fines. One organisation suggested *“fines must be sufficiently large, and proportional to expected profits from in-scope commodities, to ensure compliance. This is essential to avoid companies treating fines as taxes.”* The 2,199 responses received through the Global Witness campaign, as well as a small number of non-campaign responses, stated that penalties should include criminal sanctions in addition to civil sanctions.

Businesses, in both survey responses and emails, outlined strong support for a due diligence system, including reporting requirements and the option for government to levy fines. A smaller number of business respondents, however, highlighted the ways in which a due diligence system on forest risk commodities presents challenges to business. Of the 86 businesses that replied, 14 (16%) outlined possible challenges, which predominantly related to cost, traceability, and evidence requirements. One said, *“The nature of commodities includes products changing hands and being co-mingled at multiple points through the supply chain to the extent that traceability to origin by downstream operators is significantly challenging.”* 32 respondents (3% of non-campaign responses) stressed that support would be needed for businesses, citing financial provisions and guidance as examples.

50 respondents (9% of non-campaign responses) also referred to the need to support countries where forest risk commodities originate given the requirements that a due diligence system may place on them, referencing examples such as payments for ecosystem services. The responses calling for support for these countries reflected a wider theme amid submissions that stressed the need to work with the countries and local communities that produce forest risk commodities in order to effectively address environmental and social issues.

Stressing the need to work closely with local communities was expressed hand-in-hand with the suggestions, summarised under the qualitative views relevant to question 1 and 2, that a legality-focused approach needs to be embedded within a wider set of measures. Indeed, many responses from non-governmental organisations, businesses, other organisations, and individuals from the UK and abroad welcomed the proposal for a due diligence system while calling for additional systems. One non-governmental organisation said, *“Although welcome, the due diligence legislation will likely not be sufficient alone to have a significant impact on removing deforestation from UK supply chains. A broad of suite of additional measures to tackle illegal deforestation will be needed.”* Moreover, 51 responses (9% of non-campaign responses) proposed specific additional and/or alternative mechanisms, 30 of which named labelling/consumer education.

Beyond the closed answer responses to Question 4 on public reporting, many comments provided support for and detail on due diligence reporting requirements, saying they will enable transparency and allow for public scrutiny. One organisation suggested that *“the Government should produce a template of information which businesses are required to report on, as part of their due diligence process”*. Another organisation said that companies should be required to *“publicly report (in a similar way to the Modern Slavery Act 2015) on how they are managing the risk of deforestation in their supply chains”*. Some respondents also highlighted the opportunity and need to align the proposal with human rights reporting requirements, with many of them naming the Modern Slavery Act.

Other national governments and overseas public bodies provided views both through the consultation and through ministerial and official level meetings during the consultation period. While many supported the introduction of a due diligence requirement based on



legality, some shared concerns over the burdens that a due diligence system could place on the countries and farmers producing commodities that could come in scope. Several presented a preference for a system that recognises existing certifications and standards to simplify the process for business.

## Views on who the proposal should apply to (question 6 and 7)

### *Summary*

Most respondents stressed that the proposal should apply to all businesses, not just large businesses. Many emphasises that the proposal ought to apply differently to different businesses and some suggested a phased approach. There were detailed arguments as to why company size and in particular employee number may not reflect the impact that businesses have on forests. Some made the case that Government should consider a threshold based on volume of commodity to determine which businesses are in scope.

### **Question 6: Should the legislation apply to larger businesses, over an employee number and turnover threshold, that use forest risk commodities in production or trade?**

#### *Total responses*

4,469 respondents shared views on whether the legislation should apply to larger businesses, over an employee number and turnover threshold, that use forest risk commodities in production or trade.

4,457 responded directly to the closed answer Question 6, of whom 3,805 went on to provide qualitative views on who the proposal should apply to in response to the open answer Question 7. An additional 12 respondents provided qualitative views under Question 7 without directly responding to Question 6.

The 59,228 responses received through the WWF campaign did not address whether the legislation should apply to larger businesses, over an employee number and turnover threshold.

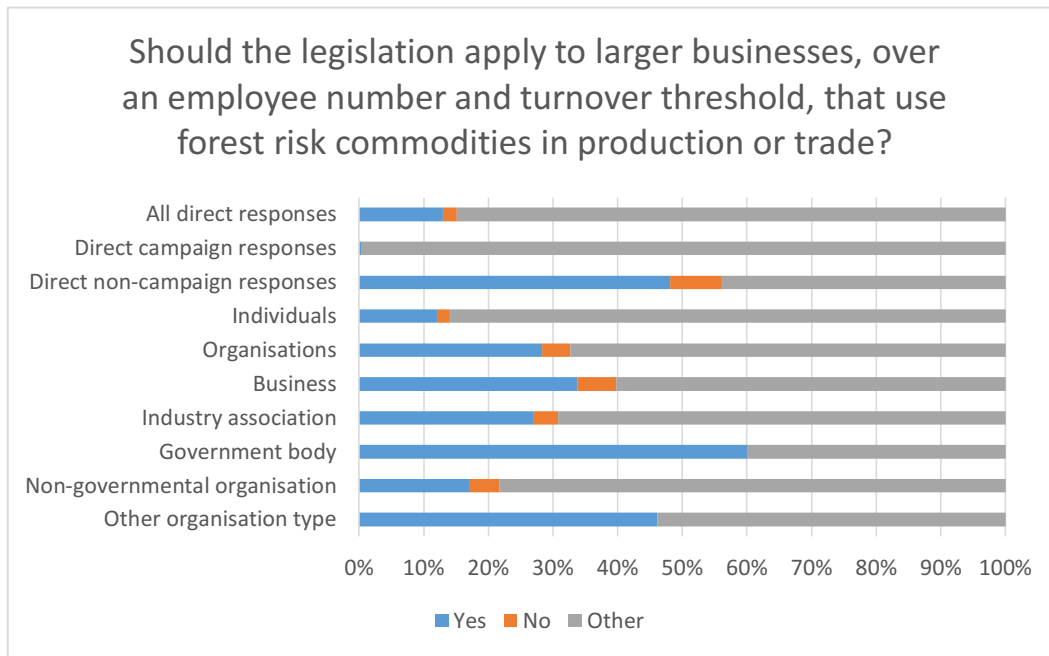
A total of 3,817 respondents therefore provided qualitative views on who the proposal should apply to. 3,278 of these were received through the Global Witness and Traidcraft Exchange campaigns, and 539 were independent, non-campaign responses.

A breakdown of the direct responses to Question 6 is provided below. The qualitative views are summarised within the section on Question 7.

#### *Direct responses to Question 6*

4,457 respondents provided a direct answer to Question 6. 579 (13%) agreed that the legislation should apply to larger businesses over an employee and turnover threshold. 95 respondents (2%) disagreed, while 3,783 (85%) selected "Other" and outlined their position in response to Question 7.

The responses to Question 6 are represented by category in Figure 6.



**Figure 6: Percentage of responses indicating “Yes”, “No”, and “Other” to Question 6 by category.**

3,277 direct answers to Question 6 were campaign responses, and 1,180 were non-campaign responses. Of the campaign responses, 11 (0.3%) selected “Yes”, one (0.03%) selected “No”, and 3,265 indicated “Other”, going on to explain in Question 7 that the proposal ought to apply to all businesses. Of the non-campaign responses, 568 (48%) selected “Yes”, 94 (8%) “No”, and 518 (44%) “Other”.

4,206 responses were from individuals, with 508 (12%) of them agreeing to Question 6, 84 (2%) disagreeing, and 3,614 (86%) selecting “Other”. 251 organisations responded to Question 6, 71 (28%) of which indicated “Yes”, 11 (5%) said “No”, and 169 (67%) selected “Other”.

Of the 83 businesses that responded to the question, 47 of which were large businesses, 28 (34%) expressed their support for the legislation to apply to larger businesses over an employee number and turnover threshold. Five (6%) businesses selected “No” while 50 (60%) indicated “Other”. Seven (27%) of the 26 industry associations responding expressed their support. One (4%) industry association disagreed, and 18 (69%) opted for “Other”.

Ten government bodies, one of which is a public body based in the UK, shared their views on whether the legislation should apply to larger businesses above an employee and turnover threshold. Six (60%) of them agreed, while four (40%) government bodies selected “Other”.

Of the 106 non-governmental organisations responding, 18 (17%) selected “Yes”, five (5%) said “No”, and 83 (78%) indicated “Other”.

## Question 7: If you responded ‘Other’ to Question 6, please expand.

With a majority of respondents selecting “Other” to Question 6, key themes across responses to Question 7 outline views on who the proposal should apply to and how. 3,817 respondents addressed this question, some of whom had selected “Yes” or “No” to Question 6 but took the opportunity to detail their views further. 3,278 were received through the Global Witness and Traidcraft Exchange campaigns, and 539 were independent, non-campaign responses.

3,667 (96%) of the 3,817 responses addressing Question 7 stressed that the proposal should apply to all businesses, not just large businesses. 2,304 (60%) did emphasise, however, that the proposal ought to apply differently to different businesses. 89 responses (17% of non-campaign responses) highlighted that using company size as the threshold to determine businesses in scope would not enable the intended impact, with 59 of those specifying employee size and 53 specifying turnover size as an ineffective measure. Key reasons given for employee number and turnover size being ineffective measures included the fact that they do not necessarily reflect the quantity of a commodity used or traded, notably where low cost commodities are in circulation and automated processes have replaced manual labour. One respondent said:

*Using both employee numbers and turnover could potentially exclude some very large business concerns [sic] and/or encourage businesses to reduce employee numbers in order to remove legal/reporting obligations.” An organisation said, “If the scope is limited to larger businesses, it will also create a loophole, which could be circumvented by businesses setting up smaller sister companies.” Another organisation said, “A company with a high turnover and number of staff for example might import only a small amount of rubber, whereas a smaller company, producing tyres for example, could import a much higher volume.*

Building on this feedback, 58 detailed responses (11% of non-campaign responses) predominantly from businesses, industry associations, and non-governmental organisations outlined a case for setting a threshold to determine businesses in scope based on volume of commodity used or traded in the UK. These respondents argued that basing the threshold for the requirements on volume of commodity would better reflect the impact that businesses have on forest across their supply chains. One business said,

*We support the requirement for a threshold, however we argue that as opposed to a threshold related on turnover, a metric that would better reflect the influence of a specific company would be a threshold on the volume of materials used.*

Another business outlined that “*The greater the commodity volume sourced by a particular company, the greater that company has with their ‘sphere of influence’ and impact on their respective supply chains.*”

A further 52 respondents (9% of non-campaign responses) highlighted other possible measures to determine the threshold of in-scope businesses, with most of these citing a risk based approach, and some outlining a value based approach.

27 respondents (5% of non-campaign responses) explicitly suggested a phased approach, for example, by applying to larger businesses now but expanding to others in time. 34 (6% of non-campaign responses) proposed applying the requirements to all uses of forest risk commodities in the UK, not just business use and trade. 31 responses (6% of non-campaign responses) asked for clarity on what “larger” businesses includes.

## **Views on opportunities to align the proposal with businesses’ reporting under existing international frameworks (question 8)**

### *Summary*

The majority of respondents stated that there are not opportunities to align the proposal with international reporting frameworks or disagreed to aligning with any of them. These responses stressed the need for due diligence reporting requirements precisely because existing reporting frameworks do not go far enough or achieve their necessary impact. Those that did identify opportunities to align due diligence reporting with existing frameworks referred to the Task Force on Climate-related Financial Disclosures, the Accountability Framework, and the OECD’s Multinational Enterprise Guidelines. Some highlighted the opportunity and need to align the proposal with international and domestic human rights reporting requirements, naming the Modern Slavery Act.

### **Question 8: Large businesses have existing obligations to report on climate and environment issues including in relation to net zero. To what extent are there opportunities to align the proposal set out in this consultation with businesses’ reporting under existing international frameworks [for example, the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD)]?**

Fewer respondents addressed the open answer Question 8 compared to the previous seven questions. 2,199 were received through the Global Witness campaign, and 438 were independent, non-campaign responses. 243 (9%) of the 2,637 responses that commented on opportunities for alignment agreed that there are options to align the proposal with existing international reporting frameworks. 33 (1%) of these responses provided technical views on where there were opportunities for alignment and how this could operate. Most of these specified support for alignment with the recommendations of the Task Force on Climate-related Financial Disclosures, but also mentioned a range of other frameworks. These included the Accountability Framework Initiative, the OECD’s

Multinational Enterprise Guidelines, and Streamlined Energy and Carbon Reporting. 51 respondents (12% of non-campaign responses) highlighted the opportunity and need to align the proposal with international and domestic human rights reporting requirements, in many instances naming the Modern Slavery Act.

2,227 (84%) of the 2,637 responses expressing views on Question 8 did not identify opportunities to align the proposal with international reporting frameworks, or disagreed to it being aligned with any of them. The main reasons provided for this were that existing frameworks have gaps, are voluntary, and/or are not abided by. One individual said:

*Existing obligations are not doing enough to prevent businesses participating in supply chains which increase deforestation. A large number of companies have made commitments to eliminate deforestation from their supply chains, but these commitments have not yet been met or in any way look like they will be met. As we have seen in other areas of environmental governance, such as the Aichi Targets, unless there are enforceable obligations, environmental commitments are likely to be side-lined. The ever-increasing rates of deforestation and ongoing links to global supply chains - including UK businesses - demonstrate that existing frameworks are insufficient and should not be relied upon.*

Others outlined issues with the scope and structure of existing reporting frameworks. These responses stressed the need for due diligence reporting requirements precisely because existing reporting frameworks do not go far enough or achieve their necessary impacts.

## **Understanding how responding businesses use commodities and manage their supply chains**

In Section C “About Your Business” of the consultation, business and industry association respondents were asked to outline which forest risk commodities they use. They were also asked to describe what systems they already have in place to understand their production and ensure that they are produced legally and/or in accordance with other standards. All responses in this section directly responded to the relevant consultation questions.

### *Summary*

The responses to Section C Questions 9 to 14 provided important detail on current systems in place to understand how forest risk commodities are produced across supply chains and ensure legality and other standards are upheld. Respondents indicated that they used palm oil, soya, cocoa, beef, and other forest risk commodities in the UK. Of the systems in place to understand supply chains and ensure legality described by respondents, most comprised of multiple elements, including supply chain data collection and/or mapping, the use of certifications and accreditations, and audits. Some respondents indicated that they have systems in place to improve environmental

sustainability and human rights across their supply chains. These responses will continue to be considered in depth to better understand existing systems.

## **Use of forest risk commodities**

Of the 112 that responded, 34 businesses and industry associations indicated that they use palm oil in the UK, 29 use soya, 20 use cocoa, 16 use beef, 11 use leather, and 7 use rubber. 38 respondents selected none of the above or did not provide information on the forest risk commodities that they use. 35 responding businesses and industry associations indicated that they use or trade other forest risk commodities in the UK including 23 references to timber and timber products (including pulp and paper), 9 to coffee, and 7 to sugar.

## **Existing systems in place to ensure forest risk commodities are produced legally**

Of the 112 businesses and industry associations that responded, 27 indicated that they currently have a system in place to ensure that palm oil has been produced legally, 19 have a system for soya, 16 for cocoa, and 13 for beef. 32 respondents selected none of the above, and others did not respond. 49 businesses and industry associations indicated that they have a system in place to ensure the legal production of other forest risk commodities used or traded in the UK. These responses included 29 references to timber and timber products, 4 to coffee, and 2 to sugar.

A total of 57 responses provided relevant details on their current systems to ensure the forest risk commodities that they use or trade in the UK have been produced legally (Section C Question 13). Most responses outlined systems comprising of several elements or methods, with ten (18%) responses specifically saying they have a due diligence system in place. 18 respondents (32%) highlighted collecting supply chain data and/or mapping their supply chain. These responses included references to enabling technologies such as satellite monitoring.

30 responses (53%) referred to the use of certifications and/or accreditations to ensure legality. These included the Roundtable on Sustainable Palm Oil (RSPO), the Forest Stewardship Council (FSC), and schemes such as Cocoa Horizons and Bonsucro for cane sugar. Other responses highlighted the use of an audit system, ensuring traceability in their supply chains, and transparency systems to ensure legality.

A number of responses referred to their systems in place to meet the EU Timber Regulations (EUTR), soon to be UK Timber Regulations (UKTR) in the UK, which prohibits the placing on the market of illegally harvested timber. Some of these responses highlighted the ways in which due diligence for forest risk commodities should build on EU/UK timber regulations but ought not to overlap with it.

## **Further information on systems to understand how forest risk commodities are produced**

There were 44 responses to Section C Question 14: “Please use this box to share any further information about the systems you use to better understand how forest risk commodities in your supply chains are produced”. The responding businesses shared views on systems in place that focus on elements other than, or go beyond, legal production. 11 (25%) referred to systems to improve environmental sustainability and seven (16%) to systems to uphold human rights. A small number outlined company-specific commitments, including to zero net deforestation in company owned and operated facilities.

16 responses (36%) stressed the importance of interaction with their suppliers, with smaller numbers of respondents referring to interaction with non-governmental organisations and government officials in producer countries.

16 responses (36%) mentioned supply chain mapping, 11 responses (25%) mentioned traceability (including chain of custody and tagging technologies) and 7 responses (13%) said they were members of industry and/or non-governmental initiatives. As for Section C Question 13, some responses (11%) referred to existing certification schemes.



# Government response

## **We will introduce an amendment to the Environment Bill enabling us to place new responsibilities on larger businesses using forest risk commodities in their supply chains.**

Based on the overwhelmingly positive response we received to relevant consultation questions, as well as the in-depth work of the Global Resource Initiative on this issue, we intend to progress with our policy proposals and introduce a mandatory due diligence requirement on companies using forest risk commodities.

Recognising the urgency of the issue we will shortly lay a Government amendment to the Environment Bill, enabling us to set the framework of our proposal in primary legislation. The Bill is currently in Commons committee stage of legislative passage and the proposals fall into the Bill's scope. As such, it is the best vehicle to advance the proposal into legislation as soon as possible. The due diligence requirement will complement existing measures in the Bill to protect and enhance domestic biodiversity, sitting alongside wider measures to create a new and ambitious framework for environmental governance.

## **We will maintain an approach based on legality**

While the vast majority of respondents were in favour of legislating on this issue, a significant number of respondents from civil society, and some from businesses indicated that we should go further. Many suggested that the Government should set environmental and human rights requirements that go beyond what is set out in law where the commodity is produced. Some responses also expressed concern over the strength of local laws, and the potential for deregulation.

We have considered these views carefully. We have decided to maintain the focus on legality. This is for three main reasons.

First, we remain convinced that working with and through national governments and supporting communities who live and work in highly forested areas, remains the best path to sustainability. Feedback through the formal consultation and wider stakeholder engagement with the countries where forest risk commodities are produced suggests that this approach is the best way of balancing concern for environmental standards and respecting the right of countries to determine their own policies on land use and climate change.

The proposed legislation will provide a pathway to recognise national standards and certification schemes, which will create a framework for on-going dialogue on environmental standards and legislation with nations that produce forest risk commodities.

The second main reason for maintaining the focus on legality is the lack of a workable alternative. No single definition of what constitutes sustainable production is suitable for use in all countries, for all forest risk commodities, and for all agricultural production systems. Arguably, we could define standards for each commodity based on criteria set out in international certifications. However, there are a range of certifications available for some commodities, each of which changes on a regular basis, and no certifications are available for other commodities. No single standard for commodity production has been agreed between governments internationally, meaning that to set any particular standard as mandatory could be seen as an imposition on democratically elected governments.

Thirdly, it would be extremely difficult for businesses and Government to verify that sustainability criteria have been met in production overseas, particularly where they vary from commodity-to-commodity and area-to-area. Legality provides a common floor that all produce must meet, which is democratic, and which is adapted to the local context.

## **Addressing human rights risks in all kinds of business activity**

A number of respondents made the case for including human rights in the scope of the legislation, highlighting the association between human rights abuses and deforestation.

However, tackling human rights abuses requires an approach tailored for that purpose – rather than through the narrow lens of a sub-set of commodities chosen for their impact on forests.

The Government supports the United Nations Guiding Principles on Business and Human Rights, an internationally agreed framework for addressing human rights risks in all kinds of business activity. These principles encourage businesses to adopt due diligence approaches and to address any negative impacts where appropriate. The UK was the first state to produce a national action plan for the Guiding Principles, and we have recently announced measures to strengthen the approach of the UK's Modern Slavery Act, as part of that plan.

We recognise the role indigenous people can play in protecting forests and that a number of countries have national laws that require changes in land use to be supported through free, prior and informed consent (FPIC) of local communities. These laws would be in scope of the proposed regulation.

## **We have refined how we will decide which companies are in scope**

Most responses indicated that the proposal should apply to all businesses, not just larger businesses. Many of these respondents also highlighted the benefits of a phased

approach beginning with a subset of companies and expanding to include more companies over time.

We proposed focussing this regulation on larger businesses because supply chains are typically dominated by a small number of influential global companies who are most able to send a signal to producers. We remain of the view that this is the right approach because there is a high level of market concentration in this sector, with a small number of larger businesses occupying key points in the supply chain. What this means practically is that the product moving through these supply chains is highly likely to be subject to due diligence along that supply chain. Our aim is to maximise coverage in terms of the volume of these products that is used in the UK, while also reducing the burden on small and medium sized businesses.

Numerous comments from respondents also highlighted that an employee number threshold would not effectively reflect the scale of influence of an individual business. Respondents noted that businesses with few employees can still use large quantities of commodities, often where automated processes feature in supply chains, and create significant risks of deforestation. We have therefore decided to remove the use of an employee number threshold to define businesses in scope. We will maintain the focus on turnover.

A number of detailed responses suggested that an alternative would be to set a threshold based on the volume of commodity used. However, defining companies in scope on volume alone would be difficult to enforce because the regulator would not have sufficient data available to identify which companies it is responsible for policing. We consider turnover to be a reasonable proxy for volume used, and will further test this in advance of laying secondary legislation, which is where the precise turnover thresholds will be defined.

Finally, we recognise that there is limited value in requiring larger companies who use only very small quantities of forest risk commodities (for example, in refreshments served at meetings) are not subject to the requirement. We have taken this feedback on board by seeking the power to set a *de minimis* threshold. This means that businesses who would otherwise be in scope can notify Government that they are exempt if they handle volumes of a commodity below a certain threshold, which would be set in secondary legislation.

For the avoidance of doubt, because existing regulations are in place, companies using timber and timber products will not be in scope of our proposal. Our proposals already broadly align with the due diligence process set out in the EU Timber Regulations, and where appropriate we will continue to ensure there is read across between these two systems.

## **We will aim to maximise alignment of reporting associated with this regulation and other reporting requirements**

Over 50 respondents highlighted the opportunity and need to align the proposal with international and domestic human rights reporting requirements, with many naming the Modern Slavery Act. To help streamline reporting requirements we will align our reporting period and deadline with that of the Modern Slavery Act's transparency in supply chains requirement. This means that, in line with the adjustments the Government announced Modern Slavery Act, businesses will have six months to report after the end of the UK financial year.

A number of respondents highlighted the GRI recommendation that *"the financial sector should also be covered by a similar mandatory due diligence obligation, requiring them to exercise due diligence in order to avoid their lending and investments funding deforestation"*.<sup>8</sup>

While there is a need to tackle the finance industry's impact on forests, we need a system tailored to their unique circumstance and position in the global marketplace: Our proposal would not be the most appropriate model for this sector because its effectiveness is underpinned by a prohibition, which would make it illegal for businesses to use forest risk commodities not produced in line with local laws. Without this prohibition, which was widely supported in the consultation, there is little incentive for business to conduct due diligence to a high standard. Demonstrating a breach of the prohibition requires businesses to be relatively close in the value chain to the commodity, for instance by handling the physical commodity.

However, we do see significant scope to ensure that the data provided by businesses in scope of the regulation can be used by the financial services industry and other interested parties, including civil society, to inform investment decisions. The lack of consistent reporting means this is currently a data gap and closing it will enable similar principles to be applied to the finance industry in future, as recommended by the GRI. Data disclosures will also help to strengthen environmental, social, governance (ESG) assessments that are used to inform investment decisions, and facilitate participation in other voluntary financial frameworks such as the Task Force on Climate-related Financial Disclosures and the Task Force on Nature-related Financial Disclosures.

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<sup>8</sup> Global Resource Initiative. (2020), [Final Report](#)

## **We will consult further when we prepare the secondary legislation that would be needed to operationalise this law**

Many of the questions that we received from respondents sought clarity on aspects of the proposal that will be developed in secondary legislation. As stated in the original consultation document, any secondary legislation would be subject to a formal consultation and further engagement with key stakeholders. This will consider which commodities will be prescribed, which businesses are subject to the requirements, and the precise information businesses will be required to report on. No final decision has been made as to the timeframe for laying secondary legislation, but any such legislation would necessarily build in an appropriate period for business to prepare.

While the details will be set out in secondary legislation, a range of business and industry association consultation responses outlined the advantages of starting with a select list of forest risk commodities and expanding to others in time. These responses indicated that such a phased approach would enable due diligence systems to be put in place rapidly for those commodities with higher risks of deforestation in their supply chains and more established monitoring protocols. Further commodities could then be brought into scope. Subject to further consultation, ongoing policy development, and stakeholder engagement, we will consider which commodities to include in the first round of any secondary legislation, with the intent of including more over time as part of a phased approach.

Specifics on the law's enforcement will also be outlined in secondary legislation. 101 consultation responses highlighted that good enforcement is critical to achieving the intended outcome of the proposal. We will name and fund a regulator that will be responsible for investigating compliance, and the Secretary of State will have the ability to impose fines based on their investigations. The Secretary of State will have a range of civil sanctions available to them in addition to fines to ensure companies comply with the law.

## **We will regularly review the effectiveness of the law**

Several detailed consultation responses highlighted the importance of regularly reviewing how the proposed legislation is operating once in place. We are conscious of the regularity with which environmental provisions must be reviewed in the current climate, and are including a review clause in primary legislation that requires the Government to review the law's effectiveness every two years and furthermore to set out any steps it intends to take as a result of this review before Parliament. This review is reinforced across the Environment Bill through a secondary provision in Clause 20, in which the UK government commits to review environmental protections in place internationally every two years. The requirement to review our environmental legislation so regularly is a fundamental part of our wider commitment to addressing critical environmental challenges in a changing world,

and to working collaboratively with global partners to achieve outcomes that are good for the planet and for people.

## **Due diligence legislation is only one part of a bigger package of measures we are taking to tackle this problem**

We know that a due diligence requirement based on legality needs to be a part of a wider package of measures, and that it is not enough for the UK alone to act. Alongside this document, we are publishing the Government's response to all of the recommendations of the Global Resource Initiative (GRI), which lays out a comprehensive package of demand- and supply-side measures that the UK Government is taking in this area.

We recognise the importance of scaling support to farmers to enable them to accelerate the transition to more sustainable production. In September 2019, the Prime Minister announced a doubling of the UK's International Climate Finance (ICF) to £11.6 billion. A significant percentage of this will be used to support the transition to low-carbon agriculture.

As part of our Presidency of COP26, we will also be working to build an international alliance of countries to agree how they can work together to ensure that farmers receive fair prices and economies supported to recover, while also enhancing environmental standards.

# Annex 1 – Responding organisations

This annex provides a list of the organisations that responded to our consultation in alphabetical order.

3Keel LLP	BankTrack
ABAG - Brazilian Agribusiness Association	Be The Earth Foundation
ABColumbia	BIAZA
ADM Agriculture	Bloomberg LP
Agricultural Industries Confederation (AIC)	BlueBay Asset Management
Agroisolab UK Limited	BMO Global Asset Management
Alliance for Water Stewardship-AWS	Book Chain Project
Amazon Environmental Research Institute – IPAM	Born Free Foundation
Amazon Watch	Brazilian science and civil society platforms and organisations (23 signatories)
Amnesty International	Brazilian Sugarcane Industry Association (UNICA)
Animal Equality	British Meat Processors Association
Anti-Slavery International	British Retail Consortium
Asda	British Tyre Manufacturers' Association
Associação Agroecológica Tijupá (Brazil)	Burung Indonesia
Associação Brasileira das Indústrias de Óleos Vegetais – ABIOVE (Brazilian Association of Vegetable Oil Industries)	Carbonxgen
Associação Comunitária de Educação em Saúde e Agricultura (Brazil)	Cargill
Aviva Investors	Catholic Agency for Overseas Development (CAFOD)
Bakkavor plc	CDC Group
	CDP
	Chatham House

Chemical Industries Association	DMSI or IPOB (Indonesian Palm Oil Board)
Chester Zoo	
Chilled Food Association	Domini Impact Investments LLC
Church Commissioners for England	Earth Innovation Institute
Citizens Reserve, Inc.	Earth PBC
CitrusBR	Earthsight
ClientEarth	Earthworm Foundation
Cockburn Lucas IFC Ltd	Ecometrica Ltd.
Comissão Pastoral da Terra (Land Pastoral Commission), CPT Marabá and Xinguara teams	EcoNexus
Comitê Nacional em Defesa dos Territórios Frente a Mineração - CNDTM	Eco Sutton
Compass UK & Ireland	Elephant Protection Initiative Foundation
Competere Ltd	Environmental Defense Fund
Conservation International	Environmental Governance Institute (EGI)
CORE Coalition	Environmental Investigation Agency (EIA)
Corporación de Apoyo a Comunidades Populares - CODACOP	EOS and international business of Federated Hermes
Cosmetic, Toiletry & Perfumery Association (CTPA)	European Cocoa Association
Cranswick Plc	European Palm Oil Alliance (EPOA)
Croda International Plc	European Tyre and Rubber Manufacturers' Association (ETRMA)
Cumbria & Cumberland WI	Extinction Rebellion
DAABON UK Ltd	FAIRR Initiative
Dairy UK	Fairtrade Foundation
Devro Plc	Fauna & Flora International
	Federation of Bakers (FOB)



Feedback Global	Global Generation
Fern	Global Green Growth Institute
Friends of the Earth England, Wales, and Northern Ireland	Global Vision Direct Ltd
FODER	Global Witness
foldAI	Government of Brazil
Food and Land Use Coalition	Government of Colombia
Forest and Communities Platform (Cameroon)	Government of Haiti
Forest Ecology and Conservation Network, Imperial College London	Grassington Farm Ltd
Forest Peoples Programme	Greenpeace
Forest Trends (UK)	Group of Producing Countries of the Southern Cone
Forest Trends (USA)	Hilton Food Group
Forêts et Développement Rural (FODER)	Human Rights Watch
ForFarmers UK Limited	IDH, the Sustainable Trade Initiative
Fosters Bakery	Indonesian Biodiversity Trust Fund (Yayasan KEHATI)
FSC UK	Indonesian Civil Society Communications Forum (FKMS) for Fair and Sustainable Palm Oil Governance
Fundación Ambiente y Recursos Naturales (FARN)	Indonesian Pulp and Paper Association
Fundacion Ecumenica Para El Desarrollo Y La Paz - Fedepaz	Indústria Brasileira de Árvores (Brazilian Tree Industry Association)
Fundación Vida Silvestre Argentina	Inspired Energy
Gaiachain	Institute for Climate and Society
GAPKI (Indonesian Palm Oil Association)	Institute of Chartered Accountants in England and Wales (ICAEW)
Global Canopy	Institute of the Amazon People and Environment
Global Forest Coalition	

Instituto Centro de Vida - ICV	Ministry of Plantation Industries and Commodities (Malaysia)
Instituto Cerrados	
InvestAssure Ltd	Ministry of Production, Foreign Trade, Investments and Fishery (Ecuador)
Invision Technology UK Ltd	Moonstone Games Limited
IUCN NL	National Edible Oils Distributors Association (NEODA)
J Sainsbury's plc	National Farmers' Union
John Lewis Partnership	National Pig Association
Justiça nos Trilhos	National Wildlife Federation
Karen Crawford Limited	NatWest Group Plc
Kingfisher plc	Need Consulting
Labour Behind the Label	NEEDS
Leather UK	Nestlé
Local Authority Pension Fund Forum (LAPFF)	Nordea Asset Management
Lush Manufacturing Ltd	Northfield Environmental Forum
Kepak Group	Observatoire Ivoirien pour la gestion durable des Ressources Naturelles (OI-REN)
MapHubs Incorporated	
Marks & Spencer	Olam
Mars UK	Olenex Sarl
Metsä Wood UK	Optel Group
Mighty Earth	Orangutan Land Trust
Ministry of Agriculture and Irrigation (Peru)	Organisation for Economic Cooperation and Development Secretariat
Ministry of Agriculture and Livestock (Ecuador)	Organisation of African, Caribbean and Pacific States (OACPS)
Ministry of Foreign Affairs and Human Mobility (Ecuador)	P1 Investment Management Ltd

Pacific Islands Forum Secretariat (PIFS)	Retail Soy Group (22 business signatories from across the food sector)
Palladium International Ltd	RightsDD Limited
Paper Cup Alliance	Robeco
Parents for Future Berlin Germany	Roundtable on Responsible Soy Association (RTRS)
Peach Pubs	Roundtable on Sustainable Palm Oil (RSPO)
PEFC UK Ltd	Royal Botanic Gardens, Kew
PepsiCo	Royal Botanic Gardens, Key (Scientists and Science Policy team)
PEQUI - Pesquisa e Conservação do Cerrado	Royal Society for the Protection of Birds (RSPB)
Pilgrim's Pride Ltd	RSK
Premier Foods	Say It With Wood
Princes Limited	Scotland's International Development Alliance
Principles for Responsible Investment (PRI)	Secure Forests CIC Limited
Procter & Gamble	Seed Crushers and Oil Processors Association, SCOPA
Project HEARD	Servicio Nacional Forestal y de Fauna Silvestre – SERFOR (Peru)
Proforest	SGS
ProTerra	ShareAction
PT. Corinthian Industries Indonesia	Sinergia Animal
Rainforest Alliance	Size of Wales
Rainforest Foundation Norway	Sociedade Brasileira de Herpetologia
Rainforest Relief	Sodexo
Raízen	Soil Association
RB (Reckitt Benckiser Group)	
Regenerative Food and Farming	
RePattern.org	

Solidaridad	The National Coppice Federation
Source Climate Change Coffee	The Nature Conservancy
Soya UK Ltd	The Rubber Association of Indonesia (GAPKINDO)
Stockholm Environment Institute	The Satellite Applications Catapult
Sumatran Orangutan Society	The Servite Friars
Sustain: The Alliance for Better Food and Farming	Tony's Chocolonely
Sustainable Wood	Tradelink Wood Products Ltd
Sylvera Limited	Traidcraft Exchange
Synchronicity Earth	Tribes Alive
Tesco Plc	Tropenbos International
The Accountability Initiative Framework (AFI)	Tropical Forest Alliance-Colombia
The Alliance for Beverage Cartons and the Environment (ACE UK).	UK Doorstep Choice
The Ashden Trust	UKRI GCRF Trade, Development and the Environment Hub
The Body Shop International on behalf of Natura &Co	Uni-Com (Global) Ltd.
The Bureau of Investigative Journalism (TBIJ)	Unilever
The Co-operative Group (The Co-op)	Union Hand Roasted Coffee
The Earth Project 2050 Ltd	University of Sussex
The Food and Drink Federation	Walgreens Boots Alliance
The Food Foundation	Water Witness International
The Global Initiative to End Wildlife Crime (hosted by the ADM Capital Foundation)	West Kent Federation of Women's Institute
The International Meat Trade Association	Westminster Foundation for Democracy (WFD)
	Weston Importers Ltd (part of Marfrig Global Foods)
	Whitbread PLC

Wildlife Conservation Society (WCS)

Women for the Environment

World Animal Protection UK

World Resources Institute

Water Integrity Network

WWF Colombia

WWF Germany

WWF Indonesia

WWF Brazil

WWF UK

WWF US

Zoological Society of London