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UNDER THE RADAR

How cattle ranchers caught
employing slave labor are part
of the supply chains of Brazil's
largest meatpacking companies

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CONTENTS

4

Introduction

7

What is Slave Labor in Brazil?

16

*How does this Cattle ends up
in Meatpacking Plants?*

20

Case Studies

39

*Perspectives
and Recommendations*

45

*Annex:
What the Meatpackers Say*

INTRODUCTION

In 2024, Brazil produced 10.9 million tonnes of beef, a record amount in the historical series kept by the National Supply Company (CONAB).¹ Being the world's largest exporter, the country has ranked second among global producers for at least a decade now – only behind the United States.²

Brazil exported 2.8 million tonnes of meat in 2024,³ of which 88% were unprocessed. In the coming years, the Brazilian Association of Meat Exporting Industries (*Associação Brasileira das Indústrias Exportadoras de Carnes*, ABIEC) projects growth that would meet an equally growing global demand.

But there is a dark side to this record production and trade of meat and its byproducts such as leather and beef tallow. Workers subjected to slavery-like conditions, illegal deforestation, and invasion of Indigenous lands are issues that intertwine throughout Brazil's livestock supply chain.

From 1995 to 2024, 17,300 workers were subjected to slavery-like conditions in the industry, according to data from Brazil's Ministry of Labor and Employment (*Ministério do Trabalho e Emprego*, MTE) compiled by **Repórter Brasil**. Throughout this time series, the livestock industry accounted for 26% of the number of victims of slave labor in Brazil.

Pressure from agricultural activities such as cattle ranching is associated with over 97% of all loss of native vegetation in the country from 2019 to 2024.⁴ In the Amazon, deforesting land for pastures accounts for 90% of the biome's deforestation.⁵ Between 1985 and 2023, pastureland in the Amazon jumped from 12.7 million hectares to 59 million hectares.⁶ In total, Brazil is estimated to have 160 million hectares of pastures.⁷

Operations carried out by Brazilian environmental and law enforcement agencies show that livestock farming also occupies protected areas, such as Indigenous lands.⁸ Cattle ranching by non-Indigenous people in these territories is banned by the Brazilian Constitution, which guarantees their exclusive use to Brazil's native populations.⁹ Journalistic investigations



also reveal that livestock farming that invades traditional territories is responsible for increased deforestation in these areas¹⁰ and increases violence in many areas.¹¹

Several publications by **Repórter Brasil** and other organizations have already shown that cattle ranchers with a history of socio-environmental irregularities are part of large meatpackers' supply chains.¹² But how does this happen?

After birth, animals go through the stages of breeding, rearing – which begins after weaning – and fattening. In many cases, these stages involve several ranchers. But only those who send animals from their farms to slaughter – direct suppliers – are fully mapped and monitored by meatpacking companies.

Ranchers involved in socio-environmental irregularities often transfer their cattle for final fattening to “clean” properties – that is, farms authorized to sell animals to slaughterhouses. They operate under the radar, and companies are still unable to track all of their direct suppliers.

In addition to these gaps, irregularities in the properties' registration in the Rural Environmental Register (*Cadastro Ambiental Rural*, CAR) and the lack of public policies for tracking cattle also lead to marketing of animals tainted by cases of slave labor, deforestation, and invasion of public lands.

Growing international demand for meat and slaughter byproducts that are free from socio-environmental irregularities has put pressure on the industry for greater transparency. As a consequence, meatpacking companies themselves have signed sectoral agreements and commitments to produce with zero deforestation. Actual results, however, still fall far short of the promises.

In this new investigation conducted in partnership with Climate Rights International, **Repórter Brasil** identified ten cattle ranchers with a history of social and environmental irregularities—eight of whom were held responsible for employing slavery-like labor—who are part of the supply chains of the country's largest meat processing companies.

An analysis of animal transit records from 2018 to 2025 found that these ranchers' cattle were transferred to farms that supply meatpacking plants or sent directly for slaughter at companies such as JBS, Minerva, Marfrig, and Frigol – the four largest in the country,¹³ and other regional companies such as Masterboi, Rio Maria, Pantanal, and Frigosaj.

For this investigation, in addition to an extensive survey and data cross-referencing, **Repórter Brasil** and Climate Rights International visited the municipality of São Félix do Xingu, in Pará state, which has the highest number of cattle head and cases of slave labor in the sector.¹⁴ The state has the largest cattle population in the Amazon and the second largest in Brazil.¹⁵

The cases illustrate some of the main gaps when it comes to tracking and blocking suppliers with a history of irregularities.





WHAT IS SLAVE LABOR IN BRAZIL?

The concept of labor in slavery-like conditions is described in Article 149 of Brazil's Criminal Code, which states that it is a crime "to reduce a person to a condition analogous to slavery by subjecting them to forced labor, exhaustive working hours or degrading working conditions or by restricting, by any means, their movement due to debt owed to the employer or agent."¹⁶

The occurrence of any of these four elements is enough to characterize that crime, which does not depend on the victim's statement or accusation.¹⁷ The sentence, from two to eight years in prison, is increased by half if the victim is a child or adolescent or if the crime is based on prejudice related to race, colour, ethnicity, religion, or origin.¹⁸



In some of the cases identified in the investigation, victims of slave labor did not have access to potable drinking water

SLAVE LABOUR:

What does Brazilian law say?

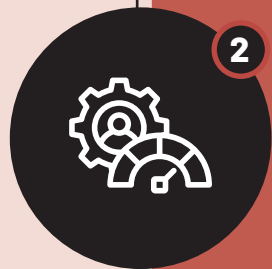
The crime of “reducing someone to a condition analogous to slavery” is described in Article 149 of Brazil’s Criminal Code. Any of the following four elements is sufficient to characterize the crime:



1

FORCED LABOR

Any activity performed compulsorily, against the worker’s will. The employment relationship may be maintained through physical violence, threats, coercion, deception, document withholding or other fraudulent means.



2

EXHAUSTING WORKING HOURS

Long daily working hours that exhaust the worker to the point of not allowing physical and mental recovery between the end of one workday and the beginning of the next, leading to exhaustion and putting the worker’s physical integrity at risk.



3

DEGRADING WORKING CONDITIONS

When the work environment violates human dignity, with precarious accommodation, poor hygiene, inadequate food, or lack of access to potable water, exposing the worker to physical risks.



4

DEBT BONDAGE

Creation of indebtedness mechanisms to prevent a worker from terminating the employment relationship and leaving the workplace. These debts are often illegal.

Source: Ministry of Labor and Employment,
Normative Instruction No. 2, November 2021

The broader concept of forced labor adopted internationally is described in ILO (International Labor Organization) Convention 29 of 1930. According to the convention, forced labor is “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”¹⁹

Experts stress that the concept of slave labor adopted in Brazil is innovative because, in addition to coercive forms characteristic of forced labor, it includes such as debt bondage and restricted movement, situations of poor living and working conditions.

“The Brazilian definition thus seeks to embrace a variety of concepts: forced labor, slavery-like practices, debt bondage, abusive recruitment and degrading working conditions that do not necessarily emanate from coercion,” explains researcher Roger Plant, an expert in modern-day slavery and former ILO consultant, in a study.²⁰

From 1995 to 2024, 65,600 workers were subjected to slavery-like conditions in the country, according to data from the Ministry of Labor and Employment (MTE) compiled by **Repórter Brasil**.

EXPERTS STRESS THAT THE CONCEPT OF SLAVE LABOR ADOPTED IN BRAZIL IS INNOVATIVE BECAUSE IT INCLUDES, IN ADDITION TO COERCIVE FORMS CHARACTERISTIC OF FORCED LABOR, SUCH AS DEBT BONDAGE AND RESTRICTED MOVEMENT, SITUATIONS OF POOR LIVING AND WORKING CONDITIONS.

The problem, however, is underreported. The number of slave labor cases found could be even higher if the state structure – such as the number of inspectors – kept pace with the demand for inspections, experts point out.²¹ Between 2012 and 2024, the number of labor inspectors fell by 34.1%.²²

Accountability

Operations to combat slave labor in Brazil are led primarily by inspectors from the Ministry of Labor and Employment (MTE).²³ When employers are caught in the act using slave labor, inspectors halt activities and remove the victims from the premises. At this point, the employer must formalize the employment relationship and pay workers’ due rights, such as back pay, holidays, and severance.

In precarious lodgings, improvised in the middle of the forest, workers slept on beds made of planks anchored to tree trunks



At the administrative level, if someone is caught in the act of employing slave labor, a notice of violation is issued for noncompliance with labor laws. If the charge is upheld after appeals at two administrative jurisdictions, the employer is included in the Register of Employers that Have Subjected Workers to Slavery-like Labor,²⁴ known as the Dirty List of Slave Labor.



The Dirty List

Created in 2003, the Dirty List of Slave Labor discloses data on individuals and corporations held administratively accountable for the crime of subjecting workers to slavery-like conditions.

The list is maintained by Brazil's Ministry of Labor and Employment (MTE) and updated twice a year. Before being held accountable and included on the list, employers exercise their right to defence at two jurisdictions. After being listed, they remain on it for two years.

Since July 2024, employers' names included on the Dirty List can be removed from the register. For that, they must sign conduct adjustment agreements or judicial agreements with the Federal Government, pledging to fulfil a series of duties and pay compensation to workers. If the agreement is approved, the employer is added to the Register of Employers under Conduct Adjustment.

The consequences of slave labor are not limited to the workers rescued; they also affect the constitutional social rights of Brazilian workers. Therefore, the Labor Prosecution Service (*Ministério Público do Trabalho, MPT*), which oversees compliance with labor laws, seeks compensation for individual and collective moral damages.²⁵

After slave labor is found, the Federal Prosecution Service (*Ministério Público Federal, MPF*) may suggest that the employer sign a conduct adjustment agreement (*Termo de Ajustamento de Conduta, TAC*) to regularize illegal practices and ensure payment of compensation. If the agreement is not complied with, the agency may file lawsuits against the employer at a Labor Court.

In the criminal realm, the Federal Prosecution Service will seek convictions of employers charged under Article 149 of the Criminal Code.²⁶ However, the slow progress of cases and divergent interpretations of judges regarding enforcement of the law make punishment difficult. “In decisions about degrading working conditions [one of the elements that characterize slavery-like labor], we often see judges saying it’s a cultural matter, as if it were legitimate: ‘That’s the way they do things in that the area, so it’s okay,’” explains federal prosecutor Igor Spindola.

A SLAVE, ME?

“Here, cattle are treated better than workers,” says João,²⁷ 49, who has worked on cattle ranches in Brazil’s North and Northeast regions since childhood. At the time of the interview, in May 2025, he was looking for work on properties

in São Félix do Xingu, a municipality in Pará with the largest cattle population in Brazil.²⁸

From 1995 to 2024,
65,600 workers were rescued
from slavery-like labor in Brazil;
17,300 of them worked in livestock
farming, the sector with the highest
number of slave labor cases
in the country.

Source: Data from the Ministry of Labor and Employment compiled by Repórter Brasil

In São Félix do Xingu, there are approximately ³⁷ cattle head per resident – 2.4 million for 65,000 inhabitants.²⁹ The municipality also holds the record for rescues from slave labor in the sector: between 1995 and 2024, there were 66 cases, according to MTE data compiled by **Repórter Brasil**.

When degrading situations become commonplace, workers themselves find it difficult to identify violations of their rights



João says that he left his family home in Tocantins state nine years ago and moved from farm to farm, never returning. "Some farms are actually not bad, but most are horrible," he explains. It is common, he says, to live in tarpaulin-covered shacks in the middle of the forest, receive less than the agreed-upon wages, and incur debts for food, often sold at exorbitant prices on the farm itself.

LABOR ANALOGOUS TO SLAVERY AFFECTS WHAT IS PERHAPS HUMANS' GREATEST ASSET: THEIR DIGNITY. THAT IS COMPLETE ANNIHILATION OF HUMAN DIGNITY.

Igor Spindola
Federal Prosecutor

In addition to João, ten other workers interviewed by **Repórter Brasil** and Climate Rights International confirmed the same work routine. "Here, everyone sleeps in shacks. That's how it works; there's no other way," says one of them.

"Normalization" of what is considered degrading conditions makes it difficult for workers to perceive that their rights are being violated.

João says he spent 150 days without any contact with his family because the shack where he was lodged, within a forested area of the farm, was located 27 km from any telephone signal. The place had no electricity or toilets. With no day off, João never considered that he might be subjected

to slavery-like conditions and that he might be entitled to rescue. "I've never needed that," he says.

"The first step towards a more sustainable industry is raising awareness. It is essential that workers know their rights so they can take action in certain situations," says Ilidia Carvalho de Melo, an agent with the Rural Workers' Union of São Félix do Xingu. "How are we going to fight it if they don't know what slave labor really is?," she adds. "Labor analogous to slavery affects what is perhaps humans' greatest asset: their dignity. That is complete annihilation of human dignity," explains Igor Spindola, a federal prosecutor in Pará.

TESTIMONY OF A RESCUED WORKER: a tarpaulin shack and Sunday-to-Sunday work

When he was called to build fences on a farm in São Félix do Xingu, Pará, Pedro³⁰ was promised an advance on his salary upon arrival. He did not see any money until he worked for about 40 days and was rescued by labor inspectors, about two years ago.

Pedro told **Repórter Brasil** that he was lodged in a tarpaulin-covered shack in the middle of the woods. There was no toilet or drinking water. The workers had to walk several kilometres in search of water. The food – basically rice and beans – was delivered to the group by the "cat," as the middlemen hired to recruit labor for field work are known. The group worked Sunday to Sunday, he says.

He did not finish school and he started in the job as a child, to help out at home. Pedro told **Repórter Brasil** he knows that the cattle produced on the

area's farms reach other countries and are part of a profitable supply chain. "They [large companies that receive the cattle] should look into it; they should come here and see how we work," he suggests. "They would see what workers go through. It's not easy. We work from Sunday to Sunday."

THE PROFILES OF THE WORKERS RESCUED

Pedro's story bears similarities to the those of many other workers.

José Batista, a lawyer for the Pastoral Land Commission (*Comissão Pastoral da Terra, CPT*),³¹ says that most victims of slave labor on cattle ranches are migrants from other parts of the country, lured by false promises of employment. Data compiled by **Repórter Brasil's** "Perfil Resgatado" project (Profiles of Rescued Workers)³² shows that 34% of those rescued from livestock operations between 2003 and 2023 came from Maranhão state.

Batista says that these workers are subjected to poor conditions at their destination due to extreme poverty. "Imagine a worker caught in a cycle like this? It's very difficult for them to escape," he explains. "A very small proportion [of victims of slave labor] file complaints. We have reports of dozens of cases in which those who tried to escape [from ranches] were murdered. This information circulates among workers and creates a climate of fear," he adds.

“

PROFIT IS THE WORD THAT SUMS IT ALL UP. IT'S THE MAIN FOCUS OF THIS CRIME. THEY EXPLOIT PEOPLE'S VULNERABILITY FOR THEIR LABOR

Ilidia Carvalho de Melo
Rural Workers' Union
of São Félix do Xingu

”

DEFORESTATION Pasture Clearing is the Main Driver of Deforestation

Pastures are recognized as the main drivers of agricultural expansion and clearing of native vegetation in the Brazilian Amazon.

From 2019 to 2024, Brazil lost 9.8 million hectares of vegetation cover – the area of South Korea.³³ The so-called Legal Amazon³⁴ accounted for 67% of the total area cleared during that period.³⁵ However, the MapBiomas project,³⁶ responsible for validating and publishing deforestation alerts in Brazil, points out that deforestation decreased in 2024 across all biomes for the first time since 2019.

Between 2019 and 2024, Brazil lost 9.8 million hectares of forest cover, the area of South Korea; 67% of the total area lost was in the Legal Amazon.

Source: Annual Report on Deforestation in Brazil, Mapbiomas, 2025

“Cutting down trees is illegal, right? It’s like carrying a gun on your belt. Nowadays, a chainsaw is like a pistol.” This is a quote from a worker who, for two decades, has been clearing pastures on cattle ranches in São Félix do Xingu, Pará.

He told **Repórter Brasil** that cattle ranchers hired him to lead groups of workers who clear the forest. Other groups, he explains, are responsible

for using the resulting timber to build fences and corrals on farms.

The process also involves burning the vegetation left after the trees are removed. “Too many animals die. They’re surrounded by fire and they can’t leave. Nothing escapes,” explains the worker interviewed.

People who clear pastures and then build fences and corrals are exposed to degrading conditions and are often subjected to slave labor, says Maria Gabriela Costa Grandi, a prosecutor with the Labor Prosecution Service (MPT) in Pará. “One violation leads to another,” she says. “For businesses to be able to deforest, they have to seek out this informal labor, and these workers are usually subjected to slavery-like conditions.



The process of clearing pastureland includes burning the vegetation that remains after the trees have been removed

They set up their tents in the middle of the forest, sleep there, eat there, and continue deforesting,” she adds.

“Illegal deforestation is a core topic in the debate about sustainability and supply chain challenges, especially in Brazil’s livestock farming,” says federal prosecutor Daniel Azeredo, one of the

creators of the Meat Industry Conduct Adjustment Agreement (Meat TAC).³⁷

Launched in 2009, the Meat TAC is an agreement signed between the Federal Prosecution Service and meatpackers operating in six of the nine Legal Amazon states.³⁸ It aims to block the purchase of cattle from areas illegally deforested after 2008, overlapping conservation units or indigenous lands, and employing labor in conditions analogous to slavery.

INVASION OF INDIGENOUS LANDS

Cattle are Grazing Illegally in Protected Areas

Illegal deforestation to expand cattle pastures also affects protected territories, such as indigenous lands.

Between 2018 and 2021, 114,000 hectares of deforested Indigenous land were turned into pastures, according to a survey by the InfoAmazonia portal. This survey concludes that this is the largest increase in pastureland in these territories in the last 37 years.³⁹ Of the total hectares used for pastures, 70% are concentrated in 15 Indigenous lands in the Legal Amazon.⁴⁰

Investigations published by **Repórter Brasil** have shown how cattle raised illegally in protected areas are linked to the supply chain of large meat processing companies operating in the country, such as JBS, Marfrig, Minerva, and Frigol.⁴¹

However, the new cases examined in this report show that the problem persists.



Cattle are grazed on the outskirts of the Apyterewa Indigenous Land in Pará



HOW DOES THIS CATTLE ENDS UP IN MEATPACKING PLANTS?

FARMS EVADE MONITORING

In October 2023, **Repórter Brasil** revealed that cattle rancher Vanubia Silva Rodrigues, then a JBS supplier in Pará, had her name included on the Dirty List of slave labor after two workers were rescued from one of her farms – Presente de Deus – in the previous year.⁴² At the time, JBS announced it would block her from its supplier list after her inclusion on the list.⁴³

However, new investigations conducted for this report show that Vanubia Rodrigues and the Presente de Deus farm supplied at least two direct JBS suppliers with cattle

for fattening after she was included on the Dirty List (*learn more about the case in the “Case Studies” chapter*), according to data from GTAs (Animal Transit Guide) accessed by **Repórter Brasil**.

The case illustrates one of the biggest challenges for monitoring of meatpackers and auditing sectoral agreements such as the Meat TAC: verifying socio-environmental compliance by farmers and farms that supply meatpackers’ direct suppliers, also known as “indirect suppliers.”



ANIMAL TRANSIT GUIDE

Created for health control purposes, the Animal Transit Guide (GTA) is a mandatory official document for transferring live animals in Brazil.

GTAs are issued by states and contain information such as the origin and destination of the animals, the purpose of the transfer (fattening, slaughter, etc.), characteristics, and vaccination records. The document allows tracking livestock moving between properties and from farms to slaughterhouses.

By cross-referencing GTA data with CAR information and satellite images, meatpackers can check the environmental compliance of their direct suppliers. However, they only have guaranteed access to documents that record the movement of cattle in the final link of the supply chain – from direct supplier farms to slaughter.

For this reason, companies claim they are unable to monitor all the farms where animals sold by farmers who do business directly with slaughterhouses had previously grazed.

“Monitoring doesn’t look at indirect suppliers,” explains Lisandro Inakake, head of the Boi na Linha program, an initiative created in 2019 by non-profit association Imaflora in partnership with the Federal Prosecution Service in order to accelerate the implementation of commitments in the industry.⁴⁴ In addition to the Meat TAC, an out-of-court settlement, the sector also has voluntary commitments such as the Amazon Public Livestock Commitment (*Compromisso Público da Pecuária, CPP*), joined by the three largest companies in the sector (JBS, Marfrig, and Minerva).⁴⁵

“That’s a loophole we face regarding our monitoring capacity, which depends on traceability, and also regarding block rules [of sectoral agreements]. Today we still don’t have rules for indirect suppliers,” Inakake adds.

“CATTLE LAUNDERING”

This loophole allows for manoeuvres to conceal irregularities in livestock farming. Animals usually pass through several farms before being finally sold to meatpackers, and not all stages of the supply chain are monitored. In some cases, there are actual animal transfers between properties, but in others, it is just part of a strategy to disguise the cattle’s origin.

In a manoeuvre known as “cattle laundering” or “triangulation,” ranchers conceal the illegal origin of their animals by recording their passage through farms with no socio-environmental issues preventing their sale to meatpackers.

This was the *modus operandi* of an illegal cattle-raising scheme within the Marãiwatsédé

Indigenous Land in Mato Grosso, revealed by **Repórter Brasil**⁴⁶ in June 2023. Documents obtained at the time showed that ranchers who illegally leased farms within the territory moved their cattle to other properties registered to themselves or family members, located in neighbouring municipalities. These, in turn, supplied animals to JBS.

In a manoeuvre known as “cattle laundering” or “triangulation,” ranchers conceal the illegal origin of their animals by recording their passage through farms with no socio-environmental issues preventing their sale to meatpackers.

“This origin-based fraud, designed to pretend that the cattle came from another property, is sufficiently criminal to be considered as cattle laundering. The animals arrive at the meatpacking plant as legal, but their origin is illegal. They have to launder it,” explains federal prosecutor Igor Spindola.

For Lisandro Inakake, commercial pressures may lead producers and meatpackers to fail to comply with regulations or ignore problems in their supply chains. “There are situations of non-compliance to which meatpackers’ buyers will turn a blind eye because they need to meet their targets. When I look at companies that maintain a certain level of non-compliance, that’s the reason. If monitoring has been going on for 10 years and there still non-compliance, there’s a systematic situation there: they go like ‘sometimes I just take the risk and buy it,’” he says.

SALES REGISTERED TO RELATIVES OR FAMILY BUSINESSES

Another unprecedented case described in this report is that of cattle rancher Marcos Borges de Araújo. He was charged in June 2018 with subjecting four workers to slavery-like conditions on the Pedra Preta and Futura farms he leased in São Félix do Xingu. Araújo was included on the Dirty List in April 2024.

According to animal transit records accessed by **Repórter Brasil**, Borges supplied animals to JBS from various properties in Pará between June 2018 and August 2023. After his name was listed, JBS began receiving animals from the Pedra Preta farm, intermediated by a company controlled by Borges’ family (*learn more about it in the “Case Studies” chapter*).

The case points to another loophole: merely blocking a listed producer included on the Dirty List. Without monitoring the producer’s connections, cattle raised on properties or by employers caught using slave labor may arrive at slaughterhouses with sales registered to relatives, family businesses, or even friends.

FRAUD IN THE RURAL ENVIRONMENTAL REGISTER

The Rural Environmental Registration (CAR), created with Brazil’s new Forest Code in 2012, records property boundaries, including information such as areas of consolidated use, legal reserves, and restricted use.⁴⁷ Because it is a georeferenced map of the properties, it enables analyses of possible overlaps with protected areas and fines



Because it is self-declared, a property's Rural Environmental Registry may contain false information, which makes it difficult to monitor environmental compliance in the sector

and embargoes imposed by environmental agencies. Therefore, the register is one of the main tools in the database for monitoring properties' environmental compliance in Brazil.⁴⁸

However, CAR information is declared by the properties' owners or tenants. The registration must be validated by the corresponding state agency. Due to the high number of CAR declarations that still need to be analysed by state departments, fraudulent registrations are still common.

"There are many CARs with false information in the system. These practices legitimize sales and circumvent our controls," points out Daniel Azeredo, a Federal Prosecutor and one of the creators of the Meat TAC.

A survey conducted by the Center for Climate Crime Analysis (CCCA) with support from **Repórter Brasil** showed that landowners in the Legal Amazon have been altering CAR information on their properties and, as a result, eliminating records of environmental violations such as IBAMA embargoes and overlaps with indigenous lands from their declared perimeter.⁴⁹

From 2019 to 2024, the study mapped 14,223 properties in states in the Legal Amazon

that changed their CARs, removing areas with environmental restrictions and causing the disappearance of 4.9 million hectares that used to be within their perimeters.

Another recurring situation that hinders monitoring of socio-environmental compliance in livestock farming is the division of properties into smaller farms, registered separately in the CAR system. The scheme is used in farms with irregularities to avoid being blocked for purchases. In practice, the farm operates as a single farm. On paper, however, the property is divided into several areas, and sales are recorded to the CAR with no socio-environmental restrictions.

From 2019 to 2024, at least 14,223 properties in the Legal Amazon changed their CAR registrations to exclude from their declared perimeter areas with environmental restrictions, causing 4.9 million hectares to "disappear," according to a survey conducted by the Center for Climate Crime Analysis with support from Repórter Brasil



CASE STUDIES

The cases below detail the supply relations of ten ranchers charged by state authorities with raising cattle on Indigenous lands, who had areas embargoed for illegal deforestation, and, most importantly, notified for subjecting workers to slavery-like conditions. Of the ten cases presented, eight involve farms located in states within the Legal Amazon.

The analyses of transit records from 2018 to 2025 showed that the cattle raised by the ranchers in question were transferred for fattening in other farms that supply meatpackers or, in some cases, even sent directly to be slaughtered at these companies.

Repórter Brasil's investigation, conducted in collaboration with Climate Rights International (CRI), reveals new connections between ranchers with socio-environmental irregularities and large meat processing companies such as JBS,

Minerva, Marfrig, and Frigol, as well as regional meatpackers such as Masterboi, Frigorífico Rio Maria, Frigorífico Pantanal, and Frigosaj.

All the companies mentioned in this report were contacted to comment on the cases. Their responses can be read in the chapter "What the Meatpackers Say."

Read the details of each case below.

1 _ PEDRA PRETA AND FUTURA FARMS **Marcos Borges de Araújo**

In June 2018, four workers were rescued from slavery-like conditions from the adjacent Pedra Preta and Futura farms in São Félix do Xingu. They had been hired to build and repair fences on the properties, according to the inspection report obtained by **Repórter Brasil**.

Two of the workers slept in a tarpaulin-covered shack in a structure that had previously served as a chicken coop at the Futura farm. The other two slept in a wooden shack that also served as a tool shed at the Preta farm. The conditions at the site “debased human dignity,” according to an excerpt from the report.

The document states that none of the sites had toilets, forcing the workers to relieve themselves in the woods and bathe in streams near their accommodation. The meat eaten by part of the group lodged at the Futura farm was stored in a freezer that only operated when the property’s generator was on – a few hours a day. Therefore, the inspectors found rotten meat that was served to the workers.

Both properties were economically exploited by Marcos Borges de Araújo, who signed a lease agreement with the landowners, according to the inspection report.

The Pedra Preta Farm, where 85% of the rancher’s cattle were raised, belongs to Agropecuária Vale dos Sonhos, a company owned by the Araújo family. Its controlling partner is the holding company Agro Investment Group Participações Societárias S/A. Information from a 2022 lawsuit accessed by **Repórter Brasil** indicates that Marcos Araújo is married to the holding company’s director partner.

As a result of the slave labor case, the rancher was included in the Dirty List in April 2024 and remains on it to date.

In addition to slave labor, Marcos Araújo and Agropecuária Vale dos Sonhos received notices of violation and embargoes for illegal deforestation by environmental agencies.

In 2018, Agropecuária Vale dos Sonhos had 585 hectares of land embargoed by IBAMA on a farm called Pedrinha, in Santana do Araguaia, Pará. The rancher has had 100 hectares embargoed since 2013 at the Morada do Sol farm in São Félix do Xingu, Pará.

In addition to IBAMA’s notice of violation, Morada do Sol was inspected by the São Félix do Xingu Municipal Environmental Department that same year, which issued 20 notices against the farmer, totalling R\$1 million in fines. In 2014, Araújo signed a Conduct Adjustment Agreement (TAC) with the municipal environmental agency, converting the fines into donating a pickup truck and hiring flight hours for the environmental agency, in addition to committing to restore the illegally deforested areas.

SUPPLY CHAIN

From June 2018 to August 2023, Marcos Araújo supplied cattle to the JBS units in Redenção and Santana do Araguaia, both in Pará, according to animal transit records accessed by **Repórter Brasil**. The cattle came from several of his farms in Pará, including Veluma, Cachoeira, and São Domingos Sávio, which, during this period, received cattle for fattening from the Pedra Preta farm, where the slave labor case took place.

After his name was included on the Dirty List in April 2024, Araújo stopped sending animals to JBS under his own name. Starting the following month, however, cattle from Pedra Preta began to be supplied to the JBS unit in Santana do Araguaia, Pará, on behalf of Agropecuária Vale dos Sonhos, according to GTA data accessed by **Repórter Brasil**.⁵⁰

THE OTHER SIDE

Through his lawyers, Marcos Araújo claims that he “was not responsible for the employees found by the inspection” at Pedra Preta and Futura, and that he “did not subject any worker to slavery-like conditions.”

The rancher explained that he is appealing the sanction in court. In the lawsuit, filed in May 2024 and accessed by **Repórter Brasil**, Araújo requests the annulment of the sanction and the removal of his name from the Dirty List. After unfavourable decisions at first and second jurisdictions, he awaits decisions on appeals by the Superior Labor Court.

Regarding the environmental embargoes on the Morada do Sol farm, Araújo stressed that he sold the property “many years ago” and that only IBAMA can lift the embargo “after the current owner has completed environmental regularization of the property.” To date, the sanction remains in effect, according to a search conducted by **Repórter Brasil** on IBAMA’s public list of embargoes. “Mr. Marcos Borges still has pending environmental issues at the Morada do Sol farm, which was sold to a third party years ago, but the continued embargo also causes losses,” the lawyers argued.

Regarding the Pedrinha Farm, Araújo’s lawyers claim that, at the time of the embargo in 2018, the property did not belong to Agropecuária Vale dos Sonhos. Furthermore, they say that the area under embargo was part of the property’s legal reserve, which was the scene of a fire in 2014 and has since been recovered. “And although his defence was filed in 2018, IBAMA has not yet ruled on the administrative proceeding,” say the

lawyers, who claim that the company is no longer the property’s administrator.

When contacted, Vale dos Sonhos stated that it has no legal relationship with producer Marcos Borges de Araújo and that it “operates 100% within the law.”

2 – PRESENTE DE DEUS FARM **Vanubia Silva Rodrigues**

In July 2022, two workers were rescued from slavery-like conditions at the Presente de Deus farm in Ourilândia do Norte, Pará.

One of the workers was a cowboy while the other worked as a general laborer, doing tasks such as building fences. They were lodged in the back of the property’s machinery shed, according to the inspection report obtained by **Repórter Brasil**.

Their dirt-floor accommodation had no windows or doors and lacked furniture, such as beds. Personal belongings and food were arranged on benches, shelves, and tables built by the workers from wooden planks, according to the inspectors.

A makeshift outdoor toilet had been built out of zinc panels and wooden slats. To shower and store water, they used pesticide bottles, which cannot be reused.

Cattle rancher Vanubia Silva Rodrigues was sanctioned for the violation and included on the Dirty List of slave labor in October 2023.

SUPPLY CHAIN

After her inclusion was published, **Repórter Brasil** revealed that, throughout 2022, Rodrigues shipped cattle from Presente de Deus to JBS plants in Redenção and Santana do Araguaia, Pará.⁵¹ At the time, the meatpacker reported that she had been blocked from its supplier list after her name was included on the Dirty List.

According to GTA information accessed by **Repórter Brasil**, cattle shipments from Presente de Deus to JBS occurred at least until April 2023 in the case of the meatpackers' Redenção plant and August 2022 in the case of its Santana do Araguaia plant. Therefore, both cases occurred after the slave labor case was found. Data from the Pará State Agricultural Defence Agency (*Agência de Defesa Agropecuária do Estado do Pará, ADEPARÁ*)⁵² accessed by **Repórter Brasil** also show that, after being listed, Rodrigues supplied cattle for fattening to at least two direct suppliers of JBS units in Redenção.

In December 2023, the Presente de Deus Farm registered the transfer of 144 animals to the Pé do Morro Farm in Água Azul do Norte, Pará. Five days later, the same farm issued animal transit guides to transfer exactly the same number of animals, of the same sex and age, to JBS in Redenção.

In April 2024, the Maranata farm, also located in Ourilândia do Norte, received 300 cattle head for fattening from Presente de Deus. In the same period, the farm sold 54 animals of the same sex and age to JBS in Redenção. Between April and June 2024, the property also sold dozens of other animals to the same JBS unit and to Frigorífico Rio Maria, a meatpacker located in Rio Maria, Pará.



The accommodation at Fazenda Presente de Deus had no windows, doors, or furniture. Victims used makeshift benches and tables to store clothes and food.

THE OTHER SIDE

In response to questions sent by **Repórter Brasil**, Vanubia Silva Rodrigues stated only that she had signed a TAC with the MPT, which, according to the rancher, was fully complied with.

3 _ DELTA DO TRIUNFO FARM

Celio dos Reis Campos de Amaral

An inspection operation rescued five workers at the Delta do Triunfo Farm, in São Félix do Xingu, in June 2021. Celio dos Reis Campos de Amaral was in charge of the property. He was sanctioned for subjecting the workers to slavery-like conditions.

The workers rescued included a 15-year-old teenager who was harvesting and cutting wood to be used in the construction of a corral. Carrying out this type of activity at this age, combined with working without protection from the sun, rain and cold, is listed among the Worst Forms of Child Labor by an ILO convention to which Brazil is a signatory.⁵³

According to the inspection report obtained by **Repórter Brasil**, the group was housed in two tarpaulin shacks they built themselves in the middle of the woods, about 3 km from the farm's headquarters.

The inspection report also indicates that the workers had no place to eat with electricity, and their only food items were rice, beans, flour, and coffee, which were prepared on a makeshift stove made from a tin can, using firewood and diesel. Their animal protein came from fish they caught in a stream in the farm or by hunting animals such as alligators. Their only source of water was a creek located near the shacks.

After the arrest, Celio Amaral refused to pay the workers' legally required severance fees and legal compensation, leading the Labor Prosecution Service (MPT) to file a Public Civil Action (*Ação Civil Pública, ACP*) against him. The labor debts were settled more than a year after the rescue, following a judicial settlement with the agency.



Workers rescued at the Delta do Triunfo Farm were housed in a canvas shack in the middle of the forest



Workers rescued at the Delta do Triunfo Farm used a makeshift stove made from a tin can, fueled by firewood and diesel, and were only given rice, beans, and flour

Celio Amaral was included on the Dirty List of slave labor in October 2023.

In addition to the sanction for employing slave labor, Amaral owns five areas that are embargoed by IBAMA for deforestation in the Delta do Triunfo farm between 2010 and 2023, totalling 816 hectares.

SUPPLY CHAIN

Data from GTAs accessed by **Repórter Brasil** and information released by ADEPARÁ indicate that Delta do Triunfo sent animals to farms belonging to people who directly supplied three meatpackers: Frigol, JBS, and Frigorífico Rio Maria.

From June 2021 to November 2022, Delta do Triunfo supplied cattle for fattening to at least three farms, which then sent animals directly to Frigol.

The Maria Paula farm, located in Pau D'Arco, Pará, received animals from Delta do Triunfo in June 2021, the same month of the slave labor case. Between July of that year and May 2023, the farm sent animals for slaughter at Frigol's facilities in Água Azul and São Félix do Xingu, Pará.

The Recanto do Buriti farm in São Félix do Xingu received animals from Delta do Triunfo in July 2021, one month after the workers were rescued. Between July of that year and May 2022, the farm supplied animals for slaughter at the Frigol facility in São Félix do Xingu, Pará.

A third property, the São Lucas II farm, also located in São Félix do Xingu, received animals from Delta do Triunfo in November 2022 and sent cattle for fattening at the Frigol facility in the same municipality in January 2023.



São Félix do Xingu, in Pará, holds the record for slave labor cases in cattle ranching: between 1995 and 2024, there were 66 cases

JBS also sourced cattle from farms supplied by Celio Amaral.

The Maria Paula farm, which received cattle from Delta do Triunfo in June 2021, sent animals for slaughter at JBS facilities in Redenção and Santana do Araguaia, Pará, in November and December 2023, and in January 2024.

Sítio Rancho Fundo, a property located in São Félix do Xingu, received animals from Delta do Triunfo in June 2021, when slave labor was found on the property. In August and September of the same year, the property supplied cattle to the JBS unit in Tucumã, Pará.

A third slaughterhouse, Frigorífico Rio Maria, also had among its direct suppliers a farm supplied by the rancher charged with slave labor. The Maria Paula farm supplied Frigorífico Rio Maria, in the

municipality of the same name, between October and November 2022.

THE OTHER SIDE

By phone and audio messages sent to the **Repórter Brasil**, Celio Amaral said that he was not given the right to a defence during the inspection and denied that the workers were subjected to slavery-like conditions.

Following the lawsuit filed by the Labor Prosecution Service (MPT), he was ordered to pay fines to the workers. Amaral argues that he reached an agreement with the prosecutors, that he is fulfilling his part, and that he will file a lawsuit to remove his name from the Dirty List.

He did not comment on the environmental embargoes filed by IBAMA at the Delta do Triunfo farm.

4 _ GRATÃO FARM

Augusto Gratão

In September 2020, Federal Police officers rescued five workers from slavery-like labor at the Gratão farm, located between the municipalities of Araguaína and Nova Olinda, Tocantins. Among them, there was a 15-year-old teenager.

After the police operation, inspectors from the Ministry of Labor and Employment (MTE) visited the property and confirmed the case of slave labor and sanctioned the owner Augusto Gratão.

The workers, who performed activities such as clearing pastures, applying pesticides, and repairing fences, were lodged in a shack built of wooden planks on dirt floor, according to the inspection report obtained by **Repórter**

Brasil. Without access to bathrooms, the group showered in a nearby stream and drank its water.

Augusto Gratão's name was included on the Dirty List in April 2022. It was removed when the list was updated in April 2024.

SUPPLY CHAIN

Animal transit records accessed by **Repórter Brasil** show that, in December 2023, while still on the Dirty List, Gratão sent animals for fattening from the Gratão farm to Vista Alegre, a property belonging to a producer with the same last name and located just three kilometres away.



The only source of water for workers rescued at the Delta do Triunfo Farm was a stream located near the shacks

The Vista Alegre Farm, in turn, supplied animals to Masterboi, a meatpacker in Nova Olinda, Tocantins, in December 2023 and January 2024.

THE OTHER SIDE

When contacted through his lawyer, Augusto Gratão did not respond to questions sent by **Repórter Brasil**.



Without sanitary facilities, workers at the Gratão Farm bathed and drank water from a stream near their lodgings

5 _ SÃO GREGÓRIO FARM

José Jansen Rodrigues Carreiro

José Jansen Rodrigues Carreiro is a defendant in a lawsuit filed by Funai in 2017 seeking the removal of illegal occupants from the Krikati Indigenous Land, located between the municipalities of Montes Altos, Amarante do Maranhão, Lajeado Novo, and Sítio Novo, all in Maranhão state.

Officially recognized in 2004,⁵⁴ the Krikati Indigenous Land has been the site of conflicts between Indigenous people and rural producers for at least two decades. In 2017, the removal of invaders from the territory was halted by a court order so that conciliation hearings could be held between the Indigenous people and non-Indigenous occupants.

In 2022, the Federal Prosecution Service in Maranhão requested the cancellation of the hearings and the resumption of the removal procedure,⁵⁵ after being alerted to the increase in deforestation in the territory and invasions by new occupants and former residents who had already received compensation.⁵⁶

This is the case of cattle rancher José Carreiro. In June of this year, a decision by a Federal Court in Imperatriz, Maranhão, confirmed that Carreiro had already been compensated by Funai and that he had occupied the land again. The court then ordered him to leave the area.

Carreiro used to raise cattle on a farm within the Indigenous Land. In June 2024, a patrol from the Maranhão Environmental Police Unit (BPA-MA) found cattle illegally grazing in an area – known as São Gregório farm, in Montes Altos, Maranhão – occupied by a rancher within the Indigenous

territory. José Carreiro was ordered to remove his 120 cattle head from the site within 15 days, and the property was interdicted.

SUPPLY CHAIN

Information from Animal Transit Guides accessed by Repórter Brasil indicates that in August 2024, José Jansen Rodrigues Carreiro sent 25 animals for fattening at the Conquista farm, owned by another rancher and also located in Montes Altos, Maranhão.

The transit records indicate that the animals came from an establishment called “Angical,” located in the same municipality. However, in a lawsuit filed by Carreiro to overturn the ban imposed by the Environmental Police on the São Gregório Farm, his lawyer claims that he “has no other place to raise his animals.”

Days after receiving cattle from José Carreiro, the Conquista farm sent 27 animals of the same sex and age for slaughter at the JBS plant in Araguaína. In October of the same year, Masterboi’s meatpacking plant in Nova Olinda also received 30 head of cattle from the Conquista Farm.

THE OTHER SIDE

Repórter Brasil was unable to locate cattle rancher José Carreiro.

6 _ VARJÃOZINHO FARM **Raimundinho Gomes Barros**

Cattle rancher Raimundinho Gomes Barros was also caught by the Maranhão Environmental Police Unit (*Batalhão de Polícia Ambiental, BPA-MA*) in June 2024 raising cattle within the Krikati Indigenous Land. He was ordered to remove within 15 days 80 head of cattle from the Varjãozinho farm in Lajeado Novo, and the property, which overlaps with the Indigenous Land, was interdicted by authorities.

Three years before being sanctioned, Barros had 251.8 hectares of land embargoed for illegal deforestation, according to IBAMA, within Indigenous territory. The embargo was imposed on another property, the Traíras farm, also in Lajeado Novo. For the environmental violation, the producer was fined R\$1.5 million.

According to records from the National Rural Environmental Register System (*Sistema Nacional de Cadastro Ambiental Rural, SICAR*) and the Maranhão State Agricultural Defence Agency, the Traíras farm is officially located near the southern border of the Krikati Indigenous Land, outside the territory. However, SICAR’s time-based monitoring data kept by **Repórter Brasil** show that, until 2022, the property’s area overlapped with the Indigenous Land. Later, the rancher amended the records to remove the overlap from official records – at least on paper.

Since April 2023, Barros has been appealing IBAMA's sanctions in court. He claims that the areas where the deforestation occurred do not belong to him – a claim disputed by the environmental agency. In the lawsuit, Barros claims that the embargo that interrupted livestock activities is causing him financial losses. IBAMA sustains, however, that he continued to exploit the area even after the embargo. As of July 2025, the embargoes remained in effect.

Barros is also listed as a defendant in a lawsuit filed by FUNAI to remove ranchers from the Indigenous land.

SUPPLY CHAIN

In January 2023, Raimundinho Barros sent 226 animals from the Traíras farm for fattening at the Santa Helena farm, owned by another rancher and located in São João do Paraíso, Maranhão. In turn, Santa Helena supplied 52 animals for slaughter at Masterboi's meatpacking plant in Canhotinho, Pernambuco, in June 2024.

THE OTHER SIDE

Repórter Brasil was unable to reach Raimundinho Barros for comments on the investigation.

7_ SANTA RITA FARM

Antônio Leucir Mascarello

Seven workers were rescued from slavery-like conditions at the Santa Rita farm in Santa Carmem, Mato Grosso, in October 2019.

The group was preparing the land to plant soybeans and was lodged in a dirt-floor shack covered by tarpaulin discarded after being used for grain storage, according to the inspection report obtained by **Repórter Brasil**.

The water for consumption, food preparation, and hygiene came from unsealed wells and had a muddy appearance, according to the inspectors who found the slave labor case. Without running water, the workers relieved themselves in the woods. They bathed outdoors, in a roofless

Sign marking the Krikatí Indigenous Land in Maranhão, riddled with bullets. Indigenous people suffer from illegal cattle ranching in the territory



structure with four wooden stakes supporting a tarp that covered its sides.

Due to the use of slave labor, the owner of the Santa Rita farm, Antônio Leucir Mascarello, was included on the Dirty List in April 2022. The rancher's name was removed from the list when it was updated in April 2024.

The site where the workers were rescued is part of a complex of contiguous areas with separate CARs. They all belong to different members of the Mascarello family. In addition to grain cultivation, cattle are raised on the complex.

Although Antônio Leucir Mascarello was the only person sanctioned for the slave labor case, the inspection procedures – including agreements to pay the rights of the workers rescued – were largely handled by his son Marcos Henrique Mascarello. In a statement to inspectors, one of the workers rescued also said that he received orders from both Antônio and Marcos.

SUPPLY CHAIN

Between August 2022 and July 2023, while Antônio Leucir Mascarello's name was on the Dirty List of slave labor, his son Marcos Henrique Mascarello supplied cattle to Marfrig meatpacking plants in Tangará da Serra and Várzea Grande, both in Mato Grosso do Sul, according to transit records accessed by **Repórter Brasil**.

The animals are registered as coming from the Santa Rita IX farm, one of the properties belonging to the Mascarello family in the same area where the rescue occurred. According to



Workers at the Santa Rita Farm lived in makeshift shacks covered with tarpaulin, without access to drinking water or bathrooms

CAR records, the property belongs to Santa Rita Participações e Administração, which has both Antônio Leucir and Marcos Henrique as partners.

THE OTHER SIDE

Repórter Brasil attempted to contact the Mascarello family through their lawyer but received no response. Marcos Henrique was also contacted but did not respond either.

8 _ ALTO GUAPORÉ FARM Tomas Andrzejewski

In July 2022, seven workers were rescued from the Alto Guaporé farm in Vila Belada Santíssima Trindade, Mato Grosso, owned by Tomas Andrzejewski.

According to an inspection report accessed by **Repórter Brasil**, the rescued workers used to sleep in tents set up in the shade of a Guarani fig tree.

There were no toilets at this location or at the work fronts, forcing the workers to relieve themselves in the woods. According to the inspection report, since there was a woman in the group, they “erected a small black tarpaulin enclosure with straw and a hole in the ground in an attempt to give her some privacy.”

The water used by the group was provided by a water truck. The workers bathed using buckets and containers in a makeshift structure made of timber, straw, and tarpaulin.

Work tools and protective equipment were purchased by the workers themselves, which violates labor laws. The cost of these items was illegally deducted from their wages. In statements to inspectors, the workers reported that they did not even know how much was deducted.

The employer, Tomas Andrzejewski, was included on the Dirty List in October 2024 and remains on it to this day.

SUPPLY CHAIN

In December 2024, after being included on the Dirty List, the Alto Guaporé farm sent cattle for fattening at the Flor do Cerrado II farm in Cáceres, Mato Grosso, according to animal transit records accessed by **Repórter Brasil**. These records indicate that the purchase of animals from Alto Guaporé was registered to Alex Kohls Andrzejewski, the son of the sanctioned rancher. In January 2025, Flor do Cerrado II supplied animals to a Marfrig unit in Várzea Grande, Mato Grosso.

Agropecuária Madenorte, in Nova Lacerda, Mato Grosso, was another farm that received animals



Evidence of slave labor on cattle farms indicates that workers are exposed to degrading conditions

from Alto Guaporé in December 2024, after it was included on the Dirty List. The following month, the farm sent animals for slaughter to Frigorífico Pantanal in Várzea Grande and to JBS in Pontes e Lacerda, both in Mato Grosso, between February and July 2025.

The Alto Guaporé farm also sent animals to the Santa Lucia I farm in Sapezal, Mato Grosso, in April 2024, before Tomas Andrzejewski was included on the Dirty List. From May to September of that year, the Santa Lucia I farm supplied two Minerva meatpacking plants in Mato Grosso, in the municipalities of Mirassol D'Oeste and Paranatinga.

THE OTHER SIDE

Through his lawyer, Tomas Andrzejewski stated that he does not condone “any exploitation of labor” and that he had no knowledge of the workers’ conditions at the Alto Guaporé farm because he started managing the property in April 2022, three months before the rescue. He said he was battling a brain tumour at the time of the

operation, which “impaired his ability to rigorously oversee the farm’s extensive operations.”

In July 2022, Andrzejewski signed a Conduct Adjustment Agreement (TAC) with the Labor Prosecution Service to pay compensation to the workers. In June 2024, according to documents submitted by his lawyer, the MPT attested to his full compliance with the TAC. He then argues that, prior to the cattle transaction with Alex Andrzejewski, the labor irregularities had already been “fully solved and the administrative proceedings with the MPT had been shelved.”

The rancher also claims that the sales contract between father and son was formalized in August 2024, before his inclusion on the Dirty List, which occurred in October. According to him, the cattle were not transported in August “due to atypical conditions of drought and fire risk for cattle transport, and lack of pasture in the region.”

The lawyer also reported that Andrzejewski is seeking an agreement with the Ministry of Labor and Employment to remove his name from the



Dirty List and become part of the Registry of Employers under Conduct Adjustment (*Cadastro de Empregadores em Ajuste de Conduta, CEAC*).⁵⁷

Through his lawyer, producer Alex Kohls Andrzejewski emphasized that the animals sent by Fazenda Flor do Cerrado II for slaughter at Marfrig were not the same ones he received from Fazenda Alto Guaporé. According to the rancher, the animals received from Alto Guaporé were females for breeding and calves in the nursing phase, both of the Nelore breed. The animals sent to Marfrig, on the other hand, were heifers of the Crioula breed, raised on his property.

9 _ TRÊS ESTRELAS FARM

Egídio Vilani Comin

Six workers who were building and repairing fences, including five Paraguayan citizens, were rescued from slavery-like conditions at the Três Estrelas farm in Corumbá, Mato Grosso do Sul, in February 2023.

According to the inspection report obtained by **Repórter Brasil**, the group was lodged in a tarpaulin shack built by themselves using tree trunks and branches, in a clearing in the middle of the forest. The workers used to shower and wash their clothes in a pond near the shack.

The workers were recruited by a Paraguayan citizen who signed a service contract with the property's owner Egídio Vilani Comin. However, according to labor inspectors, he was "unfit to take on the risks of the economic activity" and "he worked and was lodged in the same conditions as other workers." Therefore, he was also rescued.



At the Três Estrelas Farm, workers built lodgings out of canvas and logs in the middle of the forest, without sanitary facilities or beds

For subjecting workers to slavery-like conditions, the Federal Prosecution Service initiated criminal proceedings against Egídio Vilani Comin in August 2023.

Comin was included on the Dirty List in April 2024, but his name was removed a month later by a court order. The injunction granted to Comin ensured that his name would be out of the register until the conclusion of the criminal lawsuit filed by the MPF, which is still pending.

SUPPLY CHAIN

After being caught employing slave labor, Egídio Vilani Comin supplied cattle to JBS units in Campo Grande and Anastácio, both in Mato Grosso do Sul state, between March 2023 and August 2024. The sales originated from two other farms owned by him and located in Bela Vista and Bodoquena, Mato Grosso do Sul.

THE OTHER SIDE

After being questioned by **Repórter Brasil**, Comin's lawyer stated that the "workers were regularly hired as contractors" and that "the contract provided for payment, advances, food purchases, and all other previously established business conditions, demonstrating that the relationship was always based on transparency and legality."

Comin states that neither the administrative sanction nor the lawsuit contain any "allegations of workers being subjected to degrading treatment, debt bondage, or restricted movement" and that

"the only point under discussion is the alleged failure to provide lodgings." The rancher denies that the workers were sleeping in makeshift shacks, which he describes as a "fallacy."

10 _ GUANABARA FARM

Eduardo Augusto Espírito Santo Novaes

Three workers were rescued from slavery-like conditions at the Guanabara farm in Ribeirão do Lago, Bahia, in August 2019. According to the inspection report accessed by **Repórter Brasil**, one of them had worked there for 14 years without a formal contract or payment of labor rights such as holidays and annual bonus salary.

The inspection report describes that, in one of the facilities where two rescued workers were lodged, they slept on makeshift beds made from old wooden doors and sawhorses. One of them used a nylon bag and his own clothes as a pillow.

During the operation, Eduardo Augusto Espírito Santo Novaes, the Guanabara farm's manager, signed a Conduct Adjustment Agreement with the Federal Prosecution Service where he accepted to pay compensation for moral damages to the workers and adopt measures to ensure compliance with labor laws.

According to the MPF, Novaes breached several clauses of the agreement, including the payment of compensation, which he only did two years after the initial deadline, when MPF and the Federal Public Defender's Office (*Defensoria Pública da União*, DPU) filed a lawsuit against him.

He was acquitted by first and second level court decisions of the crime of keeping workers in slavery-like conditions. The MPF can still appeal the decision.

Eduardo Novaes was included on the Dirty List four years after the inspection, in October 2023, and remains on it.

SUPPLY CHAIN

Animal transit records accessed by **Repórter Brasil** indicate that Novaes sent animals for slaughter to Frigosaj Frigorífico, a meatpacking company located in Santo Antônio de Jesus, Bahia, from November 2022 to October 2023, when he was included on the Dirty List.

The GTAs indicate that the animals came from another property where Eduardo Novaes raises

cattle – the Olhos D'água farm in Ibicuí, Bahia, 170 kilometres from Ribeirão do Lago, where the slave labor case was found.

THE OTHER SIDE

Producer Eduardo Novaes did not respond to **Repórter Brasil's** attempts to contact him.

WHAT THE MEATPACKERS SAY

JBS, Brazil's largest meatpacker, did not respond to **Repórter Brasil's** questions about specific cases. The company stated only that "all producers on the slave labor dirty list are blocked by JBS."

Minerva emphasized its commitment to monitor indirect supplier farms in all South American countries where it operates by 2030, and said it already monitors 100% of its direct suppliers in



the region. The company stated that every direct supplier is evaluated with each new sale and immediately blocked in the event of irregularities, and that it adopts measures to track indirect suppliers using protocols and technologies “that seek to ensure compliance throughout the livestock supply chain.” The company also stressed that it has achieved 100% compliance in direct purchases in the latest audits conducted under the Meat TAC and the Amazon Public Livestock Commitment (CPP).

As for producer Tomas Andrzejewski, who supplied cattle to a direct Minerva supplier (the Santa Lucia I farm), the company stated that it has no business relations with employers on the Dirty List and that, at the time of the purchase, the CAR of the direct supplier property included no socio-environmental irregularities.

Marfrig, for its part, stated that it does not buy from suppliers included on the Dirty List of slave labor and follows the protocol of the Boi na Linha project. Furthermore, it is developing initiatives to monitor its supply chain, such as the “Supplier Network Map” tool, which includes data from the Visipec platform that “allows us to identify direct and indirect farms where the animals passed before reaching the meatpacking plant,” it noted.

The meatpacker stated that producers Tomas Andrzejewski and Antônio Leucir Mascarello are blocked, and that it also blocked Marcos Henrique Mascarello after identifying his connection to Antônio Leucir.

The meatpacker said that Marcos Henrique’s last supply to the company occurred in June 2024. It underscored that, at the time of the purchase,

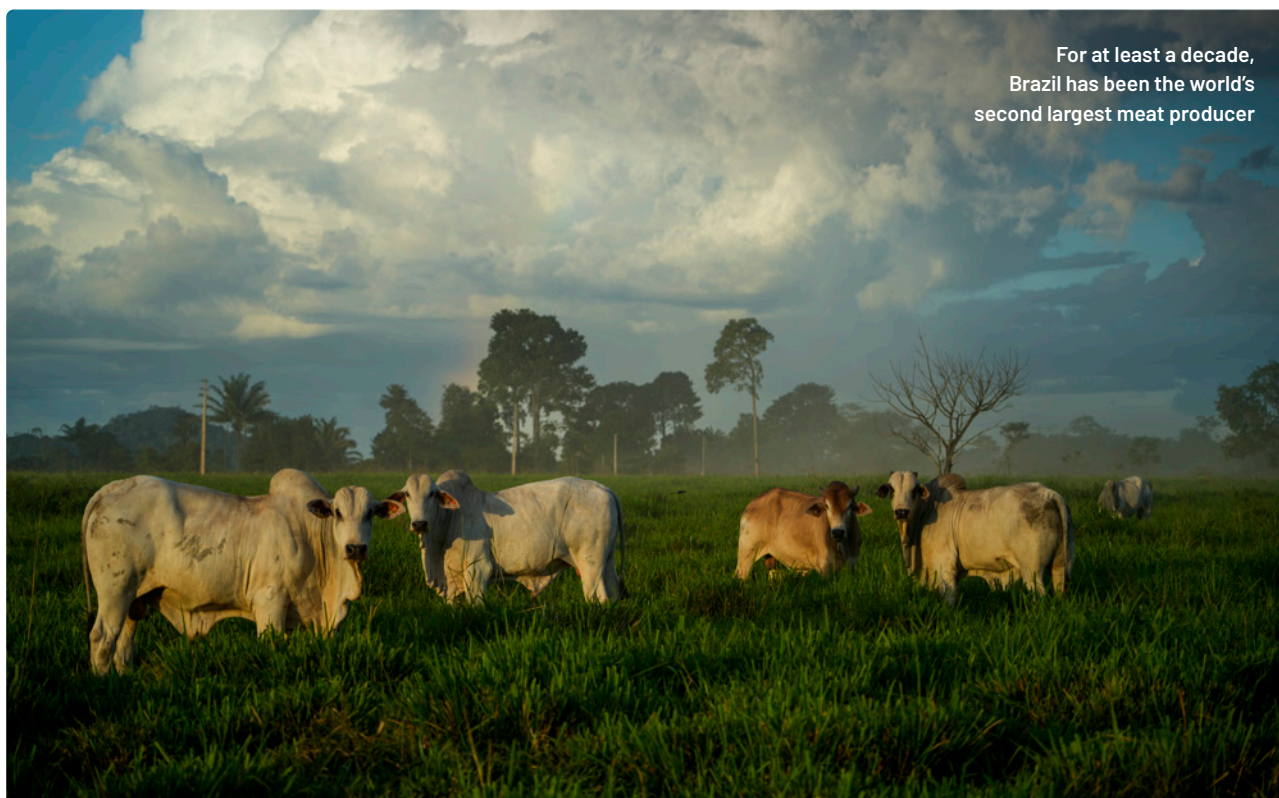
the transactions met all social and environmental compliance criteria, that it cross-referenced information with the farm’s Corporate Taxpayer Registration (CNPJ, Santa Rita Participações e Administração) and the producer’s Individual Taxpayer Registration (CPF), and that “both were fully compliant with the relevant criteria.”

In the case of Alex Kohls Andrzejewski and the Flor do Cerrado II farm, Marfrig stated that it conducted prior consultations to the Dirty List and found no pending issues.

Frigol stated that cattle rancher Celio dos Reis Campos de Amaral and the Delta do Triunfo farm never supplied the company. Regarding its direct suppliers cited in the investigation – the Maria Paula, Recanto do Buriti, and São Lucas II farms – Frigol stated that, at the time of the purchases, they were all in compliance with social and environmental criteria. “Since the use of slavery-like labor is attributed to an alleged indirect supplier of these farms, Frigol clarifies that at the time, it did not yet monitor 100% of its Tier 1 indirect suppliers.” Later, in January 2025, the company stated that it had blocked the São Lucas II farm for failing to comply with the environmental criteria of the Boi na Linha Protocol.

Frigol, a signatory to the Meat TAC in Pará, also emphasized that, since 2023, it has been monitoring 100% of its Tier 1 indirect suppliers in the Amazon through the Visipec platform, and that it intends to advance the deadline for its goal of zeroing deforestation by indirect suppliers to 2025, supporting individual animal traceability initiatives.

Pantanal, a meatpacker whose direct supplier received animals from Tomas Andrzejewski, who was



For at least a decade,
Brazil has been the world's
second largest meat producer

sanctioned for employing slave labor in July 2022, stated that it uses georeferencing systems, satellite images, and public database searches to monitor and track its supply chain. However, according to the company, this process is limited by lack of access to information from animal transit records issued in the country, including data on animal transfers between properties. “Therefore, the controls adopted aim to mitigate risks as much as possible, even with the structural limitations on access to certain public information,” the company said.

Pantanal, which is also a signatory to the Meat TAC and uses the Visipec platform to monitor indirect suppliers, said it conducts periodic audits, requires contractual compliance clauses, and cuts ties when it finds indirect producers involved in irregularities such as slave labor or illegal deforestation. “To date, is has not been possible to confirm that producer Tomas Andrzejewski was ever part of our indirect

supply chain,” it added.

Masterboi reported that it monitors all direct suppliers before each purchase and shipment, automatically blocking non-compliant properties, including cases of slave labor. In the case of the Gratão farm, Masterboi said it blocked the property immediately after its inclusion on the Dirty List. Since 2018, it has used the Visipec platform to monitor Tier 1 indirect suppliers. The company also claimed to have achieved 100% compliance in MPF audits under the Meat TAC.

The meatpackers’ full responses can be read at the end of this report (*Appendix - What the Meatpackers Say*).

Frigorífico Rio Maria did not respond to our questions and **Repórter Brasil** was unable to contact Frigosaj.



PERSPECTIVES AND RECOMMENDATIONS

MONITORING ALL LINKS IN THE SUPPLY CHAIN

Gaps in the traceability of Brazilian cattle have been a well-known and publicized issue for decades. In 2009, a Greenpeace report revealed that large meatpacking companies in Brazil were purchasing cattle from illegal farms in the Amazon.⁵⁸ That same year, the MPF and IBAMA intensified inspections in the state of Pará. Based on these actions, the MPF signed conduct adjustment agreements with meatpackers in the state, giving rise to the industry-wide Meat TAC. In 2020, the agreement was expanded to include five other states in the Legal Amazon.

The terms of the agreement include audits between signatory companies to assess compliance in their purchases.⁵⁹ In case of non-compliance, they may be subject to sanctions, such as fines. Compliance is also assessed for companies that have not joined the TAC.⁶⁰ In this case,

if irregularities are found, they may become defendants in public civil lawsuits.⁶¹

Although it has existed since 2009, only two unified audit cycles have been conducted in 15 years – involving, in addition to Pará, a pioneer in the agreement, the states of Acre, Amazonas, Mato Grosso, Rondônia, and Tocantins.

The second audit cycle, with results publicized by the MPF in May 2025, analysed 89 meatpackers based on commercial transactions carried out in 2022.⁶² Companies that did not join the TAC and did not undergo audits were automatically checked by the analysis of satellite images and CAR and GTA data compiled by the agency.

According to Daniel Azeredo, one of prosecutors in charge of the Meat TAC, automatic monitoring

has increased the visibility of irregularities and the effectiveness of control. “The main benefit of this is that it put an end to invisibility for those who were evading the process. Now, even companies that refused to undergo audits have had their data assessed and transparently disclosed to the entire market,” he emphasizes.

Among signatory companies, the audits found 4% of irregularities in meat purchases.⁶³ The non-compliance rate rises to 52% among unaudited meatpackers assessed by automatic systems.⁶⁴

Indirect suppliers are still the major gap in supply chain monitoring in Brazil. In addition to direct purchases, the Meat TAC audit released in 2025 provided preliminary data on those suppliers for the first time.

In the cases evaluated between 2020 and 2021,⁶⁵ just over a third of indirect suppliers (38%) were in compliance with the agreement’s criteria. In 35% of cases of indirect suppliers with irregularities, the animals originated from properties that did not correspond to their CARs.⁶⁶

The numerous transfers of cattle, from birth to slaughter, make monitoring this process more challenging. According to sources interviewed by **Repórter Brasil**, tracking capacity is compromised by the difficulty in accessing and ensuring transparency of data such as animal transit records and validated CARs from supplier properties.

In the cases examined between 2020 and 2021 in Meat TAC audits, only 38% of indirect suppliers were in compliance with the agreement’s criteria

“Once I get to know the supply chain, I can act. Those who hold the data – and that’s usually the government – have to make public policies based on this. It’s no use for the private sector alone to simply block purchases,” says Lisandro Inakake.

INDIVIDUAL MONITORING

Individual and technological monitoring, which can be done using ear tags or subcutaneous chips, is presented by experts and authorities as a more effective solution for ensuring the traceability of Brazilian cattle from birth to slaughter. This type of tracking can monitor the history of transfers between farms as well as cattle’s vaccination and health status, which helps prevent diseases and illnesses that could, for example, prevent exports.⁶⁷

In September 2024, the Pará State Government announced the creation of the Pará Individual Cattle Traceability System (*Sistema de Rastreabilidade Bovínea Individual do Pará*, SRBIPA). The government has promised to tag all cattle in transit by December 2025.⁶⁸ As of July this year, only 0.2% of the state’s 25 million animals had been identified, and the system has not yet incorporated environmental data that would allow the identification of animal husbandry in illegal areas⁶⁹.

At the federal level, the Ministry of Agriculture and Livestock (MAPA) launched the National Plan for Individual Cattle and Buffalo Identification (*Plano Nacional de Identificação Individual de Bovinos e Búfalos*, PNIB) in December 2024.⁷⁰ The plan’s implementation deadline, however, is 2032. Furthermore, the criteria for implementing the initiative have yet to be detailed, and many questions remain about how the new system can ensure adequate transparency for the socio-environmental monitoring of cattle transactions in the country.

Despite the gaps, experts believe that frauds like “cattle laundering” could be more easily identified with individual tracking. “It’s not a technological or funding issue. We need leaders who take on this central role,” notes prosecutor Azeredo.

“We need to gather both government and private support, develop commercial agreements, laws and standards that regulate the supply chain so we can focus on origin,” adds prosecutor Spindola. “Cataloguing properties that practice slave labor is a step forward, but if we can’t prove where the cattle come from, we’ll have a hard time turning this progress into something meaningful,” he says.

Frauds like “cattle laundering” would be easier to detect with individual cattle tracking. “It’s not a technological or funding issue. We need leaders who take on this central role

GTA TRANSPARENCY

Unlike individual animal tracking, GTAs provide information about animals transported as a group. However, while individual traceability of Brazilian cattle is not yet possible, the widespread dissemination of GTA data could facilitate the monitoring of indirect suppliers.

Although essential for traceability, GTAs are not available for public consultation in some Brazilian states, which claim that the documents contain confidential information that prevents their full disclosure.⁷¹

“

IT’S NOT A TECHNOLOGICAL OR FUNDING ISSUE. WE NEED LEADERS WHO TAKE ON THIS CENTRAL ROLE

Daniel Azeredo
prosecutor at the Federal
Prosecution Service

”

For at least a decade, the Federal Prosecution Service has issued recommendations to state health agencies to ensure easy and up-to-date access to GTAs.⁷²

In Pará, for example, the Federal Prosecution Service is waging a legal battle with the State Agricultural Defence Agency (ADEPARÁ) for disclosure of detailed GTA data in the state.⁷³ The prosecutors claim that “the lack of this data prevents society from monitoring and overseeing environmental management related to animal transportation in the state, compromising the right to administrative transparency.”⁷⁴ After being forced by a Federal Court to comply with the MPF’s request, ADEPARÁ was granted an appeal to prevent the data from being disclosed.⁷⁵ A new appeal for the data’s release, this time filed by the MPF in February 2025, is still awaiting a decision.⁷⁶

Resistance to disclose GTAs is not limited to state agencies. The Brazilian Agriculture and Livestock Confederation (*Confederação da Agricultura e Pecuária do Brasil*, CNA) has already spoken out against efforts to disclose the documents, claiming that they expose sensitive data on cattle ranchers’ assets and financial transactions.⁷⁷

The CNA argues that the documents should only be used for health monitoring purposes, not for socio-environmental tracking.

CAR REGULARIZATION

Brazil has 7.9 million registered CARs, but only 357,000 have had their environmental regularity analysis completed by states, according to data from the Brazilian Forest Service.⁷⁸ Since CAR registrations are self-declared, all information needs to be validated.

This backlog creates room for fraud in CAR declarations, as mentioned previously. Therefore, strengthening the system, which is an essential tool in the socio-environmental monitoring of properties, is necessary to regularize the sector.

"It is important that states advance their CAR validation agenda, for example, by implementing automatic locks so that it will not accept false information such as properties located within rivers, on indigenous lands, within protected areas, or deforested areas," emphasizes prosecutor Azeredo.

Starting in June of this year, the Environment Department of Mato Grosso, Brazil's largest beef producer,⁷⁹ implemented the Digital CAR 2.0 system, which automatically analyses self-declared CAR information – e.g. boundaries, permanent preservation areas, and legal reserves – using official databases that include information such as river maps, vegetation, and conservation units.⁸⁰

In the new model, however, discrepancies in information regarding Areas of Anthropized Land Use (*Áreas de Uso Antropizado do Solo, AUAS*) will have a 30-metre tolerance and cannot exceed five hectares per polygon. "This will eliminate many of the problems," Mato Grosso's Environmental Secretary Mauren Lazzaretti promised during a presentation of the Digital CAR system.⁸¹

BLOCKING BY GEOGRAPHIC LOCATION

The cases found confirm that blocking suppliers based on their names published on the Dirty List is not enough to interrupt the supply of that product. The solution presented by prosecutor Azeredo is for blocks to also be implemented according to geographic coordinates, encompassing the entire property.

"The lists are based on names and CPFs (Individual Taxpayer Registration), making them very easy to breach. Control must be based on geographic location, area, latitude, and longitude, because that can't be changed. The location gets blocked," he says.

DUE DILIGENCE

Simply blocking a cattle rancher after he or she is included on the Dirty List is not only ineffective, as the cases presented in this report demonstrate, but it also does not help expand the scope of monitoring beyond rescue operations.



Meatpacking plants and international buyers must adopt effective due diligence mechanisms, with permanent monitoring and anticipation of the risks of socio-environmental violations

Sources interviewed by **Repórter Brasil** emphasize the need for meatpackers and companies at downstream levels of the supply chain, such as retail chains, in Brazil and abroad, to take action to identify irregularities in their supply chains and block suppliers before slave labor is found.

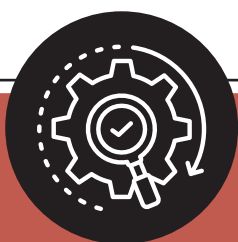
Ongoing monitoring and risk anticipation are part of a process known as due diligence.⁸²

That companies adopt their own traceability and due diligence systems is one of the recommendations of a study on the promotion of human rights and fair working conditions in Brazil's leather supply chain, published in May 2025 by the Fair Labor Association in collaboration with the organization Impactt.⁸³

The study also recommends that brands using leather in their products create coalitions of companies in the sector to monitor the supply chain and create a collective advocacy agenda with the government to strengthen, for example, labor inspection procedures.⁸⁴

While Brazil does not yet have specific legislation mandating corporate due diligence, initiatives are underway, such as Bill 572/2022, currently under consideration in parliament.⁸⁵ Internationally, the debate is more advanced.

The legislation with the greatest potential to affect Brazilian beef is the European Union Deforestation Regulation (EUDR).⁸⁶ Approved in 2023, the EUDR prohibits imports of cattle, coffee, soybeans, timber, rubber, cocoa, and palm oil from forest areas deforested after 2020.⁸⁷ Although the law



DUE DILIGENCE

Due diligence is an ongoing process by which companies identify, assess, prevent, and account for the adverse impacts of their activities. This process should encompass not only the company's direct operations but also its supply chain.

focuses primarily on environmental issues, it also requires import companies to ensure that these commodities are produced in compliance with national laws, labor rights, and human rights protected by international law.

The implementation of the EUDR was postponed after discussions with agribusiness sectors, which requested more time to adapt to the new rules.⁸⁸ The new law is expected to come into effect in December 2025 for medium- and large-size companies and in June 2026 for micro and small businesses.⁸⁹

For labor prosecutor Maria Gabriela Costa Grandi, responsibility must be shared by all stakeholders in the supply chain. "It is the company's duty to monitor its entire supply chain. There are international standards that provide for this need. When we speak of the concept, a supply chain encompasses everything, from raw material extraction to the supply of the product to the end consumer," she emphasizes. ■



ANNEX

**What the
Meatpackers Say**

Read the full statements submitted by the meatpacking companies mentioned in this investigation:

JBS

4 July 2025

All producers on the Dirty List of slave labor have been blocked by JBS.

Minerva

14 July 2024

Minerva Foods recognizes that the perennity and success of its business depends on the sustainability of the ecosystems that support agricultural production. In 2021, Minerva Foods announced its Commitment to Sustainability and set a goal of developing and implementing a monitoring program for indirect supplier farms in all South American countries where it operates by 2030. To meet these goals, it has already achieved 100% monitoring of all its direct suppliers in the region.

To address this commitment in a practical way, Minerva Foods manages its suppliers through a series of initiatives, actions, and activities aimed at ensuring compliance and transparency in its supply chain, based on three pillars: direct suppliers, indirect suppliers, and supplier retraining and reinstatement.

Every direct supplier property that sells cattle to Minerva Foods undergoes a compliance analysis in accordance with socio-environmental criteria, cattle sourcing policy, and current legislation in each country of operation. Compliance checks are conducted on the supplier and its property with each new sale. If any non-compliance with these criteria is found, the supplier is blocked from the system, preventing further sales until the situation is regularized.

To make progress with indirect suppliers, the company has been implementing various initiatives and practices related to traceability and socio-environmental monitoring, such as protocols, technologies, and tools, which seek to ensure compliance throughout the cattle supply chain.

Regarding the supplier cited by Repórter Brasil, Minerva Foods reaffirms its commitment to respecting human rights and the country's labor legislation. Therefore, we inform you that we do not have any type of business relationship with employers or producers included on the Dirty List of employers who subjected workers to slavery-like conditions published by the Ministry of Labor and Employment (MTE). We emphasize that they are blocked immediately after the producer or supplier's name is officially included on the list. Until this inclusion occurs, business activities are evaluated to ensure that they fully meet our internal compliance and social and environmental responsibility criteria.

Regarding the aforementioned CAR, after a detailed analysis under the company's strict social and environmental criteria, no irregularities were found related to the property or its owner, which had no environmental or social liabilities at the time of the transaction. The company emphasizes that it

consults lists and public information for each new transaction, and suppliers are immediately blocked as soon as any irregularity is found.

Finally, the company emphasizes that this monitoring process is subject to annual third-party audits, and the most recent audits found that purchases achieved 100% compliance. This means that all socio-environmental criteria defined in the Amazon Cattle Supplier Monitoring Protocol and the Public Livestock Commitment (CPP) were met, having been audited by BDO RCS Independent Auditors.

Audit reports, purchasing policy, and other information are available for public access on the Minerva Foods website.

Marfrig

July 11, 2025

Marfrig clarifies that it does not purchase animals from suppliers on the Dirty List of Slave Labor and that it strictly follows the Amazon Cattle Supplier Monitoring Protocol, also known as the “Boi na linha Protocol,” signed with the Federal Prosecution Service.

Among the three cases cited by Repórter Brasil, the company clarifies that suppliers Antônio Leucir Mascarello and Tomas Andrzejewski were blocked.

Producer **Marcos Henrique Mascarello** was also blocked as soon as Marfrig found his connection to Antônio Leucir. His last sale to Marfrig was recorded in June 2024. The company stresses that, at the time of purchase, the transactions fully met the criteria of the Amazon Cattle Supplier Monitoring Protocol, and it conducted the entire process of cross-referencing information between the farm’s CNPJ (Santa Rita Participações e Administração LTDA) and the producer’s CPF (Marcos Henrique), and both were fully compliant with the relevant criteria.

In the case of producer Alex Kohls Andrzejewski and the Flor do Cerrado II farm, the company reports that searches were also conducted on the Dirty List of Slave Labor before the negotiations for the acquisition of the animals mentioned in the report, covering both the producer’s CPF and the CNPJ of the farm, since it is not registered to Alex Kohls’ name. Nothing was found that violated the Amazon Cattle Supplier Monitoring Protocol.

Marfrig also emphasizes that, in addition to the aforementioned producer monitoring and tracking systems, it develops initiatives to map and monitor its supply chain. To this end, the company implemented a tool called “Supplier Network Map,” which is comprised of supplier data from both direct partners and the Visipec tracking platform. This allows us to identify the direct and indirect farms where the animals passed before reaching the meatpacking plant.

Marfrig stresses that its cattle purchasing process is verified annually by independent auditors, and the company has achieved 100% compliance. The most recent report is publicly available and can be found in the “Content Centre” section of the website www.marfrig.com.br.

Additional statement sent on 17 July 2025

Marfrig clarifies that it does not purchase cattle from suppliers included on the Dirty List of Slave Labor and strictly follows the Amazon Cattle Supplier Monitoring Protocol, also known as the “Boi na Linha Protocol,” signed with the Federal Prosecution Service.

Regarding the cases mentioned by Repórter Brasil:

Antônio Leucir Mascarello and Tomas Andrzejewski are both blocked from Marfrig’s supplier list;

- Marcos Henrique Mascarello was blocked as soon as his connection to Antônio Leucir was found. His last sale to Marfrig was recorded in June 2024. At that time, the information was verified and he was found to be in full compliance with the Monitoring Protocol, with cross-referencing between the farm’s CNPJ (Santa Rita Participações e Administração LTDA) and the farmer’s CPF (Individual Taxpayer Registry)(Marcos Henrique);
- Alex Kohls Andrzejewski and the Flor do Cerrado II farm: prior to the negotiation, consultations were conducted on the Dirty List of Slave Labor, covering both the farmer’s CPF and the farm’s CNPJ (which is not registered in Alex Kohls’ name). No irregularities were found according to the Monitoring Protocol criteria;
- Marfrig reiterates that it maintains several traceability mechanisms to ensure suppliers’ compliance. Among these, the “Supplier Network Map” tool stands out, which integrates data on direct and indirect suppliers with information from both direct partners and data from the Visipec platform. This allows us to identify direct and indirect farms through which the animals passed before arriving at the meatpacking plant.

Marfrig’s animal sourcing process is audited annually by independent auditors, with the company achieving 100% compliance.

FRIGOL **4 July 2025**

FriGol places sustainability at the core of its business strategy. Therefore, it has focused its efforts on continuously evolving to address one of the industry’s greatest challenges: socio-environmental monitoring of the supply chain.

Regarding NGO Repórter Brasil's inquiry into allegations of slavery-like labor at the Delta do Triunfo farm, owned by cattle rancher Célio dos Reis Campos de Amaral in São Félix do Xingu, Pará, Frigol clarifies that neither the farm nor its owner have ever supplied the company. They are not even listed as suppliers.

The company emphasizes that, as a signatory to the Sustainable Livestock TAC of the State of Pará, it uses Imaflora's "Boi na Linha" Protocol to monitor its direct suppliers. It conducts periodical independent audits submitted to the Federal Prosecution Service in Pará (MPF-PA) and, for the last three consecutive audit cycles, it has achieved 100% compliance in cattle purchases from its direct suppliers, as can be seen in the results released by the MPF-PA, which demonstrate that direct suppliers do not produce in deforested areas, Indigenous lands or conservation units, and that they are not listed as organizations involved in slave labor.

Socio-environmental monitoring is not limited to the Amazon biome. Since 2018, Frigol has implemented its protocol in all states where it has production units, meaning it monitors 100% of its direct suppliers in all biomes where it operates (Amazon, Cerrado, and Atlantic Forest). Additionally, the company provides socio-environmental information on all fresh products delivered to customers and consumers in domestic and international markets, using QR Codes on their packaging. This protocol was developed within the Lençóis Paulista production unit (and is used across all units) in partnership with Ecotrace Solutions, using secure data via Blockchain. Since the end of 2023, QR Codes have also informed the biome where the cattle originated.

Still for direct suppliers, FriGol was the first meatpacking company to implement the Voluntary Monitoring Protocol for Cattle Suppliers in the Cerrado in July 2023, even before the protocol's final publication on April 22, 2024. The protocol is coordinated by Proforest, Imaflora, and the National Wildlife Federation (NWF).

Regarding the other properties mentioned by NGO Repórter Brasil, which allegedly acquired cattle from Celio dos Reis Campos de Amaral's Delta do Triunfo farm in São Félix do Xingu, Pará, from June 2021 to November 2022, Frigol clarifies that the Jarina farm, in Altamira, Pará, never supplied the company. However, the Sítio Rancho Fundo farm in São Félix do Xingu, Pará, did supply cattle outside the aforementioned period. During that period, Frigol was supplied by the Maria Paula farm in Pau D'Arco, Pará, the Recanto do Buriti farm, and the São Lucas II farm, both located in São Félix do Xingu, Pará. At the time of the purchases, all farms were in socio-environmental compliance with the criteria of the Boi na Linha protocol applied to direct suppliers. Later, in January 2025, the São Lucas II farm was blocked due to non-compliance with the environmental criteria of the same protocol.

Since the use of slavery-like labor is attributed to an alleged indirect supplier of these farms, Frigol clarifies that at the time, it did not yet monitor 100% of its Tier 1 indirect suppliers.

Aware of the need for progress on this topic and in line with best practices, since January 2023, 100% of Tier 1 indirect suppliers in the Amazon Biome have been monitored through the Visipec system provided by NWF, using the GTFI Protocol of the Indirect Suppliers Working Group. In response to a

request from the Brazilian Federation of Banks (*Federação Brasileira de Bancos*, FEBRABAN) to the Brazilian beef sector, monitoring results for 2023 and 2024 are available on our website. Note that the indirect supplier analyses, via Visipec, cross-references information from CARs (Rural Environmental Registry) of FriGol's direct suppliers with the public GTA (Animal Transit Guide) database, providing the best possible information on who issued GTAs to direct suppliers in the 36-month period prior to the slaughter date.

The company believes it uses the best indirect supplier monitoring system available. It treats this as "the best information" because it is not possible to effectively determine whether the cattle under an issued GTA actually passed through the properties, as GTA data is not public and is protected by Brazil's General Data Protection Law (*Lei Geral de Proteção de Dados*, LGPD).

Frigol's goal is to mitigate deforestation by indirect suppliers by 2030, with the intention of advancing mitigation of Tier 1 indirect deforestation to 2025.

To this end, it is committed to working with industry institutions, the supply chain, and public authorities to advance this goal. The company believes that, in the country with the world's largest cattle population, only individual animal traceability for socio-environmental purposes will make it possible to mitigate deforestation across all links in the cattle supply chain.

Therefore, Frigol is working closely with the state of Pará, which has pioneered developments to become the first state in Brazil with individual animal monitoring focused on socio-environmental criteria.

At the same time, the company supports private initiatives to monitor individual animals. Therefore, it has joined the Primi Protocol, the only one operating in the state of Pará and which has become a reference for individual animal monitoring.

Frigorífico Pantanal

3 July 2025

In response to the questions raised, Frigorífico Pantanal Ltda. presents the following clarifications:

1) Does Frigorífico Pantanal have the means to ensure that the animals purchased from Agropecuária Madenorte did not originate from the Alto Guaporé farm while the property was on the Dirty List of Slave Labor? Which are those means?

Frigorífico Pantanal adopts rigorous verification, monitoring, and traceability procedures throughout its supply chain. The company uses georeferencing systems, satellite images and consultation to official public databases such as the "Dirty List of Slave Labor" kept by the Ministry of Labor, and INPE's alert systems (Prodes/DETER). It should also be noted that the public database of GTAs (Animal Transit Guides) is not available for consultation by industries and other agro-industrial enterprises, since the government does not provide access to this information or to data on GTA transfers between properties.

Therefore, the controls adopted aim to mitigate risks as much as possible, even with the structural limitations on access to certain public information.

2) Is Tomas Andrzejewski authorized to supply animals to Frigorífico Pantanal? What is the date (month/year) of his last sale?

According to Frigorífico Pantanal's internal controls and updated records, producer Tomas Andrzejewski is neither authorized nor registered for commercial transactions. In any case, there are no records of any transactions with this producer to date.

3) Does Frigorífico Pantanal know if Tomas Andrzejewski was ever part of the company's indirect supply chain? What recommendations and procedures does the company follow in these cases?

Frigorífico Pantanal recognizes the importance of monitoring the indirect supply chain and adopts measures to mitigate socio-environmental risks, even though this tracking represents one of the sector's greatest structural challenges. Measures implemented include periodic audits, contractual clauses requiring legal compliance, and participation in sector-specific initiatives focused on traceability. In cases where indirect producers are found to be engaging in irregularities such as slave labor or illegal deforestation, the company's protocol provides for the termination of the indirect business relationship, immediate notification of the direct suppliers involved, and implementation of corrective measures, including strengthening contractual compliance clauses. To date, it has not been possible to confirm that producer Tomas Andrzejewski was ever part of our indirect supply chain.

4) In general, what traceability and monitoring practices does Pantanal adopt in its direct and indirect supply chain?

Frigorífico Pantanal adopts a structured set of socio-environmental compliance practices and policies applied to its direct supply chain and, progressively, to its indirect supply chain, as follows:

- Regular consultation to official public databases: IBAMA, MAPA, MTE (the Dirty List), INCRA, CAR, ICMBio/IBAMA embargoes, and other environmental registers;
- Daily verification of GTAs (when available) to trace the origin of animals in the direct supply chain;
- Geospatial satellite monitoring to detect overlap with embargoed areas, conservation units, and indigenous lands;
- Adherence to the Meat TAC and the MPF's Supplier Monitoring Protocol since 2020;
- Partnership with the VISIPEC platform to improve indirect supply chain monitoring;
- Automatic blocking suppliers that are non-compliant with environmental, land, or labor standards, with periodic audits;
- Training and educational initiatives on best practices and current legal requirements, aimed at suppliers.

Frigorífico Pantanal reaffirms its commitment to legality, sustainability, and respect for human rights and the environment throughout its direct and indirect supply chains.

We are available to clarify any doubts.

Masterboi

4 July 2025

All cattle suppliers are monitored before each purchase and before each shipment for slaughter, in accordance with the criteria of the Boi na Linha Protocol (Monitoring Protocol for Cattle Suppliers in the Legal Amazon). Any non-compliance results in the automatic block of the supplier property.

Cases with CPF or CNPJ numbers on the Ministry of Labor's list of slavery-like labor are also automatically blocked by the geomonitoring platform used by the company.

In the specific case of the Gratão farm, the property was blocked immediately after the publication of the MPT's list.

Regarding indirect suppliers, the company has maintained a technical cooperation agreement with Friends of the Earth, the National Wildlife Federation, and the World Wildlife Fund since 2018 to implement best practices related to Tier 1 indirect suppliers. These initiatives include the use of the "VISIPEC" tool, developed by the University of Wisconsin in partnership with the NWF, using information available on the platform.

All properties with which the company maintains business relations are monitored with each new purchase and shipment for slaughter, ensuring 100% compliance in audits conducted by the Federal Prosecution Service and recognition as a reference for its transparent and ethical practices.

Frigorífico Rio Maria did not respond to our questions and **Repórter Brasil** was unable to contact Frigorífico Frigosaj.

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- 9 Article 231 of Brazil's 1988 Federal Constitution states that indigenous lands "are inalienable and nontransferable and the rights thereto are not subject to statute of limitation." Available at: <https://www.jusbrasil.com.br/topicos/10643688/artigo-231-da-constituicao-federal-de-1988> / https://www.stf.jus.br/arquivo/cms/legislacaoConstituicao/anexo/brazil_federal_constitution.pdf
- 10 Examples:
<https://reporterbrasil.org.br/2020/06/boi-pirata-criado-em-terra-indigena-e-a-conexao-com-frigorificos-marfrig-frigor-mercurio/> and
<https://reporterbrasil.org.br/2022/09/gado-criado-ilegalmente-em-terra-indigena-no-para-abastece-jbs-e-frigor/>
- 11 One example is the removal of invaders – including cattle ranchers – from the Apyterewa Indigenous Land in Pará. Read more about it at: <https://reporterbrasil.org.br/2025/02/dois-tiroteios-elevam-tensao-terra-indigena-apyterewa/> / <https://reporterbrasil.org.br/2025/02/indigenas-reocupam-fazendas-gado-ilegal-trabalho-escravo-pa-apyterewa/> / <https://reporterbrasil.org.br/2023/10/operacao-de-guerra-cerca-invasores-de-ti-mais-desmatada-na-amazonia/>
- 12 Examples: <https://reporterbrasil.org.br/wp-content/uploads/2022/09/220902-Monitor-Pecuaria-PT-06.pdf> / <https://reporterbrasil.org.br/wp-content/uploads/2020/11/Monitor-Grana-e-Pecuaria-2020-PT.pdf> / <https://reporterbrasil.org.br/wp-content/uploads/2020/12/Monitor-8-Trabalho-escravo-na-industria-da-carne.pdf>
- 13 Quais são os maiores frigoríficos de carne bovina do Brasil? Available at: <https://globo.rural.globo.com/pecuaria/noticia/2024/11/quais-sao-os-maiores-frigorificos-de-carne-bovina-do-brasil.ghtml>
- 14 There are 2.45 million cattle head in São Félix do Xingu, according to data from the 2023 Municipal Livestock Survey by IBGE (the Brazilian Institute of Geography and Statistics). Available at: <https://sidra.ibge.gov.br/tabela/3939#resultado>. Cases of slave labor on livestock farms, in turn, were compiled by Repórter Brasil using data from the Ministry of Labor and Employment (MTE). From 1995 to 2024, 66 cases were recorded in São Félix do Xingu.
- 15 2023 Municipal Livestock Survey by the Brazilian Institute of Geography and Statistics (Instituto Brasileiro de Geografia e Estatística, IBGE). Available at: <https://sidra.ibge.gov.br/tabela/3939#resultado>
- 16 BRASIL. Lei nº 10.803, de 11 de dezembro de 2003. Altera o art. 149 do Decreto-Lei nº 2.848, de 7 de dezembro de 1940 - Código Penal, para estabelecer penas ao crime nele tipificado e indicar as hipóteses em que se configura condição análoga à de escravo. Brasília: Casa Civil, 2003. Available at: https://www.planalto.gov.br/ccivil_03/Leis/2003/L10.803.htm.
- 17 Ibid.
- 18 Ibid.
- 19 https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029
- 20 PLANT, Roger. Modern Slavery – the Concepts and Their Practical Implications. Geneva: International Labor Office, 2014. Available at: <https://www.ilo.org/publications/modern-slavery-concepts-and-their-practical-implications>
- 21 <https://agenciabrasil.ebc.com.br/direitos-humanos/noticia/2023-11/falta-de-audidores-fiscais-dificulta-combate-ao-trabalho-escravo>
- 22 <https://www.ipea.gov.br/porta/categorias/45-todas-as-noticias/noticias/15705-baixa-fiscalizacao-pode-explicar-permanencia-da-informalidade-mesmo-em-cenario-de-baixo-desemprego>

- 23 In hard-to-reach locations or in cases of serious violations, inspections are carried out by teams from the Special Mobile Inspection Group (Grupo Especial de Fiscalização Móvel, GEFM), comprised of labor inspectors and members of institutions such as the Labor Prosecution Service, the Federal Police, and the Federal Public Defender's Office. Created in 1995, GEFM teams have carried out over 8,000 operations. Available at: <https://www.gov.br/trabalho-e-emprego/pt-br/noticias-e-conteudo/2025/maio/grupo-movel-do-mte-completa-30-anos-na-luta-contr-o-trabalho-escravo>.
- 24 <https://www.gov.br/trabalho-e-emprego/pt-br/assuntos/inspecao-do-trabalho/areas-de-atuacao/combate-ao-trabalho-escravo-e-analogo-ao-de-escravo>
- 25 <https://www.prt2.mpt.mp.br/mpt-sp/atribuicoes>
- 26 <https://www.mpf.mp.br/o-mpf#>
- 27 Fictitious name. The actual name has been omitted for security reasons, to protect the worker's true identity.
- 28 There are 2.45 million cattle head in São Félix do Xingu, according to data from the 2023 Municipal Livestock Survey by IBGE (the Brazilian Institute of Geography and Statistics). Available at: <https://sidra.ibge.gov.br/tabela/3939#resultado>.
- 29 Data from the 2023 Municipal Livestock Survey and the 2022 Census, both conducted by IBGE. Available at: <https://sidra.ibge.gov.br/tabela/3939#resultado> and <https://www.ibge.gov.br/cidades-e-estados/pa/sao-felix-do-xingu.html>
- 30 Fictitious name. The actual name has been omitted for security reasons, to protect the worker's true identity.
- 31 The Pastoral Land Commission (CPT) was created in 1975 to help rural workers subjected to slavery-like conditions who fled farms. Since then, the organization has promoted campaigns against slave labor and published annual reports on violence in rural areas. More information at: <https://www.cptnacional.org.br/sobre-nos>
- 32 Repórter Brasil's Rescued Profile cross-references information from three MTE databases (Radar SIT – Virtual Panel with data on rescues from slave labor in Brazil; Unemployment Insurance Registration for Rescued Workers; and Reports on operations produced by labor inspectors) from 2003-2023 in order to present an unprecedented compilation of the profile of workers subjected to slave labor in the country.
- 33 <https://brasil.mapbiomas.org/2025/05/15/mapbiomas-desmatamento-caiu-em-todos-os-biomas-brasileiros-em-2024/>
- 34 The region, which accounts for 61% of Brazil's territory, encompasses the states of Acre, Amapá, Amazonas, Mato Grosso, Pará, Rondônia, Roraima, and Tocantins, as well as part of Maranhão. In addition to the entire Amazon biome, it also includes 20% of the Cerrado biome and part of the Pantanal. Available at: <https://oeco.org.br/dicionario-ambiental/28783-o-que-e-a-amazonia-legal/>
- 35 <https://brasil.mapbiomas.org/2025/05/15/mapbiomas-desmatamento-caiu-em-todos-os-biomas-brasileiros-em-2024/>
- 36 What is MapBiomas? Available at: <https://brasil.mapbiomas.org/en/faq/o-que-e-o-mapbiomas/>
- 37 Information about meatpacking plants that signed the Meat TAC can be accessed on the website of the Boi da Linha Project, an initiative created by the Imaflora organization and the MPF to monitor compliance with the sector's agreements: <https://www.boinalinha.org/transparencia/>
- 38 Acre, Amazonas, Mato Grosso, Pará, Rondônia and Tocantins. Available at: <https://imaflora.org/noticias/tac-da-carne-completa-15-anos-com-abrangencia-ampliada-mas-ainda-enfrenta-resistencia-na-coleta-de-informacoes>
- 39 <https://infoamazonia.org/2023/05/04/expansao-de-pastagens-em-terras-indigenas-triplica-em-4-anos-e-ameaca-povos-isolados-da-amazonia/>
- 40 Ibid.
- 41 Examples of investigations produced by Repórter Brasil on the topic: <https://reporterbrasil.org.br/2023/06/fornecedores-da-jbs-criaram-ilegalmente-gado-em-terra-indigena-em-mt/> / <https://reporterbrasil.org.br/2022/09/gado-criado-ilegalmente-em-terra-indigena-no-para-abastece-jbs-e-frigor/> / <https://reporterbrasil.org.br/2020/06/boi-pirata-criado-em-terra-indigena-e-a-conexao-com-frigorificos-marfrig-frigor-mercurio/>
- 42 <https://reporterbrasil.org.br/2023/10/nova-lista-suja-do-trabalho-escravo-traz-5-fornecedores-da-jbs-e-13-garimpos/>
- 43 <https://reporterbrasil.org.br/2023/10/integra-dos-posicionamentos-da-jbs-e-minerva-foods/>
- 44 <https://www.boinalinha.org/quem-somos/>
- 45 The Amazon Public Livestock Commitment created in 2009 by Greenpeace set minimum criteria for industrial-scale cattle and beef operations in the Amazon by the country's three largest meatpacking companies – JBS, Marfrig, and Minerva. In 2017, Greenpeace announced it would no longer participate in the implementation of the Commitment “following the recent scandals involving the livestock sector and the political context of socio-environmental setbacks.” Available at: <https://www.greenpeace.org/brasil/blog/apos-escandalos-greenpeace-suspende-participacao-no-compromisso-da-pecuaria/> / <https://www.boinalinha.org/wp-content/uploads/2022/08/COMPLETO-Protocolo-de-Auditoria-PORTUGUES-Boi-na-Linha-Imaflora-060-8088-ALT6-WEB.pdf>
- 46 <https://reporterbrasil.org.br/2023/06/fornecedores-da-jbs-criaram-ilegalmente-gado-em-terra-indigena-em-mt/>
- 47 https://www.planalto.gov.br/ccivil_03/_ato2011-2014/2012/decreto/d7830.htm

- 48 <https://www.boinalinha.org/wp-content/uploads/2022/08/Guia-Cumprimento-Protocolo-de-Monitoramento.pdf>
- 49 <https://reporterbrasil.org.br/2024/10/fazendeiros-mudam-area-declarada-propriedades-apagam-registros-desmate/>
- 50 Agricultural Defence Agency of the State of Pará. Available at: <https://lookerstudio.google.com/u/0/reporting/69ee14b8-baa2-4af0-bd80-c1b4fb2e66d2/page/67tZE>. Consulted in July 2025.
- 51 New 'Dirty List' of slave labor includes 5 JBS suppliers and 13 mining sites. Available at: <https://reporterbrasil.org.br/2023/10/nova-lista-suja-do-trabalho-escravo-traz-5-fornecedores-da-jbs-e-13-garimpos/>
- 52 Agência de Defesa Agropecuária do Estado do Pará. Available at: <https://lookerstudio.google.com/u/0/reporting/69ee14b8-baa2-4af0-bd80-c1b4fb2e66d2/page/67tZE>. Consulted in July.
- 53 Brazil is a signatory to ILO Convention 182, known as the Convention on the Worst Forms of Child Labor. It has been implemented in the country since Decree 6481 of 12 June 2008, which lists the activities prohibited for minors under 18. Available at: https://www.planalto.gov.br/ccivil_03/_ato2007-2010/2008/decreto/d6481.htm and https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_decl_fs_46_en.pdf
- 54 https://www.planalto.gov.br/ccivil_03/_ato2004-2006/2004/dnn/dnn10338.htm
- 55 <https://g1.globo.com/ma/maranhao/noticia/2022/06/08/mpf-pede-a-retomada-de-processo-para-expulsar-nao-indigenas-na-terra-krikati-no-maranhao.ghtml>
- 56 <https://cimi.org.br/2022/06/processo-de-desintrusao-da-terra-indigena-krikati-ganha-forca-apos-pedido-de-eliminar-do-mpf-ma/>
- 57 In July 2024, an interministerial ordinance determined that individuals or companies included on the Dirty List can be removed from it and added to the CEAC. To do so, they must sign TACs or judicial agreements with the federal government, committing to fulfil a series of duties and pay compensation to workers. Updated in September 2024, Ordinance 18/2024 is signed by the Ministry of Labor and Employment, the Ministry of Human Rights and Citizenship, and the Ministry of Racial Equality. More information at: <https://reporterbrasil.org.br/2024/07/para-sair-da-lista-suja-escravagistas-terao-que-indenizar-trabalhadores/>.
- 58 Report: "A farra do boi na Amazônia". Greenpeace Brasil. Available at: <https://www.greenpeace.org/static/planet4-brasil-stateless/2018/07/FARRAweb-alterada.pdf>
- 59 In order to unify the evaluation process for each meatpacker, the Joint Protocol for Monitoring Cattle Suppliers in the Amazon was developed in 2020 by the Federal Prosecution Service with technical support from the organization Imaflora. The protocol provides guidelines for implementing the Public Livestock Commitment and the TACs signed between the MPF and meatpacking companies in the Amazon. The protocol sets 11 criteria to ensure compliance with the TACs, standardizing monitoring requirements for all companies that have signed the agreement, cross-referencing several databases such as geospatial images of properties, public lists of areas embargoed by IBAMA, employers included on the Dirty List, documents such as CARs and GTAs, and declared cattle productivity. More information at: <https://www.boinalinha.org/wp-content/uploads/2025/03/Protocolo-Monitoramento-Gado-2ponto0-w5111720-ALT22-WEB.pdf>
- 60 The Meat TAC is based on Brazil's Environmental Crimes Act (Law 9605/1998), which provides for companies' joint liability for socio-environmental violations in their supply chains. Available at: <https://amigosdaterra.org.br/wp-content/uploads/2025/08/DE-OLHO-NO-TAC-.pdf>
- 61 <https://oglobo.globo.com/economia/noticia/2025/05/14/frigorificos-em-acordo-com-mpf-compraram-so-4percent-da-carne-de-areas-desmatadas-da-amazonia-contra-54percent-dos-outros.ghtml>
- 62 https://www.boinalinha.org/2ciclo_15mai25/
- 63 https://www.boinalinha.org/2ciclo_15mai25/
- 64 Ibid.
- 65 The audits covered suppliers who made sales to direct suppliers between January 2020 and December 2021. Available at: <https://amigosdaterra.org.br/wp-content/uploads/2025/08/DE-OLHO-NO-TAC-.pdf>
- 66 <https://amigosdaterra.org.br/wp-content/uploads/2025/08/DE-OLHO-NO-TAC-.pdf> p. 35
- 67 Brazil already has a cattle and buffalo tracking and identification system, the Brazilian Cattle and Buffalo Identification and Certification System (Sistema Brasileiro de Identificação e Certificação de Bovinos e Bubalinos, SISBOV). However, it is only required for producers and meatpackers that export to specific markets, such as the European Union. For other producers, joining the system is voluntary. Available at: <https://www.gov.br/agricultura/pt-br/assuntos/sanidade-animal-e-vegetal/saude-animal/cgtqa/dpc/sisbov>
- 68 <https://www.adepara.pa.gov.br/node/397>
- 69 <https://reporterbrasil.org.br/2025/08/rastreamento-gado-para-lentamente-metas-ambientais/>
- 70 <https://www.gov.br/agricultura/pt-br/assuntos/noticias/ministro-favaro-lanca-plano-nacional-de-identificacao-individual-de-bovinos-e-bufalos>
- 71 <https://reporterbrasil.org.br/2023/07/como-orgaos-publicos-dificultam-o-acesso-a-informacoes-sobre-o-caminho-do-gado/>

- 72 https://www.mpf.mp.br/atuacao-tematica/ccr4/dados-da-atuacao/grupos-de-trabalho/amazonia-legal/transparencia-das-informacoes-ambientais/docs-recomendacoes/Recomendacao_ADEPARA.pdf
- 73 <https://www.mpf.mp.br/pa/sala-de-imprensa/noticias-pa/justica-federal-acata-pedidos-do-mpf-e-obriga-adepara-a-publicar-dados-detalhados-sobre-gtas>
- 74 Ibid.
- 75 <https://beefpoint.com.br/mpf-recorre-e-pede-que-para-volte-a-publicar-dados-sobre-pecuaria/>
- 76 <https://beefpoint.com.br/mpf-recorre-e-pede-que-para-volte-a-publicar-dados-sobre-pecuaria/> / <https://globo.rural.globo.com/pecuaria/noticia/2025/02/mpf-recorre-e-pede-que-para-volte-a-publicar-dados-sobre-pecuaria.ghml>
- 77 <https://cnabrazil.org.br/storage/arquivos/pdf/AgendaLegislativa2025pdf.pdf> (p. 38)
- 78 Data available on the Environmental Regularization Panel of the Brazilian Forest Service. Available at: <https://www.gov.br/florestal/pt-br/assuntos/regularizacao-ambiental>
- 79 2023 Municipal Livestock Survey by the IBGE. Available at: <https://sidra.ibge.gov.br/tabela/3939#resultado>.
- 80 More information at: <https://www.secom.mt.gov.br/w/sema-discute-nova-modelagem-de-car-digital-com-representantes-de-sindicatos-rurais> and <https://sistemafamato.org.br/wp-content/uploads/2025/06/Informativo-SIMCAR-1.pdf>
- 81 <https://www.secom.mt.gov.br/w/sema-discute-nova-modelagem-de-car-digital-com-representantes-de-sindicatos-rurais>
- 82 More information at: <https://conectas.org/noticias/entenda-o-que-e-devida-diligencia-em-direitos-humanos/>
- 83 https://www.fairlabor//.org/wp-content/uploads/2025/05/FLA_Leather-Study-Brazil-Report.final_.pdf
- 84 Ibid.
- 85 Bill 572/2022 proposes the creation of a National Framework on Human Rights and Business, establishing guidelines for companies to identify, prevent, and mitigate negative impacts on human rights arising from their activities. Available at: https://www.camara.leg.br/proposicoesWeb/prop_mostrarintegra?codteor=2148124&filename=PL%20572/2022.
- 86 https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en
- 87 Available at: https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en / <https://www.dw.com/pt-br/como-lei-antidesmatamento-da-ue-pode-ajudar-a-salvar-florestas-do-mundo/a-69549058>
- 88 Available at: https://www.agrolink.com.br/noticias/ue-adia-regras-para-importacao-de-produtos-agricolas_499413.html / <https://valor.globo.com/agronegocios/noticia/2024/11/14/parlamento-europeu-decide-adiar-lei-antidesmatamento-por-um-ano.ghml>
- 89 Ibid.

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