

Global Witness wrote to the following companies to seek their comments before this publication but didn't get a response by the given deadline.

- The Industrial and Commerce Bank of China
- The Bank of China
- ZTE
- Tianjin Julong
- COFCO

Global Witness has collected previous responses by the companies named in the report. They are presented here:

- Wilmar

In a 2018 [publication](#) "Rogue Trader: Keeping deforestation in the family", Greenpeace's analysis of trade data shows that Wilmar continues to trade palm oil from Gama to many of the world's biggest brands, despite being aware that Gama was violating Wilmar's NDPE policy by clearing rainforest. In response, Wilmar denies having any influence over Gama, a company Greenpeace found to have caused a large amount of deforestation. Wilmar admitted though Gama is run by Wilmar senior executives.

- ADM and Bunge

Responding to allegations by Global Witness in its [publication](#) in 2020, "Trading Risks: How ADM & Bunge are failing Land & Environmental Defenders in Indonesia", ADM rejected Global Witness' evidence base and our analysis of their due-diligence process. However, ADM investigated all mills identified in this report as linked to land and human rights abuses. ADM replied to Global Witness that it would be monitoring 9 mills identified in our report and continuing investigations on a further 36 mills. It closed investigations or otherwise declined to investigate the remaining mills. Bunge acknowledged that the alleged incidents were in Bunge's indirect supply and reiterated that the company includes credible instances of human rights violations in its grievance list for engagement.

- JBS

Responding to allegations by Global Witness in its [publication](#) in 2020 "Beef, Banks and the Brazilian Amazon", JBS justified their purchases from the ranches and denied any wrongdoing, which Global Witness in turn disputed (see [this link](#) for more details).

- COFCO, Cargill, Bunge, LDC and ADM

According to Mighty Earth, the five companies made responses to their investigation published on April 29, 2021. Global Witness has seen a copy of Mighty Earth's compilation of these responses. According to this:

- COFCO responded to 5 of the 17 alleged forest clearance or fire incidents. It disputed 4 of these cases, where COFCO claims it is not linked to the clearance either because it does not source directly from that property or from the supplier who may own multiple properties. For one additional case, COFCO says it is engaging with the farmer to verify Mighty Earth's allegation.

- Cargill responded to 19 of the 27 alleged forest clearance or fire incidents. Across these 19 cases, Cargill claims it either does not directly or indirectly have suppliers in their supply chain; it does not buy directly from the supplier that owns the property; or it does not buy directly from the property. In other cases, it states that when they established a business relationship with the producer it did not find an indication of illegal activity.
- Bunge responded to 8 out of 27 alleged forest clearance or fire incidents. The company said it is connected to all these 8 farms either by its own direct purchases or through suppliers who purchase from the property. Still, in 3 cases, while it observes that deforestation has taken place, it states that no soybean cropping has been in place over the newly deforested sites.
- LDC responded to 7 out of the 20 alleged forest clearance or fire incidents. For four farms linked to forest clearance or fire incidents, the company said only one is in its supply chain. In the other three cases, LDC said the company has no commercial relationship with the suppliers.
- ADM didn't respond to the five alleged forest clearance incidents.