

Rt Hon Boris Johnson MP,  
Prime Minister  
10 Downing Street  
London SW1 2AA

cc Rt Hon George Eustice MP, Secretary of State for Environment, Food and Rural Affairs  
cc Rt Hon The Lord Goldsmith, Minister for Pacific and the Environment  
cc Rt Hon Kwasi Kwarteng MP, Secretary of State for Business, Energy and Industrial Strategy  
cc Rt Hon Alok Sharma, President COP26

5 September 2021

Dear Prime Minister,

The Amazon is under unprecedented attack. Agricultural expansion is once again driving burning. 2021 has seen some of the worst fires in history, with potentially catastrophic consequences for the integrity of the Amazon biome and the survival of its Indigenous Peoples. In Brazil, the Congress is currently considering new legislation that would legalise illegal land grabbing in the Amazon. The destruction of the Amazon has dire implications for global efforts to avoid dangerous climate change but there is much the UK can still do. On World Amazon Day, we are writing to you as a coalition of NGOs, Indigenous Peoples' groups, scientists, and academics, to ask that your Government take urgent action.

In the Environment Bill, your Government has proposed a legal framework to address the overseas deforestation footprint of the UK's consumption of 'forest risk commodities' such as soy, beef, palm oil, cocoa, coffee and rubber. While a welcome step forward, this proposal has several major gaps that limit its potential, and does not align with the recommendations set out by the Global Resource Initiative. We call on the Government to amend the Environment Bill to strengthen its proposal on due diligence requirements for forest risk commodities by:

- ensuring that UK forest risk commodity supply chains are not complicit in any form of deforestation – not just deforestation which is defined as illegal under producer country laws;
- addressing the role of UK finance in deforestation;
- ensuring UK businesses act in accordance with the rights of Indigenous Peoples and local communities as set out under international law;
- strengthening the review mechanism to ensure that the due diligence framework, its implementation, and enforcement are progressively improved;
- adopting a requirement to introduce a target to significantly reduce the UK's global environmental footprint by 2030.

(See annex for more detail)

Halting agricultural expansion into the world's remaining forests and natural ecosystems is essential to meet the 1.5°C climate target, as well as to halt and reverse biodiversity loss. As the IPCC's recent report makes clear, we are running out of time to prevent irreversible and dangerous climate change. This makes it even more important that world governments act now. Ahead of the UN climate conference in November, we need urgent action, not just warm words.

As President of COP26 and host of the conference, the UK has a unique opportunity to demonstrate global leadership and play an exceptionally important role in setting the global environmental agenda. The UK can also have a big impact as a major consumer and financier of forest risk commodities. Given the dangerous legal reforms being pushed through the Brazilian Parliament and their dire implications for the future of the Amazon and its Indigenous Peoples, it is imperative that the UK Government reassesses its current approach and takes the bold action necessary. We are calling on your Government to make use of its world-leading position and take action to protect the Amazon and other climate-critical forests around the world.

Yours sincerely,

1. Christine Allen, Director, CAFOD
2. Amigos da Terra - Amazônia Brasileira
3. Articulação Rosalino Gomes de Povos e Comunidades Tradicionais do Norte de Minas
4. Sue Branford, Editor, Latin America Bureau
5. Dr Josh Brem-Wilson, Centre for Agroecology, Water and Resilience, Coventry University, UK.
6. Pedro Bruzzi Lion, Executive Superintendent, Fundação Pró Natureza - Funatura
7. Abi Bunker, Woodland Trust
8. Mercedes Bustamante, The Brazilian Science and Society Coalition
9. Dr. Robert Coates, Assistant Professor | Sociology of Development and Change (SDC) group, Wageningen University, Netherlands
10. Anna Collins, Coordinator, UK NGO Forest Coalition
11. Barbara Davies-Quy, Deputy Director, Size of Wales
12. Mike Davis, CEO, Global Witness
13. Mark Dearn, Director, Corporate Justice Coalition
14. Maria do Socorro Teixeira Lima and Kátia Favilla, Rede Cerrado
15. Faith Doherty, Forests Campaign Leader, Environmental Investigation Agency
16. Maiara Folly, Co-founder and Programme Director of Plataforma CIPÓ
17. Michael Gidney, Chief Executive, Fairtrade Foundation
18. Tom Griffiths, Coordinator – Responsible Finance Programme, Forest Peoples Programme
19. Antonio Guerreiro, Departamento de Antropologia, IFCH CPEI - Centro de Pesquisa em Etnologia Indígena, Universidade Estadual de Campinas
20. Nick Hesterberg, Executive Director, Environmental Defender Law Center
21. Liz Hosken, Director, The Gaia Foundation
22. Instituto Centro da Vida (ICV), Brazil
23. Rodrigo Junqueira, Executive Secretary, Instituto Socioambiental
24. Dr Anna Laing, Lecturer in International Development (Geography), University of Sussex
25. Matt Leggett, Associate Director, Wildlife Conservation Society
26. Dr Jerome Lewis, Director, Centre for the Anthropology of Sustainability (CAoS), University College London
27. Professor Simon Lewis, Chair of Global Change Science, University College London

28. Gustavo B. Malacco, Associação para a Gestão Socioambiental do Triângulo Mineiro (Angá)
29. Professor Mark Maslin FRGS FRSA, Department of Geography, UCL
30. Niki Mardas Executive Director, Global Canopy
31. Dr Georgina McAllister, Asst. Prof. in Stabilisation Agriculture, Centre for Agroecology, Water & Resilience, Coventry University
32. Carina Millstone, Executive Director, Feedback
33. Dr. Nina Isabella Moeller, Associate Professor of Political Ecology and People's Knowledge, Centre for Agroecology, Water and Resilience (CAWR), Coventry University
34. Hannah Mowat, Campaigns Coordinator, Fern
35. Observatorio do Clima, Brazil
36. Lucia Ortiz, President, Amigos da Terra Brazil
37. Professor Oliver Phillips FRS, Chair in Tropical Ecology, University of Leeds
38. Silvia Quiroa, Amigos de la Tierra América Latina y el Caribe (ATALC) Executive Committee
39. Mark Rose, Chief Executive Officer, Fauna & Flora International
40. Yuri Salmona, Instituto Cerrados
41. John Sauven, Greenpeace
42. Maria Marlene Soares Nunes, President; and Avilmaura Ferreira dos Santos, First Treasurer; Núcleo Gestor da Cadeia Produtiva do Pequi e Outros Frutos do Cerrado (Núcleo do Pequi)
43. Richard Solly, Co-ordinator, London Mining Network
44. Beccy Speight, CEO, RSPB
45. Tanya Steele, Chief Executive, WWF
46. Heather Stevens, Chair of Trustees, Waterloo Foundation,
47. James Thornton, CEO, Client Earth
48. Steve Trent, CEO, Environmental Justice Foundation
49. Miriam Turner and Hugh Knowles – Co-Executive Directors, Friends of the Earth England, Wales and Northern Ireland
50. Hein van der Voort, Museu Paraense Emílio Goeldi, Belém, Brazil
51. Barbara Van Dyck, Associate Professor, Coventry University
52. Fábio Vaz, Instituto Sociedade, População e Natureza (ISPN)
53. Professor Peter Wade, Social Anthropology, University of Manchester

### **Annex: our key asks for the UK Environment Bill**

#### **Excluding all deforestation from UK supply chains for key commodities**

It is welcome that the UK Government has responded to the problem of global deforestation by introducing a due diligence requirement for forest risk commodities in the Environment Bill, and by working with producer countries on initiatives such as the FACT dialogues. However, the Government's current proposal to restrict due diligence to illegal deforestation doesn't go far enough to address the issue. Deforestation has the same often disastrous impacts regardless of whether local laws treat it as legal or illegal, and UK consumers want to be confident that their weekly groceries aren't contributing to land-grabbing or ecosystem

destruction. As an example an illegal-only approach risks an endorsement of the Brazilian government's programme to legalise the deforestation of vast tracts of the Amazon rainforest, and would allow products derived from that deforested land to still be sold in UK supermarkets. Any commodities or derivatives that cannot be proven to be free from deforestation and human rights abuses should not be allowed to be placed on the UK market.

### Addressing the role of UK finance

Just as UK consumption plays a significant role in deforestation and land-use change around the world, UK financial institutions play a critical role in bankrolling global deforestation. Between 2013 and 2019, these institutions financed six agribusiness companies linked to deforestation in climate-critical forests [to the tune of £5 billion](#), making the UK their largest source of international credit. UK-based financial institutions should not provide financial services to commercial enterprises engaged in the production, trade, transport, or use of commodities linked to deforestation.

### Protecting the rights of Indigenous Peoples and local communities

A fundamental step in the fight against global deforestation is to recognise, respect and protect the rights of Indigenous Peoples and local communities. 45% of intact forest in the Amazon lies within Indigenous-occupied land. The Government's proposed Environment Bill must therefore also include a requirement that UK businesses respect provisions to protect the rights of Indigenous Peoples and other communities. Protecting these rights is the [most effective and ethical way to tackle deforestation](#). Requiring businesses to ensure that their supplies of forest risk commodities have not been produced without having obtained the free, prior and informed consent (FPIC) of affected Indigenous Peoples in accordance with their rights under international law, and of other local communities with customary tenure rights, has long been recognised as central to safeguarding forests. By adopting a clear and universal requirement to respect the rights of local peoples with an FPIC provision, the UK also provides certainty and consistency for business, particularly where legal requirements to respect rights in producer countries are weak, poorly enforced, or are actively being dismantled, as they are in Brazil.

### Strengthening the review mechanism

To ensure the new UK forest risk commodities framework is truly world-leading, an effective means of reviewing the legislation and strengthening it over time is essential. To this end, the review procedure must meet basic criteria on quality, transparency and independence, and a clear process to address any weaknesses that are identified by a review (such as which commodities are in scope and which businesses are covered) must be spelled out. As the Government's GRI taskforce recognises, a focus on the environmental and human rights impacts of forest loss and land conversion linked to the production of beef and leather, cocoa, palm oil, pulp and paper, rubber, soya and timber, should be a first step, with the lessons extended to other commodities, for example mining – a major cause of deforestation.

## Including a global footprint target

The Environment Bill should include a requirement for the UK Government to set a target to significantly reduce the UK's global environmental footprint of consumption and production by 2030. The UK has a real opportunity to show global leadership in addressing the climate and nature crisis by being the first in the world to embed the ambition of the Leaders' Pledge for Nature in legislation, and aligning our domestic and international ambition ahead of both COP26 and CBD COP15. Establishing a global footprint target would play a critical role in driving efforts to reduce the impact of the UK's consumption and production on forests around the world.

