



DUH Feed Radar

First aid for tropical forests: Deforestation-free palm oil and soy feed in Germany's stables

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1. Results table for the 68 companies (short version)

(Table available for download at <https://www.duh.de/futtermittel-radar/>)

DUH Feed Radar: Deforestation-free animal feed!



















Palm oil and soy from sustainable, deforestation-free cultivation without environmental pollution and human rights violations

Table 1: Legend for the evaluation of company information on existing provisions or intentions, to use sustainably certified and deforestation-free as well as European animal feed in livestock farming.

	Evaluation criteria
	It is stated that there has already been a switch to 100% sustainably certified palm oil or soy feed or alternatively completely to European feeds.
	A cut-off date is given for the use of only sustainably certified palm oil or soy feeds or for the complete switch to alternative European animal feeds. (Deadline for sustainable palm oil no later than 1.1.2022 and for sustainable soy no later than 1.1.2023).
	It is stated that sustainably certified palm oil or soy or European animal feeds are endorsed or partly used – without specifying a cut-off date for the switch to 100%.
	It remains intransparent whether a switch to exclusively sustainably certified palm oil and soy feed or the increased use of alternative European animal feeds is being pursued and implemented.
	The company responded to DUH's request and contributed information.

Status of the evaluation: 26.01.2022 (1st update)



































Table 2: Evaluation of the existing provisions or intentions of 68 companies along the animal products supply chain to switch to palm oil and soy feeds from sustainable, deforestation-free cultivation and to use alternative European feeds.

Companies		Positions on the use of 100% sustainable palm oil and soy feed:		Positions on the use of alternative, European feed:	
		Concerning sustainable palm oil	Concerning sustainable overseas soy	Substitution of palm oil with e.g. rapeseed or sunflower oil	Replacement of overseas soy with e.g. European soy, field bean, lupin
<i>Feed producers, *partly only processing and trading companies (12 companies)</i>					
Deutsche Tiernahrung Cremer					
BEWITAL agri					
Agravis Raiffeisen					
Heinrich Nagel			No use of soy components		No use of soy components

Companies		Positions on the use of 100% sustainable palm oil and soy feed:		Positions on the use of alternative, European feed:	
		Concerning sustainable palm oil	Concerning sustainable overseas soy	Substitution of palm oil with e.g. rapeseed or sunflower oil	Replacement of overseas soy with e.g. European soy, field bean, lupin
<i>Feed producers, *partly only processing and trading companies (12 companies)</i>					
GS agri	✉	●	●	●	●
Hauptgenossenschaft Nord	✉	●	●	●	●
H. Bröring	✉	●	●	●	●
PHW Gruppe (incl. Mega Tierernährung and Wiesenhof)	✉	●	●	●	●
BayWa	✉	No palm oil products are traded	●	No palm oil products are traded	●
Cefetra Group (Baywa subsidiary)	✉	●	●	●	●
Volac Wilmar Feed Ingredients Holdings Limited	✉	●	Soy is not processed or traded	●	Soy is not processed or traded
ADM Animal Nutrition		●	●	●	●
<i>Meat processing (partly incl. animal husbandry) (7 companies)</i>					
Danish Crown	✉	●	●	●	●
Wiesenhof (subsidiary of the feed producer PHW Group)	✉	●	●	●	●
Tönnies		●	●	●	●
Westfleisch	✉	●	● (Second query round, status January 2022)	●	●
Rothkötter Gruppe (incl. Rothkötter Mischfutterwerke)		●	●	●	●
Sprehe Feinkost		●	●	●	●
Vion N.L.		●	●	●	●
<i>Poultry industry (small selection of laying hen farmers and egg product manufacturers) (8 companies)</i>					
Biovum incl. Eggerhof (BioRegio business)	✉	The feed contains no palm oil	No use of overseas soy	●	●
Vriesen-Hof	✉	The feed contains no palm oil	●	●	●
Gutshof-Ei	✉	The feed contains no palm oil	●	●	●
Geflügelhof Onken		●	●	●	●

Companies		Positions on the use of 100% sustainable palm oil and soy feed:		Positions on the use of alternative, European feed:	
		Concerning sustainable palm oil	Concerning sustainable overseas soy	Substitution of palm oil with e.g. rapeseed or sunflower oil	Replacement of overseas soy with e.g. European soy, field bean, lupin
Poultry industry (small selection of laying hen farmers and egg product manufacturers) (8 companies)					
Hühnerhof Heidegold		●	●	●	●
OVOBEST Eiprodukte		●	●	●	●
Eifrisch Vertriebsgesellschaft		●	●	●	●
Schukarle-Hof		●	●	●	●
Dairy industry (incl. dairies and dairy farming) (10 companies)					
Hochland Deutschland	✉	Feed used contains no palm oil	Feed used contains no soy	●	●
Friesland Campina Germany	✉	Feed used contains no palm oil	Feed used contains no soy	●	●
Arla Foods	✉	●	●	●	●
Zott	✉	●	●	●	●
Deutsches Milch Kontor		●	●	●	●
Hochwald		●	●	●	●
Fude & Serrahn Milchprodukte		●	●	●	●
MEGGLE		●	●	●	●
Bayernland		●	●	●	●
Unternehmensgruppe Theo Müller		●	●	●	●
Food retail (> 1 billion sales in 2018) (18 companies)					
Lidl Deutschland	✉	●	●	●	●
Kaufland	✉	● (Checking the active conversion, status January 2022)	● (Switch of some goods from 1.1.22, concretization expected for 2023, status January 2022)	●	●
ALDI incl. ALDI NORD and ALDI SÜD	✉	●	●	●	●
REWE Group incl. Penny	✉	●	●	●	●

Companies		Positions on the use of 100% sustainable palm oil and soy feed:		Positions on the use of alternative, European feed:	
		Concerning sustainable palm oil	Concerning sustainable overseas soy	Substitution of palm oil with e.g. rapeseed or sunflower oil	Replacement of overseas soy with e.g. European soy, field bean, lupin
<i>Food retail (> 1 billion sales in 2018) (18 companies)</i>					
EDEKA	✉	●	●	●	●
Netto	✉	●	●	●	●
Metro-Gruppe (incl. Rungis express)	✉	●	●	●	●
dm	✉	Feed used contains no palm oil	Feed used contains no soy	●	●
Rossmann	✉	●	●	●	●
Globus	✉	●	●	●	●
Bartels-Langness-Gruppe (incl. famila, MARKANT, Citti)		●	●	●	●
Transgourmet Deutschland (part of the Coop Group)	✉	●	●	●	●
Norma	✉	●	●	●	●
Bünting (incl. Combi, famila, Markant Nordwest)	✉	●	●	●	●
tegut...	✉	●	●	●	●
Dennree Gruppe (incl. Denny BioMärkte)	✉	Feed used contains no palm oil	●	●	●
Dohle (incl. Hit and other Dohle members)		●	●	●	●
Müller (Drugstore)		●	●	●	●
<i>System gastronomy and fast food (13 companies)</i>					
Block Gruppe	✉	●	●	●	●
McDonald's Corporation	✉	●	●	●	●
Ikea Deutschland	✉	●	●	●	●
Autobahn Tank&Rast	✉	●	●	●	●
Nordsee	✉	●	●	●	●

Companies		Positions on the use of 100% sustainable palm oil and soy feed:		Positions on the use of alternative, European feed:	
		Concerning sustainable palm oil	Concerning sustainable overseas soy	Substitution of palm oil with e.g. rapeseed or sunflower oil	Replacement of overseas soy with e.g. European soy, field bean, lupin
System gastronomy and fast food (13 companies)					
Yum! Brands Restaurants Int. (e.g. KFC, Pizza Hut)		 (On the part of KFC new commitment to the 100% target – so far without a binding target date, as of January 2022)			
Subway			 (New commitment to the 100% target – so far without binding target date, Status January 2022)		
Burger King					
FR L'Osteria					
Vapiano					
Lufthansa Service Gesellschaft					
Domino's Pizza Deutschland					
Valora Foodservice Deutschland (e.g. Backwerk, Ditsch)					

2. Summary

Deutsche Umwelthilfe (DUH) for the first time calls on 68 companies along the supply chain of animal products to ensure only sustainably certified, deforestation-free palm oil and soy feed in animal husbandry as soon as possible, as well as to specify the increased use of domestic feed alternatives. For this purpose, companies from the feed industry, trade and gastronomy were surveyed as part of the Feed Radar. Palm oil and soy from uncontrolled, risky cultivation conditions with increased risk for the destruction of valuable ecosystems and human rights violations must be excluded from the production of feed for livestock farming. There still is massive destruction of tropical rainforests and savannahs along the equator in order to establish new plantations across Asia, Africa and South America, further fuelling the climate crisis. The demanded switch to sustainably certified overseas goods has to be seen as a minimum measure for the protection of climate-relevant and species-rich ecosystems, as new clearings are prohibited in certified cultivation and the goods therefore only come from long-established cultivation areas. This is a start, but the switch to domestic, European feed and space-dependant animal husbandry must also be pursued in parallel: Animal numbers and the consumption of animal products should be gradually reduced to a level that is compatible with nature and does not involve environmentally harmful imports. For the time being, the Feed Radar provides a first overview of which companies want to commit to rainforest protection by means of concrete immediate measures.

The German government's target to switch to sustainable, deforestation-free palm oil and soy by 2020, which was agreed upon with the signing of the Amsterdam Declaration in 2015, was only voluntary in nature and was missed: in 2019, only an estimated 83% of the palm oil consumed in Germany was sustainably certified (Meo Carbon Solutions, 2020). Especially in the livestock feed sector,

the share of sustainably certified palm oil has stagnated at only 25% since 2017. For soy, the certified deforestation-free share was around 22% in 2018.

The procedure

The failure to switch to 100% certification share can be attributed to the unwillingness of feed suppliers, but also to downstream companies looking the other way along the rest of the supply chain. The consumption of meat, eggs and dairy products must not continue to contribute to the destruction of climate-relevant ecosystems and undermine ongoing climate protection efforts. The responsibility lies with all companies that profit significantly from animal products. Therefore, DUH **randomly selected 68 companies along the supply chain of animal products** and asked them for statements and new voluntary commitments to 100% sustainable palm oil and soy feed and the increased use of domestic alternatives in the period April to July 2021 (a second query followed end of 2021). The companies surveyed come from six sectors of the economy:

- **Feed industry:** Importers or single and compound feed producers
- **Meat industry:** Companies that distribute their own brands and produce private labels e.g. for retailers and wholesale
- **Dairy industry:** Cooperative dairies and brand producers
- **Laying hen farmers** and egg product manufacturers
- **Food retail and wholesale**
- **System gastronomy:** fast-food chains or quick-service restaurants

The result: Courageous advances by only some companies and too much inert mass

A response rate of 62% was achieved (42 out of 68 companies). This number is very high, so that the feed issue can definitely be classified as a central topic of sustainable corporate policy. **In the second query round at the end of 2021, 20 responses were received - but mostly without announcing any new progress: Only one new voluntary commitment with a specific deadline was submitted - on deforestation-free soy from 1.1.2023 (see Westfleisch).**

Green rated: The frontrunners – clear positioning against new rainforest destruction due to palm oil or overseas soy

- Only four **companies** claim to **already** use **100% sustainable palm oil or overseas soy feed**. Only one out of these four states to use only sustainably certified palm oil in its feed:
 - Palm oil: **Deutsche Tiernahrung Cremer** (feed producer)
 - Soy: **Arla Foods** (milk), **Gutshof-Ei** (egg), **Wiesenhof** (meat)
- **Ten** companies state that they **no longer use palm oil or overseas soy** in their feed at all:
 - No palm oil feed: **dm** (drug store), **Dennree Group** (organic market), **Vriesen-Hof** (egg), **Gutshof-Ei** (egg), **Biovum with Eggerhof** (egg), **BayWA AG** (feed supplier), **Hochland Germany** (milk), **Friesland Campina Germany** (milk)
 - No overseas soy feed: **Biovum with Eggerhof** (egg), **Hochland Group** (milk), **Friesland Campina** (milk), **Heinrich Nagel and Volac Wilmar Feed Ingredients** (feed producers and suppliers).

Yellow rated: The laggards – First aid for the rapid exclusion of new forest clearings

- Palm oil: **Four companies** have committed themselves to **100% sustainable palm oil from 1st January 2022** across all product groups: **Lidl Deutschland** (retail), **BEWITAL agri** and **AGRAVIS Raiffeisen** (both feed suppliers). The Danish meat processor **Danish Crown** will switch to sustainable palm oil, halve the amount of palm oil in its feed in 2022 and completely eliminate palm oil in its feed from 2023 onwards. In the second round of enquiries, **not a single other company** committed to **deforestation-free, sustainably certified palm oil from 1.1.2022** by stating a clear target date.

This reveals once again that a future legal regulation against imported deforestation at European and German level should cover all processing stages of palm oil and soy. If this does not happen, there most likely will always be companies that refuse to impose deforestation-free requirements on upstream suppliers and processed products.



- Soy: Only one company has **newly committed** to **100% sustainable overseas soy** across all product groups **already from 1.1.2023**: the food retailer **Lidl Germany** (the commitment first only applies to the German market). However, in the second round of enquiries in November 2021, the meat processing company **Westfleisch** came up with a commitment, too. The company is working together with QS GmbH¹ on passing on and complying with a binding supplier requirement for deforestation-free soy from 1.1.2023 – with the possibility of including requirements for palm oil in the management system, too. **Meat processors and food companies from the retail and wholesale sectors should make use of this new tool as soon as possible and not wait to insist on sustainably certified, deforestation-free palm oil and soy feed. The feed industry is equally responsible for quickly adapting its raw material procurement accordingly in the beginning of 2022.**

¹ QS short portrait (2021): "QS is the leading standard for food safety in Germany. 95% of fresh pork and poultry, 85% of beef and 90% of fruit, vegetables and potatoes from Germany are QS certified. The aim is to confirm consumer confidence in safe fresh food on a daily basis."

- **Lidl Germany** is thus **the most ambitious company in the food trade** due to its early target years for both certified deforestation-free palm oil and soy. **Lidl** is also the only food retailer that states that it **also checks third-party brands with** regard to deforestation-free palm oil and soy and reserves the right to impose sanctions. In the second round of enquiries, **Kaufland** informed DUH that it would create binding requirements for sustainable, deforestation-free certified soy from 2022 onwards with a new soy guideline and that it would also expand its corporate due diligence obligations. The position paper on sustainable soy in animal feed has been available for download since the end of January². The target date from which all commodity groups with animal products will be converted and which countries this will ultimately include will be specified by Kaufland in the course of 2022 (as of January 2022).

Orange rated: The hesitant – Late or partial exclusion of potential forest clearings

- Seven companies still favor later action and want to ensure **100% sustainable palm oil or overseas soy feed** across all commodity groups **by 2025** – related to the German market, the DACH region or internationally. Thus there are still considerable differences in the planned efforts:
 - Palm oil: feed producer **Heinrich Nagel** by 2025 in the DACH region – even later on the international market, **IKEA Germany** by 2025 worldwide (for poultry in the EU, CAN and AUS already by the end of 2021)
 - Soy: feed producer **Deutsche Tiernahrung Cremer** by 1.1.2025 at all production sites, **Hauptgenossenschaft Nord** by 2025 all soy imported by the group, **Danish Crown** at all Danish production sites, **ALDI SÜD and ALDI NORD** by 31.12.2025 on the German market (as of January 2022), **IKEA** by

2025 for all product groups worldwide. A complete switch to deforestation-free palm oil and soy feed only by 2025 seems to be a start, but is too late in view of the climate and biodiversity crisis. **DUH continues to call for a switch to deforestation-free, sustainable feed as soon as possible during 2022.**

- Some companies achieve **at least a partial conversion** for soy **before 2025** (examples): **ALDI SÜD and ALDI NORD** state that they will achieve 60% of soy feed sustainably certified for poultry, beef, pork and shell eggs from 1.1.2022 (applies to the German market). **REWE** says it is already achieving 100% sustainable soy feed in fresh meat products, eggs and milk by 1.1.2021.³ **IKEA Germany** has already switched for meatballs, sausages and salmon, and will achieve this for poultry by 2021 in the EU, Canada and Australia.
- **Other companies** were rated orange if they have switched to sustainable, deforestation-free soy in **sub-segments of their product range** or on the basis of **pilot projects**, or if they are beginning to address the issue and start supplier discussions on palm oil or soy feed (see long version of the results table in chapter 6).

Orange or red rated: Limited commitment to date to exclude new clearing or missing information by traders and other players

- **Two companies from feed trade** have expressed in their 2019 RSPO ACOP reports that they expect to achieve 100% sustainable palm oil only if there is sufficient customer demand: possibly by 2025 at **Cefetra Group** and by 2030 at **Volac Wilmar Feed Ingredients**.
- Up to now, **ADM Animal Nutrition** still only aims to achieve deforestation-free raw materials **by 2030** (including palm oil and soy). It already applies its own purchasing guidelines

² <https://unternehmen.kaufland.de/unsere-verantwortung/machen-macht-den-unterschied/lieferkette.html#richtlinien-positionen>

³ A changeover in the product groups non-fresh meat products (frozen, etc.), dairy products, butter and aquaculture products would therefore still be pending. A target date for the changeover has not yet been announced.

for sustainable palm oil, but it is not sustainably certified according to a certification system. Here, **Olenex** as the responsible operator of several European refineries of ADM and Wilmar is also responsible for clear targets.

- Besides IKEA and METRO, unfortunately **no other fast food chains and wholesalers** provided clear conversion data on 100% sustainable palm oil or soy feed. The response rate from **meat processors** and **brand manufacturers in the dairy sector** was also low. From the big names, such as **McDonald's, Vapiano, l'Osteria, Rothkötter, Tönnies, ALRA Foods** or **Müllermilch**, consumers would certainly have hoped for more concrete information and targets on the exclusion of deforestation for farm animal feed. However, some of the companies reacted to the DUH enquiry and stated that they take the issue seriously and signalled their intention to publish new targets in the near future.

Organic food on the rise: promoting domestic feeds

Many of the companies already partially promote organic food according to the EU organic regulation or the stricter association organic seals (Bioland, Naturland, demeter, etc.). In organic husbandry, organic feed must be used and a minimum proportion of domestic feed from the own farm or from the region is prescribed. For pigs and poultry, up to 5% conventional protein feeds (incl. soy) are still allowed. However, these are gradually being reduced. According to market studies by the Forum for Sustainable Palm Oil (FONAP), organic palm oil is not used in feed in Germany. So other vegetable oils from organic farming are used in organic feed production.

DUH demands on politics & economy

Our climate and the habitat of endangered species such as the orangutan must no longer be put at risk for the sake of big profits in the meat and milk business. Therefore, we call on politicians to introduce legal requirements as soon as possible and on companies to commit themselves to concrete measures already today. Companies shall act responsibly and present the implementation of their comprehensive measures publicly. The following measures should be vigorously pursued and implemented by policymakers and companies:

- » **As soon as possible, only sustainable, deforestation-free⁴ palm oil in animal feed – from 1.1.2022 at the latest – and, where possible, preference for domestic or European vegetable oils.**
- » **As soon as possible, exclusively sustainable, deforestation-free⁵ soy feed and a gradual increase in the share of European protein crops.**
- » **For the retail sector in particular: transform own brands and discontinue third-party brands that do not meet the requirements for sustainable, deforestation-free palm oil and soy supply chains, so that the assortment as a whole becomes deforestation-free.**
- » **Binding requirements for credible certification systems that safely exclude any destruction of carbon- or species-rich ecosystems in the tropics and beyond.**
- » **Import requirements that stop the import of unsustainable palm oil and soy products, including animal feed – as quickly as possible**

⁴ e.g. certified according to RSPO or an equivalent certification system; credits (book & claim goods) only as a transitional solution to physically certified goods (esp. SG).

⁵ e.g. certified according to one of the following or equivalent certification systems: ISCC + / ISCC EU, Donau Soja / Europe Soya, ProTerra, BFA SS, CRS-CEFETRA and RTRS; Credits (Book&Claim-Ware) only as a transitional solution to physically certified goods (esp. SG).

under an EU legislative framework⁶ or at national level if an ambitious agreement at EU level is not possible.

- » **Animal welfare in combination with a reduction of livestock** to an environmentally sound level⁷: Support German farmers – especially small and medium-sized farms – with **higher purchase prices** or financial assistance to make the switch to more sustainable feed and more environmentally sound, animal welfare-friendly livestock farming.
- » Turning away from the export orientation of German animal husbandry, especially in the meat and dairy industries, and instead **promoting plant-based milk and meat substitutes** at home and abroad.
- » **Increased transparency** – companies must publicly state exactly where all feed components come from, under what conditions it was produced and which sustainability standards and certifications are adhered to. To this end, existing **reporting obligations** on the processing of raw materials should also be adapted.
- » **Exerting trade pressure**: Governments of producing regions or countries that repeatedly reject offers of cooperation and compensation for rainforest protection that do not present alternative options or even actively promote forest destruction⁸ should ultimately be countered with temporary trade boycotts.

⁶ EU regulation against imported deforestation and EU supply chain law with environmental and human rights due diligence obligations

⁷ Gradual development towards land-based animal husbandry with fewer animals, reduced need for (imported) feed and the mitigation of the nitrogen problem by reducing the use of liquid manure in the fields and the associated nitrate input into groundwater and surface water.

⁸ For example, through legal or illegal activities of the forestry or agricultural industry, through urbanisation or other sectors.

3. Introduction

The consumption and export of conventional animal products has been driving the destruction of the last primary and semi-natural forests and ecosystems for decades. This is because new cultivable land is still being created for palm oil and soy from Southeast Asia and South America. In the process, carbon and biodiversity-rich forests, peatlands and savannahs are being destroyed, the preservation of which is of great importance against the progress of climate change and the dramatic decline in biodiversity. Such land use changes are now responsible for around eleven percent of global greenhouse gas emissions. Habitat loss also affects the last hotspots of enormous and unique biodiversity, e.g. in Indonesia, Brazil and Colombia. Alongside climate change, the progressive expansion of land use by humans is the biggest driver of global species extinction.

Millions of animals are kept in Germany for the production of meat, eggs, dairy products and. The number of fattening animals slaughtered in Germany already exceeded 760 million in 2019. Only the excessive number of farm animals in Germany makes the massive export of meat and dairy products possible in the first place. Feed can no longer be produced in sufficient quantities on domestic land. Therefore, animal feed components are massively imported nowadays – soy often from South America, palm oil from Southeast Asia. These ingredients are added to the industrial feed as cheap fat and protein to fatten the animals in a short time. The consumption of animal products in Germany is thus in **direct competition for land** for tropical ecosystems capturing highly endangered animal species.

While the approximately 150.000 tonnes of palm oil imported for animal feed can mainly be attributed to the lower price of palm oil compared to other vegetable oils – the approximately 3.2 million tonnes of soy meal fed annually in Germany (figures from 2019) do not seem to be easily replaceable by protein crops from Europe in these

enormous quantities at present. However, many consumers are not yet aware of the problem of feed imports and the associated deforestation of tropical forests, as the issue of sustainable feeding in livestock farming is only gradually becoming visible to the general public. It is only in the last few years that the reduction of meat consumption and the sustainable, deforestation-free feeding of farm animals have been increasingly discussed in the media.

The animal feed industry has the third largest share of German palm oil consumption – after the energy and food sectors. Since 2017, the animal feed sector has lagged behind the target set by the German government in 2014 to voluntarily switch to 100% sustainable, deforestation-free palm oil by 2020. While 90 % of palm oil used as an ingredient in food is already sourced from sustainably certified and deforestation-free cultivation, **the sustainable share of palm oil used in animal feed is only 25%. Overall across all sectors, Germany achieves 83% sustainable palm oil. For soy, the share of certified deforestation-free goods was 25% overall in 2019⁹.**

The "Round Table for Sustainable Palm Oil in Animal Feed" organized by DUH in November 2020 has brought about new movement: The German Animal Feed Association signaled that the animal feed industry was willing to exclusively source palm oil from safe, sustainable sources, as long as the rest of the supply chain clearly supported this and shared the additional effort. **Therefore, joint efforts are now required – through voluntary and ambitious commitments by the actors at all levels of processing and trade.**

⁹ IDH (2021) European Soy Monitor; Insights on the uptake of responsible and deforestation-free soy in 2019. June 2021. Prepared for IDH by Schuttelaar & Partners. IDH: Utrecht, the Netherlands.

4. Approach

DUH conducted the Feed Radar for the first time in 2021. The **positioning of the companies in this report** was surveyed on the **basis of general objectives and voluntary commitments to use only deforestation-free, sustainable feed**. For the verification of deforestation-free, sustainable goods, companies use mainly certifications that are accessible to all companies on the market. An evaluation of the company positioning based on the respective certification systems used and their specific differences did not yet take place in this first step. The DUH feed radar thus serves as an initial **stock-taking of the company positions on the sustainability of the feed produced and used in Germany** and at the same time is intended to provide the impetus for the fastest possible and complete switch to exclusively sustainable, deforestation-free palm oil and soy in the feed sector.

68 companies from six different sectors along the animal products supply chain were first contacted by Email at the end of March 2021 and asked to comment on the current and future use of only sustainably certified palm oil and soy feeds and on the increased use of domestic feeds. Companies were given the possibility to comment on the assessment beforehand publication.

The companies surveyed come from six economic sectors:

- **Feed industry:** importers, traders and producers of single and compound feed products
- **Meat industry:** manufacturers that distribute their own brands and produce private labels for e.g. retailers and wholesale (esp. broilers, pigs, cattle).
- **Dairy sector:** Cooperative dairies, dairy farming and brand manufacturers
- **Laying hen husbandry** and egg product manufacturers
- **Food retail and wholesale**
- **System gastronomy:** fast-food chains or quick-service restaurants

In May 2021, DUH sent reminders by Email to the companies and made queries until July in order to advance the submission of comments. In the course of an email notification, the companies were **informed of the assessment result before the report was published** and given the opportunity for final feedback. An assessment was adjusted if the additional information warranted it. The evaluation of company-related information took place in the period June and July 2021. Comments received or publicly available information up to 29 July were considered in the first edition of the Feed Radar. *In a second round of queries, the companies were contacted again by DUH in September 2021 and relevant information from October 2021 to January 2022 was included in the first updated edition of the report. Updates are marked in blue in this report in order to make changes in the assessment and text visible.*

Selection and evaluation of the companies

The companies surveyed were selected by DUH on the basis of **research on relevant market participants and information provided by participants in DUH's Round Table for Sustainable Palm Oil in Animal Feed¹⁰** in November 2020. The selection of companies in the Feed Radar does not claim to be exhaustive and will be supplemented by further companies in the future if required. For example, the company Heidemark as an important turkey producer in the EU may be included in the future.






The survey focused on animal products and products for human consumption. **Pet food** was not explicitly considered. According to information from a retailer, for the production of pet food industry mainly uses slaughter by-products that are not used for human consumption (mostly from the EU). The impact of the feed radar should therefore also have a positive effect on pet food.

For the assessment of the companies' positioning on the switch to sustainable, deforestation-free and domestic feeds, publicly available information from the companies' websites was evaluated in addition to the email responses or statements received. This includes website texts, various reports

¹⁰ See presentation on the project website at <https://www.duh.de/futtermittel-radar/>

and sustainability-related documents, such as purchasing guidelines or sustainability brochures, as well as (non-binding) ACOP reports on the RSPO website, if available. RSPO members are required to publish annual ACOP reports on the RSPO website, including timeframes for the full transition to sustainably certified palm oil.

Table 1: Legend for the evaluation of company information on existing provisions or intentions to use sustainably certified and deforestation-free as well as European feed in animal husbandry.

Colour code	Evaluation
	It is stated that a switch has already been made to 100% sustainably certified palm oil or soy feed or that ^a complete switch has been made to alternative European feed.
	A cut-off date is given for the use of only sustainably certified palm oil or soy feed or for the complete switch to alternative European feed. (Deadline for sustainable palm oil no later than 1.1.2022 and for sustainable soy no later than 1.1.2023).
	It is stated that sustainably certified palm oil or soy or European feed is advocated or partly used - without specifying a target date for the complete switch.
	It remains intransparent whether a switch to exclusively sustainably certified palm oil and soy feeds or the increased use of alternative European feeds is being strived for and implemented.
	The company responded to DUH's request and contributed information.

The companies were assessed on the basis of the available information using **evaluation criteria along a traffic light system** (see Table 1). The current share of sustainable, deforestation-free or domestic feed is almost never indicated by companies and was therefore not included in the assessment for the sake of simplicity.

For food retailers, the voluntary commitments on sustainable palm oil feed refer to their **own brands**.

Target dates partly with geographical restriction

The target dates given by the companies for the switch to exclusively sustainably and deforestation-free certified soy or palm oil are sometimes differentiated according to target markets. The given dates therefore refer to the feed or animal products sold on the German or European market and partly also to the products on the international market - i.e. a given date sometimes includes all worldwide locations of an internationally active company or group of companies. Some companies clearly indicate different reference years for the various markets (see IKEA). If the geographical reference was further specified by the company, this was marked in the report (see long version of the results table). **In order to effectively counter deforestation, it is necessary that companies exclude raw materials lacking procedures against deforestation from all their business activities – all products that are sold globally.** DUH therefore calls all companies that limit their target dates for deforestation-free animal feed to the German market to quickly expand these to the entire soy and palm oil supply chains - in Europe and worldwide.

What does "sustainable and deforestation-free" mean? – focus on the most common certifications

For palm oil, companies cited the Roundtable on Sustainable Palm Oil (RSPO) as sustainability certifications. For soy feed, companies often refer to the certification schemes listed in the industry's own FEFAC sourcing guidelines. Not all of these certification schemes are sufficient in terms of quality of standards and effectiveness. For example, they do not exclude all legal deforestation. Based on benchmark studies¹¹ on the scope and effectiveness of the systems, **DUH recognises the certification systems ISCC + / ISCC EU, Donau Soja / Europe Soya, ProTerra, BFA SS, CRS-CEFETRA and RTRS as sustainable.** In the report, we only took into account (for soy) the companies' statements and voluntary commitments on sustainable soy, without checking the quality of the standards.

¹¹ Kusumaningtyas, R. and Van Gelder, J.W. (March 2019), *Setting the Bar for Deforestation-Free Soy in Europe; A Benchmark to Assess the Suitability of Voluntary Standard Systems*, Amsterdam, The Netherlands: Profundo, p. 3.

As a substitute for overseas palm oil and soy (e.g. soybean meal, whole soybeans), the promotion of various European cultivated crops as well as a promotion of organic cultivation was accepted. In organic farming, only on-farm or regional feed is allowed – except for cattle and pigs (up to 5% conventional soy may be used). Organic palm oil is currently not fed, according to market studies by the Forum for Sustainable Palm Oil (FONAP). Instead of palm oil, rapeseed or sunflower oil can be used in animal feed, for example. Research is also being conducted into the usability of algae and insect oil. Overseas soy can be replaced by soy produced in Germany and Europe, rapeseed meal, field bean, lupine, pea and innovative raw materials such as insect protein. However, compliance with sustainability standards should also be required for European soy.

Self-commitments "oblige" – however compulsory reporting is required quickly

It should be noted that the **information provided by the companies is mainly voluntary** and it is not evident which information has been confirmed by independent third parties. The validity of the company information could therefore not be verified within the scope of the Feed Radar. Evidence¹² on the purchase of sustainable palm oil or soy (e.g. through delivery notes) does not have to be published by companies so far, nor does it have to be communicated to relevant authorities yet. There is no obligation in Germany, for instance, to report the quantities of sustainable palm oil or soy feed to the Federal Statistical Office or the Federal Office for Agriculture and Food (BLE). For reliable information, additional requirements are needed from the legislator and its authorities.

For the ongoing verification of the achievement of the target of 100% sustainable palm oil and soy feed, DUH has no choice but to continue to refer to voluntary company statements. The voluntary commitments or announcements can at least signal to consumers a quick "catching up" of the

missed engagement. However, this should not obscure the fact that the companies must first turn their announcements into reality and that voluntary commitments are nothing consumers or policymaker should ultimately rely on.

¹² Producers and retailers implement the requirement to switch to sustainably certified palm oil and soy feed by including it in their (public) purchasing guidelines and confidential purchasing contracts. Purchasing staff must be encouraged to consistently ask suppliers about sustainability aspects of palm oil and soy and to demand evidence of compliance.

5. Background

Price war on the backs of people, nature and climate

The system of intensive animal husbandry has prevailed in Germany in recent decades because it can compete with low world market prices. In order to be able to serve the aggressive market, production costs per animal had to be reduced, i.e. only those who keep many animals work economically. Since negative consequences for the environment are not priced in, animal products from industrial livestock farming are significantly cheaper than products that are produced in a nature-friendly and ecological way.

Meat in Germany is so cheap because others pay for it. Valuable habitats are destroyed by clearing forests, e.g. for the cultivation of palm oil and soy feed. The people living there lose their land and their livelihood. Climate gases are released, invaluable biodiversity is lost. However, the resulting costs for necessary protective measures are paid primarily by the people in areas particularly affected by the climate crisis, for example. This distribution is unfair and the costs must be redistributed so that the price of environmentally harmful products is also paid directly by the polluters and destructive businesses transformed ultimately. Subsidies should only go to socially desirable services such as animal welfare, nature conservation and regional development.

The entire supply chain, from the cultivation of animal feed to the finished animal product, must be subject to **strict, binding due diligence requirements that safely exclude environmental destruction and human rights violations.** Politicians are called upon to create a legal framework for this with the **EU Due Diligence Act**, but companies must already take action now in order not to shift the negative consequences and thus also the costs

of German meat consumption abroad. Pioneering companies show how this can be done.

Will certified palm oil feed make supermarket products much more expensive?

A representative survey from January 2021 shows that **consumers are willing to pay for ecologically motivated additional costs of animal products** if they benefit farmers, animals or the environment¹³.

In the case of sustainable palm oil, the additional costs of feeding certified palm oil according to the Roundtable on Sustainable Palm Oil (RSPO) certification system, which only sets minimum requirements, have so far been very low. **Thus, the additional costs for RSPO-certified palm oil in relation to the end product are far below one cent per litre of milk, ten-pack of eggs or broiler chicken, based on DUH estimates.** The exemplary calculation basis can be found in the document on the DUH Roundtable on Sustainable Palm Oil in Animal Feed and is available for download¹⁴.

Meat for export – impossible without massive feed imports

Germany is the world champion exporter of milk powder and pork. The degree of self-sufficiency is well over 100 percent. **Feedstuffs for animal husbandry are already grown on 60 percent of the agricultural land in Germany.** Nevertheless, this land is nowhere near enough to cover the feed requirements for domestic animal production. Intensive animal husbandry in Germany is only possible with feed imports, especially protein feed. However, large-scale soy cultivation in monocultures from growing countries such as South America is often done at the expense of species-rich forest ecosystems, such as the Cerrado dry forest, and is accompanied by the massive release of greenhouse gases and the loss of biodiversity.

¹³ <https://www.simon-kucher.com/zh-hans/node/6241>, 23.07.2021

¹⁴ <https://www.duh.de/futtermittel-radar/>

Palm oil and soy feed from unverified, unsafe sources with an increased risk of destruction of valuable ecosystems and human rights violations must be excluded from feed production and use in livestock farming. Certified sustainable goods must represent a minimum requirement for the sourcing of deforestation-critical raw materials such as soy or palm oil; in addition, further examinations in the sense of environmental and human rights due diligence are necessary to especially address weaknesses in current certification systems, for instance.

Which farm animals are fed palm oil and soy?

Palm oil is used in feed as a binding agent, among other things. According to information from companies, the proportion of palm oil in feed is often only a **few percent** (up to 2%), but the large amount of feed used means that quite a lot of palm oil is used in absolute numbers. It adds up to roughly 150.000 tonnes of palm oil per year according to a query among feed producers and traders (Meo Carbon Solutions, 2020). This amount of palm oil must be sourced from sustainable, deforestation-free cultivation beginning in 2022 in order to better exclude new rainforest clearances from animal farming in Germany and also from products exported in the whole world.

After all, German consumption of animal products at the feed level **still consumes around 113,000 tonnes of uncertified palm oil as a feed ingredient** (Meo Carbon Solutions, 2020). This means that the animal feed and candle sectors in Germany are responsible for the majority of the non-certified palm oil consumed in Germany.

Around 80 % of the palm oil in the feed sector ends up in poultry and laying hen farming according to a query in the feed sector (Meo Carbon Solutions, 2020). Artificial calf milk accounts for 10 %

and pig feed for 8 % of palm oil feed. 2% of palm oil is fed to other livestock (Meo Carbon Solutions, 2018). The sustainable share of palm oil feed in Germany is around 25 % (Meo Carbon Solutions, 2020). The animal feed industry has the third largest share of German palm oil consumption - after the energy and food sectors. Palm oil as an ingredient in food is already 90% sourced from sustainably certified cultivation.

The largest share of soy feed, 34 %, is used in poultry farming for fattening, followed by 27 % for pig farming and 23 % for dairy farming. 11 % of soy goes into laying hen farming (estimates based on Eurostat, 2020; FEFAC, 2019; Hoste, R., 2016). Thus, for 100 g of chicken breast, an average of 109 g of soy is fed¹⁵. Chicken are quite efficient fattening animals and high in consumer trend, thus the huge number of slaughtered chicken today is devastating and amounts to 1,7 Mio chicken per day slaughtered in Germany which adds up to about 653 Mio chicken in 2019.¹⁶

Farmed salmon imported from Norway or Chile is also often fed with soy. The feed of Norwegian farmed salmon popular in Germany, for example, consists of 25 per cent fish meal and oil, 71 per cent vegetable ingredients (e.g. soy and rapeseed) and 4 per cent other ingredients.¹⁷

Deforestation-free supply chains – first and foremost palm oil and soy

Soy and palm oil are the two commodities through which the EU contributes most to global deforestation¹⁸. It is therefore immensely important to reduce the consumption of these two commodities exclusively to sustainably grown goods that safely exclude deforestation.

The German Federal Government already decided on this in 2015 (Amsterdam Declaration) and wanted to have achieved the goal of 100% deforestation-free palm oil and soy by 2020. To date, however, it is still a long way off. It has become

¹⁵ https://www.duh.de/fileadmin/user_upload/download/Projektinformation/Naturschutz/Soja/Profundo_2020_Soja_Fleisch.pdf

¹⁶ <https://www.boell.de/de/2021/01/06/fleischatlas-2021>

¹⁷ <https://www.duh.de/futter-bei-die-fische/>

¹⁸ <https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/WWF-Report-Stepping-up-The-continuing-impact-of-EU-consumption-on-nature-worldwide-FullReport.pdf>, 23.07.2021

clear that voluntary targets are not sufficient for a complete switch to sustainable soy and palm oil. Therefore, policy-makers must introduce binding targets as soon as possible.

Moreover, in order to achieve comprehensive forest conservation further measures are clearly indispensable to fight and halt deforestation outside deforestation-free EU supply chains.¹⁹

Sustainability certifications – great potential, considerable weaknesses

Sustainability certifications for various raw materials have existed for many years. The approach is good: sustainable cultivation methods are recognizable for consumers on the product and thus they can consciously make sustainable purchasing decisions. For this system to work, however, the following criteria must apply:

- » The **sustainability requirements** must be comprehensive, as well as regularly adapted to new findings in order to effectively exclude, for example, deforestation and human rights violations.
- » **Compliance with the set standards** must be strictly and unannounced verified by independent control bodies. In addition, there must be effective incentive systems that enable the rules to be implemented and the additional costs incurred to be amortised.

On the second point in particular, there are still many weaknesses and need for improvement. In the past, there have been **repeated violations of the standards, so that the trust of many consumers in sustainability certifications has suffered**. The certification systems are responsible for restoring this trust through far-reaching improvements. However, companies are also called upon to do this, as they have created a large part of the standards or rely heavily on these systems for their sustainable procurement.

Nevertheless, sustainability certifications have many advantages. **The advantages must be expanded and the weaknesses eliminated**. In addition, legally binding **corporate due diligence obligations** must lead to companies monitoring certified producers and processing companies more closely themselves and taking responsibility for initiating improvement measures against environmental and human rights violations.

Further information on the strengths and weaknesses of certifications can be found in the *DUH Guide to Public Procurement of Sustainable Palm Oil* (cf. Chapter 2.4 from p. 13) and on the DUH website.

Alternative feeds from domestic raw materials

Instead of palm oil, **rapeseed or sunflower oil, for example, can be used in animal feed**. But **olive oil, soybean oil and animal fats** can also be used. However, the sustainable origin of soybean oil and animal fats must be ensured in the same way as for palm oil (e.g. waste material). In addition, companies are working on the extraction and feeding of **oil based on algae and insects**, which are cultivated by using waste, for instance.

Overseas soy can be replaced by **soy produced in Germany and Europe, rapeseed meal, field bean, lupin, pea** and possibly other pulses and innovative raw materials such as **insect protein**. Insect protein, according to studies, even has the potential to save a fifth of the UK's soy imports²⁰. Other different raw material alternatives are used by the feed industry, e.g. maize gluten and potato protein are used in organic farming.

In **fish feed**, palm oil and soy are used in addition to environmentally harmful **fish meal and oil** from wild catch. A number of useful vegetable substitutes can be obtained from potatoes, wheat, maize or rapeseed. Algae oil and insects are also being developed and increasingly used as promising,

¹⁹ See DUH candle check from 2020 and 2021 and DUH query on candles for further information on additional measures

²⁰ <https://www.feednavigator.com/Article/2021/07/02/WWF-and-Tesco-Insect-meal-could-reduce-the-UK-s-future-soy-imports-by-one-fifth-if-scaled-up>

more environmentally friendly feed alternatives²¹. Scientific studies suggest that by combining vegetable proteins in particular, a feed composition can be achieved that is comparable to fishmeal and fish oil-based feeds. It is important that any potential alternative begins with an assessment of its potential environmental impact (see DUH report²² "Futter bei die Fische" p. 23).

Sustainable consumption of animal products

Each person theoretically has 2000 square meter of arable land² available for their food consumption. In reality, however, Germans consume more than twice that amount for their diets. The indirect consumption of arable land through the cultivation of animal feed abroad for domestic meat consumption is particularly significant.

Since the 1960s, global meat production per capita has more than doubled. In Germany, the trend towards vegetarianism and even veganism continues, but Germans still consume on average twice as much meat as recommended by the German Nutrition Society (DGE) for health reasons and far too much to comply with the ecological impact limits of our planet.

A large part of agricultural land is needed today for the production of animal products - around 60% of Germany's arable land. The conversion of natural ecosystems for additional grazing land and fodder cultivation to satisfy Europe's hunger for meat is heating up the climate and accelerating the loss of species. According to the Intergovernmental Panel on Climate Change (IPCC), diet-related greenhouse gas emissions could be reduced by 80 per cent if we switched our diet mainly to cereals, vegetables and pulses.

²¹ <https://unternehmen.kaufland.de/presse/pressemitteilungen/pressemitteilungen-detail.y=2020.m=12.n=rangliste-nachhaltige-fuetterung.html>

²² https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewjt7fLDptz2AhWlxqQKHROAchQQFnoE-CAQQAQ&url=https%3A%2F%2Fwww.duh.de%2Ffileadmin%2Fuser_upload%2Fdownload%2FProjektinformation%2FMeeresschutz%2FBericht_Futter_bei_die_Fische.pdf&usq=AOvVaw3pO6FCOf1X0QuKnA69hLd_

6. Results and discussion

The information provided by the companies investigated and their classification are shown in Table 3 from page 27 onwards. Information from submitted statements and research results from publicly available information were summarized.

Company participation

- **Participation in the DUH Feed Radar was very high, with a response rate of 62% of email enquiries.** 42 out of 68 companies contributed information on their positioning (as of July 2021), some of which was not publicly available. Some companies updated their publicly available purchasing guidelines or position papers. **Especially the feed industry, the food trade and the system gastronomy actively contributed information.**
- This suggests that more sustainable, deforestation-free feeding is not only already an issue for many companies, but that the importance of the sustainable orientation of livestock farming has greatly increased and represents a competitive factor already. GMO-free feeding and animal welfare-friendly husbandry could also already be observed in many companies as a central topic of corporate communication. In addition, vegetarian or vegan substitute products are increasingly being offered – with equal attention being paid to European or deforestation-free, sustainable soy.
- 26 companies did not actively participate in the feed radar (as of July 2021), but like all companies, they have the chance to submit information later or to participate in a repeat of the enquiry. **In the updated version, 25 companies haven't replied to the enquiry (as of January 2022).** DUH updates the corresponding information afterwards. **Especially from large fast food chains and the meat and dairy industry, DUH hopes for new information and targets in the next round.**

The feed industry

- **The animal feed industry is already partly on the right track.** **Deutsche Tiernahrung Cremer**, which claims to be Germany's leading animal feed company (produced a total of 2.6 million tonnes of feed in 2020), states that it has been sourcing **100% of its palm oil from sustainably certified, deforestation-free cultivation since 2020.** The Roundtable on Sustainable Palm Oil (RSPO) is cited for the sourcing of deforestation-free palm oil.
- For soy feed, some feed companies claim that they already **partly use sustainable and deforestation-free certified overseas soy and European soy.** Generally recognised certification systems for deforestation-free cultivation, such as ProTerra, Round Table for Responsible Soy (RTRS), Donau Soja, Europe Soya and ISCC+ are used, but also certifications that are listed in the industry-appropriate FEFAC purchasing guidelines. Not all of these certification schemes are sufficient in terms of quality of standards and effectiveness. For example, they do not exclude all legal deforestation (this includes the clearing of forests that the target countries do not legally sanction or allow, but which should definitely be preserved from a climate and nature conservation perspective).
- For example, **BEWITAL agri** states that it uses 65% certified soy (various certification systems, not further specified). The company stated the goal of using **exclusively non-GMO soy from sustainable cultivation**, preferably Donau Soja, which is welcomed. Other companies have so far mostly not made the share of certified soy transparent. **GS agri** says that it uses a wide range of soy certifications in its soy procurement, including the RTRS, ProTerra and ISCC+ systems, which are recognised with regard to legal and illegal deforestation.
- In addition, **three new measures on sustainable palm oil feed** were announced from the feed industry:
 - **BEWITAL agri** and **AGRAVIS Raiffeisen** want to use **only sustainable palm oil from 1.1.2022** – on the German market (BEWITAL agri) and at German locations

and beyond (AGRAVIS Raiffeisen). The changeover is welcomed by DUH and other companies should join in by the end of 2021.

- **Heinrich Nagel** states that it is aiming for 100% sustainably certified palm oil only by 2025 – and only in products sold in the DACH region. In Switzerland and Austria, however, the use of palm oil in animal feed is already largely excluded by associations.²³
- » A voluntary commitment to switch procurement to deforestation-free raw materials should be extended **as quickly** as possible to **all exported products, foreign production sites or international subsidiaries**, even if this presents companies with new challenges in terms of competitiveness. The destruction of ecosystems relevant to climate protection and biodiversity must not be tolerated or exploited in the own supply chains and by subsidiaries. Companies from the system catering or food wholesale sectors show that **international engagement must not be ruled out per se**. **IKEA and MERTO**, for example, have set procurement targets for non-European markets, too, including China.

The meat industry

- Danish meat producer **Danish Crown** will **stop using palm oil** in animal feed from **2023** and support sustainably certified palm oil²⁴ until then. In 2022, the amount of palm oil purchased for animal feed will be halved and sourced sustainably. **By 2025**, according to Danish Crown, soy feed is also to be fully sustainably certified and at least one third of all protein feed used in fattening shall come from **domestic sources by 2023-25**. In addition, Danish Crown writes that it will work to ensure

that **all FEFAC-listed certifications and company programmes are improved in the future** and can be used as proof of deforestation-free cultivation.²⁵

- The German meat industry, on the other hand, has not yet responded to the DUH enquiry - except for **Westfleisch** and the **PHW Group** with its **Wiesenhof brand**. Unfortunately, the two companies have not yet made any new commitments or targets on sustainably certified palm oil in animal feed. **Since the second round of enquiries at the end of 2021, however, Westfleisch has now taken new steps and, according to its own information, from 1.1.2023 it wants to set a requirement for suppliers to use only sustainable and deforestation-free certified soy feed.** In the course of this, Westfleisch should also set corresponding requirements for the use of palm oil to be free of deforestation – despite small amounts of palm oil in the feed of pigs and large livestock, this is a necessary minimum measure for forest and climate protection (as of January 2022). Based on publicly available information, the **PHW Group** continues to rely exclusively on **sustainably certified soy feed according to RTRS or ProTerra only for the Wiesenhof brand** (as of August 2021). DUH has not yet been informed whether similar objectives are already being pursued or implemented throughout the Group. The target for sustainable, deforestation-free soy must now be quickly transferred to the entire group and/or the public must be informed in more detail. **In the second round of enquiries, there was no response with new targets or measures.**
- **The Rothkötter Group**, which also operates its own compound feed plants, did not respond to the DUH enquiry and publicly states only that soy meal is sourced exclusively from non-amazon areas. Thus, the risk of defor-

²³ <https://www.schweizerbauer.ch/politik-wirtschaft/agrar-wirtschaft/fertig-mit-palmoel-im-futter/>

²⁴ <https://www.danishcrown.com/news/danish-crown-steigt-bis-2023-aus-palmoel-aus/>

²⁵ <https://www.danishcrown.com/en-gb/sustainability/responsible-soy/>

estation in the threatened, carbon and species-rich savannah areas of the Cerrado of South America is not addressed, so that according to current knowledge, deforestation-free soy procurement cannot be assumed.

In the second round of queries, again there was no response with new targets or measures, although **Rothkötter is a specialist in poultry** and is one of the largest German meat processors - around 80% of the palm oil fed in Germany is used for fattening and laying hens according to surveys²⁶.

- According to its own website, **Tönnies** is already pursuing the goal of banning palm oil²⁷ and South American soy from its stables by 2030. Whether Tönnies has already set internal targets for the sustainability of the palm oil and soy feedstuffs used until then remains opaque. In the second round of questions, there was again no reaction concerning new targets or measures.
- **Sprehe Feinkost** also represents one of the largest meat processing companies in Germany and has not yet commented to DUH at all.
- Due to the partial specifications of companies from food retail and gastronomy, it can be assumed that some of the meat suppliers are already working on the conversion to more sustainable, deforestation-free feed. **Since around 80% of palm oil is fed to fattening poultry and laying hens, DUH expects immediate commitment from the major meat suppliers - with the support of the food retail sector.** It remains to be seen which companies in the meat industry and from trade and gastronomy will act responsibly and provide further information.

Dairy and egg producers

Unfortunately, dairies and egg suppliers gave only sporadic feedback, but some good examples can be noted:

- **Hochland Deutschland** has already signed a contract with German milk suppliers on 1 July 2020 stating that palm oil and overseas soy may no longer be used in animal feed.²⁸ A surcharge of 1.0 ct/kg is paid to the producers in addition to the milk price.
- **Friesland Campina Germany** also refrains from using palm oil and overseas soy from German suppliers. The soy contained in the feed either comes from Germany or is certified according to Donau Soja. The company stated that only feed from countries that are geographically entirely in Europe is used. These **specifications are contractually fixed** between the feed manufacturer, the farmer and the dairy. According to the company, internal and external monitoring and auditing is carried out.
- The milk product manufacturer **Zott** stated that it had switched to domestic feeds to a large extent, but the possible residual quantities of non-certified palm oil and soy feeds have not yet been fully clarified. According to Zott, 98% of the individual and compound feeds of the German milk producers who supply Zott are sourced from geographical Europe, and 90% from Polish producers. A target of 100% European feed is being striven for - but it remains unclear until when.
- **ARLA Foods** is ahead in **the use of only sustainable, deforestation-free soy**, even though palm oil feeds have not yet been considered. According to the company, it has been using only sustainable, deforestation-free soy feed

²⁶ Around 80% of palm oil in feed is used in broiler and layer farming. 10% of palm oil is used in artificial milk replacers in calf rearing and 8% in pig farming. 2% is fed to other farm animals. Alternatives to palm oil are already being used in some cases. (Meo Carbon Solutions, 2018)

²⁷ Note: Lately positioning on sustainable palm oil or its ban was removed from the website (as of march 2022).

²⁸ Press release "No more feed from overseas" <https://www.hochland-group.com/de/news/pm-kein-futtermittel-mehr-aus-ub-ersee.htm>

from its European producers **since 2014**. In accordance with the purchasing guidelines for sustainable soy, only organic standards, Pro-Terra or the Round Table for Responsible Soy (RTRS) are accepted - physically certified or as RTRS certificates. However, as with palm oil or other imported goods, a **rapid switch to physically certified goods** should be implemented as soon as possible, as this facilitates traceability back to the plantation of origin, which involves all processing stages, and a clean separation is made between non-certified and sustainably certified material. An exception are certificates from small palm oil farmers - here the advantage of direct support for sustainable small producers outweighs the disadvantages, as some of them do not yet have access to traceable, certified supply chains.

- The **laying hen farmers**, **Vrieshof** and **Gutshof**, as well as the organic pioneer **Biovum with Eggerhof** score well on palm oil: they stated that palm oil is already dispensed with in their feed. The **organic farm Eggerhof** also does without overseas soy: **100% European organic soy** from Germany, Italy, Austria or Romania is used (feeding according to Bioland certification with 100% organic fodder and at least 50% of the fodder from their own farm or from regional cooperation).
- Unfortunately, there were no responses from the dairy industry with more detailed information from the companies **Deutsches Milch Kontor**, **Hochwald** (Bärenmarke), **MEGGLE**, **Bayernland**, **Fude** and **Serrahn Milchprodukte** (e.g. Ayrar drink) and **Unternehmensgruppe Theo Müller** (e.g. Müllermilch drink). Two manufacturers of egg products - **OVOBEST Eiprodukte** and **Eifrisch Vertriebsgesellschaft** - and some other laying hen farmers and unfortunately also did not submit any more detailed information on feed. However, information can be continuously submitted, so that nothing stands in the way of a future exchange.

GMO-free is not enough

As the main distribution channel, **food traders** have a special responsibility and in many cases already stipulate that laying hens and dairy cattle are fed GMO-free feed. The **requirements should now be extended to deforestation-free palm oil and soy components** as soon as possible. Sufficient surcharges for producers for more sustainability should be taken into account in the face of possibly rising feed costs - even if these are very low, at least in the case of palm oil (see chapter 5).

The food trade

- **Lidl is leading** the way in the German market **with new targets** on deforestation-free palm oil and soy feed. The supermarket is the only food retailer to state that it will **allow certified palm oil feed** referring to its own brands on the German market as early as **1st January 2022** and only **certified soy in all livestock farming** for all product groups with animal products as of **31st December 2022**. For this purpose, compensation with RSPO cultivation certificates (so-called RSPO credits) will initially be used until the palm oil feed is also physically sourced from certified sustainable plantations in the near future (so-called "segregated" commodity flows). The RSPO credits are offered by sustainable plantations or smallholders whose sustainably produced palm oil is not yet absorbed and purchased by palm oil mills as such and makes it possible to support deforestation-free cultivation in a targeted manner - until upstream suppliers, e.g. feed producers, have changed their raw material procurement. According to its own information, Lidl Germany has already achieved a certification share of **73% for soy** (via RTRS-certified soy including RTRS credits).

"All of Lidl Germany's palm (kernel) oil has been 100 per cent certified by the Roundtable on Sustainable Palm Oil (RSPO) since 2018. Palm (kernel) oil in food products is 100 per cent segregated. Derivatives and fractions contained in food and near-food products are certified at least according to the mass balance principle. Lidl Germany will have all palm oil used as feed for animal products certified at least as mass equivalent²⁹ from 1.1.2022. In the future, we will strive for segregated commodity flows." - Lidl Purchasing Policy for Deforestation- and Conversion-Free Supply Chains (translated from original German version from July 2021)

- In addition, the supermarket chain **Lidl** is the only retailer to state that it will also check **third-party brands** and reserve the right to impose sanctions. DUH had suggested this to the food trade in its call for participation in the feed radar. A **delisting of repeatedly non-compliant brands** would not be an excessive step in view of shrinking tropical forests, climate crisis and species extinction and could shake up some product suppliers who still process non-certified palm oil even in the end products.

"(...) Instead, the use of domestic protein feeds - such as rapeseed meal should be increased. As an alternative, we prefer soy from the European Union. As long as there is a need to import soy, our goal is to switch exclusively to certified GMO-free and sustainable soy. We rely on recognised certification systems such as ProTerra, the Roundtable on Responsible Soy (RTRS) and Donau Soja or Europe Soya. However, as the majority of soy fed in Europe still comes from genetically modified cultivation in South America, Lidl launched the transnational Lidl Soy Initiative in January 2018 to promote certified sustainable, GMO-free soy cultivation. The farmers receive a premium for this. The

soy is sourced exclusively from land in Brazil categorized as safe to avoid further deforestation of land worth protecting." - Lidl position paper for more sustainable purchasing of animal products (translated from original German version from 09/2020)

- Other supermarkets, such as **ALDI**³⁰ and **REWE Group**, actively provided feedback on their partial targets and upcoming actions on deforestation-free and local feed, but are **mostly still hesitant to set clear comprehensive targets** on 100% deforestation-free feed across all commodity groups with animal products.
- **REWE** does not give a deadline for the complete conversion - but states that it will already ensure **100% sustainable soy feed for fresh meat, eggs and milk by 1.1.2021**.³¹
- The **ALDI SÜD Group** and **ALDI NORD Group** state for the German market to achieve **60% of soy sustainably certified in the areas of poultry, beef, pork and shell eggs from 1.1.2022**. According to ALDI, by 2025 all relevant product groups, including aquaculture products, should no longer be associated with unverified soy feed. No target has yet been announced for palm oil. There is hesitation, but a new international position paper is in prospect for the beginning of 2022.
- **EDEKA** and **Netto** are also not meeting their own targets for a gradual switch to more sustainable feed for various animal products on time (see EDEKA Progress Report 2019). Rather, it has so far been working towards the increased use of domestic and certified sustainable overseas feed "in the long term" and the absolute figures or current certification percentage are not disclosed. However, the supermarket chain is letting the WWF keep a close eye on its actions, which is to be welcomed.

²⁹ "Mengenäquivalent" in German refers to RSPO book and claim certificates also known as RSPO credits

³⁰ ALDI" refers to the ALDI SÜD Group and the ALDI Nord Group.

³¹ A changeover in the product groups non-fresh meat products (frozen, etc.), dairy products, butter and aquaculture products would therefore still be pending. A target date for the changeover has not yet been announced.

- **Kaufland**, as part of the **Schwarz Group**, which also includes Lidl, initially kept a low profile on deforestation-free feed supply chains and on deforestation-free palm oil and soy feed (as of August 2021). It remained open whether Kaufland will join the commitment of its "sister" Lidl in the course of 2021. ALDI Süd and ALDI Nord are taking a much more united stance towards consumers and are creating more clarity regarding ALDI's position as a brand. [Recent developments at Kaufland show that the company now wants to catch up and fulfil its responsibility in accordance with the new position paper on sustainable soy feed. Accordingly, specifications for sustainable, deforestation-free soy feeds are to be gradually introduced on a binding basis for suppliers from 2022. The ProTerra and RTRS certifications for non-European soy will be required \(January 2022\).](#)

Palm oil contained in fodder - altogether not little!

Many companies argue that palm oil accounts for less than 2% of feed - much more palm oil is sometimes used in some food products like margarine. But in absolute terms, most of the non-sustainably certified palm oil is found in animal feed. Around 113,000 of 150,000 tonnes of German palm oil feed come from uncertain, risky sources that may be linked to new deforestation (Meo Carbon Solutions, 2020).

- **Wholesaler METRO** still lacks targets on palm oil, but sustainable soy feed is to be achieved at **all international locations by the end of 2025**. Wholesaler **Transgourmet** announces that it will position itself at the end of 2021 with new multi-year targets and new key dates to switch to 100 % sustainable raw materials. **Full traceability of palm oil** and animal products will be pursued, says Transgourmet. From DUH's point of view, full traceability should mean the identification of the plantations of origin – the indication of oil mills of origin is not sufficient, because due diligence obligations for forest protection and human rights must include plantations in the future.
- The **Bartels-Langness Group, including familia, MARKANT and Citti**, on the other hand, did not comment as a wholesaler and retailer and still has a red rating in all questions - whether consumers indirectly encourage rainforest clearing in the future by consuming animal products remains uncertain.

The "small" retailers and drugstores

- While the **large supermarket chains cover about 85% of the food market and largely determine the production conditions**, many smaller food retailers with small market shares of 1-2% feel overwhelmed by the requirements for sustainable palm oil and soy feeds or state that the requirements of the large supermarket chains would induce the upstream suppliers in the meat, dairy and feed industries to switch to deforestation-free sources anyway. However, the **intensive commitment on the part of some small retailers**, such as **tegut...** or **dm**, shows how even comparatively small food retailers are already **contributing as organic pioneers to the expansion of domestic and regional feed capacities within the framework of organic agriculture**. Their own organic brands use animal products from organic farms (from EU organic to organic association's own schemes), such as Bioland, demeter, etc.), which prescribe high shares of local feed from the farm or region. For pigs and poultry, up to 5% conventional protein feed (e.g. overseas soy) is still allowed, but a gradual exclusion is foreseen. However, some of the organic farmers and food traders already refrain from using overseas soy and source European protein crops or, like tegut., expand pasture farming and suckler cow husbandry (e.g. refrain from artificial calf milk with palm oil and switch back to natural milk feeding).
- Other retailers, such as **Globus**, state that they support the change of feed sources and are in close contact with Donau-Soja. The difficult availability of European soy, however, is currently preventing the company from introducing mandatory requirements for suppliers. This shows that promoting the cultivation of domestic protein plants, in addition to reducing the number of animals, plays an important

role in getting away from the large quantities of imported soy which still comes from rainforest areas.

Often sitting at the longer lever...

The four big food retailers, with their market coverage of the food sector of around 85%, very often hold the reins on many sustainability issues - apart from policy makers and sometimes customers. They can influence companies like Rothkötter, PHW Group, Tönnies, Westfleisch and Deutsche Milch Kontor to quickly introduce more sustainable procurement practices.

Own brands vs. external brands

- » For food retailers, the voluntary commitments on sustainable palm oil feed always refer to their **own brands**. In addition, retailers should communicate the target to key third-party brand manufacturers and communicate an implementation deadline for the exclusive use of sustainable palm oil in both animal husbandry and food products. **In the absence of legislation**, publishing and implementing a **third-party brand policy** with the option of delisting non-compliant suppliers can be an important step towards achieving the 100% target on sustainable, deforestation-free palm oil in the food sector. Around 10% of palm oil in final products is still of non-certified origin and associated with risks of human rights abuses and deforestation.

The system gastronomy

- **Many popular fast food chains** have so far **not provided information on deforestation-free feed** along their food offerings with animal products and have received predominantly **red ratings**: **Burger King, Vapiano, FR L'Os-teria, Valora Foodservice Germany** (e.g. Backwerk, Ditsch), **Domino's Pizza and Deutschland Lufthansa Service Gesellschaft**. Without requirements for deforestation-free supply chains, the consumption of products here may be fraught with various risks of environmental

destruction, the displacement of people or human rights violations for consumers. DUH hopes to receive more detailed information or steps for improvement from these companies soon and to be able to include them in an update of the feed radar. Minimum measures to exclude potential environmental and human rights problems caused by the unverified cultivation of oil palms or soybeans should be taken as soon as possible.

- **Three restaurant chains have now signalled their willingness to act:** **Nordsee** says it is now approaching its suppliers. Currently, feed is not listed in the product specifications of aquaculture products. However, the issue is now to be taken up in dialogue with suppliers. **Autobahn Tank&Rast** reports that it wants to work more on including organic products in the product assortment in the future. **Subway** stated in summer 2021 that it would start a complete survey of all suppliers' data and then make this data available. **In November 2021, Subway added that it was working to move to 100% sustainable feed - this was the stated goal for both palm oil and soy (status January 2022).** However, due to the large number of suppliers for the German market, it was not possible to make a binding commitment for palm oil in the feed as early as January 2022. However, many people are unaware that Subway is one of the **largest fast food chains in the world**. Subway should now strengthen its commitment as the most powerful fast food company and lead the way with clear binding targets: **By 1.1.2023 at the latest, the requirement of 100% sustainable, deforestation-free palm oil and soy feed should be adhered to and contracted accordingly by Subway with suppliers in Europe and beyond.**
- **Only one fast-food chain or restaurant chain is working on concrete deadlines** from which only sustainable palm oil and soy feeds should be allowed: the furniture shop **IKEA with its restaurants**. According to IKEA's own statements, the goal of **100% sustainable, deforestation-free soy feed for products with pork, beef, poultry, eggs, salmon and dairy products**

is to be ensured **at all international locations by 2025** (RTRS credits or traceable and physically RTRS certified). According to IKEA, this will be **achieved in Europe, Canada and Australia for poultry by the end of 2021**. The soy feed for salmon, meatballs and sausages already comes 100% from certified cultivation - it is still unclear for which markets this applies to the latter two products (RTRS credits from soy producers in the Brazilian regions of Maranhão and Piauí). For **palm oil**, too, **sustainable, deforestation-free palm oil feed is to be ensured** for pork, beef, poultry, eggs, dairy products and salmon in **all international markets by 2025** (RSPO credits or physically RSPO certified). **However, a complete switch of palm oil and soy feed in all IKEA product groups on the German market as of 1.1.2023 is necessary now**, in order not to let time pass idly by while forests can continue to be cleared for feed cultivation. IKEA could use the opportunity to become the **global pioneer in the system gastronomy** for sustainable, deforestation-free feed (updates from January 2022).

- Unfortunately, **McDonald's Germany** continues to ask suppliers to use deforestation-free soy feed **only in some areas**. According to its own information, the mega-corporation has not yet committed itself to palm oil feed. **Even after repeated enquiries, the fast food chain has not taken a position on whether only sustainable, deforestation-free palm oil feedstuffs will be allowed in reference to products for the German market in the future and from which target date**. However, partial regulations already apply to soy feed: For broiler feed for the German market, 100% soy from sustainable cultivation is used (RTRS or ProTerra). The soy in the feed of laying hens, whose products are used on the German market, already comes from European cultivation, according to McDonald's. **What is missing are requirements for deforestation-free soy feed for beef and pork as well as for dairy products**. However, McDonald's is not yet taking

full responsibility and still passes it over to others - for example to the meat processing companies. **Even after the second round of enquiries, Mc Donald's Germany has still not announced any new binding targets and measures on sustainable, deforestation-free palm oil and soy feed (as of January 2022)**. This is surprising in view of a market giant with restaurant branches worldwide. In the past, the company had increasingly focused on making its food offerings more sustainable and healthier. The increasing demand for vegetarian or vegan burgers in particular is not unseen by neither McDonald's nor Burger King. It remains to be seen which of the two well-known burger companies will position itself more positively in the future when it comes to responsible animal products and vegetarian and vegan product alternatives. **What is needed now is concrete action to completely eliminate forest clearings and other destruction of valuable ecosystems from animal product supply chains**. After all, the goal of many European companies and governments was to establish 100% deforestation-free, sustainable palm oil and soy supply chains as early as 2020.³²

80% palm oil ends up in poultry stables, around 20% goes to pigs and calves

The sustainable share of palm oil feed in Germany is only at shocking 25 per cent, although an immediate switch would be possible. In our view, this is an untenable situation and is unfortunately tolerated by far too many companies along the supply chain of animal products. This behavior risks further clearing of forests that are home to the orangutan among other threatened species. Provisions for deforestation-free animal feed has to cover all animal products: Around 20% of palm oil in the German or European feed sector does not end up in fattening poultry and laying hens (80% of palm oil is fed here) - but is also used in artificial calf milk (10%), pig feed (8%) and other livestock.

³² Amsterdam Declaration (2015): <https://ad-partnership.org/about/>

- **Yum! Brands Restaurants Int**, the company behind KFC and Pizza Hut, publicly states that while it does not use sustainability certification for soy feed, 100% of Brazilian feed mills in its supply chains have been compliant with the Amazon Soy Moratorium since 2019. However, this measure on deforestation-free soy is not sufficient. Furthermore, **Kentucky Fried Chicken** communicated to DUH in the second round of enquiries that it is working closely with its suppliers to **implement the obligation of RSPO-certified palm oil in feed** – at least some action with regard to palm oil. KFC says it is a global foodservice brand with over 23,000 restaurants in more than 140 countries and territories. According to KFC, this requires sufficient lead time to introduce changes in the supply chain across markets and in a way that is feasible for all parties involved. As soon as KFC can confirm the complete switch to 100% sustainable palm oil in feed, this will be announced (as of November 2021). However, KFC has not set a clear target date of 1.1.2023 and **Pizza Hut** has still not made any statement on the issue, which is why Yum! Brands Restaurants still does far too little for forest and climate protection. People need to be aware though that Pizza Hut is one of the **world's fifth largest restaurant chains**³³ on a par with Burger King – and it is **pursuing immense growth on the German market** (over 200 new locations throughout Germany, especially home delivery service and express concept)³⁴.
- However, to **advance sustainable soy cultivation and rainforest protection**, a commitment to sustainable cultivation practices and to the protection of remaining rainforests is needed. Especially since the current cultivation areas were once rainforest and are not expected to be reforested by producers in the near future. **As long as the global demand for palm oil or soy grows and deforestation in**

the tropics is part of everyday life, companies that "occupy" tropical agricultural land have a **responsibility to support the protection of remaining tropical forests where possible**. Therefore, even the **purchase of sustainably certified goods from areas that have already been cleared for a long time cannot mean a free pass – it is only a first minimum measure or "first aid" to exclude new clearings from the trade** and to pay surcharges for deforestation-free, more responsible cultivation. For more information on the issue of rainforest protection beyond certified deforestation-free supply chains, please visit the DUH website and DUH candle check on palm oil from 2020 and 2021.

- According to its own information, the **Block Group** **already** achieves **100% sustainable palm oil feed for poultry in Europe, Canada and Australia by the end of 2021**. Sustainable soy feed is also used (no information on certification). Information on the feeding of dairy products, eggs and farmed fish is still missing (insofar as fish dishes are offered). According to Block Group, the cattle farming, which accounts for 80% of the dishes, takes place in large parts in Argentina and Uruguay. According to the information, the animals eat pasture grass after weaning, which means that they are not fed palm oil or soy. It has to be noted and stressed at this point that deforestation-free pasture farming in South America was not yet subject of this survey. **However, since grazing is highly responsible for a large part of the destruction of valuable ecosystems in South America, evidence of deforestation-free farming should also be presented and submitted by companies dealing with beef.** Along with palm oil and soy, the import of meat is one of the biggest drivers of deforestation worldwide.

³³ <https://www.gevestor.de/finanzwissen/oekonomie/rankings/die-5-groessten-restaurantketten-mcdonalds-verliert-spitzenposition-739272.html>

³⁴ <https://pizzahut.de/en/franchise.html>

7. Conclusions and demands

To date, voluntary measures by the private sector to curb imported deforestation have not been sufficient. A broad mix of instruments is needed, which must involve not only the private and financial sectors, but also the public sector. The first imperative is to use raw materials sparingly and efficiently and, where appropriate, to replace them with less critical ones. Products that are linked to deforestation and human rights violations must not cross European borders. Certifications can give indications of sustainable production, but they must be constantly improved. The purchase of certified goods is therefore only seen as a minimum measure. Further verification in the sense of environmental and human rights due diligence are necessary to systematically address and remedy weaknesses in certification systems and reach zero destruction of forests and other carbon-rich and species-rich ecosystems. Hence, palm oil and soy feed must no longer come from unsafe growing regions and countries where the destruction of ecosystems relevant to climate and species protection continues.

Our climate and the habitat of endangered species such as the orangutan must no longer be put at risk for the sake of big profits in meat and dairy business. Therefore, our demands are for politicians to introduce legal requirements as soon as possible and for company managers to take over responsibility and immediately commit their companies to concrete zero destruction measures and present implementation in a publicly comprehensible way.

The following measures must be pursued and implemented by policy makers and companies:

- » **As soon as possible, only sustainable, conversion/deforestation-free³⁵ palm oil in animal feed - from 1.1.2022 at the latest - and, where possible, preference for domestic or European vegetable oils.**
- » **As soon as possible, exclusively sustainable, conversion/deforestation-free³⁶ soy feed and a gradual increase in the share of European protein crops**
- » **For the retail sector in particular: change own brands and **discontinue third-party brands** that do not meet the requirements for sustainable, deforestation-free palm oil and soy supply chains, so that the product range as a whole is deforestation-free.**
- » **Binding requirements for credible certification systems** that safely exclude any destruction of carbon- or species-rich ecosystems in the tropics and beyond
- » **Import requirements** that stop the import of unsustainable palm oil and soy products, including animal feed - as quickly as possible under **an EU legislative framework³⁷** or at national level if an ambitious agreement at EU level is not possible, i.e. effectively excluding conversion and destruction of carbon-rich and species-rich ecosystems
- » **Animal welfare** in combination with a **reduction of the number of livestock** to an environmentally sound level³⁸: Support German farmers - especially small and medium-sized farms - with **higher purchase prices** or financial aid to make the switch to more sustainable feed and more environmentally sound, animal welfare-friendly livestock farming.

³⁵ e.g. certified according to RSPO or an equivalent certification system; credits (book & claim goods) only as a transitional solution to physically certified goods (esp. SG).

³⁶ e.g. certified according to one of the following or equivalent certification systems: ISCC + / ISCC EU, Donau Soja / Europe Soya, Pro-Terra, BFA SS, CRS-CEFETRA and RTRS; Credits (Book&Claim-Ware) only as a transitional solution to physically certified goods (esp. SG).

³⁷ EU supply chain law and EU requirements against imported deforestation

³⁸ Gradual development towards land-based animal husbandry with fewer animals, reduced need for (imported) feed and the mitigation of the nitrogen problem by reducing the use of liquid manure in the fields and the associated nitrate input into groundwater and surface water.

- » **Turning away from the excessive export orientation** of German animal husbandry, especially in the meat and dairy industries, and instead **promoting plant-based milk and meat substitutes** at home and abroad
- » **Increased transparency** – companies must publicly state exactly where the feed components come from, under what conditions they were produced and which sustainability certifications are adhered to. To this end, existing **reporting obligations** on the processing of raw materials should also be adapted.
- » **Exert trade policy pressure:** Governments of producing regions or countries that repeatedly reject offers of cooperation or compensation for rainforest protection, that do not present alternative options or even actively promote forest destruction³⁹, should ultimately be punished with temporary trade boycotts.
- » **Do not limit voluntary commitments to local products:** DUH calls on companies to expand their targets for switching to deforestation-free animal feed, which are partly limited to Germany or the DACH region, as quickly as possible to **international target markets**. Products that are produced or distributed abroad – whether through export or through production sites located there – must meet the same requirements for zero deforestation, zero conversion of other valuable ecosystems and sustainability as in Germany or within the EU.
- » Those who pay attention to **organic animal products** or **specially promoted sustainable product lines** can support the switch to European and more sustainable feed. However, it has to be noted that deforestation by conventional overseas soy is not yet completely ruled out in organic farming.
- » **A reduction in the consumption of animal products** represents an even greater gain for climate protection and species conservation since the cultivation of plant-based substitute products for human nutrition uses less land. Moreover, grazing of dairy cattle sometimes uses land that is unsuitable for arable farming and thus there is potential for support of sustainable pastureland.

Outlook

The DUH Feed Radar shows that the majority of companies along the feed supply chain are still too little committed to sustainable, deforestation-free feeding that also excludes destruction of other carbon-rich ecosystems like savannahs. **More companies must now join the pioneering companies highlighted in the Feed Radar so far.** All companies that profit from animal products have a responsibility to implement and invest in concrete measures for more sustainable feeding and animal husbandry. **Deutsche Umwelthilfe will continue to engage in dialogue with companies and demand new voluntary commitments to switch to deforestation-free palm oil and soy and to push for higher credibility of certifications.**

What consumers can do

- » For the time being, most supermarkets and fast-food restaurants, with few exceptions, continue to run the **risk of encouraging new rainforest clearances** through the consumption of conventional animal products due to lacking regulation of soy and palm oil feed components.

³⁹ For example, through legal or illegal activities of the forestry or agricultural industry, through urbanisation or other sectors.

8. Long version of the results table for the 68 companies

Table 2: Legend for the evaluation of company information on existing regulations or intentions to use sustainably certified and deforestation-free as well as European feed in livestock farming.








Colour code	Evaluation
	It is stated that there has already been a switch to 100% sustainably certified palm oil or soy feed or alternatively completely to European feeds.
	A cut-off date is given for the use of only sustainably certified palm oil or soy feeds or for the complete switch to alternative European animal feeds. (Deadline for sustainable palm oil no later than 1.1.2022 and for sustainable soy no later than 1.1.2023).
	It is stated that sustainably certified palm oil or soy or European animal feeds are endorsed or partly used – without specifying a cut-off date for the switch to 100%.
	It remains intransparent whether a switch to exclusively sustainably certified palm oil and soy feed or the increased use of alternative European animal feeds is being pursued and implemented.
	The company responded to DUH's request and contributed information.


Table 3: Evaluation of the existing provisions or intentions of 68 companies along the animal products supply chain to switch to palm oil and soy feeds from sustainable, deforestation-free cultivation and to use alternative European feeds. The data in the table are summaries and are based on the following sources of information: Company email statements, company websites, publicly reports such as company RPSO ACOP reports. The sources used are voluntary company disclosures and should be independently verified in the future. [Note: Comments and relevant information from the second enquiry are noted in blue below.](#) Please note that the German report contains the wording that was officially checked by the companies.

Company	Positioning on the use of 100% sustainable palm oil and soy feed:		Positioning on the use of alternative, European feeds:	
	On sustainable palm oil	On sustainable overseas soy	Replacing palm oil with e.g. rapeseed or sunflower oil	Replacement of overseas soy by e.g. European soy, field bean, lupine
Feed producers, *partly only processing and trading companies (12 companies)				
Deutsche Tiernahrung Cremer		100% sustainable palm oil has been used at all production sites since 2020.	Target to use 100% sustainably certified soy at all production sites by 1.1.2025; certifications in accordance with the FEFAC guideline, see Declaration of Commitment of the European Feed Manufacturers' Federation (as of October 2021).	
BEWITAL agri		Aims to use 100 % sustainable palm oil in Germany as of 1.1.2022	Currently, 65% of the soy used is sustainably certified; the aim is to use only non-GMO soy from sustainable cultivation, preferably Donau Soja.	

AGRAVIS Raiffeisen	✉	Aims to use 100 % sustainable palm oil in Germany and beyond from 1.1.2022	Advocacy for conversion; Commitment to deforestation-free soy under the Amazon Soy Moratorium. (It aims to prevent the sale and financing of soy from Amazon land cleared after 2008.)		According to AGRAVIS, in the past ten years it has changed its compound feed so that 40 percent less soy extraction meal was consumed. In return, the proportion of domestic feed increased, e.g. 15 per cent more grain was fed and 25 per cent more rapeseed extraction meal.
Heinrich Nagel	✉	Aims to sell all palm-based fractionated dry fats in the animal feed sector in the DACH region with sustainable certification by 31.12.2025.	No use of soy components	Rapeseed oil and olive oil are also used, but a complete substitution of palm oil is not currently planned for nutritional reasons and because of land requirements	No use of soy components
GS agri	✉		Sustainable certified soy is already used (in addition to RTRS and Pro-Terra, other FEFAC-listed systems such as ISCC+ and COAMO).		
Hauptgenossenschaft Nord	✉		Aims to use 100% sustainably certified soy by 2025 (all soy imported by the Group).		
H. Bröring	✉	No target date yet for achieving 100% sustainable palm oil, as the company is currently unable to pass on the costs of certification to the downstream food chain.	Soy from Brazil is sourced sustainably certified (Pro-Terra), approx. 40% of the soy meal is GMO-free, so far no target date for achieving 100% sustainable soy, as the company is currently unable to pass on the costs for certification to the downstream food chain.	The share of palm oil and derivatives is currently approx. 0.23% of the company's total feed production volume; sustainable palm oil is welcomed and substitutes such as animal fats or pure vegetable oils (sunflower oil, linseed oil, rapeseed) are also used.	approx. 20% of imported soy meal consumption has been replaced by European alternatives in the last 5 years
PHW Group (incl. Mega Tierernährung and Wiesenhof)	✉		Only Wiesenhof already uses sustainably certified soy		
BayWa AG	✉	No palm oil products are traded	The share of European and/or ProTerra-certified soy was increased from 1.5% (2015) to approx. 29% (2020); close exchange with main suppliers on sustainability issues	No palm oil products are traded BayWa AG only trades vegetable oils in the feedstuff sector to a limited extent - rapeseed oil is exclusively of European origin and soy oil is predominantly of European origin.	Expansion of trade volumes of alternative protein feeds such as rapeseed meal, DDGS, sunflower meal and legumes from European production
Cefetra Group (Baywa subsidiary)	✉	Sustainable certified palm oil is offered upon customer request with no target date for full conversion; however, the 2019 ACOP report has historically stated a target of 100% sustainable palm oil by 2025.	Sustainable certified soy is offered (RTRS, ProTerra and Cefetra Certified Soy (CCS) - around 1.1 out of 2.2 million tonnes of soy certified sourced in 2020, no target date for full conversion given yet; commitment to sustainable soy farming	As an alternative to palm oil, Cefetra supplies European rapeseed and soybean oil to the European market.	Most of the products supplied by Cefetra come from Europe, and in particular products such as sunflower seeds, rapeseed, horse beans, field peas and lupins can be interesting products to replace imported proteins.

			in South America and EU target markets (UK roundtable, Dutch Sustainable Soy platform), tracking projects with suppliers and customers to demonstrate zero deforestation		
Volac Wilmar Feed Ingredients Holdings Limited	✉	Palm oil must be sustainably certified (RSPO) or meet NDPE criteria (see below); It is expected to use 100% sustainably certified palm oil only from 2030 onwards (RSPO ACOP report 2019); in 2020 there was a certification share of only 1.15%; a purchasing policy with criteria on 'No Deforestation, No Peat and No Exploitation' (NDPE) is used for own mills/plantations (WILMAR) as well as for third parties (see VWFI Limited Palm Oil Sustainability Policy).	Soy is not processed or traded	Offer products made from rapeseed oil with concentrated palmitic and oleic acid (e.g. Mega-Euro 16); use e.g. for dairy cows.	Soy is not processed or traded
ADM Animal Nutrition	-	Target set to use 100% deforestation-free raw materials only from 2030; own ADM purchasing guidelines established on sustainable palm oil DUH comment: There are three ADM refineries in the EU, which are managed by Olenex⁴⁰, and four more refineries in the USA. Olenex is a joint venture between ADM and Wilma (as of January 2022).	Target set to use 100% deforestation-free raw materials only from 2030; own NDPE purchasing guidelines established.		
Meat processing (partly incl. animal husbandry) (7 companies)					
Danish Crown	✉	Halving palm oil consumption from 2022 and 100% sustainable palm oil (certificates)	By 2025, 100% sustainable deforestation-free certified soy (incl. legal and illegal deforestation)	Phase out palm oil feed by 2023, i.e. no further use of palm oil in feeding.	By 2023-2025, up to one third of protein feed through domestic protein sources from Denmark
Wiesenhof (subsidiary of the feed producing PHW Group, see above)	✉		100% sustainably certified soy is already used (ProTerra and RTRS).		
Tönnies				Phase out palm oil by 2030	Phase out South American soy by 2030

⁴⁰ Olenex states the origin of the palm oil: "The main producing countries are located in Southeast Asia (Indonesia, Malaysia, and Papua New Guinea), Latin America (Guatemala, Colombia and Honduras), and in Africa (production for their home markets)". "As of January 2022, Website Olenex

Westfleisch		<p>There is still no requirement to use only sustainably certified palm oil. Westfleisch states: "According to estimates, the highest use of palm oil in compound feed is in poultry and laying hen husbandry. In pig feeding, the use of palm oil can be described as low. There, the use of palm oil in compound feed production is only 8%, while the percentage of palm oil in the feed ration of pigs is < 1%. The use of palm oil as a feed component in cattle farming is negligible and falls below the 2% of palm oil use in compound feed production for other livestock species. For all livestock, the palm oil content in the feed composition or ration can be described as very low. At Westfleisch, only pigs and large livestock are slaughtered. Therefore, after further consultation, palm oil will not be included in the QS scheme for the time being". (as of November 2021)</p> <p>Note: DUH expects ALL palm oil being sourced 100% sustainably - no matter which share in the final product. This applies not only to fodder but also to food and hygiene products, for instance.</p>	<p>According to Westfleisch, the establishment of the Initiative Tierwohl (engl. Animal welfare) confirms the expectation that the course must also be set for the use of sustainable feed. An industry solution is being sought and driven forward according to Westfleisch. Currently, the goal is being worked out together with QS GmbH to use only certified, deforestation-free feed for animals in the QS scheme from 1 January 2023 at the latest. The company is committed to a quick binding solution. "Which certification systems, trade models and further requirements will be necessary from 01.01.2023 for the feeding of sustainable soy to QS-certified pigs and large livestock (QS GmbH: https://www.q-s.de/)⁴¹ is currently being worked out in a working group. It has been agreed that the feed industry, together with the food producers (e.g. meat producers), will develop a QS module to ensure the exclusive use of sustainable, deforestation-free soy in feeding. A publication of the QS GmbH concept for the use of sustainable, deforestation-free soy is planned for January 2022⁴². "(Status November 2021)</p>		
Rothkötter Group (incl. feed production of Rothkötter Mischfutterwerke)			Soybean meal exclusively from non-amazon areas; still great lack of clarity, e.g. regarding compliance		

⁴¹ As a general rule, our QS-certified contract farms only use feed materials approved by the QS scheme in accordance with the positive list of the German Agricultural Society (DLG). (DLG). The purchased compound feeds and straight feeding stuffs are exclusively sourced from QS-recognised manufacturing companies, which are themselves inspected and recognised by QS GmbH.


⁴² The announced publication is not yet available (as of 26 January 2022). An information statement in the magazine "qualitas" gives an outlook (issue of 6 January 2022): "The QS advisory boards for beef and pork as well as poultry have decided that QS should increasingly deal with the topic of sustainability in the future. Comparable to the QS add-on module for the use of GMO-free feed, modules on the topic of sustainability at the feed level are planned for this in the near future. Like all other QS criteria, they will be reliable, traceable and transparent. In a first step, additional modules are conceivable which, for example, set requirements for the purchase of soy and palm products and also take into account the issue of freedom from deforestation. A supply and traceability system could be established via QS all the way to the food retail trade.

			with freedom from deforestation in the Cerrado area and lack of information on the possible use of certifications to prove deforestation-free cultivation.		
Sprehe Feinkost					
Vion N.L.					
Poultry industry (small selection of laying hen farmers and egg product manufacturers) ⁴³ (8 companies)					
Biovum incl. Eggerhof (BioRegio business)	✉	The feed used does not contain palm oil	No use of overseas soy	The feed used does not contain palm oil	100% European organic soy from D, IT, AUT, ROU is used (feeding according to Bioland with 100% organic fodder and at least 50% of the fodder from the own farm or from regional cooperation).
Vriesen-Hof	✉	According to the feed supplier, the feed used does not contain palm oil.	The overseas soy contained in the feed comes from Brazil (Pro-Terra certified), Canada and India (only GMO-free), according to the feed supplier. (Information from the feed supplier)	According to the feed supplier, the feed used does not contain palm oil; therefore alternative vegetable or animal fats are used	In addition to overseas soy, the feed used also contains field beans as well as Romanian and Russian soy; in future, the soy will preferably come from Canada and Europe, sustainable South American soy will be used in the event of bottlenecks (information from the feed supplier).
Gutshof-Ei	✉	According to the feed supplier, the feed used does not contain palm oil.	The feed contains 100% sustainably certified soy (Pro Terra, RTRS) or European soy (if soy is included) according to the feed supplier.	According to the feed supplier, the feed used does not contain any palm oil, so alternative vegetable or animal fats are used.	Partial organic husbandry according to the EU Organic Regulation contributes to the promotion of domestic feedstuffs through a specified minimum share (however, the use of up to 5% non-organically produced soy is possible).
Geflügelhof Onken				Partly organic husbandry, therefore partly feed with alternative vegetable or animal fats from organic farming. (Organic palm oil is currently not included in animal feed according to the FONAP study).	Partially organic husbandry according to the EU Organic Regulation contributes to the promotion of domestic feedstuffs through a specified minimum share (however, the use of up to 5% non-organically produced soy is possible).

⁴³ Around 80% of palm oil in feed is used in broiler and layer farming. 10% of palm oil is used in artificial milk replacers in calf rearing and 8% in pig farming. 2% is fed to other farm animals. Alternatives to palm oil are already being used in some cases. (Meo Carbon Solutions, 2018)

Hühnerhof Heidegold				Partly organic husbandry, therefore partly feed with alternative vegetable or animal fats from organic farming. (Organic palm oil is currently not included in animal feed according to the FONAP study).	Partially organic husbandry according to the EU Organic Regulation contributes to the promotion of domestic feedstuffs through a specified minimum share (however, the use of up to 5% non-organically produced soy is possible).
OVOBEST Eiprodukte				Supplies egg products from organic farming on request, therefore partly feed with alternative vegetable or animal fats from organic farming (organic palm oil is not currently included in feed according to the FONAP study).	Supplies egg products from organic farming on request, therefore partly feed with alternative vegetable or animal fats from organic farming (use of up to 5% non-organically produced soy in EU organic); egg products from farming with soy-reduced feed ration.
Eifrisch Vertriebsgesellschaft				Partly egg products from EU organic farming, therefore partly feed with alternative vegetable or animal fats from organic farming. (Organic palm oil is currently not included in animal feed according to the FONAP study).	Partly egg products from EU organic farming, therefore partly feed with alternative vegetable or animal fats from organic farming (use of up to 5% non-organically produced soy).
Schukarle-Hof					

Dairy industry (incl. dairies and dairy farming)

Hochland Germany		The feed used by German farmers does not contain palm oil. The vegetable raw materials for basic feed and milk performance feed (concentrate) for dairy cows may only come from Europe: "The contract farmers of Hochland Deutschland GmbH have already committed themselves since 1 July 2020 to only feeding their dairy cows feed that comes exclusively from Europe. This regulation applies to basic and concentrated feed for the dairy cows. In France, our milk suppliers only feed your dairy cows feed without genetic engineering (oGt) in accordance with the VLOG standard	The feed used by German farmers does not contain any overseas soy. The vegetable raw materials for basic and milk performance feed (concentrate) for dairy cows must come exclusively from Europe. So far, no information is available on the applicable requirements of the Hochland Group for palm oil and soy for production sites outside Germany, i.e. regarding France, Spain, Poland, Romania and Russia.	The contract farmers of Hochland Deutschland GmbH in Germany have committed themselves to using only European feed since 1 July 2020.	The contract farmers of Hochland Deutschland GmbH in Germany have committed themselves to using only European feed since 1 July 2020.
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		and the French oGT legislation. "			
		So far, no information is available on the applicable requirements of the Hochland Group for palm oil and soy for production sites outside Germany, i.e. regarding France, Spain, Poland, Romania and Russia.			
Arla Foods	✉	<p>New strategy on sustainable feed incl. sustainable palm oil announced.</p> <p>According to Arla, palm oil hardly plays a role in the feeding of cows at Arla farmers and only accounts for about one per cent of the total feed composition. Currently, Arla has no specific policy on the origin of palm oil used as feed (palm fatty acid distillate, PFAD). Arla is still discussing with its cooperative members, the farmers, an overall strategy for sustainable (European) feed, including palm oil. (October 2021) ARLA will discuss with the Board of Directors about strengthening the approach to responsible feed. This will lead to a new position before the summer (as of January 2022).</p>	100% sustainably certified soy has been used by all European member farmers since 2014: For Arla farmers, the soy content in feed is between zero and ten percent, depending on the country; purchasing guideline for sustainable soy, only organic standards, ProTerra or the Round Table for Responsible Soy (RTRS) are accepted physically or as an RTRS certificate.	New strategy on sustainable feed incl. increased use of rapeseed oil announced	New strategy on sustainable feed including increased use of domestic raw materials announced.
Zott	✉	No information on the residual amount of palm oil purchased, if applicable.	No indication of any residual quantity of soy purchased.	98% of individual or compound feeds from geographical Europe by German milk producers, 90% by Polish producers (target of 100% aimed for, target year not specified).	98% of individual or compound feeds from geographical Europe by German milk producers, 90% by Polish producers (target of 100% aimed for, target year not specified).
Deutsches Milch Kontor			Partial purchase of sustainable soy meal (share unknown)		Partial renunciation of soy depending on the farm
Hochwald					
Friesland Campina Germany	✉	The following applies to German members and suppliers: palm products are not included in the feeds and are completely excluded; only feeds from countries that are geographically entirely in Eu-	The following applies to German members and suppliers: the soy contained in the feed either comes from Germany or is certified Donau Soja; only feed from countries that are geographically entirely in Europe is used;	The following applies to German members and suppliers: palm products are not included in the feed and are completely excluded; only feed from countries that are geographically entirely in Eu-	The following applies to German members and suppliers: the soy contained in the feed either comes from Germany or is certified Donau Soja; only feed from countries that are geographically entirely in Europe is used;

		rope are used; the specifications are contractually fixed between feed manufacturer, farmer and dairy and are monitored and audited internally and externally.	the specifications are contractually fixed between the feed manufacturer, farmer and dairy and are monitored and audited internally and externally.	rope is used; the specifications are contractually fixed between feed manufacturer, farmer and dairy and are monitored and audited internally and externally.	the specifications are contractually fixed between the feed manufacturer, farmer and dairy and are monitored and audited internally and externally.
Fude & Serrahn Milchprodukte					
MEGGLE					
Bayernland					
Unternehmensgruppe Theo Müller					
Food trade (18) > 1 billion turnover in 2018)					
Lidl Germany	✉	Target to ensure 100% sustainable palm oil feed for all product groups with animal products by 1.1.2022 (Lidl Germany's own brands); review and, if necessary, sanctioning of external brands planned.	Target to ensure 100% sustainable soy feed for all product groups with animal products by 31.12.2022 (Lidl Germany's own brands, use of e.g. ProTerra, RTRS and Donau Soja or Europe Soya); certification share currently at 73%; review and, if necessary, sanctioning of third-party brands planned.	Increased use of alternative feedstuffs; the substitution of palm oil with alternative raw materials is being examined.	In the long term, more domestic feeds are to be used; about one third of the suppliers of animal products are working on the substitution of soy as a feedstuff
Kaufland	✉	The company already uses 100% sustainably certified palm oil in accordance with the RSPO standard for its food and non-food ranges, in line with the FONAP voluntary commitment. In addition, Kaufland is involved in the FONAP membership projects with the aim of promoting more sustainable cultivation methods in the countries of origin, whereby project planning and implementation always takes place in close cooperation with local smallholder representatives. Kaufland also makes use of the possibility to directly support small farmers by purchasing certificates (IS-CSPO). This option complements the approach of using only certified palm oil. Kaufland wants to continue this commitment and will also examine its options for	Publication of the position paper "Sustainable soy as animal feed" in January 2022: Kaufland aims to eliminate deforestation and land conversion in its value chains, especially of soy. To this end, from 1.1.2022 it is to be ensured for selected own-brand products with animal products that only soy from sustainable, deforestation-free cultivation in accordance with the RTRS, ProTerra and Donau Soja/Europe Soja certification systems is used (the cut-off date for deforestation is thus the year 2009). As a transitional measure, non-certified quantities of soy will be covered by certificates or credits from the aforementioned systems in 2022 - until physical procurement is fully implemented by farmers. The use of segregated commodities is targeted in	Promotion of organic products	Together with Lidl, commitment to increased soy cultivation in Europe; in the product line "K-Wertschätze Quality Meat Programme", at least 50% of the feed must come from the region (unclear whether all components are also sourced regionally) and domestic protein plants are to be promoted.

		actively supporting sustainable palm oil cultivation in the area of palm oil as animal feed. (as of January 2022)	the medium term. <u>The date by which all commodity groups will have been converted and which countries this will include will be specified again in 2022.</u> (as of January 2022)		
ALDI (The "ALDI" brand includes the ALDI SÜD Group and ALDI NORD Group; additional information on the two Groups is provided below.)		ALDI SÜD & ALDI Nord Group of Companies: No more deforestation in connection with high-priority supply chains from the end of 2030 at the latest. Last possible cut-off date 2020. <u>Announcement of the publication of an international position paper with commodity-specific targets and actions in the first half of 2022 with reference to palm oil and soy.</u>	ALDI SÜD & ALDI Nord Group of Companies: No more deforestation in connection with high-priority supply chains from the end of 2030 at the latest ⁴⁴ . Last possible cut-off date 2020. <u>Announcement of the publication of an international position paper with commodity-specific targets and actions in the first half of 2022 with reference to palm oil and soy.</u>	ALDI SÜD & ALDI Nord Group of Companies: Offer organic products	ALDI SÜD & ALDI Nord Group of Companies: Supporting the increased use of domestic protein sources
- Unternehmensgruppe ALDI SÜD & ALDI SÜD Germany	✉	ALDI SÜD Group: A switch to sustainably certified palm oil is advocated, but so far there is no specific deadline for the conversion of the own supply chains. <u>With regard to animal feed, ALDI SÜD is currently checking the quantities of palm oil in animal feed as part of the annual Collective Soy Reporting. (as of November 2021)</u>	ALDI SÜD Group: Determination of the soy footprint since 2017 and collection of the "Collective Soy Reporting" since 2018; membership in various multi-stakeholder groups ⁴⁵ ALDI SÜD Germany: Use soy animal feed from exclusively deforestation-free origins <u>by the end of 2025</u> (ensure for all commodity groups, including poultry, pork, beef, shell eggs). By the end of 2025, at least half of the total soy feed used should come from physical supply chains. Status quo: The certification share of deforestation-free soy in supply chains was 39% in 2020, according to Collective Soy Reporting. Measures: Obligation for poultry, beef, pork and shell egg suppliers to use only sustainable soy for feed from 01.08.2021 ⁴⁶ ; Products affected: fresh,	see above	see above ALDI SÜD Germany: The origin of the soy in vegan and vegetarian products is already Germany, Austria, France or the USA - not South America. <u>To support regional, European soy cultivation, ALDI SÜD Germany 2021 has become a member of the Donau Soja Initiative. (Status November 2021)</u>

⁴⁴ Further information at: <https://www.aldi-sued.de/de/nachhaltigkeit/umwelt/schutz-der-waelder.html>

⁴⁵ Retail Soy Group (RSG), Roundtable on Responsible Soy (RTRS), Soy Transparency Coalition (STC), Cerrado Statement of Support Group, further information at: <https://www.aldi-sued.de/de/nachhaltigkeit/umwelt/schutz-der-waelder/soja.html>

⁴⁶ <https://www.aldi-sued.de/de/nachhaltigkeit/umwelt/schutz-der-waelder/soja.html>

			<p>frozen and processed meat, i.e. chilled raw or processed meat such as sausage and cold cuts as well as raw and cooked (coloured) eggs.⁴⁷</p> <p><u>Requirement:</u> Origin of the soy from regions without deforestation for soy cultivation areas, e.g. Europe; if originating in South America, the soy must be certified according to a standard accepted by ALDI (RTRS, ProTerra, Donau Soja/Europe Soya, ISCC Plus, SFAP Non-Conversion, CRS Cefetra/BFA, Cargill Triple S, ADM Responsible Soy Standard and Bunge Pro S.); purchase of credits accepted as a transitional solution (preferably RTRS credits) to directly support sustainably certified farms.</p> <p><u>Memberships & engagement to share and establish industry-wide solutions for sustainable soy</u>⁴⁸</p> <p>(as of November 2021)</p>		
- Unternehmensgruppe ALDI NORD	✉	<p>Participate for the first time in Collective Soy Reporting to examine deforestation risk along global supply chains, ensure the effectiveness and efficiency of current and future measures, and identify where the greatest impact can be made; In addition to soy, the relevance of palm oil in animal feed is also reviewed (as of November 2021)</p>	<p>Participate for the first time in Collective Soy Reporting to examine deforestation risk along global supply chains, ensure the effectiveness and efficiency of current and future measures, and identify where the greatest impact can be made; In addition to soy, the relevance of palm oil in animal feed is also reviewed (as of November 2021)</p>	see above	<p>see above</p> <p>The origin of the soy in vegan and vegetarian products is already Germany, Austria, France or the USA - not South America.</p>
REWE Group incl. Penny (Lekkerland is not yet included in the reporting for 2019)	✉		<p>100% sustainable soy guaranteed for eggs, milk and fresh poultry meat at REWE and PENNY private labels (Pro Terra, ISCC+, Donau Soja/Europe Soya and RTRS); until 31.12.2021 also for fresh beef and pork; no targets for non-fresh meat products, dairy,</p>	Offer organic products	<p>Promotion of organic products, the aim is to gradually reduce soy from South America and use European soy as well as alternative domestic protein sources, has been supporting Donau Soja from Croatia since 2015</p>

⁴⁷ Comment DUH: Why the regulation is not extended to the producers of aquaculture products (e.g. salmon), butter and dairy products before 2025 remains unclear. In DUH's view, a complete changeover in the DACH region from 1.1.23 should be aimed for.



⁴⁸ Forum for More Sustainable Protein Feed (FONEI), WWF Working Group on Deforestation-Free Soy Supply Chain, participation in QS-AG Feed and Sustainability

			cheese and aquaculture products and butter		(220 farmers have produced 55,000t of soy so far)
EDEKA	✉	According to EDEKA's understanding, palm oil in animal feed is only an ingredient, e.g. as a carrier. Therefore, EDEKA currently has no requirement to use sustainably certified palm oil in feed for its mopro or sausage and meat products; the focus is on further developing the sustainable certification level of palm oil, which is used in significant quantities in own brands.	Conversion to more sustainable, certified soy targeted on the basis of RTRS, ProTerra, Donau Soja and Europe Soya (no target year), pilot project Hofglückprogramm in the meat/sausage segment with sustainable soy feed since 2018; laying hen feed almost completely converted to more sustainable certified soy; expansion of the range of products from more responsible aquaculture using certifications such as ASC or GlobalGAP, partly also as part of projects	EDEKA only checks when using palm oil in food where it is possible to switch to other vegetable oils without causing new ecological problems; a binding requirement is therefore that only certified sustainable fats may be used as substitutes; EDEKA basically follows the recommendations of WWF Germany regarding the use of more sustainable palm oil substitutes	Statutory interim targets or targets for the conversion of own brands to European or certified soy feeds were not achieved (targets related to article quantities in 2012): Conversion in dairy cattle feeding in the DACH region for 85% of dairy products by 30.06.2020; for cheese products 75% by 30.6.2021 Pilot projects for conversion in meat and sausage products not yet realisable
Netto	✉	According to Netto, palm oil is only an ingredient in animal feed, e.g. as a carrier. Therefore, Netto currently has no requirement to use sustainably certified palm oil in feed for dairy or sausage and meat products. Netto focuses on the further development of the sustainable certification level of palm oil in the private label sector.	Long-term conversion to sustainable, certified overseas soy or European soy in pig, cattle and poultry feed aimed for on the basis of RTRS, ProTerra, Donau Soja and Europe Soya (no target year), pilot projects with sustainable soy in laying hen floor husbandry and the own brand "Gourmet" for frozen chicken, aim of conversion to exclusively sustainable fish products and seafood incl. farmed fish (e.g. ASC).	If suppliers use substitutes for palm oil/fat, this must be checked in terms of sustainability. If there is no need to use substitutes, Netto continues to demand the use of RSPO-certified palm oil.	Statutory interim targets or targets for the conversion of own brands to European or certified soy feeds were not achieved (targets related to item quantities in 2017): for dairy products, 20% and 40% of item quantity to be converted by 30.6.2020 and 2022 respectively; for butter, a conversion of 50% is targeted by 30.6.2022; for cheese products, conversion of 75% of the article quantity in the DACH region by 30.6.21 (50% in 30.6.20); pilot projects with sustainable, European soy in the meat/ pig feed segment (farmers from Central Franconia, Upper Franconia and Lower Franconia use exclusively soy of European origin).
Metro Group incl. Rungis express	✉	Supplier discussions have been initiated; a Dutch meat supplier, for example, states that sustainably certified palm oil is used in small quantities and donated to sustainability projects in Latin America; engagement in the Consumer Goods Forum (CGF) in the Forest Positive Coalition, e.g. for indicator-based reporting on deforestation-free supply chains.	By 31.12. Ensure 100% sustainable soy in feed by 2025 - this applies to all countries where MERO operates internationally (after poultry, pork and salmon, beef, shrimp and dairy should be included depending on the target market); use RTRS certification (credits or physical), ProTerra or one of the FEFAC purchasing guideline certifications); 100% certified soy is already used in own-brand salmon farming products	Examining together with suppliers where alternatives to palm oil could be used; in the area of aquaculture, in talks with various suppliers of alternative feeds, such as the company Veramaris (DSM/Evonik) (replacement of fish oil with algae oil).	Promotion of products from organic farming with minimum shares of regional feed (EU organic and Naturland); in the area of aquaculture in talks with various suppliers of alternative feeds, such as the company Protix (insects as feed to replace soy)

			that are purchased centrally; third-party brands should be motivated to make sustainable transformation		
dm	✉	Only very few dmBio baby products with very small amounts of organic or Demeter-certified meat (palm oil is not currently fed in organic farming); Milk is Naturland-certified and no palm oil or soy is used in the feeding process	Only very few dmBio baby products with very small amounts of EU organic or Demeter certified beef (only in the case of pork or poultry can conventional soy be fed up to 5% in organic farming); the suppliers mainly use organic or Demeter soy from the EU or from their own cultivation); Milk is Naturland-certified and no palm oil or soy is used in the feeding process	Only organically grown alternatives are fed (palm oil is currently not fed in organic farming).	Only a few products with organic beef under dmBio-Baby (suppliers mainly use organic or Demeter soy from the EU or from their own cultivation); Predominantly vegetarian organic food (dmBio) in the range, which is over 75% vegan
Rossmann	✉	60% of all Rossmann foods with EU organic (84% for baby food), in addition also Bioland (sporadically since 2020) and Naturland (Note by DUH: Organic palm oil has not yet been fed in organic farming).	60% of all Rossmann food with EU organic (84% for baby food), in addition also Bioland (sporadically since 2020) and Naturland (conventional soy can be fed up to 5% in organic farming)	60% of all Rossmann foods with EU organic (84% for baby food), in addition also Bioland (sporadically since 2020) and Naturland (Note by DUH: Organic palm oil has not yet been fed in organic farming).	60% of all Rossmann foods with EU organic (84% for baby food), in addition also Bioland (sporadically since 2020) and Naturland
Globus	✉	General position on palm oil: palm oil should be replaced if possible or, if this is not possible, it should come from certified cultivation.	Focus so far on GMO-free soy	General position on palm oil: palm oil should be replaced if possible or, if this is not possible, it should come from certified cultivation.	Advocate of the use of EU soy and in close exchange with Donau Soja; "However, the cultivation of European soy is not yet on the scale to cover the entire European market. For this reason, we are currently refraining from making EU soy mandatory for our suppliers.
Bartels-Langness Group (incl. familia, MARKANT, Citti)					
Transgourmet Germany (part of the Coop Group)	✉	Probably, end of 2021 publication of the multi-year sustainability targets 2022 -2026 with tightened targets with key dates for 100% sustainable procurement and full traceability of palm oil and animal products; so far promotion of organic products and the own brand "Ursprung", which is oriented towards organic specifications.	Probably, end of 2021 publication of the multi-year sustainability targets 2022 -2026 with tightened targets with key data for 100% sustainable procurement and full traceability of soy and animal products; so far promotion of organic products and the own brand "Ursprung", which is oriented towards organic specifications, currently supplier surveys on soy feed from the Amazon region	Promotion of products from organic farming with minimum shares of regional feedstuffs	Promotion of products from organic farming with minimum shares of regional feedstuffs



Norma	✉	Supports the goal of conversion while indicating limited own influence on upstream suppliers and wants engagement of leading food retailers due to their market coverage of approx. 85%. In regular exchange with the suppliers regarding the topic (as of October 2021)	Supports the goal of conversion and at the same time indicates limited own influence on upstream suppliers and would like to see engagement of the leading food retailers due to their market coverage of approx. 85%. In regular exchange with the suppliers regarding the topic⁴⁹ (as of October 2021)	Offer organic products	Offer organic products
Bünting (incl. Combi, familia, Markant Nordwest)	✉	Supports the goal of switching to sustainable palm oil and is already in discussion with suppliers of own brands to commit them to adapt production in the future (submit a cut-off date if necessary)	Supports the goal of switching to sustainable soy and is already in talks with suppliers of own brands to commit them to adapt production in the future (submit a deadline if necessary).	partly organic products, therefore partly feeding with alternative vegetable or animal fats from organic farming (Organic palm oil is currently not included in animal feed according to the FONAP study).	Partly organic products, which contribute to the promotion of domestic feed through specified minimum share (however, use of up to 5% non-organically produced soy is possible).
tegut...	✉	Conversion to sustainable overseas feed is advocated; so far no targets for the exclusion of non-certified overseas goods; the focus of tegut... is on the further conversion to organic animal husbandry with the use of regional and European feeds	Conversion to sustainable overseas feed is advocated; so far no targets for the exclusion of non-certified overseas goods; the focus of tegut... is on the further conversion to organic animal husbandry with the use of regional and European feeds	Organic food has a special status at tegut... due to its holistic approach, with organic meat and sausage currently accounting for 46 percent of sales; e.g. organic animal husbandry with own brand tegut...Bio (e.g. Demeter, Naturland, Bioland, Bio-kreis), contributes to the promotion of domestic feedstuffs through specified minimum share (organic palm oil is currently not contained in feedstuffs according to the FONAP study); calf rearing without milk replacers (these often contain palm oil); tegut-fairbindet UHT milk only with European feedstuffs and pasture milk products.	Organic food has a special status at tegut... due to its holistic approach, with organic meat and sausage currently accounting for 46 percent of sales; e.g. organic animal husbandry for own brand tegut...Bio (e.g. Demeter, Naturland, Bioland, Bio-kreis), contributes to the promotion of domestic feedstuffs through specified minimum share percent; more sustainable feeding of articles from the "LandPrimus" brand meat programme: long-term switch to rape-seed meal or European soy; promotion of pasture farming and clover-grass mixtures in Uckermark, Mecklenburg-Western Pomerania and Rhön; calf rearing without milk replacer; tegut-fairbindet UHT milk only with European feedstuffs and pasture-raised milk products.
Dennree Group (incl. Denns Bio-Märkte)	✉	Only organic products according to the EC Organic Regulation or private law standards of the organic farming associations (e.g.	Only organic products according to the EC Organic Regulation or private law standards of the organic farming associations (e.g.	Only organic products according to the EC Organic Regulation or private law standards of the organic farming associations (e.g.	Only organic products according to the EC Organic Regulation or private law standards of the organic farming associations (e.g.

⁴⁹ <https://www.norma-online.de/de/informationen/richtlinien-nachhaltiger-tierfreundlicher-einkauf>

		demeter, Bioland, Natur-land). (Organic palm oil has not yet been fed in organic husbandry).	demeter, Bioland, Natur-land). (Conventional soy can be fed up to 5% in organic farming).	demeter, Bioland, Natur-land). Only alternatives from organic farming are fed; Hofgut Eichigt, part of the denree Group since 2015, is an Bioland dairy farm and uses neither palm oil nor soy.	demeter, Bioland, Natur-land). (Conventional soy can be fed up to 5% in organic farming). "At our Eichigt farm, which has been part of the dennree Group since 2015 and has been a certified Bioland dairy farm since 2018, neither palm oil nor soy (not even European soy) is fed or bought in. Instead of soy, we feed home-grown field beans and lupins." ⁵⁰ (November 2021)
Dohle (incl. Hit and other Dohle members)					
Müller (drugstore)					
System gastronomy (13)					
Block Group		Chicken meat products use chicken fed exclusively with sustainably certified soy and palm oil; changeover of feed for pork in 2022; no information on dairy products, eggs and farmed fish, about 80% of dishes with beef mainly from Uruguay and Aregntinians (the animals eat pasture grass after weaning, accordingly no feeding with palm oil or soy here). Note: Deforestation-free grazing in South America was not yet the subject of this query.	Chicken meat products use chicken fed exclusively with sustainably certified soy and palm oil; changeover of feed for pork in 2022; no information on dairy products, eggs and farmed fish, about 80% of dishes with beef mainly from Uruguay and Aregntinians (the animals eat pasture grass after weaning, accordingly no feeding with palm oil or soy here). Note: Deforestation-free grazing in South America was not yet the subject of this query.	About 80% of the dishes with beef, mainly from Uruguay and Aregntinians (the animals eat pasture grass after weaning, accordingly no feeding with palm oil or soy here). Note: Deforestation-free grazing in South America was not yet the subject of this query.	National beef rearing programmes have been established that require feeding with regional feedstuffs without soy (e.g. Mecklenburg-Western Pomerania). Note: Deforestation-free grazing in South America was not yet the subject of this query.
Ikea Germany		By 2025, in all international markets, sustainable, deforestation-free palm oil feeds in pork, beef, poultry, eggs, dairy and salmon (RSPO credits or traceable and physically RSPO certified); in Europe, Canada and Australia, 100% sustainable palm oil feeds are already	Sustainable, deforestation-free soy feed in pork, beef, poultry, eggs, dairy and salmon by 2025 in all international markets (RTRS credits or traceable and physically RTRS certified); in Europe, Canada and Australia, 100% sustainable soy feed is already achieved in poultry by the end of 2021; the		

⁵⁰ <https://www.hofgut-eichigt.de/>

		<p>achieved in poultry by the end of 2021.</p> <p>So far, the target date to specify only sustainably certified, deforestation-free palm oil feed for the German and European markets has not been shifted to 2022 (as of November 2021)</p>	<p>soy feed for salmon is already 100% certified; the soy feed in livestock for the production of meatballs and sausages is 100% certified (RTRS credits from soy producers in d. Brazilian regions of Maranhau and Piaui).</p> <p>So far, the target date to specify only sustainably certified, deforestation-free soy feed for the German and European markets has not been shifted to 2023 (as of November 2021).</p>		
McDonald's Corporation	✉	No targets for switching to sustainable palm oil feed or substitution.	For broiler feed for the German market, 100% soy from sustainable cultivation (RTRS or Pro-Terra) is used. Furthermore, no information on feed for cattle and pigs.	No targets for conversion to sustainable palm oil feed or substitution	The soy in the feed of the laying hens whose products are used on the German market comes from European cultivation.
Nordsee	✉	Currently, feed is not listed in the product specifications of aquaculture products. The issue is now to be taken up in dialogue with suppliers.	Currently, feed is not listed in the product specifications of aquaculture products. The issue is now to be taken up in dialogue with suppliers.		
Subway	✉	<p>Subway® is committed to using certified sustainable palm oil in its products and is currently working to ensure that all products in Europe come from RSPO certified sources. Regarding feed, Subway® relies on a large number of local suppliers for the German market. Subway® is aiming for a complete data collection of all suppliers and will be happy to provide this information in time for next year's report.</p> <p>Subway is striving to switch to 100% sustainable feed - this is the declared goal with regard to both palm oil and soy. However, due to the large number of suppliers for the German market, it is not possible to make a binding commitment for palm oil in the feed as early as January 2022 (as of October 2021).</p>	<p>Regarding feed, Subway® relies on a large number of local suppliers for the German market. Subway® is aiming for a complete data collection of all suppliers and will be happy to provide this information in time for next year's report.</p> <p>Subway is committed to switching to 100% sustainable feed - this is the stated goal with regard to both palm oil and soy (as of October 2021).</p>	At the moment, Subway does not yet offer any products in organic quality.	At the moment, Subway does not yet offer any products in organic quality.

Autobahn Tank & Rast				Increased work on including organic products in the shopping basket in the future	Increased work on including organic products in the shopping basket in the future
Yum! Brands Restaurants Int. (incl. Kentucky Fried Chicken and Pizza Hut)		<p><u>Kentucky Fried Chicken:</u> "We are working in close coordination with suppliers to implement the commitment of RSPO-certified palm oil in feed. As a subsidiary of Yum! Brands, Inc., KFC is a global foodservice brand with over 23,000 restaurants in more than 140 countries and territories. This requires sufficient lead time to implement supply chain changes across the market in a way that is feasible for all parties involved. As soon as KFC can confirm the complete switch to 100% sustainable palm oil in feed, we will be happy to get back to you." (Status Nov 2021)</p> <p><u>Pizza Hut</u>⁵¹ : No answer so far, although the company is the fifth largest restaurant chain worldwide - on a par with Burger King (as of July 2021)⁵².</p>	No sustainability certification, but 100% of Brazilian feed mills in own supply chains audited as compliant with Amazon soy moratorium since 2019. However, a binding target on certified sustainable, deforestation-free soy feed, including a cut-off date for full conversion, is missing so far. <u>Pizza Hut:</u> No answer so far, although the company is the fifth largest restaurant chain worldwide - on a par with Burger King (as of July 2021).		
Burger King					
FR L'Osteria					
Vapiano					
Lufthansa Service Gesellschaft					
Domino's Pizza Germany					
Valora Foodservice Germany (incl. Backwerk and Ditsch)					

⁵¹ "The course for PIZZA HUT in Germany is clearly set on growth and innovation. And so AmRest (DUH note: AmRest holds the PIZZA HUT master license) plans to open over 200 new locations across Germany in the coming years together with existing and new franchise partners. In particular, the home delivery service and the new express concept will play a central role in the realization" (information from PIZZA Hut at <https://pizzahut.de/en/franchise.html>, viewed January 2022).

⁵² <https://www.gevestor.de/finanzwissen/oekonomie/rankings/die-5-groessten-restaurantketten-mcdonalds-verliert-spitzenposition-739272.html>

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