



**Global  
Witness**

**Chocolate  
giants fuel  
deforestation  
in West  
Africa's last  
rainforest**

**NOVEMBER 2025**

An investigation by Global Witness links some of the world's most popular chocolates, including Mars, Magnums, KitKat, Hersheys and Dairy Milk, to a new deforestation crisis in Liberia

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## Key findings

- Analysis of satellite and trade data alongside extensive industry interviews outlines an opaque system that allows cocoa beans from deforested farms in Liberia to flow into some of the world's best loved chocolates
- The analysis reveals that Liberia's cocoa belt lost an area of forest greater than the size of EU country Luxembourg between 2021 and 2024, with high commodity prices and rural poverty fuelling clearance for new farms
- Supply chain mapping shows how major European traders sell Liberian cocoa with high deforestation risk to big brands, often sold mixed or blended with deforestation-free cocoa from other countries, through a system called "mass balance"
- The analysis identified that these mass balance supply chains containing deforestation-linked cocoa from Liberia are certified "sustainable" by Rainforest Alliance
- One of the confectionery giants exposed to Liberian deforestation is Mondelēz, one of the few major chocolatiers consistently pushing for delays to a major EU anti-deforestation law



**A farm in the village of Gbordo, Bong County, Liberia, cleared in 2024. Rice has been planted while the farmer waits for cocoa to grow. Global Witness**

## Introduction

What is the cost of an afternoon chocolate fix? For iconic brands like Dairy Milk, KitKat and Mars, it may be some of West Africa's last rainforests.

A new investigation by Global Witness reveals how Europe's hunger for chocolate is helping to drive a new deforestation crisis in Liberia.

An analysis of satellite imagery shows the extent of the devastation, with the country's largest cocoa producing counties – known as the “cocoa belt” – losing an area of forest greater than the EU country of Luxembourg between 2021-2024.

Global Witness's on-the-ground reporting, extensive insider interviews and data analysis uncovers an opaque, untraceable cocoa supply chain that allows beans grown in deforested areas of Liberia's cocoa belt to end up in some of the world's best-selling chocolates.

Supply chain mapping shows that Hershey, Mondelez (Cadbury), Nestlé, Unilever and Mars – which together [dominate international sales of chocolate](#) – are exposed to deforestation in Liberia through their “mass balance” purchasing practices.

While none of these brands source directly from the country, Global Witness's research uncovers how the companies purchase mixed or blended cocoa products in bulk from traders buying Liberian cocoa, where this new wave of deforestation is taking place.

The mass balance system allows mixing of deforestation-free, or “clean”, traceable cocoa with untraceable cocoa from multiple origins, rendering it impossible for the chocolatiers to rule out Liberian beans entering their products.

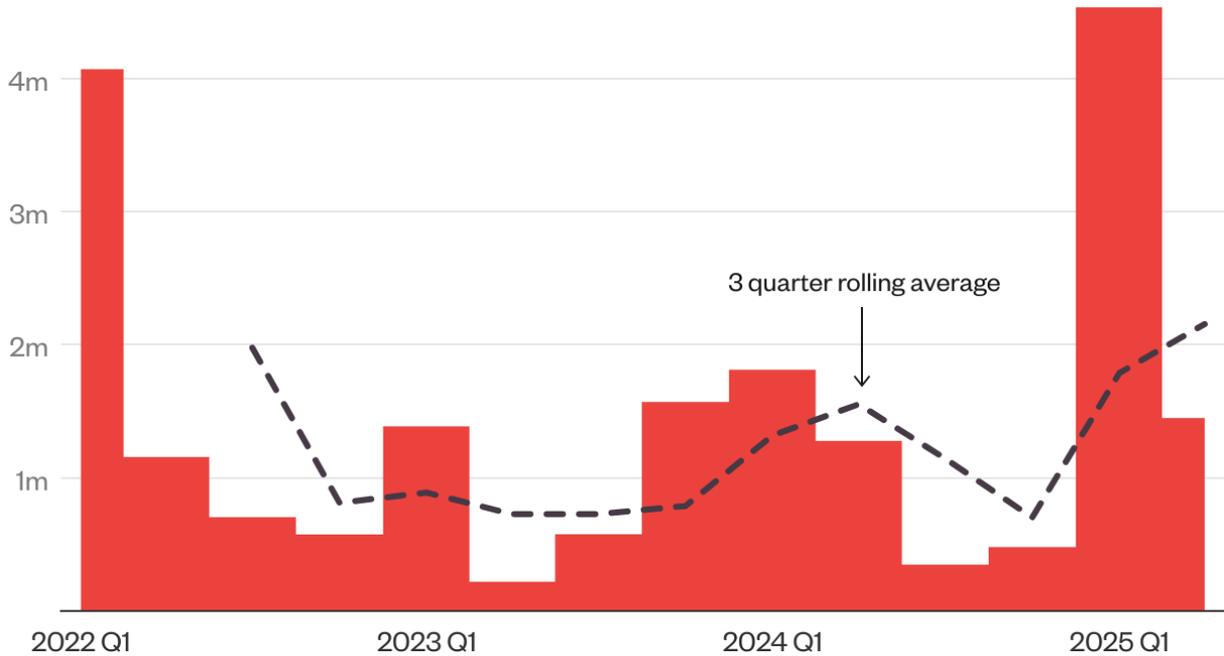
The result is an indirect supply of cocoa likely to be grown on deforested land, and a hidden Liberian deforestation footprint for the world's largest chocolate companies.

## “Black gold” scramble fuels forest destruction

Global Witness' analysis of trade data shows how major commodity houses including ECOM, Touton, OFI (Olam) and Cargill have played a crucial role in connecting Liberian beans to these chocolatiers, with more than 20 million kg of this high deforestation-risk Liberian cocoa imported into the EU between 2022-2025.

## Liberian cocoa exports to Europe are at its highest level since 2022

Gross weight in kilogrammes, 2022 Q1-2025 Q2



Source: ExportGenius



Cocoa exports from Liberia to Europe reached record levels this year, according to our analysis of supply chain data, pointing to a growing market and potentially more problems to come.

Global Witness also found that much of this chocolate resulting from this opaque, mass balance system is certified as “sustainable”.

Every trader and chocolatier sourcing Liberian cocoa beans named in this report has had their supply chain certified by Rainforest Alliance – a [business-friendly](#) green labelling scheme that this investigation suggests risks misleading consumers.

### 1. Cocoa farmers in Liberia's cocoa belt

Overall, Global Witness identified twelve cocoa farms across Liberia that had been deforested since 2021 during this research, the cutoff point from which products sold into Europe would be illegal under the EUDR.

- 🔻 **Farmers** do this because they say they can get good money by local standards for selling cocoa, a vital lifeline in a country with severe rural poverty. However, this drives the deforestation boom in the country.



Click on the buttons below to see different stages of the supply chain:

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- 2. Traders
- 3. Liberian Exporters
- 4. European and Asian Buyers
- 5. Chocolatiers

Map: Global Witness

On the ground in Liberia, Global Witness found that record international prices for cocoa are a key motivator for clearing forest to plant “black gold” in Liberia’s largest cocoa-producing counties in the north of the country.

One farmer told Global Witness: “People are going for cocoa like hell.”

Liberia’s forests are of immense importance. The country holds the largest remaining extent of the Upper Guinean Rainforest ecosystem, which plays a crucial role as a habitat for endangered chimpanzees and for regulating regional rainfall.

Global Witness visited newly cleared farms in the so called “cocoa belt” of Bong, Nimba and Lofa counties, which have lost over 250,000 hectares (ha) of forest between 2021-2024.

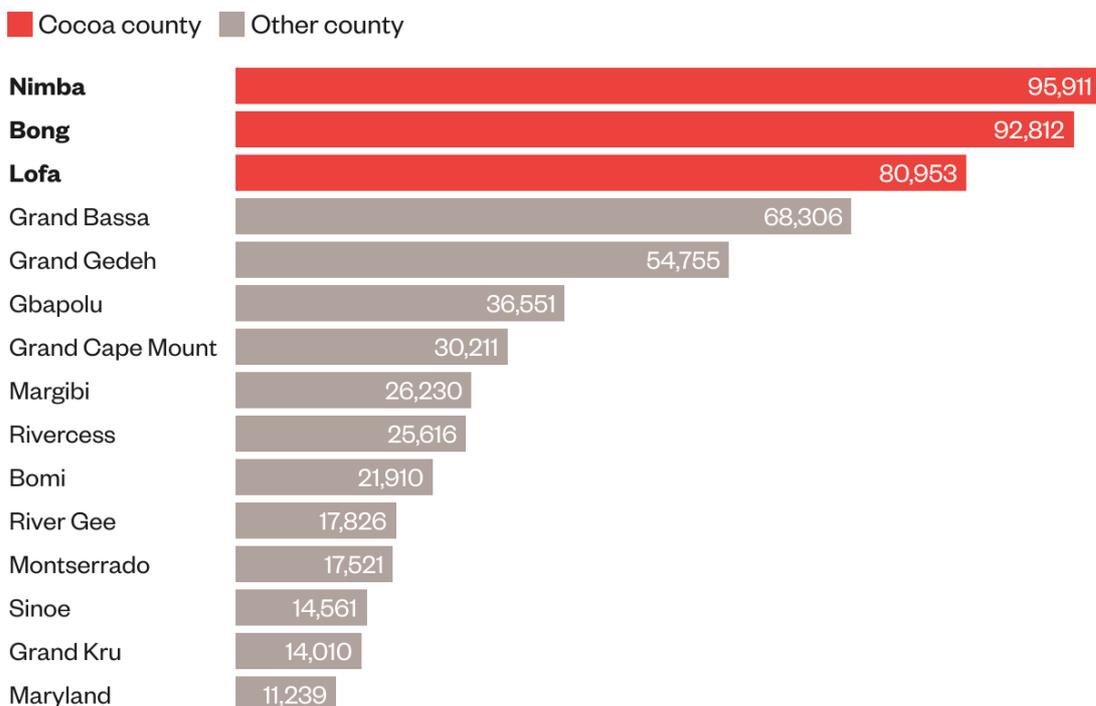
The new cocoa farms ranged from one-hectare smallholdings – almost impossible to pick up via satellite imagery – to larger plantation-style plots, with forest clearances of 40-50 ha.

Many of the farmers who spoke to us have plans to expand, suggesting this crisis may be accelerating rather than slowing down.

Global Witness’ analysis also found that these counties in the cocoa belt had suffered the highest rates of deforestation in the same period.

### Liberia's cocoa counties have high rates of deforestation

County-level deforestation in hectares using a 10% threshold level, 2021-2024



Source: Global Forest Watch

The findings come after [recent investigations](#) by Ivorian campaign group IDEF demonstrated very high rates of deforestation in Liberia's south-east, driven by a wave of migration from Ivorian and Burkinabe farmers looking for new land for cocoa planting.

Global Witness interviewed more than 30 sources in the Liberian cocoa sector, including farmers, rural traders and exporters in Liberia's capital, Monrovia.

The investigation found the entire informal system hinges on "middlemen" – rural traders in the cocoa belt who are the crucial intermediaries between small-scale cocoa farmers and the exporters.

They made it clear to our investigators that they purchased indiscriminately from any farmer that was selling.

This practice, combined with exporters' continued purchases from these middlemen, undermines any effort to procure deforestation-free cocoa and allows beans from Bong, Lofa and Nimba belt to flow freely to the capital with little to no traceability.



**Satellite view of a farm visited by Global Witness in Nimba County, where an estimated 40 hectares have been cleared for cocoa planting.**

## **Weakened EUDR harms Liberia's forests**

In response to the shortcomings of voluntary certification, a new law known as the EU Deforestation Regulation (EUDR) is due to enter into application at the end of this year.

The law will require companies selling in Europe to prove that products like chocolate are fully traceable and therefore free from deforestation.

The upcoming regulation has begun to drive a more sustainable cocoa sector in Liberia.

We interviewed several Liberian exporters that are beginning to recognise the value of traceability, mapping their supplier farms to ensure continued access to European markets and reduce their reliance on middlemen.

European cocoa campaigner Antonie Fountain told Global Witness: “I can’t imagine that this could ever have happened without the EUDR.

“In fact, I have heard several very senior private sector executives state that they have made more progress in the past two years than in the past 20 due to the upcoming law.”

These efforts may be at risk as the European Commission has now proposed a further delay to the law.

Liberian exporters told Global Witness that they have received little financial or technical support from international traders and processors – even though traders need these systems in place for upstream actors to comply – in order to meet their own incoming obligations under the EUDR.

One of the companies identified in this report as indirectly fuelling the Liberian cocoa boom is confectionery giant Mondelez. It has been a key voice lobbying for a delay to the EUDR, blaming farmers for a lack of preparation.

In contrast, other companies named in this report – such as Mars, Nestlé and Barry Callebaut – have strongly supported the law and argued against further delays.

With the EU deforestation law now under threat, Liberia’s forests face an uncertain future.

The ghost of Côte d'Ivoire's ravaged forests looms over its neighbour, offering a warning on the potential environmental cost of cocoa.

The Liberian government’s recently announced agricultural strategy aims to plant [40,000 ha of cocoa and coffee](#) in the next five years to boost rural incomes, which further risks exacerbating deforestation in the country.

Bakary Traoré – an Ivorian cocoa expert and Executive Director of IDEF – issued a dire prediction to Global Witness.

“If things continue at the current pace, it is entirely plausible to say that Liberia will find its forests in a similar position to those of Côte d'Ivoire – not in 20 years, but in 10 or even less.”

## Forests in danger: a warning from Liberia's neighbours

Liberia is home to the [largest remaining area](#) of the Upper Guinean Rainforest ecosystem which stretches from Ghana to Sierra Leone.

The country's share of this rare and critical ecosystem contains a carbon stock estimated to be equivalent to the annual CO<sub>2</sub> equivalent emissions of Japan.

These forests also provide vital resources for local communities: 70% of Liberian households collect forest products either to consume themselves or to sell – [usually for housing materials, bushmeat or fuel](#).



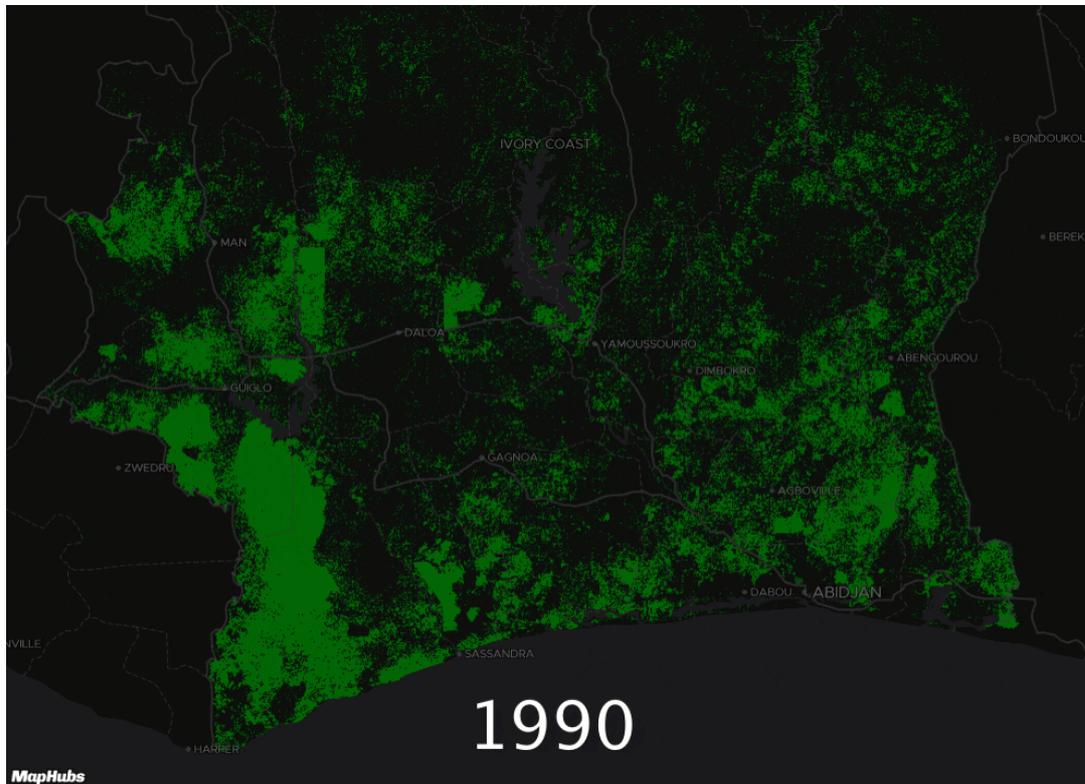
**The Kpatawee waterfalls are found in the middle of Liberia's rainforest, in Bong County. Alamy / Tommy Trenchard**

Cocoa is suited to agroforestry – growing crops alongside trees, under a forest canopy – but many farmers still rely on the destructive practice of slash and burn.

“They [the farmers] prefer making maximum use of the land. They will plant rice and cassava, intercropping with the cocoa,” says local farmer and agricultural consultant Jerome.

Yet while cocoa development in neighbouring Côte d'Ivoire and Ghana has helped bring the countries [relative prosperity](#) by regional standards, both countries have seen their forests decimated in the process.

Côte d'Ivoire now has very few remaining [forests](#) outside of protected areas, [which are now also increasingly under threat](#).



**Côte d'Ivoire's forests (in green) have been decimated by cocoa farming. Credit: Mighty Earth**

Is Liberia learning from its neighbours' mistakes, or is it heading down the same path?

Global Witness reporters flew to the country to find out more.

## More boom and bust? Meeting Liberia's cocoa farmers

Down a dirt path in Liberia, turned into a mire by relentless driving rain, our reporters came across a new farm.

Where a dense forest stood two years ago in Bong County, there are now rows of young cocoa plants.

"This is our family forest, from our father," says the farm's owner, Paul, who owns 400 acres of land.

"Before I started to plant the cocoa and banana, only the forest was here," he says, adding that he started to clear for planting in 2023.

Cutting down huge trees with just an axe is hard work, but Paul nevertheless plans to expand the farm in future.

The motivation is simple: "Cocoa has [sic] money."



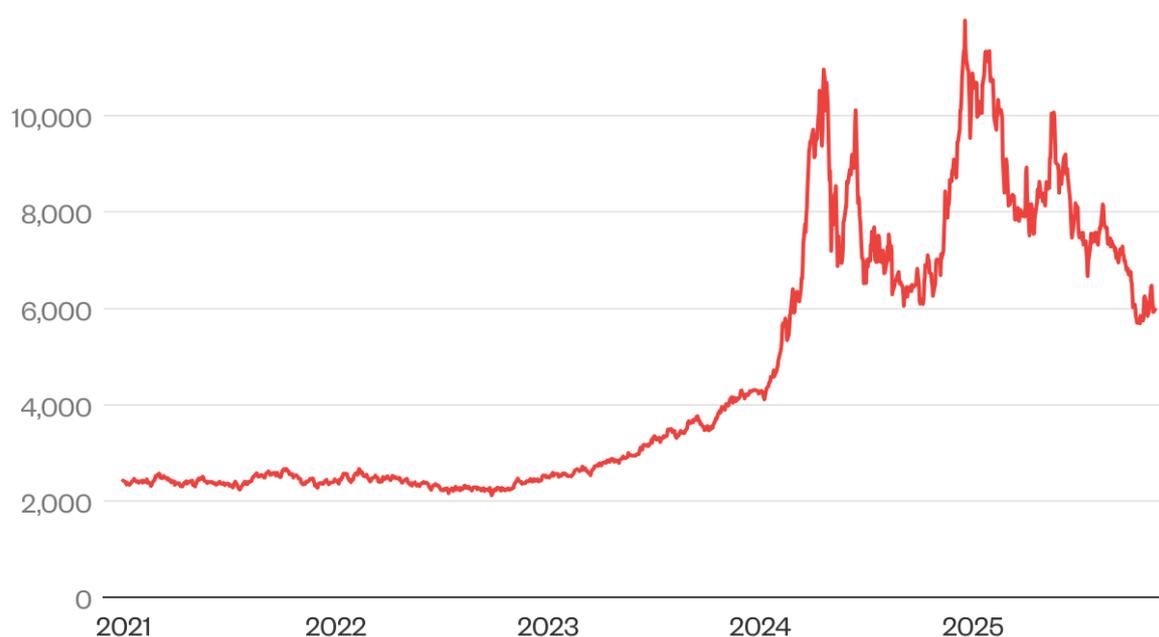
Cocoa pods on trees grown in recently deforested land in Lofa County. Global Witness

Paul isn't alone. This sentiment was echoed in interviews with farmers across Liberia's cocoa-growing regions. The high price is a vital lifeline in a country where [rural poverty is](#) especially pronounced.

The local boom is driven by a global one. The price of cocoa has rocketed globally in the last few years, due to crop failure in Ghana and Côte d'Ivoire after a cycle of flooding and drought. Together, the countries produce around [50-60% of the world's cocoa](#).

## Cocoa prices have increased

International Cocoa Organization daily price, US\$ per tonne, December 31, 2020 to November 11, 2025



Source: International Cocoa Organization. The International Cocoa Organization daily price is the average of the quotations of the nearest three active futures trading months on ICE Futures Europe (London) and ICE Futures US (New York) at the time of London close. Cocoa futures are financial agreements to buy or sell cocoa at a future date based on the latest price.

Like its neighbours, the Liberian climate is suited for cocoa growing, but unlike them, the price of cocoa is only loosely controlled by the government.

“The farm-gate price for cocoa in Liberia is currently about three times higher than in Ghana and Côte d'Ivoire,” says Darwon, a cocoa farmer from Nimba county.

To capitalise on the rise in cocoa prices, new farms are springing up across Bong, Nimba and Lofa counties, Liberia's cocoa heartland.

Unsurprisingly, it is these same counties that have seen the country's highest deforestation rates since 2021.

## Deforestation in Liberian cocoa belt in hectares, 2021-2024

Zoom to see the deforestation rates for each county.



 Global Witness

The promise of the trade is also creating a phenomenon where Ivorian and Burkinabe farmers and workers are [crossing the border to plant cocoa](#) in Liberia's south-eastern counties, further accelerating forest loss in the country.

Ironically, the ecological changes brought about by this deforestation may lead to the industry's own downfall, as seen with the crop failure in Côte d'Ivoire and Ghana that drove up prices.

French researcher François Ruf highlighted the [“boom and bust”](#) cycle of the cocoa sector over 30 years ago.

Ruf highlighted how mass deforestation for cocoa leads to a lack of rainfall and more pests, causing a fall in cocoa productivity that leads farmers to new pastures to repeat the process.

“Liberia's cocoa boom is a good example of the historical and universal pattern of such booms,” wrote Ruf last year.

Farmers like Paul and Darwon told us where to look next to understand the trade: they sell to traders in the regional capitals.

“You can sell it by the cup. People come around to buy from the local farms, measure it, and sell it for \$5 dollars a cup,” a farm manager named Akin tells us.

“Or people go to Gbarnga [the capital of Bong County] and sell it on the side of the street.”



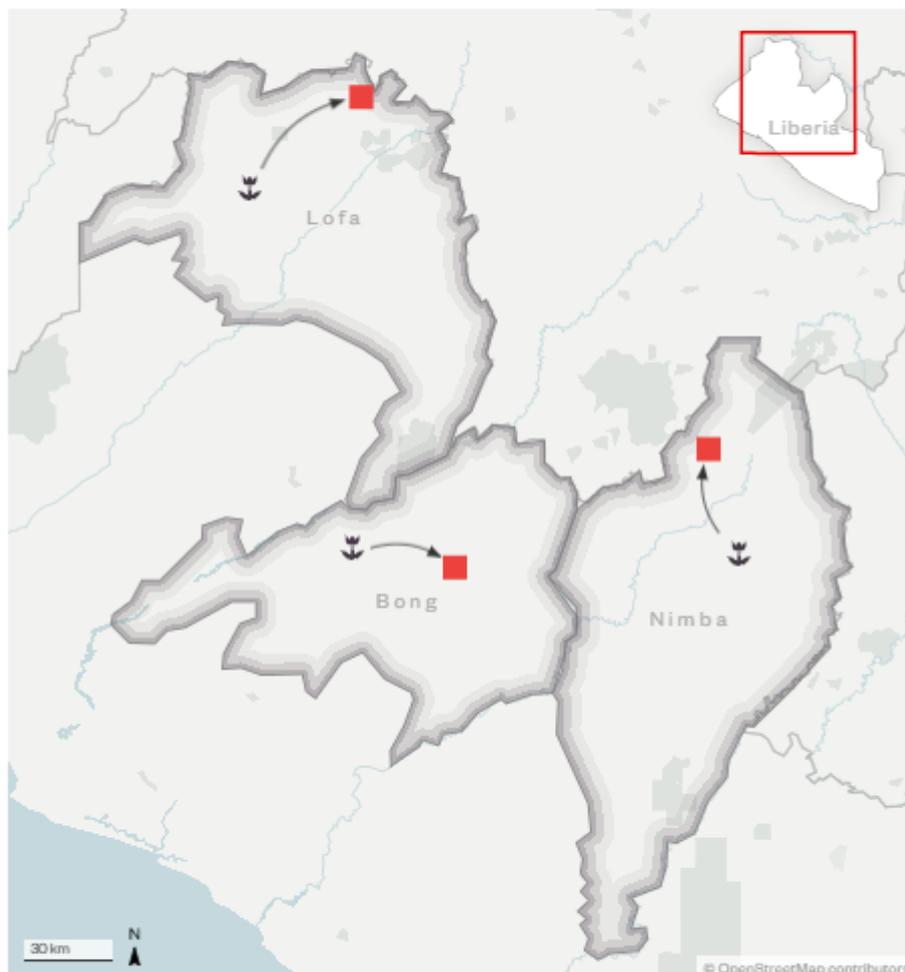
**New farms are springing up across Bong, Nimba and Lofa counties in Liberia to capitalise on the rise of cocoa prices.**  
Global Witness

## The role of “middlemen”

### 2. Cocoa farmers sell to traders in county capitals

Global Witness spoke to eight rural traders during this research, known as “middlemen” locally, across rural towns in the Liberian cocoa belt.

- **Traders** bulk buy cocoa regardless of origin, even if the cocoa is from a recently deforested farm. They told Global Witness deforestation-free cocoa is not asked for by their clients - the cocoa exporters in Monrovia. This allows deforestation tainted cocoa to flow free out of Liberia into international markets.



Click on the buttons below to see different stages of the supply chain:

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Map: Global Witness

Most Liberian cocoa farms are smallholdings, not large plantations. The average size is estimated to be around [2 ha](#) – roughly the size of 1.5 football fields.

Consequently, most farmers sell to a group of traders called “middlemen” locally, rather than spending vital earnings transporting small amounts of cocoa to Monrovia.

Several farmers also told us they sell to informal mobile traders who visit farms by motorcycle, who likely sell on to more established traders in the cities.

Managers of two larger farms also told us that they purchase directly from smaller farms, further complicating the supply chain.

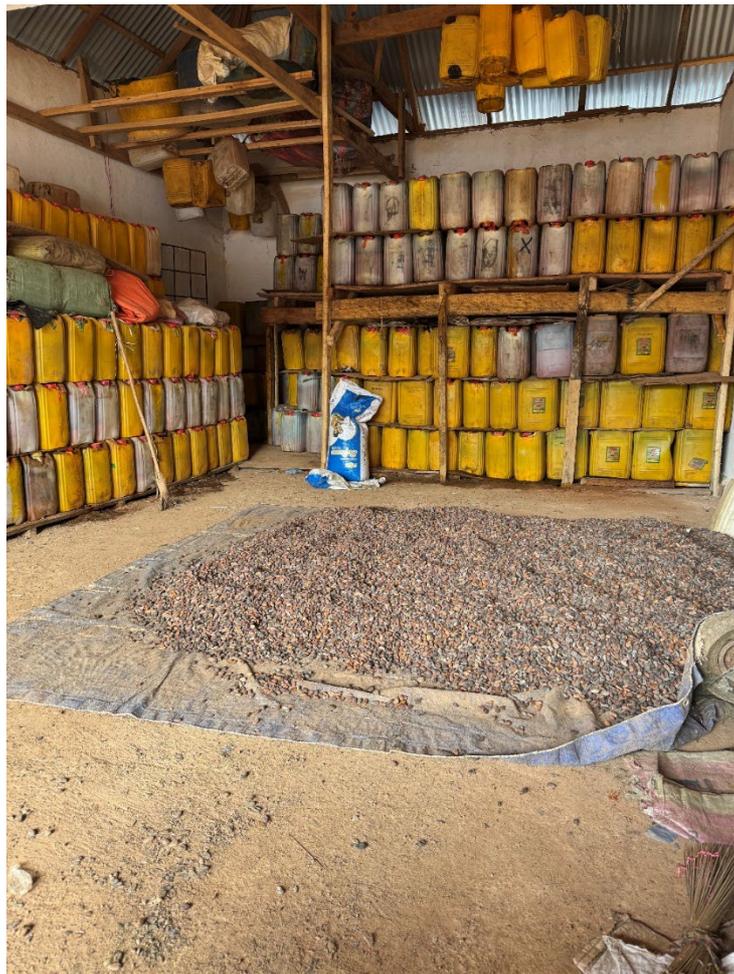


**Lofa County, which shares a border with Guinea, is the self-styled "bread basket" of the country. Global Witness**

In Bong County's capital Gbarnga, as well as in towns in Lofa and Nimba, Global Witness interviewed eight middlemen and found that they constitute an essential link in the chain.

The middlemen run small informal operations. One showed us notes of sale for his cocoa, all handwritten in notebooks.

Cocoa is left to dry on the street, as the middlemen can't afford driers. Much of the bean's quality is lost this way, and many beans are discarded.



**Cocoa dries within a warehouse in Gbarnga. Global Witness**

Several middlemen told us clearly: the international cocoa exporters they sell to in Monrovia do not ask for proof that the cocoa they provide is deforestation-free.

Without this key demand, they just keep the cocoa flowing to the country's capital, regardless of its origin.

Once a middleman has accumulated enough product to make the trip worthwhile, cocoa is loaded in a van and sold to exporters in Monrovia, ready for the long journey to Europe via sea.

## Monrovia's international cocoa sellers

In the humming port area of Monrovia, a small group of international exporters fill warehouses with Liberian cocoa purchased from middlemen to prepare them for departure to the traders, processors and grinders.

Global Witness spoke to six exporters in the capital, often while warehouse operators lugged heavy jute bags full of cocoa.

Aya Group and Granex Group are two of Liberia's largest international sellers. They told us they are beginning to map their suppliers' farms due to pressure from Europe.

Granex claims to have mapped "about 75-80%" of their supplier farms.

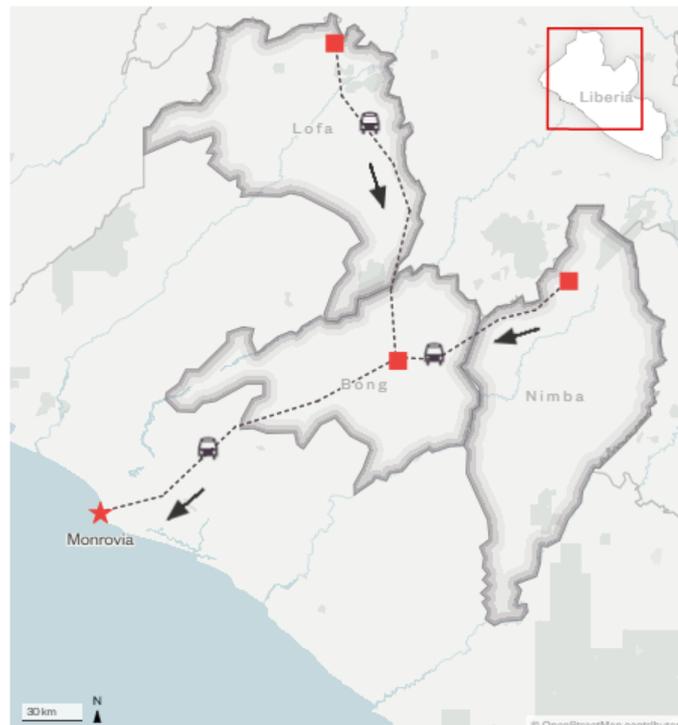
Another exporter told us that despite much of their supply heading to Malaysia, "someone from head office" was coming to start mapping farms.

The EUDR seems to be encouraging some companies to take sustainability seriously, however, this effort to map suppliers is not universal.

### 3. Traders to Exporters

Global Witness spoke to seven exporters based in Monrovia, the capital of Liberia. Many are beginning to map their supplier farms to comply with the upcoming EUDR, but say they are not receiving financial or technical support from the traders.

 All purchase from middlemen, and some buy from cocoa farms directly.



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Map: Global Witness

The manager of Trade Link, another Liberian export business, confirmed to Global Witness that it “is mapping 5,000 farms” for EUDR compliance.

He told Global Witness that Trade Link purchases from farms that have deforested in the last few years and was confused as to whether the EUDR would allow him to continue sourcing from such farms.

“We have more reserve forest,” he says, referring to Liberia’s small network of protected areas.

Global Witness investigators also saw no evidence that exporters were separating cocoa they purchased from mapped farms and cocoa purchased from middlemen.

And despite any mapping efforts, all the exporters we interviewed still source from middlemen. While they do this, there is no chance of a sustainable supply chain.

Aya Group told Global Witness that it was proud to be the first group to map over 20,000 supplier farms, and that “its supply chain is structured to minimise reliance on middlemen.”

Trade Link and Granex Group did not reply to Global Witness’ requests for comment.

## **Liberian cocoa goes global**

Supply chain data and interviews with exporters help to show where Liberian cocoa is going.

Major buyers who purchase or have purchased from the six exporters interviewed by Global Witness in recent years include Turkey’s Altinmarka and the Netherland’s ECOM, as well as major chocolate trader Cargill (although these imports appear to have ended in 2023), OFI (Olam) and Barry Callebaut.

#### 4. Liberian Exporters to European and Asian traders and processors

Global Witness found that deforestation-tainted cocoa flows from Liberia to traders and processors in Europe, including to major companies such as ECOM, Touton and Altinmarka, Cargill, Olam and Barry Callebaut. From these traders, cocoa goes on to the major chocolatiers.

 Over 20 million kilogrammes of Liberian cocoa have flowed to **Europe** since 2022, according to customs data.



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Liberian cocoa also goes to Asian processors JB Cocoa and Guan Chong Berhard.

ECOM, one of the world's largest cocoa traders, [claims on its website](#) that it is “[p]ushing the boundaries of sustainability at every opportunity.”

The company appears to be publicly distancing itself from Liberian deforestation. Between its [2023](#) and [2024](#) cocoa sustainability reports, Liberia vanished from its supplier map.

But customs data tells a different story. Shipping documents show ECOM purchased cocoa from Liberia in 2024 and up to January 2025, when the company appeared to stop sourcing from Liberia.

ECOM told Global Witness: “[C]urrently we do not have any open purchases of beans from Liberia,” although it accepted it had made purchases in 2024 and that the removal of Liberia from its 2024 Sustainability Report was done in error.

ECOM takes care to distinguish between different levels of its supply chain in its reporting. In countries such as Ghana, it sources its “origin” cocoa directly from farms through its representatives in-country. In Liberia, however, it sourced from the country’s cocoa exporters, rather than directly, until this year.

When Global Witness asked what support ECOM had given to its Liberian suppliers to achieve traceability and reduce deforestation, it told us that this information was confidential.

Campaign group Mighty Earth told Global Witness: “All actors in the cocoa supply chain have a role to play in ensuring compliance and providing support to smallholders.”

“Traders play a central role, as they have both the in-country resources and supply chain accessibility to provide financial and material support to smallholders.”

Touton, meanwhile, is a major French trader and processor that holds a unique role in Liberia, appearing to purchase in-country from other exporters such as Aya and Granex Group before shipping under its own name.

According to customs data analysed by Global Witness, it was the largest single exporter of Liberian cocoa between 2022 and 2025.

They also sell to Altinmarka and ship cocoa beans to their own European operations via a Netherlands subsidiary of an international logistics partner.

Neither Touton nor Altinmarka replied to Global Witness’ multiple requests for comment.

Cargill said it does not directly source (or otherwise purchase) cocoa of Liberian origin from Aya Group, ECOM or Touton. It added: “We can further clarify that, based on our information, we have no knowledge of prior purchases from these entities.”

Global Witness’s analysis of customs data suggests Cargill ceased purchasing directly from Liberian exporter Aya Group in 2023, after its Belgian subsidiary imported over a million kilogrammes of Liberian cocoa that year.

OFI (Olam) said its “aim is to become forest positive across our business by 2030” and “as emerging origins grow in importance, suppliers in such locations, as in other origins, must comply with our no-deforestation requirements.”

It also stated in response to Global Witness' findings: "[W]e will assess this carefully and as required, engage with our suppliers and investigate suitable mitigation actions."

Barry Callebaut said: "Sustainability is a core priority for Barry Callebaut, embedded in every aspect of our strategy and operations. We are acutely aware of the environmental and social challenges facing the cocoa sector, including deforestation, climate change, and the need for transparent, responsible supply chains.

"In the 2024/25 season, Barry Callebaut sourced approximately 0.11% of its total cocoa bean volumes from Liberia, reflecting an exceptional volatile and unprecedented market environment. This very small quantity illustrates our effort to responsibly meet customer needs during extraordinary market conditions."

Guan Chong said: "Guan Chong strives to conduct its sourcing responsibly. With regard to cocoa sourced from Liberia, volumes sourced have been modest and used exclusively in conventional product streams."

Guan Chong did not reply to Global Witness' request for further clarifications on the meaning of "conventional product streams" and whether the company could rule out selling Liberian cocoa to major chocolatiers.

JB Cocoa said: "We would like to reaffirm that all our cocoa bean supplies are sourced in line with our Code of Conduct and sustainability commitments."

Read the full responses from all companies mentioned in this report here:

[https://globalwitness.org/documents/972/Full\\_company\\_responses\\_Liberia\\_report\\_11112025.docx](https://globalwitness.org/documents/972/Full_company_responses_Liberia_report_11112025.docx)

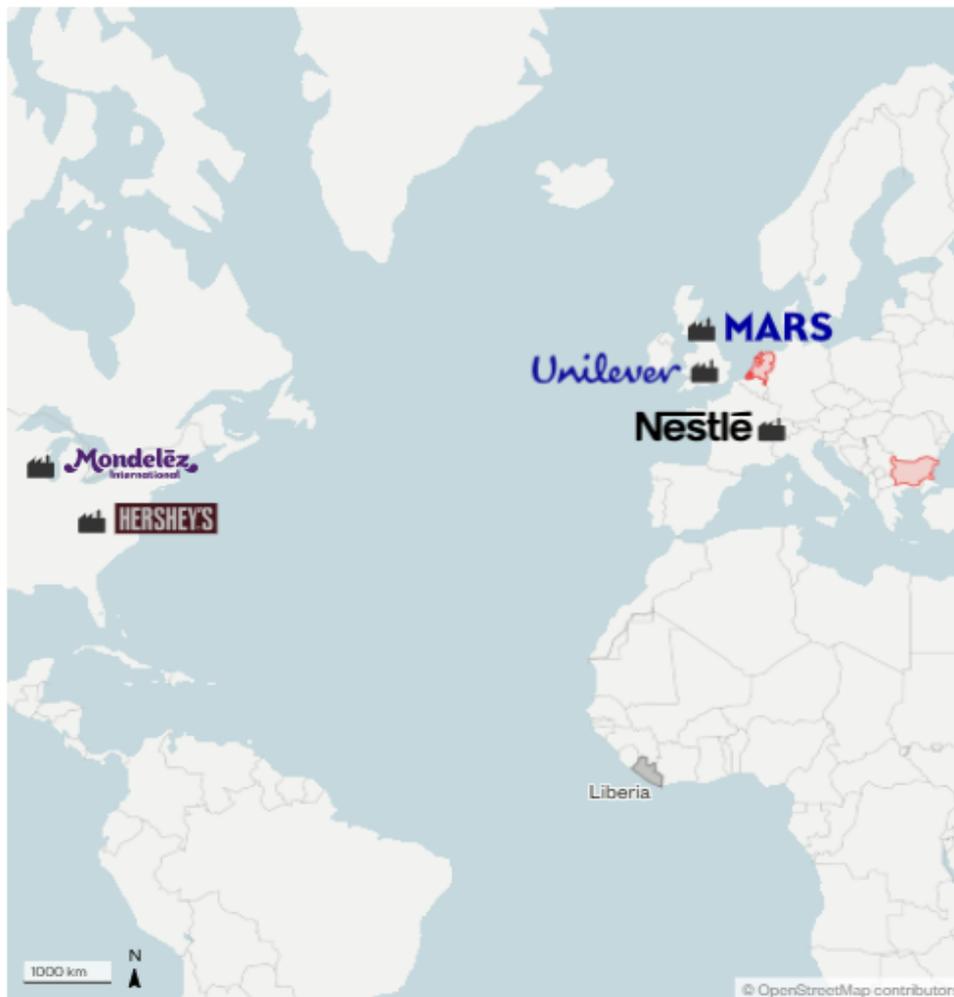
## Blended deforestation

These traders and processors are the global equivalent of Liberian middlemen – they buy as much cocoa around the world as they can to sell to firms including Nestlé, Unilever, Hershey, Mondelēz and Mars.

### 5. European Buyers to Chocolatiers

Global Witness found that Mars, Hershey, Nestlé, Mondelez and Unilever purchase from these traders in different combinations.

 The **chocolatiers'** reliance on traders and processors who mix and blend beans from various origins leaves no safeguards to stop deforestation-linked Liberian cocoa from ending up in popular consumer products.



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Map: Global Witness • Source: Images from Wikimedia Commons

### Key suppliers of popular chocolate products that source deforestation-linked Liberian cocoa

Famous brands	Company	Key suppliers
	Nestle	Theobroma/ECOM, Touton, Altinmark (Alcao Eood), JB Cocoa, Guan Chong Bhd, Barry Callebaut, Cargill, OFI
	Mars	Theobroma/ECOM, Touton, JB Cocoa, Guan Chong Bhd, Barry Callebaut, Cargill, OFI
	Unilever	Altinmarka (Alcao Eood), Barry Callebaut, Cargill
	Hershey	Theobroma/ECOM, JB Cocoa, Guan Chong Bhd, Barry Callebaut, Cargill, OFI
	Mondelez	Theobroma/ECOM, Touton, Altinmark (Alcao Eood), JB Cocoa, Guan Chong Bhd, Barry Callebaut, Cargill, OFI

Source: Global Witness, Export Genius

[Download image](#)



On condition of anonymity, an insider at a major chocolate brand spoke to Global Witness. The source told us that the role of traders is simply to meet demand, and it is common practice at chocolate majors to blend beans from different origins.

Processors blend cocoa beans from different regions – usually referred to as a “West African blend” – into “cocoa mass”, “cocoa butter” or “liquor”, which are the key ingredients of chocolate bars, often mixed according to the company’s specific recipe.

Statements from various company websites back up this source’s account of the process.

Altinmarka was the largest European buyer of cocoa from Liberia between 2022 and 2025 through its Bulgarian subsidiary, and is a key supplier to Mondelēz and Nestlé.

It publicly states: “[W]here different origin beans are required for a specific recipe, they are blended and mixed in right [sic] proportion.”

Altinmarka did not respond to Global Witness’s request for comment.



**Squares of famous Cadbury Dairy Milk. Cadbury is a subsidiary of Mondelez. Mohammed Moosa / Creative Commons / Wikimedia**

JB Cocoa also states that it “produce[s] cocoa mass by carefully blending cocoa beans from different origins” and offers a [“West African blend”](#) to consumers on their website.

[Mars](#), [Nestlé](#), [Mondelez](#) and [Hershey](#) state publicly that they rely on a “mass balance” system, which allows cocoa sourced from farms that are certified as sustainable and beans from any origin to be mixed together.

Unilever state they source mass balance in certain situations but [“have a preference for a segregated supply chain”](#).

The mass balance and blending system makes it impossible for chocolate companies buying from ECOM, Touton and Cargill, to prevent cocoa from deforested Liberian farms from entering their supply chain.

Global Witness presented the chocolatiers and suppliers with our findings.

A Mars spokesperson said: “Mars does not source cocoa from Liberia, and our suppliers are not sourcing cocoa from Liberia for cocoa sourced under the Mars Responsibly Sourced Cocoa Program.”

When Global Witness provided further evidence that showed that this statement appeared difficult to substantiate from Mars' own sustainability reporting and its use of mass balance cocoa, Mars declined to provide further information.

Unilever said that “we are confident that our exposure to cocoa from Liberia is very small to negligible.”

Nestlé said “We currently do not operate in or source directly from Liberia. However, we are aware that the risk of deforestation in Liberia is a growing concern within the broader cocoa industry.”

It also stated that “[n]early 90% of the KitKat produced in Europe carries Mixed Identity Preserved (Mixed IP) cocoa mass sourced from the cocoa farming families engaged in the Income Accelerator Program.”

When Global Witness asked for further information about how it could rule out Liberian cocoa entering its supply chain through a mass balance system, Nestlé declined to provide further information.

Hershey stated: “We take allegations of deforestation and human rights violations in our supply chain extremely seriously.

“Hershey is committed to responsible sourcing and upholding the highest standards of traceability, sustainability, and transparency across all our cocoa supply chains.

“We acknowledge the risk that cocoa grown on deforested land may enter complex supply chains, particularly where middlemen and exporters operate with limited traceability.”

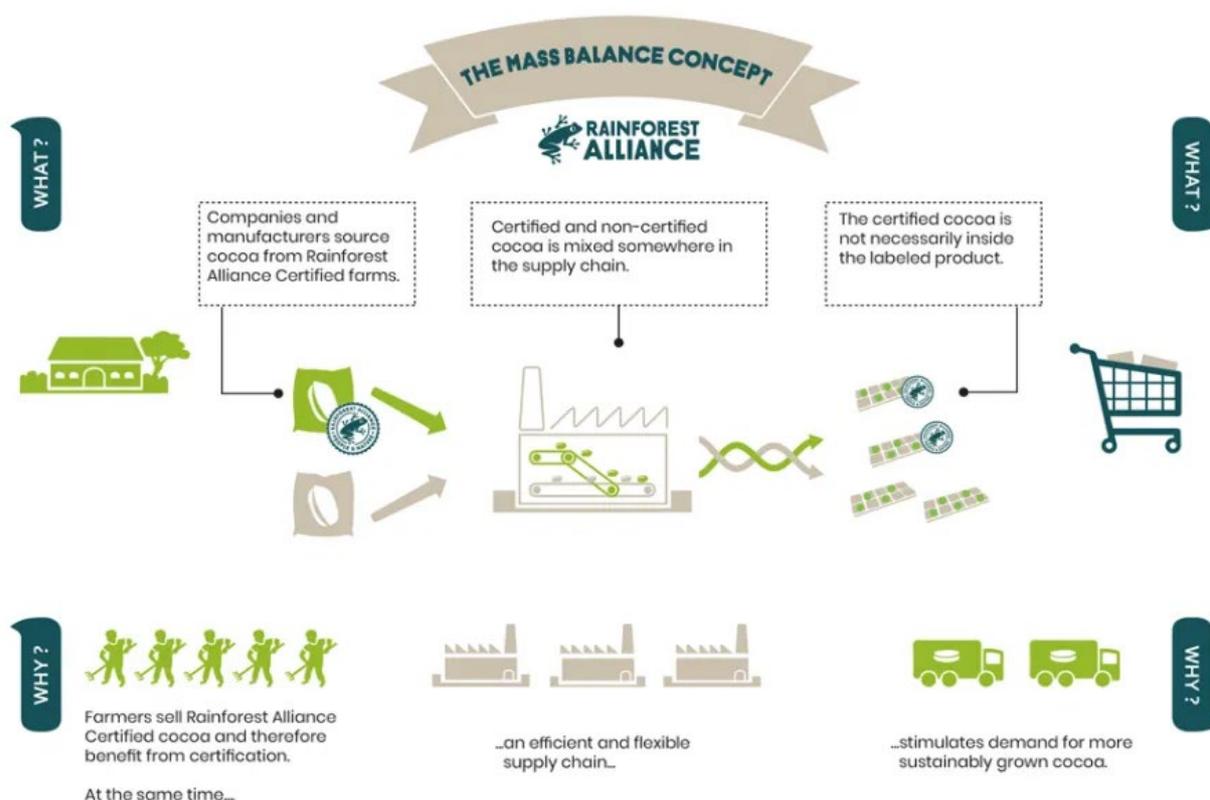
Mondelēz did not respond to multiple requests for comment.

## **Certified sustainable**

Yet despite this opaque mixed supply chain, Global Witness' research shows that every trader and chocolatier mentioned in this report is certified “sustainable”.

Traders and chocolatiers can receive a sustainability certification for their “mass balance” cocoa system under Rainforest Alliance's “Sustainable Agriculture Standard”.

The eco-label's “mass balance” version of this certification allows certified and non-certified beans to be mixed together along the supply chain – even if the non-certified beans are linked to deforestation.



In practice, this system allows traders to sell cocoa mass or liquor to companies that contain no cocoa from a Rainforest Alliance-certified farm at all.

For a chocolate bar to hold the Rainforest Alliance seal, a company only needs to source “**100% of the equivalent certified volume**” from certified farms – i.e. a company can sell 10kg of product as “mass balance” if they have purchased 10kg from certified sources, even if the product they are selling does not include any certified product.

Not a single Liberian cocoa farm has received certification under Rainforest Alliance’s scheme.

Tiago Reis, a land and food systems expert at WWF Brazil, **says**: “Mass balance systems are not effective at stopping deforestation.”

“In the cocoa sector, any companies purchasing mass balance at even reasonably large volumes are creating a market for black box cocoa,” according to cocoa expert Antonie Fountain.

Rainforest Alliance’s certification scheme is central to the organisation’s business model and cocoa certification is its **most profitable** certification scheme after coffee.

“Every certifier has a business model based on volumes sold. So, of course this will affect the robustness of their certifications. There will always be a trade-off between rigour of standards and ability to sell at volume,” adds Fountain.

Cocoa certification earned the organisation over \$18 million in 2023, the latest year financial reports were available.

Rainforest Alliance told Global Witness that it “reinvests this revenue income, including certification-related services, into our global sustainability and landscape, and communities.”

“Even if their certification label says, ‘mixed sources’, it still conveys a certain message to consumers, who may have trouble differentiating between different types of labels,” wrote [Greenpeace](#) in 2021 as part of its campaign for the EUDR.

Now the major chocolate companies are also creating their own sustainability programmes, such as Mondelez’s [Cocoa Life](#) and Nestlé’s [Cocoa Plan](#).

According to Fountain’s [Cocoa Barometer](#), these schemes are “much less transparent than Fairtrade and Rainforest Alliance, potentially leading to a race to the bottom.”

Rainforest Alliance said: “Our certification standard requires that certified cocoa does not come from deforested areas.

“We encourage cocoa companies to use a segregated sourcing model because the certified ingredients are kept separate from non-certified ingredients.

“At the same time, we recognize that mass balance sourcing makes the sale of certified cocoa easier and ultimately supports farmers who are certified.”

Many NGOs have [denounced voluntary certifications as ineffective](#) and have been calling for legal measures to ensure guaranteed zero-deforestation in supply chains instead.

## **EUDR: New zero-deforestation law under attack**

The EUDR is one law with wide backing from civil society.

A prior Global Witness analysis suggests that it could save up to [8 million hectares of forest](#) over the next decade if it enters into application on time – an area approximately the size of Austria.

The law has [rejected the mass balance approach](#) and will require major chocolate companies to prove that any cocoa or other agricultural commodity sold in the EU is not linked to deforestation post 2021.

The law – as written at the time of this investigation – says: “Mass balance chains of custody that allow for the mixing – at any step of the supply chain – of deforestation-free commodities with commodities of unknown origin or non-deforestation-free commodities are not

allowed under the Regulation, because they do not guarantee that the commodities placed on the market or exported, are deforestation-free.”

The EUDR has brought a business imperative for chocolate companies to finally tackle deforestation: access to the European market.

But the law that brought this progress is now under threat.

In 2024, the law was passed but does not yet apply to businesses importing into the EU, because its coming into force was delayed by a year under heavy pressure from businesses, including from the European Cocoa Association.

This delay means that importing commodities grown on deforested areas to the EU is not yet illegal at this time.

To the [dismay of many NGOs](#), in September 2025, the European Commission proposed delaying the law a further year, [citing IT issues](#).

Investigative NGO Earthsight says that the EU has [“once again caved to industry pressure.”](#)



**Campaigners protest outside the EU to demand the implementation of the EUDR and against rollback of the EU's environmental agenda. Philip Reynaers / Greenpeace**

Chocolate giant Mondelez – whom Global Witness has shown to be at high risk of exposure to Liberian deforestation through its purchases from ECOM, Cargill, Touton, OFI (Olam) and Barry Callebaut – has been a major voice pushing for further delays, despite the company having a [zero-deforestation commitment](#).

*Politico* reported in July 2025 that Mondelez stated that while they were prepared for the law, farmers were “far from being ready.”

In contrast, Nestlé, Mars, Ferrero and Barry Callebaut have urged the EU not to delay the law any further in a public joint letter, emphasising that they are “[deeply concerned by repeated attempts to delay, revise, or even repeal the Regulation.](#)”

Liberia is one of the [poorest countries](#) in the world. According to the World Bank, [71.6% of Liberia's rural population live in poverty.](#)

Mondelez made over [\\$11 billion in revenue from chocolate sales alone in 2024](#), more than double Liberia's GDP.

A recent [study](#) by Dutch consultancy firm Profundo assessed that the cost of EUDR compliance was a mere 0.10% of global revenues.

Global Witness asked Mondelez if it accepted that it has failed to provide sufficient financial and technical support to its indirect suppliers in Liberia to achieve traceability and eliminate deforestation, but we did not receive a reply.

But Global Witness' industry source says Mondelez is not ready because the company's own self certification programme has not sufficiently focused on traceability.

“Well if you pay them [the suppliers] they'll be ready like that,” the anonymous source said – suggesting that Mondelez could easily tackle traceability in their supply chains by offering a financial incentive.

Climate campaigners are concerned that if the EUDR is weakened or postponed again, enormous progress to tackle deforestation will be gone.

“Farmers, traders and companies have invested time and money to become compliant. The EU needs to follow through on their commitment and create a level playing field for companies importing cocoa in the EU,” said Mighty Earth.

## Local solutions

Amid threats to the EUDR, a new locally-run initiative is helping to keep Liberia's forests intact.

The new project, called Payment for Stewardship, set up by Liberian environmentalist Silas Siakor\*, aims to ensure that local communities in Liberia get paid for preserving their forest.

Silas Siakor is a longtime campaigner who [won](#) the Goldman Prize in 2006, often referred to as the “Nobel Prize for Environmentalism”.

Siakor was recognised for his work exposing how illegal timber was funding the bloody campaign of Liberian warlord Charles Taylor.

“It’s based in the community’s effort and interest to do this, as compared to outsiders telling them what to do,” Siakor says, contrasting his scheme with the much-criticised REDD+ programme of carbon credits.

“It’s actually about what people are able to do on the ground.”

The money will be paid into community funds, with \$1.50 for every hectare that communities agree to protect.

Siakor has mobilised microfinance schemes for community development as part of the agreement, but says he also understands the need for cash in villager’s pockets.

In the deeply forested Sinoe County, 500km<sup>2</sup> is already protected by the Stewardship programme – an area approximately the same size as Madrid.



**Silas Siakor (holding map, centre) working with community in rural Liberia**

Siakor is aiming for 2000km<sup>2</sup> to be protected under the programme by 2027 and says that cocoa counties Lofa and Nimba are on the list of areas he’d like to see protected by the scheme. Sadly, Bong County may already be too deforested to qualify.

He faces a significant challenge to establish the schemes’ credibility, and to prove he can succeed in protecting forests where others have failed.

Previous schemes, such as REDD+, that have aimed to monetise forest protection have faced significant criticism, with a major study in *Science* published in October showing that forest carbon credits have “[only delivered partial gains and persistent-over crediting.](#)”

Global Witness asked him what major EU companies sourcing cocoa from Liberia could do to help to save Liberia's forests.

"Cocoa has a place in the Liberian economy, and people's livelihood strategies. I would expect the companies would want to invest in identifying farmers and helping them to map their farms, so they are able to demonstrate origin of their cocoa beans," he says.

"I'm not sure why they are not stepping up to do that, but that will certainly benefit them, and it will also benefit the Liberian farmers."

Siakor pauses to reflect.

"There is potential to do cocoa at scale in a way that is environmentally helpful. Unfortunately, the companies tend to want quick profits."

## Methodology

Global Witness analysed customs data obtained from ExportGenius' platform showing all cocoa exports from Liberia that left by cargo ship in the last three years.

Global Witness used Hansen's tree cover loss data for Bong, Nimba and Lofa Counties for available years of 2021-2024 to assess how the largest cocoa-producing counties, or "cocoa belt", had lost over 250,000 ha of forest between 2021-2024.

The reader should be advised that although these are the largest cocoa-producing counties, not all deforestation in these counties is for cocoa, with small scale agriculture, mining, palm oil and rubber production also likely to be significant contributors to forest loss.

Global Witness visited 12 cocoa farms in these counties to verify cocoa-related clearance and spoke with more than 30 sources total to map the supply chain for Liberian cocoa. We infer that a significant amount of this clearance is for cocoa production, often intercropped with subsistence farming crops, such as rice or cassava.

\* Please note that Silas Siakor was previously a member of the Global Witness Advisory Council. Global Witness played no role in funding or setting up the Payment for Stewardships Scheme.

## Full company responses

### AYA GROUP

Thank you for reaching out to us regarding the concerns raised about our cocoa sourcing practices in Liberia. We appreciate the opportunity to clarify some points related to the allegations.

Firstly, it is important to note that the majority of cocoa farms in Nimba, Bong, and Lofa counties were established during the war era and have since undergone significant rehabilitation. These farms have been developed and maintained responsibly, contributing to local economies without causing further deforestation. Attached is the average ages of the farm from our database.

Regarding the allegation that recent deforestation rates for cocoa (2021-2024) indicate ongoing deforestation, we would like to emphasize that many of these farms have not yet started producing cocoa. The growth cycle for cocoa plants typically takes 4 to 5 years, meaning that newly established farms would not contribute to current production figures.

Furthermore, Aya Group is proud to be the only exporter in Liberia that has proactively mapped approximately 20,000 farms in our supply chain. We are currently tracing the origins of our cocoa to ensure transparency and sustainability in our operations. This mapping initiative positions us at the forefront of maintaining accountability and addressing any issues related to deforestation within the cocoa supply chain.

We remain committed to fostering sustainable practices and will continue our efforts to uphold the rights and health of the environment in our sourcing methods.

We would be available also in the week of November 10th to discuss these allegations further with your team.

Thank you for your understanding. We look forward to continuing the conversation and addressing any further questions you may have.

*Aya's 2<sup>nd</sup> response after Global Witness request for clarification*

Thank you for your response and for acknowledging our efforts in mapping our supply chain in Liberia.

In response to your follow-up questions:

The assertion that, 'farmers on the ground told us that first cocoa harvests typically began 18-36 months after planting, rather than the 4/5 years you suggest' cannot be true entirely. As much as there are new varieties of cocoa which can produce after 36 months (and NOT 18 - 24), those varieties are not prevalent in Liberia.

Regarding the cocoa farms identified in Annexe 2 of your letter, we source from Glarhy New Town and Saclapea, but will need to conduct further research to confirm if we source from those specific villages or towns. As for sourcing from farms planted after 2021, we maintain the growth cycle for cocoa plants typically takes 4 to 5 years, meaning that newly established farms would not contribute to current production figures. We also maintain strict policies to avoid such practices. We monitor farm registrations closely and implement a vetting process to ensure compliance with our sustainability standards.

We, as well as our partners that we sell to, utilize satellite imagery and geospatial analysis tools to monitor deforestation and assess the environmental impact of our supplier farms. To ensure data accuracy, we conduct ground truthing where feasible with on-the-ground assessments to ensure reliable conclusions about land use changes. Hence we will not have acquired certification for some of our farmers.

Regarding the allegation about sourcing cocoa beans from deforested lands through middlemen, we take this matter very seriously. Our supply chain is structured to minimize reliance on middlemen, as Aya is the only exporter with a clear established agents that we buy cocoa from. HD Produce Warehouse (Gbarnga) and Spencer and Sons Inc (Bahn) are not agents of the Aya group, even if we might have dealt with them in our earlier years. But we will investigate this claim thoroughly to gather accurate information and provide a more substantive response, during our upcoming conversation, if need be.

Concerning financial or technical support from major importers, Aya Group has received some direct assistance from them for mapping our supply chain. We have independently managed our sustainability initiatives, and we can discuss our experiences further during our meeting.

Thank you for your inquiries, and we appreciate the opportunity to clarify these points. We look forward to any further discussions.

### **BARRY CALLEBAUT**

Thank you for reaching out and for sharing your preliminary findings. We appreciate the opportunity to address your concerns and to clarify Barry Callebaut's position and ongoing sustainability efforts.

### **Barry Callebaut's Commitment to Sustainability and the EUDR**

Sustainability is a core priority for Barry Callebaut, embedded in every aspect of our strategy and operations. We are acutely aware of the environmental and social challenges facing the cocoa sector, including deforestation, climate change, and the need for transparent, responsible supply chains.

Barry Callebaut is one of the leading voices in our industry advocating for the swift and ambitious implementation of the EU Deforestation-free Regulation (EUDR). We have consistently supported this important legislation since its inception, as we firmly believe it is our shared responsibility - toward farmers, partners, and consumers alike - to halt deforestation and promote sustainable farming practices. We acknowledge the European Commission's

recent adjustments to the EUDR as constructive steps toward effective and practical implementation. Barry Callebaut has already taken the necessary measures to ensure compliance by December 30, 2025, including the mapping of more than 1.5 million cocoa farms - a milestone that underscores our commitment to transparency and accountability.

### **Liberian Cocoa Sourcing: Volumes and Traceability**

In the 2024/25 season, Barry Callebaut sourced approximately 0.11% of its total cocoa bean volumes from Liberia, reflecting an exceptional volatile and unprecedented market environment. This very small quantity illustrates our effort to responsibly meet customer needs during extraordinary market conditions.

Based on the data available, we are not aware that this cocoa is directly linked to deforestation.

We are reviewing all supplier relationships in Liberia to enhance traceability and strengthen sustainability standards in the region.

We maintain a transparent grievance mechanism through which any stakeholder may raise concerns related to sourcing, land use, or forest impact. All cases are systematically reviewed, verified, and addressed. To date, no grievances have been filed regarding Liberia.

We categorically deny any suggestion of consumer misleading or greenwashing. All our certified products comply fully with the Rainforest Alliance Sustainable Agriculture Standard, including mass-balance requirements.

Barry Callebaut has not violated any regulation and remains fully committed to meeting all current and forthcoming legal requirements, including the EUDR, as of December 30, 2025.

### **Driving Industry Transformation**

We recognize the systemic challenges in traceability and sustainability across the cocoa sector. Barry Callebaut continues to lead efforts to transform smallholder farming, promote agroforestry, and reduce emissions in line with our Net Zero Roadmap and the Paris Agreement.

### **Next Steps**

We welcome continued dialogue with Global Witness and invite you to share any further data or recommendations that could support our joint goal of improving traceability and sustainability in Liberia and beyond.

Thank you for your engagement on this critical issue.

### **CARGILL**

We can confirm that Cargill does not directly source cocoa of Liberian origin from Aya Group, ECOM, or Touton.

Cargill participates in certification programs, including those managed by the Rainforest Alliance. These programs are independently governed and follow internationally recognized standards. Where certification operates under a mass balance system, it allows certified and non-certified cocoa to be mixed while ensuring that the total volume of certified cocoa sold does not exceed the volume purchased. For additional information, we encourage you to reach out directly to Rainforest Alliance.

*Cargill 2<sup>nd</sup> response after Global Witness request for clarification*

As stated in my response on October 29, Cargill does not directly source (or otherwise purchase) cocoa of Liberian origin from Aya Group, ECOM, or Touton. We can further clarify that, based on our information, we have no knowledge of prior purchases from these entities.

**ECOM**

ECOM's Responses to specific allegations made by Global Witness in its October 23rd, 2025 report

**Allegation:** ECOM sources cocoa from the following exporters in Liberia: Aya Group, Granex Group, Cocoa Ventures, Agri Commodity Trading Company, Trade Link, AgriSource Global Limited and Premier Resources.

**ECOM response:** Currently we do not have any open purchases of beans from Liberia.

**Allegation:** These companies purchase Liberian cocoa, including cocoa grown on deforested lands, or at high risk of deforestation (see Annexe 1, 2, 3 and 4 for details on Global Witness' full methodology and findings). Through its purchasing relationship with these Liberian cocoa exporters, ECOM in sources cocoa grown on deforested lands, or at high risk of deforestation. ECOM has failed to provide Liberian exporters with sufficient financial and technical support to achieve traceability and reduce deforestation.

**ECOM response:** Your methodologies are not clear to us - we cannot therefore say whether this shows or not that any purchases made by ECOM are from any of these areas. We have been supporting our indirect supply chain in terms of carrying out social and environmental due diligence. We have also provided financing to our suppliers to carry out polygon mapping- which results were provided to us to allow us to carry out our own screening using our proprietary screening program to ensure confidence in our purchases being deforestation free. We are aware of the program being initiated by the Liberian government to improve mapping of forested area and will incorporate this into our screening program. To the extent ECOM were to make any purchases of cocoa beans from Liberia in the future, all such purchases would require screening approval via our due diligence questionnaire and confirmation that the polygons relating to the beans are verified as being deforestation free with a cutoff of 2020.

**Allegation:** ECOM sells blended or mixed cocoa products which include Liberian beans grown on deforested lands or at high risk of deforestation to Mars, Hershey, Unilever, Nestlé, Cargill, OFI, Barry Callebaut, and Mondelez.

**ECOM response:** This concerns matters which are confidential and proprietary to our clients and cannot be confirmed or denied.

**Allegation:** ECOM is trying to publicly distance itself from deforestation in Liberia by removing Liberia as a "supplier country" from its 2024 Cocoa Sustainability Report, but the company continued to source from Liberia in 2024 and 2025.

**ECOM response:** The mistaken non-inclusion of Liberia in the 2024 Cocoa sustainability report was corrected in this year's Group sustainability report which shows that we indirectly source from Liberia (<https://ecomtrading.com/media/hbsjfp42/ecom-group-sustainability-report-2024vfinal.pdf>). Liberia is also shown as a sourcing origin on our website.

**Allegation:** The company's sale of cocoa products with a Rainforest Alliance seal certified with the Rainforest Alliance Sustainable Agriculture Standard "Mass Balance" scheme constitutes greenwashing and risks misleading consumers.

**ECOM response:** ECOM complies with the rules in place with Rainforest Alliance. We communicate clearly to our clients when selling mass balance and what it means.

**ECOM 2<sup>nd</sup> response after Global Witness request for clarification**

ECOM's Responses to specific allegations made by Global Witness in its October 23rd, 2025 report

**Allegation:** ECOM sources cocoa from the following exporters in Liberia: Aya Group, Granex Group, Cocoa Ventures, Agri Commodity Trading Company, Trade Link, AgriSource Global Limited and Premier Resources.

**ECOM response:** Currently we do not have any open purchases of beans from Liberia.

**GW Forest Team new question:** 1- This appears to contradict your later statement when you say that Liberia was removed as a supplier country in your 2024 Cocoa Sustainability Report in error and your statement that you source "indirectly from Liberia".

**ECOM Response:** We sourced cocoa from Liberia in 2024 and were not deliberately trying to hide that fact but rather by error left it out of the map in our cocoa report. However, as mentioned previously we did include Liberia in our sourcing lists both on our website and in the Group sustainability report, further demonstrating that it was merely an error that they were removed from the map during the design phase of the report. We do not have open contracts with any suppliers in Liberia currently.

**GW Forest Team new question:** 2- Are you able to clarify when you last purchased from the Liberian exporters mentioned in our original letter, and what sourcing "indirectly from Liberia" means in this context?

**ECOM Response:** We do not have direct origin procurement operations in Liberia and therefore source via third party exporters.

**Allegation:** These companies purchase Liberian cocoa, including cocoa grown on deforested lands, or at high risk of deforestation (see Annexe 1, 2, 3 and 4 for details on Global Witness' full methodology and findings). Through its purchasing relationship with these Liberian cocoa exporters, ECOM in sources cocoa grown on deforested lands, or at high risk of deforestation. ECOM has failed to provide Liberian exporters with sufficient financial and technical support to achieve traceability and reduce deforestation.

**ECOM response:** Your methodologies are not clear to us - we cannot therefore say whether this shows or not that any purchases made by ECOM are from any of these areas. We have been supporting our indirect supply chain in terms of carrying out social and environmental due diligence. We have also provided financing to our suppliers to carry out polygon mapping- which results were provided to us to allow us to carry out our own screening using our proprietary screening program to ensure confidence in our purchases being deforestation free. We are aware of the program being initiated by the Liberian government to improve mapping of forested area and will incorporate this into our screening program. To the extent ECOM were to make any purchases of cocoa beans from Liberia in the future, all such purchases would require screening approval via our due diligence questionnaire and confirmation that the polygons relating to the beans are verified as being deforestation free with a cutoff of 2020.

**GW Forest Team new question:** 1- Are you able to clarify in which specific way the methodology is unclear, and what further information you may require from Global Witness in order to provide a more substantial response to our allegations?

**ECOM Response:** Your methodology focuses only on deforestation in regions where cocoa is grown but does not link to specific cocoa farms so you are not showing that this relates to our supply chains.

**GW Forest Team new question:** 2- We'd be very grateful if you could provide specific information regarding as to whether this financing has been distributed to Liberian cocoa exporters, and to which exporters (and when), as your statement stands in contrast to what we have heard directly in interviews with cocoa exporters in Liberia.

**ECOM Response:** This information is contractually between us and our suppliers and is confidential.

**Allegation:** ECOM sells blended or mixed cocoa products which include Liberian beans grown on deforested lands or at high risk of deforestation to Mars, Hershey, Unilever, Nestlé, Cargill, OFI, Barry Callebaut, and Mondelez.

**ECOM response:** This concerns matters which are confidential and proprietary to our clients and cannot be confirmed or denied.

**Allegation:** ECOM is trying to publicly distance itself from deforestation in Liberia by removing Liberia as a "supplier country" from its 2024 Cocoa Sustainability Report, but the company continued to source from Liberia in 2024 and 2025.

**ECOM response:** The mistaken non-inclusion of Liberia in the 2024 Cocoa sustainability report was due to an error in the design and corrected in this year's Group sustainability report which shows that we indirectly source from Liberia (<https://ecomtrading.com/media/hbsjfp42/ecom-group-sustainability-report-2024vfinal.pdf>). Liberia is also shown as a sourcing origin on our website.

**Allegation:** The company's sale of cocoa products with a Rainforest Alliance seal certified with the Rainforest Alliance Sustainable Agriculture Standard "Mass Balance" scheme constitutes greenwashing and risks misleading consumers.

**ECOM response:** ECOM complies with the rules in place with Rainforest Alliance. We communicate clearly to our clients when selling mass balance and what it means.

### **GUAN CHONG BHD**

Thank you for reaching out and for sharing your findings regarding cocoa sourcing in Liberia. We appreciate the opportunity to provide clarification on this important topic.

Guan Chong strives to conduct its sourcing responsibly. As your report rightly notes, achieving full traceability and eliminating deforestation risks from global supply chains poses considerable practical challenges. While we continue to make progress in these areas, we also recognize that systemic change takes time to permeate complex and often fragmented supply networks and depends on coordinated efforts across the value chain.

We participate in multi-stakeholder and industry platforms to support this process and maintain an ongoing focus on improvement, with the aim of advancing sustainability in a way that is both impactful and socially responsible.

With regard to cocoa sourced from Liberia, volumes sourced have been modest and used exclusively in conventional product streams. These have not been included in certified product lines. Due to current limitations in traceability infrastructure and availability of detailed geolocation data, we are unable to independently verify specific allegations regarding the cocoa's provenance.

We apply certification schemes such as the Rainforest Alliance's Mass Balance while remaining transparent about their scope and limitations.

We appreciate your engagement and welcome continued dialogue to support shared sustainability goals.

Thank you.

### **HERSHEYS**

Thank you for your letter dated October 23, 2025, and for the opportunity to comment on your forthcoming report regarding deforestation for cocoa in Liberia and its potential links to Hershey's supply chain.

We take allegations of deforestation and human rights violations in our supply chain extremely seriously. Hershey is committed to responsible sourcing and upholding the highest standards of traceability, sustainability, and transparency across all our cocoa supply chains.

### 1. **Supplier relationships and sourcing models**

- Hershey sources cocoa from a range of suppliers. We require all suppliers to comply with our Responsible Sourcing Policies, including commitments to No Deforestation.
- We recognize that mass balance models, while industry standard, present traceability challenges. Hershey is actively working to increase direct traceability to farm level and supports sector wide efforts to improve supply chain transparency.

### 2. **Risk of deforestation linked Cocoa**

- We acknowledge the risk that cocoa grown on deforested land may enter complex supply chains, particularly where middlemen and exporters operate with limited traceability. Hershey is investing in mapping and monitoring tools, supplier engagement, and third-party audits to mitigate these risks.
- We are aware of the findings in your annexes and appreciate the detailed methodology. We are reviewing the specific supply chain links and have started engaging with our suppliers to verify and address any identified risks.

### 3. **Next Steps**

- We will review the specific allegations and supply chain links identified in your report and engage with our suppliers to verify compliance and address any gaps.
- We welcome further dialogue and are open to arranging an interview with our sustainability team at a mutually convenient time.
- If any of the statements in your letter are inaccurate, we will provide clarifications following our internal review.

Thank you again for the opportunity to comment. We are committed to continuous improvement and constructive engagement with all stakeholders to advance responsible sourcing and protect forests and communities.

### **JB COCOA**

Thank you for reaching out and sorry for the slight delay in our response.

We would like to reaffirm that all our cocoa bean supplies are sourced in line with our Code of Conduct and sustainability commitments. Our suppliers are required to comply with these standards, which clearly prohibit sourcing cocoa beans from deforested areas.

We remain committed to responsible and sustainable cocoa production, and we continue to work closely with our partners to ensure full compliance and transparency across our supply chain.

### **MARS**

Mars cares deeply about the challenges facing the global cocoa supply chain. We understand that forests and other natural ecosystems are essential for a healthy environment and productive supply chains. Mars does not source cocoa from Liberia, and our suppliers are not sourcing cocoa from Liberia for cocoa sourced under the Mars Responsibly Sourced Cocoa Program.

At Mars, we make our social, environmental and ethical expectations clear for our suppliers in our Supplier Code of Conduct, which includes expectations on deforestation. Mars' long-term vision is to expand our influence beyond just the supply that we use, so that our suppliers prevent deforestation and land conversion throughout their full business.

In addition, we require all cocoa sourced by our suppliers under the Responsibly Sourced Cocoa Program to be, among other things:

**Third-Party Verified:** Independent third-party auditors review the cocoa supply chains of the suppliers and their farming organizations participating in the Responsibly Sourced Cocoa Program to determine whether they meet the certification standards of Rainforest Alliance, Fairtrade or another certification body approved by Mars or comply with the Responsibly Sourced Cocoa Specification.

Deforestation and conversion-free (as defined by the Accountability Framework Initiative (AFI) ) after 31 December 2013 or the date specified in a credible landscape-level framework, such as the Cocoa & Forests Initiative (CFI) which defines 31 December 2017 as the cutoff date and produced on farms whose perimeters have been polygon-mapped using GPS coordinates.

### **NESTLÉ**

We appreciate your interest in Nestlé's cocoa sourcing practices. We aim to provide transparency in our operations, and we would like to share key aspects of our approach.

Nestlé's approach to responsibly sourced cocoa is rooted in our Nestlé Cocoa Plan (NCP) which has been in effect since 2009. Our Nestlé Cocoa Plan (NCP) is implemented in 11 countries, including Côte d'Ivoire, Ghana, Cameroon, and Nigeria. We currently do not operate in or source directly from Liberia. However, we are aware that the risk of deforestation in Liberia is a growing concern within the broader cocoa industry.

To date, the NCP has engaged more than 180,000 cocoa-farming families, building on our three pillars:

- Better farming, aiming to improve livelihoods in communities.
- Better lives, aiming to help cocoa families to enhance their social conditions.

- Better cocoa, aiming to improve product cocoa traceability. Our journey towards building a more transparent and traceable supply chain includes delivering different traceability levels, from Mass Balance to Mix Identity Preserved through certification, and promoting agroforestry.

In 2024, 88.9% of our cocoa was sourced through the NCP with our ambition to reach 100% by 2025. The use of the Rainforest Alliance as our sole certifier allows us to ensure that farms and factories comply with various traceability schemes, including Mass Balance, Segregated, and Mix Identity Preserved.

For products sold in Europe, the NCP ensures traceability by applying the Rainforest Alliance (RA) Mass Balance certification at the factory level.

We are also going beyond just the RA Mass Balance traceability mechanism. All the beans that we source directly are delivered under segregated traceability and the cocoa mass (or liquor) coming from the Income Accelerator Program is also delivered under segregated traceability.

Nearly 90% of the KitKat produced in Europe carries Mixed Identity Preserved (Mixed IP) cocoa mass sourced from the cocoa farming families engaged in the Income Accelerator Program. Mixed IP is a type of traceability system where certified products from different certified farms or sources are mixed, but still kept physically separate from all non-certified products. This allows the product to be traced back to the specific certified farms or organizations that contributed to the final product. It also guarantees that these products come from the same program, in this case the Nestlé Income Accelerator Program, housed under the NCP.

We are also active in forest protection and restoration initiatives. In July 2020, we entered in a partnership with the Earthworm Foundation, the Ivorian Ministry of Water and Forests (MINEF), and the Ivorian Forest Development Agency (SODEFOR) to help protect and restore the Cavally Forest Reserve and enhance the resilience of local communities through a 3-year funded project. Today, we are pleased to see that the status of the Cavally Natural Reserve forest has changed from a Classified Forest to a Natural Forest Reserve, which leads to a higher level of protection, a main objective of this initiative.

We believe that collective action among a multitude of stakeholders is essential for impactfully addressing these challenges. That is why we are encouraged to see new government and industry partners join the project. This list includes the Ivorian Ministry of the Environment, Sustainable Development, and Ecological Transition (MINEDDTE), the Office Ivoirien des Parcs et Réserves (OIPR) for the Cavally Forest management, the Swiss government (SECO), amongst other industry partners.

Collaboration with our suppliers is also vital to achieve our desired level of transparency across our supply chain. We are encouraging all our suppliers to deliver Mixed IP beans to their facilities, which will then be processed into the ingredients we procure for manufacturing our products.

We began our transparency journey and our sustainability efforts decades ago and it has accelerated since 2022 with the first Mix Identity Preserved flows. We aim to continue accelerating the transition to Mix IP beans in the coming years.

We hope this information clarifies our commitment to responsible cocoa sourcing and traceability. Should you have any further questions or require additional details, please do not hesitate to reach out.

### **OFI**

At ofi, our aim is to become forest positive across our business by 2030. Our overarching company sustainability strategy, Choices for Change, focuses on key environmental and social sustainability issues, with public commitments to track our progress.

Our forest positive targets for 2030 are that:

- all ofi direct supply chains are deforestation-free,
- there is negligible risk of deforestation in indirect supply chains, and
- tree carbon stock increases across ten ofi strategic landscapes.

For our cocoa business, we also have a dedicated product strategy, Cocoa Compass which outlines how we address challenges in our direct cocoa supply chain, with targets aligned to Choices for for Change.

We require that our suppliers, whether direct or indirect, sign the ofi Agri Supplier Code which sets out our expectation that raw materials and products supplied to ofi are produced in a manner that is socially responsible, economically profitable, and environmentally sustainable. By signing, suppliers agree to specific terms in the Code, such as not sourcing or delivering products to ofi resulting from the destruction of important natural habitats including forests, and adopting suitable practices to protect species, their habitats, and important sites on and around farms.

As part of our efforts to become forest positive, we aim to map our entire direct cocoa supply chain back to the farm, and we are rapidly approaching completion of this extremely challenging activity. This allows us not only to identify farmers who don't comply with our policy but also provides insights on farming practices and farmer needs to design sustainability programs. Our programs focus on actions to end unsustainable practices including deforestation, to protect human rights and the rights of children in poor rural areas, and to improve farmer livelihoods.

By definition it is more challenging to assess and mitigate risk in our indirect supply chains, which is one of the reasons we have grown the proportion of our business that is traceable and sustainable. In our indirect supply chains, we draw on our legacy of origination to build long-term relationships with suppliers based on responsible business practices and trust and

participate in major sectoral initiatives such as the Cocoa and Forests Initiative, where governments (e.g. Ghana, Cote d'Ivoire) have taken the lead on national traceability systems.

Beyond our certified and verified sustainable supply chains (including AtSource), we are also in the process of rolling out our Agri Supplier Code verification program in our indirect supply chain aiming to cover all of Cocoa origins and prioritising high-risk areas. As emerging origins grow in importance, suppliers in such locations, as in other origins, must comply with our no-deforestation requirements.

We welcome Global Witness' report highlighting the alleged risks in Liberia. As with any such report we will assess this carefully and as required, engage with our suppliers and investigate suitable mitigation actions.

## **RAINFOREST ALLIANCE**

### **COCOA FROM LIBERIA**

At the moment, Rainforest Alliance does not certify any cocoa farms in Liberia. In recent years, we have had only two certificate holders (CH) in Liberia holding a certification license from the Rainforest Alliance; however, neither of those farms has conducted any sales of cocoa as Rainforest Alliance Certified. In the meantime, their licenses have expired.

None of the farms noted in your research is currently certified by the Rainforest Alliance.

Please note that the Rainforest Alliance Sustainable Agricultural Standard includes strong measures against deforestation - certified farms must not have any deforestation from 2014 onward, which means that the deforestation cut-off date in our standard goes even further than that currently required by EUDR.

### **RAINFOREST ALLIANCE ORGANIZATIONAL STRUCTURE AND MISSION**

As an international non-profit organization that works to restore the balance between people and nature for both to thrive in harmony, we use "participation royalties" paid by companies which buy and/or sell crops produced on Rainforest Alliance Certified farms, to develop certification standards and policies, train farmers and auditors, manage quality control systems, and support sustainability and landscapes and communities programs. Revenue generated through participation royalties is not profit but rather funding that fuels the scale and effectiveness of the full breadth and depth of our work.

If you would like to know more about how we are funded, please refer to our annual reports and other financial documents, which are always available on our public-facing website.

[Annual Reports Archive](#) | [Rainforest Alliance Audited Financial Documents](#) | [Rainforest Alliance](#)

### **SOURCING MODELS**

Please note that we encourage cocoa companies to use a segregated sourcing model because the certified ingredients are kept separate from non-certified ingredients.

At the same time, we recognize that mass balance sourcing makes the sale of certified cocoa easier and ultimately supports farmers who are certified. Supply chain actors choose what sourcing model to use, not the farmers. However, without a mass balance sourcing model, many smallholder farmers producing certified crops would be left out. Our approach prioritizes the interests of the smallholder farmer as this is how we deliver towards our mission.

#### **RESPONSES TO YOUR QUESTIONS**

**1) Rainforest Alliance has certified the supply chains of the below cocoa traders and processors under the Sustainable Agriculture Standard: ECOM, Touton, Alcao Eood, Cargill, Olam, Barry Callebaut, Guan Chong Bhd, and JB Cocoa.**

We do not certify supply chains. We certify farms, farm groups, and supply chain actors. We have certificates for the following entities. Please note that none of these certificates are for sites in Liberia.

1. ECOM-many RA Certified entities
2. Touton many RA Certified entities
3. Alcao Eood - RA Certified
4. Cargill many RA Certified entities
5. Olam many RA Certified entities
6. Barry Callebaut - many RA Certified entities
7. Guan Chong Bhd - RA Certified
8. JB Cocoa - multiple RA Certified entities

**2) Rainforest Alliance has certified the supply chains of these companies despite these companies purchasing Liberian cocoa, including cocoa grown on deforested lands, or at high risk of deforestation (see Annexe 1, 2, 3 and 4 for details on Global Witness' full methodology and findings).**

The Rainforest Alliance assurance mechanism is limited to a company's activities, as they relate to certified cocoa - not the entire scope, operations or full supply chain of a company. Put differently, our certification standard requires that certified cocoa does not come from deforested areas.

**3) Rainforest Alliance's certifying of these companies as sustainable constitutes greenwashing and risks misleading consumers.**

Please note the answers above, which describe our approach, processes and assurance mechanisms, as well as our legal status as a non-profit organization.

#### 4) The \$18.3 million of income Rainforest Alliance made from the cocoa industry in 2023 compromises the robustness of its certification schemes.

The allegation that the Rainforest Alliance's \$18.3 million in income from the cocoa sector in 2023 is not accurate and is a gross misrepresentation of how our organization operates. Our revenue is not profit, it fuels the scale and effectiveness of our work across more than 60 countries. As a mission-driven nonprofit, the Rainforest Alliance reinvests this revenue income, including certification-related services, into our global sustainability and landscape, and communities' programs. This includes investments in field-level training for farmers, improvements to our traceability systems, and support to rural cocoa and forest communities to build partnerships with companies, governments, and local NGOs to tackle complex and interconnected challenges like climate change, deforestation, human rights violations, and rural poverty.

#### *2<sup>nd</sup> response after Global Witness request for clarification*

To be clear, participation royalties are not defined as revenue, as the Rainforest Alliance is a not-for-profit organization. (Please note you can find the detailed description of how we are funded on our public website, which can be found [here](#).) As stated on our website, companies pay royalties for their use of the Rainforest Alliance Certified seal on certified products. All of these royalties are used to fund programs - specifically for developing standards, training farmers, data management, technical systems, and field staff in-country, etc. Therefore, your use of the term "revenue" is not an accurate representation; participation royalties go towards impact and are thus not considered profit.

A supply chain can consist of several elements, such as suppliers, manufacturers, distributors, retailers and customers. The supply chain actors that Rainforest Alliance certifies generally include the farms that produce the crops and the retailers that handle certified products and use the Rainforest Alliance seal.

We have two types of tailored certifications, one with requirements to farms and one with requirements for supply chains. Please go here for full information: [We're Launching Version 1.4 of our Sustainable Agriculture Standard - Here's What's Changing](#)

#### **UNILEVER/THE MAGNUM ICE CREAM COMPANY**

Thank you for the opportunity to respond. We have asked our suppliers, both global key suppliers and regional suppliers, and can confirm that exposure to cocoa coming from Liberia is very small to negligible.

At The Magnum Ice Cream Company (TMICC), we take responsible sourcing seriously and are committed to transparency and continuous improvement across our supply chains. We have reviewed the statements provided and offer the following clarifications.

Cocoa is a key commodity for our business, and we have continued to source it in line with Unilever's Responsible Sourcing Policy and People and Nature Policy, which is independently audited. The vast majority of our cocoa is coming from the Ivory Coast and we source >95%

Rainforest Alliance or Fairtrade certified cocoa. Certification ensures we meet agreed sustainability standards with our suppliers in the countries we operate in. Rainforest Alliance has confirmed there are currently no certified cocoa farms in Liberia, and origin matching rules prevent certified credits from covering conventional Liberian beans.

Based on this, and confirmation from our suppliers, we are confident that our exposure to cocoa from Liberia is very small to negligible.