

Mr. Rubens Carvalho
Deputy Director
EARTHSIGHT
The Green House – Unit 3.6
244-254 Cambridge Heath Rd
London, E2 9DA

August 20th, 2024

Ref.: Response to Earthsight's Allegations Regarding Grupo Horita and Grupo Franciosi Agro - RTRS certified

We are writing in response to your letter dated August 14, 2024, which we received via email on the same day. In your correspondence, Earthsight raises serious allegations against Grupo Horita and Grupo Franciosi Agro, claiming connections to land grabbing, deforestation, corruption, and violations of traditional communities' rights. These two producers have a Round Table on Responsible Soy ("RTRS") certification.

We categorically reject the assertion that RTRS has any ties—direct or indirect—with Brazilian soy linked to these unethical practices. These allegations (made in general terms by Earthsight) are not only unfounded but also misrepresent the operational and ethical framework within which RTRS functions. We are committed to upholding the highest standards of responsibility in soy sustainability and have strict protocols in place to address any grievances, while following a continuous improvement criterion.

It is essential, and indeed a responsibility of Earthsight, to ensure that any claims of wrongdoing and criminal activity mentioned in the Letter, of which Earthsight seems they have become aware, are reported to the appropriate public authorities in Brazil for further investigation and action.

Despite the numerous findings and factual statements regarding wrongdoing and criminal activities presented in Earthsight's Letter, it is important to note that RTRS has not been given sufficient clarity or precise details to effectively verify, contrast, or thoroughly assess and respond to the validity of such findings.

Notwithstanding the above, we appreciate the opportunity to clarify the role and responsibilities of RTRS in the certification process, as misinterpretations regarding our procedures have arisen from your Letter. In this regard, it is crucial to understand that **RTRS is an established certification scheme owner**. This role entails the development and enforcement of rigorous standards and accreditation and certification auditing procedures designed to promote sustainable soy production practices within the soy supply chain and within the scope of the certification required by the producer.

RTRS' standards and processes are developed and revised involving a multi-stakeholder approach, incorporating public consultations, a dedicated working group, and multiple stages of approval. Detailed information about this procedure is publicly available on our website.

Attached as an annex to this email, alongside this letter, is the document titled "*Important Clarification about RTRS Certification Standards.*" This document provides a detailed summary of our certification process, which is also clearly outlined on the [RTRS website](#).

Additionally, RTRS has formally requested its certification bodies to carry out a thorough and substantive due diligence analysis and to provide an updated, comprehensive report assessing whether the producers have complied with RTRS Standards.

As a result of this request, the grievance mechanism has been activated, leading to the suspension of the certificates for both Grupo Horita and Cerquality Consultoria em Sustentabilidade e Certificação Ltda - Grupo IV (which includes Grupo Franciosi Agro). This suspension will remain in place until a detailed investigation verifies the compliance of the referred producers with our established standards, thereby promoting transparency and integrity within the certification process. A comprehensive analysis focused on the specified producers and associated entities is currently underway, examining their operations at Fazenda Centúria, Fazenda Timbaúba, and Fazenda Sagarana under Grupo Horita, as well as Fazenda Santana and Fazenda Santo Antônio, which are part of the group certification for Cerquality Consultoria em Sustentabilidade e Certificação Ltda - Grupo IV.

When a grievance is raised against a certified producer, the certification body is mandated to conduct an assessment of the situation. The initial step involves suspending the certificates of the concerned producer groups while findings are being evaluated, as mentioned in the Letter. Depending on the results of this initial assessment, a further in-depth analysis and an additional audit may be warranted. If the certification body ascertains compliance with the RTRS Standard for Responsible Soy Production V4.0—which necessitates documented evidence demonstrating adherence to various criteria and all standards—the certification will remain valid. Conversely, if the investigation uncovers non-compliance, the certification will be revoked for the specific farms or producers involved. Additional sanctions may also be imposed on the producers. Please review the [system of sanctions from the RTRS Website](#).

This analysis is part of the RTRS requirements and includes re-evaluating documents such as property titles, lease contracts, and satellite images to verify deforestation. They also cross-check official databases, including the Dirty List of Slave Labor from Brazil's Ministry of Labor and Employment, environmental embargoes from IBAMA, labor debt verification from the Labor Inspection Secretariat, and court databases from Bahia state to assess existing claims, among others. Additionally, the certification bodies are reviewing all evidence collected during audits, including stakeholder interviews.

RTRS does not directly issue certificates, nor is responsible for it. This procedure is explicitly outlined in our "*RTRS Accreditation and Certification Standard for Responsible Soy Production V4.3.*" According to Indicator 3.5.1, "*RTRS does not issue certificates itself. Independent certification bodies carry out the audits that lead to RTRS certification.*" These certification bodies are accredited by approved accreditation organizations. The RTRS Secretariat oversees the correct implementation of the assurance system to ensure adherence to our established standards.

The audit and certification decisions are conducted exclusively by these independent and accredited third-party certification bodies, which are approved by RTRS. This process ensures

compliance with all relevant standards and procedures. Certified producers are subject to annual audits, even though the certificate is valid for five years, to maintain their certified status continually.

In light of these considerations and the limited time available for a thorough evaluation of the findings used against RTRS in the Letter, we: (i) strongly urge Earthsight to refrain from making any public statements that could undermine the credibility of the audits conducted, the RTRS standard, or the compliance of its members with the relevant principles, indicators, and criteria; and (ii) explicitly reserve the right to seek any available remedies to address damages resulting from any unfounded statements that may harm RTRS, its members, or their reputations.

Finally, we encourage you to visit the [RTRS' Website](#) for responses to all your queries.

We hope this clarification enhances your understanding of RTRS's role in the certification process and underscores our commitment to responsible and ethical practices within the soy supply chain.

Sincerely,



Luiza Bruscato

RTRS Executive Director

<https://responsiblesoy.org/?lang=en>