

# THE EU'S FOREST FOOTPRINT

POLICY TO DRIVE CORPORATE ACTION

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## Important Notice

CDP is a global non-profit that runs the world's environmental disclosure system for companies, cities, states and regions. Founded in 2000 and working with over 590 investors with \$110 trillion in assets, CDP pioneered using capital markets and corporate procurement to motivate companies to disclose their environmental impacts, and to reduce greenhouse gas emissions, safeguard water resources and protect forests. Over 10,000 organizations around the world disclosed data through CDP in 2020, including more than 9,600 companies worth over 50% of global market capitalization, and over 940 cities, states and regions, representing a combined population of over 2.6 billion. Fully TCFD aligned, CDP holds the largest environmental database in the world, and CDP scores are widely used to drive investment and procurement decisions towards a zero carbon, sustainable and resilient economy. CDP is a founding member of the Science Based Targets initiative, We Mean Business Coalition, The Investor Agenda and the Net Zero Asset Managers initiative. Visit [cdp.net](https://cdp.net) or follow us @CDP and on LinkedIn to find out more.

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# FOREWORD

**There is growing recognition among European policymakers, capital markets, and civil society that regulatory action is urgently needed in the European Union to ensure that the corporate sector reduces its impact on deforestation and forest degradation. The expansion of agricultural commodities continues to be the largest driver of deforestation and Europe's tropical forest footprint has serious implications, not only for the climate but also for biodiversity. This is linked to a growth in global demand for commodities such as palm oil, beef, and soy, whereas forest degradation is linked more to the production of timber and non-timber forest products.**

On average, annual tropical tree cover loss between 2014 and 2018 emitted 4.7 gigatons of carbon dioxide per year — more than all the EU's 2017 greenhouse gas emissions<sup>1</sup>. The EU accounts for 7 to 10% of the global consumption of forest risk commodities (FRC)<sup>2</sup>.

Ensuring that EU consumption is deforestation-free is supportive of the European Green Deal, the Paris Agreement on climate change, the Convention for Biological Diversity, and the 2030 Agenda for Sustainable Development (particularly SDG 15). The objective of this report is to derive insights from CDP data on corporate action on tropical commodity-driven deforestation and forest degradation, whereby a more comprehensive EU policy approach to FRCs could be developed that also considers the actual drivers of corporate behavior.



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# ABOUT THIS BRIEFING

**CDP is in a unique position to contribute private sector data and insights into the European policy discussion on reducing deforestation in agricultural commodity supply chains. In 2020, CDP collected data from 687 global companies in supply chains of FRCs on behalf of over 515 investors, with assets of US\$106 trillion, and 19 purchasing companies. The data derived from these companies can provide an insightful overview of how the market is responding to the challenges posed by deforestation and its regulatory environment, assessing the constraints faced by companies that hinder their journey of reducing deforestation in their supply chains.**

# OVERVIEW OF THE EU MEASURES AGAINST DEFORESTATION AND THEIR IMPLICATIONS FOR THE CORPORATE SECTOR

Recent years have witnessed a strong momentum within the European public institutions around the issue of deforestation and related environmental and social impacts. A key turning point has been the release by the EU Commission of the Communication on stepping up action to protect and restore the world's forests, where one of the crucial objectives is to reduce the footprint of EU consumption on global land. To achieve this, the EU studied potential due diligence criteria and the Environment, Public Health and Food Safety (ENVI) Committee of the European Parliament developed a first proposal for an EU legal framework to halt and reverse EU-driven global deforestation. This section will provide an overview of the fundamental EU measures against deforestation.

## EU Commission's Communication on stepping up action to protect and restore world forests

This Communication, released on 23 July 2019, has been widely welcomed as a potential game changer<sup>3</sup> opening the door for a comprehensive new law to protect global forests. The implementation of the priorities would call all economic actors to enhance their action to phase out deforestation from their direct and indirect operations. The main calls are to (1) improve corporate and financial reporting on the impact on deforestation and forests degradation as a foundation for meaningful action and accountability; (2) phase out deforestation from supply chains; (3) develop business strategies inclusive of a forest-risk assessment; and (4) support the shift to green finance for sustainable businesses.

The term 'forest risk commodity' (FRC) is used in this report to refer to those commodities that are most commonly related to deforestation and forest degradation.

## Study on due diligence requirements through the supply chain

The European Commission's due diligence study<sup>4</sup>, published February 2020, focuses on the requirements to identify, prevent, mitigate and account for environmental and climate damage, human rights violations and other issues. It explores regulatory frameworks and market practices, examining options for corporate due diligence in supply chains. Three key findings emerge from this research:

1. While the UN Guiding Principles on Business and Human Rights' standard of due diligence is increasingly used in legal standards or proposed in Member States, only 1/3 of EU businesses currently undertake some form of due diligence that takes into account all human rights and environmental impacts<sup>5</sup>.
2. The current EU voluntary measures have failed to meaningfully change the way businesses manage social, environmental, and governance issues.
3. A cross-sectoral approach for an EU-level regulation on due diligence is favoured, which will help to ensure a level playing field for businesses throughout FRC supply chains while also enabling policy harmonization and legal certainty<sup>6</sup>.

## EU legal framework to halt and reverse EU-driven global deforestation

The latest Environment, Public Health and Food Safety (ENVI) Committee of the European Parliament report<sup>7</sup> from October 7th, 2020, requests the Commission to table a legislative proposal to require all FRCs placed on the EU market to be produced in accordance with sustainable production, deforestation-free criteria, and protecting indigenous communities' human rights<sup>8</sup>. This resolution for a new EU legal framework calls for mandatory due diligence, corporate reporting, disclosure, and third-party participation requirements. By introducing due diligence legislation on FRCs, the EU could speed up business transitions to deforestation-free supply chains. The Commission is now required to present an EU legal framework to halt and reverse EU-driven global deforestation by the summer of 2021.

The European Parliament report by MEP Delara Burkhardt shows an unprecedented level of ambition. The list of forest and ecosystems risk commodities is comprehensive and covers those most responsible for imported deforestation in the EU. Importantly, the EU legal framework would extend beyond forests to include high-carbon stock and biodiversity-rich ecosystems, such as wetlands, peatlands, and savannas, as well as marine and coastal ecosystems.

The report cites research indicating minimal extra costs incurred by operators affected by this new law, essentially "leveling the playing field" by holding companies to the same standards<sup>9</sup>. This is important and will need to be a primary consideration when drafting the due diligence legislation; otherwise, it will create an unfair cost burden on smaller economic players expected to fulfill the legal requirements.

## 2030 Biodiversity Strategy

The EU Biodiversity Strategy for 2030, launched in May 2020, outlines the EU's plans to set biodiversity on the long path to recovery over the next decade. In its approach to business and biodiversity, the Commission identifies the need to develop a sustainable corporate governance initiative; this is underpinned for the future development of regulations on environmental duty of care and due diligence across economic value chains. It also aims to strengthen current business and biodiversity platforms, with particular attention to "measures to incentivise and eliminate barriers for the take-up of nature-based solutions". It plans to foster the integration of biodiversity in business decision-making by promoting initiatives to measure the environmental footprints through life-cycle approaches and natural capital accounting.

Despite highlighting the business case for biodiversity and the role of business action in protecting it, the private sector receives limited attention in the strategy. The strategy mentions the private sector as a potential source of investment for tackling biodiversity loss, but does not include possible financial incentives for companies to consider the impacts of their operations and supply chains on biodiversity.

## Nature-based Solutions (NbS)

NbS is an umbrella term to describe a wide array of ecosystem-based options to protect, sustainably manage and restore natural or modified ecosystems, which address challenges, such as climate change, effectively and adaptively, while simultaneously providing human well-being and biodiversity benefits. NbS are being increasingly adopted in actions aimed at managing, protecting, and restoring forest ecosystems, which has prompted widespread recognition for NbS from governments and international organizations. NbS are set to become an important tool for the implementation of the post-2020 Global Biodiversity Framework, and the UN Environment Program stated that forest based NbS are one of the most effective ways of combating climate change and should be part of every country's climate strategy.



## EU Non-Financial Reporting Directive (NFRD)

Introduced in 2018, the EU Non-Financial Reporting Directive is the main EU regulation obliging companies to report environmental, social, and governance (ESG) information. Applying to the 6,000 biggest companies in Europe, the law sets out the minimum level of climate and environmental information that major European companies should include in their annual reports. Research by the Alliance for Corporate Transparency, however, shows that the quality and relevance of the information provided is still poor<sup>10</sup>, thereby undermining the purpose of the Directive. Key findings show only 36.2% of companies report on their climate targets, 13.9% report on the alignment of such targets with the Paris Agreement/Science-Based Target, and only 6.6% use a below 2°C scenario in their risk assessment<sup>11</sup>. A proposal to reform the Directive is expected in March 2021 and key changes are expected.

The NFRD's scope is likely to be extended to include all large companies, increasing the number of companies mandated to report to more than 41,000 in the EU-27. It is also likely to address detailed mandatory reporting standards, including qualitative criteria for disclosure of forward-looking information, definition of information needed to understand companies' climate transition plans, disclosure requirements concerning environmental due diligence regarding management of risks and impacts in supply chains, and sector-sensitive mandatory Key Performance Indicators (KPIs) on climate change, biodiversity and other issues. The reform will also likely include the integration of sustainability reporting within annual reports and the clarification of the double materiality principle<sup>12</sup>. The development of the reform plans is already underway to underpin the legislation and facilitate reporting by companies<sup>13</sup>.

# HOW DO EUROPEAN COMPANIES IDENTIFY AND RESPOND TO DEFORESTATION CHALLENGES?

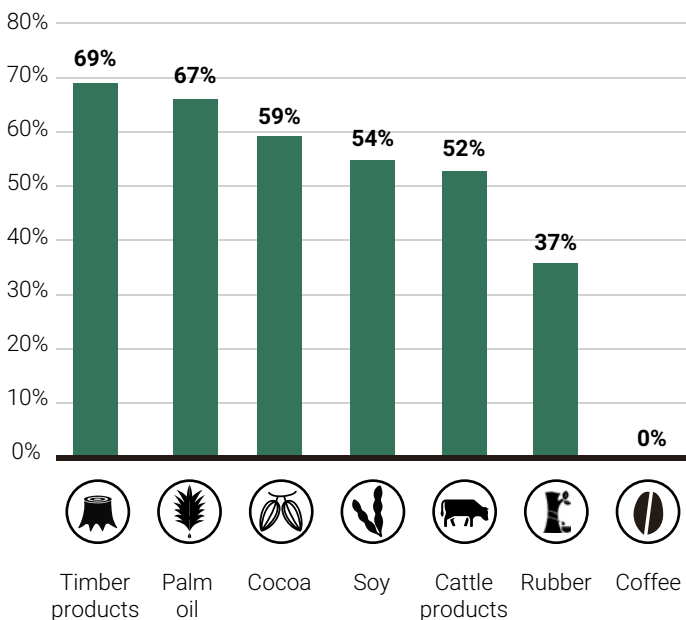
In 2020, 549 companies headquartered in Europe<sup>14</sup> have been requested by investors and purchasing companies to disclose environmental information regarding their impact on forests<sup>15</sup>. With a response rate of 33%, 181 have disclosed data through the CDP Forests Questionnaire. The data refers to the production, purchase, and sale of 7 FRCs or products containing the following: soy, palm oil, timber products, cattle products, natural rubber, coffee, and cocoa.

## Forest-related risks identified by companies

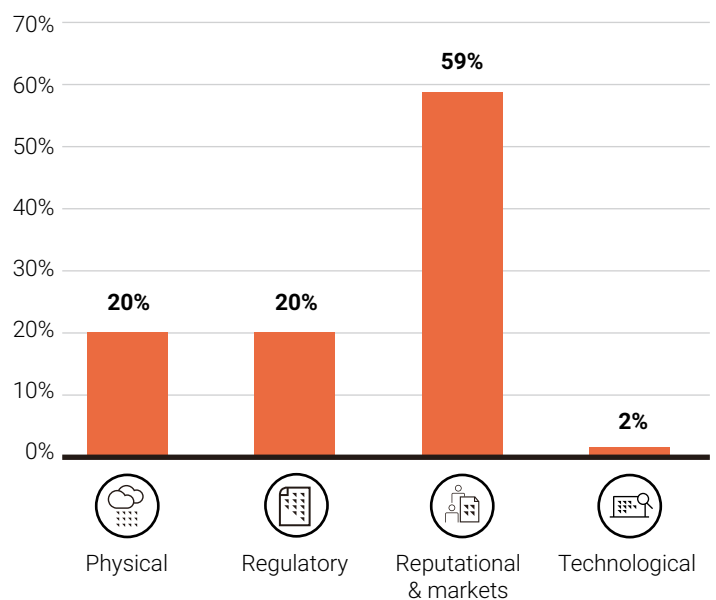
The market is increasingly aware of the risks that deforestation poses to the business of companies that produce, source, and sell FRCs. The most committed investors are engaging companies to ensure the improvement of processes for the identification, assessment, and management of said risks. In 2020, 69% of reporting companies have identified such potential risks, with some variation between disclosed commodities (Figure 1).

CDP Forests Questionnaire identified 4 different types of risks with the potential to have a substantive financial or strategic impact on business. Reporting companies have overwhelmingly identified Reputational and Market risks (59%), followed by Regulatory (20%) and Physical (20%) risks, with Technological risks only rarely identified (2%).

**Figure 1. Percentage of disclosing companies identifying at least one forest-related risk<sup>16</sup>.**



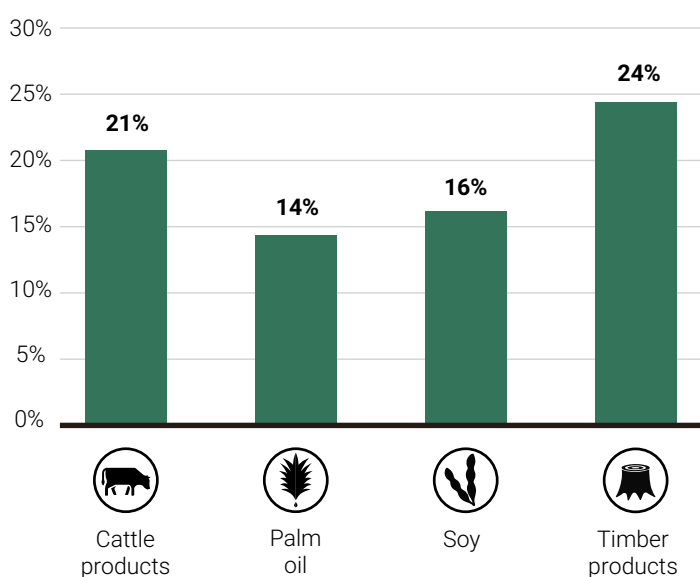
**Figure 2. Percentage by type of forest-related risk identified by companies**





As seen in previous years, companies reported to be most affected by reputational risks, as European consumers are sensitive to environmental issues. Last year, a Yougov survey<sup>17</sup> showed that 87% of European citizens support regulatory intervention to halt deforestation. Regulatory risks are more commonly identified by companies in the cattle and timber products value chains, but less so for palm and soy (Figure 3).

**Figure 3. Regulatory risks identified – disclosed commodity**



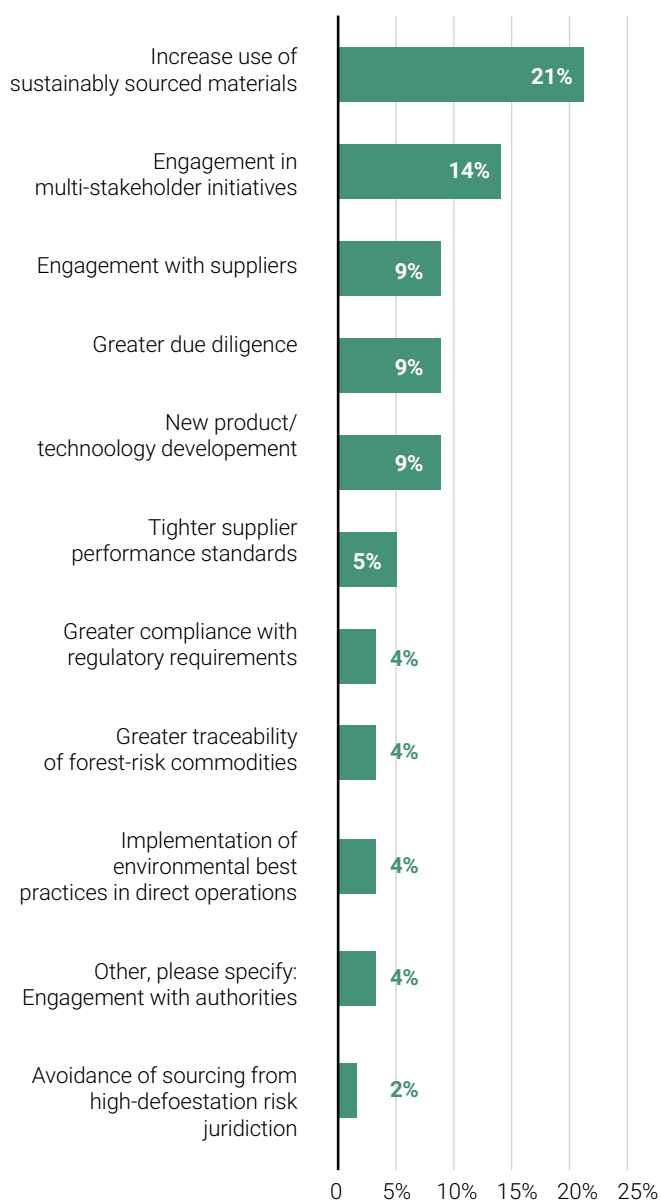
Among the companies that identified regulatory risk drivers, the responses indicate that companies see instability in regulation as the main driver of risk, with changes to national legislation and regulatory uncertainty being by far the most common responses. When looking at impacts, reputational and market drivers resulted mostly in brand damage and reduced demand for products and services. Regulatory drivers resulted in increased operating costs, fines, penalties or enforcement orders, and increased operating costs. Companies also reported physical impact drivers, such as supply chain disruption, and increased operating or production costs.

**Table 1. Primary potential impact – # of company responses**

Primary potential impact - number of company responses	
<b>Physical impacts</b>	
Supply chain disruption	20
Increased operating costs	14
Increased production costs	7
Reduction or disruption in production capacity	5
Change in revenue mix and sources	4
<b>Regulatory impacts</b>	
Increased operating costs	12
Fines, penalties, or enforcement orders	7
Supply chain disruption	7
Brand damage	4
Disruption to sales	4
Increased compliance costs	4
<b>Reputational and market impacts</b>	
Brand damage	67
Reduced demand for products and services	34
Increased operating costs	19
Change in revenue mix and sources	12
Increased production costs	9
Supply chain disruption	9
Disruption to sales	8
<b>Technological impacts</b>	
Disruption to sales	1
Increased capital costs	1
Increased compliance costs	1
Increased operating costs	1
Supply chain disruption	1

In terms of how companies respond to regulatory risks (Figure 4), the most commonly given response is the increased use of sustainably sourced materials (**21%**), followed by the engagement with multi-stakeholder initiatives (**14%**). It is interesting to point out that responses that are linked to policy rank low in companies' responses, such as greater compliance with regulatory requirements and engagement with authorities. The latter is especially relevant, as disclosing companies seem to be more inclined to engage in multi-stakeholder initiatives and with their suppliers, rather than with the public sector.

**Figure 4. Primary response to regulatory risks**



Companies were also asked to report on opportunities linked to the production, use, or sale of FRCs. Of the responding companies, 70% of them have been able to identify opportunities. 58 companies could also estimate the financial value of potential opportunities, which cumulatively reach almost US\$ 14,7 billion. Across all commodities, the most commonly identified opportunities are linked to an increased brand value, retaining or increasing customers and the possibility to enter new market niches with certified products.

Looking at individual commodities, opportunities come from different aspects of the businesses. For cattle products, the greatest opportunities can be generated by higher efficiency in the use of meat waste from the food industry. For palm oil, the greatest opportunities come from a strong communication to consumers of the potential sustainable nature of the palm oil used in companies' products. The same is true also for soy, as companies have recognized how sustainable food solutions are increasingly under scrutiny by consumers, who are in some cases willing to pay more for sustainable products and may potentially switch away from brands that are not offering the choice of deforestation-free products. For timber products, increasing the availability of renewable and certified products is the opportunity that can generate the highest financial impact.

## How do companies perform against their targets?



**18%**

with a target to source 100% certified no-deforestation compliant commodities and are making linear progress towards this target or have achieved it.



**11%**

have at least 90% of certified volume in a no-deforestation compliant certification per commodity.



**14%**

with a target to trace 100% their production/consumption back to at least municipality or equivalent and are making linear progress towards this target/have achieved this.



**23%**

can trace at least 90% of their production/consumption back to at least municipality or equivalent (no exclusions).



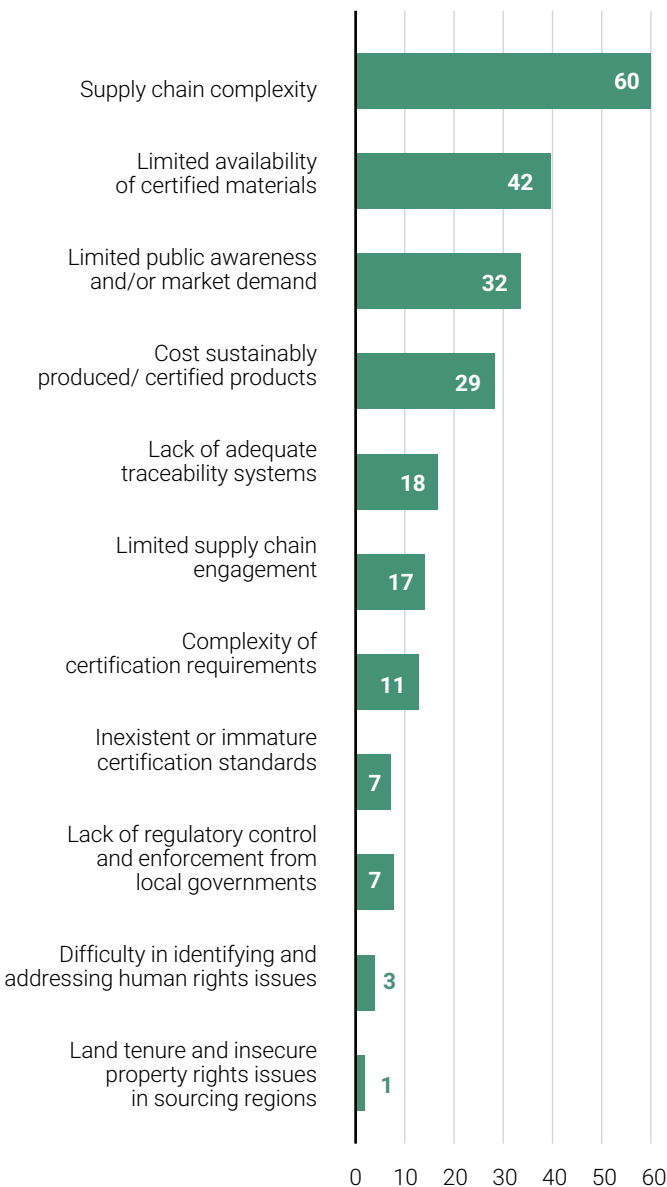
**46%**

have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments, full coverage and >90 % of total volume in compliance.

## Barriers and challenges

Companies face numerous barriers and challenges in the implementation of their no-deforestation and no-conversion commitments. Some of these obstacles do not depend on the action of individual companies, and some cannot be removed by market actors alone. In these cases, a strong regulatory intervention is needed.

**Figure 5. Barriers and Challenges identified by companies (number of companies)**



The predominant barriers and challenges identified by companies include supply chain complexity, limited availability of certified materials, limited public awareness and/or market demand, and the costs of certified materials. Several companies stressed the risk of not seeing a return on investment in sustainable production and sourcing, as customers and consumers are still not sufficiently aware of the value of certification.

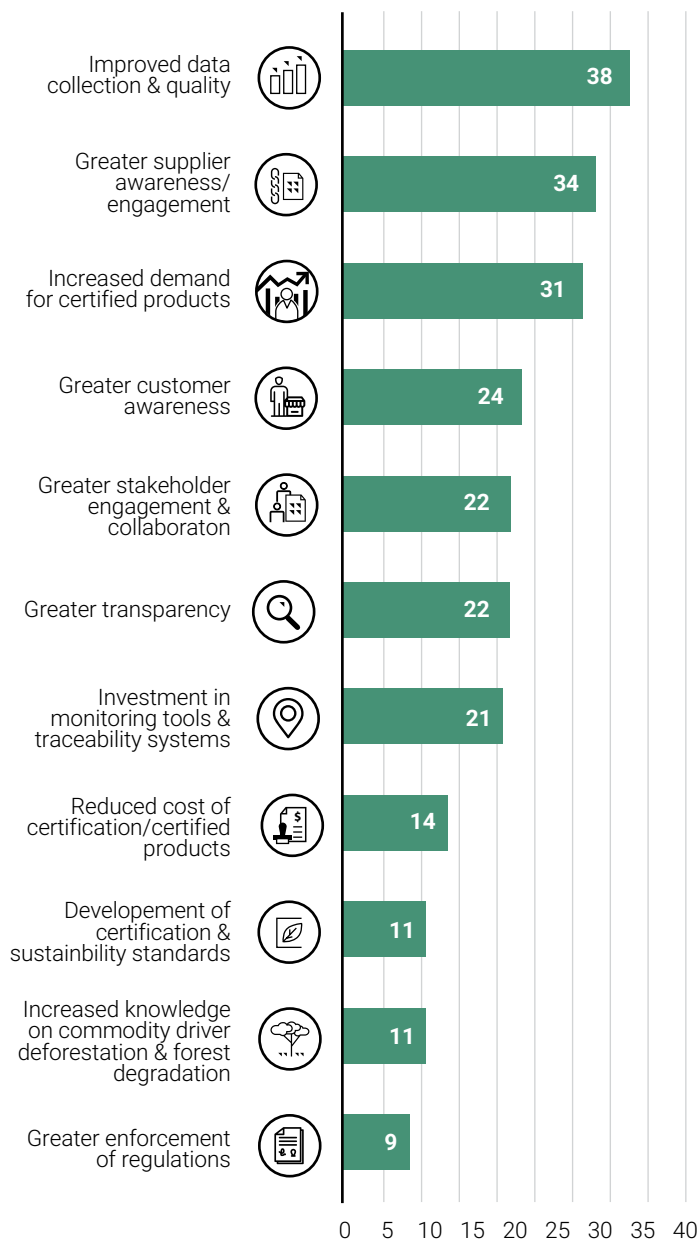
In this regard, some companies are calling for public sector interventions to develop a stable market for certified products, in order to ensure a constant demand, which would pave the way for further corporate investment to increase sustainable production of these commodities. In addition, several companies with a strong stakeholder engagement system in place, ask for regulatory intervention to support small and local businesses to increase the sustainability of their businesses and allow access to certification schemes, which are too expensive for them.



## Improvement measures

Companies were asked to indicate the main measures that would improve their ability to manage their exposure to deforestation and/or conversion of other natural ecosystems (Figure 6). It shows that companies recognize the need for high quality and comparable corporate data, as well as engagement and collaboration with suppliers. Companies also value demand-side measures, such as higher demand for certified products and customer awareness.

**Figure 6: Main improvement measures identified by companies (number of companies)**



## Participation in external activities

CDP asked companies about their participation in external activities and/or initiatives to promote the implementation of forest-related policies and commitments. Among the companies to which this question is applicable, **64,64%** participate in such activities, showing that most companies are externally engaged, but also that there is still room for improvement.

The most common type of activity in which companies participate is the involvement in multi-partnership or stakeholder initiatives (**48.62%**), followed by the engagement with NGOs and the involvement in industry platforms. Responding companies report little involvement in activities led by public authorities, such as engaging with policymakers or governments (**8.84%**) and involvement in jurisdictional approaches (**6.08%**).



## Jurisdictional Approaches<sup>18</sup>

Companies cannot deliver the 'no deforestation' and 'no conversion' ambitions at the pace and scale required without collaboration and alignment with other actors. Government involvement is increasingly recognized as an important catalyst for the success of efforts led by the private sector and civil society – especially at the sub-national level through multi-stakeholder 'jurisdictional approaches'. Jurisdictional approaches are a form of landscape-level approaches bringing together all relevant actors within a political administrative boundary to co-develop goals, align activities, and share monitoring and verification.

CDP is at the forefront of promoting private sector participation in jurisdictional approaches through its 'Enabling Jurisdictional Approaches to Halt Deforestation' project. The project intends to: 1) increase alignment and capacity of stakeholders to report by introducing new process and performance-related metrics relating to the quality of jurisdictional interventions for reporting by companies and sub-national governments, 2) increase market confidence in jurisdictional approaches and readiness and willingness of companies to incorporate jurisdictional approaches in their responsible sourcing strategy, and 3) increase in the number of sub-national jurisdictions in tropical forest countries that report on progress towards implementing jurisdictional approaches using standardized metrics.



# CONCLUSIONS AND RECOMMENDATIONS



## Recommendation 1

**As requested by the European Parliament, the European Commission should speedily present a legislative proposal for mandatory due diligence for forest risk commodities imported into the EU market.**

Despite the private sector's sustainability pledges, deforestation is on the rise. It is becoming increasingly accepted that voluntary commitments must be supported by mandatory legislation - companies are also asking for this policy support, as both lack of demand and competition may harm the competitiveness of deforestation-free products. The EU legal framework to halt and reverse global EU-driven deforestation is a fundamental step in this direction, engaging all actors in FRC supply chains. Including strong demand-side measures will be essential to support a stable market for forest-risk products and commodities produced in respect of higher environmental standards. As part of this due diligence regulation, CDP recommends to the EC:

- ▼ Provide binding definitions of what constitutes deforestation and forest degradation, as well as the scope of forest risk commodities, in line with the Accountability Framework Initiative.
- ▼ Ensure a level playing field between companies, where smaller businesses are not disproportionately impacted by high costs associated with due diligence.
- ▼ Integrate criteria and requirements already available from the Accountability Framework<sup>19</sup>.
- ▼ Ensure a strong enforcement system of the due diligence law, which includes civil liability and cooperation between Member State supervising authorities.
- ▼ For consistency with the World Trade Organization rules, the due diligence regulation would need to apply to forest-risk commodities produced both inside the EU as well as imported from other geographies.
- ▼ In the transition to enforcing the due diligence law, consider imposing lower import duties for FRCs complying with certain sustainable production and/or no-deforestation criteria.

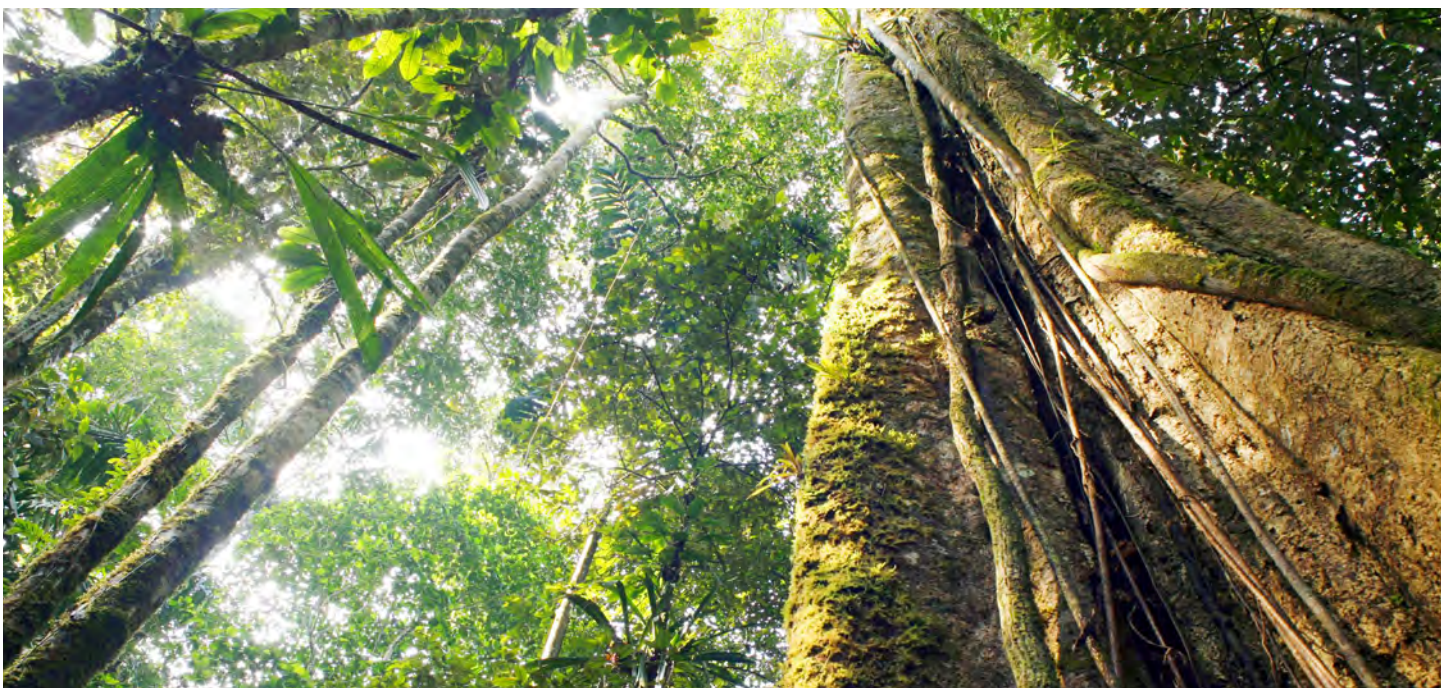


## Recommendation 2

### **Enhance policy conducive to more and better corporate environmental disclosure on deforestation.**

Corporate environmental disclosure of comparable, consistent, and quantifiable information on deforestation risk is the foundation for transformative action to eliminate it. Such data helps stakeholders including investors, buyers, policy actors, civil society, and consumers make smarter decisions and increase their expectations of companies with respect to sustainability. This ‘ambition loop’ in turn compels companies to act. Complementing the new due diligence legislation, recommended actions include:

- ▼ Support existing tools and approaches for companies to obtain, assess, verify and disclose information regarding i) the business risks posed by deforestation and environmental degradation to their business, both in direct operation and within their supply chains; and ii) the management of the risks and the actions taken to minimize the impact.
- ▼ A framework for corporate ESG reporting already exists in the non-financial reporting directive (NFRD). Streamlining of disclosure of non financial information will be essential to ensure policy coherence and to maintain the ability to effectively monitor business action.
- ▼ Increase accessibility to certification. Standards and labels are an important control mechanism in reducing the impact of FRCs and should thus remain a complementary aspect of policy in addressing EU-driven deforestation. Labels and standards could become a condition to access the EU market, yet there needs to be clear guidance. There is also a strong need for scientific analysis and comparison to ensure the quality of the label or standard. Public authority can support on this matter.







### Recommendation 3

#### **Ratchet up ambition to promote deforestation-free value chains in key global environmental governance platforms.**

In 2021, international policy efforts to promote sustainable development are reaching an inflection point. Multiple windows of opportunity are open to innovative, integrated solutions to climate change, biodiversity loss, and human development, which include the second cycle of the Nationally Determined Contributions (NDCs) under the Paris Agreement, the negotiations of the Convention for Biological Diversity (CBD) Post-2020 Global Biodiversity Framework and the kick-off of the decade of action to achieve the 2030 Sustainable Development Agenda and the Sustainable Development Goals. Recommended actions:

- ▼ Include forest-based Nature-based Solutions for climate targets at UNFCCC COP26.
- ▼ In the Post-2020 Biodiversity Framework, include targets for businesses in FRC supply chains.
- ▼ Align policy measures for deforestation-free value chains with other consumer countries, encouraging the adoption of similar criteria to those introduced by the upcoming EU legal framework, preventing the shift of the trade of FRCs from Europe to other markets.



### Recommendation 4

#### **Strengthen the role of business to reduce deforestation and biodiversity loss, as well as contribute to Nature-based Solutions.**

Policymakers and corporate actors must engage in mutually supportive, ambitious, and carefully implemented action, to ensure that EU-driven deforestation is reduced. Policymakers should provide strong policy signals and consistent guidance to companies on the following:

- ▼ Outline the business case for companies to incorporate forest-based NbS and biodiversity in response to environmental and development challenges, with targets set using the best available science and appropriate safeguards.
- ▼ Facilitate public-private partnerships for the implementation of NbS at all jurisdictional levels. Intra-governmental dialogue and mainstreaming of environmental targets will foster awareness and institutional stability across policy spaces, enabling companies to be more confident in their business planning. Further, the contribution of non-state actors should be captured in the monitoring and assessment of progress.
- ▼ Explore financial incentives for businesses to include biodiversity targets and objectives in their supply chain operations, ensuring alignment between the EU Biodiversity Strategy and the Post-2020 Biodiversity Framework.



## Recommendation 5

### **Engage governments of producing countries to stimulate a stronger enforcement of existing laws by local governments**

An enabling environment must exist to ensure that the production of FRCs will respect the required social and environmental laws and voluntary standards. European companies ask for stronger enforcement of national legislation in producing countries to ensure that the commodities they purchase are not illegally produced, the verification of the compliance of products with national law is challenging for companies and, in some cases, not a guarantee of legality due to potential corruption. Recommended actions:

- ▼ Further develop public-private partnerships in producing countries to monitor no-deforestation commitments and to unlock sustainable finance for forests. For example, using satellite monitoring systems, companies and governments can monitor and verify producers' compliance with no-deforestation policies.



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- 9 Binding legislation needed to stop EU-driven global deforestation, say MEPs: <https://www.europarl.europa.eu/news/en/press-room/20201001IPR88302/binding-legislation-needed-to-stop-eu-driven-global-deforestation-say-meps>
- 10 Landmark research on 1000 European companies shows troubling poor quality of reporting on sustainability issues: <http://allianceforcorporatetransparency.org/news/landmark-research.html>
- 11 Countdown for the reform that will overhaul companies' sustainability reporting obligations in Europe: <https://www.allianceforcorporatetransparency.org/news/countdown-reform.html>
- 12 Ibid.
- 13 Ibid.
- 14 Data in this section regard companies from the following countries: Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Lithuania, Monaco, Netherlands, Norway, Poland, Portugal, Russia, Slovakia, Spain, Sweden, Switzerland, United Kingdom. European countries absent from this list had no companies disclosing to the Forests questionnaire.
- 15 Investors and large purchasing organizations request environmental information from companies via CDP. This data is used by these stakeholders to inform decisions and drive environmental action. In addition, CDP runs an annual 'Non-Disclosure Campaign', which offers investors the opportunity to actively engage companies that have received the CDP disclosure request on behalf of investors but have not provided a response. Finally, supply chain member companies request their key suppliers to report environmental data through CDP's questionnaires.
- 16 The lack of responses on coffee is due to the fact that most companies state that coffee represents a very small fraction of their operations or because they do not collect enough data on the commodity.
- 17 Press release – 87 per cent of Europeans support new laws to combat global deforestation, new poll shows: <https://www.fern.org/publications-insight/press-release-87-per-cent-of-europeans-support-new-laws-to-combat-global-deforestation-new-poll-shows-1963/>
- 18 Press release – 87 per cent of Europeans support new laws to combat global deforestation, new poll shows: <https://www.fern.org/publications-insight/press-release-87-per-cent-of-europeans-support-new-laws-to-combat-global-deforestation-new-poll-shows-1963/>
- 19 Core Principles form the foundation of the Accountability Framework: <https://accountability-framework.org/the-framework/contents/core-principles/>

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