To Ms. Lila KARBASSI  
The Science-Based Targets Initiative

7 March 2023

Dear Ms KARBASSI,

The undersigned organisations call on you not to validate the target of JBS expected to be submitted to the Science-Based Targets Initiative (SBTi) this year following their climate net zero commitment in March 2021. We outline reasons below.

**JBS: a climate culprit**

World Animal Protection (WAP) has conducted bespoke research yet to be released based on life cycle assessment methodology comparing the emissions from the five biggest processors of poultry and pork meat globally. Together, they slaughter 11.5 billion chickens and 150 million pigs every year. JBS is at the top of the list with the highest emissions, comparable with around 14 million cars on the road annually.

The WAP research comes on top of other organisations’ research including a report from the Institute for Agriculture and Trade Policy (IATP) and the Changing Markets Foundation estimating JBS’s total emissions to be more than the entire emissions of Spain in 2021. JBS ranked top position in a list of 15 of the world’s largest meat and dairy companies for its extraordinarily large methane emissions. In fact, JBS’s estimated methane emissions surpass those of the next three companies on the list combined, and are even greater than the combined livestock methane emissions of France, Germany, Canada and New Zealand.

**JBS: deforester**

Further, JBS does not have a robust, universal policy to stop habitat destruction in upstream operations or sourcing despite numerous revelations of its connection to verified deforestation and conversion. Factory farming is driving the expansion of animal feed crop production, causing deforestation and habitat destruction as well as contributing to the
climate crisis. In 2022, research funded by WAP found that JBS was connected to multiple instances of deforestation in association with animal feed sourcing in Brazil.

JBS ranks the worst performing company in Mighty Earth’s Soy & Cattle Deforestation Tracker, which scores companies based on the extent, severity, and response to forest clearance in their supply chains. JBS performs appallingly across the board, achieving only 1 point out of a possible 100.

Chain Reaction Research estimated that JBS’s deforestation footprint in Brazil is up to 200,000 hectares in its direct supply chain, and 1.5 million ha in its indirect supply chain since 2008. Global Witness, Greenpeace, and EIA, among others, also report on JBS’s continued links to illegal deforestation, operating illegally on protected Indigenous land, and/or making purchases linked to human rights abuses.

JBS does not plan to eliminate deforestation across its global supply chain until 2035 – giving suppliers 12 more years to bulldoze.

We understand that SBTi requires that companies in the Forest, Land and Agriculture (FLAG) sector must commit to zero deforestation by 2025 when submitting their climate action plans for approval. This must go further. To safeguard human rights, wild animal habitat and secure a future for the world’s wild animals – whether endangered or endemic – ongoing deforestation should not be allowed.

Robust public commitments should be made in line with the Accountability Framework including:

a. Zero gross deforestation – with a cut-off date of 2020\(^1\) (meaning no deforestation accepted in land deforested after 2020)

b. Any important ecosystem (rather than only forests), including areas with High Conservation Value and High Carbon Stock

c. Free, Prior and Informed consent from Indigenous and local communities

d. Full traceability to the point of origin, or supplier that can document point of origin, or credible certification system\(^2\), or landscapes evidenced to be sustainably managed. Offsets are not accepted

e. Restoration of prior damage

f. Annual implementation monitoring and reporting

In the longer term, in addition to ensuring zero habitat destruction, businesses should reduce dependence on human-edible crops for animal feed as this form of animal feed production enables the growth of factory farming and is therefore inherently unsustainable.

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\(^1\) As stated in the Accountability Framework, this only applies if there are no earlier sector cut-off dates

\(^2\) We do not believe that credit trading is credible as it does not guarantee a deforestation-free supply,
JBS: greenwashing Scope 3 emissions

JBS currently fails to report its complete ‘Scope 3’ emissions where most of its climate impact lies.

It is imperative for SBTi to ensure that companies submitting targets for validation accurately capture the emissions they are responsible for and do not overestimate the impacts of their climate mitigation (reduction) activities. Failure to hold companies to account will lead to greenwash.

JBS refuses to disclose numbers of animals it processes annually, citing commercial-in-confidence. This lack of transparency means its climate net zero commitment rings hollow, and the public cannot have confidence in its target to achieve emissions reductions.

The company is on record indicating it will pursue market opportunities to increase sales of emissions-intensive meat and dairy, particularly in emerging markets. This is incompatible with a climate-safe future.

The WAP research using life cycle assessment methodology mentioned above has indicated that animal feed constitutes a majority of the company’s overall emissions profile for poultry and pork, consistent with other studies relating to the meat sector. A major gap for the meat industry has been accurately capturing and accounting for ‘upstream’ emissions in their businesses, both from sourcing of beef cattle and animal feed. It is especially carbon-intensive and destructive of nature when ecosystems are cleared to graze cattle or to plant crops to feed farmed animals.

JBS should not be allowed to lean on land-based carbon capture techniques to greenwash its climate performance when it continues to be connected to carbon release through deforestation in its sourcing practices. Land based [soil carbon/land-based] sequestration is impermanent and highly reversible, especially through farming techniques\(^2\), therefore the main priority should be keeping carbon in the ground and vegetation.

Neither should JBS be allowed to continue to increase absolute emissions whilst reducing emissions per kilogram or ton of meat processed in line with the ‘emissions intensity reduction’ method permitted under the SBTi FLAG guidance released in 2022.

The fact that JBS subsidiary, Pilgrim’s Pride UK, has a target to reduce Scope 3 emissions by 30% on an ‘emissions intensity’ basis by 2030 is indicative of a pathway that will fail to secure the climate safe future we want.

A recent report by Carbon Market Watch and the New Climate Institute published this month evaluating the transparency and integrity of companies’ climate pledges could not find any evidence of any planned deep decarbonisation measures by JBS. JBS does not have an emission reduction target alongside its net-zero emission target for 2040. Its interim targets for 2030 would lead to a 3% emission reduction compared to its reported 2021 emissions.
Considering JBS’s high share of global livestock methane emissions, JBS should report separately their methane and N2O emissions as outlined in the Institute for Agriculture and Trade Policy (IATP) and the Changing Markets Foundation’s Emissions Impossible: Methane Edition report’s recommendations.

Our asks for SBTi

That SBTi confirms that it will:

- **Not** validate the JBS target when it comes through and only approve climate action plans from companies that can demonstrate a robust plan towards reduced absolute emissions that are Paris-aligned and meet the 1.5°C target.
- Make JBS Target public and make the disclosure of target by companies a requirement of SBTi approval
- outline what steps it takes to independently assess the accuracy of the baseline year data submitted by companies or subsequent reported data to improve transparency and robustness of data and avoid companies submitting flawed data that misrepresents their emissions inventory.
- introduce penalties for companies found to have submitted misleading data and prohibit companies from misusing climate net zero commitments to market their green credentials prior to SBTi validation of their targets. JBS currently cites the Science-Based Targets initiative (SBTi) logo on the Achievements and Certifications page of its website, despite SBTi not having validated its targets.
- end the loophole within the FLAG guidance that allows for the meat sector to increase absolute emissions so detrimental to our climate, biodiversity and welfare of farmed and wild animals.

Due to the emissions-intensive nature of meat production, this will entail meat companies substantially diversifying into plant-based foods that are better for animals, our planet and climate.

We welcome the opportunity to discuss our concerns and proposals with you.

On behalf of WAP, we enclose a copy of the research referred to above to be released this month.

Sincerely,

Jacqueline Mills
Head of campaign, farming
World Animal Protection
Glenn Hurowitz,  
Founder and CEO, Mighty Earth

Nusa Urbancic  
Campaign Director, Changing Market

Shefali Sharma  
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Hannah Greep  
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Carina Millstone  
Director, Feedback Global

Monique Mikhail  
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