

CGF Forest Positive Coalition of Action Soy DCF Methodology

Version 1.1

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Anti-trust



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Guidance: Deforestation-and Conversion-free (DCF) Methodology



The CGF Forest Positive Coalition has developed recommended guidance on best practice for reporting on **%DCF volumes**. This document provides a proposed framework for credible reporting by companies.

The CGF FPC Soy Roadmap includes a proposed **KPI to track %DCF volumes**. The Coalition is also working to further **socialize** the methodology with the **wider sector**.

The proposed Soy DCF methodology was developed in 2023*, led by the Coalition's Soy Working Group with Proforest's support and inputs via a **stakeholder consultation**.

This guidance should be considered 'a living document' and will be updated as more progress is made by the Coalition.

*First published in the [Guidance on the Forest Positive Soy Roadmap](#)

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Overview of proposed methodology

Overview of proposed methodology



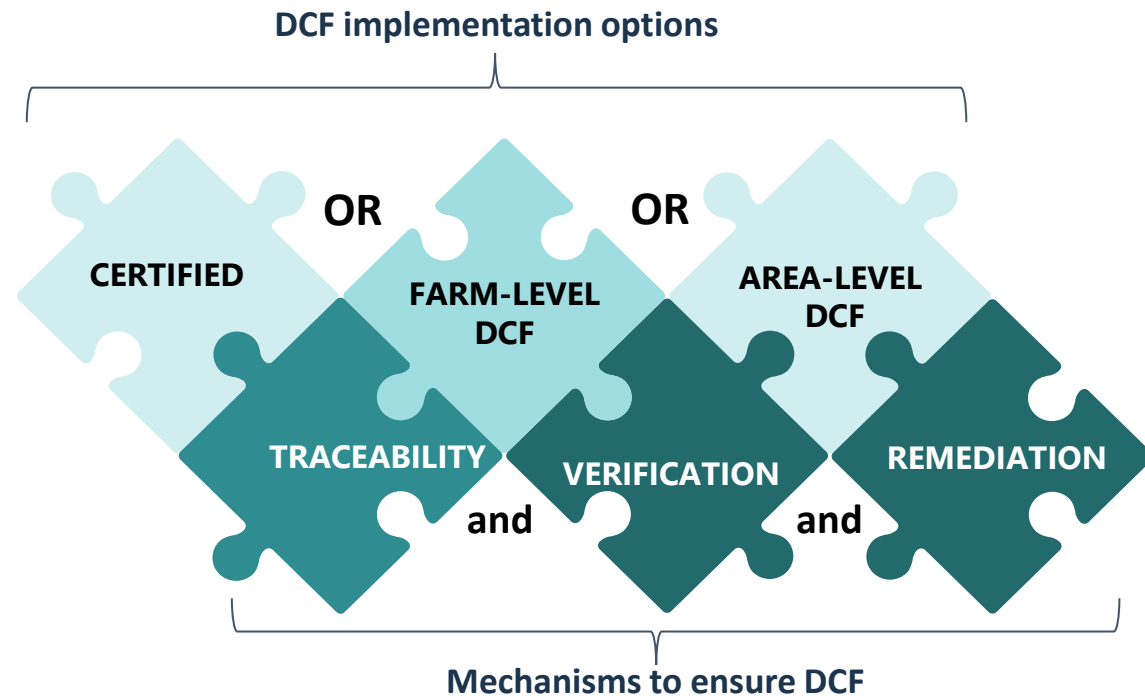
Sourcing DCF commodities is only one pillar in the Coalition’s recommended strategy towards a Forest Positive future. While the sole focus on companies’ own volumes could lead to segregation of supply, the combined actions at multiple levels enables the Coalition to contribute to tackling the complex challenge of commodity-driven deforestation and conversion.

Soy sourced volumes can be determined to be DCF via one of the implementation options: certification or farm-level DCF or area-level DCF. Volumes that are determined to be DCF via one implementation option should not be double counted even if DCF through additional implementation options. The compliance of DCF implementation options is ensured through systems for traceability and controls of supply chain flows, verification and remediation. While certification schemes already have these systems integrated, when adopting other implementation options, companies should individually deploy additional systems.

A combination of DCF implementation options can be implemented by suppliers, and downstream companies do not need to have primary information on origins. Also, when a direct supplier is DCF across their entire business, all and any soy volume sourced from them can be considered DCF.

Each company can decide if and how they will use each solution as well as how they will combine them with compliance with market requirements such as the European Union Deforestation Regulation (EUDR) (see Annex 1).

Note: The Coalition recognises the need for flexibility for embedded soy users and have developed recommended guidance on how embedded soy users can make progress towards DCF (see [Annex 2](#) of Soy Roadmap Guidance).



Overview of proposed methodology: Classifying volumes as DCF



1
Define volume scope

2

- Estimate your soy footprint
- Map your supply chain and soy origins using a risk-based approach

3
Understand if volumes can be classified as DCF OR not DCF

3
To be considered DCF, soy volumes need to be:

Certified or verified as compliant with a DCF standard **THAT** includes verification and traceability mechanisms which ensures segregation or site-level mass balance

OR

Traceable to a monitored farm that had no recent conversion to soy
AND
Controlled by a supply chain flow system that ensures segregation or site-level mass balance

OR

Traceable to an area where there is no or negligible risk of conversion to soy (country or subnational)
AND
Controlled by a supply chain flow system that ensures segregation or site-level mass balance

- Criteria to individually select DCF standards in pp.11- 13
- Current recommended DCF standards when Chain of Custody is Segregated or Site-level Mass Balance include: RTRS, Proterra, ADM, Amaggi, Bunge, Cargill, LDC, COFCO

- Some initial proposed criteria to define DCF farm-level monitoring systems in p.17
- Amazon Soy Moratorium ([ASM](#)) accepted as DCF when volume can be traced back to Brazilian Amazon and confirmed as compliant with ASM
- More criteria to be added

- Methodology and principles to identify no or negligible risk origins in pp.18-19
- Identification of DCF (no or negligible risk of conversion to soy) and at-risk municipalities for soy in Brazil was performed



DCF implementation options

Implementation Options to Deliver DCF



Certification:

The current Coalition approach considers standards approved by European Feed Manufacturers' Federation (FEFAC) as DCF as an entry point. This list includes both certification schemes (like RTRS, Proterra, ISCC) and company's standards. The Coalition developed additional recommended criteria on assurance and transparency (see criteria in following slides). FEFAC approved standards that also meet all recommended "essential" criteria can be considered as recommended DCF standards. The other FEFAC approved standards will be classified as progressing. The Coalition also added "desired" criteria to encourage standards to improve and follow best practices. These criteria might be recommended as essential criteria in the future.

The Coalition produced a list of recommended DCF certification schemes and Voluntary Sustainability Standards (VSS) using the criteria in the following slides. **Currently the recommended DCF standards are RTRS (when Chain of Custody (CoC) is Segregated or site-level Mass Balance), Proterra (when CoC is Identity Preserved, Segregated or site-level Mass Balance), ADM Responsible Soybean Standard (when CoC is Segregated), Amaggi Origins Field (when CoC is Segregated or site-level Mass Balance), Cargill Triple S (when CoC is site-level Mass Balance), Bunge Pro-S Assuring Sustainable Sourcing (when CoC is site-level Mass Balance), LDC Program for Sustainable Agriculture (when CoC is site-level Mass Balance), and COFCO International Responsible Agriculture Standard (when CoC is site-level Mass Balance) .**

For an overview of the results for each standard that was assessed against the Coalition's criteria, see the following slides.

***Note:** In the document, 'standards' refers to existing standards not developed by the Coalition that companies can decide to use independently*

Implementation Options to Deliver DCF



On the DCF standards assessment

The Coalition prioritized a subset of FEFAC approved DCF standards for the assessment. Individual members can decide to use the Coalition criteria to identify additional DCF standards provided that assessment results are publicly disclosed.

The assessments are based on publicly available information and all initial assessments were shared with the standards for feedback and revised where needed. For the full assessment, please reach out to forestpositive@theconsumergoodsforum.com.

Moving forward, if assessments require any updates, standard owners should share which criteria they are now meeting and the public evidence. The Coalition will then review the evidence and revise the assessment and list of recommended DCF standards once a year.

On the role of certifications

It is important to note that third-party certification schemes and private standards deliver other sustainability issues, such as human rights and biodiversity, beyond DCF volumes.

In particular, certification schemes are benchmarked as superior to private standards in terms of assurance and transparency, besides also including premiums to farmers, which is a key pillar to ensure permanence of positive impact. Additionally, certification schemes have their own procedures and rules on making DCF claims, for example, for RTRS (see [item 2.2.1 and 2.2.2](#)) and Proterra (see [item 3.3.3](#)).

Coalition members are encouraged to work to support certification schemes and DCF standards more broadly.

Note: In the document, 'standards' refers to existing standards not developed by the Coalition that companies can decide to use independently

Implementation Options to Deliver DCF



1. The DCF standard should include criteria to ensure:

- The unit of certification as the production unit in line with AFi definition (essential)
- Certified unit has a policy and reporting actions to ensure a zero tolerance approach for threats and violence against Forest, Land and Human Rights Defenders (desired)
- Certified unit has mechanisms in place to improve gender equality (desired)
- No-deforestation of natural forests, and the definition of natural forest is aligned with AFi (covered by FEFAC)
- No-conversion of natural ecosystems, and the definition of natural ecosystem is aligned with AFi (covered by FEFAC)
- A cut-off date of 2020 or earlier when law or sectoral agreements determine (covered by FEFAC)
- Compliance with forest laws in country of soy origin (covered by FEFAC)
- Soy is not linked with worst labour practices, and complies with the ILO fundamental Conventions (covered by FEFAC)
- Soy is not linked with land conflicts especially with indigenous peoples and local communities, and complies with United Nations Declaration on the Rights of Indigenous People (covered by FEFAC)
- Free Prior and Informed Consent of indigenous and local communities covering activities on their customary lands where plantations are planned for development (covered by FEFAC)
- Certified unit has a transparent conflict resolution system and grievance system that is open to all stakeholders to identify and remedy adverse social impacts linked to operations (covered by FEFAC)

Note: In the document, 'standards' refers to existing standards not developed by the Coalition that companies can decide to use independently

Implementation Options to Deliver DCF



2. The DCF standard should include a chain of custody or traceability system that:

- Collects and controls information on traceability to origin (essential)
- Allows Identity Preserved, Segregated or at least Mass Balance at site level (essential)
- Ensures volume control and avoids double counting (desired)
- Include minimum performance requirements for non-certified when allowing Mass Balance models (desired)

3. The DCF standard deploys assurance mechanisms at audit level that includes:

- An assurance methodology that includes guidelines for determining compliance and time for renewal of certificate (essential)
- Minimum performance level accepted: all items listed under 1 above are considered 'core' (essential)
- Specific qualifications and competencies for verification team, that include environmental and social expertise (essential)
- Requirement for auditors to solicit external stakeholder input, conduct field verification of compliance at the farm level and conduct document review during the audit process (desired)
- A written procedure or guidance on sampling is provided as a requirement to auditors (essential)
- A procedure to detect and address non-compliances in the audited unit (essential)
- Includes a grievance mechanism open to all stakeholders to identify and address non-compliances (essential)

Note: In the document, 'standards' refers to existing standards not developed by the Coalition that companies can decide to use independently

Implementation Options to Deliver DCF



4. The DCF standard has an accreditation or oversight mechanism which:

- Ensures independent verification of company's systems which requirements match the verification of the certified units (essential)
- Is a legal entity and has a defined organisational structure (essential)
- Conforms to relevant standards for independent assurance, such as ISO/IEC 17021-1:2015, ISO/IEC 17065:2012, ISO 9001 (desired)
- Has a mechanism to identify and address conflicts of interest (desired)
- Includes stakeholder consultation to develop/review the standard (desired)

5. The DCF standard ensures transparency by:

- Publicly disclosing the production standard criteria and assurance system criteria (essential)
- Making the certification or verification summary reports publicly available, including the verification scope, metrics, process, and results (desired)
- Publicly disclosing the list of certified units, including names, size, location and expiry date of certificate (desired)

Note: In the document, 'standards' refers to existing standards not developed by the Coalition that companies can decide to use independently

Implementation Options to Deliver DCF

FPC criteria	RTRS	Proterra	ADM	Amaggi	Bunge	Cargill	LDC	COFCO
2. The DCF standard should include a chain of custody or traceability system that:								
2.1 Collects and controls information on traceability to origin (essential)	Y	Y	Y	Y	Y	Y	Y	Y
2.2 Allows Identity Preserved, Segregated or at least Mass Balance at site level (essential)	Y	Y	Y	Y	Y	Y	Y	Y
2.3 Ensures volume control and avoids double counting (desired)	Y	Y	Y	Y	Y	Y	Y	Y
2.4 Include minimum performance requirements for non-certified when allowing Mass Balance models (desired)	N	Y	Y	Y	N	N	N	N
3. The DCF standard deploys assurance mechanisms at audit level that includes:								
3.1 An assurance methodology that includes guidelines for determining compliance and time for renewal of certificate (essential)	Y	Y	Y	Y	Y	Y	Y	Y
3.2 Minimum performance level accepted: all items listed under 1 above as essential or covered by FEAC are considered 'core' (essential)	Y	Y	Y	Y	Y	Y	Y	Y
3.3 Specific qualifications and competencies for verification team, that include environmental and social expertise (essential)	Y	Y	Y	Y	Y	Y	Y	Y
3.4 A written procedure or guidance on sampling is provided as a requirement to auditors (essential)	Y	Y	Y	Y	Y	Y	Y	Y
3.5 A procedure to detect and address non-compliances in the audited unit (essential)	Y	Y	Y	Y	Y	Y	Y	Y
3.6 Includes a grievance mechanism open to all stakeholders to identify and address non-compliances (essential)	Y	Y	Y	Y	Y	Y	Y	Y
3.7 Requirement for auditors to solicit external stakeholder input, conduct field verification of compliance at the farm level and conduct document review during the audit process (desired)	Y	N	N	Y	N	N	Y	Y

Implementation Options to Deliver DCF

FPC criteria	RTRS	Proterra	ADM	Amaggi	Bunge	Cargill	LDC	COFCO
4. The DCF standard has an accreditation or oversight mechanism which:								
4.1 Ensures independent verification of company's systems which requirements match the verification of the certified units (essential)	Y	Y	Y	Y	Y	Y	Y	Y
4.2 Is a legal entity and has a defined organisational structure (essential)	Y	Y	Y	Y	Y	Y	Y	Y
4.3 Conforms to relevant standards for independent assurance, such as ISO/IEC 17021-1:2015, ISO/IEC 17065:2012, ISO 9001 (desired)	Y	Y	Y	N	Y	Y	Y	Y
4.4 Has a mechanism to identify and address conflicts of interest (desired)	Y	Y	Y	N	Y	Y	Y	Y
4.5 Includes stakeholder consultation to develop/review the standard (desired)	Y	Y	N	N	Y	Y	N	Y
5. The DCF standard ensures transparency by:								
5.1 Publicly disclosing the production standard criteria and assurance system criteria (essential)	Y	Y	Y	Y	Y	Y	Y	Y
5.2 Making the certification or verification summary reports publicly available, including the verification scope, metrics, process, and results (desired)	Y	N	N	N	N	N	N	N
5.3 Publicly disclosing the list of certified units, including names, size, location and expiry date of certificate (desired)	Y	N	N	N	N	N	N	N

Implementation Options to Deliver DCF



Farm-level DCF:

The criteria for farm-level DCF is under discussion with key soy stakeholders. The objective is to reach a whole [production unit](#) approach aligned with AFi guidance, in which soy volumes can only be reported as DCF under this implementation option if no conversion of native vegetation after 2020 took place anywhere in the production unit, regardless of the area being used for soy or not. However, the Coalition recognises that:

- i. The Amazon Soy Moratorium (ASM) verifies compliance considering deforestation to soy, blocking purchases at farm level once non-compliances are found. Only soy area is monitored so if there is deforestation to other uses in the farm, it is not identified as a non-compliance.
- ii. Upstream traders are still progressing in mapping soy farms particularly for indirect sources and face technical challenges
- iii. The EU Regulation on Deforestation-free Products considers the plot of land as a unit to ascertain compliance

Therefore, the soy plot approach will be accepted to report DCF soy volumes for the moment.

Since 2023, the Soy Working Group has been working with traders through the Soft Commodities Forum (SCF) to identify and overcome barriers towards traceability to production unit even when traders source from intermediaries (indirect sources).

Implementation Options to Deliver DCF



Area-level DCF:

Assessing DCF compliance at the level of a sourcing area is a recommended approach that can be used when other DCF solutions are not available or feasible. The Accountability Framework indicates that if a company can demonstrate that products originate from sourcing areas in which there is no or negligible risk of non-compliance with DCF commitments or obligations, then the products may be considered to be DCF.

The Coalition, in collaboration with Trase and support from AFi Secretariat, developed a recommended methodology to assess the risk of soy origin being associated with recent ecosystem conversion to soy. This resulted in a distinction between DCF origins, where there was no or negligible risk of conversion to soy, and at-risk origins. This methodology has been tested for soy at municipality-level in Brazil and will be applied to other countries. For the full methodology tested for soy at municipality-level in Brazil see [Benchmarking commodity production regions for risks of deforestation and conversion](#) and below a summary:

1. To limit the scope of analysis to relevant soy producing municipalities, a threshold of 100 tonnes of soy production in 2022 (data from Municipal Agricultural Production, PAM-IBGE) was used to select municipalities for the analysis. This data is updated annually, but with a two-year delay (i.e., in 2024 data in PAM is for 2022).
2. Data from MapBiomas (2024) collection 8 was used to produce a municipality-level map of the total conversion of native vegetation between 2017 and 2021 that was planted with soy in 2022. This data is updated annually.
3. Municipalities were ranked (from highest to lowest) based on how much (in %) the area of native vegetation converted to soy contributed to total conversion to soy in Brazil in the five years prior to the assessment.
4. Municipalities at the bottom of the ranking (with lowest contribution to total soy conversion) that cumulatively make up 5%* of total soy conversion in Brazil during the specified time period were classified as DCF municipalities. All other municipalities were classified as 'at-risk'.

**This is the threshold that was agreed by the Coalition. Companies can choose to use a lower threshold (e.g., 1% as recommended by Trase and AFi Secretariat).*

5. Methodology to be updated to include a recommended maximum absolute area of conversion to soy in a municipality that is allowable in a DCF municipality to help prevent cumulative impacts being neglected in the long-term.

The risk assessment will be reviewed annually therefore classification of municipalities could change from at-risk to DCF and vice-versa. Municipalities that manage to significantly reduce deforestation and conversion to soy have the possibility to become DCF. **This approach should not be used to avoid sourcing from at-risk municipalities, but only to facilitate reporting.** It is essential for committed buyers to source from at risk regions, using certification schemes or farm-level DCF, as the goal is helping reduce deforestation and conversion in the sector.

Below are general recommendations for a credible methodology (*Additional proposed guidance is being developed by AFi on area-level monitoring and compliance and once available the recommendations below will be updated*):

- Adopt a territorial approach, e.g., to identify DCF origins in Brazil, all municipalities need to be assessed and ranked against the total conversion to soy in Brazil.
- The risk classification of subnational regions should consider effects of scale and spatial concentration of soy conversion. For example, in Brazil, biomes are subnational regions of different sizes and different levels of contribution to total soy conversion. Therefore, subnational risk classification is recommended at municipality or equivalent level, rather than at biome level.
- Use soy conversion, rather than all ecosystem conversion, as the basis for analysis in the case of Brazilian soy. Annual soy expansion data are available for Brazil, allowing area-based estimates of the direct conversion of native vegetation to soy each year (which may not be correlated with total ecosystem conversion). Given the role of crop expansion in indirect land-use change additional, secondary information on risk exposure is provided by estimates of total ecosystem conversion.
- Soy-driven deforestation and conversion is usually not immediate, soy is planted a few years after conversion. Therefore, it is recommended to consider a time window of 5 years, i.e., soy conversion is given by cumulative area of native vegetation converted between years 0-5 that was planted with soy in year 6.
- Data sources should consider official and credible soy conversion data and political boundaries. When data availability or quality is not ideal, higher risk should be assumed.
- DCF origins are identified as the origins that together represent a negligible fraction (below a % threshold) of total soy conversion in the country.
- Risk analysis should be updated annually, and methodology should be reviewed every 3 years.

Note: Companies can use other methodologies (e.g., SNDI in France, SCF methodology to define high-risk areas for the Cerrado)



Mechanisms to ensure DCF

Mechanisms to Ensure DCF



Traceability:

Regardless of the DCF implementation option, volumes can only be reported as DCF if there is a system in place to control supply chain flows, which do not need to be a full chain of custody but rather ensure traceability. Note that this does not only apply to certification but to the other DCF implementation options as well (farm-level and area-level DCF), although certification schemes will already have CoC systems in place. **The following systems are accepted as DCF:**

- Systems that ensure 100% of volume purchased is physically DCF, which can be achieved when:
 - the supplier is DCF across their entire business;
 - through Identity Preserved (IP), Segregated (SG), or DCF Controlled CoC models under certification schemes; or
 - through suppliers' physical segregation of DCF volumes.
- Systems that inform the % known as DCF in a mix (regardless of implementation option adopted) to encourage suppliers to become DCF across entire business by gradually increasing % DCF.
- Mass Balance (MB) Chain of Custody or equivalent systems that allow mix of DCF and non-DCF soy only at site-level **accepted until 2025**. MB at site-level is accepted as a transition pathway to DCF, and more details on how companies will transition to DCF will be added to this guidance. MB at site-level will be accepted as DCF until 2025 given the Coalition's recognition that IP and SG are not widely available in the market, DCF Controlled CoC and % known as DCF in a mix are not currently available, and that the Coalition's strategy is a combination of actions to progress towards DCF volumes, suppliers and landscapes. When sourcing MB, companies should recognise that they are still at risk for uncertified volumes and can take steps to control the risk (e.g., through supplier management systems). During the transition to DCF, companies are encouraged to support suppliers, certification schemes and others in the development of solutions that fully deliver DCF soy. *For the different types of Mass Balance, see [ISEAL Guidance Chain of custody models and definitions](#): Batch-level MB (p.10); Site-level MB (p.12); Group/country level MB (p.14).*

Any other systems (e.g., group/country level or area mass balance) are considered progressing towards DCF (see next page).

Mechanisms to Ensure DCF



Volume Reporting

Figure on how volumes sourced could be classified as DCF or progressing towards DCF:

% volume Progressing towards DCF

Volume sourced is under any of the following situations:

Standards considered DCF by FEAC benchmarking exercise but not by FPC, with IP, SG or MB (site or country/group level) CoC mechanism

DCF solutions recommended by FPC but with DCF control systems as country/group MB, area level MB

For embedded soy, combination of action and traceability

'Progress' is a temporary stage. Companies should include in their timebound action plan how they will move volumes to DCF.

% volume DCF

Volume sourced is under any or a combination of different DCF implementation options:



AND

Supplier has any of the below systems in place to ensure DCF control:

Site-level Mass Balance (until 2025)

% of DCF in a mix is known per site

100% of volume sourced is physically DCF (DCF supplier; IP, SG or MB controlled)

Mechanisms to Ensure DCF



Verification:

There is a very active discussion within the soy sector about what ‘verification’ means for reporting on deforestation and/or conversion free volumes. It seems likely that claims of verified DCF will increasingly be based on verification of the consolidated DCF information being published. However, it is not clear whether there will also be expectations for verification of the various data being used (e.g. of the mapping, the monitoring, the response to deforestation alerts etc.). The minimum verification criteria for DCF soy data will be discussed in the Soy Working Group and subsequent versions of this document will be updated to reflect their outcomes. Additional proposed guidance on verification is being developed by AFi and will be incorporated here once available.

Remediation:

The operationalization of DCF criteria includes identification of non-compliances and adequate response, which can include remediation plans that, if implemented, can allow previously non-compliant production units to become DCF again. The criteria to identify and respond to DCF non-compliances as well as to monitor and close remediation plans will be discussed and the outcomes of these discussions will be reflected in subsequent versions of this document. Additional proposed guidance on remediation is being developed by AFi and will be incorporated here once available.

Annex 1

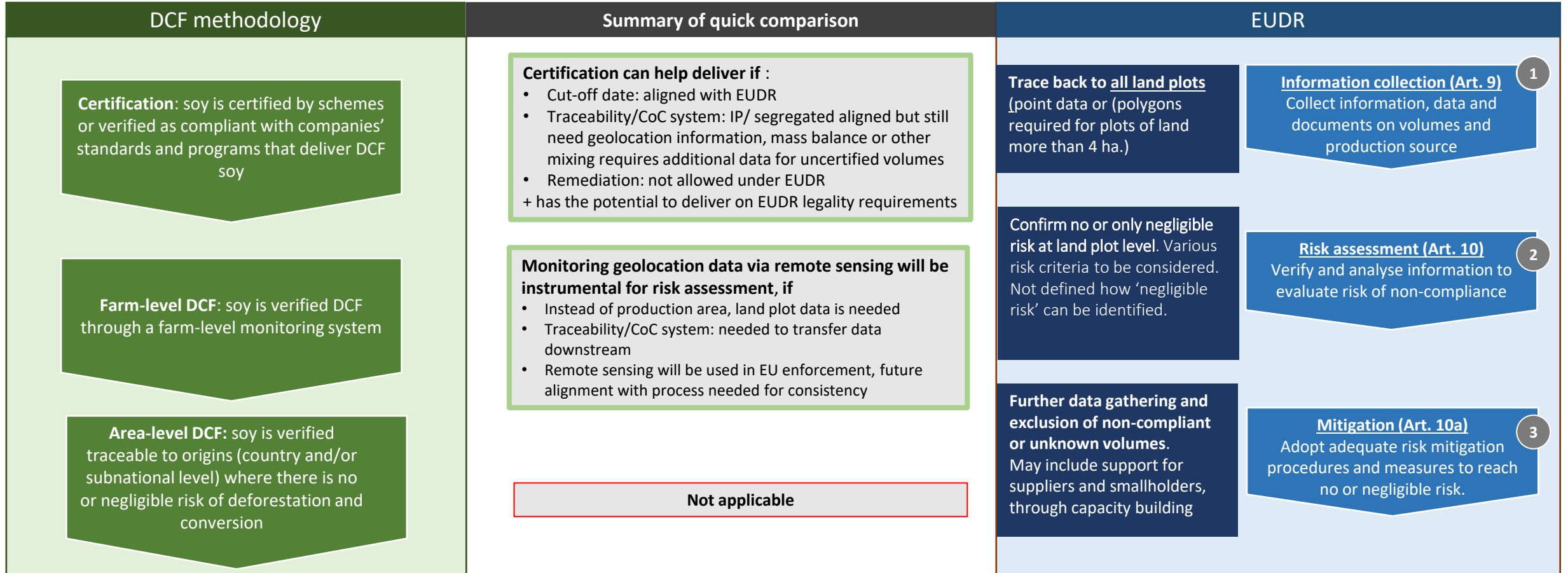
The DCF Methodology and the
European Union Deforestation
Regulation (EUDR)

DCF Methodology and the EUDR Due Diligence Process



The figure below assesses DCF pathways and means towards EUDR compliance but each company can decide if and how they will use each DCF solution as well as how they will combine them with compliance with market requirements such as the EUDR.

**tentative analysis based on evolving information on EUDR implementation and compliance*



A combination of certification data, remote assessments, and mapping of individual producers are likely the most effective mix towards DCF claims AND EUDR compliance IF traceability and data management systems from all suppliers are in place (upstream actors are able to pass on required EUDR information to their customers)



Annex 2

Tracker of Updates

Tracker of Updates to the Soy DCF Methodology



Version of the Soy Roadmap Guidance	Updated Content	Date
v.1	First publication	August 2024
v.1	Minor updates to language	September 2024
v.1.1	Added summary on classifying volumes as DCF, additional recommended DCF standards, update to order and language of DCF implementation options, and included area-level DCF methodology for soy at municipality-level in Brazil	July 2025