

To: LSE Consulting

From: ClientEarth, Conservation International, Fern and the Veblen Institute

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Subject: Comments on the draft final report / Sustainability Impact Assessment (SIA) in Support of the Association Agreement Negotiations between the European Union (EU) and Mercosur.

Please find below our comments and recommendations on the SIA in Support of the Association Agreement (AA) Negotiations between the EU and Mercosur. They focus mainly on the Environmental and Human Rights analyses. We are available for further discussion – see contacts at the bottom of the document – and thank you for the opportunity to contribute.

Key points

- Recommendations should take into account the fact that the negotiations have been concluded a year ago and should therefore address how the Commission could integrate the SIA findings at this stage of the process.
- Recommendations should go beyond action at country level and explore how the AA should be used as an incentive to implement them.
- The SIA conclusions and recommendations should be based on the latest available data, and take into account the most recent trends, where documented.

General comments

As highlighted in the *Trade for All* Communication, Sustainability Impact Assessments (SIAs) are key instruments in formulating sound, transparent and evidence-based trade policies. The purpose of an SIA is to inform trade negotiators and other stakeholders on the potential economic, social and environmental impacts of a proposed trade agreement, while it is being negotiated.

In the case of the Association Agreement (AA) between the EU and Mercosur, negotiations were closed on 28 June 2019, so the timing of the present draft final report raises questions about the extent to which the (ongoing) SIA process has actually fed into the work of the negotiators. This is particularly the case for the policy recommendations and accompanying measures, which were only included in the final draft report published in July 2020. All deadlines initially announced have been far exceeded. Such delays have

contributed to the SIA deviating further from various requirements under the Terms of references¹ and/or the Handbook for trade SIA².

Furthermore, the modelling of the draft interim report is still based on two scenarios: conservative and ambitious. Given that the final terms of the trade agreement have been known for more than a year, the SIA should take these terms into account to properly reflect their impacts on sustainability, and thereby contribute to the public debate around the conclusion and ratification process of the agreement. For example, recommendations like *“The EU should consider the use of quotas and partial liberalisation to minimise the impact in sectors such as beef, poultry and sugar.”* (p. 37) should be adapted to the current situation, e.g. assessing the impacts of the quotas that have already been defined. In addition, recommendations should go beyond action at country level and explore how the AA should be used as an incentive to implement them. For example, the initial SIA of 2009 mentioned the option to introduce the compliance with a set of sustainability criteria as a condition to reductions in tariffs³, which no longer appears in the report.

Finally, the draft final report does not assess the fiscal impacts of the AA, while the interim report stated that: *“The FTA will have an immediate fiscal effect associated with the loss of tariff revenue from the bilateral trade between the partners”*. Considering potential consequences in terms of redistribution and elimination of poverty, we recommend re-including specific analysis and recommendations on this in the final report.

Specific comments on the Social Analysis (section 3)

On Corporate Social Responsibility (CSR) / responsible business conduct (RBC), the draft interim report stated that: *“This SIA also assesses how the potential agreement could contribute to the uptake of internationally agreed principles and guidelines on corporate social responsibility (CSR)/responsible business conduct (RBC)”* (p. 39). However, this assessment has not been included in the report.

It would have been particularly relevant that the AA includes provisions on corporate responsibility supply chains, considering that several multinational companies having business relations with Mercosur have been exposed for serious violations of human rights, labor law and environmental standards⁴. Moreover,

¹ https://trade.ec.europa.eu/doclib/docs/2017/august/tradoc_155999.docx.pdf

² https://trade.ec.europa.eu/doclib/docs/2016/april/tradoc_154464.pdf

³ Final overview trade SIA EU-Mercosur Final Report, March 2009, p. 13 :

http://trade.ec.europa.eu/doclib/docs/2009/april/tradoc_142921.pdf

⁴ See for instance Devoir de vigilance et Déforestation. Le cas oublié du Soja, FNE, Mighty Earth et Sherpa, Mars 2019 :

http://www.mightyearth.org/wp-content/uploads/rapport_soja_WEB_bassdef2.pdf; Complicity in destruction II : How

northern consumers and financiers enable Bolsonaro’s assault on the Brazilian Amazon, 2019 : <https://amazonwatch.org/assets/files/2019-complicity-in-destruction-2.pdf> ; We must not barter the Amazon rainforest for burgers and steaks, Jonathan Watts, The Guardian, 2 July 2019 :

<https://www.theguardian.com/environment/commentisfree/2019/jul/02/barter-amazon-rainforest-burgers-steaks-brazil> ;

Imaginary trees, real destruction, How licensing fraud and illegal logging of ipe trees are causing irreversible damage to the Amazon rainforest, Greenpeace, March 2018 :

https://www.greenpeace.org.br/hubfs/Greenpeace_Report_Imaginary_Trees_Real_Destruction_March_2018.pdf?_ga=2.120888392.1558796435.1573643548-680280348.1573643548

there is no assessment of the effectiveness of article 11 of the Trade and Sustainable Development (TSD) chapter of the AA, which addresses only partially the wide range of social and environmental issues raised across supply chains where trade is likely to be expanded by the agreement.

Specific comments on the Environmental Analysis (section 4)

4.1. Methodology

The report indicates that the environmental analysis will include ecosystems and biodiversity; however, no such section can be found in the report. Recent studies commissioned by the Commission⁵ and the European Parliament⁶ concluded however that a novel approach building on a more systematic use of biodiversity indicators, as well an effort to specify measurable and verifiable commitments, were needed. Considering the extremely rich biomes and related ecosystem services that can be found in Mercosur countries, as well as the stakes around the development of the global post-2020 Biodiversity Framework under the Convention on Biological Diversity (CBD) – of which Mercosur countries are signatories – we strongly encourage a specific analysis of the current situation as well as a thorough assessment of the impacts of the AA on biodiversity. We also recommend an assessment of Article 7 of the TSD chapter on “Trade and biodiversity” and its ability to mitigate potential negative impacts of the AA on biodiversity.

4.2. Baseline

4.2.2. Overall environmental performance

There is an updated version of the EPI released in 2020⁷. However, even for this latest release, it is stated that “As the 2020 EPI builds on data published in 2019 and collected earlier, the results do not capture impacts from very recent events, including the burning of the Brazilian Amazon, wildfires in Australia, or the COVID-19 pandemic”.⁸ This data gap should be specified in the report.

Furthermore, since the EPI is an index that relies heavily on governance contexts, which change fast - hence a biennial release of the EPI - smoothing the data over a decade (Figure 13) and drawing conclusions on this basis seems irrelevant.

4.2.4. GHG emissions

Overall, the data used in this section is outdated and partial. Indeed, Figures 16 and 17, which show GHG emissions, exclude Land-Use Change and Forestry, while it is stated in this section that “In both Brazil and Paraguay, land use, land-use change and forestry (LULUCF), has been a key contributor to CO2 emissions.” This is therefore a major gap in presenting GHG emissions.

It is also mentioned in the same section that “Brazil’s emissions from LULUCF decreased over the 2005-2010 period, thanks to a steady decline in deforestation”. It is highly questionable to highlight this

⁵ [https://ieep.eu/uploads/articles/attachments/81fc8203-11a8-40db-8a63-e5751f030991/Trade%20and%20biodiversity%20-%20final%20report%20\(published\)%20-%20Feb%202018.pdf?v=63691176035](https://ieep.eu/uploads/articles/attachments/81fc8203-11a8-40db-8a63-e5751f030991/Trade%20and%20biodiversity%20-%20final%20report%20(published)%20-%20Feb%202018.pdf?v=63691176035)

⁶ [https://www.europarl.europa.eu/RegData/etudes/IDAN/2020/603494/EXPO_IDA\(2020\)603494_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2020/603494/EXPO_IDA(2020)603494_EN.pdf)

⁷ EPI 2020: <https://epi.yale.edu/downloads/epipolicymakerssummary9.pdf>

⁸ Press release, June 2020, p.2: <https://epi.yale.edu/downloads/epi2020pressreleaseworldenglish20200630.pdf>

statement while the mentioned data is clearly outdated and does not take into account more recent documented trends in terms of deforestation.

4.2.6. Forests

The report mentions a significant increase of deforestation in 2019, without drawing conclusions or assessing whether there is a risk that new trends emerge in the coming years. It also compares this increase to trends during the 1988-2008 to minimise it: an irrelevant comparison considering political commitments on deforestation that have been taken in the meantime by the Brazilian government. We question the use of some datasets and related conclusions, considering how these are outdated and do not take into account latest information, e.g. *“For the BLA, data show a sharp decrease in deforestation between 2004 and 2012. Deforestation decreased from 28,000 square kilometres in 2003 to a lowest of about 5,000 square kilometres in 2012”*. Where available, we recommend using the most recent issues of datasets to draw relevant conclusions, e.g.: instead of citing the FAO Global Forest Resources Assessment of 2016, the report should cite the most recent version, released in 2020⁹.

We strongly recommend to take into latest available data, including the Five-year assessment report of the progress on the New York Declaration on Forests¹⁰ and the Global Forest Watch global assessment¹¹ to detail the implications of the change of government in Brazil, and the extent to which the AA could lead to further deforestation in this context of changing governance.

Finally, we recommend assessing the drivers of deforestation beyond timber and wood products, such as agricultural production (e.g. beef and soy) and mining. This assessment should include the role of EU imports on forests in Mercosur countries. Datasets like trase.earth can support this analysis.

4.2.8 Agriculture and the environment

Data on the use of pesticides are outdated - data used for the figures only go up to 2015. Recent authorizations in Brazil of many pesticides considered as dangerous are not mentioned.¹²

Section 4.3. Analysis of impact

4.3.1. Impacts on GHG emissions

The study states that *“Globally, the AA is expected to have a negligible impact on CO2 emissions also considering that the estimated changes do not reflect possible positive future changes in energy efficiency and technology.”* However, it should be noted that one of the limitations of using the GCE model is that it looks at the overall impact of the agreement on e.g. CO2 emissions for the whole trade area. Therefore, any effects found are bound to be small - this should be specified in the analysis. In addition, the model does not take into account LULUCF-related GHG emissions.

⁹ <http://www.fao.org/forest-resources-assessment/2020>

¹⁰ <https://forestdeclaration.org/images/uploads/resource/2019NYDFReport.pdf>

¹¹ <https://blog.globalforestwatch.org/data-and-research/global-tree-cover-loss-data-2019>

¹² <https://unearthed.greenpeace.org/2019/06/12/jair-bolsonaro-brazil-pesticides/>

4.3.2. Impact on land use and deforestation

This section lacks a thorough assessment of the drivers of land use change and deforestation, as well as the related role of the EU imports of commodities associated with deforestation.

The report lays out key policies that have helped reduce deforestation, in particular in Brazil, and mentions recent concerning trends regarding these policies. However, despite mentioning briefly some concerning recent events, it does not review current implementation of these policies, and does not draw conclusions on indications that these are/could be downgraded/withdrawn. In particular, it mentions the creation of indigenous reserves as a key contribution to the slowdown in deforestation, but does not expand further on recent worrying trends regarding indigenous lands, while these have been documented, for example by Global Forest Watch: *“Spatial analyses of the pattern of primary forest loss in Brazil also indicate troubling new hot spots of loss within indigenous territories in the state of Pará. In the Trincheira/Bacajá indigenous territory, deforestation as a result of illegal land-grabbing accelerated in 2019. Mining threatens forests in other Brazilian territories, such as Munduruku and Kayapó. Meanwhile, Brazil’s administration proposed new legislation in February that would allow commercial mining and oil and gas extraction within indigenous territories.”*¹³

The report also states that *“improvement in productivity in the Cerrado has often been cited as an example of success of how to employ state-of-the-art agricultural technology to expand agricultural and pasture land without deforestation”* without backing this affirmation with any reliable source or concrete example.

Beyond focusing on opportunities to increase productivity and the implementation of the Paris agreement as key mitigation measures to potential negative impacts of the AA, this section should highlight the need to ensure national legal frameworks recognise and protect indigenous land rights. Implementing the NDCs is essential but not be sufficient as such to alleviate detrimental impacts on forests, especially in a changing political environment. For example, the Brazilian NDC’s commitment on forests is to reach zero illegal deforestation by 2030, but it is questionable to rely solely on a commitment focusing on illegal deforestation in a context of deregulation.

We recommend going beyond the implementation of NDCs and include complementary measures at national and local levels that can tackle deforestation effectively.

4.3.7. Potential impact on MEA enforcement in Mercosur countries

In Table 26, we recommend adding the following recommendations to mitigate risks and optimise benefits:

- Implement and revise NDCs, as planned in the Paris agreement
- Implement National Biodiversity Strategies and Action Plans (NBSAPs) under the CBD
- Secure indigenous peoples’ and local communities’ land rights - this needs to be fully recognised as an environmental measure: the critical role of indigenous peoples and local communities in

¹³ <https://blog.globalforestwatch.org/data-and-research/global-tree-cover-loss-data-2019>

preserving biodiversity on their lands has indeed been recognised in the latest IPBES Global assessment.¹⁴ Moreover, the Paris Agreement explicitly recognises the rights of indigenous peoples and local communities, as well as the value of their traditional knowledge.

4.3.8. TSD approach in the EU-Mercosur AA

We welcome the assessment of the TSD chapter that reflects a number of civil society concerns regarding the effectiveness of the provisions contained therein. The report underlines in particular that strengthening public accountability mechanisms in the current EU-Mercosur AA could maximise its positive impact on the enforcement of environmental regulation. Policy options include strengthening the role of DAGs by allowing them to bring up complaints to the TSD subcommittee. It would be worth adding that such an option first requires the introduction of formal obligations for the Commission to respond to concerns raised by DAGs.¹⁵

We recommend adding in this section a specific recommendation on the need for the TSD chapter to include a broader component on forests beyond sustainable management of forests, with specific provisions on the drivers of deforestation, such as agricultural expansion and mining.

4.4. Conclusion

4.5. Policy recommendations

The recommendation that *“Mercosur and the EU should fulfil their Paris Agreement commitments and achieve their GHG emissions targets as detailed by their Nationally Determined Contributions”* should be reinforced through the including the revision process of NDCs in the recommendation.

Additional recommendations should be included on:

- The implementation of National Biodiversity Strategies and Action Plans (NBSAPs) under the CBD
- Securing the rights of indigenous peoples and local communities, as a key environmental measure

The recommendation that *“Mercosur and the EU should adopt a multi-faceted approach to the enforcement of TSD provisions”* is welcome. However, besides strengthening the enforcement of the TSD provisions, these provisions also need to include specific and actionable obligations that derive from parties’ international commitments.

Specific comments on Human Rights Analysis (section 5)

In this section we recommend providing an overview of the state of ratification and state of implementation of relevant human rights conventions and including related recommendations to mitigate risks and optimise benefits, as done in the previous section for MEAs.

¹⁴ <https://ipbes.net/news/Media-Release-Global-Assessment>

¹⁵ <https://www.documents.clientearth.org/wp-content/uploads/library/2017-10-27-a-formal-complaint-procedure-for-a-more-assertive-approach-towards-tsd-commitments-version-1.1-ce-en.pdf>

We also recommend the use of the UN official terminology of “Indigenous peoples and local communities” throughout the text.

Finally, we recommend the inclusion of a section on land and environmental defenders, many of whom are indigenous. Latest assessment by Global Witness¹⁶ concluded that Latin America has been the worst-affected region for killings of land and environmental defenders since Global Witness began to publish data in 2012. In 2019, the Amazon region alone saw 33 deaths. Brazil ranks third in terms of killings of land and environmental defenders, with 24 deaths in 2019. Almost 90% of the killings in Brazil were in the Amazon.

5.3. Analysis

5.3.2 Right to the Enjoyment of the Highest Attainable Standard of Mental and Physical Health

The report states that “*the AA is expected to induce improvements in SPS controls and standards across Mercosur countries, while not having an impact across EU member states*”. However the AA aims to reduce non tariffs barriers, including the controls and the customs requirements - see for instance Article 8 of the "Customs and Trade Facilitation" Chapter of the Agreement¹⁷, article 12 of the same chapter¹⁸, or article 7 of the "Sanitary and phytosanitary measures" chapter¹⁹. Further explanation on why these changes are not expected to impact EU member states and would precipitate improvements in Mercosur countries would be welcome, particularly as the report goes on to note that any improvements brought by increased trade would be dependent on “*the guarantee of robust monitoring/enforcement mechanisms*” (p. 159), which the reduction of non-tariff barriers seems to make less likely.

The report also indicates that “*the agreement reaffirms the ‘precautionary principle’ and the right of both sides to adopt measures to protect human, animal and plant health, including in situations where scientific information is not conclusive*” (p. 159). However, the report fails to identify the limits of the agreement’s reference to the precautionary principle. The reference to the precautionary principle only appears in the TSD chapter (with low binding force) and not as an express exception to the precise and binding rules contained in the SPS, TBT, Trade in Goods and Customs and Trade Facilitation chapters of the Agreement. The way in which the precautionary principle is defined in the TSD chapter is also distinct and more restrictive than the way this concept is interpreted in EU law. Indeed, according to the EU Court of First

¹⁶ https://www.globalwitness.org/en/campaigns/environmental-activists/defending-tomorrow/?utm_source=hootsuite&utm_medium=global_witness&utm_campaign=defenders

¹⁷ This article provides for the establishment of "partnership programmes facilitating exchanges" for the benefit of approved economic operators who must meet criteria predefined by each of the Parties. However, once approved, these economic operators will be able to benefit several benefits that may include "low documentary and data requirements" and “ low rate of physical inspections and examinations”.

¹⁸ It provides that the Parties shall "concentrate customs control and other relevant border controls on high-risk consignments and expedite the release of low-risk consignments".

¹⁹ “The importing Party may require the approval of the establishments for the import of animals, animal products, products of animal origin and animal by-products. The approval shall be granted without prior inspection of individual establishments by the importing Party once the importing Party has recognised the official control system of the competent authority of the exporting Party and has authorised the import of the concerned products and if the exporting Party provides sufficient guarantee that they fulfil the sanitary requirements of the importing Party.”

Instance²⁰, the precautionary principle: “allows the institutions to take protective measures without having to wait until the reality and seriousness of those risks become fully apparent or until the adverse health effects materialise”.

5.2.3. Rights of Indigenous Peoples

We welcome the fact that this section has been significantly developed, in particular as regards baseline data on legal frameworks and recognition of rights of indigenous peoples and local communities in each country.

The inclusion of references to communities’ cultural right to maintain and use their own language is appreciated, although more complete data for each Mercosur country and broader consideration of cultural rights along the ‘structural, process and outcome’ indicators framework employed elsewhere would improve the quality of this analysis, which currently rests heavily on outcome and structure, with limited consideration of process.

Finally, we strongly recommend the analysis to reflect data related to the prevalence of attacks and murders targeting some indigenous peoples seeking to enact their land and cultural rights.

5.3. Analysis

5.3.3. Rights of Indigenous Peoples

1. Effects of investment, natural gas extraction, and agribusiness on Indigenous Land Rights

This section refers to examples of frequent threats, violence, intimidation, and killings of indigenous activists, especially in Brazil, but does not elaborate on these in connection to investment, natural gas extraction and agribusiness. Regular reports by Global Witness and Front Line Defenders²¹ can support further analysis of these trends.

2. Impacts of investment and agribusiness on indigenous health

The analysis acknowledges the risk, and documented reality, that agricultural expansion can cause water and other environmental pollution. By way of contrast it highlights that communities have sometimes been able to negotiate “benefits such as access to drinking water supply” (p166) with companies. While it is true that some communities have managed to negotiate such agreements, it is questionable to describe what amounts to a remedy to a problem caused by agricultural expansion as a ‘benefit’.

It is also worth pointing out that the research paper cited²² for making this point specifically focussed only on six service sectors (tourism, financial services, energy services, information and communications technology and movement of people), and thus drew no conclusions around agribusiness. It also offers

²⁰<http://curia.europa.eu/juris/document/document.jsf?text=&docid=202052&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=267102>, para. 109 à 111.

²¹ <https://www.frontlinedefenders.org/en/resource-publication/global-analysis-2018>

²² Cali, Ellis & Willemstad te Velde, 2008 <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/3482.pdf>

no examples in any of the Mercosur countries of communities negotiating the kinds of remedial measures described.

5.5. Policy Recommendations

We recommend strengthening the wording of the recommendations. In particular, the recommendation that “*Brazil should consider retracting its proposed bill to open indigenous lands for natural resources*” appears weak considering the severity of potential consequences and the very real risk of violation of international human rights law that this represents. Brazil should retract this proposed bill.

We recommend that the explanatory text accompanying the recommendations spells out more the prerequisites for effectiveness. For example, “*Mercosur and EU governments should continuously monitor the enjoyment of all the four rights and use the instruments available under the Agreement to flag changes in the human rights situation. With proper accountability mechanisms, as well as adequate flanking measures in place, the AA has the potential to provide important benefits to the participating countries.*” – it should be noted that these proper accountability mechanisms and flanking *measures are not currently in place.*

The report highlighted that in some instances a lack of available information hindered the analysis (i.e. infant mortality rates). We recommend a policy recommendation around availability of information.

The initial SIA of 2009²³ had made a number of recommendations around cooperation and political pillar structures, but as this part of the AA is not yet public and has not been included in the impact assessment, we can make no judgements about whether similar recommendations would still be relevant.

Specific comments on Sectoral Analysis (section 6)

6.3. Sectoral analysis: Agriculture

In their comments on the interim report on the SIA, some CSOs, including the Veblen Institute, questioned the lack of inclusion of some sensitive products such as soybeans and poultry meat, as such inclusion would be necessary to understand the results of the application of the CGE model.

However, the draft final report does not include a specific section about soy, while the impacts of soy production on the environment and human rights are mentioned several times across the report. Considering that the output of oil seeds and vegetable oils could increase by 2,3% to 3.2% in Brazil and 1,4% to 1.9% in Argentina²⁴, we strongly recommend including this component in the sectoral analysis.

²³ http://trade.ec.europa.eu/doclib/docs/2009/april/tradoc_142921.pdf

²⁴ According to the conservative and ambitious scenarios in the draft final SIA, p.33-35.

6.3.1. Beef

Use of land

This section lacks an explanation of the model(s) used to draw conclusions.

Furthermore, the statement that “*in Mercosur, only 40% of the land is used by agricultural activities. This suggests that there is a large room for expansion of the agricultural frontier.*” is highly questionable. The fact that only a portion of land is currently used for agriculture does not necessarily mean there is large room for expansion, for several valid reasons including: protected areas, indigenous lands, and unsuitability for agricultural production. The fact that Amazon cattle ranching is relatively unproductive - the Amazon Environmental Research Institute (IPAM) showed that 65% of deforested land is used for low-quality pasture - should be taken into account to prioritise recommendations on improving the productivity of the sector to prevent further expansion.

Human rights

This section is not elaborated enough and is not backed by any relevant resources. The fact that it does not include a specific analysis on the impact of beef production on indigenous peoples’ land rights is a major gap, especially considering recent trends.

Policy recommendations

This section should include a recommendation about the effective implementation in the EU of the ban on recourse antibiotics as animal growth promoter including for “products of animal origin exported from third countries to the Union”, as planned by the EU Veterinary Medicines Regulation (2018) as this is relevant for Mercosur countries. Indeed, according to a report by the Institute for Agriculture and Trade Policy, Brazil would have increased its use of antibiotics by 68% between 2000 and 2010 and its consumption of antibiotics is expected to double again by 2030²⁵.

6.4.2. Chemicals and Pharmaceuticals

The report confirms that EU exports to Mercosur for the category “chemicals, rubber, plastic” could increase by 47 to 60%. The EU chemical industry already exports to Mercosur countries products that are banned in the EU because of their impact on environment and the health of producers and consumers²⁶.

We can therefore question the statement in this section that “*There are not foreseen relevant impact in the environment and human rights*” in this section. We strongly recommend elaborating on this issue.

We also recommend that the analysis not only targets the Mercosur countries, but also the EU, where these substances are produced.

²⁵ <https://www.cultureviande.fr/actualite/mercosur-canada-la-filiere-alerte-sur-les-consequences-des-accords/>

²⁶ “Pesticide giants make billions from bee-harming and carcinogenic chemicals”, Public Eye, February 2020; “Stop the poison boomerang”, Foodwatch Background Paper, April 2020; “EU-Mercosur: Double standards concerning agrottoxics. How the EU and German companies profit from the sale of pesticides detrimental to biodiversity”, Greenpeace Germany – May 2020, “Hazardous pesticides”, Rosa Luxembourg, 2020

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