



Certified responsible?

Critical assessment of the Round Table on Responsible Soy

by **GMWatch, Friends of the Earth, Corporate Europe Observatory**
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Europe imported 34 million tonnes of soy in 2009-10.¹ Over half of the soy imported into Europe is genetically modified (GM).² Most of the soy is used as animal feed by the meat and dairy industry and to produce biofuels to run cars.

Since the late 1990s, concern has grown about the negative environmental and social impacts of soy cultivation in producer countries. In particular, concerns were raised about the destruction of the Amazon rainforest and other vulnerable ecosystems for soy expansion.

In response, various voluntary certification schemes have been set up which claim to make soy production more sustainable. The Round Table on Responsible Soy (RTRS) is the best known and the best funded of these initiatives – but also the most controversial.

I. What is the RTRS?

The Round Table on Responsible Soy (RTRS) calls itself a “global platform composed of the main soy value chain stakeholders”. It claims to promote responsible soy production “in order to foster economical, social and environmental sustainability”.³

Members include genetically modified seed and agrochemical producers Monsanto, Syngenta,⁴ and DuPont/Pioneer (through its membership of the soy producers’ association Aapresid),^{5 6} grain traders ADM, Bunge, and Cargill; and energy giant BP.⁷

RTRS was first proposed in 2005 by WWF after some agribusiness multinationals abandoned the more stringent Basel Criteria for Responsible Soy Production.⁸ The Basel Criteria exclude GM soy and have strict requirements regarding deforestation and land use. Nevertheless, nearly 10 percent of the total Brazilian soy crop has met the Basel Criteria for several years to date.⁹

In order to get the big agribusiness multinationals in the soy supply chain to participate, RTRS adopted a watered-down approach. That meant ignoring the GM soy issue and weakening the

requirements around deforestation. The resulting RTRS criteria fail to address the critical issue of GM. They also allow deforestation of the Amazon and other valuable ecosystems like the Chaco and Cerrado, as long as the land is in an area “zoned” for agricultural use.¹⁰

The credibility of any agreed criteria through the RTRS process has been weakened by the resignation of two major Brazilian organisations in the soy supply chain. Aprosoja (representing 6000 soy producers in Mato Grosso) left in May 2009 and ABIOVE (representing the Brazilian vegetable oil sector) left in March 2010.¹¹

The big picture problems with RTRS

RTRS’s “responsible” soy will mostly go into animal feed and biodiesel production. But using large tracts of land in the Global South to feed animals in the intensive farms of the Global North, or to keep European cars running, cannot be defined as responsible. This is especially true in the context of the current global food crisis and resource crunches.

Almost all soy – whether GM or non-GM – is grown in large intensively farmed monocultures in South America. Here, soy expansion is a major factor in tropical deforestation,¹² loss of biodiversity, and climate change. The resulting export of nutrients from the Global South to the Global North destroys the environment and soil quality in producer countries. Food security is damaged, as small-scale farmers producing staple food crops are routinely evicted to create large-scale soy plantations.¹³

Mechanised soy farming employs far fewer people, contributing to rural unemployment. It also raises the price of staple food crops.¹⁴ These effects are impossible to address through sustainability certification schemes that work at farm-scale level.

Even setting aside these macro-level impacts, the RTRS criteria fail to guarantee any level of “responsible” soy production, due to the reasons below.

II. Problems with RTRS certification criteria

Health impacts of GM soy and pesticides

The RTRS standard allows genetically modified Roundup Ready (GM RR) soy to be defined as “responsible”. The RTRS recently proposed including a non-GM option in its standard, but this is not operational.¹⁵ In any case, the vast majority of the soy certified by RTRS will be GM.

GM RR soy cannot be defined as responsible or sustainable. Many independent scientific studies show that GM RR soy poses serious hazards to human and animal health and the environment. Some of these studies directly compare GM and non-GM soy and find that GM soy has more negative effects than non-GM soy.¹⁶

GM RR soy is designed to tolerate the herbicide Roundup, the active ingredient of which is glyphosate. The Roundup Ready gene enables the farmer to spray the field liberally with glyphosate, which kills the weeds but not the crop. The spread of GM soy around the world has led to huge increases in the use of Roundup.¹⁷

In South America, most GM soy is sprayed with Roundup from airplanes or from giant

“mosquito” tractors with wide arms, causing herbicide drift onto houses and schools. The impacts are especially serious if spraying is done in hot weather, with rain afterwards. People report that through rainwater, large quantities are spread onto people’s skin, land on crops, and find their way into animals. In Argentina, where over half the cultivated land is given over to GM RR soy, Roundup spraying has unleashed a human rights tragedy on a massive scale. Rural people report escalating rates of birth defects, cancers, and other serious health problems associated with the spraying.^{18 19 20 21}

These concerns gained scientific weight in 2009, when the Argentine scientist Prof Andrés Carrasco (lead researcher of CONICET, the National Council of Scientific and Technical Research, Argentina) announced his research team’s findings that glyphosate-based herbicide causes malformations in frog and chicken embryos, in doses much lower than those used in agricultural spraying.²² Glyphosate was found to interfere with key developmental mechanisms, which resulted in the malformations. These mechanisms are the same as those in humans, meaning that the findings are relevant to humans.

After Carrasco’s findings were released, a group of environmental lawyers petitioned the Argentine government to ban glyphosate.²³ Sprayed residents took their case to a regional court and won a ban on the spraying of glyphosate and other agrochemicals near residential areas. Other regions have also restricted spraying.²⁴ In February 2011, in a landmark ruling, the court of Santa Fe province in Argentina (a GM soy-producing area) banned the spraying of glyphosate in the vicinity of urban areas.²⁵

Local people’s concerns about Roundup are not limited to health effects but include damage to food crops, livestock deaths and pollution of soil and water. Land that has grown GM RR soy is poisoned with herbicides and cannot be used for other crops.^{26 27}

Against this background of fierce and growing resistance to the GM soy/Roundup farming model in soy-producing countries, the RTRS will certify GM soy grown with Roundup as “responsible”. The GM RR soy crop relies upon heavy spraying with Roundup, and increasingly on the application of a variety of other pesticides due to emergence of weeds resistant to glyphosate. The RTRS’s criteria on spraying of pesticides will not adequately protect people, livestock, and the environment from harmful exposures.

Roundup used on GM soy is toxic

Carrasco’s study is one of many independent peer-reviewed toxicological studies that challenge claims of safety made for Roundup. These studies show that Roundup damages human cells and DNA, harms reproduction and development, is an endocrine disruptor, promotes cancer, and causes birth defects.²⁸

Proponents of GM RR soy often cite as proof of Roundup’s safety its approval by regulators around the world. However, the dossiers that led to these approvals are based on non-peer-reviewed industry-generated studies that are kept secret from the public and independent scientists. The studies’ status as “grey literature” means that they can neither be examined nor replicated – two basic principles of scientific credibility. The World Health Organization’s classification of glyphosate as category III, “slightly hazardous”, is similarly based on mostly unpublished industry studies.²⁹

What is known is that independent studies have found harmful effects from Roundup at doses

far lower than the “no effect” levels claimed by industry studies. For example, for developmental toxicity, industry studies and EU regulators claim a “no observable adverse effect” of 300 mg/kg. For reproductive toxicity, the “no effect” level is 700 mg/kg.³⁰ Yet independent studies have found toxic reproductive toxicity at much lower levels.^{31 32 33} Most worryingly, effects are found at concentrations far lower than those used in agriculture and below the maximum allowed residue levels in food and feed.³⁴

Roundup also has harmful and long-lasting toxic effects on the environment. These include increased plant diseases, damage to beneficial soil organisms,³⁵ and toxic effects on amphibians^{36 37 38} and earthworms.³⁹

Claims of the environmental safety of Roundup have been overturned in courts in the United States and France. In New York in 1996, a court ruled that Monsanto is no longer allowed to label Roundup as “biodegradable” or “environmentally friendly”.⁴⁰ In France in 2007, Monsanto was forced to withdraw advertising claims that Roundup was biodegradable and leaves the soil clean after use. The court found that these claims were false and misleading, and fined Monsanto’s French distributor 15,000 Euros.⁴¹

GM herbicide-tolerant crops are escalating pesticide use

The overuse of Roundup due to the expansion of GM RR crops has led to the rapid spread of glyphosate-resistant superweeds, which have rendered farmland unusable and even broken farm machinery. Farmers have had to resort to other and potentially even more toxic herbicides to control weeds, such as 2,4-D and paraquat (which is banned in the EU). The GM industry, in turn, is developing GM crops engineered to tolerate other herbicides, including dicamba and 2,4-D.⁴²

This chemical treadmill constitutes an unsustainable method of agriculture, which the RTRS perpetuates by certifying GM soy as “responsible”.

RTRS will not prevent deforestation

The RTRS standard’s deforestation clause (4.4)⁴³ allows soy cultivation to replace natural habitat under certain circumstances. These conditions are too weak to protect the Amazon rainforest or other vulnerable High Conservation Value lands from being destroyed for soy expansion. Equally, the clause allows many other areas that have great value to local communities to be destroyed, as long as they are zoned for soy expansion in line with the standard’s highly problematical criteria.

A detailed analysis of the clause follows.

4.4 Expansion of soy cultivation is responsible.

Note: This criterion will be revised after June 2012 if RTRS-approved maps and system are not available.

4.4.1 After May 2009 expansion for soy cultivation has not taken place on land cleared of native habitat except under the following conditions:

4.4.1.1 It is in line with an RTRS-approved map and system (see Annex 4) or

See comments on Annex 4 below.

4.4.1.2 Where no RTRS-approved map and system is available:

a) Any area already cleared for agriculture or pasture before May 2009 and used for agriculture or pasture within the past 12 years can be used for soy expansion, unless regenerated vegetation has reached the definition of native forest.

RTRS allows any land that has been cleared of forest/native habitat up until May 2009 to be certified for “responsible” soy production. This moves the start date five years forward from the 2004 limit set by the Basel Criteria for Responsible Soy Production⁴⁴ and three years forward from the limit set by the soy industry association ABIOVE.⁴⁵

The Basel Criteria go further, stipulating that no land cleared after 1994 can be used for soy production unless compensatory measures are taken to restore or protect other areas of environmental value.⁴⁶

b) There is no expansion in native forests

The key question is: Who decides what is and is not native forest? No mechanism is defined for specifying who makes this decision. All the mapping requirements, set out below, will not even be triggered, if a decision is made by someone (potentially, even the party interested in clearing the land) that the land of interest is not native forest.

This clause short-circuits all the superficially impressive wording of the remainder of Section 4.4 and Annex 4.

c) In areas that are not native forest ... expansion into native habitat only occurs according to one of the following two options:

Option 1. Official land-use maps such as ecological-economic zoning are used and expansion only occurs in areas designated for expansion by the zoning.

Typically these zoning decisions are made at the local/state level. The people who make the decisions are susceptible to inducements from parties interested in clearing specific pieces of land. In short, if you are interested in clearing a piece of land and you are willing to provide inducements, you can get it zoned to allow clearing. The recently completed “land zoning” process in Argentina showed falsified environmental impact assessments and no participation by indigenous peoples, resulting in a huge area being zoned as agribusiness land.⁴⁷

The words of the RTRS standard sound reassuring, but in reality they provide little or no protection. The weakness of the RTRS’s deforestation and land use criteria will enable environmental and social destruction to continue in the name of soy expansion.

If there are no official land use maps then maps produced by the government under the Convention on Biological Diversity (CBD) are used, and expansion only occurs outside priority areas for conservation shown on these maps.

Such maps are not widely available. Many soy-producing countries have not undertaken a thorough process of CBD mapping.

Option 2. An High Conservation Value Area (HCVA) assessment is undertaken prior to clearing and there is no conversion of High Conservation Value Areas. Note: Where neither official land use maps nor CBD maps exist, Option 2 must be followed.

Again, the key question is: Who will undertake the HCVA assessment? This is crucial to the validity of the outcome. Presumably the party interested in clearing the land will contract “experts” to do this. It is likely that the interested party’s desire to clear the land will influence the outcome of the assessment. Also, no rules ensure that this will be an independent, impartial, and evidence-based process – the minimum required for a valid and environmentally “responsible” outcome.

4.4.2 There is no conversion of land where there is an unresolved land use claim by traditional land users under litigation, without the agreement of both parties.

RTRS’s land use clause does not forbid expansion into lands claimed by traditional land users unless those lands are already under litigation. This is a very weak requirement that does not protect from exploitation the vast majority of lands that are important to traditional land users.

The evolution of the land use clause is an example of the progressive weakening of the RTRS standard. A general ban on expansion into “local people’s lands” in the 2009 standard⁴⁸ has been watered down in the 2010 standard to a ban on expansion into areas where there is “an unresolved land use claim by traditional land users under litigation”.⁴⁹

In reality, few indigenous people and peasant farmers use the law to resolve land disputes because by the time the legal process has gained momentum, the soy producers have already brought the bulldozers in and cleared the land. As a result, the indigenous people and peasant farmers rely on direct action such as land occupations, literally placing themselves between the bulldozers and the disputed land.⁵⁰

There is a well documented history of illegal land grabbing for soy expansion by wealthy producers. Indigenous people and peasant farmers are evicted, in some cases through violence. Officials often turn a blind eye. Cases of land grabbing for soy expansion – and resulting land disputes between soy producers and rural people – have been documented in Argentina,⁵¹ Paraguay,^{52 53 54} and Brazil.^{55 56}

RTRS’s weak land use criteria will enable soy tainted with a history of human rights abuses, violence, and oppression to be certified as “responsible”.

Annex I: Guidance

4.4.1.2 c) Options 1 and 2 only apply for areas which are not native forest (as stated in 4.4.1.2 b and c). Therefore native forest cannot be deforested even if an official land use map (Option 1) permits this.

Again, who says that any given piece of land is or is not native forest? The Guidance specifies that for HCVA assessment, RTRS or HCV network-recognized assessors must be used. But there are no specifications for determining who is qualified to decide whether a piece of land is or is not native forest.

4.4.1.2 c) Option 1: Maps used for this purpose have been subject to adequate and effective public consultation.

Only here in the guidance is public consultation mentioned, and no clear process is defined. Is it sufficient to have a small announcement in the back of the local newspaper? Or a notice posted on a bulletin board at the local government office? How are communities far away from newspaper stands, or people who cannot read, to know about the consultation? How would they get the money to travel to a public consultation meeting?

Again, the local zoning option is the one that will be used by most parties interested in clearing a particular piece of land. The mention of “public consultation” does not create a reliable process that assures that the zoning decision will be made impartially or in a socially and environmentally responsible way.

- 4.4.1.2 c) Option 2: HCVA assessment should be undertaken using the existing guidance e.g. HCV Toolkit. The assessors should be recognized by RTRS or the HCV network.

No process exists within the RTRS standard for “recognizing” HCVA assessors, and neither does the HCV Network have such a process in place. The HCV Network has a database of practitioners, but the network explicitly states that it does not check practitioner credentials or take responsibility for the competence of practitioners registering on the database.⁵⁷

The conclusion is that although the words of the RTRS Guidance sound reassuring, there is no mechanism or structure in place to assure the competence or impartiality of the HCVA assessment specified in Option 2. Therefore, it would be easy to undertake an assessment that has a predetermined – and biased – outcome.

Annex 4: RTRS Approach to Responsible Conversion

There will be two phases:

- For the short term, an interim approach will be used. This is set out in criterion 4.4 of the RTRS Standard for Responsible Soy Production Version 1.0.

See comments above that address the standard directly.

- For the medium term, the RTRS will develop official RTRS approved macro-scale maps which will provide biodiversity information and a system which will orient responsible expansion of RTRS soy. This work will be carried out as described below and should be completed before 31st December 2012 for Argentina, Brazil, Bolivia and Paraguay.

The RTRS standard allows soy expansion on land cleared of forest or native habitat after May 2009 – if “it is in line with an RTRS-approved map and system” (4.4.1.1). But these RTRS maps do not exist yet. Agustin Mascotena, the director of the Round Table on Responsible Soy, said in a recent interview that the mapping process has not begun. In fact, RTRS is still looking for funding to support it.⁵⁸ The massive scale of the task means that it is likely to take many years.

RTRS-approved maps and system

I. Summary

National level macro-scale maps will be created through a multi-stakeholder process, which will provide guidance on responsible expansion. These maps will indicate four categories of area ...

Macro-scale maps are not sufficient to assure that any specific piece of land that some party wishes to clear is in fact a candidate for “responsible expansion of soy production”. A process needs to be put in place for assessment of specific pieces of land. This Annex does not provide this, and therefore does not provide a complete process for classifying land for “responsible” clearing.

Guidance will also be produced on how to undertake the HCVA assessments required for expansion in Category II areas.

Without spelling out clearly and completely the guidance mentioned in the sentence above, it is impossible to assess the effectiveness and fairness of the proposed RTRS process for expanding soy production. The one sentence provided is inadequate to address this issue.

2. Development of generic global methodology

2.1 RTRS will convene an international multi-stakeholder group to develop the generic global methodology to be used to develop the national macro-scale maps....

3. Production of national macro-scale maps

3.1 Establish a national multi-stakeholder group in each country (as a sub-group of the RTRS National Technical Group) to oversee the map development process. The group should include both representation of each RTRS constituency and technical expertise. Note: for Argentina, Brazil, Bolivia and Paraguay this group will include the 3 national members of the global multi-stakeholder group....

There are major problems with the proposed RTRS mapping project.

First, this is a huge project, it is not even funded yet, and therefore it could be another year or more before it begins. Once begun, it will take years to complete. The process of writing the RTRS standard has taken five years and the mapping task is larger in scope and technical challenges than the standard development process. To expect it to be completed in five years is optimistic. We can, therefore, expect that the interim process outlined in Section 4.4 of the standard will be operational for the foreseeable future. We have already provided detailed criticism of that interim process (see above), concluding that it offers little or no protection to land that should be protected for either social or environmental reasons. The conclusion is that the RTRS system will offer no real protection from deforestation or from destruction of other lands deserving of protection for several years at least.

Second, as mentioned above, once the mapping process is complete, a strong system for protecting HCVAAs will still not be assured. The macro-scale maps that this process will generate will be too superficial to assure that any piece of land under consideration for clearing is dealt with justly, impartially, transparently, and on the basis of facts relating to social and environmental responsibility. The Annex devotes only three sentences to the topic of creating such a system, which only state that generic methods for HCVA assessments will be developed. They do not go into any detail or mention the terms “transparent”, “third-party”, “impartial”. Also, they only refer to assessment of land in Category II (“areas with high importance for biodiversity where expansion of soy is only carried out after an HCVA assessment which identifies areas for conservation and areas where expansion can occur”). This leaves Category III areas, which are classed as having “lower conservation importance”, but which may have high social or environmental value, vulnerable.

We conclude that the process outlined in Annex 4 is misdirected. Instead of conducting a slow, costly and ultimately imprecise macro-mapping process, during which a very weak interim process will be in place that allows developers to clear virtually any piece of land that they wish (see analysis above of section 4.4 of the RTRS standard), it would be more effective to set in place immediately an impartial, third-party, transparent, evidence-based process for evaluating any piece of land that anyone wishes to clear for soy expansion. Such a process is lacking in section 4.4 of the standard and in Annex 4. It appears that the process presented in Annex 4 is designed to give the impression that RTRS is taking dynamic measures to guard against deforestation and unsustainable soy expansion, when the real result would be years of operation

under an interim process that provides no protection from deforestation.

We would suggest that the approach taken in the Basel Criteria would solve a major part of the problem: “Primary vegetation and High Conservation Value areas should not be converted to agricultural land”.⁵⁹

RTRS criteria on labour conditions would not protect workers from current widespread abuses

RR soy production requires very little labour, apart from operators of tractors and airplanes. Nevertheless, the RTRS labour conditions clause has been watered down in the 2010 standard from the 2009 standard.

For example, for 2009 standard specifies that workers must only be expected to work overtime “in short and exceptional circumstances (e.g. peak harvest)” and adds, “Where there is no trade union or representative organization agreement, the farm can have only two exceptional periods per crop cycle.”⁶⁰ The 2010 standard leaves out mention of short and exceptional circumstances and replaces it with the meaningless phrase, “for limited periods of time (eg. peak harvest, planting)”.⁶¹ The problem with this is that even a long period of time is “limited” if a projected end date is named. The 2009 limit of “two exceptional periods per crop cycle” is missing in the 2010 standard. The 2010 standard only has the less rigorous requirement that “average working hours in the two-month period after the start of the exceptional period still do not exceed 60 hours per week”.⁶²

Even when measured against national laws, this is not impressive. In Argentina, according to HSBC Bank, the legal maximum working time is 8 hours/day and 48 hours/week. But the regular working week cannot exceed 44 hours/week for daily work or 36 hours/week where work is performed in hazardous or unhealthy environments.⁶³ Soy production, with its exposure to powerful farm machinery and toxic pesticides, could be defined as hazardous and unhealthy. So the RTRS criterion is far less rigorous than the national law of Argentina.

The inability of the RTRS criteria to improve labour practices was illustrated recently. Three RTRS member companies that will promise to respect RTRS’s labour conditions criteria were charged with severe exploitation of workers. RTRS members Nidera,^{64 65} Monsanto,⁶⁶ and DuPont/Pioneer⁶⁷ were variously accused by the Argentine authorities of human trafficking, exploiting workers, and keeping workers in slave-like labour conditions. However, the RTRS criteria will apply only to that part of a company’s soy production that will be labelled “responsible”. The alleged abuses concerned not soy but maize seed production – so they would not be addressed by the companies’ membership of the RTRS.

It is ethically unacceptable to greenwash such inhumane practices with a “responsible” label.

No-till farming with GM soy is not environmentally responsible

The RTRS standard names no-till agriculture, which avoids ploughing, as one of “the most appropriate techniques to maintain soil quality and minimize soil erosion” (5.3). In the no-till with GM crops farming model, weeds are controlled through herbicide applications rather than mechanically, through ploughing.

While no-till farming as practised as an integrated part of sustainable farming systems

can bring environmental benefits, the no-till method as used with GM crops has resulted in environmental destruction. A report comparing the negative environmental impacts (Environmental Impact Quotient or EIQ) of cultivating GM soy and non-GM soy found that the impact of GM soy with no-till is higher because of the herbicides applied. Also, the adoption of no-till raises the EIQ, whether the soy is GM or non-GM, again because of the herbicides used. The main reason for the massive increase in herbicides in no-till systems is the spread of glyphosate-resistant superweeds.⁶⁸

RTRS's acceptance of GM soy will result in large increases in the areas farmed by the no-till method and the inevitable spread of glyphosate-resistant superweeds.

Industrial soy production with no-till is not climate-friendly

Carbon trading is a system that aims to tackle climate change by allowing industrialized countries and companies in the Global North to continue to emit the same amount of greenhouse gases and still meet their required emissions reductions by funding projects that claim to sequester (store) carbon. Most of these carbon-storing projects are in developing countries in the Global South. Carbon trading enables emissions to continue as long as the same amount of emissions are sequestered elsewhere.

Along with GM giant Monsanto, RTRS has been lobbying to gain carbon credits for industrial soy grown in no-till systems.^{69 70} Ploughing soil releases the greenhouse gas carbon dioxide (CO₂) into the atmosphere, contributing to climate change. Monsanto argues that no-till as used with RR crops should be eligible for carbon credits because it locks CO₂ in the soil.⁷¹

However, this argument is not supported by scientific evidence. A comprehensive review of the scientific literature found that no-till fields lock no more carbon in the soil than ploughed fields when soil depths greater than 30 cm are taken into account.⁷²

In addition, RTRS argues that no-till soy should qualify for carbon credits on the grounds of reduced input use.⁷³ But data from Argentina comparing the energy used in growing GM RR soy with that used in growing non-GM soy show that, while no-till reduces farm operations (tractor passes across the field), the production of GM RR soy requires more energy than the production of non-GM soy – in both no-till and tillage systems. This is due to a higher consumption of energy for the production of the herbicides used on GM RR soy.⁷⁴

Another ground on which the RTRS may claim climate benefits for RTRS soy is “reduced deforestation”. The carbon credits would be claimed through the UN REDD+ (Reduced Emissions from Deforestation and Degradation) project.⁷⁵

If Monsanto and RTRS succeed in their lobbying and farmers that grow Roundup Ready crops can access carbon credits for no-till and reduced deforestation, this will result in a massive expansion of GM RR soy, as governments will encourage farmers to plant the crop. The outcome will be an increase in climate-damaging high-input farming.

RTRS's biofuels ambitions are environmentally destructive

In the EU, the RTRS is lobbying to gain accreditation for “responsible” soy production for biofuels, under the EU Renewable Energy Directive (RED).^{76 77} The RED sets a binding target of 10% energy from biofuels in transport by 2020. The target has come under increasing criticism

as evidence has grown that biofuels are not sustainable.^{78 79}

The lucrative biofuels market is important to the financial viability of the RTRS. In order to obtain recognition from the European Commission for the RED, the RTRS has adopted a special “RED add-on” to its criteria.⁸⁰

The RTRS RED add-on criterion will encourage the clearance of forest and other valuable ecosystems for environmentally destructive biofuels production to fuel Europe’s cars.

Conclusion

GM and intensively produced soy is not “responsible” and the RTRS criteria are too weak to make it so. Consumers are currently prevented from seeing the damage done by intensively produced soy, as it happens far from their homes. But as consumers become better informed, any supermarket that participates in the RTRS or buys RTRS-certified soy risks a backlash from its customers.

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