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São Paulo, July 8, 2021

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Dear Governors,

We are writing to applaud the commitment the Governors, through the Interstate Legal Amazon Consortium, have made to fight illegal deforestation in the Amazon and to share our recommendations regarding the urgent, short-term steps that we believe your states should take to meet it. Human Rights Watch strongly supports your efforts to seek international cooperation to address the Amazon crisis. And we have advocated for international assistance to be provided directly to those state governments that are able to demonstrate progress—

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measured in concrete results—in reducing deforestation and ending impunity for environmental crimes and acts of intimidation and violence against forest defenders within their jurisdictions.

Human Rights Watch is an international nongovernmental organization that monitors and reports on human rights issues in more than 100 countries around the world—including, among others, those associated with environmental degradation and climate change, abusive and unsustainable business practices, and infringements on the rights of Indigenous peoples. We have staff in 40 countries, including offices in Washington, DC; New York; Berlin; Paris; and São Paulo.

Human Rights Watch has done extensive reporting on the environmental and human rights crisis in the Brazilian Amazon. In 2019, we published a [report](#) documenting a systematic failure by authorities to properly investigate and prosecute acts of violence linked to illegal deforestation. In 2020, in partnership with the Amazon Environmental Research Institute (IPAM) and the Institute for Health Policy Studies (IEPS), we produced a [report](#) documenting how deforestation-related fires had poisoned the air breathed by millions of Brazilians and led to thousands of hospitalizations for respiratory diseases. We have also documented the failure of federal agencies to enforce penalties for [environmental infractions](#) and curb [illegal mining](#) and [violence](#) in Indigenous territories.

Since 2019, Human Rights Watch has [reported](#) on how the federal government has sabotaged the country’s environmental law enforcement agencies, harassed and sought to marginalize civil society organizations, and weakened the protection of Indigenous territories. While illegal deforestation and associated violence are longstanding problems in the Brazilian Amazon, the situation has grown [dramatically worse](#) under the current government, whose anti-environmental rhetoric and policies have effectively given a green light to the criminal networks that are driving much of the illegal logging, mining, and land invasions.

The mounting destruction of the rainforest has tarnished Brazil’s image and competitiveness abroad. The European Union has [indicated](#) the Amazon crisis is a major factor in the delay in the ratification of the association agreement with Mercosur, for example. Failure to address the crisis has also [hindered](#) the country’s aspirations to become a member of the Organization for Economic Cooperation and Development, and [investment funds](#) and [supermarkets](#) have threatened to boycott Brazilian agricultural commodities linked to deforestation.

Given the federal government’s record, and given the crucial role that state-level agencies play in fighting illegal deforestation and protecting the rights of local populations,

Human Rights Watch has [urged](#) the US government to engage with the Consortium in the design and implementation of assistance programs to the Brazilian Amazon, and to offer assistance directly to the states to support your efforts to address the crisis.

In April, the United States, the United Kingdom and Norway along with major businesses [launched](#) the Lowering Emissions by Accelerating Forest finance (LEAF) Coalition. The coalition is pledging at least US\$1 billion to pay jurisdictions, including subnational governments such as the Amazon states, that can demonstrate they are reducing greenhouse gas emissions from tropical deforestation and forest degradation, which effectively requires them to reduce deforestation rates.

To be eligible for funding, the Coalition says, jurisdictions must [ensure](#) the “full and effective” participation of Indigenous peoples and local communities and [uphold](#) land tenure rights in their deforestation reduction projects. It our understanding that, after [welcoming](#) the initiative, some Amazon states have taken steps towards [submitting](#) applications.

Citing [Human Rights Watch research](#), in April 15 US senators—including the chairs of Senate committees that play a major role in shaping foreign policy—made clear in a [letter](#) to President Joe Biden that any such assistance should be conditioned on Brazilian authorities making significant and sustained progress on reducing deforestation and ending impunity for environmental crimes and acts of intimidations and violence against forest defenders. Subsequently, US Special Presidential Envoy for Climate Change John Kerry and US Secretary of State Antony Blinken have [echoed the call](#) for results.

It seems increasingly clear that states will have to address human rights issues in conjunction with efforts to reduce deforestation to be eligible for funding, and they will have to demonstrate concrete progress.

We are encouraged that the Consortium is [seeking](#) to build alliances with the international community to support conservation and sustainable development that benefits the millions of Brazilians residing in the Amazon. We welcome the [progress](#) made in several states in curbing deforestation, and the [initiative](#) that some state governments have taken to seek to increase the sustainability of agricultural commodities produced in the Amazon. We also consider crucial that some states have developed and maintained their own [programs](#) for the protection of environmental and human rights defenders at risk.

Yet much remains to be done. According to the National Space Research Agency (INPE) PRODES monitoring system, in 2020 more than 11,000 square kilometers of rainforest

were lost, nearly triple the 3,925 square kilometers target that Brazil committed itself to reaching by 2020 as part of its National Climate Change Policy. The most recent preliminary estimates by INPE's DETER monitoring system [indicate](#) that between January and May 2021 roughly 2550 square kilometers were deforested, a 25 per cent increase in relation to the same period last year. Recent, serious acts of violence and threats against Indigenous forest defenders in the [Tapajós basin](#) and the [Yanomami Indigenous lands](#), even in the face of law enforcement operations against illegal mining, also show the extent to which criminal groups driving the destruction of the Amazon feel emboldened—and the work that authorities must do to counter this prevailing sense of impunity.

Human Rights Watch has identified a range of urgent policy measures that we believe your states will need to adopt to reverse the trend of accelerated deforestation and impunity for environmental crime within your respective jurisdictions. These measures are also conceived with the understanding that state governments are operating with limited resources that have been strained by the Covid-19 pandemic, and thus consist largely of political decisions that could be executed at your discretion with existing or moderate resources. These measures include the following:

- Make Animal Transit Guides (GTA) public to increase transparency of the cattle supply chain and curb invasions of Indigenous territories and protected areas;
- Annul registries of private properties that illegally claim ownership of land within Indigenous territories and public forests; and
- Instruct state police to respond promptly to acts of violence and intimidation linked to illegal deforestation and other environmental crimes, and ensure that these crimes are thoroughly investigated.

We also urge the Consortium to convene the relevant authorities within their states—including civil and military police, public prosecutors' offices and environmental agencies—to develop a coordinated strategy for dismantling criminal networks linked to illegal deforestation and violence against defenders in their jurisdiction. In addition, states should strengthen or create programs for the protection of human rights defenders at risk, ensuring adequate representation of Indigenous peoples and civil society in their governance structure.

We explain each of these recommendations in detail in the annex we are attaching to this letter, which we will also be sharing with the prospective donor countries that we hope might support your efforts. We strongly believe that by implementing these measures in an urgent and rigorous fashion, your states will be able demonstrate leadership on this

crucial issue and deliver the kind of results that will be necessary to garner international support for your efforts.

We look forward to continued engagement with the Consortium.

Sincerely,

Maria Laura Canineu
Brazil Director
Human Rights Watch

Daniel Wilkinson
Environment Director
Human Rights Watch

Human Rights Watch recommendations to the Consortium of Amazon Governors for immediate measures to address the environmental and human rights crisis in the Brazilian Amazon

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The following measures can be implemented unilaterally by the governments of each state. They are essential steps that Human Rights Watch views as necessary to generate concrete results—both in the short and long term—in protecting the rainforest, reducing violence, and dismantling the criminal networks driving illegal deforestation in the Amazon.

I. Investigate Crimes Targeting Forest Defenders

The destruction of the Brazilian Amazon is driven largely by criminal networks that engage in acts of violence and intimidation against those who stand in the way of their illicit enterprises— such as illegal logging, mining, or cattle ranching—attacking environmental agents, Indigenous leaders, and local residents who seek to protect the forest.

Between 2009 and 2019, more than 300 people have been killed in the context of conflicts over the use of land and resources in the Amazon—many of them by people involved in illegal deforestation—according to the Pastoral Land Commission (CPT). In a 2019 report, Human Rights Watch examined 28 such killings—as well as four attempted killings and more than 40 cases of death threats—in Maranhão, Mato Grosso, Pará, and Rondônia. We obtained credible evidence that the perpetrators were engaged in illegal deforestation and the victims were targeted because they stood in the way of their criminal enterprise. Some of these victims were environmental enforcement officials. Most were members of Indigenous communities or other forest residents who denounced illegal logging to authorities or sought in other ways to contribute to Brazil’s efforts to enforce its environmental laws.¹

Perpetrators of violence in the Brazilian Amazon are rarely brought to justice. Of the more than 300 killings that the Pastoral Land Commission has registered since 2009, alleged perpetrators had been brought to trial in only 14 in 2019. Of the 28 killings documented in our 2019 report, only two cases had gone to trial. And of the more than 40

¹ Human Rights Watch, “Rainforest Mafias: How Violence and Impunity Fuel Deforestation in Brazil’s Amazon”, September 2019, <https://www.hrw.org/report/2019/09/17/rainforest-mafias/how-violence-and-impunity-fuel-deforestation-brazils-amazon>.

cases of attacks or threats, none had gone to trial—and criminal charges had been filed in only one case.²

This lack of accountability is largely due to the failure by police to conduct proper investigations of the crimes, according to federal and state prosecutors and environmental officials. As long as this impunity remains the norm, the violence and deforestation in the Amazon will likely continue unchecked. States have a key role to play and can contribute significantly by providing protection for forest defenders and investigating killings and threats against them.

- **Governors should instruct state police to respond promptly to reports of violence and threats linked to illegal deforestation and other environmental crimes to ensure that crimes targeting forest defenders are thoroughly investigated.**
- **Governors should convene the relevant law enforcement authorities within their states (including prosecutors, police, and environmental agents) to develop plans of action—with meaningful input from Indigenous and civil society representatives—to investigate and dismantle the criminal networks linked to illegal deforestation and other environmental crimes within their jurisdictions.**
- **Governors should instruct military police to support operations by federal and state environmental agencies, in order to protect environmental agents from retaliation by criminal networks involved in illegal logging and other illegal enterprises.**

II. Annul Illegal Land Claims

The Rural Environmental Registry (CAR) was created to provide an overview of environmental assets within private properties. In the CAR, landowners must register the location and boundaries of their property and indicate the areas within them used for production or set aside for conservation. It is then the responsibility of state environmental agencies to conduct compliance analyses and validate or annul the entries, including annulling CAR registries that improperly claim Indigenous or public lands as private property.³ Yet, at the end of 2019, only seven percent of CAR entries in the Amazon and Cerrado regions had been assessed by state environmental authorities.⁴

² *Ibid.*

³ Note the CAR is self-declaratory; see Azevedo, A.A., Rajão, R., Costa, M.A., Stabile, M.C.C., Macedo, M.N., Reis, T.N.P., Alencar, A., Soares-Filho, B.S., Pacheco, R., 2017. Limits of Brazil's Forest code as a means to end illegal deforestation. PNAS 114, 7653–7658, <https://doi.org/10.1073/pnas.1604768114>

⁴ The study assessed the states in the Amazon region and the 'Matopiba' area of the Cerrado; see Observatório do Código Florestal, ICV, "Caminhos para a Validação do CAR pelos Estados da Amazônia e do Cerrado," January 2020, <https://www.icv.org.br/2020/01/saiba-como-esta-a-validacao-do-car-na-amazonia-e-no-matopiba/> (accessed June 2, 2021).

The lack of assessment of CAR registrations is routinely exploited by those that seek to illegally seize land, by falsely registering public lands as private properties.⁵ While the CAR registrations do not in fact confer legal ownership of the lands, they are nonetheless used to obtain financing that enables illegal occupation and deforestation.⁶ Many of the unvalidated CAR registrations illegally overlap with public forests that have not yet been allocated to any specific use under Brazil's land categorization system, known as undesignated public forests (UPF). UPFs within the Brazilian Amazon cumulatively cover an area larger than the country of Spain. Fifty-six percent of this land is under states' jurisdiction, and the remainder is under federal jurisdiction.⁷ Between 2016 and 2020, the area of UPFs illegally claimed as private properties through fraudulent CAR registries more than doubled, from 8 to 18.6 million hectares, according to an analysis of official data by the Amazon Environmental Research Institute (IPAM).⁸ In 2020, nearly a third of the land within UPFs within the Amazon were illegally registered as private properties in the CAR. Thirty-two percent of all deforestation registered in the rainforest that year occurred in UPFs.⁹

Indigenous lands have also become increasingly vulnerable to illegal encroachment. Between 2016 and 2020, the area illegally registered as private property in Indigenous lands increased by 55 percent, up to 3.57 million hectares.¹⁰ Properties larger than 1,000 hectares made up 88 percent of the areas improperly claimed as private property inside Indigenous lands, signaling the trend was driven by powerful criminal networks rather than small scale farmers.¹¹ Of all deforestation in Indigenous lands in 2019, 41 percent took place in areas where land had been illegally claimed as private property in the CAR register.¹²

While most deforestation and fires that take place in UPFs occurs in UPFs under federal jurisdiction, state governments are responsible for validating or annulling *all* CAR

⁵ Azevedo, A.A., Rajão, R., Costa, M.A., Stabile, M.C.C., Macedo, M.N., Reis, T.N.P., Alencar, A., Soares-Filho, B.S., Pacheco, R., 2017. Limits of Brazil's Forest code as a means to end illegal deforestation. *PNAS* 114, 7653–7658.

<https://doi.org/10.1073/pnas.1604768114> ; Brito, B., Barreto, P., Brandão, A., Baima, S., Gomes, P.H., 2019. Stimulus for land grabbing and deforestation in the Brazilian Amazon. *Environ. Res. Lett.* 14, 064018. <https://iopscience.iop.org/article/10.1088/1748-9326/ab1e24>

⁶ A. Alencar et al, "Technical Report No. 7: Amazon on Fire – Deforestation and Fire in Undesignated Public Forests," Amazon Environmental Research Institute (IPAM), April 2021, p. 10, <https://ipam.org.br/wp-content/uploads/2021/04/Amazon-on-Fire-7-en.pdf> (last accessed June 3, 2021). Clearing forest in the Amazon is an onerous task requiring heavy machinery and costing between R\$ 800 and 2,000 per hectare, according to the Federal Prosecutor's Office. Giovana Girardi, "Investigações revelam quadrilhas e ganho milionário por trás do desmate", *Estadão*, August 31, 2019, <https://sustentabilidade.estadao.com.br/noticias/geral/investigacoes-revelam-quadrilhas-e-ganho-milionario-por-tras-do-desmate,70002990544> (last accessed June 3, 2021).

⁷ A. Alencar et al, "Technical Report No. 7: Amazon on Fire – Deforestation and Fire in Undesignated Public Forests," Amazon Environmental Research Institute (IPAM), April 2021, p. 3, <https://ipam.org.br/wp-content/uploads/2021/04/Amazon-on-Fire-7-en.pdf> (last accessed June 3, 2021).

⁸ *Ibid.*, p. 7.

⁹ *Ibid.*, p. 4.

¹⁰ M. Fellows et al, "Technical Report No. 6: Amazon on Fire – Deforestation and Fire in Indigenous Lands," Amazon Environmental Research Institute (IPAM), March 2021, p. 7, <https://ipam.org.br/bibliotecas/amazon-on-fire-6-deforestation--and-fire-in-indigenous-lands/> (last accessed June 3, 2021).

¹¹ *Ibid.*

¹² *Ibid.*, p. 9.

registries within their state’s boundaries.¹³ Annuling CAR registries that improperly claim ownership of land within public forests would make it more difficult for land grabbers to obtain the necessary funding to secure machinery and labor to cut down the forest. States can adopt the same measure to protect Indigenous territories, which are also under federal jurisdiction.

- **Governors should instruct the relevant agencies in their states to produce time-bound plans for reviewing the CAR registrations within their jurisdictions and annulling those that illegally overlap with UPFs or Indigenous lands (including areas that are in the process of being demarcated as Indigenous territories).**

III. Publish GTA Databases

Brazil’s greenhouse gas emissions are driven largely by changes in land use, including the clearing of forested lands for cattle ranching.¹⁴ More than 60 percent of forest clearing in the Amazon is linked to cattle ranching.¹⁵ In addition to environmental impacts, cattle ranching has been repeatedly linked to human rights abuses, including labor rights abuses, conflicts over land and resources, violence against forest defenders, among other violations, Human Rights Watch and other organizations have shown.¹⁶

The Animal Transport Guide (GTA) could play a crucial role in efforts to reduce illegal deforestation in the Amazon. This mandatory transportation license issued by state

¹³ One possible explanation for this trend is that over a quarter of UPFs under federal jurisdiction are located nearby large roads or highways, thereby rendering them more accessible to trespassers; see A. Alencar et al, “Technical Report No. 7: Amazon on Fire – Deforestation and Fire in Undesignated Public Forests,” Amazon Environmental Research Institute (IPAM), April 2021, p.3, <https://ipam.org.br/wp-content/uploads/2021/04/Amazon-on-Fire-7-en.pdf> (last accessed June 3, 2021).

¹⁴ Albuquerque, I. et al., “Análise das emissões brasileiras de gases de efeito estufa e suas implicações para as metas do clima do Brasil 1970-2019,” SEEG 8, 2020, https://seeg-br.s3.amazonaws.com/Documentos%20Analiticos/SEEG_8/SEEG8_DOC_ANALITICO_SINTESE_1990-2019.pdf, p. 5 (accessed June 1, 2021).

¹⁵ A study by INPE and the Brazilian Company for Agricultural Research (EMBRAPA), a government-owned company, showed 62 percent of the deforested areas in the Amazon region in 2014 were turned into grass for cattle ranching. Only 6 percent of deforested areas were dedicated to crops, and 0.2 percent to mining. The rest was covered by secondary vegetation. Similar percentages were registered in years prior to 2014. No updated data is available. “TerraClass 2004 a 2014. Dinâmica na cobertura e no uso da terra no período de 10 anos nas áreas deflorestadas da Amazônia Legal Brasileira,” TerraClass Project Powerpoint presentation, May 5, 2016, copy on file at Human Rights Watch. For a description of TerraClass Project, see its website: <https://www.terraclass.gov.br/> (accessed August 8, 2019).

¹⁶ See for example: Human Rights Watch, “Rainforest Mafias,” <https://www.hrw.org/report/2019/09/17/rainforest-mafias/how-violence-and-impunity-fuel-deforestation-brazils-amazon>, September 2019, <https://www.hrw.org/report/2019/09/17/rainforest-mafias/how-violence-and-impunity-fuel-deforestation-brazils-amazon> (accessed June 1, 2021); Amnesty International, “From Forest to Farmland,” July 15, 2020, <https://www.amnesty.org/download/Documents/AMR1926572020ENGLISH.PDF>; (accessed June 1, 2021); Repórter Brasil, “Trabalho escravo na indústria da carne,” Monitor 8, January 2021, https://reporterbrasil.org.br/wp-content/uploads/2020/12/Monitor-8_Trabalho-escravo-na-industria-da-carne.pdf (accessed June 1, 2021); and Comissão Pastoral da Terra, “Conflitos no Campo 2020,” May 2021, <https://www.cptnacional.org.br/downlods?task=download.send&id=14242&catid=41&m=0> (accessed June 1, 2021)

agriculture secretariats contains information on the origin and destination of cattle lots. By cross-referencing GTA records with the Rural Environmental Registry (CAR) and deforestation monitoring systems of the National Space Research Agency (INPE), environmental enforcement agencies could detect and remove cattle herds that are being illegally grazed in protected areas or undesignated public forests, as well to identify the owners of these herds and hold them accountable. Public access to GTA records could also help downstream companies—as well as investors, civil society groups, and consumers—trace and monitor cattle supply chains.¹⁷

Yet state authorities have generally refused to make GTA records available to the public.¹⁸ And they have repeatedly denied—fully or partially—requests from environmental agents and prosecutors to access them, thus hindering efforts to investigate and identify wrongdoers, and to remove livestock from protected areas.¹⁹

Moreover, some state agricultural agencies have issued GTAs allowing ranchers to move cattle to or from protected areas or areas that have been placed under “embargo” by environmental authorities and where economic activity is prohibited, thereby enabling their environmental crimes.²⁰

- **Governors should instruct their state agriculture secretariats to make their GTA databases accessible to environmental agencies, prosecutors’ offices, and the general public.**
- **Governors should instruct their state agriculture secretariats to incorporate into the GTAs the code associated to the CAR registry to facilitate law enforcement and environmental authorities cross-referencing and validating information on the location and legality of cattle herds.**
- **Governors should instruct their state agriculture secretariats not to issue GTAs for cattle moving to or from embargoed or protected areas by inspecting cattle lots’ origin and destination.**

¹⁷ Other relevant technologies for tracking cattle from birth to slaughter would be complementary and should be explored, such as individual animal identification through ear tagging, chips or other methods of electronic identification. N. Hofmeister, F. Wenzel, and P. Papini, “Satellites, maps and the flow of cattle: Brazilian solutions for reducing deforestation are already in use,” November 12, 2020, <https://news.mongabay.com/2020/11/satellites-maps-and-the-flow-of-cattle-brazilian-solutions-for-reducing-deforestation-are-already-in-use/> (accessed June 10, 2021).

¹⁸ The Federal Prosecutor’s Offices in several states have issued recommendations to authorities, calling for transparency in the GTAs. They argue, for example, that the GTA contains environmental and sanitary information of public interest which should be made publicly available to allow civil society to monitor the environmental impacts from cattle ranching. Recommendations to authorities in Pará and Mato Grosso in 2015, and Acre and Amazonas in 2018 on file with Human Rights Watch. For examples of states’ history of obstruction, see: Bernardo Camara, “Government battling government: without transit licenses, illegal cattle production in Pará goes unpunished,” O Eco, November 7, 2017, <https://www.oeco.org.br/english/government-battling-government-without-transit-licenses-illegal-cattle-production-in-para-goes-unpunished/>

¹⁹ *Ibid.*

²⁰ See for example: Amnesty International, “From Forest to Farmland,” July 15, 2020, <https://www.amnesty.org/download/Documents/AMR1926572020ENGLISH.PDF>; (accessed June 1, 2021).