

Barclays and JBS: A Long-term Relationship

Financial Conduct Authority Complaint Briefing

29th October 2025

Mighty Earth has filed a formal complaint with the UK's Financial Conduct Authority (FCA) calling on the regulator to investigate potential financial fraud and greenwashing by Barclays in underwriting \$3 billion of Sustainability-Linked Bonds (SLBs) issued by meat giant JBS.

SLBs are a type of loan or debt instrument which are based on the borrower's – in this case JBS' – achievement to meet pre-determined environmental, social or governance (ESG) targets, called Sustainable Performance Targets (SPTs). SLBs aim to encourage improved ESG outcomes of the borrower.

However, SLBs can be misused in two key ways. Firstly, the issuer, can profit from the lower interest rates attached to SLBs due to their sustainability credentials. In the case of JBS, they have secured financing from Barclays on these SLBs without a published transition plan that shows how the 'sustainability' aspect of these bonds will be delivered. Secondly, both the issuer and financier benefit from positioning themselves as 'green' through such a deal, when in reality these bonds were underpinned by bogus, fraudulent sustainability claims from JBS.

Barclays and JBS: A Long-term Relationship

- Barclays Bank PLC is an FCA regulated entity, and a multinational bank of influence.
- JBS is a powerful Brazilian multinational food corporation under unified control with a diabolical reputation over the last decade for high-level financial, environmental criminality, money laundering, and a flagrant disregard for its impact on climate and human rights. See the full timeline of criminality and environmental destruction [here](#).
- Barclays is the UK's largest financier of the industrial livestock sector (\$28 billion) overall.¹ As the largest global financier of JBS from 2015-2022, Barclays maintained advanced insight into the severity and quality of the risks and institutional behaviour inherent within the JBS group.
- Since 2015, Barclays has provided more corporate loans, bond issuances and revolving credit facilities to JBS and its subsidiaries than any other financial institution globally. It provided approximately US\$2.75 billion in corporate loans and US\$450 million in revolving credit facilities to JBS and its subsidiaries and underwrote an estimated US\$3 billion in bond issuances for the company. Over this 8-year period, Barclays was the financier of over a quarter of identified corporate loans (25.6%) and nearly a fifth of identified bond issuances (19.5%) provided to JBS and its global subsidiaries.²

¹ 2015-2022: Feedback (now FoodRise), Bankrolling the Butchers: The role of UK finance in the industrialisation of meat and dairy farming, 2023; <https://foodrise.org.uk/wp-content/uploads/2023/11/Feedback-2023-Bankrolling-the-Butchers-report.pdf> (hereinafter [Feedback, Bankrolling the Butchers, 2023](#))

² [Feedback, Bankrolling the Butchers, 2023](#)

Barclays and JBS: Fraudulent Bonds

- In 2021, Barclays acted as a leading facilitator – or *underwriter* – as JBS launched one of the world’s largest ever portfolio of Sustainably Linked Bonds (SLBs).
- Forming part of a public campaign which began in March 2021, this issuance sought to reset JBS as a global leader in ESG. JBS was assessed to have issued the ninth largest value SLBs (\$3 billion) and the joint fourth by volume (five), by end of 2023.³
- However, the Sustainability Performance Target (SPT) linked to the SLBs was not only negligible in their “sustainability” but, more seriously, falsely claimed to be integral to a “net zero by 2040” commitment.
- Despite JBS’ 2040 net zero commitment forming the basis of their ESG claims of the SLBs, the company failed to outline a target for its Scope 3 emissions. These emissions amount to 97% of JBS’ emissions.⁴
- Further, the SPT did not commit to a *material* reduction in the corporate chain, as shown by independent experts from the Institutional Shareholder Services⁵ and Anthropocene Fixed Income Institute⁶, who highlighted the SPT could not properly merit favourable rates at the size and scale offered by Barclays.
- Nevertheless, Barclays acted as lead and co-underwriter for the entire US\$3 billion SLBs issued by JBS in 2021, underlining the relative significance of its own profile in the global SLB market as underwriter.⁷
- For JBS, the SLBs presented the opportunity for increased volume of financial investment on more favourable terms. JBS claims that its SLBs were oversubscribed and effecting historically low levels of repayment.⁸
- It has been estimated that issuing \$1 billion in SLBs under the framework would result in \$26 million in interest cost savings for JBS. The same analysis found “insignificant financial penalties were set, if JBS fails to meet its goals”.⁹
- To this end, JBS could benefit from falsely presenting or reinventing its sustainability credentials to investors.
- In the six years that preceded the end of 2023, Barclays made more profit from loans, revolving credit, and underwriting provided to JBS than any other bank: an estimated US\$1.7 billion.¹⁰

³ Climate Bonds Initiative 2024 report: Sustainability Linked Bonds: Building a High-Quality Market, p.7;
<https://www.climatebonds.net/data-insights/publications/sustainability-linked-bonds-building-high-quality-market-2>

⁴ <https://www.iatp.org/media-brief-jbs-increases-emissions-51-percent>

⁵ ISS SPO Sustainability-Linked Securities JBS, June 2021

⁶ https://anthropocenefii.org/downloads/AFII_JBS-A-meaty-SLB-impact-proposal.pdf

⁷ Information produced by Profundo from databases including Bloomberg and Refinitiv confirm these details and can be provided on request.

⁸ Bloomberg, Meat Giant JBS Says Investor Demand for Its Bonds Undercuts ESG Concerns, 26 June 2025;
<https://www.bloomberg.com/news/articles/2025-06-26/jbs-says-investor-demand-for-its-bonds-undercuts-esg-concerns>

⁹ Anthropocene Fixed Income Institute, JBS: A meaty SLB impact proposal, 16 August 2022;
https://anthropocenefii.org/downloads/AFII_JBS-A-meaty-SLB-impact-proposal.pdf

¹⁰ Global Witness, Barclays earned \$1.7 billion financing company tied to Indigenous land destruction in Amazon, 26 September 2024; <https://globalwitness.org/en/campaigns/forests/barclays-earned-1-7bn-from-company-tied-to-indigenous-land-invasion/>

- For Barclays, this represented a continuing opportunity to gain profit from financing a lucrative global entity whilst purporting to accelerate its own sustainability credentials and meeting its sustainable finance targets four years early.¹¹
- Barclays appear to have been knowingly complicit in a multi-billion-dollar sustainable finance fraud, given it was aware of the serious criminal human and environmental violations enacted by JBS both before and during Barclays underwriting of the SLBs.

Barclays and the FCA: Financial Fraud and Greenwashing Red Flags

- Even the most basic due diligence appraisals within Barclays would and should have raised significant concerns as to the fundamentally misleading and fraudulent character of the JBS SLBs issued in 2021, given JBS' documented criminal practices.
- At the time of the underwriting, Barclays publicly stated they adhered to the Sustainability-Linked Bond Principles, voluntary guidance issued by the International Capital Markets Association, which states: "Sustainability-Linked Bonds incentivise the issuer's achievement of material, quantitative, pre-determined, ambitious, regularly monitored and externally verified sustainability (ESG) objectives."¹²
- Based on the FCA's own guidance, serious questions and concerns are raised as to the criminality, integrity and competency of Barclays' role of underwriting JBS' SLBs.
- Wider systemic concerns exist as to the integrity of Barclays' market conduct, which are reinforced by the FCA penalty of £39.3 million imposed upon Barclays in July 2025 under section 206 of the Financial Services and Markets Act 2006.¹³
- Our complaint outlines multiple risks to the reputation and confidence in UK financial markets posed by Barclays' role and ongoing participation in the JBS issued SLBs and broader ongoing relationship with JBS and profits linked with major corporate criminality. This includes risks to the reputation and confidence in UK financial markets posed by Barclays' lack of integrity of its own sustainability values and policies, as well as risks to the UK sustainable finance and SLB market.

Recommendations to the FCA

We believe our complaint raises reasonable grounds to assert that Barclays has facilitated and engaged in serious violations of the FCA regulatory principles.

We invite the FCA to:

1. Investigate fully the criminality of JBS including allegation of fraud and potential proceeds of crime into the UK market.
2. Rule publicly within six months that the Net Zero banner of JBS is fraudulent and the bonds subsequently cannot be categorised under the banner of SLBs.
3. Sanction Barclays to significantly improve their enhanced due diligence process.

¹¹ [Barclays PLC Climate-related Financial Disclosures 2021](#)

¹² <https://www.icmagroup.org/assets/documents/Regulatory/Green-Bonds/June-2020/Sustainability-Linked-Bond-Principles-June-2020-171120.pdf>

¹³ FCA, Final Notice to Barclays Bank Plc, 14 July 2025; <https://www.fca.org.uk/publication/final-notice/barclays-bank-plc-2025.pdf>

4. Remove JBS SLBs from Barclays green finance portfolio.

Recommendations to Barclays

1. Commit to no new funding of JBS Group (including all subsidiaries).
2. Update the Forestry & Agriculture Statement in line with Mighty Earth recommendations to properly deliver on intentions and commitments, which includes clients delivering (not only committing to) zero deforestation and conversion by 2025, widening the scope of the commodities – including all forms of deforestation – and applicability across all global operations of its clients.
3. Introduce new policies on financing for the meat and dairy sector, resulting in no new funding of expansion projects which see GHG emissions increase.
4. Enact a policy to ensure Barclays retroactively adjust how SLBs are accounted for in climate financing targets when the SLB issuer fails to meet the agreed SPT.

Recommendations to Government

To ensure the UK's integrity as a global hub for sustainable finance, the UK Government must:

1. Require UK financial institutions to ensure bond issuers have adhered to the ICMA Sustainability-Linked Bond Principles before underwriting or financing SLBs.
2. Empower the FCA with greater oversight of the Sustainability-Linked Bond (SLB) market and increase the specificity and ambition of the guidance.
3. Integrate public reporting on climate and nature fully into the planned UK Sustainability Reporting Standards, including mandatory disclosure of Scope 3 emissions arising from the agricultural sector and reporting on deforestation-related risk from the meat and dairy sector.
4. Require that UK financial institutions are within the scope of the UK Forest Risk Commodity Regulation within the secondary regulations to be introduced as part of Schedule 17 of the Environment Act.