



Bonsucro Certification Protocol Additional Requirements

2 July 2018

General

The Bonsucro Board has revised the Bonsucro Certification System to allow the certification of farms on their own independently of a mill, as well as mills independently of farms. The aim of this document is to provide the process requirements for the certification of farms and mills separately against the applicable Bonsucro Standards including the recently released Production Standard for Smallholder Farmers.

Certification may now be granted against the following applicable Standard(s):

1. Bonsucro Production Standard for Smallholder Farmers v.1
2. Agricultural Indicators only of the Bonsucro Production Standard v.4.2
3. Milling & Processing Indicators only of the Bonsucro Production Standard v.4.2

Additional Requirements

The following clauses shall be considered additional to Part B of the Bonsucro Certification Protocol v.51:

1 Scope

- 1.3 Certification against the agricultural indicators only of the Bonsucro Production Standard, the processing and milling indicators only of the Bonsucro Production Standard, and the Bonsucro Production Standard for Smallholder Farmers shall be assessed in accordance with the additional requirements set out in this document.
- 1.4 Certification against the Bonsucro Production Standard for Smallholder Farmers does not require certification against Bonsucro's Mass Balance Chain of Custody Standard. Certification against the Bonsucro Agricultural Indicators of the Production Standard does not also require certification against Bonsucro's Mass Balance Chain of Custody Standard but clause 8.6.4 below shall apply. Certification against the Bonsucro Processing & Milling indicators of the Production Standards also require certification against Bonsucro's Mass Balance Chain of Custody Standard.
- 1.5 The following clauses of the Bonsucro Certification Protocol with their application to either farms only or mill only shall apply: Part B: Certification Process Requirements of the Production Standard clauses 5, 6, 7, 8.1, 8.2.2, 8.3.3, 8.3.4, 9, 10,11,12,13.

1.6 The Bonsucro Production Standard for Smallholder Farmers cannot be used to produce Bonsucro EU RED compliant material. The Bonsucro Production Standard must be used.

4.4 Unit of certification

4.4.6 The scope of certification against the Production Standard for Smallholder Farmers shall be defined in accordance with table 1:

Table 1: Production Standard for Smallholder Farmers

Applicable Standard(s)	Unit of Certification	Sugarcane-derived products	Activity	Additional Sites
Production Standard for Smallholder Farmers	✓	✓	✓	N/A
	Group of smallholder farmers with less than 25 hectares of land	Sugarcane & by-products	All relevant activities on smallholder farmers sites	

4.4.7 If the smallholder farmers are certified with a mill, the CB shall also audit the mill and verify that it complies with the relevant clauses of the Bonsucro Production Standard and the Mass Balance Chain of Custody Standard.

4.4.8 When smallholder farmers are organised as an association or similar and when the association acts as the Group Manager, the composition of the Group can be all the smallholder farmers of the association or a sub-group of the association. The Group shall be assessed in accordance with clause 8.6 of this Directive.

4.4.9 The scope of certification against the Agricultural Indicators of the Production Standard only shall be defined in accordance with table 2:

Table 2: Production Standard Agriculture

Applicable Standard(s)	Unit of Certification	Sugarcane-derived products	Activity	Additional Sites
Agricultural indicators of the Production Standard	✓	✓	✓	N/A
	Single or Group of farms in geographical proximity and	Sugarcane & by-products	All relevant activities on farm sites	

	in similar jurisdiction organized into a formal Group Entity.			
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4.4.10 When farmers are organised as an association or similar and when the association acts as the Group, the composition of the Group can be all the farmers of the association or a sub-group of the association. The Group shall be assessed in accordance with clause 8.6 of this Directive.

4.4.11 If a mill’s unit of certification contains both farms and smallholders, the Production Standard can be used for all farms or the Production Standard and separately the Production Standard for Smallholder.

4.4.12 If a mill applies for certification to the Production Standard and the Production Standard for Smallholder Farmers, the CB shall mention it on the certificate and the compliance score shall be met by each group individually.

4.4.13 The scope of certification against the Processing and Milling Indicators of the Production Standard shall be defined in accordance with table 3:

Table 3: Production Standard Processing & Milling

Applicable Standard(s)	Unit of Certification	Sugarcane-derived products	Activity	Additional Sites
Processing & milling indicators only of the Production Standard & Mass Balance Chain of Custody	✓	✓	✓	✓
	Single mill	<ul style="list-style-type: none"> • Sugar • Ethanol (1G/2G) • Molasses • Other (specify) 	<ul style="list-style-type: none"> • Crushing • Production of raw sugar • Refinery/distillery (optional) 	<ul style="list-style-type: none"> • Storage (for ex. warehouse/terminal) • Other (specify)

4.4.14 The CB shall verify that the mill can demonstrate that the sources of sugarcane, sugar or biofuel originate from a Bonsucro-certified entity.

4.4.15 Certification against the Bonsucro Production Standard Processing & Milling Indicators also requires certification against Bonsucro’s Mass Balance Chain of Custody Standard. Both Standards must be met in order to be certified. A certificate shall only be issued when the mill is found compliant with both Standards.

8.3 Determining Farm Sample Size

8.3.7 The CB shall determine the minimum number of farms to be audited using Table 3. If the farms are within Category 6, Table 4 shall be used.

Table 3: Minimum Sample Size of Farms to be audited

Category	% of sugarcane in the unit of certification supplied by the farm	% of farms to be audited
1	>25%	100%
2	11 - 25%	50%
3	6 - 10%	25%
4	2 - 5%	10%
5	0.5 - 1%	5%
6	≤ 0.5% (majority small scale farms)	See table 4

Table 4: Minimum Sample Size of Farms to be audited

Total Number of Farms	Number of Farms to be audited	
	Initial and Re-certification	Surveillance
1 to 5	1	1
6 to 16	2	2
17 to 36	3	2
37 to 64	4	2
65 to 100	5	2
101 to 144	6	2
145 to 196	7	3
Over 196	Square root	Square root

8.3.8 For audits against the Production Standard for Smallholder Farmers, the sample shall be chosen at random and include farms that have and have not completed the Bonsucro Farm Diary using Table 5.

Table 5: Minimum Sample Size based on Farm Diaries completed

Year of Audit	Percentage of farms sampled that have completed the farm diary	Percentage of farms sampled that may have not completed the farm diary
Year 1 (initial audit)	20%	80%
Year 2 (surveillance 1)	40%	60%
Year 3 (surveillance 2)	60%	40%
Year 4 (re-certification audit)	80%	20%
Year 5 (surveillance 1)	100%	0%
Year 6 (surveillance 2)	100%	0%

8.6 Evaluation of Groups

- 8.6.1 The aim of a Group audit is to verify compliance of the Group Manager that establishes the management system and is responsible for farm compliance and to verify a sample of farms included in the Group. The auditor(s) shall verify that:
- a. group certification is permitted.
 - b. the client has several locations, i.e. a group of individual companies or one company with numerous sites.
 - c. the Group Manager has an up-to-date list of farms.
 - d. farms have similar processes and products. If not, stratification shall take place.
 - e. a Group Manager has been established who is responsible for internal control and individual farm compliance.
- 8.6.2 The auditor(s) shall audit the Group Manager and a sample of farms. The sample size shall be determined by using Table 3 and Table 4 if relevant. Auditors may decide which farms to audit depending on their level of confidence in the effectiveness of the Group's procedures and/or on a risk assessment. The rationale for the samples chosen shall be included in the audit report.
- a. Stratification shall take place where the group's farms can be classified into distinct sub-groups (for example for groups composed of members with up to 50ha and those with more than 50ha in size, or based on geographic location). If stratification is required, auditors shall follow the sampling procedure for each sub-group independently.
- 8.6.3 The auditor(s) shall verify that the Group Manager undertakes an internal review of the performance of each farm at least annually to assess the effectiveness of the documented procedures and the compliance of the farms against the Bonsucro Standards and that appropriate non-conformities are issued.
- 8.6.4 The auditor(s) shall verify that the Group Manager can monitor production and sales of sugarcane produced by group members including:
- a. Estimated sugarcane production per year (tonnes cane)
 - b. Total production area (hectares)
 - c. Actual sugarcane harvest in the unit of certification tracked quarterly
 - d. Total sales of certified sugarcane and list of clients
- 8.6.5 When one sampled farm within the Group is found not to be in compliance, the CB shall determine whether the issue is specific to one farm or applies systematically to the whole Group, in which case the CB may suspend all farms included in the certification.



Date of implementation

The additional clauses in this document shall apply from the date of publication.