

# Bonsucro Additional Requirements

*Bonsucro publishes Additional Requirements to the Certification Protocol (i.e. new requirements) outside the cycle of Protocol revision. Members are audited in line with Additional Requirements to the Certification Protocol.*

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## 1. Normative documents

<b>Bonsucro Certification Protocol Version 5.1 (April 20217)</b>	
Part A CBs Requirements	Section 11 Personnel Qualifications and Experience
Part B Production Standard	Section 8 Audit Section 9 Certification Decision Section 13 Certificate Section 14 Surveillance audits
Part C Mass Balance Chain of Custody Standard	Section 7 Audit Section 8 Certification Decision Section 11 Certificate Section 12 Surveillance audits

<b>European Commission Communication on EU RED remote auditing</b>	
Email communication on 26 <sup>th</sup> March 2020	
Email communication on 11 <sup>th</sup> June 2020	

## 2. Introduction

As a consequence of the COVID-19 pandemic, many governments have issued regulations establishing travel restrictions and social distancing measures, which affect the possibility of conducting the on-site audits that are required by the Bonsucro Certification Protocol. In this context, Bonsucro has consulted the Bonsucro licensed certification bodies and decided to adapt its Certification Protocol to maintain the due monitoring of Certificate holders while managing the risks arising from COVID-19 pandemic for all parties involved in the auditing and certification activities.

## 3. Definitions

**Client:** refers to the Bonsucro client of a Bonsucro licensed certification body, whether this client is a Bonsucro certificate holder or is applying for certification.

**ChoC:** refers to Bonsucro or Bonsucro EU RED Mass Balance Chain of Custody Standards as applicable to the client's scope of certification.

**Prod.:** refers to Bonsucro or Bonsucro EU RED Production Standard or Bonsucro Production Standard for Smallholder Farmers as applicable to the client's scope of certification.

## 4. Bonsucro Audits

### 4.1 Exemptions applicable to COVID-19

Bonsucro has identified a number of alternative audit protocol to mitigate the limitation due to COVID-19.

4.1.1 Certification Bodies can apply for an exemption to allow local auditors to carry out an on-site audit under the remote supervision of a qualified Bonsucro Lead auditor.

4.1.2 The options described in section 4 below (Bonsucro only audits) are to be considered by Certification Bodies if they can justify the reason why an on-site audit cannot be carried out:

- > the relevant government has established a quarantine or other measures regarding social distancing that hinder the Certification Bodies from visiting the relevant farm and/or facility (international, national or regional measures) and/or
- > the relevant government has established travel restrictions that hinder the Certification Bodies from travelling to the relevant farm and/or facility (international, national or regional measures) and/or
- > the client has not yet opened the site to external visitors (must provide written communication record from client).

4.1.3 Based on a risk analysis, it is the Certification Body's decision whether or not to consider these options for a client.

4.1.4 All exemption requests must be submitted in writing and include:

- > detailed risk analysis on the ability to collect robust evidence allowing the certification body to take a conclusion on the conformity of a client,
- > risk management / mitigation plan,
- > detailed audit plan indicating which part of the audit will be carried out remotely or onsite
- > auditor(s) name and country(ies)

## 4.2 Initial audits

Scope	Applicability of Remote Audits
ChoC	<p>4.2.1 Exemption to carry out a remote audit can be submitted for Bonsucro to consider.</p> <ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> <li>– Certificate delivered in line with the Bonsucro Certification Protocol.</li> </ul>
Prod. + ChoC	<p>4.2.2 Exemption to carry out a 2-phase audit in line with ISO 17011 requirements can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– Phase 1 Remote audit</li> <li>– Phase 2 On-site audit to take place within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase and provided the relevant level of conformity have been achieved, Certificate delivered in line with the Bonsucro Certification Protocol.</li> </ul> <p style="text-align: center;">&gt;</p> <p><b>4.2.3 Should the completion of Phase 2 within 5 months of the end of the Phase 1 audit be affected by the COVID-19 restrictions, and</b></p> <ul style="list-style-type: none"> <li>– where no Major nonconformity was raised during Phase 1 of the audit and</li> <li>– the certification Body considers the risk of non-compliance and fraud to be low,</li> </ul> <p>the Certification Body can apply for a written and justified** exemption within 4 months of the end of the Phase 1 audit to proceed as follows:</p> <ul style="list-style-type: none"> <li>– Phase 2 audit to take place remotely within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase remotely and provided the relevant level of conformity have been achieved, temporary 6-month certificate delivered, in line with the Bonsucro Certification Protocol. The Certificate shall clearly state that it is a 6-month temporary certificate pending completion of an on-site follow up audit.</li> <li>– Follow-up on-site audit and conclusion to take place before the expiry of the temporary certificate.</li> <li>– After completion of follow up audit and provided the relevant level of conformity have been achieved, 3-year certificate (same start date as temporary certificate) delivered in line with the Bonsucro Certification Protocol.</li> </ul> <p>** to be justified by the Certification Body using government guidelines</p>

### 4.3 Recertification audits

An on-site audit can be postponed, and the certificate extended by 3 months in line with the Bonsucro Certification Protocol Part B Section 15.2 and Part C Section 13.2

Scope	Applicability of Remote Audits
ChoC	<p>4.3.1 Exemption to carry out a remote audit can be submitted for Bonsucro to consider.</p> <ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> <li>– Certificate delivered in line with the Bonsucro Certification Protocol.</li> </ul>
Prod. + ChoC	<p>4.3.2 Exemption to carry out a 2-phase audit in line with ISO 17011 requirements can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– Phase 1 Remote audit</li> <li>– Phase 2 On-site audit to take place within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase and provided the relevant level of conformity have been achieved, Certificate delivered in line with the Bonsucro Certification Protocol.</li> </ul> <p><b>4.3.3 Should the completion of Phase 2 within 5 months of the end of the Phase 1 audit be affected by the COVID-19 restrictions, the Certification Body can apply for a written and justified** exemption within 4 months of the end of the Phase 1 audit to proceed as follows:</b></p> <ul style="list-style-type: none"> <li>– Phase 2 audit to take place remotely within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase remotely and provided the relevant level of conformity have been achieved, the current certificate can be extended till the date of their surveillance 1 audit (maximum 9 months from end of the Phase 2 audit)</li> <li>– After completion of surveillance 1 audit and provided the relevant level of conformity have been achieved, 3-year certificate (same start date as 9 months certificate) delivered in line with the Bonsucro Certification Protocol.</li> </ul> <p>** to be justified by the Certification Body using government guidelines</p>

### 4.4 Surveillance audits

An on-site audit can be postponed up to 15 months after the previous audit in line with the Bonsucro Certification Protocol Part B Section 14 and Part C Section 12.

Scope	Applicability of Remote Audits
ChoC	<p>4.4.1 Exemption to carry out a remote audit can be submitted for Bonsucro to consider.</p>

Scope	Applicability of Remote Audits
	<ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> </ul>
Prod. + ChoC	<p><b>4.4.2 In exceptional cases</b> where no Major nonconformity was raised at the previous audit, and the certification Body considers the risk of non-compliance and fraud to be low: Exemption to carry out a FULL remote audit can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> </ul> <p>4.4.3 If not, an exemption to carry out a 2-phase audit in line with ISO 17011 requirements can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– Phase 1 Remote audit</li> <li>– Phase 2 On-site audit to take place within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase and provided the relevant level of conformity have been achieved, certification decision communicated in line with the Bonsucro Certification Protocol.</li> </ul> <p><b>4.4.4 Should the completion of Phase 2 within 5 months of the end of the Phase 1 audit be affected by the COVID-19 restrictions</b>, the Certification Body can apply for a written and justified** exemption within 4 months of the end of the Phase 1 audit to proceed as follows:</p> <ul style="list-style-type: none"> <li>– Phase 2 audit to take place remotely within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase remotely and provided the relevant level of conformity have been achieved, certification decision communicated in line with the Bonsucro Certification Protocol.</li> <li>– Next audit to take place on-site within 9 months of the certification decision.</li> </ul> <p>** to be justified by the Certification Body using government guidelines</p>

## 5. Bonsucro EU RED Audits

### 5.1 Exemptions applicable to COVID-19

- 5.1.1 The options described in section 5 below (Bonsucro EU RED only audits) are to be considered by Certification Bodies when an on-site audit is affected by COVID-19 for audits **due to take place by the last day of the month during which travel restrictions have been lifted.**

The implications may therefore vary between different countries and regions as well as between different auditors (in case additional travel restriction applying to auditors). After that date, no exemption will be considered, and audit must be carried out as detailed in the Certification Protocol.

5.1.2 Based on a risk analysis, it is the Certification Body’s decision whether or not to consider these options for a client.

5.1.3 All exemption requests must be submitted in writing and include:

- > detailed risk analysis on the ability to collect robust evidence allowing the certification body to take a conclusion on the conformity of a client,
- > risk management / mitigation plan,
- > detailed audit plan indicating which part of the audit will be carried out remotely or onsite
- > auditor(s) name and country(ies)

## 5.2 Initial audits (EU RED)

Scope	Applicability of Remote Audits
ChoC	No exemption to carry out a remote audit will be considered.
Prod. + ChoC	All initial audits must be postponed until on-site audits can be carried out.

## 5.3 Recertification audits (EU RED)

An on-site audit can be postponed, and the certificate extended by 3 months in line with the Bonsucro Certification Protocol Part B Section 15.2 and Part C Section 13.2

Scope	Applicability of Remote Audits
ChoC	<p>5.3.1 Exemption to carry out a remote audit can be submitted for Bonsucro to consider.</p> <ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> <li>– Certificate delivered in line with the Bonsucro Certification Protocol.</li> </ul> <p>Remote audit not applicable if a new site is to be added to the certification scope.</p>
Prod. + ChoC	<p>5.3.2 Exemption to carry out a 2-phase audit in line with ISO 17011 requirements can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– Phase 1 Remote audit</li> <li>– Phase 2 On-site audit to take place within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase and provided the relevant level of conformity have been achieved, Certificate delivered in line with the Bonsucro Certification Protocol.</li> </ul>

Scope	Applicability of Remote Audits

#### 5.4 Surveillance audits (EU RED)

An on-site audit can be postponed up to 15 months after the previous audit in line with the Bonsucro Certification Protocol Part B Section 14 and Part C Section 12.

Scope	Applicability of Remote Audits
ChoC	<p>5.4.1 Exemption to carry out a remote audit can be submitted for Bonsucro to consider.</p> <ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> </ul> <p>Remote audit not applicable if a new site is to be added to the certification scope.</p>
Prod. + ChoC	<p><b>5.4.2 In exceptional cases</b> where no Major nonconformity was raised at the previous audit, and the certification Body considers the risk of non-compliance and fraud to be low: Exemption to carry out a FULL remote audit can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– The Certification Body must reserve the right to carry out an on-site follow up audit if required.</li> </ul> <p>5.4.3 If not, an exemption to carry out a 2-phase audit in line with ISO 17011 requirements can be submitted for Bonsucro to consider:</p> <ul style="list-style-type: none"> <li>– Phase 1 Remote audit</li> <li>– Phase 2 On-site audit to take place within 5 months of the end of the Phase 1 audit</li> <li>– After completion of second phase and provided the relevant level of conformity have been achieved, certification decision communicated in line with the Bonsucro Certification Protocol.</li> </ul>

## 6. Remote Verification Process

### 6.1 Bonsucro Production Standard Audits

6.1.1 Clients shall provide information to the auditors remotely in order to show conformity with all the indicators. This shall include videos and/or photos of different areas of the facilities and the different areas of the farms when applicable. The certification body retains the right to select the record and the personnel who will be interviewed.

- 6.1.2 Interviews with management and key personnel through phone or videoconference will be deemed admissible.
- 6.1.3 Interviews with direct and indirect workers through phone or videoconference will be deemed admissible, respecting the requirement that management representative shall not be present at the time of these interviews.
- 6.1.4 If Certification Bodies wish to use other alternative mechanisms for the collection of the relevant information, which are different from the ones included in this document, the Certification Bodies must include this in the exemption form.

## **6.2 Bonsucro Mass Balance Chain of Custody Standard Audits**

- 6.2.1 Clients shall provide information to the auditors remotely in order to show conformity with all the indicators. This shall include videos and/or photos of different areas of the facilities when applicable. The certification body retains the right to select the record and the personnel who will be interviewed.
- 6.2.2 Interviews with management and key personnel through phone or videoconference will be deemed admissible.
- 6.2.3 If Certification Bodies wish to use other alternative mechanisms for the collection of the relevant information, which are different from the ones included in this document, the Certification Bodies must include this in the exemption form.