## Chain of Custody Checklist

**Version 1.0 March 2018**

Adopted by:

Signature:

Date of adoption:

Statement on Company’s Commitment to Bonsucro Certification for Chain of Custody:

Please note: \*\*Outline of procedures for Chain of Custody\*\* Instructions: Please make comments in the column “Activity for Compliance” that demonstrate how the company will comply with the requirement. Or mention where you have questions and send back to your regional director/country programme manager. The template can only be used for companies that are not including Bonsucro EU compliance (export ethanol to the European Union which includes tracking of greenhouse gase emissions through the supply chain). Completing the checklist is not a guarantee of certification, but can be helpful in preparing for the audit.

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| **Indicator** | **Standard** | **Notes** | **Activity for Compliance** |
| 1.1.1 | The economic operator must identify the scope of the Mass Balance system. | Y/N | An economic operator may opt for Bonsucro Mass Balance CoC Certification or Bonsucro EU RED Mass Balance CoC Certification.  |  |
| 1.1.2 | The economic operator must define the unit of certification, including, in the case of multi-site operators, number of sites and the type of operations covered by the scope of their mass balance Bonsucro/Bonsucro EU RED Mass Balance CoC. An economic operator must implement the mass balance requirements at the level of a single site. Whenever more than one legal entity operates on a site, each legal entity is required to operate its own mass balance. | Y/N |  | Head office: Site (e.g. storage): Site (e.g. refinery):  |
| 1.1.3 | Requirements of the standard apply to all applicable activities outsourced to independent third parties (e.g. subcontracts for storage, transport or other outsourced activities).  | Y/N | Where storage is outsourced and is not located at the same geographical location, the economic operator must consider this as a separate site, and the balance of volumes in/out must be applied separately to this site.  |  |
| 1.1.4 | The economic operator must have an agreement with its sites requiring appropriate reporting and communication. | Y/N |  |  |
| 1.2.1 | The economic operator must have an appointed management representative with overall responsibility and authority for implementation and compliance with all applicable requirements of the Bonsucro/Bonsucro EU RED Mass Balance CoC standard. | Y/N | The management representative can have other roles/functions in addition to implementation of the Bonsucro/Bonsucro EU RED Mass Balance CoC Standard, including responsibility for entering and validating data in the mass balance system at one or more sites. | Point of Contact:  |
| 1.2.2 | The economic operator must establish, implement and maintain procedures covering all applicable requirements of the Bonsucro/Bonsucro EU RED Mass Balance CoC. The procedures must be according to the scale and complexity of the economic operator, covering all sites included in the scope. | Y/N |  | This procedure has been adopted by the company and is in use from XX/XX/20XX. |
| 1.2.3 | The economic operator must retain records and reports related to implementation of the Bonsucro/Bonsucro EU RED Mass Balance CoC standard, including purchase and sales documents, production records and volume summaries for at least five (5) years.  | Y/N | The records can be of the form of paper documents or can be held electronically. |  |
| 1.2.4 | The economic operator must undertake an annual internal review of performance, including the effectiveness of quality management systems and the compliance of the sites with the requirements of this Bonsucro/Bonsucro EU RED Mass Balance CoC Standard. In case of problems, the economic operator must take appropriate corrective actions. | Y/N | This is separate from the third party surveillance audit.  |  |
| 1.2.5 | The economic operator must ensure that the raw material and derived intermediary products and final biofuel are clearly identified and that no Bonsucro EU compliant material is intentionally modified or discarded to be considered as a waste or residue, including through deliberate modification of the production process. | Y/N | In the mass balance system, consignments containing sugarcane, sugar, straw, bagasse must be accounted for separately. Consignments of ethanol based on sugar, bagasse or straw must be accounted for separately. |  |
| 2.1.1 | The economic operator must check the supplier contract, invoice and supporting documentation to ensure the supplied Bonsucro/Bonsucro EU RED certified product comes from Bonsucro/Bonsucro EU RED certified suppliers, matches the accompanying documentation and includes all information required in Annex 1. | Y/N | Validation is counted from the date on the supplier invoice and/or when supporting documentation is received. This includes checking the validity of the supplier’s Bonsucro/Bonsucro EU RED Mass Balance CoC certificate. No incoming material certified under other schemes can be considered as Bonsucro/Bonsucro EU RED compliant. |  |
| 3.1.1 | Invoice and/or supporting documentation of incoming Bonsucro/Bonsucro EU RED certified product must be received and entered into the system within 30 days of physical delivery. | Y/N |  |  |
| 3.1.2 | Where applicable, the economic operator must use documented conversion rates in order to calculate the equivalent output weight or volume (at 100% sucrose or ethanol equivalents) associated with the received Bonsucro/BonsucroEU consignment. | Y/N | Methodology for the calculation of conversion factors shall be documented. Calculation of conversion factors must take into account the different processing steps involved and spills or losses, to ensure that disproportionate allocation of losses to non-certified product does not occur. |  |
| 3.1.3  | The economic operator must maintain the accuracy of any measuring equipment used. | Y/N | Calibration of metering and weighing equipment in the operations or used by subcontractors for volume or weight input and output shall be undertaken as per manufacturer’s guidelines.  |  |
| 3.1.4 | The volume of the Bonsucro/Bonsucro EU RED certified product received and the associated sustainability characteristics must be recorded in the system, within one week of entering the system, after validity has been confirmed (indicator 2.1.1).  | Y/N | One week is counted from the date the product is physically received or ownership is taken, as specified in the procedures. The economic operator may collect data and records and input these at regular intervals (if set out in procedures) rather than as received.  |  |
| 3.1.5 | Whenever multiple sugarcane-derived products are produced at a given step in the sugarcane supply chain (e.g. mill), sustainability characteristics shall be attributed to all materials equally, with the exception of GHG emissions, which are allocated on an energy basis (See Bonsucro Production Standard – Annex 3). | Y/N | Examples of multiple products include:* Juice and bagasse, following the crushing of sugarcane;
* Sugar and molasses, following the refining of sugarcane juice;
* Ethanol and vinasse, following the fermentation of molasses.
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| 3.1.6 | Allocation of Bonsucro/Bonsucro EU RED data must only be to products which are fungible with sugarcane-derived products.  | Y/N | For example, data can be allocated to any type of ethanol (e.g. corn, wheat, sugarcane) or any type of sugar (cane, beet), provided they could be mixed (are ‘fungible’). Bonsucro/Bonsucro EU RED data cannot be allocated to products which can’t be made from sugarcane, for example no Bonsucro/Bonsucro EU RED data could be allocated to vegetable oil biodiesel or wheat flour.  |  |
| 3.1.7 | The volume of the Bonsucro/Bonsucro EU RED certified product and the associated sustainability characteristics leaving the system must be recorded in the system within one week. | Y/N | One week is counted from the date the Bonsucro/Bonsucro EU RED certified products physically leaves the site or the client takes legal ownership, as specified in the procedures.The economic operator may collect data and records and input these at regular intervals (if set out in procedures) rather than as received.  |  |
| 3.1.8 | The economic operator must undertake inventories of the input/output balance of the Bonsucro/Bonsucro EU RED certified product at fixed regular intervals, for each operation site, not exceeding three months. | Y/N | This includes checking the physical stock-keeping and the data stock-keeping, taking into consideration the conversion rates. |  |
| 3.1.9 | The volume of Bonsucro/Bonsucro EU RED certified product received shall be greater than or equal to the volume or quantity of Bonsucro/Bonsucro EU RED certified product supplied to clients over a fixed inventory period of maximum three months. | Y/N | This is applied at the site at which the economic operator is applying the mass balance system. The fixed inventory period is determined by the operator and it can be less than three months, to the operator’s choice.  |  |
| 3.1.10 | Where the balance of inputs and outputs is positive a the end of the economic operator's inventory period, sustainability data may be carried into the next inventory period. EU RED Only: The amount of sustainability data carried over must correspond to the amount of physical stock held at a site at the end of the inventory period. | Y/N | If data is carried over, all original information, e.g. initial date of entry into the system, must be maintained. |  |
| 3.1.11 | Sustainability data expires three years from the date of entry into the system or until the end of certification of the economic operator, whichever occurs sooner. | Y/N | If an economic operator does not maintain a valid certificate, then the data not transferred to clients will be considered expired. |  |
| 4.1.1 | Each consignment transacted must be recorded uniquely in the system. | Y/N | Unique identification must be by batch number, product code or other identification method and data as in Annex 1.  |  |
| 5.1.1 | Each consignment supplied to clients must contain a specification with, at a minimum, the data in Annex 1, clearly specifying the scope of compliance: Bonsucro compliant or Bonsucro EU RED compliant. | Y/N | Specification meeting the minimum data of Annex 1 does not need to be sent with each consignment, if it is included in a contract. |  |
| 5.1.2 | Invoice and/or supporting documentation of outgoing Bonsucro/Bonsucro EU RED certified product must be sent to the client within 30 days of physical shipment. | Y/N |  |  |