

1. High Conservation Values

The High Conservation Value (HCV) concept was originally developed by the Forest Stewardship Council to safeguard key environmental and social features and functions in certified forests. The approach has since been widely adopted by schemes and standard setters for responsible production of a range of other commodities. Today the HCV approach is the globally most widely recognised and used mechanism for defining and identifying critically important natural and human landscape conservation values.

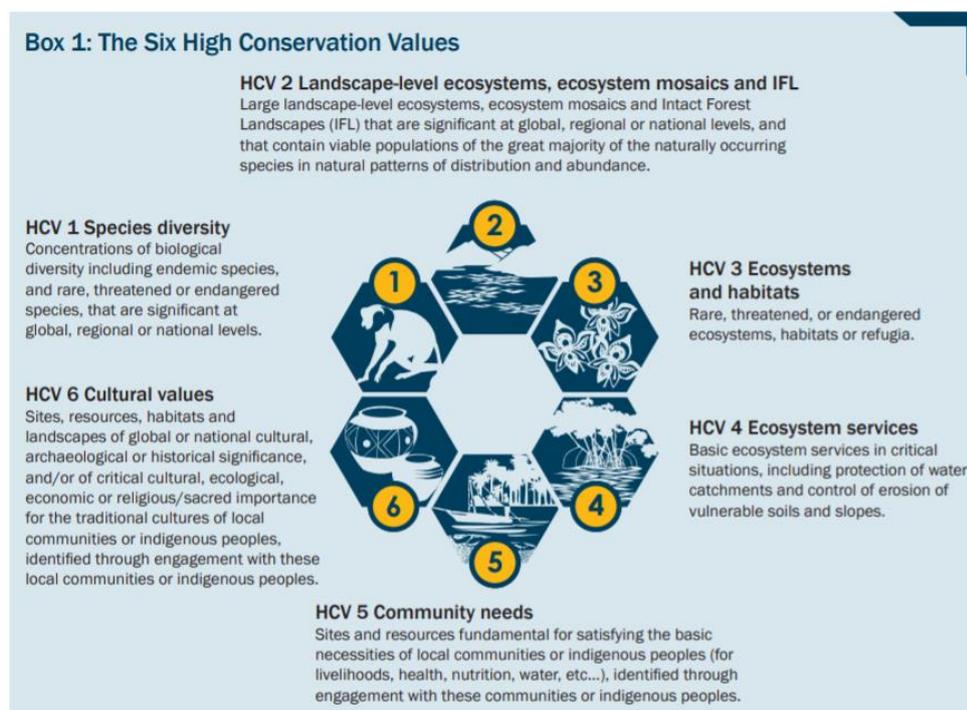


Fig. 1 The six categories of HCVs.

Discussions between Bonsucro and the HCV Network since 2018 have identified four potential collaborative work streams aimed at helping Bonsucro's certificate holders to apply the HCV approach. This report addresses the first two of these, which include to:

1. Assess overall risks to HCVs from sugarcane production;
2. Analyse the current Production Standard (and proposed changes) against the HCV categories to identify any gaps where indicators do not provide adequate safeguards for HCVs;
3. Suggest how gaps that apply across all scenarios may be addressed through changes of indicators (e.g. related to riparian buffer zones or no-spray zones);
4. Identify gaps that are of concern only in situations of elevated risk (and so better addressed as part of procedures to assess and mitigate risk);
5. Sketch a risk-based framework for implementing Bonsucro's HCV requirements across the supply base, tailored to mills as the unit of certification;
6. Propose how Bonsucro can formulate HCV requirements that reflect this framework;
7. Review various options and mechanisms for assessing and compensating for clearing of areas with High Conservation Values post 2008.

2. Risks to HCVs from sugarcane cultivation and milling

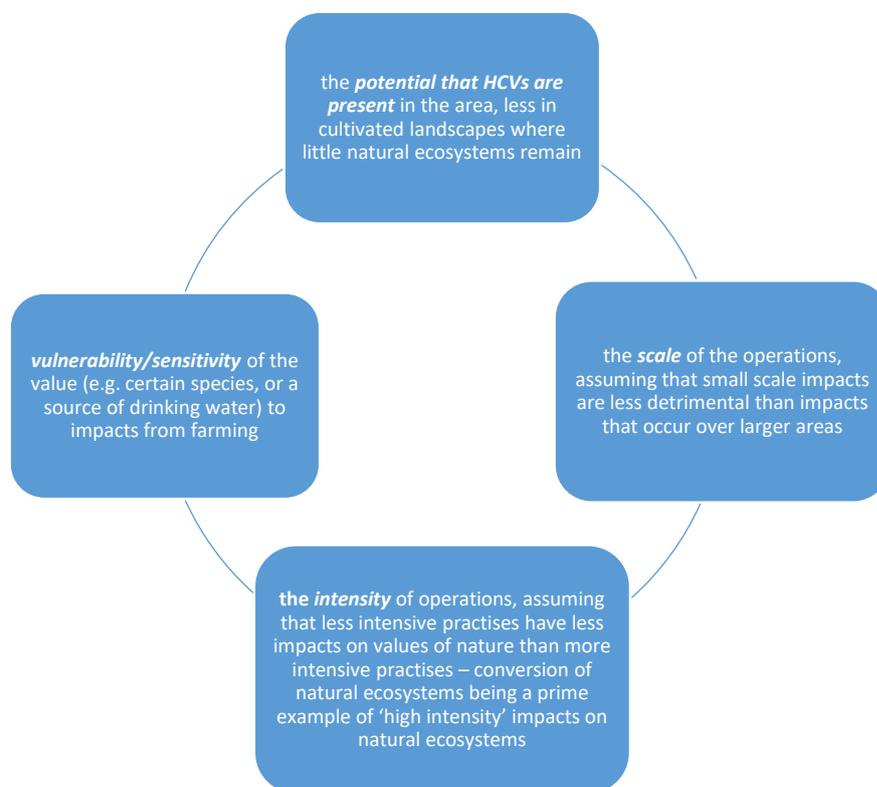
Sugar cane is a C4 crop well adapted to warm, sunny conditions with ample rainfall. Much cane is grown on lands originally covered by low land rainforest, but sugar may also be grown in drier, more seasonal subtropical landscapes provided that the fields are irrigated. Like any other agricultural activity, sugarcane cultivation, and expansion of cultivation into natural ecosystems, may impact negatively on HCVs. Negative environmental impacts may also arise from mills that do not operate closed circuit systems for purification and reuse of water used to wash the cane stalks, and through discharge of effluents to water recipients from cleaning of the mill.

Table 1 Summary of risks of sugarcane production on the High Conservation Values

	<p>HCV 1 Species diversity</p> <ul style="list-style-type: none"> • Most sugarcane is grown in landscapes moulded by conversion of natural ecosystems and human impacts to such an extent that little if any 'original nature' remains – this is true whether cane is grown in large, industrial scale monocultures like in Brazil, or in smaller scale, patchy agricultural landscapes in e.g. India and Pakistan. • Cane cultivation areas are likely to have lost most of their original flora and fauna, including species potentially qualifying as part of 'nationally significant concentrations of biodiversity'. However: <ul style="list-style-type: none"> • Some larger, wide-roaming animals – both herbivores and carnivores – may move through, seek shelter or even feed in agricultural landscapes. Such species may be negatively impacted by hunting/persecution, as well as by fencing that restrict animal mobility in the landscape; • Leakage of pesticides, fertilisers, and oxygen-consuming effluents from cane- or mill-washing may affect downstream wetland / aquatic fauna; • Farming activities, including cane cultivation, may impact negatively on the flora and fauna in nearby reserves and other natural areas; • Conversion to expand cane cultivation onto lands not previously used for agriculture or pasture is likely to lead to substantial loss of local biodiversity.
	<p>HCV 2 Large landscape level ecosystems</p> <ul style="list-style-type: none"> • HCV2 refers to landscapes relatively little affected by intense human activities such as forestry, permanent agriculture or infrastructure. Risks to HCVs are concentrated to frontier areas where natural ecosystems like forest, savanna, cerrado or native grasslands are converted, often initially for pasture land that is later turned over into crop cultivation. Farming in areas nearby HCV 2 areas may also cause indirect negative impacts, e.g. through farm roads facilitate access to previously more inaccessible areas.
	<p>HCV 3 Rare, threatened and endangered Ecosystems</p> <ul style="list-style-type: none"> • Risk factors for HCV 3 are largely related to conversion of natural ecosystems to agriculture, and to downstream effects of leakage of chemicals and siltation of rivers, wetlands, lakes and coastal areas.
	<p>HCV 4 Critical Ecosystem Services</p> <ul style="list-style-type: none"> • Vital services of nature include water security: sufficient local availability/supply of water for drinking, washing and other household use, as well as for local farming; to protection of soils against erosion (causing loss of productivity), and to stabilising of steep slopes against mudslides after heavy rains. • Water security may be threatened by overuse through irrigation (both surface and groundwater) particularly so if water rights are not well regulated and/or if inefficient practises lead to loss of large amounts of water through leakage or evaporation. Irrigation may also cause soil salinization, reducing agricultural productivity and affecting local livelihoods.
	<p>HCV 5 Basic community needs</p> <ul style="list-style-type: none"> • Basic community needs refer to water security, food security and access to natural resources traditionally used to sustain local livelihoods. Such needs partly link to other HCVs, particularly HCV 4. However, what constitutes basic community needs may change over time, and communities may be willing to forego some of their previous resource base provided that they get adequate compensation and/or access to suitable substitutes. Therefore, a key aspect of HCV 5 is that local people themselves identify what constitutes their basic needs, and that any relinquishment of rights or resources is preceded by informed free, informed consent (FPIC). • Risk to HCV 5 largely relate to quantitative loss of resources through conversion of natural habitats to agriculture, through factors that affect water and food security, and through loss of resource quality through e.g. pollution, erosion or soil salinization.
	<p>HCV 6 : Sites and resources associated with local cultural identify, and to sites, monuments and remains of wider, national historical and archaeological interest</p> <ul style="list-style-type: none"> • While (more spectacular) representatives of the latter category may be recognised as national historic monuments or even World Heritage Sites, the identification of locally important places and sites normally requires dialogues with local peoples. • Most threats to HCV 6 are related to conversion and associated destruction of sites and artefacts. Values may also be lost as traditions change and e.g. previously open and tended sites are overgrown with trees.

3. Different levels of risk

Risks that HCVs are lost or severely degraded as a result of on-going crop cultivation or expansion, are products of several factors:



The risk questionnaire and procedure is developed and designed for the context and conditions associated with the Standard and the commodity.

Tentative risk levels (subject to further discussion and refinement) applicable to sugar cane cultivation:

Low risk:

- On-going, small-medium scale sugarcane cultivation on lands without overlapping claims or land rights, and outside the vicinity of protected areas (PAs), key biodiversity areas etc.;

Medium risk:

- On-going small-medium scale sugarcane cultivation on lands with overlapping claims or land rights; and/or close to protected areas (PAs), key biodiversity areas (KBAs) etc;
- On-going large-scale cane cultivation on lands without overlapping claims or land rights, and outside the vicinity of protected areas (PAs), key biodiversity areas (KBAs) etc
- Small-scale conversion of natural ecosystems to cane cultivation, (taking into account cumulative impacts at the landscape level of repeated small-scale expansion).
- Risks of downstream impacts from leakage of chemicals.

High risk:

- On-going, large scale sugarcane cultivation on lands with overlapping claims or land rights; and/or close to protected areas (PAs), key biodiversity areas (KBAs), Ramsar sites, IFLs, etc;
- Larger scale conversion of natural ecosystems (or pasture¹) to cane cultivation.

4. On-going cultivation

The HCVRN has worked with several certification schemes to develop simple risk-based approaches for use by farmers and group managers to assess the risks to HCVs related to their particular contexts. The aim of this section is to identify what safeguards are already in place in the Bonsucro standard, to what extent these safeguards may be considered adequate to mitigate risks, and to recommend additional safeguards that may be necessary. As the Bonsucro standard is currently undergoing revision, we have attempted to take account of ‘new’ criteria and indicators (draft revised V 5.01), as well as well as of the ‘old’ V 4.2 Production Standard from 2015.

HCV 1,2 and 3 (environmental HCVs)

Conservation of biodiversity and habitats is embedded in criterion (old) 4.1.3 / (new) 4.1.4, which requires certificate holders to develop an Environmental Impact and Management Plan for key environmental issues: biodiversity, ecosystem services, soil, water, air, climate change, use of crop protection chemicals, use of artificial fertilisers, cane burning and noise. The associated guidance elaborates the biodiversity component as, *“for example: loss or reduction of biodiversity, conservation of natural fauna and flora, including rare, threatened or endangered species, habitats, provision of habitat corridors, constitution of set-aside area to enhance biodiversity, management of HCVs, conservation of wetlands and other natural areas in a satisfactory state”*.

The above is a fairly comprehensive list of aspects related to biodiversity conservation, including addressing conservation attributes linked to HCV 1,3 (and more implicitly) HCV 2. Criterion 4.1.3/4 also refers to other components (ecosystems services, soils etc...) with examples in the associated guidance for each of which the certificate holder shall *“identify... the impacts of its activities; propose actions (preventive and corrective) to mitigate the identified impacts and to manage or enhance the natural resources; set measurable objectives; implement the actions; monitor progress against the objectives; and act accordingly”*. Taken literally, implementation of this criterion requires more than 200 activities, many of which require consultation with potentially affected stakeholders.

HCV 4 (Ecosystem services)

Examples related to water protection embedded in 4.1.3/4.1.4 include: *“availability of water resources, pollution of water basin, impact of intake of water on water availability, consumption of water, quality of effluents, management of irrigation systems, quality of irrigation water”*.

In addition, water quality is implicitly addressed by a number of other criteria: old 4.1.1 = new 4.1.2 *Placeholder on dissolved oxygen in receiving stream*; 4.1.4 (Threshold for) *ratio of fertiliser N and P applied to fertilizer N and P recommended by soil or leaf analysis*; 4.1.5 (Threshold for) *agrochemicals applied per hectare per year*; 4.1.6 (No use of) *banned agro-chemicals* – all of these provisions that may reduce problems related to water pollution and leakage from pesticides and fertilisers.

¹ While conversion of tropical or subtropical pasture land to crop cultivation **may not in itself cause much** biodiversity loss, it may generate additional conversion of forest or savanna off site to make up for lost pasture land.

Soil protection examples embedded in 4.1.3/4.1.4 include: *“loss of nutrients, erosion, alkalisation, acidification, loss of carbon, erosion, microbiological fauna, trash blanket, fallow cropping, compaction”*.

HCV 5 and 6 (Basic needs of communities and cultural values)

As stated above, water availability is addressed by several examples referred to in 4.1.3/4.1.4. Demonstrable and non-contested water rights are also explicitly referred to in (new) 1.1.2 (old 1.2.1): *Physical mapping of formal and informal land and water claims* and in (new) 2.1.1 *Land and water that is legitimately contested by other users*. Other criteria with (implicit) bearing on local water availability and security are: 5.2.1 *Water Stewardship Plan in place*; 5.2.2 *Net water consumed per unit mass of product*; 5.2.3 *For irrigated cane, efficient use of water*. Local water- and food security is also (implicitly and generically) addressed in (new) 1.1.4 *Social and Environmental risks & Impact analysis developed* which refers to *“...actual and potential impacts of the operation on...communities requiring free, prior and informed consent (FPIC)”*.

Respect for cultural values is not explicitly addressed for on-going cultivation (but referred to in the guidance for ESIA in 5.7.1/5.6.1). However, maintenance of local HCV 6 may be an outcome of stakeholder consultation as per the (new) 1.1.2.

Recommendations: On-going cane cultivation (and milling)

Overall, the Bonsucro standard is unusual in its emphasis on *processes* for identifying social and environmental impacts and on plans for managing and mitigating them. The associated guidance provides examples of topics to be addressed, but does not say about how, beyond *“to identify the impact of activities on the environment and to propose and manage a set of actions aimed at mitigating the negative impacts and managing the natural resources”*.

This requires the certificate holder to adequately identify and address (and auditors to verify compliance with) single criteria/indicators encompassing a very wide range of issues, with little guidance on how to prioritise, and what to achieve. Furthermore, there appears to be duplications, e.g. between the (new) 1.1.4 and 4.1.3/4.1.4. Large mills (and cane growers) with recourse to consultants who may be able to deal with such complexity, while medium and small operators may struggle to comply.

Thus, even though the Bonsucro production standard appears to address most aspects required to mitigate risks to HCVs in scenarios of *on-going* cane cultivation in *low risk settings*, we feel a need to know more about how the standard is applied, and compliance verified, to conclude so with confidence.

Provisionally, we recommend Bonsucro to:

1. Consider breaking up very complex criteria like 4.1.4 (EIMP) / 4.1.3 (HCV/forest-loss cut-off dates) into smaller components/indicators;
2. Articulate more clearly the desired outcomes linked to each criterion/indicator;
3. Provide clearer guidance on how to identify, prioritise, mitigate and monitor impacts;
4. Adopt a simplified biodiversity / focal species approach for small and medium scale certificate holders modelled on HCVRN’s work with BCI and RA;
5. Be more explicit on maintaining and restoring riparian buffers against field run-off;

6. Be more explicit on how to mitigate erosion of steep slopes;
7. Avoid, as far as possible, duplications, overlaps and multiple references to the same issue;

5. Future conversion

Maintaining HCVs

HCVs values are frequently linked to natural forests and other natural ecosystems, but can also be associated with other land areas, such as mixed-land use zones that are critical for watershed protection or for the livelihoods of indigenous peoples or local communities. The global HCV definitions are therefore applicable to any ecosystem (terrestrial, aquatic and marine) through a process of interpreting the definitions to the ecosystem and regional context.

References to HCVs are also embedded in many consumer goods company commitments and policies. The Accountability Framework initiative (AFi) have developed common norms for setting and implementing ethical supply chains. These recommend companies to consider use of the HCV approach for acquisition and development of new productions sites (particularly if in the absence of comprehensive no deforestation policies), as well as to facilitate effective land management and long-term protection of conservation values.

Bonsucro addresses conversion/expansion through (old core indicator) 4.1.2/ (new) 4.1.3: *(Zero) Percentage of areas defined internationally or nationally as legally protected or classified as of High Conservation Value² planted to sugarcane after the cut-off date of 1 January 2008. In the absence of HCV maps or databases, credible documentary evidence shall be provided to demonstrate that no HCV is converted after 1 Jan 2008.*

As 4.1.2/4.1.3 cover all expansion of cane cultivation after 1 January 2008, they apply to any future conversion as well as to conversion in the past. The problem is that the requirements are difficult to implement. HCV assessments are normally conducted on a case-by-case basis, usually by producers in order to comply with various commodity certification scheme requirements. Over time, a sparse patchwork of HCV assessments has accumulated, almost exclusively related to forestry (FSC) and oil palm cultivation (RSPO). Public summaries of these assessments are available, but there are no widely applicable HCV maps or databases.

In the absence of such data, HCV assessments have proven to be a hurdle, particularly for small holders and medium-sized operators who normally lack capacity to do assessments themselves, as well as resources for hiring consultants. To overcome this barrier, the HCVRN has developed a suite of simplified approaches tailored to *different levels of risk*. These approaches build on that activities conducted by small and medium sized farmers often imply less risks to HCVs, and that therefore use

²The Bonsucro glossary definition of 'High Conservation Value' is aligned with HCVRN's definitions with two exceptions: 1) HCV 2 lacks the reference to Intact Forest Landscapes (adopted by FSC and the HCVRN in 2014), and 2) Bonsucro adds: "[HCVs] Also includes soils with a large risk of significant soil-stored carbon such as peat lands, mangroves, wetlands and certain 100% native and natural grassland (that were never modified by human activities)".

of simple risk questionnaires and associated generic mitigation measures, in combination with provisions already in place in standards, often suffice to adequately mitigate risks to HCVs.

Scenarios of elevated risk require additional safeguards, but such procedures may also often be simplified, restricting licensed 'by-the-book'- assessments to settings where risks are high that HCVs are lost or severely degraded. Simplified HCV risk questionnaires and risk mitigation procedures, applicable to different scenarios of cane cultivation, are expected to be developed through further collaboration between Bonsucro and the HCVRN.

Curbing deforestation

4.1.2/4.1.3 define lands off-limit to conversion as:

- legally protected areas;
- areas classified as of High Conservation Value;
- “soils with...significant soil-stored carbon such as peat lands, mangroves, wetlands and certain 100% native and natural grasslands” (added as HCVs in the Bonsucro glossary).

[In addition, there are the mandatory provisions for biofuels as set out in EU's Renewable Energy Directives, referred to in 6.1.2: *Percentage of land with high biodiversity value, high carbon stock or peatlands planted to sugarcane after the cut-off date of 1 January 2008*. These directives exclude conversion of: (a) primary forest and other primary wooded land, (b) areas designated by law or by the relevant competent authority for nature protection purposes; (c) highly biodiverse grasslands (d) new nature protection areas derived from a published European Commission decision.]

The HCV concept was developed to safeguard outstanding environmental and social values, rather than to exclude supply from deforested areas. Increasing focus on the effects of global deforestation has spurred development of complementary tools for this purpose. Most referred to amongst these is the High Carbon Stock Approach (HCSA)³, the indicative toolkit for the humid tropics which helps to separate between lands suitable for development and conservation, respectively - designations assumed to be further fine-tuned and agreed upon in local processes. The HCV approach is an integral part of this and other zero-deforestation approaches.

Currently, only bioethanol that comply with the EU RED regulations as set out in 6.1.2 may be considered 'deforestation-free'. Should Bonsucro seek to add provisions designed to further curb or avoid deforestation caused by cane cultivation for other purposes, we recommend formulating requirements aligned with AFi's definitions and recommendations - but also to be aware that existing 'no deforestation' methodologies focus on large producers and concessionaires, and that overly rigid standards may create (additional) barriers to smallholder participation⁴.

Environmental and Social Impacts Assessments

(Future) conversion is also addressed by (old core indicator) 5.7.1 /new 5.6.1: *Percentage of greenfield expansion or new sugarcane project covered by ESIA*. These indicators set out requirements for procedures to be followed prior to conversion, including how to identify,

³ The HCVRN and the HCSA collaborates on guidance and quality assurance for integrated HCV-HCS assessments.

⁴ The HCVRN, Proforest and Daemeter is in the process of developing simplified approaches for smallholders that include 'no deforestation' components.

implement and monitor mitigation measures and engage with key stakeholders based on the principle of free, prior and informed consent.

The scope of the ESIA, as set out in guidance for the (old) 5.7.1 includes: *Soil; Water; Biodiversity; Ecosystem Services; Air; Climate; Waste and Noise; Structure; Areas or resources of customary use; Land conflicts; Areas of high cultural, archaeological and historical values; and Food security*. This is an ambitious list, but as noticed above, quality implementation of very comprehensive indicators may be a challenge.

The proposed 5.6.1 differ from 5.7.1 in two respects: it applies to conversion that increases the average farm area under cane by more than 5%, as opposed to 10% in the older version, and – more importantly – the reference to the 2008 cut-off date is dropped, so that 5.6.1 only requires retrospective ESIA for expansions that happened *within 12 months of initial certification*.

A one-year retrospective timeframe is certainly more realistic than going back to 2008. However, to be applicable in retrospective, the guidance needs to be reformulated as relates to FPIC (and other parts of the process normally undertaken *prior* to expansion). We also note that potential adoption of 5.6.1 will require robust processes to handle conflicts that backdate more than a year, as well as identification and engagement with stakeholders on land rights and claims (as set out in the proposed new 1.1.1; 1.1.2; and 1.1.4).

6. Conversion in the past

Cut-off dates

Most certification schemes wish to avoid being associated with conversion of environmentally or socially valuable areas to crop land, often relying on HCVs to define unacceptable land use change. To this end, schemes seek to stop farmers from ‘first convert, then apply for certification’. The mechanism is normally a *cut-off date* after which farmers, to be eligible for certification, must not have converted land in ways considered unacceptable in the standard.

However, addressing conversion that has already happened remains a major challenge, partly because of the difficulties of assessing values that were lost years, or even decades ago. While negative social impacts as a result of past conversion may be estimated through dialogue with affected people, robust, retrospective identification and assessments of environmental HCVs long gone is often impossible without good baseline data.

Cut-off dates generate other problems as well. As time passes, schemes and producers may come to view barriers to certification built on past behaviour as increasingly unfair. Most schemes started small, and farmers who converted lands in the past may not even have been aware of certification as an option at the time. Such producers will be forever excluded from certification if cut-off dates are rigidly upheld.

Option 1: Compensation for conversion after the cut-off date

Rather than keep doors shut forever, several schemes look to compensation as a mechanism for allowing past converters into the system. Compensation can be sought either as a) means to mitigate specific negative impacts / restore losses that resulted from conversion, or b) as a more general ‘fine’ for not complying with the scheme rules at the time of conversion.

The first approach is subject to the same methodological difficulties as other retrospective assessments. Problems related to the second approach include an issue of a more philosophical nature: if the conversion was legal at the time, and farmers did not breach any voluntary commitment, for what are they held responsible, i.e. for what is compensation required? Responses to this question may be e.g. that the scheme considers (certain kinds of) conversion to be an inherent, generic 'wrong-doing', regardless of who did it, for what purpose, or what were the consequences. This approach - decoupling conversion from the consequences of that conversion - has the distinct benefit of doing without retrospective value assessments - the magnitude of (environmental) may simply be a fixed function of the size of the converted area.

As yet⁵, the only major scheme that operates a mechanism for compensation is RSPO. Their approach is best described as a hybrid combining the above a- and b-approaches, so that compensation liabilities are functions of both 'breaches of commitment' (in this case implicit commitments by RSPO members to abide by the organisations' core principles even before certification) and prior-to-conversion forest structure from old satellite images as a proxy for values lost. [LINK!!!!](#)

Regardless of rationale, experiences from RSPO demonstrate that attempts to restore (environmental) values where they once existed may not necessarily be the best use of compensation liabilities, as this may be far more complicated, and provide less ecological benefits, than e.g. off-site conservation of existing nature, buying shares in biobanks, or support of existing habitat or species conservation projects.

Finally, due to the fundamental differences between conversion that has already taken place, and conversion that has not yet happened, we strongly recommend addressing these through separate criteria/indicators - one related to past (the old cut-off date) and one that addresses present and future conversion based on a new, additional cut-off date (such as the date when the revised standard takes effect).

Option 2: Rolling cut-off dates without compensation

Another option is to drop the old, fixed cut-off date, in favour of a new, rolling one. This approach circumvents some of the problems with fixed cut-off dates - rather than for ever keeping 'sinners' out, a rolling date generates 'probation periods' - once a certain time, e.g. five years, has elapsed since the conversion, 'sins are absolved' and converters are allowed in. This means that there is no need for compensation mechanisms - a distinct advantage!

The new proposed 5.6.1, with its rolling one year period, utilises this approach. However, rolling cut-off dates have their downsides as well. They are less open to abuse than alternatives without cut-off date, but they are not immune - farmers planning far ahead (and in no immediate need of a certificate) may still convert and patiently wait for their period of exclusion to end. Thus, rolling cut-off dates are less effective in achieving what cut-off dates were supposed to do in the first place - to avoid that the scheme is associated with practises perceived as unacceptable.

Recommendations:

⁵ FSC is in the process of revising its position on conversion, the outcomes of which may come to include elements of compensation.

General:

1. Update the standard, including guidance and glossary, with the verbatim HCVRN definitions of High Conservation Values (other areas/ecosystems considered 'off limit' for conversion may be added separately).

Option 1. Fixed cut-off dates with compensation:

2. Use separate criteria to address past and future conversion – add a new, 'from now on' cut-off date;
3. Avoid attempts to retrospectively assess real environmental values lost (including HCVs);
4. Separate compensation for social grievances (essentially lack of FPIC at the time of conversion) from compensation related to the environment;
5. Rely on generic procedures, e.g. the size of a converted area as a simple proxy for determining environmental compensation. Avoid in-depth case-by-case attempts to calculate compensation liabilities, as such are likely to be expensive, time-consuming, and fraught with friction and politics;
6. Be flexible in terms of how to compensate for environmental impacts - be open for support of conservation projects and nature conservation off-site, as well as to on-site restoration/remediation measures.

Option 2: Rolling cut-off dates without compensation:

7. Consider carefully the pros and cons of rolling cut-off dates in the Bonsucro context – this should take account of the historic and present role of cane expansion as a driver of value loss and deforestation, likely future expansion scenarios, as well as reputational risks.

7. Proposed formulation for HCV requirements and framework for implementing these

HCV protection and maintenance is linked with: past conversion cut-off dates, the Environmental and Social Impact Assessments under expansion (5.6.1), and the Environmental and Social Management Plans (4.1.1/1.3.2) for on-going cultivation. Here we propose an approach to maintain HCVs under current cultivation and future expansion. As discussed earlier, retrospective identification of HCVs from past expansion is complex and unreliable. We therefore recommend using a Land Use Change Analysis that refers to proxies, such as no loss of forests, forest categories or natural ecosystems, rather than specifying past loss of HCVs.

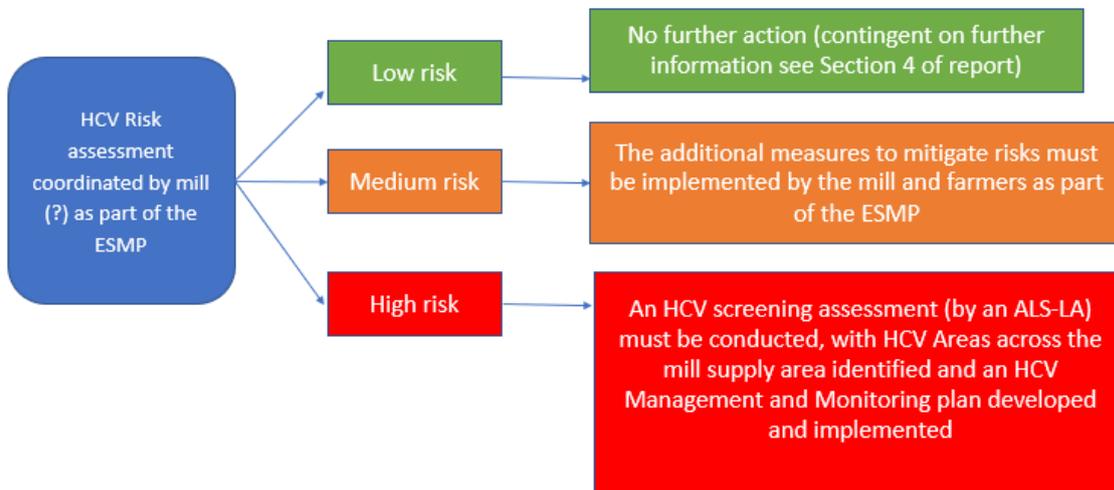
To reduce duplication of effort and content with ESMP and ESIA, a risk-based approach should be developed that provides extra safeguards for maintaining HCVs through the ESIA and ESMP in situations of elevated and high risks.

The maintenance of HCVs can either be included as a separate criterion (as shown in the bold text below) or required procedures within the other linked criteria (i.e. ESMP and ESIA for expansion) in both instances by applying the risk-based procedures.

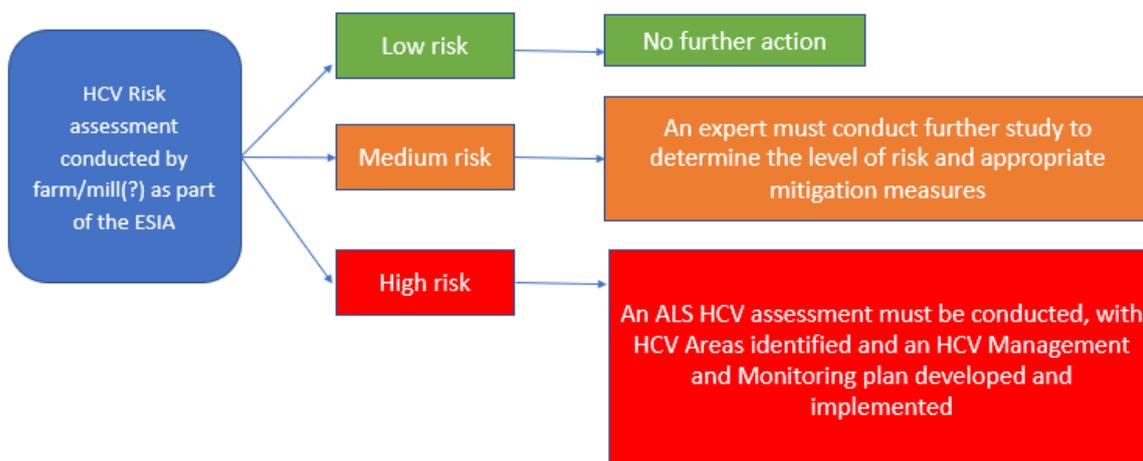
Criterion: HCVs are being maintained and enhanced on and around farms

Indicator

For on-going cultivation the mill must conduct/coordinate the Bonsucro HCV risk assessment procedure for the whole supply area with HCV mitigation measures and management plans implemented as part of the ESMP (4.1.1/1.3.2)⁶⁷



For green field expansion or new sugar cane projects the farm must conduct the Bonsucro HCV Risk Assessment with HCV mitigation measures and management plans⁸ implemented as part of the ESIA (5.6.1)



⁶ Tentative risk levels are on page 4 and include on-going cultivation and expansion

⁷ HCV screening is a procedure for assessing risks to HCVs across a landscape. It is not an HCV Assessment. The HCV Network has developed guidelines for [HCV screening](#) at landscapes, and to ensure high quality HCV screening we recommend that the landscape screening is conducted by an Assessor Licensing Scheme Licensed Assessor

⁸ The Assessor Licensing Scheme (ALS) is managed by the HCV Resource Network. It ensures high quality HCV assessments by awarding license to qualified and experienced practitioners, and conducts quality control of HCV and HCV-HCSA assessments

Next steps

This report has conducted a desktop analysis to identify risks to HCVs from sugar cane production and propose an approach to embed the HCV Approach into the Standard, that builds on the Standard's existing structure and other related criteria.

Finalising the risk-based procedure will be subject to a follow-on piece of work, working closely with the Bonsucro team. This will develop the risk questions and measures to be taken under medium and high-risk outcomes.

There remain two principle related issues that merit quite some further discussion to make these operational, and that we can provide input on.

1. Past conversion using proxies, the cut-off dates (rolling or fixed) and the compensation procedures for past conversion (as introduced in Section 6)
2. Managing the risks of non-certified suppliers in the supply base and setting minimum requirements for non-certified suppliers. HCVRN, in collaboration with Proforest and Daemeter have developed an approach to meet deforestation-free sourcing requirements outside of certification, which could support this for certified mills sourcing from non-certified smallholders.