

## Bonsucro Draft Production Standard Version 5.7 Summary of the second public consultation (14<sup>th</sup> June – 13<sup>th</sup> July 2021)

This document presents the summary of comments received during the second public consultation which ran from 14<sup>th</sup> June to the 13<sup>th</sup> July 2021. This analysis has been integrated directly into the draft Production Standard V5.7 to facilitate the subsequent discussion on integration of pertinent comments for each indicator. You will see the comment summaries for each indicator and its corresponding guidance in a separate table row with blue background colour placed just above the corresponding indicator.

This summary report is accompanied by an Excel sheet with the collated comments, organized per Criterion with the technical analysis shown as well, for all those wishing to read the original comments. Note that the comments have been anonymised to facilitate bias-free concentration on the content of the comments. Graphs illustrating the feedback on level of clarity have been included for each indicator on the excel sheet.

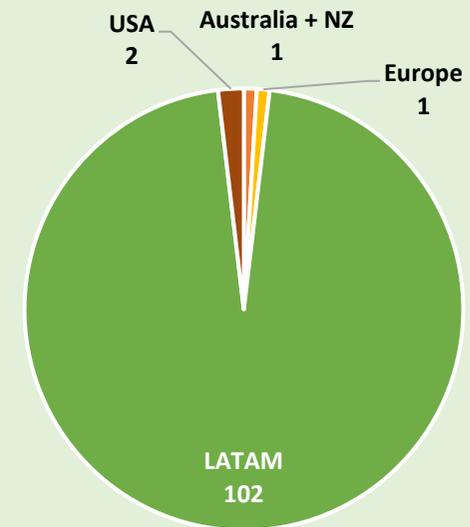
### Overview of participation:

Total number of participants: **107** (compared to 259 participants in the first public consultation)

### **Participants' geographical location:**

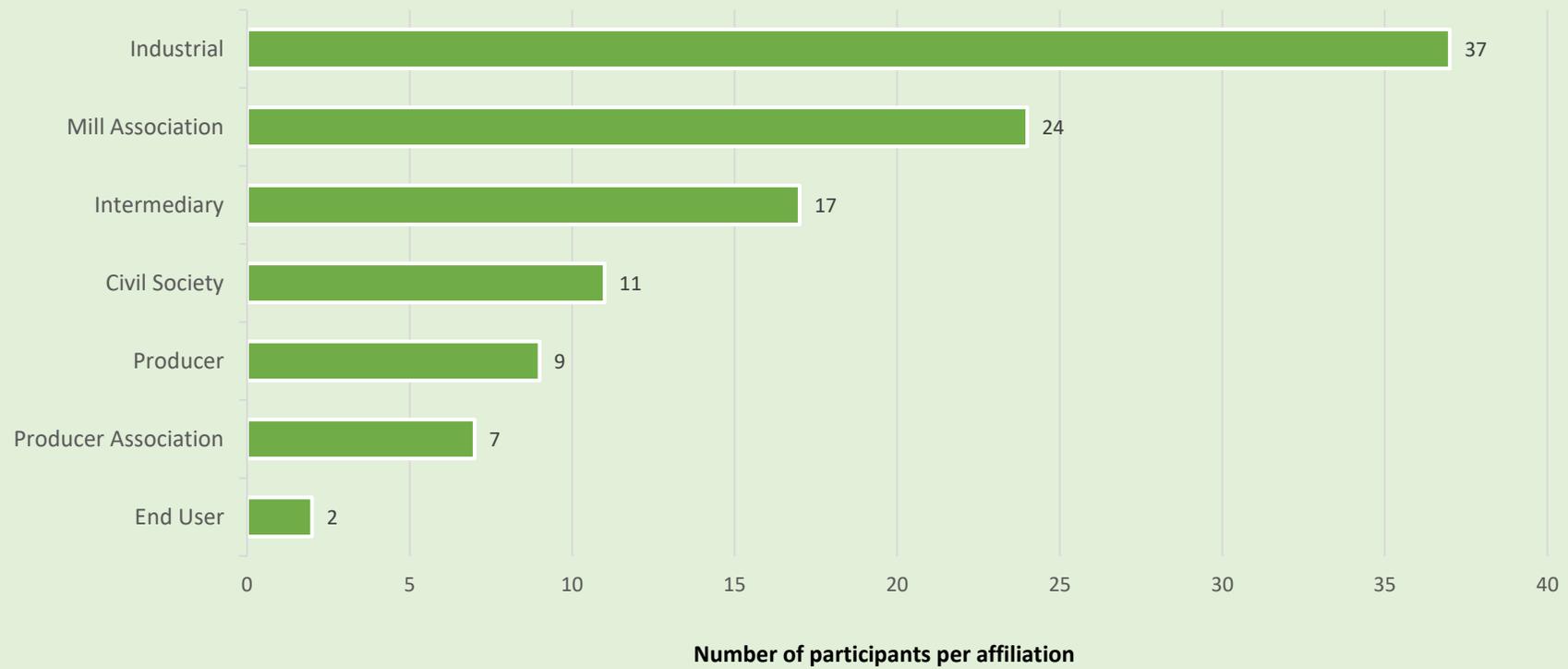
95% of participants come from Latin America (compared to 75% in the first consultation), while 2% come from the USA (against 4% in first consultation), and both Australia/New Zealand and Europe represent 1% of participation rates respectively (compared to 5% Europe and 4% for Australia/NZ in the first consultation). There were no participants representing African or Asian stakeholders in this consultation round (compared to 7% of participants from Asia and 4% from Africa in the first consultation).

### **Class representation:**



Number of participants per geographical region

The largest proportion of participants represent the Industrial class (35%), followed by Mill associations (22%) and Intermediaries (16%).

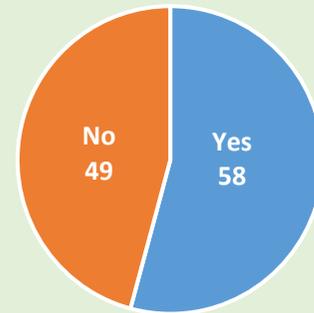


**Membership:**

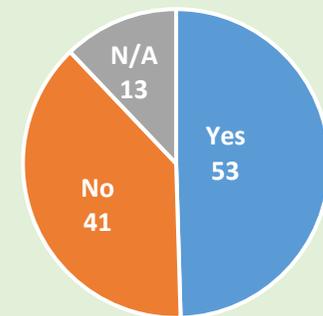
54% of participants are Bonsucro members while 46% are not.

**Certification:**

53 Bonsucro-certified members have taken part in this public consultation, most of them representing the Industrial sector.



**Number of Bonsucro members vs non-members**



**Number of certified participants vs non-certified participants**

**Comparability with the 1st Bonsucro Production Standard draft (presented during Public Consultation I):**

Nearly 90% of participants are familiar with the 1<sup>st</sup> draft of the Bonsucro Production Standard, presented during the 1<sup>st</sup> public consultation.

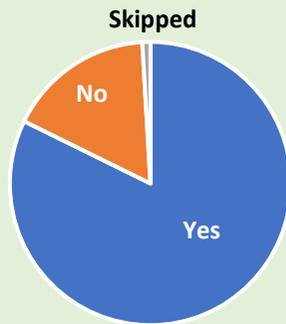
53% percent of participants think that the current draft’s structure is about the same as the 1<sup>st</sup> draft’s, while one quarter of participants think it has improved since the 1<sup>st</sup> draft and 8% think it is worse.

Just under 50% of participants find that the current draft’ language offers about the same level of clarity compared to the 1<sup>st</sup> draft, while roughly one third of participant find the language clearer. Only 4% of participant find the language to be less clear than it was in the 1<sup>st</sup> draft.

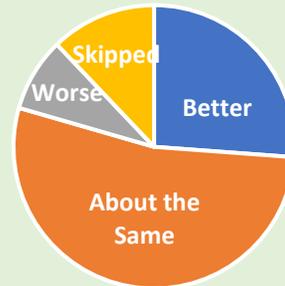
41% of participants find the current standard draft to be less repetitive than the 1<sup>st</sup> draft, while 45% think it has about the same level of repetitiveness. 13% find the current draft to be more repetitive.

Finally, 50% of participants think that the separation into normative and informative text is better in the current draft, while 36% think it’s about the same as the 1<sup>st</sup> draft’s and 3% think it is worse.

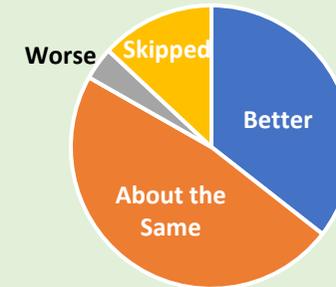
Are you familiar with 1st draft of Bonsucro Production Standard?



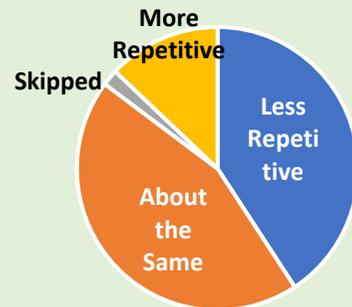
Compared to the 1st draft, is the structure of the standard:



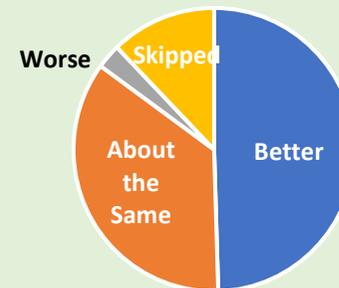
Compared to the 1st draft, is the clarity of language in the new draft:



Compared to the 1st draft, how do you consider the level of repetition of indicators in the new draft?



Compared to the 1st draft, is the separation into normative and informative text:



### **Overview of over-arching comments:**

1. Concerns over the high costs of implementing the new standard. This concern is also linked to the comment that Bonsucro certification does not produce a price incentive, so the members do not see a justification for the high costs of implementation. Smaller mills are particularly affected and this may limit uptake of certification. The new standard strongly focuses on social and environmental pillars, while neglecting the balance with the economic pillar.
2. Another comment that is raised repeatedly is the need to consider national contexts and this can be seen both from the legal context or from the industry context (operational reality). The application of some indicators are said to be inconsistent with national laws (generally comments from Latin America) whereas in some cases the indicators are said to be not reflective of how the industry is organised and set up (generally comments from Australia)
3. Limiting the scope of indicators to the certified area. There are many reasons for this comment. It is said to be very resource intensive to apply certain indicators to the entire supply base. It is also difficult to implement and monitor as the farmers are independent entities and the operators have little leverage or influence to compel them to comply with the Bonsucro requirements. Even with progressive implementation, this challenge cannot be overcome.
4. The terms “workers” and “employees” are used inconsistently throughout the document. Different participants have different views for which term they prefer and there are many comments throughout requesting replacement of “workers” with “employees” and vice versa.
5. Ensure consistency in the different language versions of the standards and guidance
6. Clarify how and which sections of the guidance should the auditors apply

### **Bonsucro Draft Production Standard Version 5.7**

As a multi-stakeholder organisation, Bonsucro seeks to engage stakeholders when changes are proposed and made to our standards. Here you will find detailed information about this process and current work on standards development, as well as information on how these key documents were created.



The Bonsucro Production Standard is at the heart of everything Bonsucro does. It sets out a definition of what sustainable cane production should look like, providing a comprehensive metric tool for sustainable farming and milling. Bonsucro wants to maximise the impact the Standard has on the future of the sugarcane sector and enhance the value added for the producers who implement, use and comply with it.

The “Bonsucro Production Standard” contains principles and criteria for achieving sustainable production of sugarcane and all sugarcane derived products in respect of economic, social and environmental dimensions. Its primary purpose is to define a set of principles, criteria and indicators, along with explanatory notes, for the assessment of the performance of operators against the three pillars of sustainability. The Standard is used by Bonsucro members who wish to achieve certification. It is also used by Licensed Certification Bodies and auditors when carrying out certification audits.

The Bonsucro Standard development and revision procedure is based on the [ISEAL Standard Setting Code](#). It requires a multi-stakeholder consultation and decision-making process to ensure clear and auditable conditions in the standard itself. The process is driven by stakeholder led Standard Revision Working Group (SRWG) and supported by the Technical Advisory Board and the Members Council.

[Standard Development and Revision Procedure](#).

**On 15 June, Bonsucro launched the second public consultation on the proposed changes to the Production Standard. The consultation will run until 15 July. Bonsucro members, non-members and all interested stakeholders are invited to participate and submit their feedback. The more input gained, the more robust the Standard will be.**

Below you will find the Bonsucro Draft Production Standard Version 5.7. Please feel free to provide comments on the draft Standard by completing Bonsucro Production Standard Consultation survey before the 15 July. Please refer to the Draft Bonsucro Production Standard V5.7 and the summary of changes since the first public consultation before answering the survey. The survey can be accessed through our website:

<http://www.bonsucro.com/production-standard-revision-public-consultation/>

Bonsucro will be hosting a series of webinars in English, Spanish and Portuguese on the changes to the Production Standard. To attend, please register via this link: <http://www.bonsucro.com/production-standard-revision-public-consultation/>

Please note:

- The scope column shows which indicators are core indicators, which apply to the mill or the agricultural area and which will need to be applied to the whole supply base as per Timebound Progressive Implementation Plan (TBPIP – see next page)
- All guidance in the Draft Standard is only indicative and can be found in Annex 2 of the standard. A revised calculator will be released to accompany the revised Production Standard.
- EU – RED principle is removed from the scope of this revision. It will continue to be included in the Standard as it currently stands as Principle 6. The Standard will automatically adopt all changes that are needed to comply with EU-RED II once released.

For any questions please contact Nahuel Tuñon on [nahuel@bonsucro.com](mailto:nahuel@bonsucro.com)

**'Traffic light' system:**

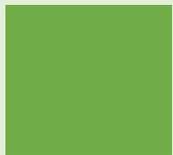
Each indicator have been attributed on of the three following colours to facilitate the prioritisation of the next steps of the standard review. *(Note that comments about scope, the need for national interpretations, etc. (see comments above) are not included in this system as they are common to all the criteria)*



Participants have called for significant changes to be made to this indicator



Participants have called for changes to be made, but they should not affect the general intent of the indicator



Participants have called for general clarifications and minimal changes to be made

## Overview of 'Traffic Light' coding across the Standard

1.1	1.2	1.3	1.4			
1.1.1	1.2.1 1.2.2	1.3.1 1.3.2 1.3.3 1.3.4 1.3.5 1.3.6	1.4.1 1.4.2 1.4.3			
Red	Green Yellow	Yellow Green Yellow Red Green Red	Yellow Red Yellow			
2.1	2.2	2.3	2.4			
2.1.1 2.1.2 2.1.3 2.1.4 2.1.5 2.1.6 2.1.7	2.2.1 2.2.2 2.2.3 2.2.4 2.2.5 2.2.6	2.3.1 2.3.2 2.3.3 2.3.4 2.3.5 2.3.6	2.4.1 2.4.2 2.4.3			
Green Green Green Green Green Green Green	Green Red Red Yellow Yellow Red	Green Green Green Green Green Green	Green Yellow Red			
3.1	3.2	4.1	4.2	4.3	4.4	4.5
3.1.1 3.1.2 3.1.3 3.1.4 3.1.5 3.1.6 3.1.7	3.2.1 3.2.2 3.2.3 3.2.4 3.2.5 3.2.6 3.2.7 3.2.8	4.1.1 4.1.2 4.1.3 4.1.4 4.1.5	4.2.1 4.2.2 4.2.3 4.2.4 4.2.5 4.2.6 4.2.7	4.3.1 4.3.2 4.3.3 4.3.4 4.3.5 4.3.6	4.4.1 4.4.2 4.4.3 4.4.4 4.4.5	4.5.1 4.5.2
Green Green Green Green Green Green Green	Green Green Green Green Green Green Green Green	Green Yellow Red Red Red	Green Yellow Yellow Yellow Green Green Green	Red Red Green Green Green Green	Red Yellow Green Red Yellow	Green Green
5.1	5.2	5.3	5.4			
5.1.1 5.1.2 5.1.3 5.1.4	5.2.1 5.2.2 5.2.3	5.3.1	5.4.1 5.4.2 5.4.3			
Green Yellow Yellow Green	Yellow Green Green	Yellow	Yellow Yellow Yellow			

## Progressive Implementation

### Feedback received on Progressive Implementation:

There is strong pushback against the broadening of scope to apply progressive implementation on the whole sugar cane supply area. The overwhelming majority of concerns raised (primarily from industry) is on the economic costs to do so. Participants felt that:

- This approach will make it impossible for many to maintain certification and may serve as a disincentive for others to implement the Bonsucro standard.
- In making the new revisions to the standard, it is necessary to be aware of the costs of its implementation, especially since it has been often stated that Bonsucro certified sugar obtains little or no economic recognition/price incentive.
- Bonsucro should focus on raising prices and demand for certified sugar, instead of putting obstacles to fair competition.
- Adoption will raise practical, legal and economic challenges. The progressive implementation period of 3-5 years is not feasible. It is not clear how this effort will be retributed, particularly to small cane growers, which constantly face many difficulties to produce.

It is strongly suggested and requested to maintain the scope for the indicators requiring progressive implementation only to the area within the scope of certification. The standard must guarantee that it is balanced, rational and fair with all stakeholders, including sugar mills and producers. Many raised that even with progressive implementation, it does not resolve the concerns repeatedly raised about practical, legal and economic implications, making it impossible for many to maintain certification. Noting that "the operator must implement these policies and practices in the certification unit and they must do so progressively throughout the supply area," the word progressively does not clarify the period of time, nor the degree of implementation. Requesting a progressive implementation leaves a very open understanding, where one can go from informing or managing directly with established goals and deadlines, but the latter is not feasible since in many instances, the operator does not have direct control over what happens in the farms or supply areas. Participants felt that it is impossible to produce results from something that the operator does not control directly.

Several points for clarification were also raised by participants:

- Why are other important issues such as soil health, GHG emissions, landscape/biodiversity stewardship, etc. not part of the indicators requiring progressive improvement?
- What is meant by "substantial progress in the TBPIP"? Is it 30%, 50%, 80%? That should be made clearer.

- Is there a maximum period of time given to cover the entire supply area? A note should also be included indicating that the operator can adjust its objectives and deadlines defined in the TBPIP, since third-party producers face challenges in terms of influence, resources, etc.
- The progression to cover the entire sugarcane supply area is very subjective. Ideally there should be clear metrics of the expectation of progression over time.
- For operators that have several certified units, can a macro plan be drawn up or should a plan be drawn up per certified unit? Note that many of the actions are managed in a corporate way (centralised management).

In order to meet the stipulation for unit of certification to comprise the entire cane supplying area (Certification Protocol 4.1.1), and to do so in a time-limited frame (Code of Conduct, XX), the Bonsucro Production Standard vX requires operators to develop a timebound progressive implementation plan (TBPIP) for meeting the requirements in the production standard where the scope specifies applicability to entire cane supplying area.

The TBPIP is challenging, i.e. with a time scale that is as short as possible, taking into account the specific circumstances of the cane supply area (e.g. number of independent smallholders).

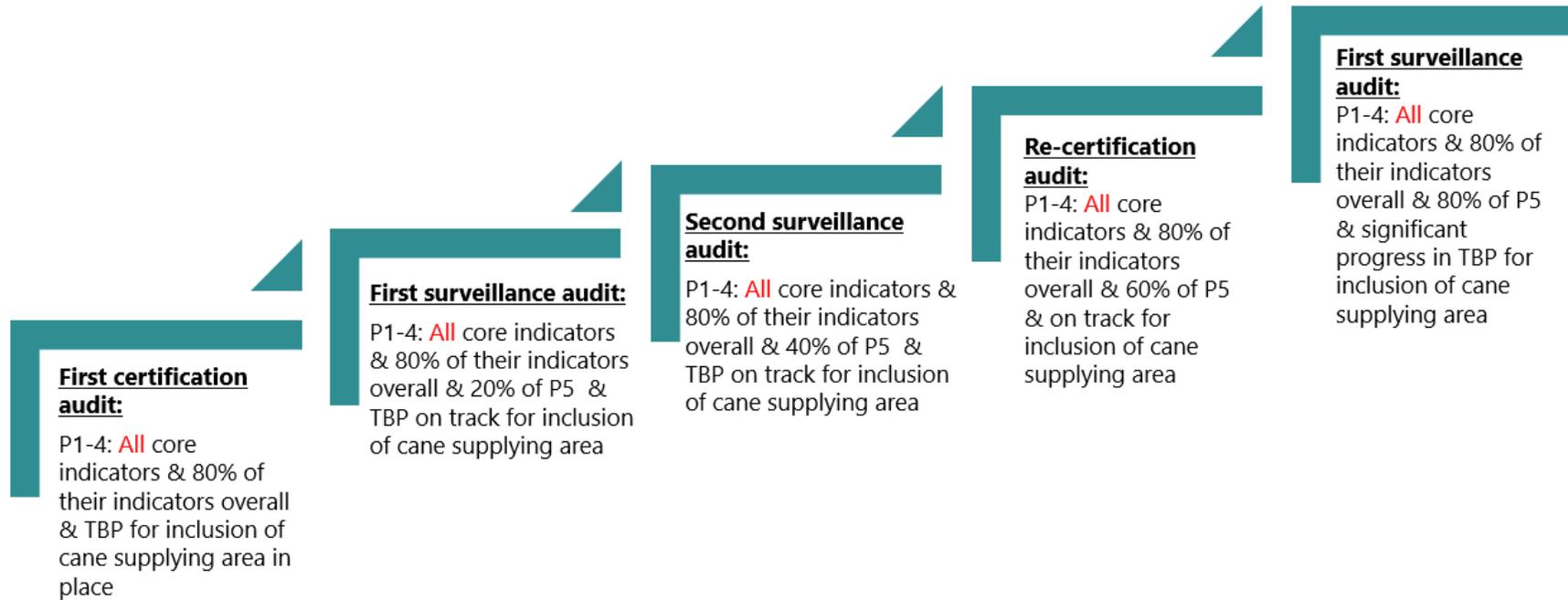
As part of the TBPIP development, the operator implements measures and controls progressively, prioritising the highest risk issues and areas to be addressed first.

For third party suppliers, i.e. for parts of the cane supplying area where the operator has no direct jurisdiction, progress with the TBPIP will be evaluated during the audits, i.e. whether measures were implemented as scheduled. The audit will not evaluate compliance with the corresponding requirements by third party suppliers, but only whether the operator carried out the measures of the TBPIP concerning these requirements.

Non-Conformities with TBPIP implementation are raised as follows:

- Isolated lapses in implementation of time bound plan: CBs to issue a minor non-compliance
- Evidence of fundamental failure to proceed with implementation of the plan: CBs to issue a major non-compliance

See graphic illustration below detailing compliance with this standard and TBPIP:



**Guidance for Timebound Progressive Implementation Plan (TBPIP):**

**What should a TBPIP include?**

The actions required to deliver the TBPIP will vary for each company. However, there are common types of actions and elements that should be included in all plans.

### **Scope**

The TBPIP should cover the company's whole cane supply area, i.e. own operations, including joint ventures, all direct and indirect suppliers, and all sourcing areas. This should be the same scope as the sustainability policies (see indicator 1.1.1). A company may have more than one plan as long as these are all aligned and linked to each other. For example, a company that owns mills and plantations but also buys from third party suppliers may want to have separate plans for their own operations and their third-party supply base.

The plan should also cover all the commitments made in the sustainability policies (e.g. environmental protection, respect for human and labour rights, ensuring Free, Prior, Informed Consent, etc.).

### **Actions**

The TBPIP should clearly list and explain the actions the company will take. The type and scale of actions will depend on:

- **Company size and resources:** Large companies will have more responsibility and resources.
- **Amount of sugar cane:** If the supplier is responsible for a large proportion sugar cane produced there is greater responsibility towards it as potential negative impacts could affect a larger area/number of people.
- **Footprint:** If a company is linked to large areas of land with potential environmental and social risks it has a greater responsibility in terms of the actions it must take.
- **Position in the supply chain:** The company will need to work directly with producers and primary aggregators to understand current practices and address gaps where commitments are not being met.

### **Targets, timelines and KPIs**

As written in the name, the TBPIP should be progressive, but also timebound with clear target dates for completing different actions as well as a final date for delivering on commitments. The company should also develop some Key Performance Indicators (KPIs) for regularly measuring progress.

### **Resources and responsibilities**

The TBPIP should include who in the company will take on responsibility for delivering on different actions and how resources will be allocated. Assigning responsibilities will ensure there is accountability for implementing and the plan. In some cases, it can be worth incorporating the targets set in the plan as part of the personal performance targets for relevant staff members to ensure they take ownership. Sufficient human and financial resources for implementing the plan must be allocated.

For actions regarding third-party suppliers, it is usually crucial for procurement teams/mill liaison staff to be involved and even take the lead, as they are in charge of managing supplier relations and selecting new suppliers, and as such often have a longstanding good business relationship with the suppliers. The procurement team also has more leverage/influence over suppliers, which may help to motivate them to engage in these new activities.

### **Regular review**

The company should regularly review (on an annual basis) the implementation of plans in practice and assess if the actions and timelines set are working and are delivering the expected/desired outcomes. If it is found that some actions are not effective the TBPIP should be revised and updated.

**PRINCIPLE 1 - ASSESS AND MANAGE ENVIRONMENTAL, SOCIAL & HUMAN RIGHTS RISKS**

<b>CRITERION</b>	<b>1.1 – Leadership demonstrated through elaboration and implementation of sustainability policies</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<p><b>Summary comments - Indicator 1.1.1</b>          High number of comments received for this indicator. Over half of the participants felt that the requirements should be made clearer. Some participants also raised concerns about the challenges to implement this indicator and many participants requested that the scope be limited to the certified unit rather than the whole supply area. Even with progressive implementation, it does not resolve the concerns repeatedly raised about practical, legal and economic implications, making it impossible for many to maintain certification. It is not clear the word progressively, in what period of time, nor the degree of implementation. Smaller mills will not have the resources to do this and it is difficult to include all producers within scope. The standard needs to align with national implementation on certification.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- This indicator should only cover the unit of certification.</li> <li>- Needs to have senior management (governance) involvement in policies implemented, how they will be audited, and applied to whom.</li> <li>- Clarification needed on what is determined as policy (document, practices, etc.)</li> <li>- Adjust the level of requirement of the indicators that are applied to the supplier</li> <li>- To clarify: Is the operator's commitment extended and mandatory to suppliers and customers?</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- More clarity on important definitions and terms used throughout the standard: extensive and progressive implementation.</li> <li>- More clarity on social dialogue (social organizations should be independent and neutral) and work orders (regarding indigenous people rights)</li> <li>- Provide example of social dialogue in the context of IPLC - meetings with community representatives, open event for discussion of topics of community interest.</li> <li>- Determine what will be accepted as policy (document, practices, etc.)</li> <li>- Make the policies and statement publicly available to improve dialogue and stakeholders involvement.</li> <li>- Clarify how it can be shown that policies are implemented in supply area – evidence based, internal audit?</li> <li>- Clarify how or which part of the Guidance should auditors apply</li> </ul>

				- Learn and review other cases: Costa Rica, the Organic Law of Agriculture and Sugar Cane Industry.
1.1.1 Sustainability policies are in place.	Mill Agriculture  CORE INDICATOR  Whole cane supplying area	Yes	<p>In line with the scope of application and content of the Bonsucro Production Standard, the operator has policies or work orders in place to respect:</p> <ul style="list-style-type: none"> <li>● human rights (including anti-harassment and non-discrimination),</li> <li>● indigenous peoples' rights, community engagement and land rights</li> <li>● labour rights,</li> <li>● occupational health and safety,</li> <li>● environmental protection,</li> <li>● Anti-Corruption/Anti-Bribery/money laundering,</li> <li>● Ethical conduct</li> <li>● Social dialogue</li> </ul> <p>The operator implements these policies and practices in the unit of certification and progressively implements these in the whole cane supplying area. The operator's commitment is made available to personnel, suppliers, clients and other stakeholders, with a legitimate interest duly demonstrated. The policies clearly state that respect for these values is an active duty involving ongoing due diligence of actual and potential impacts.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<b>CRITERION</b>	<b>1.2 Risks and impacts are systematically assessed</b>			
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>	
<b>Summary comments - Indicator 1.2.1</b> No significant pushback. Majority of comments are on clarifying terms and suggestions for alternative text. Several participants requested that the indicator specifically include the identification of real and potential risks that may lead to an impact on the human rights of vulnerable groups.				

	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Establish a commitment with (possible) affected stakeholders besides the identification and prioritization.</li> <li>- Clarify what should be included in the identification, prioritization and engagement plan</li> <li>- Clarify the coverage of this indicator for the entire area of sugarcane supply - Would it be for all suppliers? Does it also include service providers? Who's the target audience?</li> <li>- Reconsider the requirement to revise the plan annually as stakeholders do not change that frequently.</li> <li>- Clarify that the stakeholder groups listed are examples i.e. should be taken into account, however the plan should be consistent with the realities/conditions at each site. Not all stakeholders are relevant all operators</li> <li>- Suggestion for text: "The operator has a plan to identify, prioritize and engage with affected or" potentially affected "stakeholders, according to its risk identification analysis." Prioritization and commitment must be established with the affected stakeholders or those that are "potentially affected" based on the risk identification analysis.</li> <li>- Suggestion for text: remove "prioritization" from the indicator – i.e. "The operator has a plan for identifying and engaging with stakeholders and affected parties (i.e., internal, external, directly or indirectly impacted), including..."</li> </ul>	<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Provide a definition for "indigenous, tribal and traditional communities"</li> <li>- Provide clear criterion on what would be indicators of a good, free and informed consultation, in addition to establishing examples of the agreements that could be reached.</li> <li>- Consider the national context (for countries where many of the requirements would be in the law)</li> <li>- Include the identification of real and potential risks that may lead to an impact on the human rights of vulnerable groups</li> <li>- The identification of interested parties should be based on the ISO 9001:2015 standard. The identification of groups must be progressive in the general risk matrices.</li> </ul>	
<p>1.2.1 Mapping of Internal, External, and Vulnerable Stakeholders is conducted.</p>	<p>Mill Agriculture  CORE INDICATOR</p>	<p>Yes</p>	<p>The operator has an identification, prioritization and engagement plan with interested and affected parties (i.e. internal, external, directly, indirectly impacted), including:</p> <ul style="list-style-type: none"> <li>● women and children</li> <li>● migrant workers</li> <li>● Contracted workers</li> </ul>

(former 1.1.2)			<ul style="list-style-type: none"> <li>• indigenous, tribal and traditional communities</li> <li>• economically, socially, culturally or politically vulnerable stakeholders</li> </ul> <p>The plan is revised at least annually.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 1.2.2</b></p> <p>Strong pushback by participants. Majority of the participants felt that it is impossible to implement the indicator throughout the supply area. It represents multiple practical, legal and economic challenges. It is also a strong disincentive for operators to maintain Bonsucro certification as there is little or no price differentiation. The operators have little to no control over the producers/farmers who are independent natural or legal persons covered by a country's legal framework that does not allow direct interference by the mills. Thus, the participants felt that the indicator is impossible to implement for the entire supply area.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Implementation must align with national policies and the scope cannot include the entire supply area</li> <li>- Clarify the parties to whom the summary of the risk and impact assessment must be provided</li> <li>- The risk summary provision should be shared only if required by a party with a legitimate interest. The operator must have the power to assess the legitimacy of the interested party and determine whether it is appropriate to make the information available to them due to the business risks of sharing confidential information.</li> <li>- Include regular review of the company processes and activities</li> <li>- No clarity when including a business context analysis</li> <li>- Question: Is the social and environmental risk analysis only for new areas or should be undertaken for existing areas as well?</li> </ul>	<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Clarify the meaning of 'legitimate' and how it will be determined.</li> <li>- Strengthen policies that can reduce human rights violations</li> <li>- The guidance should have documentary support (records) for company processes</li> <li>- Dialogue with stakeholders is important but can be sensitive/contentious and in certain circumstances lead to misunderstandings and other business risks. In such cases, non-communication with stakeholders is sometimes the best option.</li> <li>- Remove the business context analysis from risk and impact assessment</li> <li>- For ongoing operations, there is a need to go beyond consultations and monitor the interaction of the operator with the different interested parties. Only consider the consultations when it comes to new projects.</li> <li>- To include "create management system to identify opportunities to improve impacts in the cane supply area and document improvements based on the risk and opportunities assessment" (<i>Note: it is not clear where in the guidance text this comment refers to</i>)</li> </ul>	

<p>1.2.2 Risk and Impact Assessment are conducted.</p> <p>(former 1.1.4)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>Yes</p>	<p>The operator has in place a Risk and Impact Assessment that includes</p> <p>(1) A social and environmental risk analysis &amp;</p> <p>(2) An identification of impacts (potential and actual)</p> <p>(3) A business context analysis</p> <p>A summary is made available to personnel, suppliers, clients and other parties who have a duly demonstrated legitimate interest.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>CRITERION</b></p>	<p><b>1.3 – The implementation of the Sustainability system is systematical and risk based</b></p>		
<p><b>INDICATOR</b></p>	<p><b>Scope</b></p>	<p><b>Standard</b></p>	<p><b>Full indicator wording</b></p>
<p><b>Summary comments - Indicator 1.3.1</b></p> <p>Majority of participants are requesting to limit the scope to the unit of certification for many of the same reasons highlighted in the earlier indicators – high costs and the inability of the operators to interfere with the operations of the farmers/producers.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- The indicator should only apply to the unit of certification or allow the operator to define the time it will take to implement it in the entire supply area.</li> <li>- Does not cater to established, mature, modern, highly mechanised industry reliant on private farmers. To expect the operator to have reach across the whole cane supplying area is unrealistic in such an environment.</li> <li>- The implementation of mitigation measures by suppliers cannot be guaranteed. Actions that mitigate risks can be promoted by the operator, but compliance cannot be the operator’s responsibility.</li> <li>- Align this with 1.2.2 (formerly 1.1.4)</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- To ensure effective compliance, the operator should raise awareness on the importance of stakeholder involvement, risk management and social dialogue</li> <li>- To align with country context (Australia)</li> <li>- To add "identify opportunities to create value and regenerate the farmland ecosystem while improving the economic and social performance of the mill and farm areas" (<i>Note: it is not clear where in the guidance text this comment refers to</i>)</li> <li>- Replace to: Operators should develop and implement measures to mitigate the greatest risks identified in risk and impact assessment (1.2.2) and to implement the remainder of the Bonsucro Production Standard.</li> <li>- Since the impact studies are confidential, information of those evaluated cannot be shared as required by the standard - Environmental and Social Impact Studies is regulated by the Ministry of the Environment of each country (as established under Rio Convention principle 17)</li> </ul>

1.3.1 Management Plans are developed and Implemented.  (partially former 1.2.3)	Mill Agriculture  CORE INDICATOR  Whole cane supplying area	Yes	<p>The operators shall develop and implement mitigative measures to counteract the highest risks identified in the risk and impact assessment (1.1.4) and to implement the rests of the Bonsucro Production Standard.</p> <p>The operator demonstrates that adequate resources and competent personnel are allocated to manage identified risks.</p> <p>Priorities will be given to control the highest risks identified related to indicators of the Bonsucro Production Standard in the unit of certification and work progressively enact actions that will seeks to mitigate in the whole cane supplying area.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 1.3.2</b>			
No strong pushback. Majority of comments are on improving clarity and the need to carry this out with the persons responsible for the processes and activities			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Clarify the baseline of the standard to be implemented to avoid constant modifications without taking into account the processes and Technical Standards or Certifications that have been adopted</li> <li>- Clarify what is meant by standard operating procedures, due to the difference between the laws of each country.</li> <li>- Add more description to the indicator</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- It should be carried out with those in charge of the processes and with those responsible for the activities impacted by new procedures ensuring a proper evaluation of occupational and labour risks</li> <li>- Provide template for plan preparation</li> </ul>
1.3.2 Standard Operating Procedures are developed.	Mill Agriculture	Yes	<p>The operator develops and implements Standard Operating Procedures (SOP) for all activities of the operation within the unit of certification.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 1.3.3</b>			

Majority of comments are on the need for making the applicable regulations public to enable stakeholder monitoring and the need for alignment with national laws as there are legal concerns about going above and beyond the regulatory requirement especially when applied to third parties.

	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify what 'system' the indicator refers to. If it is a management system, then the description should specify as such.</li> <li>- Clarify the scope of the indicator on "applicable laws, international conventions, commitments, rights and other requirements referred to in this standard."</li> <li>- It is not feasible to carry out legal due diligence of all the groups mentioned. Since a risk and context analysis will be carried out, not all service providers present a risk and auditing everyone is extremely costly. If there really is a legal audit with all the topics mentioned in the standard, it must be done progressively since it requires a cultural change and great investment, and therefore a longer time for implementation. <i>(Note: confusion between legal due diligence and legal audit?)</i></li> </ul>	<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- The operator must make public the applicable regulations so that stakeholders can contribute to the monitoring of compliance</li> <li>- Remove the need for the operator to have audit systems for the farmers. It is not applicable to the size of the business. <i>(Note: participant thinks that the legal due diligence also applies to farmers)</i></li> <li>- Align the indicator with national laws and regulations – forcing 3<sup>rd</sup> parties to go beyond legal compliance may cause the operator to face problems and legal claims before the national authorities</li> </ul>
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1.3.3 - Systems in place to demonstrate compliance with applicable laws, international conventions, commitments, rights & other requirements.  (former 1.2.1)	Mill Agriculture  CORE INDICATOR	Yes	<p>The operator has a documented system in place to identify, update track &amp; promote compliance with applicable laws, commitments, rights and requirements. The operator also lists and provides evidence for legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. <i>For further information, see <a href="#">Guidance</a>.</i></p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
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**Summary comments - Indicator 1.3.4**  
 Very strong pushback from industry but supported by civil society.  
 Comments that do not support this indicator include the request to limit it to demonstration of legal use of land rather than FPIC with community. Many comments also on providing clarity to the indicator text and guidance.

	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- To align with country policy and laws - the current recognized mechanism in some countries is only consultation and not a legal consent. The application of FPIC even for land that is already in could have legal implications for most of the mills.</li> <li>- Define what it means to 'diminish'</li> <li>- Clarify how far back in history does this indicator go</li> <li>- Not relevant for Australia</li> <li>- It is neither possible nor practical to consult the communities to obtain permission to plant new areas in Costa Rica where it has legislation on land use to grant planting in new areas.</li> <li>- It is not possible to conduct public consultation each time a new area is planted, what matters is the legality of land use which should be addressed to the national authority and not through community consultation.</li> <li>- Remove the indicator or reformulate completely</li> <li>- Suggest rewording the indicator: "The use of land and resources does not undermine the rights of other users without their free, prior and informed consent."</li> <li>- Suggest rewording the indicator description: "There are documents that show the identification and evaluation of demonstrable legal, customary and user rights. In accordance with current legislation, free, prior and informed consent is obtained after a comprehensive process as detailed in the guidance."</li> <li>- Establishing an FPIC mechanism should be supported by national policy and regulations</li> <li>- Community must be involved</li> <li>- Remove the producers' farms from scope</li> <li>- The indicator should be replaced by the demonstration of the right and legality of land use.</li> </ul>	<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Community complaints about these issues should be taken into account and addressed based on indicator 1.1.1.1.</li> <li>- Clarify the timeline for the process.</li> <li>- Clarify when FPIC should be requested and how frequent - when there are areas of expansion, new business, or land conflict going on. In areas where there is no conflict or new developments, can it be understood that FPIC is not necessary?</li> <li>- Indicate the frequency in which these groups give this consent.</li> <li>- Documents are available that show the identification and assessment of demonstrable legal, customary and user rights. In accordance with current legislation, free, prior and informed consent is obtained after a comprehensive process as detailed in the guide.</li> </ul>
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1.3.4 Use of land and resources does not diminish rights of other users without their FPIC.	Mill and Agriculture	No	Documents showing identification and assessment of demonstrable legal, customary and user rights are available. Free prior and informed consent (FPIC) is obtained following a comprehensive process as detailed in the guidance. <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 1.3.5</b>			
	<b>Indicator:</b> None		<b>Guidance:</b> - Involve producer associations to ensure greater transparency on this issue, including suppliers of inputs (goods and services) for the different production processes and the operator's management.
1.3.5 Payment for cane deliveries are made according to agreed contract.  (former 1.2.2)	Mill Agriculture  CORE INDICATOR	Yes	Payment shall be made according to contractual agreement (including value and timing of payment).  <i>For further information, see <b>Guidance tbd</b>.</i>
<b>Summary comments - Indicator 1.3.6</b>			
Concerns raised mainly around legal restrictions on supply agreement. For instance, in Brazilian regulatory context, the supply contract does not guarantee the buyer (operator) the right of interference in the ownership of the sugarcane supplier. The inclusion of clauses attributing interference stake in sugarcane cultivation in the supplier's area may have relevant tax consequences. Participants request that criteria/indicators must be in accordance with the law - any additionalities defined in the indicator (provision of a commitment of the supplier with the current legislation, for example) cannot impose on the operator additional responsibility for the implementation by the supplier.			
	<b>Indicator:</b> - Suggestion: Change to "Cane supply contracts contain sustainability requirements in compliance with the Bonsucro standard" - This indicator is only relevant to non-mechanised situation. - This indicator is not applicable for the entire supply area. - It is not clear in the standard or in the guide whether it applies to areas outside the unit of certification		<b>Guidance:</b> - The contracts should include a compliance evaluation of workers' rights, employment contracts, remuneration, working hours, overtime pay, social security and other legal benefits or those included in collective bargaining agreements. - Provide guidance in situations where this indicator is not relevant (e.g. when highly mechanised) so that end-users and auditors know what to focus on and invest in to maximise benefit.

	<ul style="list-style-type: none"> <li>- Add "provision of health services in sufficient quantity and with the necessary supplies"</li> <li>- This indicator must be in accordance with current country legal requirements and regulations – depending on the country’s regulatory framework, operators are limited in the type of clauses they can include in a supply contract and the ability to impose on the supplier to comply</li> <li>- These terms should not be contained in legal contracts, but rather a code of ethics for suppliers. Modification suggestion: “The Operator must guarantee that the cane suppliers sign their adherence and commitment to the Supplier Code of Ethics”</li> </ul>		<ul style="list-style-type: none"> <li>- Ensure good access to sanitary services for workers e.g. separate hygiene facilities (toilets) for men and women with provision of sanitation supplies (toilet paper, soap, paper towels)</li> </ul>
1.3.6 Cane supply contracts contain sustainability requirements.  (former 1.2.2)	Mill	Yes	<p>The operator ensures that cane supply agreements contain requirements geared towards worker and environmental protections (e.g. provision of water to cane cutters, provision of PPE, provision of sanitary services).</p> <p>The operator establishes a control system to measure and monitor supplier compliance with the requirements in the cane supply agreements.</p> <p><i>For further information, see <a href="#">Guidance</a></i></p>
<b>CRITERION</b>	<b>1.4 – Systems for Monitoring and Evaluation (M&amp;E) and Grievances are implemented.</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<p><b>Summary comments - Indicator 1.4.1</b></p> <p>Main pushback is on the application of this indicator to the whole supply base and the high cost and practical challenges it brings. Such challenges cannot be resolved with progressive implementation.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- This indicator should be limited for unit of certification only not the entire supply area.</li> </ul>		<p><b>Guidance:</b></p> <p>None</p>

	<ul style="list-style-type: none"> <li>- This should be a core indicator.</li> <li>- Clarify how the management review should be conducted.</li> <li>- Do the requirements to be addressed in internal auditing in areas outside the scope of certification refer to all requirements of the standard?</li> </ul>		<ul style="list-style-type: none"> <li>- The companies should set up a committee for the application of the management system standards, similar to the Joint Commissions on Occupational Safety, and take into account the evaluations of these teams.</li> </ul>
<p>1.4.1 Monitoring mechanisms are in place to ensure that corrective actions are implemented, and management review conducted.</p> <p>(former 1.2.4)</p>	<p>Mill Agriculture</p> <p>Whole cane supplying area</p>	<p>Yes</p>	<p>The organisation conducts an annual internal audit to determine whether the organisation.</p> <ul style="list-style-type: none"> <li>- Conforms to the requirements in the Bonsucro Production Standard</li> <li>- Effectively implements and maintains the standard requirements within its organisation, i.e., implements all actions as stipulated in the various procedures (see 1.3.1 SOP) and management plans (see 4.1.X BMP, ....)</li> </ul> <p>The organisation maintains the internal audit records and reports.</p> <p>The internal audit is conducted in the unit of certification and the operator works progressively to include the entire cane supplying.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 1.4.2</b></p> <p>Main concern raised for this indicator lies in two areas – firstly, the potential conflict with national legislation and secondly on the scope of the whole supply base where the operator has no legal jurisdiction. On potential legal conflict, one example is provided for Guatemala – “It is necessary to analyze the feasibility of meeting the criterion in two ways: 1) The operator has already managed to meet the indicator in the sense of complying with court decisions, whether favourable or not; 2) The operator is unable to comply with the obligation to compensate the communities that may be harmed by the judicial decisions, as this would reduce legal certainty to them and to the jurisdictional function exclusively held by the jurisdictional bodies. Therefore, it can be considered unconstitutional in light of article 203 of the Political Constitution of the Republic of Guatemala.” Many participants felt that conflict resolution should go through judicial means so as not to come into conflict with national institutions that have authority to settle conflicts over the use of water and land. Acting outside of this process may be a violation of national legislation and represents a risk for the company. For Guatemala, for example, there is no regulation related to the implementation of ILO Convention 169. In Nicaragua there is the National Water Authority, which is responsible for regulating and granting titles for use. As an operator or user of resource,</p>			

responsibility must be to comply with current legislation. There was also a concern that the process for conflict resolution as described in the guidance may generate a perverse incentive for other to raise malicious complaints to harm the company. On the second concern which is on scope, many participants felt that it should be limited to the certified area as they have no control over the areas outside their direct management. There are also several comments requesting that the operator must keep a public record of active litigation and the way in which previous litigation has been resolved, applying the lessons learned in each that support the sustainability of the business.

	<b>Indicator:</b>	<ul style="list-style-type: none"> <li>- This indicator should be limited for unit of certification only not the entire supply area.</li> <li>- The indicator should be adjusted to country regulations and law.</li> <li>- Clarify how this criterion will be evaluated for the entire area of sugarcane supply - which documents should be presented? In the case of non-conformities in areas that the operator does not manage, will this impact on the certification of the production unit? The inclusion of new suppliers is quite common, making it impossible in some cases to adapt to this criterion immediately, thus it is more practical to evaluate the methodology that the operator uses to monitor these suppliers.</li> <li>- Suggestion to add: The operator acts toward the transparent and definitive settling of the dispute.....</li> <li>- The judicial and non-judicial are recognized by international processes</li> </ul>	<b>Guidance:</b>
			<ul style="list-style-type: none"> <li>- Operator should maintain public record on past and active disputes.</li> <li>- The independence and separability that the suppliers have from the contracting parties (i.e. the operator) in how they present and defend any legal actions initiated against them must be respected.</li> </ul>

1.4.2 Land & water claims that are legitimately contested by other users.  (former 1.1.3)	Mill Agriculture  CORE INDICATOR  Whole cane supplying area	0 ha & 0 / m3	<p>The operator which is involved in legal action, either as claimant or defendant, takes appropriate actions to resolve the conflict. The operator resolves and conforms to any justice court case, court rulings, or appeals.</p> <p>The operator acts toward the definitive settling of the dispute using recognized judicial and/or non-judicial mechanisms.</p> <p>Claims against land and water are applicable to the entirety of the cane supplying area (mill) or production area (farms), irrespective of inclusion in the unit of certification.</p> <p>The operator works progressively to include (and/or check) the entire cane supplying area.</p>
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			<p>For further information, see <a href="#">Guidance</a>.</p>
<p><b>Summary comments - Indicator 1.4.3</b>          Participants request that the procedures are simple, accessible and clearly explained to the communities of interest. System and records should be made public. Some extra guidance and clarification needed for this indicator.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- The indicator reduces legal certainty to said resolutions by attributing responsibilities to the operator that can only be established by the jurisdictional bodies.</li> <li>- Remove the requirement that the system be a conflict resolution "mutually agreed upon" because this means that with each case a new method has to be sought without the possibility of maintaining a standard. Suggest to only require compliance with the UNGPs.</li> <li>- The claim (by the complainant) should have legal support.</li> <li>- Analyze the establishment of a Mechanism for the resolution of conflicts that complies with the UNGPs and the risk that it can be misused to generate conflict. The mechanism should include the main characteristics to be fulfilled, without being prescriptive in the implementation – taking note of cultural and managerial differences according to the cultural, political and social context. There are organizational structures within the communities, with which there is a complaint mechanism for community incidents, which has obtained positive results. The scope requested by the Standard, with UNGOs, would not be in accordance with the level of development of the different countries.</li> <li>- To delete "The system allows claimants to choose individuals or groups to support them and/or act as observers".</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- The system is publicized, explained and tested with the communities of interest. The procedures are simple and affordable. There is a public registry for consultation on the status of complaints and a list of improvement projects derived from complaints filed based on stakeholder interests.</li> <li>- Provide a content model for the complaint mechanism</li> <li>- Clarify how this criterion will be evaluated for the entire area of sugarcane supply - which documents should be presented? In the case of non-conformities in areas that the operator does not manage, will this impact on the certification of the production unit? The inclusion of new suppliers is quite common, making it impossible in some cases to adapt to this criterion immediately, thus it is more practical to evaluate the methodology that the operator uses to monitor these suppliers.</li> </ul>

<p>1.4.3 Grievance mechanism for communities is in place.</p> <p>(former 1.1.3)</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p>To ensure that affected stakeholders have access to processes that address their grievances, the operator has in place a mutually agreed on and documented grievance mechanism that meets the expectations laid out in the UN Guiding Principles for Business and Human Rights: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement. In practice it meets the following:</p> <ul style="list-style-type: none"> <li>- It ensures anonymity of complainants were requested by complainants, protecting them from risk of reprisal or intimidation. It also safeguards against non-disclosure rules set by the company.</li> <li>- Procedures are in place to ensure that the system is effectively communicated to and understood by the affected parties, including by illiterate parties or workers whose native language is not the operation's language.</li> <li>- The operator keeps parties to a grievance informed of its progress, timeframe and outcomes.</li> <li>- The system allows for complainants to choose individuals or groups to support them and/or act as observers.</li> </ul> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
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## PRINCIPLE 2 - RESPECT LABOUR RIGHTS & OCCUPATIONAL SAFETY AND HEALTH STANDARDS

CRITERION	2.1 To provide a safe and healthy working environment in workplace operations		
INDICATOR	Scope	Standard	Full indicator wording
<b>Summary comments - Indicator 2.1.1</b> No strong pushback. Most comments are on clarification			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- This indicator should also ensure that health and safety hazards and risks are addressed, prevented, and redressed.</li> <li>- The indicator should be applicable to country laws and regulations (raised specifically in the context of Australia where workers are private farmers and regulations are already quite stringent)</li> <li>- Replace “Employees” with "Direct and Indirect Workers"</li> <li>- The health and safety assessment for each employee must be adapted according to the type of work and work activities.</li> <li>- Clarify whether PPRA, PCMSO, ASO, PPE Form meets the indicator for Brazil.</li> <li>- The indicator should be applied for at least 96%</li> <li>- Suggestion to reword: “Applies to all employees on plant premises and farms included in the certification unit. Health and Safety Assessments comply with relevant standards (legislation, policy and best practices) in order to mitigate risks.”</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- How will we verify that mental health issues are properly assessed, addressed and redressed?</li> <li>- The evaluation should be carried out periodically at each harvest, by work area and work position, in order to incorporate changing conditions into the occupational risk map including the measures adopted in response to the changes identified.</li> <li>- Clarify the definition of 'worker' (asked in terms of application in the Australian context)</li> <li>- Include clarification of problems “as a result of work”.</li> <li>- Clarify and define the scope of medical examinations. The difference between the pre-occupational examination and the medical examination is not clear.</li> <li>- Clarify if there is a difference between “survey” and “evaluation”.</li> <li>- Suggestion to reword: When assessing the risk of heat stress, operators should observe local heat legislation.'</li> </ul>
	2.1.1. Main health and safety hazards	Mill Agriculture	Yes

<p>and risks are identified, documented, assessed, communicated to workers, and mitigated.</p>	<p>CORE INDICATOR</p>		<p>employment does not jeopardize the health or safety of employees. Health and safety hazards and risks will be assessed with regards to occupational risks (e.g. ergonomics, work-related injury and work-related accidents, fatigue, workload), environmental risks (e.g. heat stress, altitude sickness) and pre-existing medical (e.g. declining kidney function, HIV/AIDS seropositivity), and mental and cognitive health issues (e.g. PTSD from victimisation/harassment; cognitive capabilities affecting attention/comprehension). Assessment is ongoing/repeated to incorporate changing conditions (e.g. infectious agents, emerging vector-borne illnesses and injuries) and implements responsive and evolving mitigation measures.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 2.1.2</b></p>			
<p>No strong pushback. Most comments on improving clarity and guidance. One concern raised from Australia on the applicability of indicator when the private farmer is the worker.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify whether the indicator focus is to manage risks or prevent accidents, or both.</li> <li>- Include "all workers - direct and outsourced workers - on the premises.....".</li> <li>- Clarify how to enforce the plan on private independent farmers who have their own individual legal obligations in relation to these issues</li> <li>- Not applicable in countries where the government regulates the number of working hours e.g. Costa Rica. Suggest removing indicator</li> <li>- Clarify application of 'global best practices' which is a subjective concept</li> <li>- Replace 'workers' with 'employees'</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Risks should be managed and addressed to avoid health and safety issues.</li> <li>- Clarify the definition of 'worker' (asked in terms of application in the Australian context)</li> <li>- For mills, the evaluations are carried out during harvest time and incorporate the results in the risk map.</li> <li>- Replace 'employees' with 'direct and indirect workers' and apply across standard.</li> </ul>
<p>2.1.2 Health and safety risks are managed through implemented and enforced plans.</p>	<p>Mill Agriculture CORE INDICATOR</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Occupational, environmental and medical (including mental) health hazards/risks identified during screening through regular updating are managed in line with global best practice.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>

Summary comments - Indicator 2.1.3			
No strong pushback. Most comments on improving clarity and guidance.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Define close proximity within a mill and farm context.</li> <li>- Clarify how the indicator and guidance will be applied in an Australia context (<i>see related comments elsewhere</i>)</li> <li>- To add: in sufficient quantity and with the free provision of personal hygiene items. (<i>Comment did not specify what needs to be provided in sufficient quantity but likely to be water for sanitation, washing and cooling</i>)</li> <li>- Clarify that there must be facilities for both sexes “as long as there are workers of both sexes working”.</li> <li>- Clarify whether NR24 and NR31 in Brazil could meet this indicator. NR31 allows for unisex bathroom in some situations.</li> </ul>	<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Provide update and training on the subject</li> <li>- Replace “workers” with “employees”</li> <li>- Remove the requirement “A person should be appointed as responsible for the Water, Sanitation and Hygiene (WASH) safeguards.”</li> </ul>	
2.1.3 Right to water and sanitation safeguards are designed implemented and enforced.	Mill Agriculture  CORE INDICATOR	100%	Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator provides, safe drinking water to all workers, in close proximity to where they work. Recommended water consumption will depend on heat exposure and workloads. The operator provides access to water for sanitation, hand washing, skin cooling as well as access to toilet facilities. Separate toilet facilities are provided to men and to women workers, unless unisex facilities are the cultural norm in the country. <i>For further information, see <a href="#">Guidance</a>.</i>
Summary comments - Indicator 2.1.4			
No strong pushback. Most comments on improving clarity and guidance. One concern raised from Australia on the applicability of indicator when the private farmer is the worker.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- To add: PPE should address the risks associated with each workstation.</li> <li>- The PPE must be periodically renewed</li> </ul>	<b>Guidance:</b> <ul style="list-style-type: none"> <li>- define the responsibility of the worker to take care of the PPE to a reasonable degree.</li> </ul>	

	<ul style="list-style-type: none"> <li>- Indicator not relevant in the Australian context where 'workers' are private farmers who have individual legal obligations in relation to health and safety.</li> <li>- Replace 'workers' with 'employees'.</li> </ul>	<ul style="list-style-type: none"> <li>- It is recommended to include recommendations of good practices, consulting workers who have experience in the use of PPE. It is recommended to renew them (the PPE) according to the technical specifications given by the manufacturers of these PPE.</li> <li>- To remove the requirement "Assign a responsible person in charge of maintenance and supply of PPE."</li> </ul>	
<p>2.1.4. Appropriate personal protective equipment supplied to and used by all workers free of charge.</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Required, approved and adequate PPE shall be issued for free to the workers and be in good condition. The operator shall train workers in the use of PPE. The operator shall implement a system to monitor the effective use of PPE.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 2.1.5</b></p> <p>No strong pushback. Most comments on improving clarity and guidance especially around training frequency and the percentage of workers that need to be trained. One concern raised from Australia on the applicability of indicator when the private farmer is the worker. Some concerns raised that the training frequency should be reduced due to the resources required and that the training should be based on actual needs rather than a threshold.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify whether a refresher course for staff has to be done every year (as in the indicator) or every 5 years (as in the guidance)</li> <li>- Add that training must be conducted during working hours. If not, overtime should be acknowledged to avoid unpaid working hours.</li> <li>- The training should be based on the need of the company.</li> <li>- The indicator is not relevant to Australia with private farmers who have individual legal obligations to health and safety.</li> <li>- The training frequency should be every 3 years, as annual refreshers are complicated and requires more resources (manpower).</li> <li>- Clarify the importance of the OHS training plan.</li> </ul>	<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Clarify if it is the training records that must be kept at least 5 years or it's the training frequency.</li> <li>- Involve outsourced workers in the training and drills.</li> <li>- Clarify how this will be applied in the Australian context.</li> <li>- Suggest amending: "All workers should take an annual refresher training (the frequency of training is provided for in the legislation)."</li> </ul>	

	<ul style="list-style-type: none"> <li>- The indicator should require annual training for 50% of employees or training every two years for 90% of the employees</li> <li>- The frequency of the training should be based the implementation on the ground. If necessary, the frequency can be increased.</li> <li>- Suggest amending: “All employees receive an update with a refresher training according to applicable Health &amp; Safety standards”.</li> </ul>		
2.1.5 Percentage of staff trained for health and safety at start and a refresher course at least every year.	Mill Agriculture	90%	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator ensures that all new workers receive an induction, which includes basic training on occupational health and safety instructions prior to beginning activities. The training includes the information about risks associated with activities performed by the workers.</p> <p>For workers starting a new job or taking on new activities, training associated to the specific health and safety risks associated to the new position or activity is provided.</p> <p>All workers receive an update with a refresher training at least every year or more frequently as determined by the H&amp;S management plan.</p> <p>Instructions on new issue-specific H&amp;S concerns are carried out as they emerge, e.g. on current issues like Covid.</p> <p>An OHS training plan is implemented progressively, including covering accident and work-related illness protocols.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 2.1.6</b> No strong pushback.			
	<b>Indicator:</b> Suggest to add: “.....for injured or ill persons to receive <u>emergency</u> professional medical treatment”		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Risk prevention should be instilled in workplaces</li> <li>- Require that records of incidents be kept to support risk prevention.</li> <li>- In relation to the sentence “Procedures should be developed through the engagement with trade</li> </ul>

			union/worker organisations, direct workers and indirect workers.....” – the procedures should be developed by technical persons, and it is not necessary for trade unions, and workers to be involved.
2.1.6 All workers have access to first aid and provision for emergency response.  (former 2.1.7)	Mill Agriculture  CORE INDICATOR	100%	Applies to all workers on the premises of the mill and farms included in the unit of certification. First aid supplies are available and checked, and dedicated personnel is trained to use them. Emergency response prevents the escalation of injury or illness and there shall be provision for injured or ill persons to receive professional medical treatment.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 2.1.7</b> No strong pushback. One concern raised regarding relevance of indicator measurement in Australia.			
	<b>Indicator:</b> - Clarify if indicator is applied to sole operators as it is not relevant in the Australian context. Private farmers are the sole operators and it is impossible to expect farmers to achieve a target based on a million hours worked (equal to 347 years of average work). - Replace ‘workers’ with ‘employees’		<b>Guidance:</b> - Periodic evaluations of the health and safety risks of workplaces should be carried out by the joint committees with the manager responsible and workers’ representatives - Keep records of incidents to support risk prevention. - Replace ‘workers’ with ‘employees’
2.1.7 Lost time accident frequency  (former 2.1.6)	Mill Agriculture	Mill <15; Agric <30 number per million hours worked	Applies to all workers on the premises of the mill and farms included in the unit of certification. A lost time accident is defined as an unexpected and unplanned event which results in a personal injury which causes the worker to be unable to carry on with his/her normal duties on the next day or next shift. Where a fatal injury occurs, this to be noted separately.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>CRITERION</b>	<b>2.2 To provide employees (including migrant, seasonal and other contract labour) with benefits and salary sufficient to achieve an adequate standard of living (former 2.3)</b>		

INDICATOR	Scope	Standard	Full indicator wording
<b>Summary comments - Indicator 2.2.1</b> No strong pushback			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- There is a legal regulatory framework that regulates the contracting mechanisms in each country and must be respected or may lead whoever requests it to problems and legal claims before the relevant national authorities.</li> <li>- Add that the indicator does not apply in cases of regular hiring of self-employed work.</li> <li>- Replace "workers" with "employees"</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Replace "workers" with "employees".</li> <li>- Include that the contracts should meet the requirements of local/national legislation and to apply the Bonsucro standard if such legislation is absent.</li> </ul>
2.2.1 Existence of a contract or equivalent document  (former 2.2.7)	Mill Agriculture  <b>CORE INDICATOR</b>	100 %	Applies to all workers on the premises of the mill and farms included in the unit of certification. All workers are provided with a contract or equivalent document (e.g. national working card), and are explained their rights and obligations. If not specified by the law the contract includes at least the following elements: hours of work, overtime hours and payment, notice, rest periods, holidays, parental/maternity/paternity leave, wages, mode of payment, and if legal, any deductions that will be made. A copy of the contract is provided to the worker and in their own language. The terms of these contracts are aligned with the parameters of this standard (e.g. maximum working hours and overtime).  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 2.2.2</b> Extremely strong pushback especially from countries where legal limits exceed the 60 hours per week. Reducing these working hours would negatively affect the mills and workers and it is strongly suggested by participants to maintain a maximum of 12 hours a day equivalent to 72 hours a week or according to the law of each country. Work in agribusiness is temporary in nature and the workers want to work longer hours as result. Some participants called for the removal of the indicator.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- The proposed a maximum of 60 hours per week is more restrictive than the national legal frameworks of some countries. This also contradicts the rights of workers based on national regulations.</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- To clarify how to manage the intensity of seasonal work during the harvest time and the workers expectations</li> <li>- To specify a weekly rest day.</li> </ul>

	<ul style="list-style-type: none"> <li>- Remove this indicator and establish one that is more aligned with country legislation. This is not applicable in Costa Rica, Brazil, Honduras and Guatemala. Costa Rica's labor law allows you to work longer hours. Sugar mill workers want to work longer hours because it is a temporary job and the hiring of more workers will considerably increase the social charges.</li> <li>- Maximum number of hours should be based on country legislation. Establishing a maximum of working hours is only applicable in those cases in which national legislation does not have provisions in this regard.</li> <li>- To ensure compliance with this indicator, BONSUCRO should propose a Formal Contract to ensure that the relevant employment aspects are clear. The auditor should also compare the payroll information and what the workers actually received.</li> <li>- The standard should be based on ILO Convention on plantations article 43: plantation workers shall, in the course of their work on plantations, have one day of rest per week comprising at least twenty-four consecutive hours consecutive</li> <li>- To replace workers with employees.</li> </ul>	<ul style="list-style-type: none"> <li>- More time is needed to progressively comply with this indicator.</li> <li>- To remove "In countries where the maximum work hours limit is higher than 60 hours, the Bonsucro Production Standard prevails."</li> </ul>	
<p>2.2.2 Maximum number of hours worked  (former 2.3.3)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	<p>60 Hrs / week with one weekly free day or 2 free days in 14 working days</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification.</p> <p>The operator shall ensure that working time does not exceed 60 hours (48h + 12h overtime) or safe legal working conditions (whichever is lower), averaged monthly. The maximum number of hours worked during a day does not exceed 12h. If local legislation allows for more hours worked, the operator demonstrates that circumstances are exceptional (c.f. guidance). There is a 3-to-5-year phase in for this indicator from initial certification.</p> <p>Each worker must have at least 1 day off every 7 days or 2 days off every 14 days worked.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 2.2.3</b></p> <p>Participants highlighted an inconsistency between the English and Spanish versions. Some comments are on the need to highlight that overtime work is voluntary and to align the indicator with ILO Convention on plantations article 43</p>			

	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- The standard should be based on ILO Convention on plantations article 43: plantation workers shall, in the course of their work on plantations, have one day of rest per week comprising at least twenty-four consecutive hours consecutive</li> <li>- Inconsistency between English and Spanish versions. It is proposed for the Spanish version: "It applies to all workers in the mill and farm facilities included in the unit of certification."</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- It should be adopted as a rule of labour relations that overtime is voluntary and that it occurs on an exceptional basis.</li> <li>- Replace workers with employees.</li> </ul>
2.2.3 Overtime is paid at a premium rate.  (former 2.3.4)	Mill Agriculture  CORE INDICATOR	>25%	Applies to all workers on the premises of the mill and the farms included in the unit of certification. Overtime work shall be voluntary and exceptional. Voluntary overtime hours are reflected in the employment/worker's contract and payroll documents are provided to present accurate information for all work performed, including overtime.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 2.2.4</b> No strong pushback but a few participants ask for improvements in wording to clarify the indicator. There is a comment that the indicator is no applicable in Costa Rica as the legal threshold there is higher. There is a general recommendation for Bonsucro to record the experiences where in-kind payment methods are carried out and conduct an analysis of the impacts of this measure on the quality of life of workers. Bonsucro should keep a public record of those organizations that pay above minimum wages as part of Collective Agreements and their impact on the productivity and competitiveness of operations and the well-being of workers.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Provide a rationale for the 30% threshold for in-kind forms of payment</li> <li>- Not applicable in Costa Rica where up to 50% of in-kind forms of payment is allowed</li> <li>- It should be adopted as a rule of labor relations that overtime is voluntary and that it occurs exceptionally. <i>(comment meant for 2.2.3)</i></li> <li>- Wording needs to be improved. In Brazil payment in cash means cash payment. The Brazilian Law allows the payment of the salary with money (kind) and also with other utilities (e.g. housing and food). In these situations, at least 30% of the salary must be paid in kind. Brazil law allows payment in cash (at least 30%) and with other utilities.</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- To replace workers with employees.</li> </ul>

<p>2.2.4 Ratio of lowest entry level wage including benefits to minimum wage and benefits required by law.</p> <p>(former 2.3.1)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	<p>≥1 \$/\$</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification.</p> <p>Minimum wage is paid as defined by legal requirement.</p> <p>If wages are negotiated voluntarily between employers and workers' organizations, those negotiated wage amount(s) apply to all workers covered under the negotiated agreement.</p> <p>In cases where the law permits in-kind forms of payments, these do not exceed 30% of the minimum wage.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 2.2.5</b></p> <p>As per 2.2.4, same concern raised on the applicability in Costa Rica and the general recommendation for Bonsucro to conduct an analysis of the impacts on the quality of life of workers. BONSUCRO should keep a public record of who pays above minimum wages as part of Collective Agreements and the impact on the productivity and competitiveness of operations and the well-being of workers.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Indicator should be removed. In Costa Rica, up to 50% of the salary can be paid in kind. In the case of disabilities, the full salary is not paid, since the worker receives a subsidy from institutions such as the Costa Rican Social Security Fund or the INS.</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Bonsucro must create spaces for inclusion from professional training activities, staff recruitment, social coexistence activities and its relationships with stakeholders, to promote values of inclusion and cooperation.</li> </ul>
<p>2.2.5 Minimum wage is guaranteed to piece rate paid workers.</p> <p>(former 2.3.2)</p>	<p>Mill Agriculture</p>	<p>≥1 \$/\$</p>	<p>CORE INDICATOR</p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification.</p> <p>Minimum wage is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on the proportion of the daily rate for minimum wage according to the hours worked (as covered in 2.2.4 and 2.2.2). If under these conditions, the piecework rate does not meet the minimum wage, then the wage level is upgraded to at least the minimum wage. No more than 30% of the required minimum wage is paid in-kind. Curtailed days (by management or due to workplace incidents/injuries) are compensated as a full day.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>

### Summary comments - Indicator 2.2.6

Very strong pushback. Many participants object to the requirement of “living wage” and prefer to maintain the requirement of “minimum wage”. Participants highlighted that minimum wages are implemented based on the different realities of each country and therefore implementing a “living wage” could threaten efforts of job formalization in the region.

Living wage is also not recognised by ILO and national legislations. Participants commented that the adoption of a figure lacking a legal basis, as a reference for salary compensation, would generate uncertainty and problems of a practical, technical and economic nature. They also questioned the use of the Anker & Anker methodology to define the living wage – “The solidity of the foundations on which this methodology is based, as well as the effects in terms of its use, is unknown”. The participants request that the Working Group and other decision makers in this process to carefully assess the impact that living wage figures may have on the future positioning of the certification. The request to remove the “living wage” indicator is re-emphasised.

#### Indicator:

- Living wage is not recognized by the International Labor Organization nor by the national legislations, which only recognize the concept of “minimum wage”
- This figure has no legal basis as it is not recognised in any ILO agreement or treaty. In contrast, the minimum wage is fully recognized by C095 - Agreement on the protection of wages / 1949, and in the case of Central American countries, it is also recognized by current national legislation
- Fully support inclusion of indicator
- Remove this indicator and maintain the payment of the minimum wage in accordance with national legislation.
- Social guarantees in Costa Rica considerably raise production costs. Equating the prevailing wage with the living wage makes it difficult to employ personnel in the sector.
- The issue of salary change and its percentage variation is not very viable
- Implementing a living wage commitment should be at the discretion of the company and the standard should not establish required percentages for closing gaps. To properly implement a gap closure, it requires a thorough analysis of its economic implications. This indicator does not respond to the economic implications of the company, nor does it ensure its economic and social sustainability

#### Guidance:

- Clarify the definition of living wage in different countries and regions, and supported by research
- The guidance should include: i) explicit mention that the plan to close the gap is discussed and elaborated in agreement with the workers and that ii) the plan covers direct and outsourced workers (including temporal workers and piece rate workers) working in the premises of the mill and the farms.
- Defining a living wage for each Central American country should be a contextualized task and not taken as a reference from a global database that has not standardized data with the competent legal authorities of each country.
- Consider negotiating the wage with the unions.
- Clarify where the main reference on living wage come from. It's not specifically mentioned in the [globallivingwage.org](http://globallivingwage.org).

				- A reference, such as Anker & Anker's, should not be used as a metric, since its periodic publication is not guaranteed.
2.2.6 Movement to close living wage gap  (former 2.3.5)	Mill Agriculture	<ul style="list-style-type: none"> <li>• 5% first certification period</li> <li>• 10% each successive certification period.</li> </ul>	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification.</p> <p>The operator shall benchmark the prevailing wages against the applicable living wage reference value. If there is a gap, the operator shall set an action plan towards progressively closing the gap by a minimum of 5% in the first certification period (year 1 – 3) and 10% in each successive certification periods (excluding yearly wage indexations on inflation).</p> <p>Applicable living wage reference values will be drawn from the Anker &amp; Anker based living wage benchmark data that will be used to assess the living wage gap. In those regions where a benchmark is not yet available, the national minimum wage for the agricultural sector will be used as a reference as a first step towards a living wage.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<b>CRITERION</b>	<b>2.3 To respect workers right to favourable working conditions (former 2.2)</b>			
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>	
<b>Summary comments - Indicator 2.3.1</b>				
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Replace "workers" with "employees": “Applies to all employees on plant premises and farms included in the certification unit.”</li> <li>- Progressive implementation will be costly</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Operator must provide inclusive spaces and activities in all areas, to promote the inclusion of all groups.</li> <li>- The operator must promote awareness-raising among its workers at all levels to create a culture of respect for people.</li> <li>- To ensure that its management structures are committed to this value, the operator should promote channels for</li> </ul>	

			complaint, evaluate practices and take any complaints raised seriously.
2.3.1 Absence of discrimination  (former 2.2.3)	Mill Agriculture  CORE INDICATOR	Yes	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator has a publicly available, implemented and communicated non-discrimination and equal opportunity policy applicable in recruitment, remuneration, access to training and promotion, and access to facilities.</p> <p>Discrimination includes any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment.</p> <p>Discrimination can be based on race, colour, gender identity, age, language, religion, property/wealth, nationality, ethnic/social origin, caste, disability, pregnancy, indigeneity, union affiliation, political affiliation, marital/family status, personal relationships, health status, sexual orientation or other non-valid reasons that are irrelevant to the skills, capabilities, qualities and medical fitness for the job.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 2.3.2</b>			
	<b>Indicator:</b> - Replace "workers" with "employees": "Applies to all employees on plant premises and farms included in the certification unit."		<b>Guidance:</b> - Provide guidance on how to record a harassment complaint. What system will be valid and accepted? - The operator should promote a culture of respect through awareness raising in order to prevent abuse/harassment and to report and take appropriate actions in the event of verified cases. - To ensure that its management structures are committed to this value, the operator should promote channels for raising complaints, evaluate practices and take any complaint raised seriously.
2.3.2 Absence of abuse/ harassment	Mill Agriculture	Yes	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator has a publicly available, implemented and communicated policy to prevent sexual and all other forms of harassment and violence. Whistle-blowers are protected and their anonymity guaranteed</p>

(former 2.2.4)	CORE INDICATOR		<p>The policy ensures that no worker is subject to unacceptable behaviours and practices, or threats thereof, which results in verbal and non-verbal forms of physical, psychological, sexual or economic harm, and includes gender-based violence, extortion and harassment.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 2.3.3</b>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Replace "workers" with "employees" – “Applies to all employees on plant premises and farms included in the certification unit.”</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Include a system for verification</li> <li>- The operator should hold awareness workshops for workers, unions and the communities surrounding the production areas on the prevention of forced labour/modern slavery</li> <li>- The operator should commit to prohibit any form of modern slavery</li> </ul>
2.3.3 Debt bondage, trafficking, and forced / compulsory labour are absent.  (former 2.2.2)	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	Yes	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Forced or compulsory labour Verification addresses all workers.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 2.3.4</b>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Suggest replacing the first sentence of the indicator description with “Applies to all underaged employees at the plant's facilities.....”</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- To define heavy loads, hazardous substances and processes in the context of sugarcane.</li> <li>- The operator together with the workers, their union and local communities must periodically review the conditions drive children to work and define action and</li> </ul>

				<p>investment plans that ensure that there is no child labour in production.</p> <ul style="list-style-type: none"> <li>- The operator in collaboration with workers, their union organization, the surrounding communities and the interested parties must act to comply with and improve the conditions established in Part XII. Housing of ILO Convention 110 on plantations, and guarantee decent rest to workers who must stay outside their home in order to carry out their work activities for the operator</li> </ul>
<p>2.3.4 Absence of child labour  (former 2.2.1)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	<p>18 Years</p>	<p>Applies to all underaged persons on the premises of the mill and farms included in the unit of certification, regardless of whether they are employed by the operator, and assures that no workers under 18 are present in fields or managing heavy equipment.</p> <p>For young workers above the legal minimum working age but below 18, and for legal apprenticeships, there are restrictions on hours of work and overtime; working at dangerous heights; with dangerous machinery, equipment and tools; Transport of heavy loads; exposure to hazardous substances or processes; and difficult conditions such as night work at night are prohibited. Note that special conditions might apply.</p> <p>The operator implements a system to check worker's ages.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<p><b>Summary comments - Indicator 2.3.5</b></p>				
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify that the indicator covers the provision of accommodation for own employees and employees of service providers.</li> </ul>			<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Additional guidance required such as: <ul style="list-style-type: none"> <li>- How is housing to be provided for migrant families working together?</li> <li>- How many fire extinguishers per person/square meter?</li> <li>- How often will bedding be cleaned?</li> </ul> </li> </ul>

				- The operator in collaboration with workers, their union organization, the surrounding communities and the interested parties must act to comply with and improve the conditions established in Part XII. Housing of ILO Convention 110 on plantations, and guarantee decent rest to workers who must stay outside their home in order to carry out their work activities for the operator
2.3.5 Adequate accommodation is provided.  (former 2.1.8)	Mill Agriculture  CORE INDICATOR	100%	Applies to all housing provided by the unit of certification directly or indirectly via subcontractors. Housing provided must meet local sanitary regulatory standards, or the requirements stated in the guidance, whichever is more stringent.  <i>For further information, see <a href="#">Guidance</a>.</i>	
<b>Summary comments - Indicator 2.3.6</b>				
	<b>Indicator:</b> - To clarify what the principle consists of and documents on		<b>Guidance:</b> - To be reformulated. - An effective Social Dialogue must have worker representatives organization, who are democratically elected by the workers. <i>(Note: it is not clear where in the guidance text this comment refers to – possible misplaced comment)</i>	
2.3.6 Working hours lost as percentage of total hours worked  (former 2.2.6)	Mill	< 5 %	This represents working hours lost due to absenteeism also referred to as “no-show” as well as strikes, non-justified sickness etc. It does not include holiday, legal time off such as maternity leave, or training.  <i>For further information, see <a href="#">Guidance</a>.</i>	
<b>CRITERION</b>	<b>2.4 To safeguard respect for labour rights through functioning social dialogue mechanisms</b>			
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>	

Summary comments - Indicator 2.4.1			
No strong pushback. Mainly comments to improve clarity			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Consider the requirements of national legislation.</li> <li>- Suggest to delete the term "union".</li> <li>- Replace "workers" with "employees": Applies to all employees on plant premises and farms included in the certification unit.</li> </ul>	<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Clarify the expectation of "The agreements and results of social dialogue are communicated".</li> <li>- Clarify that in the absence of a union, alternative organizations are also created freely by the workers and are not created by the employer</li> <li>- Worker representatives must be democratically elected by the workers.</li> <li>- The operator carries out awareness raising/informative activities to educate worked on their right to organised themselves into a union and to seek collective bargaining</li> </ul>	
2.4.1 Respect the right of all workers to form and join trade unions and to bargain collectively free from interference from the operator.  (former 2.2.5)	Mill Agriculture  CORE INDICATOR	Yes	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator respects such rights and does not interfere with workers' own efforts to set up independent representational mechanisms (unions or comparable organizing platforms) in accordance with the Universal Declaration of Human Rights and ILO core Standards.</p> <p>The operator applies guarantees to unionized workers throughout the workforce, extending to non-unionized workers.</p> <p>Collective Bargaining Agreements (CBAs) are regularly negotiated and renegotiated between employers' and workers' organizations and are duly respected to establish and the agreements made are transparent, documented and duly respected in their implementation.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
Summary comments - Indicator 2.4.2			
Mixed response. There is support for the indicator but also some pushback. Participants also requested alignment with national legal systems.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- The Standard should allow the mills to prove their compliance of the national laws, which are adapted to the local realities and circumstances.</li> </ul>	<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Clarify what is considered as "employers 'and workers' organizations".</li> </ul>	

	<ul style="list-style-type: none"> <li>- Social dialogue criteria and provisions are dictated by the ILO and the country's current legal system. There can be no influence or intervention of the employer in the decisions of the workers. The operator cannot and should not be involved in the procedures and with workers decision.</li> <li>- The consultation and exchange must be indicated between workers. If there is a workers' organization, they will represent the workers.</li> <li>- This shouldn't be a core indicator.</li> <li>- Support indicator</li> <li>- Remove indicator - it is not as an obligation of the operator</li> </ul>		<ul style="list-style-type: none"> <li>- Define worker organization vs. organizations that have a legal basis.</li> <li>- To add effective Social Dialogue with representative workers' organization, whose representatives are democratically elected by the workers.</li> </ul>	
2.4.2 Social Dialogue promotes consultation and information exchange between and among employers' and workers' organizations.	Mill Agriculture  CORE INDICATOR	Yes	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification. The operator engages in regular dialogues with direct and indirect workers to promote continuous improvement of working conditions and bargain collectively. The operator also promotes other mechanisms of social dialogue (e.g. mix committees, gender committees, committees to address harassment, and worker consultation practices).</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<p><b>Summary comments - Indicator 2.4.3</b> Strong pushback. Many participants also requested for the scope to be limited to the certified area and highlighted the practical, legal and economic challenges of implementation.</p>				
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- This indicator should only cover the unit of certification to avoid legal and economic challenges which makes impossible for its implementation throughout the supply area</li> <li>- The conflict resolution mechanism can be communicated and used by third parties, but the resolution must be at the discretion of the third party.</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Clarify how it can be assured that all workers are informed of this mechanism.</li> <li>- The company should work together with the workers and the union organization to implement this mechanism.</li> <li>- Evaluate % of resolution for complaints and claims when expanding the scope and with greater area. It is not</li> </ul>	

	<ul style="list-style-type: none"> <li>- Inconsistency between the Spanish and English versions. Please use in the Spanish version: "It applies to all workers in the mill and farm facilities included in the unit of certification."</li> <li>- Clarify the purpose of inserting in collective agreements the complaint procedures with an indicative deadline for each stage.</li> <li>- Clarify the types of process and results available and the means of monitoring implementation. This decision does not depend only on the company, but on a common agreement with the union and others involved.</li> <li>- The objective of the indicator with regard to sugarcane suppliers was not clear.</li> <li>- Clarify the responsibility of the operator on a claim by a worker from a sugarcane supplier as the operator has no way of interfering with the internal management of its sugarcane suppliers.</li> </ul>		<p>possible to achieve 90% resolution with greater scope and area coverage.</p> <ul style="list-style-type: none"> <li>- The operator, together with the workers, their trade union organization, the communities must formulate a conflict resolution mechanism and define the procedures, which comply with the UN Guiding Principles and the OECD Guidelines for Responsible Companies</li> <li>- Clarify what is considered a complaint mechanism</li> </ul>
	<p>2.4.3 Grievance mechanism for workers are in place.  (former 2.41)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>Yes</p>

**PRINCIPLE 3 - MANAGE INPUT, PRODUCTION AND PROCESSING EFFICIENCIES TO ENHANCE SUSTAINABILITY**

<b>CRITERION</b>	3.1 To monitor production and process efficiency; to measure the impacts of production and processing so that improvements are made over time		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<b>Summary comments - Indicator 3.1.1</b>			
Moderate number of comments received for this indicator, mostly on expanding the parameters/considerations used to measure productivity/yields. Many who commented are of the opinion that climate is not the only determining factor and other parameters can have a bigger impact on productivity.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Review the parameters to be used as the definition of climatic zones can generate different interpretation. Establish more parameters adapted to different geographical locations. Current values do not reflect the situation on the ground</li> <li>- Focus on management impacts on yield rather than climatic zones. The indicator assumes that yield is dictated by climate when management practices can have a bigger impact on yield.</li> <li>- Include other parameters besides climatic zones to determine a sustainable yield. The indicator should also consider varietal selection and yield for nearby certified and non-certified operations to place it in better context. This will give a better idea of how crop breeding and local practices can lead to optimum yields.</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- It is important to update the references of the table of climatic zones. With climate change, the productivity rates are already far from reality, even with a moving average of the last 5 years.</li> </ul>
3.1.1 Yield of production	Agriculture	Tc/ha Depending on climatic zone	To maximise yield taking into account the climatic conditions where cane is grown. Climatic zones are determined according to the GPS coordinates of the gathering mill.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.1.2</b>			

	<b>Indicator:</b> - The threshold of (>10%) is currently too low		<b>Guidance:</b> - There should be a progressive improvement to maintain certification until the national high point of sucrose recovery.
3.1.2 Theoretical recoverable sugar content of cane	Mill Agriculture	>10%	Based on the theoretical recovery normalised for juice purity and cane fibre content.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.1.3</b>			
	<b>Indicator:</b> - There should be a progressive improvement to maintain certification until the national high point of TSAI recovery.		<b>Guidance:</b> None
3.1.3 Fermentable total sugars content of cane, expressed as invert (TSAI)	Mill Agriculture	>120Kg/t cane	Used if ethanol is produced, on its own or in conjunction with sugar production. Based on a 90.5 % utilisation of Total Sugars As Invert (TSAI).  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.1.4</b> No strong pushback, most comments are about improving clarity.			
	<b>Indicator:</b> - Clarify the added value of this indicator in comparison to 3.1.3 as they appear repetitive - Clarify if the values provided are total averages. For cases of mechanized harvesting in burning, confirm if criminal or accidental burning is an exception, since it is a condition that cannot be controlled. - Clarify whether the measurement is at the end of the freight or at the end of the milling. Currently the indicator description and the guidance are inconsistent on this point. The indicator also does not say if it is measure in hour or how it is done.		<b>Guidance:</b> - Indicator and associated guidance need to be more aligned and be clearer on topics such as metrics, methodology, etc.

	<ul style="list-style-type: none"> <li>- Align the calculator with changes made to this indicator.</li> <li>- Question: This would require development of a system to record when cane is burnt by individual farmers. Is this really the best measure of harvesting efficiency? This also depends on efficiency of cane transport.</li> </ul>			
3.1.4 Efficiency of harvesting operations	Mill Agriculture	<ul style="list-style-type: none"> <li>&lt;16 for machine harvesting</li> <li>&lt;24 manual green harvesting</li> <li>&lt;48 burnt cane harvesting</li> </ul>	<p>This measures the average time from harvesting (or burning) the cane until it is crushed by the mill (also known as the kill to mill time). For burnt cane it is the time from when the field is burnt prior to harvest until the cane is crushed.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<p><b>Summary comments - Indicator 3.1.5</b> Only one comment was received regarding a typo in the guidance.</p>				
	<p><b>Indicator:</b> None</p>		<p><b>Guidance:</b> - To correct "two line crushing at 400 and 200 tc/h" to "two crushing lines, at 400 and 200 tc/h".</p>	
3.1.5 Mill overall time efficiency	Mill	<ul style="list-style-type: none"> <li>&gt;75 % Processing time as a percentage of total crushing time</li> </ul>	<p>Processing time as a percentage of total crushing time. Any stoppage, including maintenance activities or power supply failure must be counted with the exception of stops due to rainfall exclusively.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<p><b>Summary comments - Indicator 3.1.6</b> Only one comment received stating that it is unclear whether this indicator is only relevant to sugar or sugar and ethanol.</p>				
	<p><b>Indicator:</b> - The wording "used if sugar and ethanol, only if produced from final molasses" is unclear and confusing. Revert to the previous version as the text was clearer for this indicator.</p>		<p><b>Guidance:</b> None</p>	

3.1.6 Factory Performance Index	Mill	>90%	Used if sugar and ethanol, only if produced from final molasses only and in the same mill. % of actual sugar recovery % theoretical recovery of sugar from cane.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.1.7</b> No comment received for this indicator			
	<b>Indicator:</b> None		<b>Guidance:</b> None
3.1.7 Industrial Efficiency	Mill	>75%	Used if ethanol only or sugar and ethanol is produced from anything other than final molasses are produced in the same mill. It is the ratio expressed as a % of the sum of TSAI equivalent products (sugar, ethanol, yeast, and molasses) to the TSAI of the cane.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>CRITERION</b>	<b>3.2 To monitor global warming emissions with a view to minimising climate change impacts</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<b>Summary comments - Indicator 3.2.1</b> Not much pushback. Several participants were requesting for consolidation of environmental management requirements as they feel that different indicators requesting different analysis and plans for each environmental element would result in inefficiencies, increased costs as well as fragmented management plans.			
	<b>Indicator:</b> - Require an overall comprehensive Environmental Management Plan (EMP) rather than several individual plans (water, community, biodiversity, etc.) - Everything should be reflected under the same EMP and include each of the indicators as elements within the EMP		<b>Guidance:</b> - Guidance should provide examples of already established methodologies such as PESTEL or establish the minimum content that the risk analysis should contain. - As the function of this indicator is to measure both environmental and social risks and opportunities, the

	<ul style="list-style-type: none"> <li>- All the different studies/assessments involve costs and human resources to undertake and update them. This will increase the costs of risk analysis</li> <li>- Having to manage so many separate plans will generate more disorder. It would be more efficient to create an indicator that encompasses all the required studies that are already requested in order to streamline processes</li> <li>- It is not feasible to update the plan on an annual basis. Timeframe should be 5 years.</li> <li>- The indicator falls short of stating that the setting up of actions will lead to actual implementation of the actions. Suggest to add "implement actions in a time bound manner prior to the next full audit." <i>(Note: it is not clear if the participant meant for this addition in the indicator description or the guidance)</i></li> <li>- The operator will need to identify the impact on climate change and assess where it will negatively affect operations, and then establish actions to mitigate the effect of climate change and, over time, reduce greenhouse gas emissions.</li> <li>- To consider: If the operator has a consolidated GHG Inventory of its emissions, can it be used to demonstrate mitigation and adaptation actions?</li> <li>- Clarify what a 'resilience plan' is</li> <li>- One suggestion to make this a core indicator</li> </ul>	<p>guidance should include having a risk management plan in place and measuring its economic impact.</p> <ul style="list-style-type: none"> <li>- Need to clearly define the timeframe for each study</li> <li>- Include suggestions or examples of types of actions that could be identified.</li> </ul>	
3.2.1 Climate change adaptation and resilience plan	Mill Agriculture	Yes	The operator shall identify climate change impacts and evaluate where these will negatively affect operations, setting up actions to mitigate the effect of climate change and reduce GHG emissions over time. <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.2.2</b>			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Unclear how this requirement leads to a decrease in GHG emissions in line with the Bonsucro strategy</li> </ul>		<b>Guidance:</b> None

	- Suggestion to make this a core indicator		<ul style="list-style-type: none"> <li>- Should be a time bound progressive reduction in GHG emissions, just as there is a progressive approach to the living wage</li> <li>- Language needs revising for more clarity</li> </ul>
3.2.2 Net GHG emissions per tonne of cane	Agriculture	<40 Kg CO <sub>2</sub> eq/t cane	<p>Estimates the emissions from agriculture activities. The result is also used in the calculation of the total emissions field-to-gate.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 3.2.3</b> Comments received are quite similar to those received in 3.2.2			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Unclear how this requirement leads to a decrease in GHG emissions in line with the Bonsucro strategy</li> <li>- Suggestion to make this a core indicator</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Should be a time bound progressive reduction in GHG emissions, just as there is a progressive approach to the living wage</li> <li>- Suggestion to elaborate on what type of chemical products should be included in the case of the factory/mill.</li> </ul>
3.2.3 Net GHG emissions per tonne of sugar	Mill Agriculture	Total <0.4 t CO <sub>2</sub> eq/t sugar	<p>Only used if sugar is being produced. Field-to-gate emissions. Environmental Burden is t carbon dioxide equivalent.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 3.2.4</b> Similar to indicators above			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Unclear how this requirement leads to a decrease in GHG emissions in line with the Bonsucro strategy</li> <li>- Suggestion to make this a core indicator</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Should be a time bound progressive reduction in GHG emissions, just as there is a progressive approach to the living wage</li> </ul>

3.2.4 Net GHG emissions per MJ of ethanol	Mill Agriculture	Total <24 g CO <sub>2</sub> eq/MJ fuel	Used if ethanol is produced. Environmental Burden is g carbon dioxide equivalent.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.2.5</b>			
	<b>Indicator:</b> - Suggestion to make this a core indicator		<b>Guidance:</b> None
3.2.5 Total Net Primary Energy Usage per kg product	Mill	Total <3000 KJ/kg	Direct and indirect energy inputs.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.2.6</b>			
	<b>Indicator:</b> - This is an opportunity to create value. Suggest this be tied to reduced cost of hauling. - Suggestion to make this a core indicator		<b>Guidance:</b> None
3.2.6 Energy used in cane transport per tonne cane transported	Mill	<50 MJ/t cane	Direct and indirect energy inputs.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.2.7</b>			
	<b>Indicator:</b> - Suggestion to make this a core indicator		<b>Guidance:</b> None

3.2.7 Primary energy use per tonne of sugarcane	Agriculture	<300 MJ/t cane	Direct and indirect energy inputs. <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 3.2.8</b>			
	<b>Indicator:</b> - Suggestion to make this a core indicator		<b>Guidance:</b> - For Bonsucro, "system efficiency" refers to the amount of energy used in machinery, equipment and various appliances compared to the amount of energy contained (also known as "heat capacity") of the ethanol produced by the mill. This proportion must be applied to the total energy of the mill for the last 12 months, at least.
3.2.8 Energy Return on Investment	Mill	<9 Energy Output / Energy input	Calculates the total energy needed to promote one MJ of energy, Applies only to ethanol production. <i>For further information, see <a href="#">Guidance</a>.</i>

**PRINCIPLE 4 - ACTIVELY MANAGE BIODIVERSITY AND ECOSYSTEM SERVICES**

<b>CRITERION</b>	<b>4.1 To protect and rehabilitate biodiversity and ecosystem services, as well as maintaining and enhancing HCVs</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<p><b>Summary comments - Indicator 4.1.1</b>          Most of the comments are focused on reviewing the definition of biodiversity and ecosystem services within the standard as well as better clarification and guidance. Many participants (from industries) were concerned about the indicator complexity for mills to be certified. There is concern from those participants on the scope which covers the whole supply base. Many felt that this generates many legal and economic challenges that makes implementation impossible. The standard must guarantee that it is balanced, rational and fair with all stakeholders, including sugar mills and producers. Applying these requirements outside of the certification area is practically impossible since most suppliers of raw material (sugarcane) are independent natural or legal persons covered by a country's legal framework that does not allow direct interference by the mills. Main concern is around the lack of control and influence the operator has over the management of the farmers. Content of comment is similar as raised in other areas that the complexity and high cost of the standard is not economically viable and will discourage operators from pursuing certification.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify what is the scope of the supply base.</li> <li>- Limit the scope of indicator to the certified area</li> <li>- Clarify in the indicator description whether it is only applicable to new areas or also includes all current supply areas for the plant. Clarify whether it is necessary to revalidate all areas of the scope.</li> <li>- Scope of indicator should go beyond 'ecosystem services'</li> <li>- Sentence 'considers threats and impacts' is not enough and has no significance in terms of addressing issues.</li> <li>- The indicator currently only has an EMP that identifies the mitigation and restoration measures that must be adopted for the impacts identified in the ESIA.</li> <li>- Include that the PGSEB must be prepared on impacts caused on Ecosystem Services and Biodiversity, incorporating HCVs.</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Definition of biodiversity is too narrow: Should include grassland, savannah, wetland, peatland and forest habitats as well as HCVs.</li> <li>- Guidance should also include 'ecosystem functions and processes' on top of ecosystem services</li> <li>- Suggestion to mention that the BESMP identifies and redresses threats and impacts.</li> <li>- It is only feasible to identify all High Conservation Values (AVCs) if Bonsucro provides the materials, methodology and checklist so that the operator can evaluate itself without relying on external contracts and, the service should be evaluated progressively.</li> </ul>

	<ul style="list-style-type: none"> <li>- Review the risk-based approach - carry out an approach to prioritize areas focused on the feasibility of implementing the actions identified with the greatest impact in the plan for own farms.</li> <li>- Requiring this evaluation from independent cane suppliers is a complex process in which other mechanisms may occur, such as an evaluation prior to contracting the purchase of cane.</li> <li>- This indicator tends to be confusing, since it encompasses the evaluation of aspects and impacts, the Environmental Management Program and the HCV areas. Each of these plans have individual actions, which incurs additional costs.</li> <li>- Clarify whether the mitigation and restoration measures need to be implemented in the entire supply base.</li> <li>- Ensure that other indicators mentioned (1.1.4 &amp; 1.1.2) in the standard align with indicator numbers in this standard version</li> <li>- Standard is not suitable to the Australian context where many of the cane farms have been established in the 1800s</li> </ul>	<ul style="list-style-type: none"> <li>- Suggested wording: "The mill operator must have maps identifying the sugarcane plantations and must include all supply areas. Maps should contain at least the location of all plantations and high conservation value areas. The HCV approach provides a framework for identifying high conservation values and implementing measures to maintain or enhance them. To be able to do this simply, a risk-based approach must be developed."</li> </ul>	
<p>4.1.1 – Map biodiversity, ecosystem services and risks across the mill’s supply base.</p>	<p>Agriculture</p> <p>CORE INDICATOR</p>	<p>yes</p>	<p>The mill operator maps the biodiversity resources and ecosystem services on and around planted areas which cane production rests upon and which it impacts, integrated with the risk and impacts assessment detailed in indicator 1.1.4 and, and the HCV risk assessment in consultation with affected stakeholders as identified under indicator 1.1.2.</p> <p>The mapping covers the whole supply base co-ordinated and centralized at the operation under certification.</p> <p>The Biodiversity and Ecosystem Services Management Plan (BESMP) considers threats and impacts the cane production and the mill have on biodiversity and ecosystem services, identifying mitigation and restoration measures that must be taken.</p> <p>The BESMP furthermore incorporates any biodiversity and ecosystem service High Conservation Values (HCVs) as identified by the HCV risk assessment (see 4.1.4 below) to guarantee a wholistic approach to conservation.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>

**Summary comments - Indicator 4.1.2**

The criterion received some level of pushback. Concerns raised around cost and feasibility of implementation. For instance, to develop a Biodiversity Management Plan and Ecosystem Services with the classification of all High Conservation Values (AVCs) and with the level of complexity that the standard is requiring, will require from the operator a high investment for hiring a specialized company and time for readjustment. There is also pushback on the scope of the indicator covering the supply area. Many felt that this generates many legal and economic challenges that makes implementation impossible. The standard must guarantee that it is balanced, rational and fair with all stakeholders, including sugar mills and producers. Applying these requirements outside of the certification area is practically impossible since most suppliers of raw material (sugarcane) are independent natural or legal persons covered by a country's legal framework that does not allow direct interference by the mills. Main concern is around the lack of control and influence the operator has over the management of the farmers. Content of comment is similar as raised in other areas that the complexity and high cost of the standard is not economically viable and will discourage operators from pursuing certification.

There are also several comments requiring better clarification and guidance. There is also a request for Bonsucro to provide necessary tools and materials to enable operators to conduct this on their own without an external consultant

**Indicator:**

- Word 'consider' not strong enough to ensure that operators properly address biodiversity issues. Same with mitigate. Focus of the standard should not be on avoiding worst case scenario.
- Suggested wording: "A PGSEB should be prepared on impacts caused on Ecosystem Services and Biodiversity, incorporating HCVs. Threats to SEBs, mitigation and restoration measures to be implemented must be identified in this. It involves developing studies and projects in relation to Biodiversity, Services Ecosystem and HCV, as well as monitoring and programs."
- Consider the economic implications - this should be incorporated into the HCV study to avoid duplication of work
- Scope of indicator should be limited to certified area
- Unclear what is the difference between 4.1.1 & 4.1.2

**Guidance:**

- Clarify what is meant by 'surrounding area'
- Guidance should include instructions on what information should be provided to each interested party
- Suggestion to include that each certification production area should hire a recognized biodiversity management expert to identify threats and impacts from cane production. Then develop and implement a plan to steward and restore biodiversity, ecosystem processes, ecosystem services, and native habitat types by identifying restoration and redress activities.
- Bonsucro **MUST** provide materials, methodology and checklists so that the operator can evaluate itself without relying on external contracts. Evaluation should be done progressively

				- Define level of detail expected under the mapping exercise and the frequency	
4.1.2 Maintain and enhance biodiversity, ecosystem services and HCVs on and around farm areas	Agriculture	yes	<p>The grower operator develops and implements a Biodiversity and Ecosystem Services Management Plan (BESMP). The BESMP considers threats and impacts the cane production have on biodiversity, ecosystem services and HCVs, identifying mitigation and restoration measures that must be taken.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>		
<b>Summary comments - Indicator 4.1.3</b>					
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Request to remove indicator as there are no historical records of land use changes in some countries (e.g. Costa Rica)</li> <li>- Analysis should be allowed to be carried out by internal personnel. Clarify what qualifies under "The analysis must be performed by professionals with experience in GIS and remote sensing."</li> <li>- In an Australian context it should require for such development to comply with all approvals.</li> </ul>			<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Provide materials, methodology and checklist so that the operator can evaluate itself without relying on external contracts</li> <li>- Cover broader scope to include non-classified habitats such as forests, grassland, peatland, wetland and savannahs</li> <li>- In some regions there are no satellite images available before 2007, which makes it difficult to prove this indicator. There should be an exception made, stating that in the absence of satellite images, other evidence may be presented.</li> </ul>	

<p>4.1.3 Percentage of areas of natural ecosystems defined internationally or nationally as legally protected converted to sugarcane on or after 1 January 2008</p>	<p>Agriculture  CORE INDICATOR</p>	<p>0%</p>	<p>The operator conducts a historic land use change analysis of the unit of certification in order to determine if land converted to sugarcane on or after 1<sup>st</sup> January 2008 has damaged natural ecosystems defined internationally or nationally as legally protected.</p> <p>For further information, see <a href="#">Guidance</a>.</p>
<p><b>Summary comments - Indicator 4.1.4</b> Most of the comments are requesting for the scope to be limited to the unit of certification due to practical and economic implications. One participant requested that the plan be progressive and that it allow the increase in the progress of the components from year to year, depending on the feasibility of the impacts and areas identified. Other comments are about clarification on how the indicator is applied.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Scope should be limited to unit of certification</li> <li>- Bonsucro is developing a tool for risk analysis to support implementation of the HCV principles. This tool has not yet been published, which does not establish the analysis methodology.</li> <li>- Suggested wording: "In the case of rural land or new farming projects, the operator must perform the 'High Conservation Value (HCV) Risk Assessment for Expansion' and must implement the HCV Risk Assessment procedures. This will cover the entire supply area, centralized in the operation requesting the certification. Bonsucro is developing a risk analysis tool that favors the implementation of the HCV principles."</li> <li>- Clarify whether in the case of expansions in areas with HCV before January 1, 2008, if these areas can continue to be used. Also clarify what happens to areas that are already</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Plan should be progressive and that it allow the increase in the progress of the components from year to year, depending on the feasibility of the impacts and areas identified.</li> <li>- Clarify the expansion threshold for this assessment to be made (e.g. 5% expansion)</li> <li>- How is it implemented throughout the supply area? Must there be evidence that expansions outside the certification area made this analysis?</li> </ul>

	defined as agricultural or if use is restricted. For farms that were already suitable before January 1, 2008.		
4.1.4 – Across the whole cane supplying area future expansion is conducted in non-HCV areas.	Mill Agriculture  CORE INDICATOR  whole cane supplying area	Yes	No expansion into natural ecosystems or on areas containing HCVs. For greenfield expansion or new sugarcane projects the grower operator conducts the “Bonsucro HCV Risk Assessment for expansion” for the planned areas and implement the HCV Risk Assessment procedures.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 4.1.5</b> Comments raised around considering the economic implications associated with complying with this indicator Comment stating that this requirement threatens economic sustainability, especially since social issues are required in these studies.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Indicator does not add value to what is already asked for in indicator 4.1.4.</li> <li>- Bonsucro's expansion criterion is unclear, as eventually the operators increase production/milling capacity without necessarily increasing their supply area, through process improvements, new equipment, etc. This is covered by environmental licensing, but no socio-environmental assessment is required. Some expansions occur on already established areas of sugarcane, i.e., acquisition of another operator, etc. Would the indicator apply to these cases?</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- The requirement to undertake a socio-environmental assessment should be aligned with the legal requirement of each country. For instance, in Brazil some states require licensing for the agricultural area and others do not.</li> </ul>
4.1.5 Percentage of greenfield expansion or new sugarcane project covered by ESIA	Mill Agriculture  CORE INDICATOR	100%	Applicable when there are major changes to the workforce (for example mechanisation) or field expansion (>5% of total supply area of 5 % rolling average, 1000has, whichever is smaller) or establishment of new sugar operations - changes are covered by ESIA.  <i>For further information, see <a href="#">Guidance</a>.</i>

<b>CRITERION</b>	<b>4.2 Soil Management Plan in place to avoid erosion and maintain and improve soil health</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<b>Summary comments - Indicator 4.2.1</b>			
Comments received mainly about improving guidance for implementation			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Given the importance of soil, the indicator falls quite short of what is needed. The guidance for the soil management plan is too thin and more up-to-date thinking in soil health is needed.</li> <li>- Clarification: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate this into a plan or will the set of practices and procedures be accepted?</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- The soil management plan should focus on building soil and soil organic matter through the revitalization of the soil ecosystem. The guidance for the soil management plan is not inclusive of key issues nor the latest testing. Suggest to refer to the following resources to re-write the entire guidance for the indicator: <ul style="list-style-type: none"> <li>- <a href="https://www.frontiersin.org/articles/10.3389/fenvs.2019.00113/full">https://www.frontiersin.org/articles/10.3389/fenvs.2019.00113/full</a></li> <li>- <a href="https://northeast.sare.org/resources/cornell-soil-health-assessment/">https://northeast.sare.org/resources/cornell-soil-health-assessment/</a></li> <li>- <a href="https://soilhealthinstitute.org/">https://soilhealthinstitute.org/</a></li> <li>- <a href="https://www.soilfoodweb.com/">https://www.soilfoodweb.com/</a></li> </ul> </li> <li>- Clarify if the set of practices, procedures and systems for the agricultural area can be considered as the Soil Management Plan.</li> </ul>

4.2.1 Mapping of soils and/or soil management units of the farm	Agriculture  CORE INDICATOR	Yes	<p>The operator develops and implements a Soil Management Plan (SMP) that articulates the better management practices required for the operator to ensure the prevention of soil degradation and erosion of the farm's soils and to permit the optimal use of resources.</p> <p>The foundation for the SMP is laid by the operator mapping field boundaries and their soil management unit/s, which may include soil types. Practices aimed at preventing, mitigating, remedying and reducing soil degradation for each management unit are to be outlined.</p> <p><i>For more information see <a href="#">guidance</a></i></p>
<p><b>Summary comments - Indicator 4.2.2</b> Most comments were concerned about economic costs of conducting soil studies regularly.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Indicator falls short of what is needed given the importance of soil</li> <li>- Revise the term 'continuous monitoring'. It is unclear whether it means sampling annually or several times per year - (<i>Note: it is not clear where in the indicator text this comment refers to</i>)</li> <li>- Clarify 'once per crop cycle'. Is it annually or every 5 years?</li> <li>- Suggested wording: "The Soil Management Plan defines objectives to improve soil condition through continuous monitoring of dynamic soil properties that affect nutrition (soil fertility measures), monitoring of organic carbon (easily oxidized or total), or soil properties. linked to decreases in crop yield (e.g. acidity, salinity / sodium). "</li> <li>- In terms of pH ranges, consider the nature and properties of the soil (mineralogy), since there are soils that by their very nature have pH ranges that are outside of what the norm indicates (calcareous, acidic soils)</li> <li>- Specify the bibliographic references used to elaborate the parameters in this indicator</li> <li>- Clarify whether it is necessary to have measurable objectives and goals such as in the BESMP</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- The economic impact of conducting soil studies is not evaluated, nor is it taken into account the possible differences in soil characteristics depending on the territory.</li> <li>- Guidance defines timeline as every 5 years which is too long an interval to be consider sustainable. This needs to be revised</li> <li>- Soil health should be defined as functioning soil</li> <li>- Useful resources: <ul style="list-style-type: none"> <li>- <a href="https://northeast.sare.org/resources/cornell-soil-health-assessment/">https://northeast.sare.org/resources/cornell-soil-health-assessment/</a></li> <li>- <a href="https://soilhealthinstitute.org/">https://soilhealthinstitute.org/</a></li> <li>- <a href="https://www.soilfoodweb.com/">https://www.soilfoodweb.com/</a></li> </ul> </li> </ul>

	<p>- Question: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate this into a plan or will the set of practices and procedures be accepted? <i>(Note: repeated across 4.2)</i></p>			
<p>4.2.2 Soil samples are taken and used to develop objectives for soil health and crop nutrition programmes.</p>	<p>Agriculture</p>	<p>Yes</p>	<p>The Soil Management Plan sets objectives for soil health by regular monitoring of dynamic soil properties that affect nutrition (soil fertility measures), monitoring of organic carbon (readily oxidisable or total) and/or properties linked to declines in crop performance (e.g. acidity, salinity/sodicity).</p> <p><i>For more information, see <a href="#">guidance</a></i></p>	
<p><b>Summary comments - Indicator 4.2.3</b> Repetitive of comments in other indicators for criterion 4.2.</p>				
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify the objective for such a complex analysis when the unit already carries out proper soil management.</li> <li>- Question: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate this into a plan or will the set of practices and procedures be accepted? <i>(Note: repeated across 4.2)</i></li> </ul>			<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Other key practices and indicators of soil health are missing e.g. Reduced tillage, crop rotation or multi-cropping should be incorporated. Soil biological activity, respiration, compaction, erosion, and bulk density should be considered, along with actually growing soil.</li> <li>- Specify the bibliographic references used to elaborate the parameters mentioned in this criterion.</li> <li>- Need to make clear that the set of practices, procedures and systems of the agricultural area can be considered as the Soil Management Plan.</li> </ul>

4.2.3 Health of the soil improved and maintained through setting objectives and implementing appropriate BMPs	Agriculture	Yes for each	<p>Soil Management Plan shall identify better management practices (BMP's) that aim to enhance soil health and are based on soil sampling and analysis, and set objectives for improving and maintaining soil health in the following categories:</p> <ul style="list-style-type: none"> <li>Soil cover</li> <li>Organic matter</li> <li>Soil acidity</li> <li>Salinity/Sodicity</li> </ul> <p><i>For more information, see <a href="#">Guidance</a></i></p>
<p><b>Summary comments - Indicator 4.2.4</b>  Repetitive of comments in other indicators for criterion 4.2.</p>			
	<p><b>Indicator:</b>  Question: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate this into a plan or will the set of practices and procedures be accepted? <i>(Note: repeated across 4.2)</i></p>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Key elements of soil health are missing and should also include crop rotation/intercropping, reduced compaction, improved bulk density, improved respiration, improved water infiltration rates and water holding capacity, and actually growing soil.</li> <li>- Like the progression to a living wage, this indicator needs to be a progressive improvement in soil health.</li> </ul>
	4.2.4 Fields with samples indicating low organic matter, acidity or Salinity/sodicity are corrected.	Agriculture	Yes

### Summary comments - Indicator 4.2.5

Most comments are about improving clarity and guidance. However, once comment questioned the use of standard NPK tests as a measure for soil health.

#### Indicator:

- Not meeting key goals of the standard and not requiring more accurate tests. The standard NPK tests are outdated and inaccurate leading to over application, loss of income, increased GHG emissions and poor water quality. Additionally, this does not recognize the biological functions of soil organisms to deliver plant nutrition.
- The implementation of a sampling plan should include the following variables: Macronutrients, organic carbon, pH and acidity of the soil and texture.
- Organic carbon analysis is not currently carried out, however it is feasible in the long term, depending on the renewal of the crop. Need to consider the validation period.

#### Guidance:

- Calculation equation is unclear (*Note: it is not clear where in the guidance text this comment refers to*)
- Like the progression to a living wage, this indicator needs to be a progressive improvement in soil health.
- There should be a progressive reduction of NPK with a progressive improvement in soil health based on up-to-date testing and farm methods that reduce inputs while treating soil as a living ecosystem rather than a chemistry set to which you add NPK.
- Suggested references:
  - <https://experts.illinois.edu/en/publications/quantifying-soil-nitrogen-mineralization-to-improve-fertilizer-ni>
  - <https://phys.org/news/2014-07-fertilizer-accurate-soil.html>
  - <https://northeast.sare.org/resources/cornell-soil-health-assessment/>
  - <https://soilhealthinstitute.org/>
  - <https://www.soilfoodweb.com/>

<p>4.2.5 Ratio of fertiliser N P K applied to fertilizer N P K recommended by soil analysis</p> <p>(Previously 4.2.6)</p>	<p>Agriculture</p> <p>CORE INDICATOR</p>	<p>&lt;1.10 for each nutrient (Ratio applied to recommended)</p>	<p>The Soil Management Plan sets objectives for fertiliser to be applied according to soil analysis.</p> <p>Applied fertiliser should not exceed 10% of the recommended fertiliser for the farm.</p> <p><i>For more information, see <a href="#">Guidance</a></i></p>
<p><b>Summary comments - Indicator 4.2.6</b> Very few comments received. Comment on focusing on overall soil health and soil organic matter rather than erosion and compaction.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Net erosion should be eliminated with a perennial crop like sugarcane. Suggest incorporating as part of the wider soil health plan indicators.</li> <li>- Clarify whether this is a mandatory indicator</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Guidance should focus on growing soil and soil organic matter rather than mitigate and minimize soil erosion, compaction and loss of organic matter.</li> </ul>
<p>4.2.6 Practices to minimise and control soil erosion and compaction.</p> <p>(Previously 4.2.4)</p>	<p>Agriculture</p>	<p>Yes</p>	<p>The Soil Management Plan identifies practices that mitigate and minimise soil erosion, compaction and loss of organic matter taking place in sugarcane fields and sets objectives for implementing remedial and mitigation actions.</p> <p><i>For more information, see <a href="#">Guidance</a></i></p>
<p><b>Summary comments - Indicator 4.2.7</b> No pushback but some clarification required.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Bonsucro recommends cold burning, if necessary. After the cane is burned, the mulch and residual biomass must be conserved, either by spreading them in the plantations or by raking and placing them between the rows.</li> </ul>		<p><b>Guidance:</b></p> <p>None</p>

	<ul style="list-style-type: none"> <li>- Recommendation to include a gradual plan for implementation, since not all producers and operators have specialized agricultural machinery to incorporate stubble into the soil. For example, in Nicaragua, the law allows for permits to be requested, regulating their correct implementation if necessary.</li> <li>- Question: Why only after harvest and not before harvest (<i>see indicator text</i>)? This indicator needs to progressively eliminate all burning.</li> </ul>		
4.2.7 Burning of sugarcane tops and leaves after harvest is prevented  (Previously 2.4.5)	Agriculture	Yes	<p>This only applies to fields which have been burnt prior to harvest (i.e. no green cane harvesting). No burning of mulch/trash blanket after harvest except where this would be required for field cultivation for replanting. If sugarcane is burnt prior to harvest, it is done so only with cool burns (or also referred to as “cool-burning”). Tops must be retained and evenly scattered.</p> <p><i>For more information, see <a href="#">Guidance</a></i></p>
<b>CRITERION</b>	<b>4.3. Water Stewardship Plan in place</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<p><b>Summary comments - Indicator 4.3.1</b></p> <p>Very strong pushback against the inclusion of the whole cane supplying area in the indicator's scope. Many felt that this generates many legal and economic challenges that makes implementation impossible. It is also not clear how this effort will be retributed, particularly to small cane growers, who already face many difficulties. The standard must guarantee that it is balanced, rational and fair with all stakeholders, including sugar mills and producers. Applying these requirements outside of the certification area is practically impossible since most suppliers of raw material (sugarcane) are independent natural or legal persons covered by a country's legal framework that does not allow direct interference by the mills. Main concern is around the lack of control and influence the operator has over the management of the farmers. Content of comment is similar as raised in other areas that the complexity and high cost of the standard is not economically viable and will discourage operators from pursuing certification.</p>			

**Indicator:**

- This indicator is inconsistent with soil health and NPK use indicators.
- Suggested indicator wording: "The operator must develop a Water Resources Management Plan with achievable actions, agreed responsibilities, deadlines and assigned resources. This plan should reflect the organization's continuous improvement and learning principles. At a minimum, it should include the following:
  - Identify all water resources (including catchment areas) and define their level of availability (water stress). Identify other water users using the identified catchment areas.
  - Identify local water initiatives and list the organizations involved in water management.
  - It must cover the entire supply area, centralized in the operation requesting certification, without requiring separate identification processes for each farm."
- A study of this dimension has high implementation costs.
- The scope of this indicator should be limited to the unit of certification
- This should be a progressive indicator due to the degree of complexity and resources that are required to have all the elements.
- The proposed resource management plan focuses on a hydrogeological or hydrological study by sub-basin. To meet the objectives proposed in this indicator, it must be directed by a competent authority and not by the operator. Taking into account that in the sub-basin there are different types of users, different types of activities (industrial, agricultural, service) and there the presence of communities. Therefore, the commitment should be that individual actions are developed by the operators and not by the magnitude established in the indicator.
- Promote collaboration with other entities because it is not feasible that all the responsibility of the management is on the operator. Other intermediary entities may be responsible for documenting collaborative and collective actions to promote sustainable use and participation with other water users.

**Guidance:**

- Define 'water management plan'
- Need to link to irrigation use, right to use water, and soil health as well as NPK use. 110% of advised NPK use will not lead to an effective water stewardship plan.
- Suggested guidance: "The operator must develop a water resources management plan according to the level of availability or water stress identified. The plan must contain, at a minimum:
  - actionable actions
  - agreed responsibilities
  - time limits and assigned resources
  - identification of other initiatives for the care and sustainable management of water that have local action."

<p>4.3.1 Identify main water resources, catchment areas where the water resource is provided and develop and implement an action plan to contribute to its sustainability and setting objectives for water stewardship.</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>Yes</p>	<p>The operator develops and implements a Water Stewardship Plan (WSP) with achievable actions, agreed responsibilities, timeframes and allocated resources. The WSP reflects continuous improvement and organisational learning principles. As a minimum, it will include the following:</p> <ul style="list-style-type: none"> <li>• identify mainwater resources (including catchment areas, basin, sub-basin or microbasin), define their level of availability (water stress), and set objectives for water stewardship</li> <li>• Map other users of water utilising mapped catchment areas (depending on level of complexity, this can be aggregated by user category such as local authorities supplying water, other crops, mining, etc.)</li> <li>• Map local water initiatives and list organisations involved in water management</li> </ul> <p>Covers the whole cane supplying area, centralized at the operation under certification without requiring separate mapping processes for individual farms.</p> <p><i>For more information, see <a href="#">guidance</a></i></p>
<p><b>Summary comments - Indicator 4.3.2</b></p> <p>Strong pushback against including the whole cane supplying area in the scope and request that this indicator does not go beyond national legal requirements. Operators would not be able to engage in legal proceedings or conflicts in the areas of their suppliers.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Scope should be limited to unit of certification</li> <li>- Request that this indicator does not go beyond national legislation.</li> <li>- Indicator does not establish a procedure on land claims, nor does it establish how Convention 169 is applied.</li> <li>- Suggested wording: "The operator must demonstrate legal and customary rights to land and water. In addition, the operator shall identify the documents necessary to demonstrate legal and customary rights to land and water in the supply area of the certification unit. The operator must have a system in place to track supplier compliance with established documents and encourage regulatory compliance. When the rights to the land have been transferred to the benefit of the operator, the operator must demonstrate</li> </ul>	<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Define limits to be considered when preparing and analyzing claims in relation to the mapping of claims</li> </ul>	

	<p>that the decision was made with free, prior and informed consent, and that it was negotiated."</p> <ul style="list-style-type: none"> <li>- Suggested wording: "The Operator can prove its legal rights of ownership and use of land and water according to the applicable legislation, of the area of its own or of which it has the transfer of rights. The identification of claims covers the area of its own or of which the transfer of rights is had".</li> </ul>		
4.3.2 Mapping of land/water titles & claims is conducted.	<p>Mill Agriculture</p> <p>Whole Cane supplying area</p>	Yes	<p>The operator demonstrates statutory and customary land and water rights wherever applicable. The operator also maps the documents needed to demonstrate statutory and customary land and water rights in the cane supplying area outside the unit of certification. The operator has a system in place to track supplier compliance with the stated documents and encourage compliance. The operator conducts a physical mapping of claims on land &amp; water and articulates how claims are to be handled in line with processes laid out in the Guidance. Claim mapping covers the whole cane supplying area of the certified entity. When land rights have been relinquished to the benefit of the operator, the operator demonstrates the decision was taken by Free Prior Informed Consent and negotiated.</p> <p>Also see indicator 1.4.2 in Principle 1.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 4.3.3</b></p> <p>Less pushback for this indicator compared to the others in criterion 4.3. Some questions and concerns raised in managing water resources outside of the certified area. As mentioned by one participant from Brazil, implementation is complex and will require the hiring of a specialised company. Clarifications are also required on the level of engagement that need to be demonstrated.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Concern expressed that the obligation to collaborate with different actors can represent a difficulty. No amount or time range is established on the actions proposed by Bonsucro</li> <li>- Question: In Brazil, there is a committee for watershed management and all actions related to the watershed is managed by the Committee and not independently. Would the operator's participation in the respective committees of the river basins be sufficient to</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Clarify whether the measurement of water stress refers directly to sugarcane plantations or the catchment sources.</li> <li>- Suggested wording: "The operator must demonstrate active participation in the initiatives and processes of the local community, with NGOs,</li> </ul>

	<p>demonstrate the actions of engagement and participation, and the effective actions are carried out by the Committee with the participation and involvement of all stakeholders?</p> <ul style="list-style-type: none"> <li>- Suggested wording: "When water stress occurs, the operator must document its participation in collaborative and collective actions to promote the sustainable use of water and participation with other water users, the government and civil society in the collection or planning and management of water of aquifer, including how to allocate water equitably and without conflict."</li> <li>- Measurement of water stress must be limited to certified area</li> </ul>		<p>regional and national public entities, etc., with the aim of making sustainable management and care of water. If a local initiative or that of another interested party is not being developed in the area, the operator must generate initiatives that promote the sustainable use of water."</p> <ul style="list-style-type: none"> <li>- Clearly define how to establish whether or not a local initiative is being developed - evaluated by basin, geographic area, country?</li> <li>- Define how to assess what is considered water stress</li> <li>- Clarify the level of involvement / engagement expected and/or provide examples of possible engagement and participation actions.</li> </ul>
4.3.3 Engaging in collaborative action to promote sustainable water use	Mill Agriculture	Yes	<p>When water resources are stressed, the operator documents their engagement in collaborative and collective action to promote sustainable water use and participation with other water users, government and civil society in catchment or aquifer water planning and management including in how to allocate water equitably and without conflict</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>Summary comments - Indicator 4.3.4</b>			
	<b>Indicator:</b>		<b>Guidance:</b> - Provide a guide for calculation with clear criteria
4.3.4 Net water consumed per unit mass of product	Mill	<p>&lt;20 for sugar only or &lt;30 for ethanol</p> <p>Kg of water/kg of mass product</p>	<p>Water consumed at mill = water used less water returned to the environment. If effluents are exported by the mill to the fields for irrigation, the mill accounts for it as water returned to the environment.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>

Summary comments - Indicator 4.3.5			
Comments from participants are mostly to seek clarification			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Clarify whether only irrigation with water is being considered or if it also includes wastewater and vinasse. Most of the plants in Brazil use wastewater and vinasse, would this indicator also apply for these cases?</li> <li>- Question: Will this calculation be through a calculator?</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Clarify where the values of WPo values of 66 and 0.05 come from.</li> <li>- Be more descriptive of how WPo and WPa are obtained to better understand their concept.</li> </ul>
4.3.5 Irrigation Water Productivity	Agriculture	$WP_a \geq WP_o$	<p>To ensure irrigated water is used efficiently.</p> <p>Water productivity (WP) is a measure of how effectively irrigation water is used to produce sugarcane. WP equals the cane yield harvested (t/ha), divided by the net irrigation applied over the growing season (mm).</p> <p>Irrigation water productivity is strongly influenced by the amount of rain received. This relationship is expressed as the <u>benchmark water productivity</u> - WPo</p> <p>Actual cane yield and net irrigation applied over the growing season (mm) will determine <u>actual water productivity</u> value - WPa.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
Summary comments - Indicator 4.3.6			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Clarify if the indicator leads to healthy aquatic ecosystems</li> </ul>		<b>Guidance:</b> None
4.3.6 Dissolved oxygen in effluent point	Mill	$\geq 2.5$ PPM Or 1 Kg COD / T product or 0.25 kg/T BOD	<p>Dissolved oxygen is an indicator of the quantity of oxygen available in the receiving stream to support life. Sampling should be carried at the discharging point.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>CRITERION</b>	<b>4.4 - Pest, Disease and Weed Management Plans in place and implemented</b>		

INDICATOR	Scope	Standard	Full indicator wording
<p><b>Summary comments - Indicator 4.4.1</b> Strong pushback against including whole cane supplying area in the scope. Concerns are mostly due to economic implications.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Consider economic implication and limit scope to the unit of certification</li> <li>- Suggestion to combine indicators 4.4.1, 4.4.2 and 4.4.3 and add that there is a plan in place with verified continued reduction in toxic chemical (synthetic or organic) use.</li> <li>- Suggested wording: "The operator must identify pests, including weeds that affect the plantations, and define, for each one, the threshold when pest control becomes necessary. The plan must cover the entire supply area, centralized in the operation requesting certification, without requiring separate identification processes for each farm."</li> <li>- Improve wording on the scope of the area covered by the indicator.</li> <li>- Indicator needs further elaboration (e.g. frequency, range of identification) as carrying out these controls has an economic impact</li> <li>- Request for further clarification: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate these into a plan or will the set of practices and procedures be accepted?</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Suggested wording: "The operator must create and implement a pest and disease control plan that defines the threshold of damage for each pest and disease for when control is necessary. The pest and disease control plan must cover all growing areas in the certification process."</li> <li>- Need to expand on what is meant by historical and potential pests.</li> <li>- Define the frequency of the identification and monitoring</li> </ul>
	<p>4.4.1 Identification and monitoring of current, historical and potential pests and diseases</p>	<p>Agriculture  CORE INDICATOR  Whole cane supplying area</p>	<p>80% of area</p>

<b>Summary comments - Indicator 4.4.2</b> Most common comment is to consider including the possibility to establish a protocol for the use of rodenticides, as part of a comprehensive pest plan (request made by several Central American stakeholders)			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- include the possibility to establish a protocol for the use of rodenticides, as part of a comprehensive pest plan (specific case of Central America).</li> <li>- Suggested indicator wording: "The operator shall develop an agroecological plan to control pests and diseases and implement good agroecological practices against pests to prevent harmful pest populations from developing and minimize economic losses."</li> <li>- Question asked: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate these into a plan or will the set of practices and procedures be accepted?</li> </ul>	<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Consider that no single set of strategies is applicable to all situations. The overall goal should be to minimize the economic impact and reduce the development of pests and diseases while minimizing the off-site impact. Different pests and diseases have different ecologies, distribution, possible impacts, and controls. Furthermore, agricultural systems vary due to different environmental and social constraints.</li> </ul>	
4.4.2 Pest and disease management practices implemented	Agriculture	80% of area	The operator uses a pest and disease management plan that integrates agronomic, biological and chemical strategies appropriate to the target species and farming system to minimise the economic impact of pests and diseases and minimise off-site impacts.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 4.4.3</b>			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Question asked: The agricultural area usually has all the information requested through a series of procedures, systems and documents, will it be necessary to consolidate these into a plan or will the set of practices and procedures be accepted?</li> </ul>	<b>Guidance:</b> None	

4.4.3 Integrated Weed Management plan	Agriculture	80% of area covered by	<p>The operator uses a weed management plan that integrates agronomic and biological strategies appropriate to the target species and farming system (integrating chemical strategies as a last resource) to minimise the economic impact of weeds and minimise off-site impacts.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 4.4.4</b></p> <p>Majority of comments are to include exemptions in case of exceptional circumstances. Several participants felt that the amount of 5 kg of active ingredient per hectare is not possible for areas that have problems with weeds and pests because the technologies available in the market to control them exceeds the limit stipulated by the Standard. If Bonsucro continues to measure this indicator with the limit of 5kg of active ingredient per hectare, it can only be applied in areas without pest and weed problems and consequently, areas with any other adversity will not be taken into account, causing the need to remove several farms and reducing the certified scope.</p> <p>One request to allow progressive implementation (indicator is currently a core one)</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- It is suggested to review the 5kg active ingredient per hectare proposed in the standard, as in some regions this might not apply. Instead, it is also suggested to establish ranges for the application of products according to toxicological classes.</li> <li>- Currently no alternative measures are established for the maximum use of agrochemicals. Application of the indicator is carried out according to the type and quantity of weeds, climatic conditions and type of soil. Allow exceptions in cases where it is necessary to apply more than 5kg of active ingredient. Due to droughts, growers have breached the limit to avoid loss of productivity and long-term damage to their crop. It should be allowed to justify these exceptions.</li> <li>- The indicator does not clarify whether it refers to the average of the areas under certification or that all areas must be below that value.</li> <li>- Suggested wording: "Minimize air, soil and water pollution, especially the impact outside the growing area. Applied amounts of active ingredients of agrochemicals. It should also</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- It is not clear how and when exceptions can be applied</li> <li>- Suggested wording: "The operator must keep records of the agrochemicals applied to the crops. The operator must apply only products registered for their specific use and in the proportions recommended on the label. The operator must keep records of the amount of active ingredients applied and must not exceed 5 kg of active ingredient per hectare, per year"</li> <li>- Instead of monitoring the limits of the active ingredient applied, the Standard should consider what actually impacts the environment, which is the toxicological degree of the products. As a</li> </ul>

	<p>be noted that only registered products should be used and in the registered quantities. Use according to label directions."</p>		<p>suggestion, it should establish ranges for the application of products according to toxicological classes (the lower the toxicological class, the higher the volume that can be applied) and request that the operator insert in the Soil Management Plan all the good practices that are performed, such as biological control. In situations of use of biological control the operator could benefit from the indicator because it is a way to encourage the replacement of other chemicals that would be applied (areas treated with biological control no longer need chemical control).</p> <ul style="list-style-type: none"> <li>- A composition by toxicological class of the products should be made and weights should be assigned for each class. The use of absolute value incurs technical error</li> </ul>
4.4.4 Agro-chemicals applied per hectare per year	Agriculture  CORE INDICATOR	<5 kg active ingredient / ha/year	<p>To minimise air, soil and water contamination, particularly off-site impacts. Quantities of active ingredients of agro-chemicals (including pesticides, herbicides, insecticides, fungicides, nematocides, ripeners) applied. Also note the requirement to use only products registered for use and at registered rates. Use in accordance with label directions.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 4.4.5</b></p> <p>Not many comments. Requests around clarification especially in cases where exemptions could be allowed. One comment from Latin America is to consider exemptions from this indicator when no other alternatives are available because in the case of the rodent plague it is of economic importance for Central America and to also consider current national legislation. It is also important to establish mechanisms to verify these exceptions.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Consider existing pests in the different regions, since they vary in terms of climates and biodiversity.</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Improve the wording in the last sentence in the guide where national legislation is referenced in the case of an "exception". It is not clear how the</li> </ul>

	<p>- Suggested wording: "Agrochemical active ingredient amounts including: A. Pesticide formulas that meet the criteria for classes IA (extremely hazardous) or IB (highly hazardous) of the WHO Recommended Classification of Pesticides according to their risks, B. Active ingredients of pesticides and their formulation that meet the carcinogenicity criteria of categories 1A and 1B of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS)."</p>		<p>exception will be applied and the mechanisms that should be established to verify such exceptions.</p> <ul style="list-style-type: none"> <li>- Suggestion to carry out best existing and profitable practices for control according to the pests identified in the region.</li> <li>- Present the complete list of prohibited agrochemicals with the incorporation of the GHS categories mentioned in the Draft</li> </ul>
4.4.5 Banned agro-chemicals applied per hectare per year	Agriculture  CORE INDICATOR	0 kg active ingredient/ha/y	<p>Quantities of active ingredients of agro-chemicals included in:</p> <ul style="list-style-type: none"> <li>A. Pesticide formulations that meet the criteria of classes Ia (extremely hazardous) or Ib (highly hazardous) of the WHO Recommended Classification of Pesticides by Hazard;</li> <li>B. Pesticide active ingredients and their formulations that meet the criteria of carcinogenicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS);</li> <li>C. Pesticide active ingredients and their formulations that meet the criteria of mutagenicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS);</li> <li>D. Pesticide active ingredients and their formulations that meet the criteria of reproductive toxicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals;</li> <li>E. Pesticide active ingredients listed by the Stockholm Convention in its Annexes A and B, and those meeting all the criteria in paragraph 1 of Annex D of the Convention;</li> <li>F. Pesticide active ingredients and formulations listed by the Rotterdam Convention in its Annex III;</li> <li>G. Pesticides listed under the Montreal Protocol;</li> </ul> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<b>CRITERION</b>	<b>4.5 - To ensure hazardous chemicals and materials do not negatively impact biodiversity and ecosystem services</b>		

INDICATOR	Scope	Standard	Full indicator wording
<b>Summary comments - Indicator 4.5.1</b>			
	<b>Indicator:</b> None		<b>Guidance:</b> Question: Is a bio-bed similar to a containment basin? Please provide specifications for a bio-bed.
4.5.1 Management of storage facilities and safe handling and disposal of chemicals, fuel, lubricants and hazardous materials, with the objective of preventing negative impacts to biodiversity and ecosystems	Mill Agriculture  CORE INDICATOR	<u>100%</u>	Agrochemicals and other chemicals are safely stored, access is restricted to the sole users, storage area is ventilated and allows for spillage management (such as a retention pond, etc) The operator must ensure that Agrochemicals and Fertilisers are stored securely on its supplying farms and in a manner that prevents unauthorised access and protects the environment in the event of spillage.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 4.5.2</b> Only one comment received, highlighting that the indicator does not determine the number of hours and frequency of training.			
	<b>Indicator:</b> - Specify the minimum number of hours and frequency of training to fulfil this criterion		<b>Guidance:</b> - Reflect the training hours and frequency in the guidance as well

<p>4.5.2 Specific training for handling and correct use of farm chemicals, fuel, hazardous materials, and record keeping of training and use.</p>	<p>Mill Agriculture</p>		<p>All workers - that handle or come into contact with farm chemicals, fuel, hazardous materials are trained, and at least one worker in each field group is trained in first aid. Training is conducted by a competent professional on safe management of these substances.</p> <ul style="list-style-type: none"> <li>a) Training is specific and relevant to the task(s) performed.</li> <li>b) An explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to farm chemicals, fuel, hazardous materials all substances to be used.</li> <li>c) Techniques for correct handling of these substances.</li> <li>d) Correct use of PPE.</li> <li>e) Preventative measures for reducing possible damage to health and the environment caused by the substances.</li> <li>f) Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances.</li> <li>g) Records of training are maintained, where appropriate on an individual basis.</li> </ul> <p>Record keeping of all use of farm chemicals, fuel, hazardous materials and reports. records are accurate, complete, up-to-date and accessible.</p> <ul style="list-style-type: none"> <li>h) All records shall be kept a minimum of two years</li> </ul> <p><i>For more information, see <a href="#">Guidance</a></i></p>
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*PRINCIPLE 5 - CONTINUOUSLY IMPROVE OTHER KEY AREAS OF THE BUSINESS*

Operators are expected to implement Principle 5 for continuous improvement according to the following timeline:

<b>Year of certification</b>	<b>% P5 indicators</b>
First certification audit	-
Surveillance audit 1	20%
Surveillance audit 2	40%
Recertification audit	60%
Surveillance audit 1 onwards	80%

CRITERION	5.1 To promote economic and social sustainability		
INDICATOR	Scope	Standard	Full indicator wording
<b>Summary comments - Indicator 5.1.1</b> Majority of comments received is on clarification. There is one request to exclude farmers from the criterion scope.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Suggestion to include 'when applicable' in the indicator text</li> <li>- Timeframe allowed for plan development is unclear - 1 year, 5 years, 10 years?</li> <li>- Need clarity on how compliance with this indicator can be proven – is it when a plan is developed or when the plan's objectives are met?</li> <li>- Need to clarify whether innovation is for the industry or for the company.</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Need clarification on whether for large groups with more than one certified unit, if this plan can be developed at the company group level or does it have to for each certified unit of the Operator.</li> <li>- Request to exclude farmers from scope. Farmers' focus is on agricultural production and not on research and development. Research and development are carried out by research organizations, universities, private companies, associations and cooperatives</li> </ul>
	5.1.1 Research and innovation plan in place	Mill Agriculture	Yes
<b>Summary comments - Indicator 5.1.2</b> Not many comments received for this indicator. Concern raised over how information covered in this indicator will later be used. Indicator does not represent something grounded for the economic pillar in the business. It is a calculation only for Bonsucro and does not represent economic sustainability. One participant raised that this criterion should not be a requirement for producers since they have no control over product prices and exchange rate variation (particularly relevant for Brazil). The use of insums takes into account technical components and should not be overlooked in meeting this indicator. It was also raised that this criterion may conflict with minimal productivity indicator.			

	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- There is still some confusion over the calculation method and elements included in the formula</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Suggestion to make it more graphic and put a more detailed list of examples of what goes into the calculation and what does not</li> </ul>
5.1.2 Value added per tonne cane	Mill Agriculture	Mill >14; \$/t cane Agric >10 \$/t cane  Rationale to change from v4: Certification data showed that the added value was actually closer to these new figures which is why they have been brought up	Value added by the operation is the value of sales less the price of goods, raw materials (including energy) and services purchased.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 5.1.3</b> Several participants felt that this indicator is not required as the requirement is already covered in Principles 1 and 4.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Suggest to remove/streamline as the indicator does not add value to what is already covered in Principles 1 and 4.</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Note that this indicator would incur an increase in expense in order to implement the type of ESIA as per the IFC 2018.</li> </ul>

	<ul style="list-style-type: none"> <li>- Clarification needed on whether this applies only to certified area or entire operation</li> <li>- Suggested wording: "Environmental and social impact management plans updated every two years that clearly document how previously identified risks are managed."</li> <li>- The Environmental and Social Management Plan should be comprehensive and include all the actions of the plans of this new Standard, when applicable, except those that, due to their nature, must be evaluated for their feasibility for this Standard (plan for the evaluation of aspects and impacts 1.2 .2, water resources plan 4.3.1).</li> </ul>		<ul style="list-style-type: none"> <li>- Contradiction in the confidentiality requirements – on one hand, it is requested that the affected communities be made known and on the other, confidential information is not disclosed. All PGA progress is confidential.</li> </ul>
5.1.3 Environmental and social impact Management Plans updated biannually	Mill Agriculture	Yes	<p>Environmental and Social Management Plans are periodically updated, clearly documenting how previously identified risks are managed.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 5.1.4</b>          Not many comments received. Some wording suggestions and request for clarification. A couple of comments requesting that the scope is limited to the unit of certification.</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- This indicator is unclear and does not match its description. It is very similar to what is asked in Principle 1</li> <li>- Too many aspects are covered in this indicator - stakeholders, environmental and social issues. They should be addressed separately.</li> <li>- The indicator scope should be limited only to the certification area and not to the entire supply area.</li> <li>- Concerns raised over the minimum requirement for 90% of positive resolutions, since this is beyond the control of the operator.</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Question: The guidance for this indicator mentions a "Continuous Improvement Plan", where does this plan come from? Was it requested in another indicator, or should it be developed for this indicator?</li> </ul>

	<p>- Suggested wording: "Internal and external audit processes demonstrate that improvements in the systems are continuous; records of stakeholder, worker, and customer complaints demonstrate ongoing management of relationships with workers, communities, and customers; environmental, social, quality and productivity control data demonstrate continuous improvement."</p>				
5.1.4 Findings of business context analysis continuously addressed in a time-bound manner	Mill Agriculture	90%	<p>Internal and external review processes demonstrate that systems improvements are ongoing; Stakeholder, worker &amp; client grievance logs demonstrate ongoing management of relationships with workers, communities and clients; Environmental, social, quality and productivity monitoring data demonstrate continuous improvement.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>		
<b>CRITERION</b>	<b>5.2 To reduce emissions and effluents. To promote recycling of waste streams where practical</b>				
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>		
<p><b>Summary comments - Indicator 5.2.1</b>  Moderate number of comments received. Many comments were around the relevance of measuring ambient air quality because there are many other factors impacting air quality that is beyond the operator's control and influence to change. Some questions raised for clarification as well.</p>					
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Indicate which processes will require air quality measurement based on the respective national legislation and authorized parameters</li> <li>- Suggested wording: "These values are for ambient air (not emissions) as a 24-hour average for PM and SO<sub>2</sub>, and as a yearly average for NO<sub>2</sub>"</li> <li>- Define what is meant by 'nearest' populations/communities i.e. the distance/area of coverage</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- To include having a map of the nearest areas for periodic evaluation in accordance with regulations and laws</li> <li>- Suggested wording: "PM<sub>10</sub>, NO<sub>x</sub> and SO<sub>x</sub> should be controlled by passive sampling placed in residential and high traffic areas. When these parameters are not met, the operator must submit an action plan to improve air</li> </ul>		

	<ul style="list-style-type: none"> <li>- Air quality may be impacted by operations other than the ones carried out by the certified operator. What is the purpose of the monitoring since several external factors beyond the control of the operator can influence the results? The monitoring will also entail high cost for the operator who would need to engage a 3<sup>rd</sup> party to carry out the checks and the results will not reflect the operator's own impact on the ambient air quality.</li> <li>- Question: In some cases, these data is presented and share by environmental agencies. For instance, in the state of one of the participants, survey data of the aerial basins of the different regions is readily available – can this be used as a reference for this type monitoring?</li> </ul>		<p>quality (may include collaborative efforts with the government and other companies, if applicable)."</p> <ul style="list-style-type: none"> <li>- According to the recommendations of the first public consultation in which it was suggested to comply with the applicable legislation, and which was accepted in the standard, the same must be approved in the implementation guide.</li> </ul>
<p>5.2.1 Operators have a documented monitoring and evaluation system for ambient air quality in nearest populations / communities.</p>	<p>Mill</p>	<p>Documented monitoring of PM10, NOx and SOx emissions</p>	<p>Operators monitor ambient air (not stacks emissions) in nearest populations/communities as a 24hr mean for PM and SO<sub>2</sub>, and as an annual mean for NO<sub>2</sub></p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>
<p><b>Summary comments - Indicator 5.2.2</b> Not many comments received. Most on questions and clarification such as on measurement methodology and what would be considered 'Best Available Technology'</p>			
	<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Clarify the term 'Best Available Technology'. It is currently too ambiguous and can have different interpretations. In addition, this has significant economic impact.</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- According to the recommendations of the first public consultation in which it was suggested to comply with the applicable legislation, and which was accepted in the</li> </ul>

	<ul style="list-style-type: none"> <li>- Align the indicator with the calculation methodology. The calculator methodology does not go into the measurement of emissions itself, but the consumption of insums, so this indicator will not reach its objective</li> <li>- Question: The requirements for monitoring atmospheric emissions by environmental agencies for fixed sources are generally the emissions of boilers and generators (CO2 emission). For mobile sources (diesel powered motor vehicles) black smoke is being measured using the Ringelman scale. Is this valid? In addition to monitoring, how should structural adjustments for reducing atmospheric emissions be demonstrated? If the operator has an inventory of its emissions – can GHG be used as a reference?</li> </ul>	<p>standard, the same must be approved in the implementation guide.</p>	
<p>5.2.2 Fugitive and point-source air emissions align with Best Available Technology and established safety/ environmental parameters</p>	<p>Mill</p>	<p>Evidenced by adherence to licenses AND documented emissions management</p>	<p>Operators can directly measure and report emissions or alternatively demonstrate Emission Estimation Techniques (EETs) as appropriate to the operation if they can demonstrate the use of Best Available Technologies (BAT) for their local operation/context.</p> <p>EETs include:</p> <ul style="list-style-type: none"> <li>· sampling or direct measurement; (commonly used for point-source emissions)</li> <li>· mass balance;</li> <li>· fuel analysis and/or other engineering calculations; and</li> <li>· emission factors (most commonly used for fugitive emissions from operations)</li> </ul> <p><i>For more information, see <a href="#">Guidance</a></i></p>
<p><b>Summary comments - Indicator 5.2.3</b></p>			

	<b>Indicator:</b> None		<b>Guidance:</b> None
5.2.3 Non-production waste plan for safely recycled or disposal	Mill Agriculture	Minimum 50%	The operator has a plan and implements recycling / re-using / safe & responsible disposal or storage (if other options are not available) programme for all of the following categories: fibre, metal, plastic, oil and lubricants, batteries and chemical products, rubber, wood, hazardous waste, glass, medical waste and electronics.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>CRITERION</b>	<b>5.3 To train workers and other workers in all areas of their work and develop their general skills</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
<b>Summary comments - Indicator 5.3.1</b> Some concerns raised around frequency of training which and the minimum requirement of 16 hours.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- the 1% turnover that appears in the current version should continue to be counted on. <i>(Note: it is not clear where in the indicator and/or guidance text this comment refers to)</i></li> <li>- Training costs are not taken into account – consider the possibility of carrying out these trainings at longer intervals between them, instead of being every year.</li> <li>- Clarification needed on whether health and safety training can be included in these 16 hours</li> </ul>		<b>Guidance:</b> <ul style="list-style-type: none"> <li>- There is an inconsistency between the indicator and the guidance with regards to the 16-hour requirement. The indicator states “average of 16 hours” whereas the guidance states “16 hours per worker”.</li> </ul>
5.3.1 Time spent by workers in vocational training sessions	Mill Agriculture	Average 16 hours per year (or full time equivalent of 16 hours per year)	The operator provides an average of 16 hours of training for vocational and/or occupational skills training to all workers. Training days are split between basic workers, intermediate management and upper management. A training plan is prepared ahead of each harvest or cutting cycle (in cases where the harvest or cutting cycle is continuous, the training plan is annual).  <i>For further information, see <a href="#">Guidance</a>.</i>

CRITERION			
5.4 Continuous improvement of worker welfare			
INDICATOR	Scope	Standard	Full indicator wording
<b>Summary comments - Indicator 5.4.1</b> Moderate number of comments received. Main pushback is against extending the scope to the whole supply area and to limit it to the certified area. Main concern is around the lack of control and influence the operator has over the management of the farmers. Content of comment is similar as raised in other areas that the complexity and high cost of the standard is not economically viable and will discourage operators from pursuing certification.			
	<b>Indicator:</b> <ul style="list-style-type: none"> <li>- Provide greater clarity regarding the scope of the area covered by the indicator and on the actions that operators are expected to take.</li> <li>- Limit the scope of indicator to the certified area</li> <li>- Suggested wording: "The operator shall promote a safe working environment at its sugarcane supply base."</li> <li>- Question: Will reports/documents (e.g. ergonomic report, assessment of hazards, health and safety risks) be required in addition to the PPRA/PCMSO themselves? Implementation in accordance with the Bonsucro standard will require from investment of resources and time from the mill, especially with regards to sugarcane suppliers since it requires a cultural change and therefore requires a longer time for adoption.</li> </ul>	<b>Guidance:</b> <ul style="list-style-type: none"> <li>- Provide examples on how operators can promote safer workplaces, e.g. campaigns, prevention programs, etc.</li> </ul>	
5.4.1 - Occupational health and safety is promoted in the whole cane supply area.	Whole supply area	Yes	The operator promotes a safe working environment at its sugar cane supply base.  <i>For further information, see <a href="#">Guidance</a>.</i>
<b>Summary comments - Indicator 5.4.2</b>			

<p>Moderate number of comments received. Main pushback is against extending the scope to the whole supply area and to limit it to the certified area. Main concern is around the lack of control and influence the operator has over the management of the farmers. Content of comment is similar as raised in other areas that the complexity and high cost of the standard is not economically viable and will discourage operators from pursuing certification.</p>				
		<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Limit scope of indicator to the certified area</li> </ul> <p>Suggested wording: "The certified company must promote accommodation according to minimum legal standards in its sugarcane supply base."</p> <ul style="list-style-type: none"> <li>- Clarify what is meant by "promote" in the context of this indicator</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Suggested wording: "The operator is advised to carry out an evaluation of the existing accommodation facilities. The diagnosis must meet the minimum legal standards for accommodation. In the absence of country legal requirements for worker accommodation, the operator should refer to recommendation No. 115 of the ILO Guide on accommodation for workers."</li> </ul>
5.4.2. Safe worker accommodation in cane supplier area	Whole supply area	Yes	<p>The operator promotes minimum legal standards for accommodation on its sugar cane supply base.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>	
<p><b>Summary comments - Indicator 5.4.3</b></p> <p>Moderate number of comments received. Majority of the comments received is around the practicalities of setting a 15% minimum target. Some clarification is needed on the scope and expectations for this indicator.</p>				
		<p><b>Indicator:</b></p> <ul style="list-style-type: none"> <li>- Suggested wording: "The operator will need to conduct training to empower women in the community. Recruitment operations increase the presence of women in the workplace to meet the objectives set in the operation of no less than 15% of the total workforce"</li> <li>- Clearly define the scope of this indicator (e.g. covers both Administrative and Operational Functions).</li> <li>- Clarify whether the minimum 15% target of women in the workforce is related to the total workforce (according to indicator descriptive text) or in technical and management areas (as mentioned in the guidance).</li> </ul>		<p><b>Guidance:</b></p> <ul style="list-style-type: none"> <li>- Suggestion: As there are many different realities, the indicator could be the fulfilment of a plan to increase the % of women in the various forms of work and not a fixed minimum value.</li> </ul>

	<ul style="list-style-type: none"> <li>- Suggest that the standard requires a commitment to progressively close the gaps that exist, instead of a fixed percentage. The hiring must be for meritocracy and not for meeting a quota.</li> <li>- Clarify what is expected of the training and how it is expected to be managed in the areas surrounding the plantations.</li> <li>- Review the minimum 15% target in terms of feasibility for operators to meet it</li> <li>- Clarify the timeframe given to operators to meet this indicator. Should it be something for progressive implementation?</li> </ul>		
5.4.3. Gender inclusion in management and technical positions	Mill Agriculture	15%	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator conducts community-based women's empowerment training. Recruitment operations increases women's presence in the workforce to meet operation established targets not less than 15% of total workforce.</p> <p><i>For further information, see <a href="#">Guidance</a>.</i></p>