

# Report to the European Commission for Calendar Year 2023

According to Article 30 (5) of  
Directive (EU) 2018/2001  
Submitted on 11 July 2024

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## 1. About Bonsucro

Bonsucro is a not-for-profit organisation setting the standards for sustainable production of sugarcane. It is a community of change composed by over 300 members from farmers, mills, NGOs/civil society, traders and end users.

Over 7% of the world's sugar from sugarcane is certified against Bonsucro's leading reference framework, the Bonsucro Production Standard.

Bonsucro's mission is to collectively accelerate the sustainable production and uses of the largest agricultural commodity in the world – sugarcane. Bonsucro aims to achieve this by creating value across the supply chain; improving the environmental impact of sugarcane; and strengthening human rights & decent work in sugarcane farming & milling.

Bonsucro acts as a platform for change. It supports knowledge creation and transfer which, combined with the right resources, investments, and incentives, drives improvement in the sugarcane sector. This creates confidence and trust that change is happening and generates insights that help refine improvement programmes.

## 2. Introduction

Pursuant to Article 30(5) of the Directive (EU) 2018/2001, hereafter RED II, all recognised voluntary schemes shall submit annually by 30 April an activity report to the European Commission (EC). The report shall cover the preceding calendar year.

This applies only to voluntary schemes that have operated for at least 12 months.

The structure and content of the annual activity reports provided for in Article 30(5) of Directive (EU) 2018/2001 shall follow the minimum requirements set out in Annex III of the Implementing Regulation 2022/996 about the operation of the voluntary scheme and an additional report with data shall be supplied separately in a format to be determined by the Commission related to certified feedstock and biofuels quantities by country of origin and type of feedstock.

Bonsucro report covers data (reporting period) from 01 January 2023 to 31 December 2023 based on the best information available.

### 3. Annual Activity Report

- (a) rules on the independence, method and frequency of audits as approved by the Commission upon accreditation of the voluntary scheme and any changes to them over time to reflect Commission guidance, the modified regulatory framework, findings from internal monitoring on the auditing process of certification bodies and evolving industry best practices.

#### Independence

To ensure independence and avoid conflicts of interest, Bonsucro works with independent third parties (Certification Bodies (CBs)) accredited on ISO 17065 and, when applicable, on ISO 14065 as audit providers.

Bonsucro has an agreement with the CBs laying down the rules to both Parties and referring to the applicable Bonsucro scheme documents, for example, the “Bonsucro Accreditation and Oversight Procedure”, which details the procedure to become a licensed CB under the Bonsucro scheme and the “Bonsucro Certification Protocol” which lays down the audit and certification rules and the CB staff required competence.

The Bonsucro EU-RED Standard, section 6, lays down requirements for the CBs and the Bonsucro EU-RED certification process that are additional to the other Bonsucro documents mentioned above.

One of them is that the CB shall have a process for selecting and appointing personnel for the certification activities with the appropriate competence, independence and impartiality. Bonsucro auditors must be free of conflicts of interest, independent of the audited economic operator and not be influenced/pressured by other interested parties (internal and external).

Furthermore, CBs and auditors are subject to the Bonsucro monitoring of their performance, which is carried out using 03 main mechanisms that are the review of the audit documents by a Bonsucro member of the Assurance Team, and at least one head office assessment per year and one witness assessment per year performed by ASI – Assurance Services International an independent Assurance Provider.

In 2023, Bonsucro worked with 07 independent [Licensed Certification Bodies](#).

The licensed CBs are listed on the Bonsucro website with information on a contact, technical and geographical scope, date of licensing, and, if applicable (and when applicable), information on CBs that are no longer entitled to conduct audits under the Bonsucro scheme. At the moment, Bonsucro is pleased to report that no CB has had its license revoked in the last twelve months.

### Method and Frequency of audits

The [Bonsucro Certification System](#) applies to sugarcane farms, mills and operators in the supply chain.

Audits in the Bonsucro Certification System happen every year during the 03-year validity of a certificate (certification cycle). Every economic operator is required to pass a full Initial audit, followed by two surveillance audits (in the 02 subsequent years), and if the economic operator wishes to stay certified, at the end of the 03 year period, a recertification audit shall be carried out before the expiration of the actual certification cycle.

The audits take place in loco, with a team of qualified auditors from an independent Licensed CB visiting the economic operator unit of certification to assess compliance of the economic operator with the [Bonsucro Standards](#) through the use of the Bonsucro Calculator and following the [Bonsucro Certification Protocol](#).

The audit results will be reviewed by the CB staff and a certification decision shall be taken by someone not involved in the audit activities.

If the economic operator is found in compliance, and a positive decision is taken, the CB will issue a certificate or maintain the certification, and if negative, suspend or withdraw the certificate.

The audit results shall be sent to the Bonsucro Assurance Team as part of the CB performance monitoring, which will perform an internal review of the process, quality, etc.

Bonsucro is a full member of the [ISEAL Alliance](#), a global organization setting standards for standard-setting organizations. ISEAL conceptualises and maintains codes that help ensure voluntary schemes' credibility, transparency and effectiveness. ISEAL's mission is to strengthen sustainability standards to benefit people and the environment.

Bonsucro has been independently assessed and found compliant with all [ISEAL Codes of Good Practice](#) (which cover best practices for standard-setting, assurance, and impact evaluations)

(b) rules and procedures for identifying and dealing with non-compliance by economic operators and members of the scheme.

There are two ways in which non-compliance can be found and dealt with within the Bonsucro Certification System:

### Audit result

To be certified against the [Bonsucro Production Standard](#), the economic operator must comply with 100% of the core indicators (covering legal compliance, basic human and labour rights, agrochemical applications, protection of high conservation value areas, amongst others) and at least 60% of the non-core indicators in the Standard.



For the [Bonsucro Mass Balance Chain of Custody Standard](#) and the [Bonsucro EU RED Standard](#), the economic operator must comply with all indicators.

Bonsucro has the following non-conformity level grading for the Bonsucro EU-RED Standard:

**Critical** nonconformity shall include but are not limited to:

- non-compliance with a mandatory requirement of RED recast, such as land conversion, which contravenes Article 29(3), (4) and (5) of that Directive;
- fraudulent issuance of proof of sustainability, for example, intentional duplication of proof of sustainability to seek financial benefit;
- the deliberate classification as ‘bagasse’ of crops and residues which are not bagasse, with the intention to use these materials as a feedstock for the production of bagasse-derived biomass fuels. For example, by classifying agricultural residues from sugarcane cultivation or milling as bagasse (e.g. leaves and tops).

**Major** nonconformity: failure to comply with a mandatory requirement of RED recast, where the non-conformity is potentially reversible, repeated, and systematic problems, or aspects that alone, or in combination with further non-conformities, may result in a fundamental system failure.

**Minor** nonconformity: a non-conformity that has a limited impact, constitutes an isolated or temporary lapse, is not systematic and does not result in a fundamental failure if not corrected

The consequences of non-conformities for economic operators shall be the following:

- a) In the case of critical non-conformities: The economic operator applying for Bonsucro EU-RED certification shall not be issued a certificate.
  - The economic operator may re-apply for certification after 12 months.
  - Critical non-conformities identified during surveillance or re-certification audits or through Bonsucro’s internal monitoring or complaints process shall lead to the immediate withdrawal of the economic operator’s Bonsucro EU-RED certificate (see Bonsucro Certification Protocol V6 part 2 paragraph 23.9);
- b) In the case of major non-conformities against a mandatory RED recast requirement: The economic operator applying for Bonsucro EU-RED certification shall not be issued a certificate.
  - Major non-conformities against a mandatory requirement of RED recast identified during surveillance or re-certification audits or through Bonsucro’s internal monitoring or complaints process shall lead to the immediate suspension of the economic operator’s certificate.
  - Where economic operators do not remedy any major non-conformities within three months of notification, the Bonsucro EU-RED certificate shall be withdrawn.

- Major non-conformities raised against other requirements (i.e. not mandatory requirements of RED II) shall follow the process defined in Bonsucro Certification Protocol V6 part 2 section 19.
- c) In the case of minor non-conformities:
- Bonsucro will define the time period for their resolution, not exceeding 12 months from their notification and the date of the next surveillance or re-certification audit. See Bonsucro Certification Protocol V6 part 2, section 19.

### Comments and Complaints

Bonsucro has developed and maintained two public procedures that enable the identification of potential non-compliance of certified members by any interested stakeholder.

The first one is a [30-day public consultation](#) and [due diligence period](#) for every new membership application into Bonsucro (a pre-requirement for certification).

The membership application Comments' Process:

- Any interested stakeholder may submit comments on the applicant's records and behaviour in relation to the Bonsucro [Code of Conduct](#), and negative comments may lead to a formal review by the Membership Due Diligence Committee and/or Bonsucro Board of Directors before its membership application is processed;
- Within the 30-day candidacy period, Bonsucro will also carry out an appraisal of the information submitted through the application form (due diligence), and Bonsucro retains the right to carry out all the necessary checks and request any additional information from the applicant.

Besides the comments' process for new applications, Bonsucro also enforces a [Complaints Resolution Process](#), which covers the following types of complaints:

- Complaints regarding a Bonsucro;
- Complaints against a Bonsucro certificate holder or applying for certification;
- Complaints about Bonsucro Licensed Certification Body (including its personnel);
- Complaints against Bonsucro (actions or decisions of an individual Bonsucro Director, committee members or staff).

The experience with the complaints system has enable Bonsucro to constantly improve it. [Decisions on complaints](#) by the Bonsucro Board are made public.

(c) [evidence of fulfilling the legal requirements on transparency and publication of information in line with Article 6.](#)

All information related to Bonsucro as a scheme can be found on [Bonsucro's website](#).

[Bonsucro Governance](#) structure and information (roles, composition, experience, voting rights, etc.) about it is easily accessible on the Bonsucro website.

At the moment, this is the Bonsucro governance structure:



*Bonsucro's governance structure. Ex-officio Directors sit on the Board due to their roles in other governing bodies. NB: in 2024 the Technical Advisory Board changed its name to the Technical Advisory Council.*

The list of [certified economic operators](#) is publicly available and automatically updated. The list contains information on the name, certification status, date of first certification and validity, the certificate number, suspension and withdrawal dates, scope (standard, products and activities), etc.

The result can also be visualised through an interactive map.

Scheme documents are easily accessible online. The [Bonsucro Production Standard](#) and the [Bonsucro Chain of Custody Standard](#) are available online and translated into Portuguese and Spanish (two major languages of sugarcane-producing countries and where demand for certification is the highest). The [Bonsucro EU-RED Standard](#) is only available in English at the moment.

Other documents can be found at the Bonsucro [Public QMS Library](#) or on the [Certification Tools](#) page.

Bonsucro also has an area dedicated to contact on its website, including information on address and phone.

A list of Bonsucro [Licensed Certification Bodies](#) can be found on the website, along with their contact and licensed scope information. If a CB is no longer entitled to conduct audits under the Bonsucro scheme, the revoked licenses will also be published in the same area on the website.



- (d) stakeholder involvement, in particular on the consultation of indigenous and local communities prior to decision-making during the drafting and review of the scheme as well as during audits and the response to their contributions.

Bonsucro complies with the ISEAL Standard-Setting Code, which requires extensive consultations with stakeholders when developing and/or revising its standard. This is captured in the [Standard Development and Revision Procedure](#) and is available online. This particularly includes mapping and facilitating the participation of vulnerable communities or those that may be affected by the operations of sugarcane producers and millers.

Bonsucro also promotes stakeholder consultations and involvement at the operator level through the use of the Free, Prior and Informed Consent (FPIC) principle. Certified operators are required to map their stakeholders and engage them in consultations when decisions that can affect them are under discussion. They must also design and implement the channels and mechanisms to deal with complaints and conflicts in a transparent, proactive and fair manner.

During certification audits, auditors have the possibility to seek evidence of compliance by engaging and liaising with stakeholders.

- (e) overview of the activities carried out by the voluntary scheme in cooperation with the certification bodies in order to improve the overall certification process and the qualification and independence of auditors and relevant scheme bodies.

To improve the certification process, and staff qualification and independence(not only auditor), Bonsucro works closely with the CBs, making available on its website a training platform and webinars that are accessible to everyone with exams for the CB staff, realising annual meeting with the Licensed CBs to calibrate information, interpretations, clarify doubts, etc., considering the CBs as one important stakeholder and consulting them during Bonsucro’s Standards revision and certification procedure revision, and during the development of some tools as for example the Bonsucro Calculator.

Bonsucro is open and incentivises the CBs to contact the Bonsucro Standards and Assurance team when needed, maintaining open and transparent communication.

Bonsucro endeavours to provide as much information as possible and to calibrate it to have a robust and consistent audit and certification procedure.

- (f) market updates of the scheme, the amount of feedstock, biofuels, bioliquids, biomass fuels, recycled carbon fuels and renewable fuels of non-biological origin, all certified, by country of origin and type, and the number of participants.

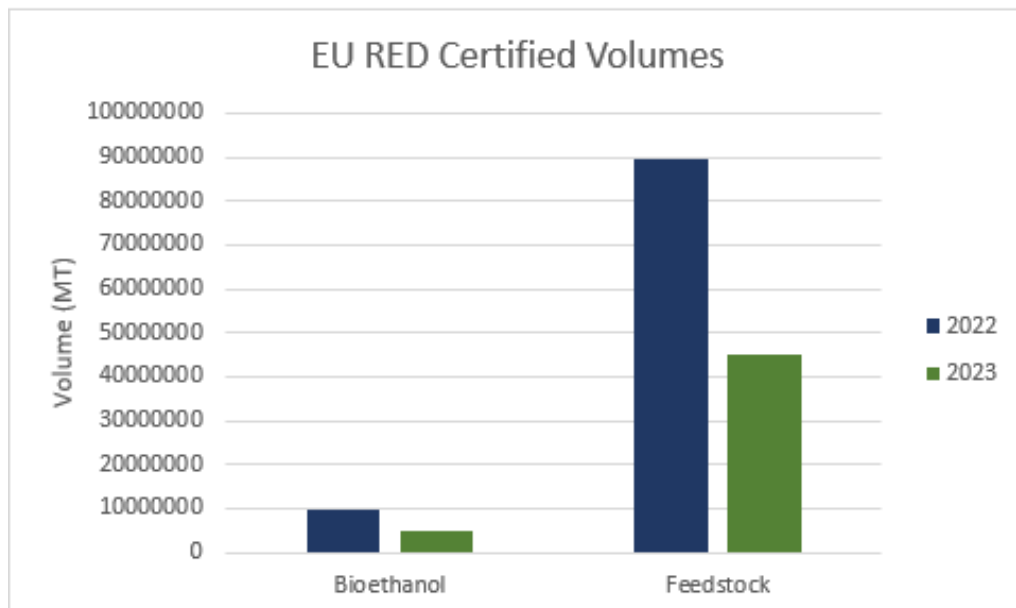
The collected data was presented in the spreadsheet “EU RED VS-Data reporting\_Bonsucro\_Calendar Year 2023” submitted, including the quantities of feedstocks (raw materials) and biofuels certified under Bonsucro by country of origin and type.

Below is the record of EU-compliant biofuel production within the Bonsucro Certification System for 2021 and 2022. The final 2023 values are still open since Bonsucro is still receiving data related to 2023.

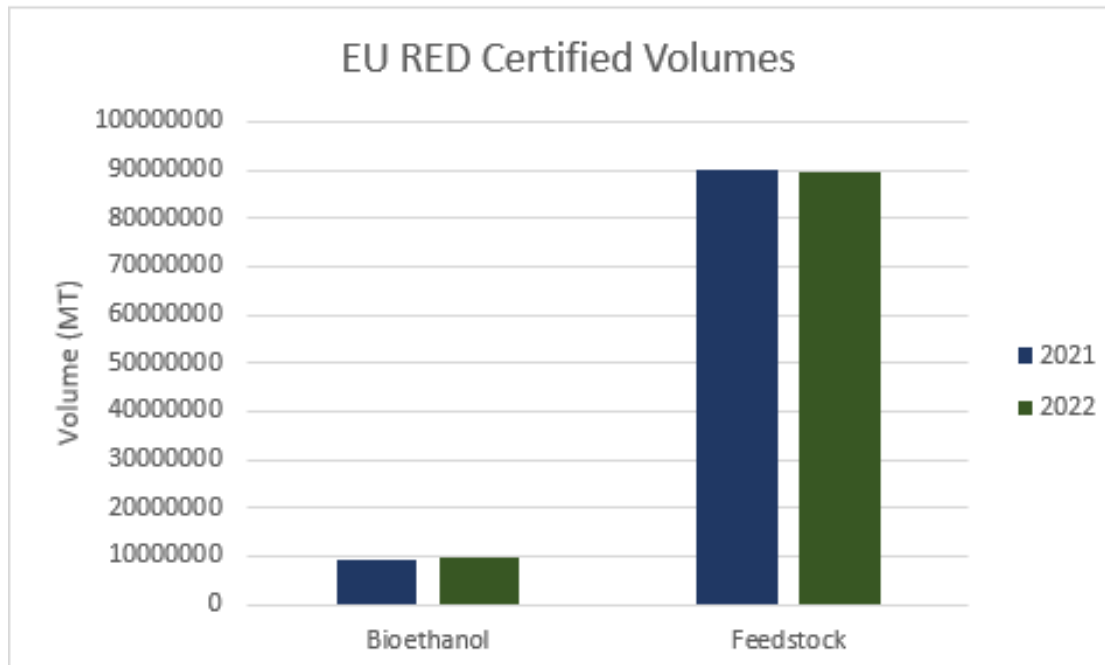
To date there are 122 certified operators (EU-RED certifications and non-EU-RED certifications) in 10 countries, the production numbers below refer to 86 operators in 6 countries (EU-RED certifications only).

Type of product	Country of origin	Feedstock	Calendar year	Value (tonnes)
Bioethanol	Bolivia	Sugar cane	2022	27355.63
Feedstock	Bolivia	Sugar cane	2022	772722.31
Bioethanol	Brazil	Sugar cane	2022	3908822.60
Bioethanol	Brazil	Bagasse	2022	5467409.20
Feedstock	Brazil	Sugar cane	2022	80655064.00
Bioethanol	Colombia	Sugar cane	2022	58455.93
Bioethanol	Colombia	Bagasse	2022	390589.79
Feedstock	Colombia	Sugar cane	2022	3757077.00
Feedstock	Ecuador	Sugar cane	2022	110874.69
Feedstock	El Salvador	Sugar cane	2022	991853.16
Bioethanol	Guatemala	Sugar cane	2022	5853.18
Feedstock	Guatemala	Sugar cane	2022	571957.00
Feedstock	Nicaragua	Sugar cane	2022	1132496.60
Feedstock	Thailand	Sugar cane	2022	1402319.20

In total, 45218074.15 metric tons (MT) of raw materials and 4730657.60 MT of final biofuels (excluding gaseous biofuels) were reported to Bonsucro in this framework. This reflects a change of -52.01% for raw materials and -49.41% for final biofuels when compared to the 2022's values.



In total, 9858486.338 metric tons (MT) of raw materials and 89394363.969 MT of final biofuels (excluding gaseous biofuels) were reported to Bonsucro in this framework. This reflects a change of +4.8% for raw materials and -0.80% for final biofuels when compared to the 2021's values.



Limitations to be taken into account in relation to the data:

The volume data presented here comprises a combination of actual figures and estimates. Estimates have been included where actual data is unavailable.

- (g) overview of the effectiveness of the implementing system put in place by the governance body of the voluntary scheme in order to track proof of conformity with the sustainability criteria that the scheme gives to its member(s). This shall cover, in particular, how the system effectively prevents fraudulent activities by ensuring timely detection, treatment and follow-up of suspected fraud and other irregularities and where appropriate, the number of cases of fraud or irregularities detected.

Certification against Bonsucro's Chain of Custody Standard is required for producers and every actor in the supply chain who trades Bonsucro-certified products. The main objective of the Chain of Custody Standard is to ensure that an appropriate and effective system is implemented by the operator to track and trace certified material not only within its operations but also from its suppliers and its clients. This ensures that claims around the sustainability characteristics of Bonsucro-certified products are truthful, accurate and traceable. It brings further credibility and transparency in the marketplace.

The system is operated by each individual actor in the supply chain and verified annually by independent certification bodies. Trade data is confirmed by the independent certification bodies and securely stored by Bonsucro.

To date, no cases of fraud or irregularities have been detected.

(h) **criteria for the recognition of certification bodies.**

The criteria for recognition (licensing) of certification bodies (CBs) are described in the [Bonsucro Accreditation and Oversight Procedure](#) and includes the following clauses (in summary):

#### **4 ACCREDITATION CRITERIA**

4.1 Certification can only be granted by a CB that has been accredited by Bonsucro and has a valid Accreditation Agreement with Bonsucro. Bonsucro reserves the right to make changes to the accreditation process provided that reasonable notice is given as stipulated in the Accreditation Agreement.

4.2 The CB shall be accredited or comply with ISO 17065. The CB shall conform to Bonsucro requirements in case of a conflict with ISO17065.

4.3 Accreditation against ISO 14065:2013 and experience in carrying out audits in conformity with ISO 14064-3:2006 is recommended but not mandatory.

4.4 The CB shall ensure that:

- a. there is a mechanism to safeguarding impartiality through a documented impartiality structure within the CB operations.
- b. internal audits are carried out at least every 12 months to verify the fulfilment of applicable requirements and to evaluate if the management system is effectively implemented and maintained.
- c. there are documented procedures for preventing, reviewing and determining timely and appropriate responses to any declarations of potential conflict of interest made. These procedures shall ensure that the declared potential or actual conflict of interest does not influence the actions or decision of the CB.

4.5 Once accredited, the CB shall inform Bonsucro of any changes to its organisation that may affect the accreditation scope, such as changes to personnel (employed auditors and contractors), geographic location and status of existing and relevant accreditations.

#### **5 ACCREDITATION PROCESS**

##### **5.1 Application**

5.1.1 Upon receipt of an accreditation enquiry, Bonsucro shall send the latest version of the CB Application Form to the CB applicant and request the following documentation:

- a. An organisational chart indicating head and local offices.
- b. A list of countries where the CB wishes to offer Bonsucro audits. This list shall include the name of each local office, including contact details
- c. The name of the technical manager responsible for Bonsucro certification.
- d. The required proof of qualification of the technical manager, lead auditor, auditors and representative.
- e. Details of the Quality Management System (QMS) incorporating all of the requirements of the Bonsucro Standards and Bonsucro Certification Protocol.
- f. The scope of any valid, relevant accredited schemes.

## 5.2 Review of Application

5.2.1 When the application form and all required documentation have been returned, these shall be verified against the requirements in the Bonsucro Certification Protocol by a Bonsucro S&I staff.

5.2.2 Should the review prove unsatisfactory, Bonsucro may:

- a. Request further training of CB personnel.
- b. Request further documentary evidence as part of the application process.

## 5.3 Initial Assessment

5.3.1 Once the application has been approved, a desk review of the applicant CB QMS and a head office assessment as it relates to the application of the Bonsucro requirements shall be carried out. This may be carried out on-site or remotely. An assessment report with the conclusions shall be provided to the CB with possible non-conformities and observations.

5.3.2 Bonsucro shall inform the applicant CB that it will need to witness the first client audit in order to confirm and grant accreditation.

5.3.3 The witness assessment shall follow the steps described in this procedure, and an assessment report shall be prepared by Bonsucro and sent to the CB containing the conclusion of the assessment.

- (i) rules on how the internal monitoring system is conducted and the results of its periodic review, specifically on oversight of the work of certification bodies and their auditors, as well as on the system of handling complaints against economic operators and certification bodies.

The criteria for monitoring the licensed certification bodies (CBs) are described in the [Bonsucro Accreditation and Oversight Procedure](#) and includes the following clauses (in summary):

## 6 MONITORING CB PERFORMANCE

6.1 The ongoing monitoring of accredited CB performance will be carried out using three main mechanisms:

- a. The review of each CB audit report and Calculator by a member of the Bonsucro Standards and Innovation team.
- b. As a minimum, one witness assessment per year per accredited CB
- c. One head office assessment per year per accredited CB at the geographic location where the accreditation is held.

6.2 All assessment activities shall be performed by staff with auditing experience who have completed an ISO 9001 course or have attended introductory training on ISO 9001.

6.3 Bonsucro reserves the right to conduct monitoring and evaluation at any point in time, particularly in case relevant information on potential non-conformities has been brought to the attention of Bonsucro by external parties.

6.4 As described in the Bonsucro Certification Protocol, a major non-conformity may be issued to a CB when there is a failure to meet applicable requirements.

6.5 Major non-conformities identified shall be fully addressed and the conformity demonstrated, within a period of up to 3 months.

6.6 Minor non-conformities may be issued by Bonsucro to CBs when there is a failure to meet applicable requirements, but which can be considered a temporary lapse or is unusual/non-systematic.

6.7 Minor non-conformities shall be fully addressed, and conformity demonstrated within a period of up to 12 months.

6.8 Bonsucro reserves the right to carry out additional assessments to verify the effectiveness of the implementation of corrective actions.

## **7 REVIEW OF CB AUDIT REPORTS**

7.1 All CB client audit reports shall be reviewed by Bonsucro, and feedback shall be sent to the CB within five (5) working days from receipt of the report.

7.2 The audit report review by Bonsucro shall consider:

- a. The completeness of the audit
- b. Appropriateness of the grading of the non-conformities
- c. Appropriateness of sample selections (interviews and farms)
- d. Accuracy of the Calculator

7.3 As a result of audit report reviews, Bonsucro may request clarification, additional documentation or corrections to be made to audit reports.

## **8 HEAD OFFICE & WITNESS ASSESSMENTS**

8.1 The head office assessments may be held on-site or held remotely. The CB will be advised in good time on the type of head office assessment.

8.2 The sample for the witness assessments shall be chosen based on the following criteria:

- a. new auditor or new CB country of operation
- b. Client located in a country that has not been assessed by Bonsucro previously
- c. Information received by Bonsucro staff or others about the client or the CB
- d. Logistical considerations.

8.3 Prior to the assessment, the Bonsucro assessor must confirm that there are no conflicts of interest between Bonsucro and the CB by completing the Declaration of Interest Form.

8.4 The Bonsucro assessor should send the assessment plan at least two (2) weeks prior to the start of the assessment to the CB.

8.5 All assessments shall begin with an opening meeting between Bonsucro and the CB, where the scope and objectives are to be confirmed, including confidentiality and conflict of interest. The assessment results should be shared with the CB during a closing meeting between Bonsucro and the CB auditor at the end of the assessment.

8.6 After each assessment, an assessment report is to be sent to the CB within four (4) weeks of the end of the assessment with the non-conformities and observations issued and the deadline for their closure. The Bonsucro template assessment report should be used.

8.7 The non-conformities and observations must be copied into the CB Registry of NCs.



(j) possibilities to facilitate or improve the promotion of best practices.

Bonsucro is the global sugarcane platform, which includes developing global programmes to increase the uptake of sustainability practices in the sugarcane sector. Through its [training](#) programme and network of licensed training providers, Bonsucro promotes the exchange of sustainable production practices within the sugarcane sector. Bonsucro's [Training Platform](#) is open to the public and free to use, and our webinars cover a range of topics, including how to apply the UN Guiding Principles on Business and Human Rights

Bonsucro has promoted different [events](#) and [Technical Weeks](#) in key producing countries that are a great opportunity for local practitioners to get tougher and share insights and experience. They learn about practical ways to apply best practices in their operations and discuss different approaches.

Besides the Technical Weeks, Bonsucro also convenes [Bonsucro Global Week](#), one of the world's premier events for sustainability in sugarcane, designed to help economic operators explore how to drive sustainability in the sugarcane supply chain whilst celebrating the progress we have collectively made in the sector. Bonsucro Global Week is packed with dynamic discussions and opportunities for learning and networking with people from different countries who represent all areas of the sugarcane sector, including producers, traders, consumers, civil society, certification bodies, etc. These events also incorporate consultations when needed, site visits, and discussions about real cases of importance to economic operators.

Bonsucro invests in innovative projects at sugarcane origins through the [Bonsucro Impact Fund](#) (BIF), supporting projects that address critical sustainability challenges in the sector using income from the Bonsucro [Credit Trading Platform](#). Lessons learned from these projects are shared among the BIF grantee community to promote best practices. As projects complete their work, achievements and insights from BIF projects will be shared with the wider sugarcane sector.

Other related projects by Bonsucro to facilitate and improve best practices can be found on Bonsucro webpage, under the “impact” menu, for example, the [ClimateCane Tracker](#), the [Living Wage in sugarcane](#) and other [Climate action in sugarcane](#).

As a full and compliant member of ISEAL, Bonsucro collaborates and participates in several committees and groups with the objective of sharing and learning from best practices on assurance and standard-setting procedures.

Bonsucro has also aligned our strategic plan, standards, and activities with the sustainable development goals. The SDGs provide a framework for recognised interventions and best practices, so this alignment supports the promotion of effective approaches to sustainable development. Bonsucro members and certified producers can contribute to these global goals by engaging with our guidelines.

- (k) voluntary schemes certifying forest biomass must include information on the way the risk assessment required in Article 29(6) and (7) of the Directive (EU) 2018/2001 is made.

It is not applicable to Bonsucro since we do not certify forest biomass.