

# **Bonsucro Production Standard Transition Policy**

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Developed by: Standards and Assurance Approved by: Bonsucro Board			
Effective from: From 19 <sup>th</sup> October 2022, this document supersedes PO_Policy on the transition			
period to the Bonsucro Production Standard v5.1 (V1 – 28 <sup>th</sup> March 2022).			

#### Linked to:

- Bonsucro Production Standard v4.2
- Bonsucro Production Standard v5.1
- Bonsucro Certification Protocol v6
- Bonsucro Calculator v5.1.4 (and subsequent updates)
- Bonsucro Calculator v4.1.6

All applicable documents can be downloaded at <a href="https://bonsucro.com/certification-tools/">https://bonsucro.com/certification-tools/</a>

**Criterion / indicator / Requirements:** See the detailed list in this policy

**Applicable to:** Applicability varies according to the version of Bonsucro Production Standard (BPS): see the detailed list in this policy.

Regions: All Regions

# Main changes from the previous version

- Extended provisions for transition to BPS v5.1
- Additional provisions to support the extended applicability of BPS v4.2

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#### Introduction

The Bonsucro Production Standard (BPS) v5.1 was published on 17<sup>th</sup> January 2022 to replace BPS v4.2. This updated version helps Operators (farmers and mills) to meet current social and environmental challenges. From 1<sup>st</sup> September 2022, BPS v4.2 was formally phased out, and BPS v5.1 became mandatory for all audits.

On 19<sup>th</sup> October 2022, Bonsucro, as instructed by its Board of Directors, extended the validity date of BPS v4.2 until the 1<sup>st</sup> of December 2023. This decision is based on the recommendation of Bonsucro's Members Council and supported by the feedback received from Bonsucro's stakeholders, as well as from the outcome of an independent revision of the Standard Revision Process (the Retrospective).

This extension of the transition period will:

- facilitate the transition of Operators to the new standard (BPS v5.1) by giving them more time to prepare, and
- provide Bonsucro additional time to finalise the Interim Revision of BPS v5.1, to improve the clarity of requirements within the standard and its alignment with the Implementation Guide.

This decision means that Operators can choose to be audited against either BPS v4.2 or BPS v5.1 until 1<sup>st</sup> December 2023 (provided the audit starts on or before 1<sup>st</sup> December 2023). However, the preferred standard at Bonsucro is the BPS v5.1 which went through a credible multi-stakeholder revision process, including two public consultations. This upgraded version of the standard enables farmers and mills to meet current social and environmental challenges. For this reason, Bonsucro encourages Operators to implement, be audited and be certified against BPS v5.1 during the Transition Period. In addition, it is expected that Operators who choose to implement BPS v5.1 during the Transition Period will be better prepared to transition to the revised version of BPS expected in 2023, V5.2.

This Policy supports Operators and Certification Bodies in their transition from BPS v4.2 to BPS v5.1 and outlines the rules/criteria supporting the decision to extend the Transition Period until 1<sup>st</sup> December 2023. For its development, Bonsucro has consulted with its Certification Bodies and with the representatives of mills at the Bonsucro's Member Council.

The following table provides an overview of the validity of the different standards through the end of 2023. It highlights how the standards BPS 4.2 and BPS 5.1 will coexist during the Transition Period. The development process of V5.2 will take place in parallel, to be launched in June 2023, with a rollout in the second half of 2023. During the rollout period, operators will be trained to BPS v5.2 and start implementing it. BPS v5.2 will be binding from 2<sup>nd</sup> December 2023 onwards, i.e., any audits starting after 1<sup>st</sup> December 2023 will be to BPS v5.2. BPS v5.1 and v4.2 will no longer be applicable for audits starting after 1st December 2023.



\*BPS v5.1 and 4.2 will no longer be applicable for audits starting after 1st December 2023

\*BPS v5.1 and v4.2 will no longer be applicable for audits starting after 1st December 2023.

#### **Definitions**

No.	Term	Definition	
1	BPS Transition Period	The period of time allowed for moving to published versions of the BPS	
		standard. Specifically, this means from the effective date of	
		publication of the new standard BPS v5.1 (17 <sup>th</sup> January 2022) when	
		both BPS v4.2 and BPS v5.1 may be audited against until 1st December	
		2023. Effective 2 December 2023, the new revised BPS V5.2, will be	
		valid and all previous versions will be withdrawn/can no longer be	
		audited against.	
2	Adapted Transition	Bonsucro's approved alternative approaches to implementing an	
	Pathway	indicator or performing auditing/certification activities.	
		Annex I: Adapted Transition Pathway for BPS v5.1	
		Annex II: Adapted Transition Pathway for BPS v4.2	

# **Policy**

#### General

- 1. Projects and benchmarks conducted by Bonsucro during the *BPS Transition Period* shall use BPS 5.1 unless specified and justified by the project or benchmark and approved by the Secretariat.
- 2. Certification Bodies (CBs) shall support the Operators' choice and facilitate audits against BPS v5.1 or v4.2, depending on the request and in line with this Policy.
- 3. Bonsucro EU-RED certification is implemented according to Annex III.

#### **Audits**

- 4. During the BPS *Transition Period*, Operators may be audited against BPS v4.2 or BPS v5.1., i.e., Operators can decide against which version of the BPS they want to be audited and certified. The implementation of a standard always predates the first audit against that standard. Operators shall start implementing BPS v5.1 / BPS v5.2 prior to the audit against that standard version, paying particular attention to indicators referring to a cut-off date predating their audit date. E.g., BPS v5.1 indicator 4.1.4.
- 5. All BPS audits from the 2<sup>nd</sup> of December 2023 onwards shall be conducted against the updated version of the BPS, v5.2.
- 6. Once an Operator is audited against a version of the BPS, the subsequent audit shall be against the same or a newer version of the standard<sup>1</sup>.
- 7. From July 2022, the Certification Protocol V6 applies to all audits.
- 8. Pass Rate under Table 10 of Certification Protocol v6 also applies to audit against BPS v4.2<sup>2</sup>.
- 9. Operators audited against BPS v5.1 may implement a BPS v5.1 *Adapted Transition Pathway*, for the indicators listed in Annex I of this policy.
- 10. Operators audited against BPS v4.2 may implement a BPS v4.2 *Adapted Transition Pathway*, as described in Annex II of this policy.

<sup>&</sup>lt;sup>1</sup> Example: A mill audited in 2022 against BPS v5.1, can be audited in 2023 against BPS v5.1 or v5.2, but not against BPS v4.2.

<sup>&</sup>lt;sup>2</sup> The Bonsucro Calculator v4.1.6 (supporting auditing against BPS v4.2) has been updated to reflect this pass rate.

- 11. Operators concerned about any Bonsucro Standards indicators or Bonsucro certification requirements may liaise with their CB to consider whether an exception might be applicable. The CB will be responsible for evaluating the request, including the risks to the Bonsucro certification system, and discussing the possibility of a constructive adapted pathway, before deciding whether to send an exemption request to Bonsucro<sup>3</sup>. For more information, visit <a href="https://bonsucro.com/certification-tools/">https://bonsucro.com/certification-tools/</a> or access the Bonsucro Exemption Policy <a href="https://bonsucro.com/certification-tools/">here</a>.
- 12. When planning a surveillance audit against BPS v5.1 (Certification Protocol V6, Part 2, clause 15.2), CBs shall consider the transition to the new standard as an important risk factor when establishing the scope, duration and sampling elements of the audit plan.
- 13. When auditing an Operator against BPS v5.1, if any corrective actions agreed against BPS v4.2 are still pending for an indicator which has been modified or is no longer included in BPS v5.1, the CB shall evaluate if these actions are still relevant in the context of BPS v5.1, and how their timeline should be adapted to follow Certification Protocol v6. E.g., BPS v4.2 indicator 5.4.2 Energy used in cane transport per tonne cane transported, is no longer an indicator in BPS v5.1. However, cane transport energy is considered in the calculation under BPS v5.1 indicator 3.2.5 The Operator maximises the energy return on energy invested. In this case, the corrective action agreed under BPS v4.2 indicator 5.4.2 shall be evaluated and if necessary adapted to be progressed as part of BPS v5.1 indicator 3.2.5.
- 14. Certification cycles of Operators are not affected by the extension of the *BPS Transition Period*. Operators shall receive the type of audit that corresponds to them (initial, surveillance or recertification audits) according to their certification cycles, regardless of the version of BPS they are certified against.
- 15. The version of the BPS that Operators are certified against will be publicly available on the Bonsucro Website: https://bonsucro.com/certified-members-3/
- 16. BPS 4.2 training and qualifications for Licensed Training Providers (Trainers) and certification Bodies (Auditors, Lead Auditors and Technical Managers) will be granted according to Annex IV.
- 17. According to requirement 21.8 of Certification Protocol V6, relevant tabs of the calculator, either v4.1.6, v5.1.4 and subsequent versions, shall be completed in line with Table 12 and Annex 2 of Certification Protocol V6. The *Audit & Certificate Summary* tab was introduced to capture any information to be published on the Bonsucro website following the certification decision including information relating to Performance against 5 BPS indicators (compliance status & supporting narrative):
  - 1 indicator selected by the lead auditor / CB as an area of potential progress for the certificate holder.
  - 1 indicator selected by the certificate holder to reflect good performance in a specific area.
  - 3 strategic indicators selected by Bonsucro.

The three strategic indicators selected by Bonsucro to be published on the Bonsucro Website, in addition to the indicator selected by the lead auditor/CB (about potential progress) and the indicator selected by the operator (about good performance)<sup>4</sup> are:

<sup>&</sup>lt;sup>3</sup> Example: Corrective action plans shall be in place for non-conformities found during the audits according to section 19 of Bonsucro Certification Protocol V6, and its implementation shall follow the deadline specified in Table 9 of Bonsucro Certification Protocol V6. Should the corrective action plan to address a non-conformity require a longer timeframe than the one indicated in Table 9, requirement 19.5 of Bonsucro Certification Protocol V6 shall apply, where the CB shall carry out a risk analysis and decide whether to submit an exemption request to Bonsucro.

<sup>&</sup>lt;sup>4</sup> According to Certification Protocol V6/requirement 21.8, and The Audit & Certificate Summary tab in the Calculator.

Strategic indicators – BPS v4.2	Strategic indicators – BPS v5.1
BPSV4.2 indicator 2.2.2 Main health and safety	BPSV5.1 indicator 2.1.2 The Operator manages
risks are assessed and measures for mitigation	health safety hazards & risks through
of risk are implemented (CORE indicator)	implemented and enforced plans (CORE
	indicator)
BPSV4.2 indicator 4.1.3 The key environmental	BPSV5.1 indicator 3.2.1 The Operator ensures
issues are covered by an appropriate and	that a climate change mitigation and resilience
implemented environmental impact and	plan is in place and implemented (CORE
management plan (EIMP) (CORE indicator)	indicator)
BPSV4.2 indicator 2.1.2 Absence of forced or	BPSV5.1 indicator 4.3.2 The Operator develops
compulsory labour. (CORE indicator)	implements a water stewardship plan (CORE
	indicator)

# Annex I – BPS v5.1 Adapted Transition Pathway

#### Bonsucro recognises that:

- several factors (financial constraints, time required to carry out necessary survey and mapping
  exercises on vast supply bases, etc) may impact an operator's ability to implement some
  indicators introduced or amended by the BPS v5.1, and
- data required by the Bonsucro Calculator to demonstrate compliance against Bonsucro Production Standard v5.1, might not be yet available, partially due to the reporting period having started prior to the publication of BPS v5.1.

Bonsucro has identified a list of new or amended indicators on BPS v5.1 for which an Adapted Transition Pathway will be acceptable. This Annex establishes the list and applicable conditions.

As per point 4 on page 3, some of BPS v5.1 indicators include cut-off dates which pre date the launch of BPS v5.1 on 17<sup>th</sup> January 2022. This annex gives an adapted pathways for areas certified before the cut-off dates. However, any area added after 17<sup>th</sup> January 2022 must meet the cut-off dates stated in BPS v5.1.

#### **List of indicators**

Indicator	Indicator	Rationale	Adapted Transition Pathway
No.			When audited, the Operator shall demonstrate, as a minimum, that:
1.2.3	The Operator conducts and documents an improvement opportunity assessment outside the unit of certification.	This indicator is a <b>core indicator</b> introduced by BPS v5.1. It requires that Operators identify opportunities to address improvements in social and environmental issues, outside the unit of certification.  The Operator might require a longer timeline to roll out this indicator across the overall area outside the unit of certification.  Please note: this indicator does not request Operators to ensure compliance of non-certified areas with the BPS v5.1 but lists possible improvements under its scope and possibilities.	<ul> <li>Opportunities for improvement have been identified for part of the area outside the unit of certification and,</li> <li>A plan is in place to comply with the indicator for the rest of the area outside the unit of certification over the next 2 years (starting from the closing meeting of their first audit against BPS v5.1).</li> <li>On that basis, the CB shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.</li> </ul>
1.2.4	The Operator develops and implements a continuous improvement plan to address the salient opportunities identified outside the unit of certification.	This indicator is a <b>core indicator</b> introduced by BPS v5.1. It requests Operators to make a plan based on the assessment done under indicator 1.2.3, under the scope and possibilities of the Operator.  This indicator compliance is directly dependent on progress made against	<ul> <li>This indicator has been implemented for part of the area outside the unit of certification and,</li> <li>A plan is in place to comply with the indicator for the rest of the area outside the unit of certification over the next 2 years (starting from the</li> </ul>

Indicator	Indicator	Rationale	Adapted Transition Pathway
No.			When audited, the Operator shall
		indicator 1.2.3, therefore, a similar approach is relevant.	demonstrate, as a minimum, that:  closing meeting of their first audit against BPS v5.1).  On that basis, the CB shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
2.1.3	The Operator ensures that workers have access to safe water & adequate sanitation facilities.	This indicator is a <b>core indicator</b> which has been amended by BPS v5.1.  The Operator might require a longer timeline to comply with the amended sections of the indicator (compared with the timeline allowed in Bonsucro Certification Protocol v6).	A plan is in place to address their non-conformity by the next audit. On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
2.2.5	The Operator ensures that piece rate workers receive at least the legal minimum wage, including benefits.	This indicator is a <b>core indicator</b> which has been amended by BPS v5.1.  The Operator might require a longer timeline to comply with the amended sections of the indicator (compared with the timeline allowed in Bonsucro Certification Protocol v6).	When audited, the Operator shall demonstrate, as a minimum, that: a plan is in place to address their nonconformity by the next audit. On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
2.2.6	The Operator ensures that prevailing wages are benchmarked.	This indicator is a <b>non-core indicator</b> introduced by BPS v5.1.  Version 5.1.3 of the Calculator published in June 2022 and subsequent versions do not yet include a prevailing wages	Until the integration of a new tool has been confirmed, the certification body shall not raise non-compliances for this indicator.

Indicator	Indicator	Rationale	Adapted Transition Pathway
No.			When audited, the Operator shall demonstrate, as a minimum, that:
		tool aligned to the Living Wage methodology. In 2022-2023, the Bonsucro Living Wage Working Group will pilot a new tool for Operators to use. In due time, Operators will be invited to take part in the pilot as part of their audit cycle.	demonstrate, as a minimum, triat.
2.3.5	Where the Operator provides accommodation to workers, the Operator ensures that it meets minimum safety standards.	This indicator is a <b>core indicator</b> introduced by BPS v5.1.  The Operator might require a longer timeline to comply with the indicator (compared with the timeline allowed in Bonsucro Certification Protocol v6).	A plan is in place to address their non-conformity by the next audit. On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
3.1.4	The Operator conducts harvesting operations efficiently.	This indicator is a <b>non-core indicator</b> introduced by BPS v5.1.  Due to the Calculator reporting cycle, data reported in the Calculator before the first audit against BPS v5.1 might not be available if this data was not already collected by the Operator as part of the daily running of their operations.	For any Calculator reporting period ending before 17 <sup>th</sup> January 2023, should actual values not be available to complete the new data points in the Calculator, the certification body shall refer to the Certification Protocol V6 Part 2, paragraphs 19.7 and 19.8.
4.1.1	The Operator shall ensure that the key biodiversity and ecosystem services are mapped.	This indicator is a <b>non-core indicator</b> introduced by BPS v5.1. It is applicable to the whole supply area.	<ul> <li>The key biodiversity and ecosystem services are mapped for the unit of certification and,</li> <li>A plan is in place to map key biodiversity and ecosystem services for the rest of supply area by the next audit.</li> <li>On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.</li> </ul>

Indicator	Indicator	Rationale	Adapted Transition Pathway
No.			When audited, the Operator shall demonstrate, as a minimum, that:
4.1.2	The Operator develops and implements a Biodiversity Management Plan (BMP).	This indicator is a <b>core indicator</b> introduced by BPS v5.1.  The Operator might require a longer timeline to comply with the indicator (compared with the timeline allowed in Bonsucro Certification Protocol v6).	A plan is in place to address their non-conformity by the next audit. On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
4.1.4	The Operator ensures that no other areas of natural ecosystems have been converted to agriculture on or after 1st January 2021.	This indicator is a <b>core indicator</b> introduced by BPS v5.1.  Areas certified to BPS v4.2 before 17 <sup>th</sup> January 2022 (date of publication of BPS v5.1) might no longer comply under indicator 4.1.4 of the BPS v5.1.	<ul> <li>Present to the auditor a list of areas certified to BPS v4.2 before 17<sup>th</sup> January 2022 (date of publication of BPS v5.1) that no longer comply under indicator 4.1.4 of the BPS v5.1.</li> <li>The auditor shall verify that the areas certified were certified to BPS v4.2 before 17<sup>th</sup> January 2022.</li> <li>The auditor shall document an exact list of these areas in the audit report.</li> <li>Until Bonsucro publishes a decision on a Compensation &amp; Remediation Protocol, the Operator shall not be required to remove these areas from their scope of certification (unless other non-compliances raised during the audit justify such a decision).</li> <li>On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.</li> </ul>
4.1.6	The Operator conducts an ESIA when there is a significant change in operations or land expansion.	This indicator is a <b>core indicator</b> which has been amended by BPS v5.1. Due to the Calculator reporting cycle, data reported in the Calculator for the purpose of the Operator's first audit against BPS v5.1 might not be in line with the requirement.	For any Calculator reporting period ending before 17 <sup>th</sup> January 2023, should the metric not be met in the Calculator, the certification body shall consider compliance on the basis of a robust corrective action plan being in place to meet the metric indicator by the next audit (and next reporting timeline).

Indicator No.	Indicator	Rationale	Adapted Transition Pathway When audited, the Operator shall demonstrate, as a minimum, that:
			On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
4.2.4	The Operator applies as much fertilizer as recommended by soil analysis	This indicator rating is <b>upgraded to core</b> by BPS v5.1.  Due to the Calculator reporting cycle, analysis data reported in the Calculator for the purpose of the Operator's first audit against BPS v5.1 might not be in line with the requirement.	For any Calculator reporting period ending before 17 <sup>th</sup> January 2023, should the metric not be met in the Calculator, the certification body shall consider compliance on the basis of a robust corrective action plan being in place to meet the metric indicator by the next audit (and next reporting timeline). On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The "partially met" status, if granted by the certification body on the basis of this policy, will not prevent a positive certification decision.
4.4.4	The Operator only applies legal & safe agrochemicals.	This indicator is a <b>core indicator</b> which has been amended by BPS v5.1. Based on the Calculator reporting period, the banned agrochemicals added to the list by BPS v5.1 might still have been used during the reporting period.	For any Calculator reporting period ending before 17 <sup>th</sup> January 2023, should the metric not be met in the Calculator, the certification body shall consider compliance on the basis of a robust corrective action plan being in place to meet the metric indicator by the next audit (and next reporting timeline). On that basis, the certification body shall identify the indicator as "partially met" in the calculator "Output Summary" tab column I and inform the operator that the "partially met" compliance rating for this indicator will be published on the Bonsucro website. The calculator will still identify the status against the indicator as "not compliant". The

Indicator	Indicator	Rationale	Adapted Transition Pathway
No.			When audited, the Operator shall
			demonstrate, as a minimum, that:
			"partially met" status, if granted by the
			certification body on the basis of this
			policy, will not prevent a positive
			certification decision.
4.5.1	The Operator safely	This indicator is a core indicator	A plan is in place to address their non-
	manages storage facilities	introduced by BPS v5.1.	conformity by the next audit.
	and disposes safely of	The Operator might require a longer	On that basis, the certification body shall
	chemicals, fuels,	timeline to comply with the indicator	identify the indicator as "partially met"
	lubricants & other	(compared with the timeline allowed in	in the calculator "Output Summary" tab
	hazardous materials.	Bonsucro Certification Protocol v6).	column I and inform the operator that
			the "partially met" compliance rating for
			this indicator will be published on the
			Bonsucro website. The calculator will
			still identify the status against the
			indicator as "not compliant". The
			"partially met" status, if granted by the
			certification body on the basis of this
			policy, will not prevent a positive
			certification decision.

# Annex II – BPS v4.2 Adapted Transition Pathway

Bonsucro recognises that the extension of the use of BPS v4.2 until the 1<sup>st</sup> of December 2023 will require a few adaptations to its systems and procedures to support audits against BPS v4.2 during the BPS Transition Period. Bonsucro has identified specific elements for which a BPS v4.2 Adapted Transition Pathway will be acceptable. This Annex establishes the list and applicable conditions.

### **List of Indicators**

Indicator	Indicator	Rationale	Adapted Transition Pathway
No. 1.1.1	National Laws complied with	Bonsucro acknowledges that indicator 1.1.1 of BPS v4.2 must be given an adapted pathway without the need for an exemption to be requested when:  • The CB has not raised a systemic nonconformity (previously referred to as Major) against indicator 1.1.1, and  • The Operator has put in place everything that was under their control, including a robust plan to manage compliance with the law, but the Operator's full compliance with the indicator is prevented by external reasons, that are not under the Operator's control (such as authorities delays in issuing permits and licences),	The CB shall:  • Capture the relevant action plan in the audit report, considering whether the action plan would benefit from a longer timeframe than the one indicated in Table 9 of the Certification Protocol (for incidental non-conformities), without applying for an exception or exemption (the decision should be recorded in detail in the audit report) and  • Grade the indicator as compliant in the Calculator

#### Annex III - Bonsucro FU RFD Standard V1 and V2

When Operators include EU RED in their scope of certification, the Bonsucro EU-RED Standard must be used in conjunction with the BPS.

#### Bonsucro EU RED Standard V1 (approved and published in July 2021)

- This standard was developed based on BPS v4.2.
- This standard can be used in conjunction with BPS v5.1 and the Calculator applicable to this version of the BPS.
- This standard can be used in with BPS v4.2, provided:

When using the Calculator applicable to this version of the BPS:

The Bonsucro Calculator v4.1.6 has not been updated to reflect the new default GHG value established by EU-RED II. Therefore, if you wish to use the Bonsucro Calculator v4.1.6 to report your GHG emission savings, you must add 4.6 gCO2/MJ to the final result, i.e.:

- Take the result display on the tab "BONSUCRO EU Result" cell C15
- Add 4.6
- Note the total this is the default value plus any land use change emissions
- calculate: [94 (new fossil fuel emission value) total]/94 this is the total saving in %

For example, if there is NO land use change:

"BONSUCRO EU Result" cell C15 = 24

24+4.6 = 28.6

(94-28.6)/94 = 0.695 - 69.5% saving

The Bonsucro Calculator v4.1.6 shall be used to know the GHG emissions from the EU-RED certified ethanol only if the Operator chooses to use the default value, with or without land use change emissions. If Operators are using actual GHG value, it is necessary to use a separate tool to calculate it. Bonsucro Calculator v4.1.6 has not been updated to calculate GHG emission savings when actual values are being used.

#### Bonsucro EU RED Standard V2<sup>5</sup>:

- This standard was developed based on BPS v5.1.
- This standard can be used in conjunction with BPS v5.1 and the Calculator applicable to this version of the BPS.
- Once the Bonsucro EU RED Standard V2 has been approved, Bonsucro will liaise with the European Commission to clarify under which conditions Operators might be allowed to use Bonsucro EU RED Standard V2 in conjunction with BPS v4.2 and applicable Calculator till 1<sup>st</sup> December 2023.

<sup>&</sup>lt;sup>5</sup> Bonsucro submitted to European Commission in August 2022 a new version of Bonsucro EU-RED Standard V2 and is currently waiting for approval. This version includes additional requirements laid down in the Commission Implementing Regulation and was developed based on the BPS v5.1.

# Annex IV – Certification Bodies and Licensed Training Providers – BPS v4.2 training and qualifications

To ensure the credibility of the certification process and training services, while supporting Operators during the BPS Transition Period, training and qualifications will be granted as follow:

#### Licensed Certification Bodies:

- 1. **Lead Auditors / Technical Managers** who hold a valid qualification to BPS v5.1 and held a BPS V4.2 qualification in the past, will see their qualification to BPS v4.2 automatically extended till end of 2023.
- 2. **Auditors (non-lead)** performing audits to BPS v4.2 as part of an audit team can still be trained to BPS v4.2 and supervised by the CB as per current rules.
- 3. **Lead Auditors** who hold a valid qualification to BPS v5.1 but never held a BPS V4.2 qualification:
  - a. If the person has previous experience auditing BPS v4.2 as a non-lead auditor, he/she can still perform audits against BPS v4.2 as a Lead Auditor under a supervision of a qualified Lead Auditor on BPS V4.2
  - b. If the person does not have previous experience auditing BPS v4.2 the following is required:
    - i. Lead Auditor must receive BPS v4.2 training by a Lead Auditor / Technical Manager who held a BPS V4.2 qualification in the past, and
    - ii. Lead Auditor must receive extra support and supervision of their performance during and after the audit by a Lead Auditor / Technical Manager who holds a BPS V4.2 qualification.
    - iii. Lead Auditor should, when possible, include in the audit team a non-lead auditor with experienced auditing to BPS v4.2.
- 4. **Technical Managers** who hold a valid qualification to BPS v5.1 but never held a BPS V4.2 qualification:
  - a. If the person has previous experience auditing BPS v4.2 as a non-lead auditor, he/she can still make a certification decision for an audit carried out to BPS v4.2, the following is required:
    - i. Technical Manager must receive additional BPS v4.2 training by a Lead Auditor / Technical Manager who held a BPS V4.2 qualification in the past, and
  - b. If the person does not have previous experience auditing BPS v4.2, this person is not allowed to make a certification decision for an audit carried out to BPS v4.2.

Support and supervision of auditors and Lead Auditors can be carried out remotely when appropriate.

# **Licensed Training Providers:**

- 1. **Trainers** who hold a valid qualification to BPS v5.1 and held a BPS V4.2 qualification in the past, will see their qualification to BPS v4.2 automatically extended till end of 2023.
- 2. **Trainers** who hold a valid qualification to BPS v5.1 but never held a BPS V4.2 qualification:
  - a. If the person has previous experience auditing BPS v4.2 as part of a certification body service, he/she can still perform training against BPS v4.2 under a supervision of a qualified trainer on BPS V4.2

- b. If the person does not have previous experience auditing BPS v4.2 as part of a certification body service, the following is required:
  - i. Trainer must receive BPS v4.2 training by a trainer who held a BPS V4.2 qualification in the past, and
  - ii. Trainer must receive extra support and supervision of their performance during and after the training by a trainer who holds a BPS V4.2 qualification.
  - iii. Training Provider should, when possible, include in the training team a trainer with experienced delivering training and / or audit to BPS v4.2.

Support and supervision of trainers can be carried out remotely when appropriate.