

# Bonsucro Exemption Procedure

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## 1. PURPOSE AND SCOPE

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- 1.1 This document defines Bonsucro procedure regarding exemptions against Bonsucro Standards, the Certification Protocol, related policies and guidelines.
- 1.2 The purpose of this procedure is to ensure the credibility of the Bonsucro certification system by providing clarity regarding roles and responsibilities around exemptions.
- 1.3 This procedure incorporates the rigour and impartiality principles included in ISEAL Assurance Code v2.0 Clause 5.1.5.
- 1.4 Although exemptions are a productive and necessary mechanism to enable CBs to carry out certification activities, they shall not become the norm and should only be used as a last resort.

## 2. DEFINITIONS

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- 2.1 Scheme owner (Bonsucro): The organisation that is responsible for the standards system and accountable for the performance of its assurance system. The scheme owner determines the objectives and scope of the standards system, as well as the rules for how the scheme will operate and the standards against which conformance will be assessed.
- 2.2 Exemption: An instance when a specified requirement in a standard, protocol or policy is excluded from conformity evaluation or is adapted for a particular circumstance.
- 2.3 Risk: The likelihood and the severity an event might have on defined objectives. It is measured in terms of a combination of the probability of an event to occur and the severity of its consequences if it occurs.

## 3. REFERENCES

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- 3.1 ISEAL Assurance Code v2.0 Clause 5.1.5.
- 3.2 Bonsucro Certification Protocol and EU RED Additional Requirements
- 3.3 Bonsucro Exemption Request Form

## 4. EXEMPTION PRINCIPLES

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- 4.1 Exemption requests shall always be submitted by licensed CBs to Bonsucro for decision. Bonsucro will not consider exemption requests from certificate holders or applicants or any other stakeholders.

- 4.2 Bonsucro shall assume its responsibility in this process but shall not interfere with the impartiality of certification decisions nor the responsibility of the certification bodies to request an exemption.
- 4.3 The CB shall identify the need for an exemption by carrying out and documenting a risk analysis before deciding whether or not to submit an exemption request.
- 4.4 Should an exemption be granted by Bonsucro to a CB for a specific certificate holder or applicant, the decision is only valid for that certificate holder or applicant if and only if certified by this specific CB.
- 4.5 All exemptions are time-bound and applicable for a particular period of time.
- 4.6 Should the certificate holder or applicant decide to transfer to another CB after the exemption has been granted, the new CB shall evaluate the existing exemption and decide whether or not to send a request to Bonsucro for the exemption to be transferred. If the CB decides to send a request to Bonsucro, it shall include an updated evaluation of risk, additional conditions and/or modified timelines as applicable.
- 4.7 Should the certificate holder or applicant decide to transfer to another CB before the exemption has been requested, the new CB shall decide whether to apply for the exemption.

## 5. EXEMPTION PROCESS

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### 5.1 Exemption request

After reviewing their client's situation and conformity assessment, after taking into consideration the potential risks to the integrity of the Bonsucro certification system, and when compliance with a requirement of the certification system does not appear feasible or relevant or for any other duly justified reasons, the CBs shall decide whether or not to apply for an exemption.

When submitting their exemption requests, the CB shall include:

- i) Duly completed Bonsucro Exemption request form,
- ii) Supporting evidence if applicable (the evidence shall be referenced in the exemption request form), including risk analysis and proposed mitigation measures.

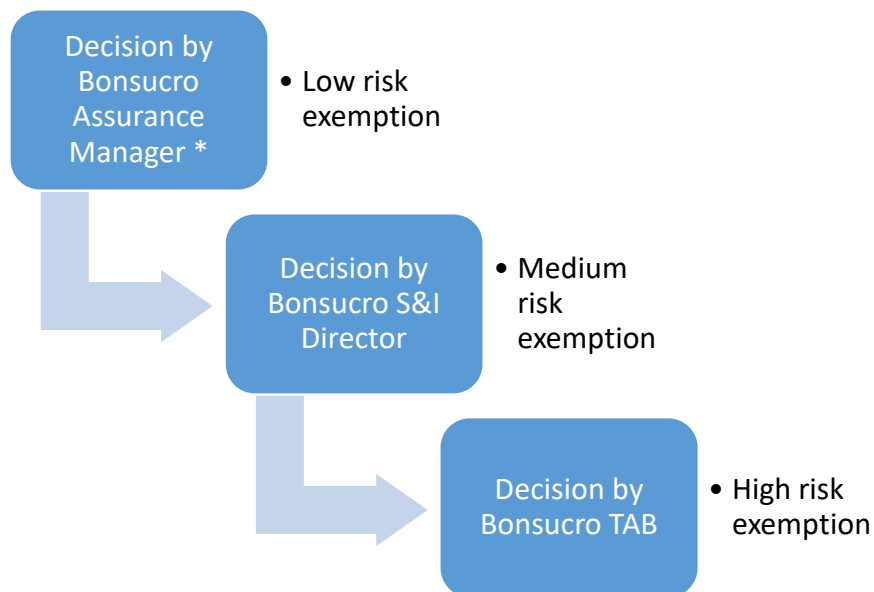
### 5.2 Review of request

- 5.2.1 Upon receipt of an exemption request, Bonsucro Assurance Manager (or other member of Bonsucro Secretariat) shall aim to review the request for completeness and accuracy and give an initial answer within 5 days.
- 5.2.2 The initial answer may be:
  - i) Notification that the exemption has been granted
  - ii) Request further information and/or documentary evidence
  - iii) Notification that the exemption request has been escalated internally for either consultation or decision.

- iv) Notification that the exemption has been denied
- 5.2.3 Bonsucro shall document and justify its answer to the certification body.

### 5.3 Decision and escalation process

5.3.1 The decision and the person responsible for it is defined by the following escalation process:



\*Or other appointed member of Bonsucro Secretariat

Low risk	exemptions against a Certification Protocol requirement against which a similar exemption has already been granted in the past.
Medium risk	exemptions against a Certification Protocol requirement against which no exemption has been granted so far,  repeated exemption request by the same CB indicating a possible systemic failure to apply a Certification Protocol requirement,  exemptions against the Claims and Labelling rules.
High risk	exemptions against a Production Standard Core indicator, a significant adaptation of a ChoC indicator,  exemptions relating to a certificate holder suspension.

- 5.3.2 All decisions on exemptions should be made in line with the following criteria:
- i) The risk to credibility of the Bonsucro certification system would be adequately managed. The decision maker can request additional conditions to be applied to the certificate holder and/or CB in order to adequately mitigate the risk to the credibility of the Bonsucro certification system.
  - ii) The exemption would not significantly alter a level playing field amongst certificate holders and/or CBs.
  - iii) The CB has clearly demonstrated that the exemption is used as a last resort.
- 5.3.3 The decision shall be documented on the Exemption Request form and communicated to the CB.
- 5.3.4 The decision shall be communicated publicly (respecting confidentiality of the name of involved CB and certificate holder).

## **5.4 Appeal**

- 5.4.1 If an exemption decision was made by the Bonsucro Assurance Manager, it can be appealed. The appeal shall be reviewed by Bonsucro S&I Director.
- 5.4.2 If an exemption decision was made by the Bonsucro S&I Director, it can be appealed. The appeal shall be reviewed by Bonsucro Technical Advisory Board.
- 5.4.3 If an exemption decision was made by Bonsucro Technical Advisory Board it cannot be appealed.