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Auditor Checklist for RSB Certification of Bonsucro-certified Operators

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Introduction

On January 24, 2014, the Roundtable on Sustainable Biomaterials (RSB) announced its decision to recognize the standard of Bonsucro, which certifies responsibly managed sugarcane.

This recognition builds upon a benchmarking process conducted by RSB to compare the respective sustainability requirements of the RSB Principles & Criteria (Version 2) and the Bonsucro Principles & Criteria (Version 3).

The comparison revealed that Bonsucro certified sugarcane could be *de facto* considered compliant with a majority of RSB requirements. The main exceptions include RSB Principle 5 (Rural and Social Development), RSB Principle 6 (Food Security) and Criterion 11b (Use of genetically modified organisms). The gap analysis is included in annex of this document.

This document describes the RSB Principles, Criteria and requirements to be included in the audit process of Bonsucro-certified operators willing to receive RSB certification. It is presented under the form of a checklist.

A. Intent

The intent of this checklist is to propose a simplified audit procedure for operators certified against Version 3.0 Bonsucro's Standard. This simplified audit procedure is based on a gap analysis conducted jointly by RSB and Bonsucro, and approved by the RSB Board of Directors as of January 2014.

B. Scope

This checklist should be used by *RSB recognized certification bodies*, their *auditors* and *audit team*. No aspect of this checklist shall be considered normative (i.e. compulsory) but its use is highly recommended.

C. Status and effective date

The version 1.0 of the *Auditor Checklist for RSB Certification of Bonsucro-certified Operators* shall be effective on March 5 2014.

D. Checklist for Auditors – RSB Principles & Criteria (RSB-STD-01-001 and RSB-STD-11-001-01-001)

D.1 Operators certified against Bonsucro Standard Version 3.0

RSB Ref.	Requirements for operators – to be verified by the auditor
Principle 1	None
Principle 2	
<ul style="list-style-type: none"> • Criterion 2.a 	<ul style="list-style-type: none"> - Full equivalence for greenfield projects. - Existing projects: Operators to undertake RSB screening and relevant Impact Assessments, as triggered
<ul style="list-style-type: none"> • Criterion 2.b 	<ul style="list-style-type: none"> - Full equivalence for greenfield projects. Operators to demonstrate that government representatives were involved in consultation with local stakeholders - Existing projects: Operators to undertake RSB Screening Exercise and relevant Impact Assessments. If an ESIA is triggered, the corresponding RSB requirement shall apply. - All: Management documents shall be publicly available, except where this is prevented by commercial confidentiality, of a proprietary nature or where disclosure of information would result in negative environmental or social outcomes.
<ul style="list-style-type: none"> • Criterion 2.c 	None
Principle 3	<ul style="list-style-type: none"> - Equivalence with 3a for producers targeting the EU market (for other market, either N/A or use whatever the local regulation requires). - Operators to run the RSB calculator for compliance with 3b and 3c.
Principle 4	
<ul style="list-style-type: none"> • Criterion 4.a 	None
<ul style="list-style-type: none"> • Criterion 4.b 	None
<ul style="list-style-type: none"> • Criterion 4.c 	None
<ul style="list-style-type: none"> • Criterion 	Operators to demonstrate that specific measures exist for the safety of women on work sites.

4.d	
• Criterion 4.e	Operators to demonstrate that the maximum number of regular hours worked per week does not exceed 48. Workers may work overtime which shall be voluntary, but total working hours shall not exceed 80 per week.
• Criterion 4.f	None
• Criterion 4.g	None
Principle 5	Operators to undertake RSB Screening Exercise and, if in region of poverty, conduct an SIA and demonstrate compliance with P5.
Principle 6	Operators to undertake RSB Screening Exercise and if in region of food insecurity, conduct an SIA and demonstrate compliance with P6.
Principle 7	
• Criterion 7.a	Operators to: <ul style="list-style-type: none"> - Conduct RSB Screening Exercise and, if necessary, Conservation Impact Assessment, except in country/area where an official HCV interpretation was conducted and maps of HCVA are available; - Demonstrate that no area considered as “no-go” under RSB was used in operations after January 1, 2008; - Demonstrate that no area considered as “no-conversion” under RSB was converted after January 1, 2008; - Demonstrate that they prioritized areas with the lowest possible risk of impacts to the identified conservation values; - Demonstrate that hunting, fishing, ensnaring, poisoning and exploitation of rare, threatened, endangered and legally protected species does not occur on the operation site.
• Criterion 7.b	None
• Criterion 7.c	Operators to demonstrate that: <ul style="list-style-type: none"> - Buffer zones are protected, restored or created to avoid negative impacts on areas that are contiguous to the operation site; - Within the operational site, buffer zones are protected, restored or created to avoid negative impacts from the biofuel operations on areas that contain conservation value(s) of local, regional or global importance.
• Criterion 7.d	None
• Criterion 7.e	None
Principle 8	Measures to improve the status of soil shall be included in the ESMP (See 2.a).
Principle 9	
• Criterion 9.a	Operators to: <ul style="list-style-type: none"> - Conduct the Screening and, if needed, a water impact assessment; - Demonstrate that the use of water for biofuel operations is not at the expense of the water needed by the communities that rely on the same water source(s) for subsistence; - Assess the potential impacts of biofuel operations on water availability within the local community and ecosystems during the screening exercise of the impact assessment process and mitigate any negative impacts; - Demonstrate that Water resources under legitimate dispute are not used for biofuel operations until any legitimate disputes have been

	settled through negotiated agreements with affected stakeholders following a free, prior and informed consent (as described in 2a and its guidance) enabling process.
<ul style="list-style-type: none"> • Criterion 9.b 	<p>Operators to:</p> <ul style="list-style-type: none"> - Demonstrate inclusion of water management in the ESMP (See 2.a); - Make the water management plan available to the public, unless limited by national law or international agreements on intellectual property; - Demonstrate that the water management plan is consistent with local rainfall conditions, does not contradict any local or regional water management plans, and include the neighboring areas, which receive direct runoff from the operational site. Any negative impact on these neighboring areas shall be mitigated; - Undertake annual monitoring of the effectiveness of the water management plan.
<ul style="list-style-type: none"> • Criterion 9.c 	<p>Operators to demonstrate that:</p> <ul style="list-style-type: none"> - they do not withdraw water from natural watercourses to the extent that it modifies its natural course or the physical, chemical and biological equilibrium it had before the beginning of operations; - critical aquifer recharge areas were identified in the impact assessment. Include water monitoring in the ESMP.
<ul style="list-style-type: none"> • Criterion 9.d 	<p>Operators to:</p> <ul style="list-style-type: none"> - Demonstrate that critical aquifer recharge areas were identified in the impact assessment and that no operations are undertaken on such areas; - Demonstrate that buffer zones are set between the operation site and surface or ground water resources; - Where the screening exercise has triggered the need for a Water Assessment (RSB-GUI-01-009-01), determine the optimal water quality level required to sustain the system, taking into account local economic, climatic, hydrologic and ecologic conditions.
Principle 10	
<ul style="list-style-type: none"> • Criterion 10.a 	<p>Plantations: N/A</p> <p>Mills: Operators to demonstrate that the EMP includes air pollution control</p>
<ul style="list-style-type: none"> • Criterion 10.b 	Operators to demonstrate that a phase-out plan for burning is in place, or else, justification of why burning is needed as per criterion 10b.
Principle 11	
<ul style="list-style-type: none"> • Criterion 11.a 	<p>Operators to demonstrate that:</p> <ul style="list-style-type: none"> - When complying with and auditing against this criterion, proprietary technology is protected from competitors and intellectual property rights are respected; - The impact assessment, health and safety requirements and EMP cover all hazardous technologies.
<ul style="list-style-type: none"> • Criterion 11.b 	Compliance required
<ul style="list-style-type: none"> • Criterion 11.c 	<p>Plantations: N/A</p> <p>Mills - Operators to:</p> <ul style="list-style-type: none"> - Demonstrate that genetically modified micro-organisms or any micro-organisms that pose a risk (pathogenic, mutagenic, contaminant, etc.) to

	<p>human health or the environment is not released outside the processing/production unit. Any such organism used for processing shall be destroyed or adequately neutralised (i.e. loss of any potentially hazardous character) before being disposed of;</p> <ul style="list-style-type: none"> - Include as part of their ESMP a plan that includes adequate monitoring and an emergency procedure in case of accidental dissemination of any such micro-organisms into the environment.
<ul style="list-style-type: none"> • Criterion 11.d 	<p>Operators to:</p> <ul style="list-style-type: none"> - Develop and implement a phase-out plan for chemicals listed under the Rotterdam and Stockholm Conventions; - Demonstrate that the use of ground or aerial pesticides complies with the FAO's Guidelines on Good Practices for Ground and Aerial Applications of Pesticides.
<ul style="list-style-type: none"> • Criterion 11.e 	<p>Operators to demonstrate that the ESMP includes a plan for managing residues, wastes and by-products providing similar results.</p>
Principle 12	
<ul style="list-style-type: none"> • Criterion 12.a 	<p>Operators to demonstrate that all legitimate disputes were settled prior to certification.</p>
<ul style="list-style-type: none"> • Criterion 12.b 	<p>All operators (greenfield and existing projects) to demonstrate that:</p> <ul style="list-style-type: none"> - There was no involuntary settlements of local communities; - ILO conventions 169 and 177 were used to obtain a free prior and informed consent; - Land deals were established in a fair and equitable way - Compensation for voluntary relinquishment and/or acquisition includes appropriate balancing measures needed to preserve the ability of the persons concerned to sustain their livelihoods in an autonomous and dignified manner; - Independent, qualified land valuation specialists were used for valuing all land and asset values; - Coercion to alter existing land rights or land use rights were not used in biofuel operations; - Where the rule of law is not adequately applied, international and regional legal bodies are consulted for rulings and information on disputes. <p>Existing projects – Operators to demonstrate that land is sold on a willing-seller/willing-buyer basis</p>

E. Checklist for Auditors – other RSB Standards

RSB Reference	Requirements for operators – to be verified by the auditor
<i>Chain of Custody Standards</i> (RSB-STD-20 and RSB-STD-11-20 series)	Compliance required
<i>RSB Standard for Participating Operators</i> (RSB-STD-30-001 and RSB-STD-11-001-30-001)	Compliance required
<i>RSB Standard on Communication and Claims</i> (RSB-STD-50-001 and RSB-STD-11-001-50-001)	Compliance required
<i>RSB Standard for Risk Management</i> (RSB-STD-60-001 and RSB-STD-11-001-60-001)	Compliance required

ANNEX I - Summary Gap Analysis (Bonsucro P&Cs vs RSB P&Cs)

RSB Reference	Coverage in Bonsucro V3	Additional requirements for RSB Certification
Principle 1	Full	None
Criterion 2.a	Full (Greenfield) Partial (Existing)	Full equivalence for greenfield projects. Existing projects: Operators to undertake RSB screening and relevant Impact Assessments, as triggered.
Criterion 2.b	Full (Greenfield) Partial (Existing)	Full equivalence for greenfield projects. Operators to demonstrate that government representatives were involved in consultation with local stakeholders. Existing projects: Operators to undertake RSB screening and relevant Impact Assessments. If an ESIA is triggered, the corresponding RSB requirement shall apply. All: Management documents shall be publicly available, except where this is prevented by commercial confidentiality, of a proprietary nature or where disclosure of information would result in negative environmental or social outcomes.
Criterion 2.c	Full	None
Principle 3	Partial	Equivalence with 3a for producers targeting the EU market (for other market, either N/A or use whatever the local regulation requires). Operators to run the RSB calculator for compliance with 3b and 3c.
Criterion 4.a	Full	None
Criterion 4.b	Full	None
Criterion 4.c	Full	None
Criterion	Partial	Operators to demonstrate that specific measures exist for the

RSB Reference	Coverage in Bonsucro V3	Additional requirements for RSB Certification
4.d		safety of women on work sites.
Criterion 4.e	Partial	Operators to demonstrate that the maximum number of regular hours worked per week does not exceed 48. Workers may work overtime which shall be voluntary, but total working hours shall not exceed 80 per week.
Criterion 4.f	Full	None
Criterion 4.g	Full	None
Principle 5	No	Implement screening and, if in region of poverty, conduct an SIA and demonstrate compliance with P5.
Principle 6	No	Implement screening and, if in region of food insecurity, conduct an SIA and demonstrate compliance with P6.
Criterion 7.a	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Conduct Screening and, if necessary, Conservation Impact Assessment, except in country/area where an official HCV interpretation was conducted and maps of HCVA are available. - Demonstrate that no area considered as “no-go” under RSB was used in operations - Demonstrate that no area considered as “no-conversion” under RSB was converted after January 1, 2008 - Demonstrate that they prioritized areas with the lowest possible risk of impacts to the identified conservation values. <p>Operators to demonstrate that hunting, fishing, ensnaring, poisoning and exploitation of rare, threatened, endangered and legally protected species does not occur on the operation site.</p>
Criterion 7.b	Full	
Criterion 7.c	Partial	<p>Operators to demonstrate that:</p> <ul style="list-style-type: none"> - Buffer zones are protected, restored or created to avoid negative impacts on areas that are contiguous to the operation site <p>Within the operational site, buffer zones shall be protected, restored or created to avoid negative impacts from the biofuel operations on areas that contain conservation value(s) of local,</p>

RSB Reference	Coverage in Bonsucro V3	Additional requirements for RSB Certification
		regional or global importance.
Criterion 7.d	Full	None
Criterion 7.e	N/A	None
Principle 8		
	Full	Measures to improve the status of soil shall be included in the ESMP (See 2.a).
Criterion 9.a		
Criterion 9.a	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Conduct the Screening and, if needed, a water impact assessment - Demonstrate that the use of water for biofuel operations is not at the expense of the water needed by the communities that rely on the same water source(s) for subsistence. - Assess the potential impacts of biofuel operations on water availability within the local community and ecosystems during the screening exercise of the impact assessment process and mitigate any negative impacts. <p>Demonstrate that Water resources under legitimate dispute are not used for biofuel operations until any legitimate disputes have been settled through negotiated agreements with affected stakeholders following a free, prior and informed consent (as described in 2a and its guidance) enabling process.</p>
Criterion 9.b		
Criterion 9.b	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Demonstrate inclusion of water management in the ESMP (See 2.a) - Make the water management plan available to the public, unless limited by national law or international agreements on intellectual property - Demonstrate that the water management plan is consistent with local rainfall conditions, does not contradict any local or regional water management plans, and include the neighboring areas, which receive direct runoff from the operational site. Any negative impact on these neighboring areas shall be mitigated <p>Undertake annual monitoring of the effectiveness of the water management plan.</p>

RSB Reference	Coverage in Bonsucro V3	Additional requirements for RSB Certification
Criterion 9.c	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Demonstrate that they do not withdraw water from natural watercourses to the extent that it modifies its natural course or the physical, chemical and biological equilibrium it had before the beginning of operations <p>Demonstrate that critical aquifer recharge areas were identified in the impact assessment. Include water monitoring in the ESMP.</p>
Criterion 9.d	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Demonstrate that critical aquifer recharge areas were identified in the impact assessment and that no operations are undertaken on such areas - Buffer zones are set between the operation site and surface or ground water resources <p>Where the screening exercise has triggered the need for a Water Assessment (RSB-GUI-01-009-01), determine the optimal water quality level required to sustain the system, taking into account local economic, climatic, hydrologic and ecologic conditions.</p>
Criterion 10.a	Partial	<p>Plantations: N/A</p> <p>Mills: Operators to demonstrate that the EMP includes air pollution control</p>
Criterion 10.b	Partial	<p>Operators to demonstrate that a phase-out plan for burning is in place, or else, justification of why burning is needed as per criterion 10b.</p>
Criterion 11.a	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Demonstrate that, when complying with and auditing against this criterion, proprietary technology is protected from competitors and intellectual property rights are respected <p>Demonstrate that the impact assessment, health and safety requirements and EMP cover all hazardous technologies.</p>
Criterion 11.b	No	<p>Compliance required</p>
Criterion 11.c	Partial	<p>Plantations: N/A</p> <p>Mills - Operators to:</p>

RSB Reference	Coverage in Bonsucro V3	Additional requirements for RSB Certification
		<ul style="list-style-type: none"> - Demonstrate that genetically modified micro-organisms or any micro-organisms that pose a risk (pathogenic, mutagenic, contaminant, etc.) to human health or the environment is not released outside the processing/production unit. Any such organism used for processing shall be destroyed or adequately neutralised (i.e. loss of any potentially hazardous character) before being disposed of. <p>Include as part of their ESMP a plan that includes adequate monitoring and an emergency procedure in case of accidental dissemination of any such micro-organisms into the environment.</p>
Criterion 11.d	Partial	<p>Operators to:</p> <ul style="list-style-type: none"> - Develop and implement a phase-out plan for chemicals listed under the Rotterdam and Stockholm Conventions <p>Demonstrate that the use of ground or aerial pesticides complies with the FAO's Guidelines on Good Practices for Ground and Aerial Applications of Pesticides.</p>
Criterion 11.e	Partial	<p>Operators to demonstrate that the ESMP includes a plan for managing residues, wastes and by-products providing similar results.</p>
Criterion 12.a	Partial	<p>Operators to demonstrate that all legitimate disputes were settled prior to certification.</p>
Criterion 12.b	Partial	<p>All operators (greenfield and existing projects) to demonstrate that:</p> <ul style="list-style-type: none"> - There was no involuntary settlements of local communities - ILO conventions 169 and 177 were used to obtain a free prior and informed consent - Land deals were established in a fair and equitable way - Compensation for voluntary relinquishment and/or acquisition includes appropriate balancing measures needed to preserve the ability of the persons concerned to sustain their livelihoods in an autonomous and dignified manner - Independent, qualified land valuation specialists shall be used for valuing all land and asset values - Coercion to alter existing land rights or land use rights shall not be allowed in biofuel operations - Where the rule of law is not adequately applied, international and regional legal bodies are consulted for rulings and information on disputes. <p>Existing projects – Operators to demonstrate that:</p>

RSB Reference	Coverage in Bonsucro V3	Additional requirements for RSB Certification
		Land is sold on a willing-seller/willing-buyer basis