

# **A Civil Society Guide to Bonsucro**



**How to understand and get involved with Bonsucro  
(formerly the Better Sugarcane Initiative)**

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## Introduction

This is a guide to Bonsucro, an organisation that seeks to improve the sustainability of global sugarcane production. It has been written by Ethical Sugar, an independent development NGO working in the sugar and biofuel sector. The guide has not been formally endorsed by Bonsucro and nor is it one of its official documents, all of which are available on its website: <http://bonsucro.com>.

Instead, this is a guide for trade unions, NGOs and civil society associations wanting to know more about Bonsucro and how they might get involved. There are four ways in which this can happen and we encourage groups to take them up:

1. Become a member of Bonsucro and help shape its rules
2. Inform auditors about problems they should investigate
3. Challenge the membership application of a company
4. Raise a complaint with Bonsucro about one of its members

In our view, it is important that workers, family farmers, indigenous people and local communities are able to participate in Bonsucro's activities and benefit from them. By promoting this kind of engagement, we believe that Bonsucro can become more responsive to the needs of people affected by sugarcane production and thus better achieve its mission.

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## Understanding Bonsucro

### What is Bonsucro?

Bonsucro is a global, non-profit initiative dedicated to reducing the environmental and social impacts of sugarcane production.

It aims to achieve this, firstly, through a multi-stakeholder process that defines how sugarcane production can be made more sustainable (known as 'standard setting') and, secondly, by ensuring this standard is implemented by mills and farmers by using independent auditors to carry out checks (known as 'third-party certification'). It funds its work by charging fees for membership and for certification.

The Production Standard is very comprehensive, covering almost 50 individual checks, but among the most important are to: follow the law; avoid child labour and forced labour; pay the national minimum wage; reduce agrochemical use; and avoid planting in areas of critical biodiversity. This applies to both sugar and ethanol produced from cane.

Bonsucro has settled on these issues based on members' own research – such as the WWF's 2004 book *Environmental Impacts of Sugar Production* – and also the negative media stories which have damaged some companies' reputations.

### How did Bonsucro begin?

In 2005 at a meeting entitled 'Better Sugar, Better Business' thirty stakeholders in the global sugar cane industry identified some of the key social and environmental impacts of sugarcane production and discussed how best to address them in a collaborative manner. The representative stakeholders were from trade unions, producer groups, banks, branded goods companies, traders, intergovernmental organisations, non-governmental organisations (NGOs) and research institutes.

As the name of the meeting suggests, this was an initiative founded on the belief that investment in sustainability was not an unnecessary business cost but a way of securing the long-term supply of key commodities. In this way it sought to replicate the WWF's other voluntary initiatives in forestry and palm oil, which were considered successful in encouraging major producers, manufacturers and retailers to sign up to standard-setting and certification practices.

Like these other initiatives, Bonsucro also sought to focus on key regions of global production including Brazil, Australia and India, three of the biggest cane-growing countries in the world. Less attention was paid to sugar beet production, since it was felt that the biggest impact could be made by focusing on sugarcane. Neither were the business practices of downstream actors using sugar or the health problems linked to sugar consumption considered. This was very much about changing the way cane was farmed and milled.

Within two years, the organisation – then known as the Better Sugarcane Initiative – had its first members. These included large organisations such as Cargill, ED&F Man, Tate & Lyle and WWF, as well as smaller organisations and individuals such as Ethical Sugar and the Australian cane farmer Robert Quirk. More corporations like Bacardi, BP, Coca-Cola and Shell would join later, although trade unions, NGOs and civil society associations proved harder to attract.

A major Brazilian stakeholder was UNICA, which had been involved from the very beginning. Its President at the time, Marcos Jank, was seeking to establish Brazilian sugar and especially ethanol as a 'green' global commodity. Participating in standard-setting initiatives like Bonsucro was seen as one way to do this, whilst also making sure that tough sustainability demands of consumers in Europe and the US were not unduly forced upon producers in Brazil.

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Back in Bonsucro, technical working groups began to identify the criteria and indicators of what would become its production standard for sustainable sugarcane. It was considered important for the standard to be based on quantifiable targets (e.g. a minimum age of 18 years old for hazardous work) so that auditors could clearly demonstrate whether the standard was being attained or not, and so that all members could agree on what they were aiming toward. Again, this was done with the outside world in mind, as it was felt that this approach would also lend public credibility to the standard.

By 2008, the founding members, at their first Annual General Meeting in São Paulo, invited the wider sugar industry and public to comment on 'version one' of the Production Standard. Outreach meetings and pilot audits of the standard were later done in ten different countries to try and make sure that the standard could be applied wherever in the world it was adopted.

In 2011, auditors were trained so that they could certify sugar mills against the Production Standard. In addition, 'chain of custody' systems were created so that the certified sugar/ethanol could be traced right through the supply-chain. These auditors tend to have a background in agricultural supply-chains and will typically have experience in things like certifying organic products, measuring carbon footprints and checking food safety standards.

Bonsucro certification began in June 2011 and the first shipment of Bonsucro certified ethanol from Brazil arrived in November 2012 at the port of Rotterdam. As of June 2013, over 42 million tonnes of sugarcane production was being produced under the Bonsucro standard, mainly in Brazil. This amounted to 2.88% of the total area used to grow sugarcane. Bonsucro has an aim to increase this to 20% by 2017.

## Why do mills get certified?

There is no legal requirement for sugar mills to be certified by Bonsucro. However, the European Union has a list of approved certification schemes – of which Bonsucro is one – and insists that any biofuel sold in the EU has been certified by one of these. This is to make sure that biofuels are produced in such a way that reduces greenhouse gas emissions relative to fossil fuels, and which protects land that is considered to be important to the environment. This law applies only to imports of biofuel, not to sugar.

There is also no explicit financial incentive to become certified. Bonsucro does not require that a premium be paid for certified sugar/ethanol by downstream buyers to the mill, nor a premium paid by the mill to farmers. However, mills may also choose to be certified by Bonsucro to demonstrate that they are a responsible company, to satisfy demands from their downstream buyers, and to become more sustainable.

Some milling companies have made public commitments to Bonsucro. According to news reports, Raízen has pledged to certify all of its 24 mills by 2018<sup>1</sup> and in its most recent Management and Sustainability Report Copersucar pledged to certify another 1 million tonnes of sugarcane by 2014.<sup>2</sup>

### *How much Brazilian ethanol is exported to the EU?*

Since 2008 the volume of Brazilian ethanol exported to the EU has been falling, displaced by US ethanol which has been subject to a different tariff rate. However, the export of Brazilian ETBE has gone up (ETBE is produced from ethanol and a fossil fuel called isobutylene). The main European importer of Brazilian ethanol in 2012 was Holland at 55 million litres. If the current tariff classification is challenged and/or import barriers liberalised, then Brazilian ethanol exports to the EU will be likely to bounce back again.

<sup>1</sup> Buffara Bueno & Bacaltchuc Advogados (2013) '**Raízen certifies three more plants with seal Bonsucro**', **News**, 2 April 2013. [http://www.bbalaw.com.br/news\\_details.asp?noticia=60](http://www.bbalaw.com.br/news_details.asp?noticia=60)

<sup>2</sup> Copersucar (2012) *Management and Sustainability Report: Crop Years 2010/2011 and 2011/12*. Available at: [http://www.copersucar.com.br/img/copersucar\\_sustainability\\_report\\_20102011e20112012.pdf](http://www.copersucar.com.br/img/copersucar_sustainability_report_20102011e20112012.pdf)



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## Which mills are certified?

As of June 2013 there were 30 mills worldwide that have been Bonsucro certified; the vast majority in Brazil. This list is constantly changing, so for the most recent data, please consult the Bonsucro website: <http://bonsucro.com/site/certification-process/certified-members/>

### Certified mills in Brazil, June 2013

Date of certification	Mill	Company	State
26/04/2013	Usina São Luiz S/A	Copersucar	SP
13/03/2013	Unidade Univalem	Raizen Energia S/A	SP
31/01/2013	Usina Monte Alegre	Adecoagro	MG
08/01/2013	Usina Rio Claro	ETH Bioenergia	GO
19/12/2012	Unidade Gasa	Raizen Energia S/A	SP
10/12/2012	Tropical	Tropical BioEnergia SA	GO
15/11/2012	Unidade Bonfim	Raizen Energia S/A	SP
04/10/2012	São Martinho SA	São Martinho SA	SP
09/08/2012	Unidade Sta Elisa	LDC SEV Bioenergia S/A	SP
01/08/2012	Fazenda Sant'Ana	Usina Alta Mogiana S/A	SP
30/07/2012	Guariroba Mill	Bunge	SP
14/06/2012	Usina Angélica	Adecoagro Vale do Ivinhema	MS
06/06/2012	Destilaria Alcidia S/A	ETH Bioenergia	SP
14/05/2012	Usina Itapagipe	Usina Itapagipe Açúcar e Alcool Ltd	MG
12/03/2012	Unidade Jatai	Raizen Energia S/A	GO
12/03/2012	Sao Joao	USJ Açucar e Alcool S.A.	SP
12/12/2011	Costa Pinto Mill	Raizen Energia S/A	SP
12/12/2011	Bom Retiro Mill	Raizen Energia S/A	SP
08/12/2011	Conquista do Pontal Mill	ETH Bioenergia	SP
06/12/2011	Frutal Mill	Bunge	MG
06/12/2011	Moema Mill	Bunge	SP
25/10/2011	Sao Jose Mill	Zilor	SP
25/10/2011	Barra Grande Mill	Zilor	SP
25/10/2011	Santa Adelia Mill	Copersucar	SP
25/10/2011	São Manoel Mill	Copersucar	SP
25/10/2011	Quata Mill	Zilor	SP
26/09/2011	Equipav Mill	Renuka do Brasil S.A.	SP
14/07/2011	Maracaí Mill	Raizen Energia S/A	SP

## Who runs Bonsucro?

Bonsucro is a member-based organisation governed by a Board of Directors. The directors are elected from the membership and reflect its different categories. Manufactures, traders, millers, farmers and civil society groups are all represented – although not necessarily in equal number. At the time of writing, the Chairman is from BP and the Vice-Chairman is from Bunge. The full and most up-to-date list of directors is available here: [http://bonsucro.com/site/about/board\\_of\\_directors/](http://bonsucro.com/site/about/board_of_directors/)

Decisions are generally taken by a majority vote, with the chairman having the casting vote if voting is tied. Each year, one third of the directors (those that have served the longest) must retire from the Board or apply for re-election with the other candidates.

The directors are elected by the members of Bonsucro. Any organisation with an interest in sugarcane production can apply to become a member of Bonsucro. Members must pay fees and agree to abide by the Code of Conduct. This requires them to support the implementation of the Bonsucro standard and promote increased purchasing of certified sugar and ethanol. As yet, it does not *require* mills or farms that become members to actually become certified within a specific timeframe.

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As well as voting for directors, members of Bonsucro can help to revise the standard against which producers are certified through participation in working groups. They can also attend Annual General Meetings, vote on decisions put to them, and, if needs be, exercise control over the directors by voting for a special resolution. Members are notified of events via the Bonsucro Bulletin, which is also available on the organisation's website:

<http://bonsucro.com/site/news/>

## Bonsucro members, June 2013

Members in Brazil	Members in Rest of the World
Adecoagro, AGROVALE, Braskem, CEVASA, Copersucar, ETH Bioenergia, Grupo Bunge, Grupo Farias, Grupo São Martinho, Grupo USJ, Guarani, IPAM, Oderbrecht Agroindustrial, Petrobras, Raizen, Renuka, Rio Vermelho, Sao Fernando, UNICA, Usina Alta Mogiana, Usina Alto Alegre, Usina Azucarera Sao Manoel, Usina Santa Adélia, Usina São Luiz, Zilor Energia e Alimentos	Abengoa, ACFA, Addax Bioenergy Management, Argos Oil, Armajaro, Asocaña, Azunosa, Bacardi, Bayer Crop Science, BP, Cargill, Case IH, Cevital, Coca-Cola, Concern Universal, CSC Sugar LLC, CSM, Ecover, ED & F Man, EID Parry, Ferrero, Greenergy, IFC, Kraft, La Isla Foundation, Mag Alcoholes, Neltec, New South Wales Sugar Milling Coop, NSL Sugars, Pepsico, Procaña, Rabobank, Ragus Sugar Ltd, Reef Catchments, Robert Quirk, Schulz Estate, Shell, Sojitz Corporation, Solidaridad, Sucre-Ethique, Suiker Unie, Syngenta, Tambunkulu Estates, Tate & Lyle, Toyota Tsusho Corp, Unilever, Union de Cañeros Guabira, United Molasses, West Indies Trading, WWF

Finally, a permanent Secretariat is responsible for managing the day-to-day affairs of Bonsucro, executing the decisions of the Board of Directors and working to achieve the strategic goals of the organisation. The Secretariat is based in the UK, although one employee is stationed in Brazil.

### What is the Bonsucro standard?

The Bonsucro standard is based on five principles. These are: (1) obey the law; (2) respect human rights and labour standards; (3) manage input, production and processing efficiencies to enhance sustainability; (4) actively manage biodiversity and ecosystem services; and (5) continuously improve key areas of the business.

Each principle has to be operationalized. That means that it needs criteria and indicators against which the auditor can gather information and make an objective decision as to whether the mill and its cane supply area should be 'Bonsucro certified'.

There are twenty criteria in total and five of these are core criteria. To pass the standard, all indicators of the five core criteria must be met and 80% of the indicators in total.

Below are some of the most important criteria in terms of the social impacts of sugarcane production. The relevant core criteria (1.1, 2.1, 2.4 and 5.7) are shaded in grey and must be met during the audit.

If they are not met in the factory, then the mill should not be certified. If they are not met in the field, then a representative volume of sugarcane is deducted from what the mill can claim as certified (this is so as not to punish the entire mill and cane supply-area for potentially just one violation).

The full Bonsucro Production Standard can be downloaded for free at:

<http://bonsucro.com/site/production-standard/>.

### Principle 1: Obey the Law

Criteria	Indicator	Standard	Notes	
1.1	Comply with relevant applicable laws.	Relevant national laws and international conventions complied with.	Yes	
1.2	Demonstrate clear title to land in accordance with national practice and law.	The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.	Yes	Those rights can be related either to legal ownership or lease of the land or to customary rights.

### Principle 2: Respect Human Rights and Labour Standards

Criteria	Indicator	Standard	Notes	
2.1	Comply with ILO labour conventions governing child labour, forced labour, discrimination and freedom of association and the right to collective bargaining.	Minimum age of workers	18 for hazardous work 15 for non hazardous work	<i>This applies to labour contractors engaged in core activities central to the production of sugarcane, e.g. field preparation, farm management, cane cutters.</i>
		Absence of forced or compulsory labour	Yes	
		Absence of discrimination	Yes	
		Respect the right of all personnel to form and join trade unions and/or to bargain collectively in accordance with the law.	Yes	
2.2	Apply Bonsucro human rights and labour standards to suppliers and contractors.	Percentage of contractors and major suppliers who have demonstrated compliance with human rights and labour standards.	95%	<i>This applies to labour contractors and major suppliers engaged in non-core activities, e.g. fertiliser suppliers, electricians, equipment maintenance.</i>
2.3	To provide a safe and healthy working environment in work place operations.	Lost time accident frequency	Number per million hours worked Mill <15; Agric < 45	
		Assessment of the main health and safety risks and measures implemented for mitigation of risk	Yes	
		Appropriate personal protective equipment supplied to and used by all workers.	Yes	
		Training for health and safety.	90%	
		Availability of sufficient safe drinking water to each worker present on the field and/or mill.	Yes	
		Access to first aid and provision for emergency response.	Yes	
2.4	Provide employees and workers (including migrant, seasonal and other contract labour) with at least the national minimum wage.	Ratio of lowest entry level wage including benefits to minimum wage and benefits required by law.	≥1	
2.5	Provide clear, equitable and comprehensive contracts.	Existence of a contract or equivalent document.	100%	All workers to be provided with a contract or equivalent document (e.g. national working card), to be aware of their rights, and to be paid in a form and at a frequency convenient to them.

### Principle 5: Continuously Improve Key Areas of the Business

Criteria	Indicator	Standard	Notes	
5.7	For greenfield expansion or new sugarcane projects, to ensure transparent, consultative and participatory processes that address cumulative and induced effects via an environmental and social impact assessment (ESIA).	Compliance with a recognized ESIA	Yes	Cut-off date 1 January 2008. The ESIA shall cover all aspects related to baseline surveys and assessments, implementation, mitigation, monitoring and evaluation plans as required. Transparency and participatory consultation with all relevant stakeholders required.
		High Conservation Value areas (interpreted nationally as described in Appendix 1) used as a % of total land affected by a new project or an expansion	0%	Cut-off date 1 January 2008.

#### How are mills audited against the standard?

Only mills that are members of Bonsucro can be audited against the standard and qualify as 'Bonsucro certified'.

When it is ready to proceed with the audit, it must then specify how much of its cane it wishes to certify (this is known as the cane supply area). It is possible for a mill to certify less than 100% of its cane throughput. In this instance, the farms which fall outside the certification area are still included in the audit, but are treated as non-core suppliers and subject to the weaker criterion 2.2 rather than the stronger criterion 2.1.

Next, the mill contracts one of the certifying bodies approved by Bonsucro. These certifying bodies are companies separate from both Bonsucro and from the mill (i.e. they are 'third-parties') and thus intended to offer an independent assessment. They are given training on the Bonsucro system to ensure its correct interpretation and implementation, and are subject to oversight by Bonsucro. All of the audits conducted in Brazil in 2011-12 were undertaken by either Control Union or SGS.

Once the certifying body has been contracted, they may undertake a 'preliminary review'. This involves getting to know the mill's organisational structure and quality management system, and is intended to provide pertinent information ahead of the actual audit.

The audit itself is compulsory and involves interviews with key staff and workers. The certifying body must also visit the specified cane supply area to observe practices and conduct interviews in the field. Since it would be difficult to visit every single farm supplying a mill, this is done according to a sample.

#### *How do auditors sample farms?*

All the farms providing more than 25% of total sugarcane to the mill must be visited and verified as compliant, half of the farms providing between 10-25%, a quarter of the farms providing 5-10% and so on. If there are known risks in specific areas, certifying bodies are expected to use their discretion and audit these areas as a priority.



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As noted above, all the core criteria (1.1, 2.1, 2.4, 4.1 and 5.7) and more than 80% of the total indicators must be met during the audit. If they are not, and until it can be proved that these have been corrected, the mill should not be certified or have a certain volume of sugarcane deducted from what it can claim as certified. These are known as *major* non-conformities.

Not every indicator has to be achieved for a mill and its cane supply-area to be certified. If less than 20% of non-core indicators are not met, this constitutes a *minor* non-conformity. A corrective action plan is signed by the mill and scrutinised at the next audit.

Assuming that the mill does pass, a certificate will be awarded and certified products (or credits) can then be traded. Bonsucro offers a separate 'chain of custody' certification to other companies in the supply-chain to make sure the right amount of certified sugar/ethanol is claimed.

The mill must pay both the certifying body for the audit and Bonsucro a fee of US\$ 0.075 per tonne, per year.

The certification of the mill lasts three years. Every year, a 'surveillance audit' is carried out. This is intended to follow-up on any corrective action plan agreed during the initial audit to see if the necessary changes have been made, and to check aspects of the business that may have been overlooked first time around. If any major non-conformities are discovered during the surveillance audits, the mill/farm must respond within one month or the certificate may be suspended and another full audit deemed necessary.

## Getting involved

### How can my organisation influence Bonsucro?

#### 1. Become a member of Bonsucro and help shape its rules

Bonsucro has been criticised by some for having a membership skewed towards the private sector, and large corporations especially. The recent arrival of Concern Universal (working in Malawi), the [Instituto de Pesquisa Ambiental da Amazônia](#) (Brazil), La Isla Foundation (Nicaragua) and Save the Children (Mexico) has redressed this to an extent, but more could still be done.

Membership is open to trade unions, NGOs and other civil society organisations in the Southern hemisphere (i.e. Brazil) at an annual cost of GBP £200. This provides the opportunity to join committees, vote in resolutions, elect Directors, etc. The membership application form is available here: <http://bonsucro.com/site/application/>

Even without becoming a member, there is also the possibility of attending a Bonsucro Annual General Meeting and speaking to delegates there. The next AGM is being held in New Orleans, USA, on 4-8 November 2013. Bonsucro is also revising its standard and will be inviting public comments on its proposals in early 2014. In the meantime, or Ben Richardson, Ethical Sugar ([benjamin.j.richardson@gmail.com](mailto:benjamin.j.richardson@gmail.com)). Follow the revision of the Standard at: [www.bonsucro.com](http://www.bonsucro.com)

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## 2. Inform auditors about problems they should investigate

The certifying bodies can conduct a more thorough audit (and therefore put pressure on the company) if they know of any risks in advance. **Infringements must be seen by the auditor** to affect the certification process, so it is important they have full access to the facts and know where to look. This process can also be repeated after the initial audit and used to apply pressure via the surveillance audit.

Ethical Sugar are encouraging Bonsucro to formalise this dialogue with civil society by having the certifying bodies speak to relevant organisations prior to the audit. In the meantime, information on potential problems can be passed to certifying bodies via the Secretariat. To do this, please email the Secretariat directly or get in touch with Ethical Sugar using this email: benjamin.j.richardson@gmail.com.

## 3. Challenge the membership of a company

Another possible action is to prevent companies becoming members from Bonsucro in the first place. All requests for membership are posted on the Bonsucro website for 30 days and comments are invited. If there are any negative comments, the Board of Directors reviews the information and decides on the application. However, in practice it is unusual for a company to be denied membership, not least because the mission of Bonsucro is to support 'continuous improvement' – not to ignore companies that say they want to become more sustainable.

Trade unions, NGOs and civil society associations can help hold companies accountable once they become members. Many companies have signed up to Bonsucro but been slow in getting certified. They should be pushed to get certified as soon as possible. Otherwise, they continue to use the positive association of Bonsucro without being checked on whether they actually abide by Bonsucro's human rights and labour standards.

## 4. Raise a complaint with Bonsucro about one of its members

Bonsucro encourages parties to resolve any disputes directly with each other. If this proves infeasible, a complaints resolution process can be initiated. This exists to resolve issues in the following areas (and timeframes):

- Violation of the members' Code of Conduct (throughout the duration of membership)
- Wrongful awarding of a Bonsucro certificate or a member's non-compliance with the Bonsucro standard (throughout the period of certification)
- Incorrect auditing (within six months of the audit in question)
- Improper behaviour by Bonsucro Directors, committee members or staff (within six months of the action in question)

What will not be accepted as a valid complaint are issues relating to:

- × Allegations of a member's actions that occurred prior to that member joining Bonsucro
- × Allegations against non-members
- × Allegations unrelated to a member's sugarcane business
- × Allegations that occurred outside the available timeframe for filing complaints

The complaints process can be very time-consuming and there is no guarantee that it will result in changed business practices. Ultimately, unlike government, there is little Bonsucro can do to *force* its members to take a particular course of action. Nevertheless, if Bonsucro is informed about problems **especially the violation by a certified company of a core criterion** then it can suspend the certification and order a re-audit. This is likely to cost the company in both financial and public relations terms.

*How should a complaint be made?*

Complaints must be filed in writing and in English in order to be considered. All complaints must be submitted by email to [complaints@bonsucro.com](mailto:complaints@bonsucro.com) or via post to:

The Complaints Manager  
Bonsucro  
20 Pond Square  
London N6 6BA  
UK

The initial burden of proof is on the party who makes the complaint. They are required to provide all of the following information before a complaint is considered:

- i. Information on who they are and their contact details
- ii. Who the complaint is against, which issue is being addressed and the specific wrongdoing that has occurred
- iii. Documentation and other supporting evidence to directly substantiate the complaint
- iv. Description of previous steps that were undertaken to seek resolution directly, prior to turning to this procedure
- v. Recommendations on actions and activities to correct the problems raised

A Complaints Manager appointed by Bonsucro will decide if the complaint is valid and you will be notified either way. If it is a valid complaint, the Complaints Manager will then contact the organisation being complained against (known as the Respondent) and pass on the evidence. The Respondent has 30 days to reply to the allegations.

After this period, the Complaints Manager submits a report to the Chief Executive of Bonsucro with recommendations, who then proposes a decision to the Board of Directors. The Board will then either authorize this decision or advise that changes need to be made.

Both parties will be notified of the decision and can either accept the decision or submit a counter proposal.

If no agreement between parties can be reached, the Board of Directors will make the final decision: (a) uphold the original decision; (b) accept one of the counter proposals; (c) accept a combination decided by the Board.

The Respondent shall be advised of any corrective action which must be taken. Bonsucro will monitor progress towards achieving this. If it is not implemented, the Board of Directors can exclude the organisation from Bonsucro for a period of time.

However, there is still an opportunity for both parties involved to appeal this 'final' decision. The appeal will be heard by a panel comprising the Chair of the Directors of Bonsucro and three other Bonsucro member representatives. The chosen representatives should have no conflict of interest in the outcome. The panel then decides whether to uphold or revise the original decision.

## About Ethical Sugar

Ethical Sugar is a not-for-profit organization that builds networks of civil society actors to raise awareness of key issues in the global sugar industry. We disseminate studies and best practice strategies to make the production of sugar food and biofuel fairer. We have no permanent staff and rely on philanthropic donations and voluntary workers. We have been a member of Bonsucro since its beginning in 2005. More information is available here: [http://www.sucre-ethique.org/?lang=pt\\_br](http://www.sucre-ethique.org/?lang=pt_br)

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