

Public report
on the assessment of

certification scheme
Bonsucro

(request for advice from February 2020)

against the Dutch legal sustainability criteria
for solid biomass for energy applications

by the

Advisory Commission on Sustainability
of Biomass for Energy Applications

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Table of contents

1	Introduction	- 2 -
1.1	Dutch sustainability criteria for solid biomass for energy applications	- 2 -
1.2	The advisory commission sustainability biomass for energy applications.....	- 2 -
1.3	Readers guide.....	- 2 -
2	The commissions’ assessment procedure and assessment of the Bonsucro certification scheme..	- 3 -
2.1	Assessment protocol	- 3 -
2.2	Summary of the assessment procedure.....	- 3 -
2.3	Application by Bonsucro.....	- 4 -
2.4	Timeline of the Bonsucro assessment.....	- 4 -
2.5	External input	- 4 -
3	Summary of findings on the Bonsucro certification scheme	- 5 -
3.1	Findings on classification of biomass and on the first link in CoC to be certified	- 5 -
3.2	Findings for management criteria	- 5 -
3.3	Findings for individual sustainability criteria.....	- 5 -
4	Assessment tables for the Bonsucro certification scheme	- 7 -
4.1	Assessment of classification of biomass and on first link in CoC to be certified.....	- 7 -
4.2	Assessment table for management criteria	- 7 -
4.3	Assessment tables on sustainability criteria for the claim “Bonsucro EU-RED compliant” plus scope “Bagasse-NL”	- 10 -
5	Documents used for the assessment of the Bonsucro certification scheme.....	- 17 -
5.1	Documents submitted by the scheme manager as part of the request for approval.....	- 17 -
5.2	Scheme document submitted by the scheme manager during the ADBE’s assessment procedure	- 17 -
5.3	Additional documents assessed by the commission.....	- 17 -
	Annex I – Biomass categories and the CoC system	- 18 -
	Annex II – Abbreviations	- 19 -

1 Introduction

1.1 Dutch sustainability criteria for solid biomass for energy applications

In September 2013 more than 40 Dutch government bodies, companies and non-governmental organisations endorsed the National Energy Agreement for Sustainable Growth. Part of this Agreement deals with targets for the more sustainable use of energy in the years 2020 and 2023. Bio-energy plays an important role in meeting these targets. It was also agreed that sustainability criteria would be formulated for the large-scale application of biomass for cofiring in coal-fired power plants, and that these sustainability criteria would include forest management and climate aspects like greenhouse gas emissions, carbon debt and indirect land use change.

A working group with representatives from energy companies, environmental organisations and the government has further developed the sustainability criteria into principles and underlying criteria. As from 2015 these principles and criteria have been included as a condition in the subsidy regulation SDE+ for cofiring and for production of industrial steam from wood pellets, and from beginning 2018 these principles and criteria are laid down in environmental legislation. In order to demonstrate compliance with these principles and criteria, companies need to demonstrate that the biomass used fully meets the legal requirements. This can be achieved by use of certification schemes and/or by use of the verification protocol approved for this purpose by the Dutch minister of Economic Affairs and Climate Policy (minister of EZK).

1.2 The advisory commission sustainability biomass for energy applications

The independent advisory commission sustainability of biomass for energy applications (further in this document “commission” or “advisory commission” or “ADBE”) is installed by the Dutch government. The commission advises the minister of EZK on the extent to which certification schemes comply with the sustainability criteria in the Dutch legal *‘regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen’*. The commission only gives advice on request of the minister, who receives applications for approval of certification schemes and has to decide on the approval. The minister of EZK will approve certification schemes per individual sustainability criterion, and will only approve schemes which address all management criteria. The use of a certification scheme leads to one or several claims (for instance the claim “Bonsucro EU-RED compliant”). The ADBE will advise which Dutch sustainability criteria are covered by the claim of the scheme.

Energy companies can use the approved certification schemes and their claims to demonstrate that the solid biomass which they use complies with the Dutch legal sustainability criteria, either as “sustainable biomass” or as “controlled biomass”. Demonstrating compliance is a condition for receiving subsidy from the so-called [SDE+ subsidy scheme](#) for cofiring of solid biomass in coal-fired power stations or for the large-scale production of industrial steam from solid biomass. Certification schemes might not be approved for all sustainability criteria. In this case a combination of two or more certification schemes and/or a combination of certification and verification might be required to show compliance with all Dutch legal sustainability criteria.

1.3 Readers guide

In chapter 2 of this report the assessment procedure of the advisory commission plus the application by Bonsucro and the timeline of the assessment are briefly explained. Chapter 3 gives a summary of the findings from the assessment by the commission for the Bonsucro certification scheme. In chapter 4, details on the commission’s judgement are given, and chapter 5 lists the documents that were used when performing this assessment. This report comes with two annexes: the first annex gives background information on the requirements for biomass categories and the Chain-of-Custody (CoC) system from Dutch legislation, and the second annex lists the abbreviations that are used throughout this report.

2 The commissions' assessment procedure and assessment of the Bonsucro certification scheme

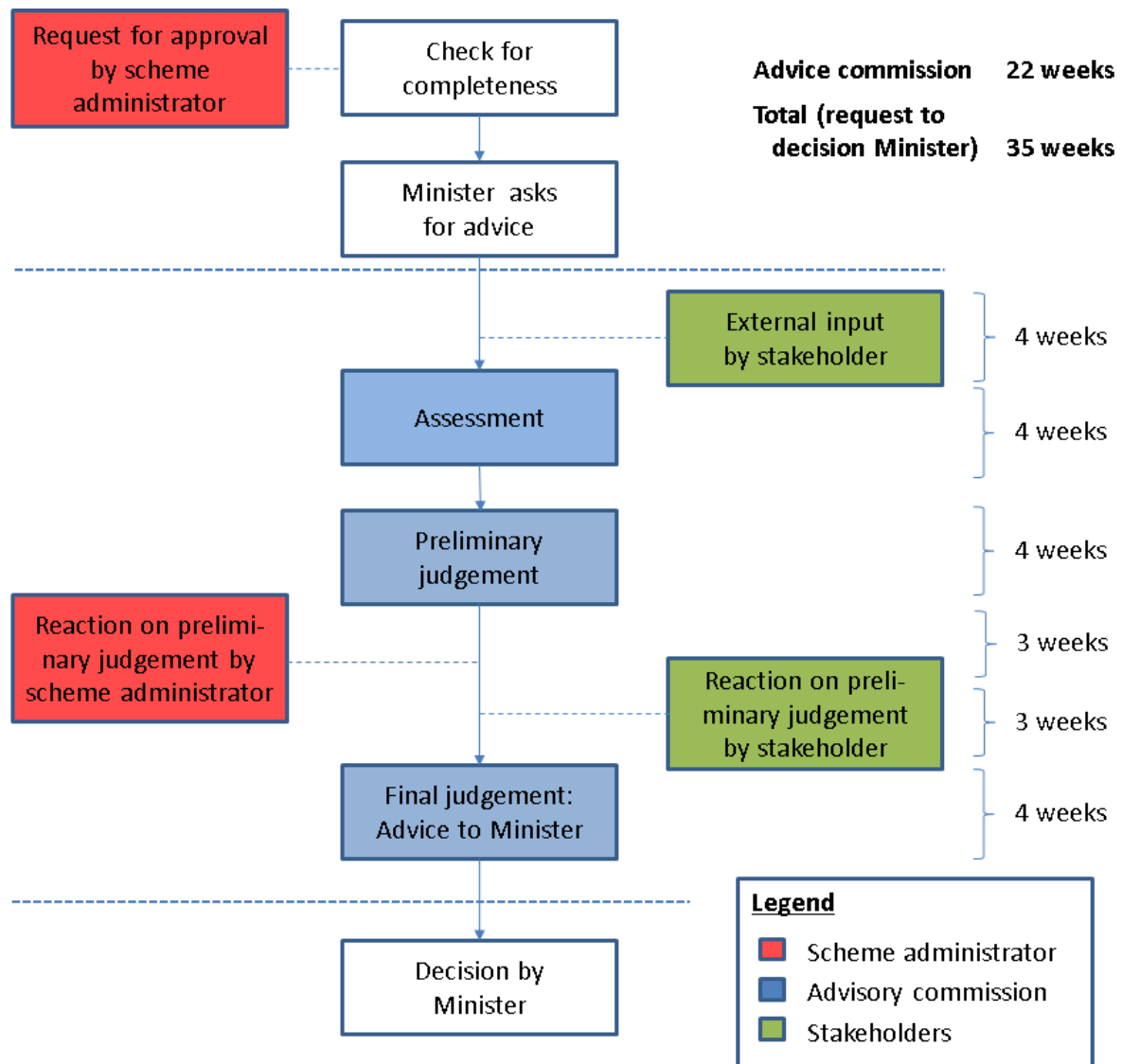
2.1 Assessment protocol

The assessment procedure of the advisory commission is described in a document called "toetsingsprotocol" (assessment protocol). The actual version of this protocol can be found on the [website of the advisory commission](#). The assessment protocol is available in Dutch language only. An English summary of the assessment procedure can be found on [this webpage](#).

The Bonsucro certification scheme is assessed using version 2.5 of the assessment protocol.

2.2 Summary of the assessment procedure

Schematically the procedure is visualised in the figure below.



2.3 Application by Bonsucro

The Bonsucro scheme manager made an application to the Dutch ministry of EZK in which approval of the Bonsucro certification scheme is requested for:

- the Dutch sustainability criteria under Principles P1, P12 (except for 12.6) and P13;
- biomass category 5; and
- geographical coverage “Global”.

Application of the Bonsucro certification scheme for biomass to fulfil the Dutch legal sustainability requirements for solid biomass results in the claim “Bonsucro EU-RED compliant” plus scope “Bagasse-NL”. The current ADBE advice is on this claim including additional scope. The ADBE advice is not on the claim “Bonsucro compliant”.

The following scheme documents were used for the assessment of the application:

- Bonsucro Standard Development and Revision procedure v1.4
- Bonsucro Outcome Report 2018
- Bonsucro Certification Protocol v5.1
- Bonsucro Chain of Custody Standard v5.1
- Bonsucro EU Chain of Custody Standard v5.1
- Bonsucro EU Production Standard v4.2
- Bonsucro Complaint Resolution Process (October 2017)
- Bonsucro Final draft amendment publication NL
- SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)

2.4 Timeline of the Bonsucro assessment

The commission received a request for advice from the Minister of EZK on the Bonsucro application on February 3, 2020.

The commission completed its preliminary judgement on the Bonsucro scheme by mid-March 2020. Subsequently this preliminary judgement was sent for comments to the scheme manager. The Bonsucro scheme manager responded on April 2. By mid-May 2020 he submitted a new scheme document “Bonsucro Final draft amendment publication NL”, after which the assessment procedure was temporarily stopped. The commission concluded on May 19th, 2020 that the changes in the scheme document were limited and that it could continue the procedure at the step “Final judgement / Advice to Minister”. The stopping of the assessment procedure and the conclusion by the commission were publicly announced in an ADBE news message on May 19, 2020.

Bonsucro published the document “SCH-Bonsucro-additional-requirements-bagasse-Netherlands-v1” on June 22, 2020. The commission has verified that the content of this document is the same as the content of the document “Bonsucro Final draft amendment publication NL”. Subsequently the commission finalised its advice on the Bonsucro certification scheme on June 24, 2020. The advice consists of a cover letter plus this report. The advice was sent to the minister of EZK on June 26, 2020.

2.5 External input

Stakeholders have been given the opportunity to submit external input to the commission. The possibility to send in external input was announced by a news message on February 4, 2020, and input could be submitted in the period from February 4 to March 3, 2020. No external input was received.

3 Summary of findings on the Bonsucro certification scheme

A summary of the commission's findings on the application for approval by the Bonsucro certification is given in the three paragraphs of this chapter 3. Details on the commission's findings are given in chapter 4 "Full assessment tables for the Bonsucro certification scheme". In chapter 4 reference is made to the "Dutch regulation", which is the Dutch *regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*. The sustainability and management criteria referred to by the numbers in this chapter and listed in chapter 4 are copied from the Dutch regulation.

The commission's final judgement, based on the combined findings as described below, is that Bonsucro can be approved for sustainability criteria 12.1, 12.2, 12.3, 12.4, 12.5 and 13.1, 13.2 and 13.3 for biomass category 5 for the Bonsucro claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL".

3.1 Findings on classification of biomass and on the first link in CoC to be certified

The current report is based on the Bonsucro application for approval for biomass category 5 and for sustainability criteria under principles P1, P12 and P13. The commission has concluded that Bonsucro certified companies are required to provide the information necessary to determine the biomass category later in the Chain of Custody (CoC).

The commission has concluded that the requirements on the first link in the CoC from the Dutch regulation are met by Bonsucro.

3.2 Findings for management criteria

A certification scheme can only be approved if the scheme complies with all management criteria. The ADBE concluded that Bonsucro complies with all management criteria. The table in paragraph 4.2 gives further details.

3.3 Findings for individual sustainability criteria

The Minister of EZK will approve certification schemes per claim and per individual sustainability criterion from the Dutch legal legislation based on the advice by the commission. The commission has assessed compliance against the Dutch legal sustainability criteria for the Bonsucro certification scheme based on the claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL". The scope "Bagasse-NL" ensures that the certification has taken place also against the requirements in the Bonsucro document "Bonsucro-additional-requirements-bagasse-Netherlands". The commissions' advice does not apply to the claim "Bonsucro compliant" as this claim does not address the same sustainability criteria.

The table below summarises the findings of the advisory commission. The table below does not show names or descriptions of the individual criteria, please refer to the table in paragraph 4.3 for further details. Green colours indicate the criteria for which the ADBE will give a positive advice to the Minister of EZK.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	*							
P2: Soil quality								
P3: Carbon sinks								
P4: Long-term carbon debt								
P5: Indirect Land Use Change (ILUC)								
P6: Laws and regulations								
P7: Biodiversity								
P8: Regulating effect and quality, health and vitality of forest								
P9: Production capacity, safeguard future of forests								
P10: Management system								
P11: Forest management by a group or regional association								
P12: Chain of custody system	**	**	**	**	**			
P13: Chain of custody system for a group	**	**	**					

*: Please note that the commission scores only the second part of criterion 1.1 as the first part cannot be complied with through certification, see also the text under criterion 1.1 in paragraph 4.3.

** : Please note that the advice from the commission applies to the claim “Bonsucro EU-RED compliant” plus scope “Bagasse-NL” and not to the claim “Bonsucro compliant” as the claim “Bonsucro compliant” does not address the same sustainability criteria.

Legend

Dark green colour :	The sustainability criterion is fully addressed by Bonsucro.
Light green colour :	The sustainability criterion is largely addressed by Bonsucro. Supplementary verification or another approved certification scheme is not needed
Orange colour :	The sustainability criterion is partly addressed by Bonsucro. Supplementary verification or another approved certification scheme is needed for those elements that are not addressed.
Red colour :	The sustainability criterion is not or is insufficiently addressed by Bonsucro. Additional verification or another approved certification scheme is required for the entire sustainability criterion.
Grey colour :	No request for approval.

4 Assessment tables for the Bonsucro certification scheme

This chapter contains three paragraphs on respectively a number of general topics of the Bonsucro application (4.1), on the management criteria (4.2), and on the sustainability criteria for the claim “Bonsucro EU-RED compliant” plus scope “Bagasse-NL” (4.3). The scores “3”, “2”, “1” and “0” plus the colours that are used in the tables in this chapter, are explained in the legend on the previous page.

4.1 Assessment of classification of biomass and on first link in CoC to be certified

Annex D of the Dutch regulation contains two tables (which are copied into Annex I of this report) with a number of general requirements on biomass categories and on the first link in the CoC to be certified. The ADBE has assessed whether the Bonsucro certification scheme meets these requirements. One important aspect is whether the scheme requires the certified companies to distinguish between the five biomass categories from this Annex in the Dutch regulation.

The ADBE concludes that the Bonsucro certification scheme meets these general requirements. For instance, the certified companies need to “check both for incoming certified products as for supply of certified products that the specification of the product is described, and hence it is known whether the product is from Sugarcane, Sugarcane juice, Sugarcane molasses, Sugarcane bagasse, Sugarcane straw or Sugarcane thrashes (tops, leaves, roots)”. Economic operators further down the supply chain can use this information to determine whether or not the biomass falls under category 5 “Biogenic residues and waste”. In case of the scope “Bagasse-NL” the certified companies need to check for both incoming products as for supply of certified products that the material is “Bagasse-NL” and hence is certified also against the requirements in the document “SCH Bonsucro additional requirements bagasse Netherlands v1”.

4.2 Assessment table for management criteria

The table below contains details of the assessment of the advisory commission on the Bonsucro certification scheme against the Dutch management criteria from the “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”.

Management criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”		ADBE judgement on whether the Bonsucro certification scheme complies with the management criteria	Score
1	A widely supported need exists for the scheme and for the conformity assessments that are performed based on the scheme.	Bonsucro has established a global sustainability certification system for sugarcane products which covers the entire supply chain. It can be used to prove compliance with Bonsucro sustainability and Chain of Custody requirements and/or with Chain of Custody requirements from the European Renewable Energy Directive. Bonsucro has a membership structure (540 members in 43 countries). Early 2020 124 Sugarcane mills were certified against the Bonsucro production standard. 50 companies were Bonsucro Chain of custody certified. The commission concludes that Dutch management criterion 1 is fully addressed by Bonsucro.	3
2	The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone.	Bonsucro is a multi-stakeholder organisation: anyone can become a member of Bonsucro. Stakeholders can also apply to participate in Standard Revision Working Groups for the development of updating of Bonsucro standards.	3

		<p>Calls for participation in such working groups are publicly made via Bonsucro news posts. Moreover, stakeholders can participate in public consultations.</p> <p>The commission has checked – for the Bonsucro Production Standard (version 4 from 2016 plus version 5 under development) and for the Bonsucro Chain of Custody Standard (version 5) - whether the consultation process as described in paragraph 5.3 of the Bonsucro Standard Development and Revision Procedure (v1.4) was actually followed. The commission concludes that this has been the case, based on the following information:</p> <ul style="list-style-type: none"> • The description of stakeholder consultations in Chapter 1 “Introduction” of the Bonsucro Production Standard version 4.2. • The Production Standard pre-consultation (2019-04-12 until 2019-05-17), that was announced in a Bonsucro news post on 16 April 2019. • The Chain of Custody Standard consultation, that was announced in a Bonsucro News post on 24th October 2018. Earlier (news post of 22 August 2018) Bonsucro invited stakeholders to join the Standard Revision Working Group for the adaptation of the CoC Standard. The stakeholder comment synopsis on the 2018-2019 CoC Standard revision is available online. <p>Descriptions of the process including the stakeholder consultation and stakeholder comments are also available on the Bonsucro web page “Standards Development & Revision”.</p> <p>The commission has noticed that the procedure includes the possibility of making urgent substantive changes (paragraph 6.5 in the Standard Development and Revision Procedure). While doing so the Technical Advisory Board of Bonsucro can allow diversion of stakeholder consultation. Diversion of stakeholder consultation is also possible by the Board of Bonsucro when changes in legislation occur that affect the application of the Bonsucro Standards or their legal recognition (paragraph 6.6). The commission understands the reasoning for these diversions. On urgent substantive changes the commission noticed that these can only be made after a CB made an exemption request when the certified company can – for a reason to be described by the CB – not comply to the standard. As part of the exemption request, the CB shall provide a justification for the variation including an explanation of how the request does not alter the conformity of the operator with the Bonsucro Standards. Therefore the commission concludes that these two reasons for making changes to Bonsucro standards (legally binding substantive changes and urgent substantive changes) can only be followed in specific circumstances. The general rule under Bonsucro is that scheme development and making changes to scheme documents requires stakeholder consultation, with the two mentioned allowed diversions. As a result the commission concludes that Bonsucro fully addresses Dutch management criterion 2.</p>	
3	<p>The methods related to the development of the scheme are documented and at least include the organisations participating in the development of the scheme and the decision-making process for the development of the scheme.</p>	<p>The Bonsucro Standard Development and Revision procedure (version 1.4 of October 2019) contains detailed requirements on (a) the decision to start developing a new, or revising an existing, Bonsucro international standard; (b) the process to develop or revise a Bonsucro International standard including a paragraph 5.3 on Public consultation, a paragraph 5.4 on decision making and a paragraph 5.5 on approval of the standard; and (c) on publication and implementation. The procedures in chapters 4, 5 and 6 of this document include the roles of the Bonsucro Board of Directors (BD), the Bonsucro Technical Advisory Board (TAB), the Bonsucro secretariat, the Working Group, stakeholders, the Bonsucro Members Council, and Certification Bodies.</p> <p>As a result the commission concludes that Dutch management criterion 3 is fully addressed by Bonsucro.</p>	3
4	<p>It can be demonstrated that during the development of the scheme and as part of the scheme management expertise of the sustainability requirements covered by the scheme is applied.</p>	<p>In case a Bonsucro Standard is to be developed or revised, the Bonsucro Board of Directors shall direct the Bonsucro Technical Advisory Board (TAB) to establish a working group. According to paragraph 4.7.2 of the Bonsucro Standard Development and Revision procedure, this working group will include individuals based on (a.o.) expert knowledge and/or experience of the issue(s) under consideration.</p> <p>The commission has checked the composition of the working group which were established during two recent</p>	3

		<p>Standard Revisions:</p> <ul style="list-style-type: none"> The recently launched revision of the Bonsucro Production Standard. A news message including a call to join the Standard Revision Working Group was published in April 2019, this call asked for “<i>Independent members: 5-8 experts will be selected for their technical proficiency and knowledge in either social, environmental, economic issues present in sugarcane</i>”. In June 2019 Bonsucro announced that “Members of Standard Revision Working Group were appointed”. This message includes biographies of the workgroup members which – according to the commission – demonstrate that members have relevant expertise. The revision of the Bonsucro Chain of Custody Standard revision in 2018 and 2019. Bonsucro invited stakeholders to join the Standard Revision Working Group for the adaptation of the CoC Standard (news post of 22 August 2018) and contracted two leading independent experts to facilitate the revision process (news post of 24 September 2018). The working group consisted of five members (for details see this news message). <p>The commission has also looked into the composition and background of individuals of the management team, board of directors, members’ council and technical advisory board (via this web page) and concludes that relevant expertise is available. As a result, the commission concludes that Bonsucro fully addresses Dutch management criterion 4.</p>	
5	The scheme is publicly available or accessible under fair, reasonable and non-discriminatory conditions.	<p>Bonsucro requires – through 6.1.1 from the Bonsucro Standard Development and Revision procedure – that its Standards are published on the Bonsucro website within 30 days of approval. The commission has checked whether the Standard documents as listed in paragraph 5.1 of this report are publicly available on the Bonsucro website. This is indeed the case for all documents, with the note that although most documents can easily be found on the Bonsucro website, this is not so for the document “Bonsucro Complaint Resolution Process” which needs to be found via the search function on the Bonsucro website. Besides, at least two unnumbered versions can be found on the Bonsucro website one of which does not contain a date in the file itself. The link to the file (so the text on the website) does contain a date.</p> <p>As the scheme documents are all publicly available, the commission concludes that Dutch management criterion 5 is fully addressed by Bonsucro. The lack of version number/date of the document “Bonsucro Complaint Resolution Process” is taken into account in the commissions’ judgement under management criteria 7 and 8.</p>	3
6	The scheme manager limits the use of the scheme to the conformity assessment bodies he has entered into an agreement with, unless the scheme owner itself is the only conformity assessment body.	<p>Bonsucro requires CB’s to become “Bonsucro accredited”, based on requirements in chapter 5 “Accreditation process” of the Bonsucro certification protocol. Only CB’s that are accredited by Bonsucro shall be allowed to issue certification of conformity against Bonsucro standards. The accreditation by Bonsucro requires a contractual agreement to be signed between the CB and Bonsucro. Only CB’s that have signed such a contract are allowed to perform Bonsucro certification activities. The commission has seen a template of this contract that was provided by the Bonsucro scheme manager, and concludes that this is indeed a contract allowing the CB to carry out certification activities using the Bonsucro certification scheme. As a result, the commission concludes that Bonsucro limits the use of the scheme to CB’s that have entered an agreement with Bonsucro, and hence the commission concludes that Bonsucro fully addresses Dutch management criterion 6.</p>	3
7	The scheme manager has enforced effective procedures for handling complaints and appeal. Appeal is treated by persons that are not directly involved in the development and the management of the document.	<p>Bonsucro has a procedure in place for handling complaints and appeals. In the “objective and scope” paragraph of the Bonsucro complaint resolution process document, it is described for which kind of complaints and appeal the process is designed. This includes complaints/appeal against certification decisions by auditors and against actions or decisions by Bonsucro. The latest category (item c. in the Bonsucro complaint resolution process document) includes the development and the management of the Bonsucro scheme.</p> <p>Appeals will be heard and decided upon by a panel consisting of the Bonsucro chair of Directors and three other Bonsucro member representatives. The Bonsucro procedure on appeal requires that “<i>no person shall act as either a panel member or secretary to the panel if there is any direct or indirect conflict of interest</i>”. As a result, the commission concludes that the appeal is to be treated by impartial Bonsucro staff and Bonsucro member representatives. Therefore, the commission concludes that the Dutch management criterion 7 is addressed by Bonsucro based on the version of the Bonsucro complaint resolution process that was assessed (the pdf document</p>	2

		<p>from October 2017). The conclusion would be the same on the basis of the website version on the Bonsucro web page "Making a complaint".</p> <p>The commission however notes that (1) Bonsucro does not publicly give clarity on which version of the Bonsucro complaint resolution process applies, and (2) there are differences between the two versions, for instance on the subject whether complaints that fall outside the three common areas mentioned will also be considered by Bonsucro. The combination of (1) and (2) can lead to discussions between stakeholders and Bonsucro. This may create confusion about which version applies. As a result, the commission concludes that Bonsucro largely addresses Dutch management criterion 7.</p>	
8	The scheme manager has a scheme version management system in place.	<p>Bonsucro has no documented version management system other than requirement 6.1.5 from the Bonsucro Standard Development and Revision procedure which stipulates that "<i>Bonsucro shall keep a file of all records made during standards development and revision activities (consultation comments, how they were taken into account, list of stakeholders, interested parties involved, draft and final versions of the standard, etc.)</i> ..[..].. . Bonsucro does require, however, in several parts of chapter 6 of the Bonsucro Standard Development and Revision procedure, that updated standard documents shall be clearly identified with a new version number and date. The commission noted that all Bonsucro standard documents have a version number and a date. Also most of the procedural documents from Bonsucro have version numbers, such as the Bonsucro Standard Development and Revision procedure and the Bonsucro certification system. However, Bonsucro does not apply this version management systematically to all Bonsucro documents. For instance: the document "Bonsucro Complaint Resolution Process" does not have a version number. It neither contains a clear date in the document itself (with the exception for some of the versions of the document, that contain as a footnote the text "As revised by the Board on <date>". The commission therefore concludes that Bonsucro largely addresses Dutch management criterion 8.</p>	2

4.3 Assessment tables on sustainability criteria for the claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL"

The advisory commission has assessed whether the Bonsucro certification scheme and its claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL" addresses the Dutch sustainability criteria from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden". The assessment results are given in the tables below.

General point		
0.1	Bonsucro claim	<p>Because the claim for which Bonsucro applied for approval is "Bonsucro EU-RED compliant", the ADBE has to assess the indicators from the Bonsucro EU-RED ChoC standard. As an end user cannot tell from the claim "Bonsucro EU-RED compliant" whether or not the requirements from the Bonsucro document "SCH-Bonsucro-additional-requirements-bagasse-Netherlands-v1" were taken into account, the advice will be made for the claim "Bonsucro EU-RED compliant" plus the scope "Bagasse-NL". This additional scope ensures that the Bonsucro document "SCH-Bonsucro-additional-requirements-bagasse-Netherlands-v1" is used during certification and that the scope "Bagasse NL" is passed on through the chain-of-custody.</p>
0.2	Objective of Bonsucro EU-RED ChoC standard	<p>The objective of the Bonsucro EU-RED ChoC standard refers to biofuels and bioliquids and to the European Renewable Energy directive (the one currently in force; directive 2009/28/EC). This RED does not contain the sustainability criteria for solid biomass. Nevertheless the Bonsucro standard can be used to show compliance to some of the solid biomass sustainability criteria.</p> <p>Through an amendment to the Certification scope made in the document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" the Bonsucro scheme now refers to the Dutch sustainability criteria for solid biomass.</p>

0.3	Passing on the certification scope through the CoC	<p>After the ADBE posed some questions to which the Bonsucro scheme manager replied, it has become clear that a Bonsucro certified company can only sell a sustainable type of product (such as refined sugar, ethanol, molasses or bagasse) if this material is listed "yes" on the Bonsucro "Certified members" web page showing certified companies including the scope of their certificates. As a result the commission concludes that the certification scope is passed on through the CoC, as each auditor along the CoC will check whether or not the information to be passed on to the next owner is accompanied with the proper information including "Evidence showing compliance with the Bonsucro EU-RED Production Standard" and a "Specification of original raw material or intermediary product: Sugarcane, Sugarcane juice, Sugarcane molasses, Sugarcane bagasse, Sugarcane straw, Sugarcane thrashes (tops, leaves, roots)". Both are required through Bonsucro EU-RED ChoC standard indicator 2.1.5. As soon as the first producer has been certified against the document "SCH-Bonsucro-additional-requirements-bagasse-Netherlands-v1", the material "Bagasse NL" will be added to this list.</p>
0.4	Multi-site certification	<p>Via Multi-site certification, Bonsucro allows:</p> <ol style="list-style-type: none"> 1. different sites within one legal entity to be combined in one certificate as long as the sites are for storage/tanks or any other holding facility; and 2. different sites within different legal entities that fall under (e.g.) a common holding company to be combined in one certificate, as long as the sites are for storage/tanks or any other holding facility. <p>Under the Dutch sustainability criteria, the first option is allowed. The commission comes to this conclusion from the first condition under Dutch sustainability criterion 12.5 which stipulates "<i>The method shall be applied at least at the level of a location</i>". From this condition the commission concludes that under the Dutch sustainability criteria it is allowed that a legal entity is CoC-certified for multiple locations, as long as the mass balance method is applied per individual location.</p> <p>The commission has also concluded that under the Dutch sustainability criteria the second option above does not fulfil the three criteria on group certification (principle 13). These criteria give requirements that have to be met in case two or more legal entities would like to be jointly certified for their CoC activities. As the Dutch criteria under P13 do not contain an exemption for rather straightforward kind of operations such as storage in tanks, the commission concludes that the three conditions have to be met for all legal entities independent of the complexity of their operations.</p> <p>In the document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)", Bonsucro adds the requirement that companies seeking certification of Bagasse against the Dutch sustainability criteria for solid biomass for energy applications shall only include in their unit of certification more than one sites if they belong to a single and same legal entity.</p> <p>As a result, this point of attention has been solved by Bonsucro.</p>

Principle 1: The use of biomass leads to a substantial reduction in greenhouse gas emissions calculated across the entire chain in comparison with the use of fossil fuels			
	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"	ADBE judgement on whether the Bonsucro certification scheme complies with the sustainability criteria	Score
1.1a	The reduction in CO ₂ -eq emissions is calculated to be a minimum of 70% per year on average based on the EU reference value. The average emissions have a maximum of 56 g CO ₂ -eq/MJ for electricity and 24 g CO ₂ -eq/MJ for heat.	<p>Dutch sustainability criterion 1.1 consists of three parts:</p> <ul style="list-style-type: none"> • <u>The reduction in CO₂-eq emissions is calculated to be a minimum of 70% per year on average based on the EU reference value. The average emissions have a maximum of 56 g CO₂-eq/MJ for electricity and 24 g CO₂-eq/MJ for heat.</u> <p>To the opinion of the commission it is impossible to demonstrate compliance with this part a of the sustainability requirement by using a certification scheme, as compliance can only be demonstrated afterwards (looking back at all consignments of biomass used during a year) and by looking at consignments that were possibly delivered using multiple certification schemes. Bonsucro does therefore not cover this part of the criterion.</p>	1
1.1b	No consignment of biomass shall result in emissions above 74 g CO ₂ -eq/MJ for electricity and 32 g CO ₂ -eq/MJ for heat. The calculated maximum		

	<p>CO₂-eq emission levels are based on the most recent European Commission publication on sustainability criteria for biomass and on the reference values provided for fossil fuels.</p>	<ul style="list-style-type: none"> • <u>No consignment of biomass shall result in emissions above 74 g CO₂-eq/MJ for electricity and 32 g CO₂-eq/MJ for heat.</u> The Bonsucro Production Standard v4.2, Indicator 6.1.1, gives maximum GHG emissions per MJ of biofuel, whereas the sustainability criteria in the Dutch regulation give maximum GHG emissions per MJ electricity or heat. The document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" gives the values 74 and 32. As a result, this part of the criterion is covered by Bonsucro. • Part (b) second requirement: <u>The calculated maximum CO₂-eq emission levels are based on the most recent European Commission publication on sustainability criteria for biomass and on the reference values provided for fossil fuels.</u> The Bonsucro Production Standard makes (in Principle 6 and in Annex 3) reference to the Renewable Energy Directive (2009/28/EC), the revised Fuel Quality Directive (2009/30/EC) and Directive 2015/1513 for GHG default values and for making GHG actual calculations. These EU directives contain a different GHG emission methodology than that for solid biomass. The document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" requires that – in case biomass is delivered to the Netherlands to comply with the sustainability criteria for solid biomass, that GHG calculations have to be made in accordance with COM(2020)11, SWD(2014)259 and JRC report EUR 27215 EN. As a result, this part of the criterion is covered by Bonsucro. <p>The commission concludes that Dutch sustainability criterion 1.1 is partly addressed by Bonsucro.</p>	3
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Principle 12: A chain of custody system is in place for the biomass, covering the entire chain from the first actor to the energy producer, that links the source to the material used in the product or product group, and provides greenhouse gas emission data of each individual link.			
	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"	ADBE judgement on whether the Bonsucro certification scheme complies with the sustainability criteria	Score
12.1	Each link in the chain of custody bears final responsibility and has a quality management system in place that provides safeguards for compliance with the requirements of the chain of custody system.	In indicators 1.1.1, 1.1.2, 1.1.3 and 1.1.5, the Bonsucro EU-RED ChoC Standard includes requirements on management responsibility, procedures and/or work instructions, record keeping and documentation of the procedure for the annual internal audit process. As all companies ("links") in the Bonsucro EU-RED Chain-of-Custody need to be certified against the Bonsucro ChoC standard and hence need to document their commitment to implement and maintain the Bonsucro EU-RED ChoC requirements, the commission concludes that Bonsucro covers the first part of this criterion. All links of the EU-RED ChoC also need to comply with indicators 1.1.2, 1.1.3 and 1.1.5 which include elements of a quality management system, and hence the commission concludes that Dutch sustainability criterion 12.1 is fully addressed by the claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL".	3
12.2	Each link in the chain of custody has the relevant greenhouse gas emissions information for its own organisation, which has been obtained using a methodology that is based on the most recent European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels.	Dutch sustainability criterion 12.2 consists of two parts: 1. <u>Each link in the chain of custody has the relevant greenhouse gas emissions information for its own organisation...</u> The indicators 2.1.2, 2.1.5, 2.2.1, 2.2.2, 2.2.3 of the Bonsucro EU-RED ChoC standard contain detailed requirements on which information must be collected by each link in the CoC and how GHG related information has to be passed on through the CoC from one company to the next. As a result, the commission concludes that Bonsucro covers this part of the criterion based on the Bonsucro EU-RED ChoC standard. 2. <u>...which has been obtained using a methodology that is based on the most recent European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels.</u> The Bonsucro EU-RED ChoC standard makes reference to a GHG calculation methodology in the Renewable Energy Directive (2009/28/EC). This is a methodology for biofuels and bioliquids. The GHG calculation	3

		<p>methodology for solid biomass is slightly different. The document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" requires that – in case biomass is delivered to the Netherlands to comply with the sustainability criteria for solid biomass, that GHG calculations have to be made in accordance with COM(2020)11, SWD(2014)259 and JRC report EUR 27215 EN. As a result, the commission concludes that Bonsucro covers this part of Dutch criterion 12.2.</p> <p>As a result, the commission concludes that Dutch sustainability criterion 12.2 is fully addressed by the Bonsucro claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL".</p> <p>The commission notes that Bonsucro ChoC documents contain correct instructions on what to do when total-pathway default values are to be used (in such a case no GHG values are to be transferred through the CoC, see indicator 2.2.3). This means that Bonsucro does meet criterion 12.2 in case of using total-pathway default values.</p>	
12.3	Each link in the chain of custody keeps all necessary documentation for demonstrating compliance with the applicable sustainability requirements available for a minimum of 5 years.	The Bonsucro EU-RED ChoC standards stipulate (1.1.3) that " <i>the organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of the Bonsucro ChoC Standard requirements. Retention times for all records and reports shall be a minimum of five (5) years</i> ". As a result the commission concludes that Dutch sustainability criterion 12.3 is fully addressed by the claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL".	3
12.4	Each link in the chain of custody registers for all incoming or outgoing consignments the quantities and required sustainability information based on the Dutch regulation "conformity assessment sustainability biomass for energy purposes".	<p>The commission is of opinion that the following eight pieces of information have to be passed on through the CoC and therefore have to be registered for all incoming or outgoing consignments by each link in the CoC:</p> <ol style="list-style-type: none"> <u>Biomass category or information allowing to unambiguously determine the biomass category.</u> Bonsucro EU-RED ChoC indicators 2.1.2 and 2.1.5 require that the economic operators checks both for incoming certified products as for supply of certified products that the specification of the product is described, and hence it is known whether the product is from Sugarcane, Sugarcane juice, Sugarcane molasses, Sugarcane bagasse, Sugarcane straw or Sugarcane thrashes (tops, leaves, roots). As a company later in the CoC can use this information to determine whether or not the biomass falls under category 5 "Biogenic residues and waste", the commission concludes that the Bonsucro EU-RED ChoC standard covers this information requirement. <u>For category 2 biomass: has the sustainability been demonstrated at regional or at forest management level?.</u> Not relevant as Bonsucro did not apply to be approved for biomass category 2. <u>For category 1 and 2 biomass: is the biomass controlled biomass?</u> In its application for approval the Bonsucro scheme manager indicated that Bonsucro does not apply for "controlled biomass" nor for approval for biomass categories 1 and 2. As a result this part of the criterion is not applicable. <u>Country of origin of the feedstock.</u> Bonsucro EU-RED ChoC indicators 2.1.2 and 2.1.5 require that the economic operators checks both for incoming certified products as for supply of certified products that the specification of the product includes the country of origin. In guidance to these two indicators it is explained that 'country of origin' is the country where the sugar cane was grown. As a result, the commission concludes that Bonsucro covers this part of the criterion. <u>The kind of GHG emission value that is being used: (a) a total default value, (b) an actual value(s), or (c) a combination of disaggregated default values and actual values.</u> Bonsucro EU-RED ChoC indicators 2.1.2 and 2.1.5 require that the economic operators checks both for incoming certified products as for supply of certified products that "Whenever default GHG values are used, the mention "default value". These two indicators also give requirements on how to pass on actual GHG emissions (following requirements from the RED directive). As a result, the commission concludes that Bonsucro covers this part of the criterion. <u>In case actual values are being used: the GHG emission in g CO_{2,equivalent} per MJ or ton biomass produced.</u> Bonsucro EU-RED ChoC indicators 2.1.2 and 2.1.5 require that the economic operators checks both for incoming certified products as for supply of certified products that the delivery contract, invoice and/or supporting 	3

		<p>documentation, ..[...].. meet the following requirements:</p> <ul style="list-style-type: none"> • Whenever actual GHG values are used, the actual GHG values [kg CO₂eq] per dry tons (sugarcane, sugar, molasses, bagasse and other intermediary products) or per MJ (bioethanol) calculated according to the Annex V of the EU Renewable Energy Directive (2009/28/EC), Annex IV of the EU Fuel Quality Directive (2009/30/EC), and Annex II of Directive 2015/1513 and EC Note BK/abd/ener.c.1(2015)4507918, using any EC-approved GHG calculation tool. • The document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" requires that – in case biomass is delivered to the Netherlands to comply with the sustainability criteria for solid biomass, that GHG calculations have to be made in accordance with COM(2020)11, SWD(2014)259 and JRC report EUR 27215 EN. • Accurate data on all relevant elements of the emission calculation formula, (i.e. eec, el, ep,etd and eee). See also Annex 3 of Bonsucro Production Standard for more details. <p>As a result, the commission concludes that Bonsucro covers this part of the criterion on requirements to pass-on information on actual GHG values.</p> <p>7. <u>The certification scheme (plus any additional verification statement(s)) which are used to demonstrate compliance with the sustainability criteria under principles P2-P11.</u> The Bonsucro application for approval is for biomass category 5 which does not have to comply with the sustainability criteria under principles P2-P11. As a result, the commission concludes that this requirement is not applicable for this application for approval for category 5 biomass.</p> <p>8. <u>The certification scheme (plus any additional verification statement(s)) which are used to demonstrate compliance with the CoC criteria under principles P12-P13.</u> As Bonsucro does not take over claims from other certification schemes (as can be concluded from indicator 2.1.1 from the Bonsucro EU-RED ChoC Standard), Bonsucro certified material will be delivered to the end-user through the Bonsucro Chain of Custody system, unless the last part of the CoC is taken care of by another NL-approved CoC system. As a result, the commission concludes that Bonsucro covers this part of the criterion.</p> <p>The commission found that Bonsucro covers parts 1, 4, 5, 6 and 8 of the criterion. The remaining parts 2, 3 and 7 are not relevant as this Bonsucro application is for biomass category 5. The commission therefore concludes that Dutch sustainability criterion 12.4 is fully addressed by the claim "Bonsucro EU-RED compliant" plus scope "Bagasse-NL".</p>	
12.5	<p>Each link in the chain of custody applies a mass balance in case of mixing or splitting of materials with different sustainability characteristics. For the mixing the following applies:</p> <ul style="list-style-type: none"> - The method shall be applied at least at the level of a location; - The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results; - All sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities of the individual consignments, taking account of the applicable conversion factors. 	<p>The criterion 12.5 consists of four parts:</p> <ol style="list-style-type: none"> 1. <u>Each link in the chain of custody applies a mass balance in case of mixing or splitting of materials with different sustainability characteristics.</u> The Bonsucro EU-RED ChoC Standard stipulates in indicator 1.1.6 that "each site in a multi-site certificate shall maintain its own mass balance calculations and records. Mass balance data shall not be transferred between sites for the purpose of calculating mass balance volumes". Indicator 2.1.6 stipulates "The inventory shall be undertaken at individual site level". As a result, Bonsucro covers this part of the criterion for the EU-RED ChoC Standard. 2. <u>The method shall be applied at least at the level of a location</u> This part is covered by Bonsucro through the Bonsucro EU-RED ChoC Standard as this standard requires that the CoC requirements are met at individual site level (indicators 1.1.6 and 2.1.6). 3. <u>The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results</u> Both Bonsucro ChoC standards require that the inventory period shall not exceed three months (indicator 2.1.7). As a result the commission concludes that Bonsucro covers this part of the criterion. 4. <u>All sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities of the individual incoming consignments, taking account of the applicable conversion factors.</u> 	3

		<p>This part of the criterion is covered by Bonsucro through indicator 2.1.2 from the Bonsucro EU-RED ChoC Standard which stipulates that “ <i>The receiving economic operator shall verify that the supplier contract, invoice and/or supporting documentation, including associated sustainability characteristics of Bonsucro EU-RED certified products meet the following requirements:</i></p> <ul style="list-style-type: none"> • <i>Specification of original raw material or intermediary product: Sugarcane, Sugarcane juice, Sugarcane molasses, Sugarcane bagasse, Sugarcane straw, Sugarcane thrashes (tops, leaves, roots).</i> • <i>..[.].</i> • <i>Evidence showing compliance with the Bonsucro EU-RED Production Standard.</i> • <i>Buyer and seller contact information.</i> • <i>Country of origin.</i> • <i>..[.].</i>”. <p>This documentation, which must be kept for a minimum of five years (indicator 1.1.3), allows to trace back the sustainability characteristics of mixed biomass output. As a result, the commission concludes that this part of the criterion is covered by Bonsucro.</p> <p>The commission concludes that Dutch sustainability criterion 12.5 is fully addressed by the claim “Bonsucro EU-RED compliant” plus scope “Bagasse-NL”.</p>	
12.6	When being mixed with other consignments category 1 and 2 consignments only complying with the requirements 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3 are distinguished as controlled biomass on a mass balance. For controlled biomass, the biomass producer is the first link in the chain of custody and the source is the forest management unit or a defined supply area.	Bonsucro did not apply for approval of this criterion.	-

Principle 13: In case of a group management system for the chain of custody the same requirements apply to the group as a whole as to individual businesses			
	Sustainability criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden”	ADBE judgement on whether the Bonsucro certification scheme complies with the sustainability criteria	Score
13.1	A group is led by a legal entity that is responsible for the group as a whole. This entity uses a management system as well as technical and human resources that enable it to supervise the participating locations within the scope of the system. The entity conducts an annual audit of a sample of the affiliated group members.	<p>The commission has concluded that Bonsucro multi-site certification in case of multiple legal entities is similar to what is referred to as “group management system for the CoC” from the three Dutch sustainability criteria 13.1 – 13.3 under principle P13. This is further explained under general point 0.4.</p> <p>The Dutch criterion 13.1 consists of two parts:</p> <ol style="list-style-type: none"> 1. <u>A group is led by a legal entity who is responsible for the group as a whole.</u> In Bonsucro, the certified organisation (“economic operator” as defined in the Bonsucro EU-RED ChoC Standard) may only include a single legal entity. Bonsucro EU-RED ChoC standard indicator 1.1.6 stipulates that “<i>In the case of multi-site certification, the economic operator shall define and document the legal entities and sites covered by the multi-site Bonsucro EU-RED ChoC certificate, including details on the site designated as the Central Office for administering Bonsucro EU-RED ChoC data. Under Bonsucro EU-RED ChoC each site in a multi-site certificate shall maintain its own mass balance calculations and records</i>”. The Bonsucro ChoC standards contain – through the addition made to indicator 1.1.6 in the document “SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)” a requirement that the group leader is responsible for the group, and on 	3

		<p>termination of group membership in case group members do not comply with the Bonsucro ChoC requirements. Therefore the commission concludes that Bonsucro covers this part of the Dutch sustainability criterion.</p> <p>2. <u>This entity uses a management system as well as technical and human resources that enable it to supervise the participating locations within the scope of the system.</u> Indicators 1.1.1, 1.1.2, 1.1.3, 1.1.4 and 1.1.5 give requirements for management responsibility, written procedures/work instructions, record keeping, training and internal audits. Based on these indicators the commission concludes that Bonsucro covers the second part of the Dutch criterion.</p> <p>Hence, the commission concludes that Bonsucro fully addresses Dutch sustainability criterion 13.1.</p>	
13.2	<p>The group applies to the requirements 12.1 up to and including 12.6. Furthermore, each group member individually meets these requirements insofar as applicable to their own activities.</p>	<p>The commission has concluded that Bonsucro multi-site certification in case of multiple legal entities is similar to what is referred to as "group management system for the CoC" from the three Dutch sustainability criteria 13.1 – 13.3 under principle P13. This is further explained under general point 0.4.</p> <p>Indicator 1.1.6 from the Bonsucro EU-RED ChoC Standard contains the following requirement: "<i>Under Bonsucro EU-RED ChoC each site in a multi-site certificate shall maintain its own mass balance calculations and records</i>". The Bonsucro ChoC standards contain – through the addition made to indicator 1.1.6 in the document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" the requirement that "for companies seeking certification of Bagasse against the Dutch sustainability criteria for solid biomass for energy applications, the Central Office shall record a declaration submitted by each site in which they declare that they meet Bonsucro EU-RED Chain of custody requirements".</p> <p>As a result, the commission concludes that Bonsucro fully addresses Dutch sustainability criterion 13.2.</p>	3
13.3	<p>The group leader uses a registration system to record:</p> <ul style="list-style-type: none"> - the names and addresses of the members; - a declaration submitted by each member in which they declare that they meet chain of custody system requirements; - incoming and outgoing consignments of each individual group member. 	<p>The commission has concluded that Bonsucro multi-site certification in case of multiple legal entities is similar to what is referred to as "group management system for the CoC" from the three Dutch sustainability criteria 13.1 – 13.3 under principle P13. This is further explained under general point 0.4.</p> <p>The Dutch criterion 13.3 consists of three parts:</p> <ol style="list-style-type: none"> 1. <u>The group leader uses a registration system to record: - the names and addresses of the members ...</u> Indicator 1.1.3 of the Bonsucro EU-RED Choc Standard is on record keeping. It does not include a requirement for the group leader to register names and addresses of the group members. Indicator 1.1.6 stipulates that "<i>In the case of multi-site certification, the economic operator shall define and document the legal entities and sites covered by the multi-site Bonsucro EU-RED ChoC certificate, including details on the site designated as the Central Office for administering Bonsucro EU-RED ChoC data</i>". The commission is of opinion that "defining and documenting legal entities and sites" will include documenting names and addresses of these entities and sites. Therefore, the commission concludes that this part of the criterion is covered by Bonsucro. 2. <u>... a declaration submitted by each member in which they declare that they meet chain of custody requirements...</u> This part is covered by the addition to indicator 1.1.6 that Bonsucro made in the document "SCH Bonsucro additional requirements bagasse Netherlands v1 (June 2020)" that included the requirement that "the Central Office shall record a declaration submitted by each site in which they declare that they meet Bonsucro EU-RED Chain of custody requirements". 3. <u>... the incoming and outgoing consignments of each individual group member</u> This is covered by the following requirement from the part "System description" in the Bonsucro ChoC standards: "<i>One site shall be designated as responsible for maintaining the central administration of the ChoC requirements including the individual site mass balance accounting using an Internal Control System (ICS). This site is designated as the Central Office</i>". <p>As a result, the commission concludes that Bonsucro fully addresses Dutch sustainability criterion 13.3.</p>	3

5 Documents used for the assessment of the Bonsucro certification scheme

The following documents have been used for the assessment of the Bonsucro certification scheme.

5.1 Documents submitted by the scheme manager as part of the request for approval

1. [Bonsucro Standard Development and Revision procedure v1.4](#)
2. [Bonsucro Outcome Report 2018](#)
3. [Bonsucro Certification Protocol v5.1](#)
4. [Bonsucro Chain of Custody Standard v5.1](#)
5. [Bonsucro EU Chain of Custody Standard v5.1](#)
6. [Bonsucro EU Production Standard v4.2](#)
7. [Bonsucro Complaint Resolution Process \(October 2017\)](#)

5.2 Scheme document submitted by the scheme manager during the ADBE's assessment procedure

8. Bonsucro Final draft amendment publication NL
9. SCH Bonsucro additional requirements bagasse Netherlands version 1 (June 2020)

5.3 Additional documents assessed by the commission

10. Bonsucro Claims & Labelling Rules – Version 7.1 (October 2019)
11. Bonsucro Production Standard for Smallholder Farmers (June 2018)

Annex I – Biomass categories and the CoC system

The sustainability and management criteria in paragraphs 4.2 and 4.3 are a translation from the criteria in Annexes B and C of the Dutch regulation on conformity assessment of solid biomass for energy production . In Annex D of this regulation two tables show which requirements apply to the five categories and the set-up of the chain of custody. In the explanatory notes to the legislation a table can be found with additional guidance to the requirements.

Biomass categories and the chain of custody system

There are five biomass categories for which the sustainability requirements apply. In Table 1 for each category is listed which sustainability requirements apply:

Table 1. Biomass category’s with the applicable sustainability requirements

Category	Sustainability requirements	Greenhouse gas emission	Soil management	Carbon and land use change	Sustainable forest management	Chain of custody
1. Woody biomass from forest management units		1.1		3.1-3.3, 4.1-4.3, 5.1	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
2. Woody biomass from forest management units less than 500 ha		1.1		3.1-3.3, 4.1-4.3	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
3. Residues from nature and landscape management		1.1	2.1			12.1-12.6, 13.1-13.3
4. Agricultural residues		1.1	2.1			12.1-12.6, 13.1-13.3
5. Biogenic residues and waste		1.1				12.1-12.6, 13.1-13.3

The source of the five categories and controlled biomass has to be known for each consignment. The conformity assessment by a conformity assessment body starts at the first link of the chain of custody. In Table 2 for each category the source of the material and the first link of the chain of custody are listed.

Table 2. Distinction between the source and the first link in the chain of custody per biomass category

Category	Source	First link chain of custody
1. Woody biomass from forest management units	Forest management unit	Forest management unit
2. Woody biomass from forest management units less than 500 ha	Forest management unit or predefined supply base of which the forest management unit <500 ha forms a part	Forest management unit or biomass producer
3. Residues from nature and landscape management	Predefined supply base	First collection point
4. Agricultural residues	Predefined supply base	First collection point
5. Biogenic residues and waste	Company that generates the residues or waste	First collection point

As part of the SDE+ subsidy scheme a temporary exemption applies for category 2 biomass regarding the first link of the chain of custody. For this category either the forest management unit or the biomass producer can be the first link. In case the biomass producer is the first link a risk based approach is used to demonstrate compliance with the sustainable forest management requirements.

Annex II – Abbreviations

ADBE	Advisory commission Sustainability Biomass for Energy applications
BD	Board of Directors
CB	Conformity Assessment Body
ChoC	Chain-of-Custody (abbreviation used by Bonsucro)
CoC	Chain-of-Custody (abbreviation used by ADBE)
COM	Communication
EU	European Union
EZK	“Ministry of EZK” is the Dutch Minister of Economic Affairs and Climate Policy
GHG	GreenHouse Gas
ICS	Internal Control System
ILUC	Indirect Land Use Change
JRC	Joint Research Centre (part of the European Commission)
NL	Netherlands
RED	enewable Energy Directive
RVO	Netherlands’ Enterprise Agency
SDE+	A Dutch subsidy scheme (feed-in tariff) for production of renewable energy
SWD	Staff Working Document
TAB	Technical Advisory Board