Green*ergy* Brazilian Bioethanol verification programme:

Green*ergy* bioethanol sustainability criteria for Brazilian sugarcane

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This document, along with the **System description** (SYS DOC – 001), **Chain of Custody requirements** (COC DOC - 003), the **Auditor Requirements** (AUD DOC – 004) and the **GHG methodology** (GHG DOC – 005) forms the basis of the Green*ergy* Brazilian Bioethanol verification programme, which is administered by Green*ergy*.

Principle 1: CARBON CONSERVATION: Biomass production will not destroy or damage large above or below ground carbon stocks			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C1.1 Preservation of above and below ground carbon stocks relative to stocks on 1 January 2008.	I.1.1.1 Evidence that biomass production has not caused direct land use change, on or after 1 January 2008, which results in GHG emissions not meeting the minimum threshold for greenhouse gas savings.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED. Sugarcane plantations are long established in the North East and expansion is unlikely due to limits on available area. In the states of São Paulo, Paraná, Minas Gerais and Goias in the Centre-South, cropland such as soy and pasture have been long established and expansion into high carbon areas (e.g. continuously forested areas, wetlands and cerrado) is unlikely due to the Environmental Agencies strict law enforcement. However, in some areas of Goias state and in Mato Grosso state also in the Centre-South, there is increasing pressure to expand agricultural commodities. Of particular concern is expansion into the cerrado biome, which has significant below-ground carbon stocks. This requirement will normally be demonstrated with evidence showing that there has been no land use change, e.g. 'positive' evidence showing the area was already cropland in 2008. Use of earlier evidence is also possible, for example, if it is shown that land was cropland a little earlier than 2008, e.g.	Evidence of compliance can take many forms, for example: Aerial photographs Satellite images Maps Land register entries/databases Site surveys Management plans Environmental assessments of expansions since 1st January 2008, showing no conversion of natural ecosystems (e.g. continuously forested areas, wetlands or cerrado) since 1st January 2008 or earlier. Verification that the scope of the environmental licenses (issued since 1st January 2008) does not include conversion of high carbon areas. Interviews with state Environmental Agencies' staff and other stakeholders.

		in 2005, is also acceptable. Where there has been sugarcane expansion which is not on cropland or high carbon areas, measurements of CO_2 equivalent from land use change must be undertaken using the methodology set out in GHG DOC 005. The GHG minimum savings thresholds for the whole supply chain are: • 35% starting in 2010 (1 April 2013 for mills that were already in operation in January 2008) • 50% in January 2017 • 60% in January 2018 No Greenergy-compliant claim can be made after 1 April 2013 without meeting the 35% GHG threshold, regardless of when the sugarcane was grown and harvested (see also the SYS DOC 001)	
	I.1.1.2 Evidence that biomass production has not caused direct land use change of wetlands on or after 1 January 2008.	Wetlands are land areas covered with or saturated by water permanently or for a significant part of the year. An example is the pantanal. This requirement will normally be demonstrated with evidence showing that there has been no land use change, e.g. 'positive' evidence showing the area was already cropland in 2008. Use of earlier evidence is also possible, for example, if it is shown that land was cropland a little earlier than 2008, e.g. in 2005, is also acceptable.	Evidence of compliance can take many forms, for example: Aerial photographs Satellite images Maps Land register entries/databases Site surveys

		See also guidance for I1.1.1 above	Management plans Environmental assessments of expansions since 1st January 2008, showing no conversion of natural ecosystems (e.g. continuously forested areas, wetlands or cerrado) since 1st January 2008 or earlier. Verification that the scope of the environmental licenses (issued since 1st January 2008) does not include conversion of high carbon areas. Interviews with state Environmental Agencies' staff and other stakeholders.
	I.1.1.3 Evidence that biomass production has not caused direct land use change of peatlands on or after 1 January 2008.	Peatlands[1] are waterlogged accumulations of partially decayed vegetation matter[2]. This requirement will normally be demonstrated with evidence showing that there has been no land use change on land *that was peatland in* January 2008, unless evidence is provided that the cultivation and harvesting of the sugar cane does not involve drainage of previously undrained soil. It should be noted that it is unlikely that sugar cane is planted on peatlands in Brazil.	Evidence of compliance can take many forms, for example: Aerial photographs Satellite images Maps Land register entries/databases Site surveys Management plans Environmental assessments of expansions since 1st January 2008, showing no conversion of natural ecosystems (e.g. continuously forested areas, wetlands or cerrado) since 1st

[1] IPCC Good Practice Guidance for LULUCF (Chapter 2: Basis for Consistent Representation of Land Areas)
[2] Based on JRC definition - http://eusoils.jrc.ec.europa.eu/esdb_archive/octop/Peatland.html

			January 2008 or earlier. Verification that the scope of the environmental licenses (issued since 1st January 2008) does not include conversion of high carbon areas including peatlands. Interviews with state Environmental Agencies' staff and other stakeholders.
	I.1.1.4 Evidence that biomass production has not caused direct land use change of continuously forested areas on or after 1 January 2008.	Continuously forested areas is land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ, but does not include areas that are predominately under agricultural or urban use. Examples include the Amazon or fragments of the Mata Atlantica. This requirement will normally be demonstrated with evidence showing that there has been no land use change, e.g. 'positive' evidence showing the area was already cropland in 2008. Use of earlier evidence is also possible, for example, if it is shown that land was cropland a little earlier than 2008, e.g. in 2005, is also acceptable. See also guidance for I1.1.1 above	Evidence of compliance can take many forms, for example: Aerial photographs Satellite images Maps Land register entries/databases Site surveys Management plans Environmental assessments of expansions since 1st January 2008, showing no conversion of natural ecosystems (e.g. continuously forested areas, wetlands or cerrado) since 1st January 2008 or earlier. Verification that the scope of the environmental licenses (issued since 1st January 2008) does not include conversion of high carbon areas. Interviews with state Environmental Agencies' staff and other stakeholders.

Principle 2: BIODIVERSITY CONSERVATION: Biomass production will not lead to the destruction or damage of high biodiversity areas			
Criteria	**Indicators**	**General guidance**	**Means of verification**
C2.1 Compliance with national laws and regulations relevant to biomass production and in the area where biomass production takes place.	I2.1.1 No evidence of non-compliance with applicable national and local laws, decrees and regulations including: • Land ownership and land use rights • Forest and plantation management • Protected and gazetted areas • Nature and wild life conservation • Land use planning • National laws resulting from the adoption of CBD and CITES.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED. The most important law related to biodiversity conservation is the Forest Code (Law No 4.771, 15 September 1965), which includes requirements for legal reserves, and permanent preservation areas of riparian forests and slopes. Decree 6514/08 defines penalties and fees for lack of compliance. Decree 7014/09 (Summary attached) defines the step-by-step process via the “Mais Ambiente” Programme to comply with the law. In order for the land to be legalized, the company must agree a plan with the state environment agency for implementation, based on restoration 1/10 of the total area every 3 years, until the reserves are met. The company has also to sign the process agreement stated on the “Mais Ambiente” Programme. The penalties defined on the Decree 6514/08 will start to be applied in April 2012. Another relevant decree is the National Biodiversity Policy (Decree No. 4339/02), which is aligned with the articles and objectives of the Convention on Biological	Signed “Mais Ambiente” commitments agreement with state Environmental Agency. Documentation showing: a) that the location and extent of existent permanent preservation areas and legal reserves has been mapped. b) a plan is in place for the process of recovering, restoring or to maintain the Permanent Preservation Areas within a set timescale. c) a plan is in place to legalize/register (averbação) the Legal Reserve within a set timescale. d) figures indicating the legal reserve area (or planned area) will meet the Forest Code percentage requirements. Confirmation of the existence of permanent preservation areas and legal reserves in the field. Other licenses, legal documents, certificates provided by relevant legal bodies stating that there are no outstanding debts or infractions. Interviews with workers and other stakeholders with regards to

Principle 2: BIODIVERSITY CONSERVATION: Biomass production will not lead to the destruction or damage of high biodiversity areas			
Criteria	**Indicators**	**General guidance**	**Means of verification**
		Diversity. The Convention on International Trade in Endangered Species (CITES) requirements were legislated through the Presidential Decree 3607/0.	legal compliance.
	I2.1.2 Evidence that the organisation is: • familiar with relevant national and local legislation • is seeking to comply with the legislation • remains informed of changes in legislation.	The system adopted for managing compliance with the legal requirements should be appropriate to the production scale of the organisation.	Documented information on applicable legal requirements (this is expected of large-scale producers). Knowledge of the main legal requirements (as outlined in I2.1.1). Procedures and practices relating to legal compliance implemented in the field. System in place to incorporate changes to the legislation (for example this may include membership to an organisation that provides such updates or an environmental manager with this responsibility).
C2.2 No conversion of high biodiversity areas after 1 January 2008.	I2.2.1 Evidence that biomass production has not caused direct land use change of primary forest and other wooded land on	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED. Primary forest and other (primary) wooded land is forest and other wooded land of native species,	Evidence of compliance can take many forms, for example: Aerial photographs

[3] See http://www.biodiversityhotspots.org/xp/hotspots/atlantic_forest/Pages/default.aspx

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Criteria	**Indicators**	**General guidance**	**Means of verification**
	or after 1 January 2008.	where there is no clearly visible indication of human activity and the ecological processes are significantly disturbed. Environmental licensing is required for expansion, and includes an impact assessment by the Environment Agency. Conservation International had developed a Biodiversity HotSpot concept which includes many areas of Atalnatic Forest and Cerrado in Brazil[3]: This indicator applies irrespective of any changes in land ownership or farm management that have taken place on or after 1 January 2008. This requirement will normally be demonstrated with evidence showing that there has been no land use change, e.g. 'positive' evidence showing the area was already cropland in 2008. Use of earlier evidence is also possible, for example, if it is shown that land was cropland a little earlier than 2008, e.g. in 2005, this may be enough to show compliance with some or all of the land related criteria. Negative evidence, e.g. a map of all the primary forest and other (primary) wooded land in the	Satellite images Maps Land register entries/databases Site surveys Management plans Environmental assessments of expansions since 1st January 2008, showing no conversion of primary forest or other primary woodland since 1st January 2008 or earlier. Verification that the scope of the environmental licenses (issued since 1st January 2008) does not include conversion of. Interviews with state Environmental Agencies staff and other stakeholders.

Principle 2: BIODIVERSITY CONSERVATION: Biomass production will not lead to the destruction or damage of high biodiversity areas			
Criteria	**Indicators**	**General guidance**	**Means of verification**
		region, showing the land to fall outside them is also acceptable.	
	I2.2.2 Evidence that biomass production has not caused direct land use change of grassland on or after 1 January 2008.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED. Grasslands are land on which the vegetation is dominated by grass and grass-like plants for a period of at least 5 years[4]. This requirement will normally be met by demonstrating that no expansion of sugarcane has occurred since 2008, or that any sugarcane expansion has occurred on existing cropland (such as soy and pasture), or that expansion of sugarcane has occurred in areas which were not grasslands. This requirement will be updated to refer to 'highly biodiverse grasslands' once the definition is available from the EU.	Evidence of compliance can take many forms, for example: Aerial photographs Satellite images Maps Land register entries/databases Site surveys Management plans State's official floristic and biomes assessment studies Regional or national research institute's assessments and studies Conservation International Biodiversity HotSpot List Environmental assessments of expansions since 1st January 2008, showing no conversion of highly biodiverse grasslands since 1st January 2008 or earlier.

[4] JRC http://soco.jrc.ec.europa.eu/documents/Session2_Prosperi.pdf

Principle 2: BIODIVERSITY CONSERVATION: Biomass production will not lead to the destruction or damage of high biodiversity areas			
Criteria	**Indicators**	**General guidance**	**Means of verification**
			Interviews with state Environmental Agencies staff and other stakeholders.
	I2.2.3 Evidence that production does not take place in areas serving purposes of nature protection which are areas that have been designated, by law or by the competent authority, for purposes of nature protection.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED requirements. IBGE, the Brazilian Institute for Geography and Statistics, maintains a database of parks and reserves (biological, ecological, forestry and extractive)[5]. In some cases, production can be found within conservation units, which special dispensation from the competent authority. Reference UNESCO World heritage sites; IUCN List of Protected Areas categories I, II, III and IV, according to the list available from 2003 or more up to	Maps showing conservation units, in context with production areas. Documented permission for use in conservation units, where applicable.

[5] IBGE map of conservation units http://www.ibge.gov.br/brasil_em_sintese/territorio01.htm

[6] See http://www.biodiversityhotspots.org/xp/hotspots/cerrado/ Pages/default.aspx

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Criteria	**Indicators**	**General guidance**	**Means of verification**
		date national data; RAMSAR sites (wetlands under the Convention on Wetlands) according to the available list or more up to date lists or national data. Conservation International had developed a Biodiversity HotSpot concept which includes many areas of Cerrado[6]. This will normally be demonstrated using negative evidence, e.g. – a map of all the designated nature protection areas in the region, showing the land to fall outside them. A detailed list of protected areas will be included as soon as they are available from the EU as an Annex to the standard, and will be regularly updated as necessary.	
	I2.2.4 Evidence that production does not take place in high conservation value areas.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED requirements. High Conservation Value areas are critical areas in a landscape which need to be appropriately managed	Valid environmental license issued by Environment Agency. Documented evidence of an impact assessment for any expansion that has taken place since 30 November 2005. Documentation identifying where HCVs occur and the area required to maintain them, including areas owned but not under production.

Principle 2: BIODIVERSITY CONSERVATION: Biomass production will not lead to the destruction or damage of high biodiversity areas			
Criteria	**Indicators**	**General guidance**	**Means of verification**
		in order to maintain or enhance High Conservation Values[7]. High conservation value areas include: • HCV 1, 2, 3 relating to important ecosystems and species • HCV 4, relating to important ecosystem services, especially in vulnerable areas • HCV 5, 6, relating to community livelihoods and cultural values. HCV as a tool is not a well known concept in Brazil, and use of existing systems of identification for values may be used: At the National level, a survey by the Conservation and Sustainable-Use of the Brazilian Biological Diversity Project (Pro Bio, a GEF project) has identified important areas for biodiversity	Consultation with stakeholders (particularly CONAMA).

[7] The definition of the 6 High Conservation Values can be found at http://www.hcvnetwork.org
Currently no comprehensive maps exist which define HCV areas. For many areas it will therefore still be necessary to assess whether HCV's are present or not. The following initiatives are helpful in defining areas with one or more HCV's:
· Conservation International – Biodiversity Hotspots
· Birdlife international – Important Bird Areas
· The WWF G200 Ecoregions: the regions classified 'vulnerable' or 'critical/endangered'.
· European High Nature Value Farmland

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Criteria	**Indicators**	**General guidance**	**Means of verification**
		conservation. Ecological-Economical Zonings (EEZ) is undertaken at the State level to identify appropriate uses for areas (as set out in Decree No. 4297). The Environmental Agency CONAMA has defined sustainable use for natural resources, for application at a municipal level. This indicator applies irrespective of any changes in land ownership or farm management that have taken place after 1 January 2008. This will normally be demonstrated using negative evidence, e.g. – a map of all the high conservation value areas in the region, showing the land to fall outside them.	
C2.3 The status of rare, threatened or endangered species and high conservation value habitats, if any, that exist in the production site or that could be affected by it, shall be identified and their conservation taken	I2.3.1 Documentation of the status of rare, threatened or endangered species and high conservation value habitats in and around the production site.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED requirements. Key species likely to be at risk in sugarcane production are Jaguatirica, Ararinha Azul, Mico, Parrots, Macaws and Pau-Brasil. The Ministry of the Environment, IBAMA, and the Fundago Biodiversitas, maintain the Brazilian Official	Existence of up to date flora and fauna surveys, appropriate to the scale of production. Familiarity with IBAMA list of RTE species. Lists or maps identifying RTE species and high conservation value habitats in and around the production site (for small scale production, knowledge of these may be sufficient). States Ecological-Economical Zoning (EEZ) documents, where they where developed and implemented.

Principle 2: BIODIVERSITY CONSERVATION: Biomass production will not lead to the destruction or damage of high biodiversity areas			
Criteria	**Indicators**	**General guidance**	**Means of verification**
into account in management plans and operations.		List of Species Threatened with Extinction. See 2.2.4 for guidance on HCV.	Conservation International Biodiversity HotSpot List Documentation identifying where HCVs occur and the area required to maintain them, including areas owned but not under production. Consultation with stakeholders (particularly CONAMA).
	I2.3.2 Documented and implemented management plan including measures to avoid damage to or disturbance of the above mentioned species and habitats.	This is a minimum mandatory requirement. Failure to comply with this indicator will result in the production unit not meeting the requirements of the EU RED requirements. Environmental management plans are not required by law, but are a necessary part of compliance with the requirements.	Existence of documented plans or actions appropriate to species and habitats identified in 2.3.1, and confirmation of field implementation. For large companies (>1000 employees), an individual or team with designated responsibility for technical management of species and habitats. Interviews with workers that handle activities with high potential impact, to verify instructions they follow to carry out such activities.

Principle 3: SOIL CONSERVATION: Biomass production does not lead to soil degradation			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C3.1 Compliance with national laws and regulations relevant to soil	I3.1.1 No evidence of non-compliance with national and local laws and	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU	Valid operational license is available for the area of production (this includes an environment impact assessment). Agrochemicals are stored in a manner consistent with legal

Principle 3: SOIL CONSERVATION: Biomass production does not lead to soil degradation			
Criteria	**Indicators**	**Guidance**	**Means of verification**
degradation and soil management.	regulations with respect to: • Environmental Impact Assessment • Waste storage and handling • Pesticides and agro-chemicals • Fertilizer • Soil erosion	RED. Agrochemicals research, tests and trials, production, packing and descriptions, transport, storage, trading, marketing, use, imports and exports, residues final destination and packaging, registration, classification, control, inspection and inspection are regulated by the federal level, law 7802/89 and Decree No. 4074/02 . The Brazilian government maintains a list of banned agrochemicals, and compliance with the Stockholm convention is required. Container destination is covered by Decree No. 3.550/90. In the State of Sao Paulo, there is a law relating to soil conservation and preservation of agricultural soil (state law 6171/88 updated by law 11970/05). The state of São Paulo has a technical norm governing the field storage and application of vinasse (CETESB P4.231/05), based on the Forest Code.	requirements. Records of agrochemical use. Records (date, quantity/area and place) of the fertilizers and vinasse used. Receipts showing destination of used agrochemical containers are available. Signed receituário agrônomicos are available for all agricultural prescriptions.
	I3.1.2 Evidence that the organisation is:	The system adopted for managing compliance with the legal requirements should be appropriate to the	Documented information on applicable legal requirements (this is expected of large-scale producers).

Principle 3: SOIL CONSERVATION: Biomass production does not lead to soil degradation			
Criteria	**Indicators**	**Guidance**	**Means of verification**
	• familiar with relevant national and local legislation • is seeking to comply with the legislation • remains informed of changes in legislation	production scale of the organisation.	Knowledge of the main legal requirements (as outlined in I3.1.1). Procedures and practices relating to legal compliance implemented in the field. System in place to incorporate changes to the legislation (this may include for example membership to an organisation that provides such updates, or a person responsible within the company, e.g. the agronomist).
C3.2 Application of good agricultural practices with respect to: • Prevention and control of erosion • Maintaining and improving soil nutrient balance • Maintaining and improving soil organic matter • Maintaining and	I3.2.1 Documentation of soil management plan aimed at sustainable soil management, erosion prevention and erosion control.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Soil management plans are not required by law (except in Sao Paulo), however must be in place for compliance with the requirements. Key impacts of sugarcane production on soil may include compaction from heavy vehicles on fields, erosion in and around roads and on sloped planted areas and soil exhaustion from loss of nutrients.	Existence of a documented plan or actions for soil management. Records of regular soil analysis, including physical and chemical properties, e.g. N,P,K. Evidence that results of soil analysis have been incorporated into plans or actions. Maps of soil types, where available and practical (this may include references to regional soil databases). Field verification of erosion prevention activities and soil structure. Field observation of incidences of erosion and salinisation if appropriate.

Principle 3: SOIL CONSERVATION: Biomass production does not lead to soil degradation			
Criteria	**Indicators**	**Guidance**	**Means of verification**
improving soil pH • Maintaining and improving soil structure • Maintaining and improving soil biodiversity • Prevention of salinisation	I3.2.2 Documented operating procedures for good agricultural practices must be implemented and monitored with respect to: • Prevention and control of erosion • Maintaining soil fertility.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. There is a Classification System based on Soil Suitability for Use (as defined by the Brazilian Society of Soil Science) which agronomists can use. Contour planting of sugarcane is a method of soil conservation employed in hilly areas. Use of nitrogen-fixing legumes as a non-seasonal crop is also a technique used to increase nutrients and fertility, and minimise the amount of tillage. The state of São Paulo has a technical norm governing the field storage and application of vinasse (CETESB P4.231/05), based on the Forest Code., which serves as a useful guide for other States which do not have legislation relating to vinasse application.	Existence of documented operating procedures for soil. Field verification of erosion prevention techniques and activities maintaining soil fertility, consistent with operating procedures.

Principle 4: SUSTAINABLE WATER USE: Biomass production does not lead to the contamination or depletion of water sources			
Criteria	**Indicators**	**Guidance**	**Means of verification**

Principle 4: SUSTAINABLE WATER USE: Biomass production does not lead to the contamination or depletion of water sources			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C4.1 Compliance with national laws and regulations relevant to contamination and depletion of water sources.	I4.1.1 No evidence of non-compliance with relevant national and local laws and regulations including: • Environmental Impact Assessment • Waste storage and handling • Pesticides and agro-chemicals • Fertilizer • Irrigation and water usage.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The key law related to sustainable water use is the National Policy for Water Resources (Law No.9433/97), which is implemented through the National Water Agency. Any use of water (springs, reservoirs) for production must be officially licensed (outorga do uso de água) This is managed by river basin committees In terms of agrochemicals, there is an agrotoxic law at the federal level, law 7802/89 and Decree No. 4074/02 NR31, legislation which relates to workers, also has requirements for washing of equipment and clothing. IMPEV is an NGO which have programme to collect waste containers at a national level. The state of São Paulo has a law governing the application of vinasse (P4231 Jan 200 5), which includes permanent preservation areas and watercourses.	Valid license(s) for water use or in process to getting get license. Field verification that agrochemical application occurs as set out in the product labels (where available) e.g. distances from people housing/working, water reservoirs and water courses (including areas with seasonal flows), as set out in Decree 98.816. Field verification and documentation that the native vegetation along water courses (permanent preservation areas) are according to the Brazilian Forest Code (law 4.771).

Principle 4: SUSTAINABLE WATER USE: Biomass production does not lead to the contamination or depletion of water sources			
Criteria	**Indicators**	**Guidance**	**Means of verification**
	I4.1.2 Evidence that the organisation is: • familiar with relevant national and local legislation • is seeking to comply with the legislation • remains informed of changes in legislation.	The system adopted for managing compliance with the legal requirements should be appropriate to the production scale of the organisation.	Documented information on applicable legal requirements (this is expected of large-scale producers). Knowledge of the main legal requirements (as outlined in I4.1.1). Procedures and practices relating to legal compliance implemented in the field. System in place to incorporate changes to the legislation (this may include for example membership to an organisation that provides such updates, or a person responsible within the company, e.g. the agronomist).
C4.2 Application of good agricultural practices to reduce water usage and to maintain and improve water quality.	I4.2.1 Documentation of water management plan aimed at sustainable water use and prevention of water pollution.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Water management plans are not required by law but the producer needs to plan the amount of water that will be used to get the license (Outorga). Key impacts of sugarcane production on water may include contamination of the water table from vinasse or agrochemical run-off, poor control of water used for irrigation (wastage), and impacts associated with damming areas to create reservoirs for irrigation.	Existence of a documented plan or actions for water management (including irrigation and natural watercourses). Existence of a documented plan or actions for agrochemical management (including risk analysis and contamination plans). Records of regular water analysis. Evidence that results of water analysis have been incorporated into plans or actions. Field verification of sustainable water use and contamination prevention. Field observation of incidences of poor irrigation control and vinasse leaching.

Principle 4: SUSTAINABLE WATER USE: Biomass production does not lead to the contamination or depletion of water sources			
Criteria	**Indicators**	**Guidance**	**Means of verification**
		The Sao Paulo Environment Agency (CETESB) issues guidance and procedures for water management which are a useful example of good practice. It is important to note that whilst mills/industries use significant volumes of water, they are outside the scope of the verification. In cases where agrochemical labels do not specify buffer zones, field verification of application either 250m (when applied by plane) or >30m (when applied by tractor /manually) from water courses and housing/people working.	Interviews with adjacent communities and local stakeholders regarding well water or other sources under local use, and any contamination issues.
	I4.2.2 Documented operating procedures for good agricultural practices must be implemented and monitored with respect to: • Efficient water usage • Responsible use of agro-chemicals • Waste discharge	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The key areas which require operation procedures include agrochemical application, including aerial application (notably of glyphosate), waste water from cleaning equipment (including clothing), the application of vinasse to fields, use and maintenance of equipment for maintenance and application of agrochemicals and irrigation. Permanent Preservation Areas and legal reserves	Existence of documented operating procedures for water use and protection, including contamination procedures. Maps of river basins, watercourses (including seasonal) and riparian vegetation. Field verification of efficient water use techniques, responsible use of agro-chemicals and waste water, consistent with operating procedures. Records of agrochemical and fertilizer purchased (quantities acquired, the purchase dates, purpose of use etc.). Records of agrochemical, fertilizers and vinasse use (date,

Principle 4: SUSTAINABLE WATER USE: Biomass production does not lead to the contamination or depletion of water sources			
Criteria	**Indicators**	**Guidance**	**Means of verification**
		play an important part in sustainable water use (see Principle 2)	quantity and place).
	I4.2.3 Pests, diseases and weeds are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	This indicator was identified as being relevant to the criteria based on the premise that minimising use of pesticides will lower the risk of contamination of water. Alternative methods for the control of pests, diseases and invasive plants (mechanical, physical and biological) should be used where possible.	Documented plan or actions minimising chemical use through Integrated Pest Management Techniques. Qualified agronomic professional employed for implementation of pest management. Records of levels of chemical application (including commercial name and technical name). Field observation of pests. Documentation of crop losses due to infestation.
	I4.2.4 Justification for all chemical use must be documented, with no prophylactic use, and records of use maintained.	The Agriculture Ministry maintains a list of chemicals and their approved uses.	Documented agrochemical use plan or actions. Records of chemical use (fertilizers, pesticides, herbicides, etc.). System for decision making for when use of chemicals or biological agents is appropriate (e.g. infestation threshold). Lists or documentation of chemicals applied and their uses. Interviews with agronomic staff regarding chemical use. Evidence of justification for all agrochemical use.

Principle 5: AIR QUALITY: Biomass production does not lead to air pollution			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C5.1 Compliance with national laws and regulations relevant to air emissions and burning practices	I5.1.1 No evidence of non-compliance with national and local laws and regulations with respect to: • Environmental Impact Assessment • Air emissions • Waste management • Burning practices	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. There are a number of laws that refer to burning management, as well as specifically the reduction in burning associated with sugarcane harvest. At the Federal level, the Forest Code (Federal Law 4,771/65), regulated by the Decree 2661/98 (chapter 4, article 16) regulates the practice. it is stated that the burning for harvest of sugarcane should be decreased by ¼ of the mechanizable area (areas with declivity less than 12%) every 5 years, beginning in June 1998, and completed eliminated by June 2018 . In the State of Sao Paulo, areas with declivity less than 12%, burning for sugarcane harvest must be completely eliminated by 2021. In areas with declivity greater than 12%, burning must be completely eliminated by 2031 (law 11.241/02, Decree 49.446/05). There is also a voluntary Agro-environmental Protocol (Etanol Verde) in São Paulo state and similar ones in Minas Gerais and Paraná	Licenses to burn (applicable for the whole country). A documented fire management plan, consistent with the State requirements (in the State of Sao Paulo,Minas Gerais and Paraná only). Other States are discussing the implementation of similar requirements. Field verification of implementation of fire management plan. Documents showing burning decreasing practices by ¼ of the mechanizable area since June 1988. Where available, local records of air pollution. Interviews with workers and stakeholders regarding air pollution.

Principle 5: AIR QUALITY: Biomass production does not lead to air pollution			
Criteria	**Indicators**	**Guidance**	**Means of verification**
		states which requires: • Areas with declivity less than 12%: by 2010, 70% of the area must not be burned, and stopped completely by 2014 • Areas with declivity more than 12%: by 2010, 30% of the area must not be burned, and stopped completely by 2017 • No burning in harvest in expansion areas • Action to avoid burning of waste (State Law 11.241/02, Decree 47.700/03, 48.894/04, 49.391/05 and 49.446/05) In some cases there are also State and local laws and regulations relating to restricting burning hours (e.g. night-time only). There is federal legislation relating to the allowable pollution concentrations in cities and urban areas. However, this is not linked directly to the sources of pollution, as it represents an aggregation of all sources in the area and thus cannot be used as a direct verifier.	

Principle 5: AIR QUALITY: Biomass production does not lead to air pollution			
Criteria	**Indicators**	**Guidance**	**Means of verification**
	I5.1.2 Evidence that the organisation is: • familiar with relevant national and local legislation • is seeking to comply with the legislation • remains informed of changes in legislation	The system adopted for managing compliance with the legal requirements should be appropriate to the production scale of the organisation.	Documented information on applicable legal requirements where they exist (this is expected of large-scale producers). Knowledge of the main legal requirements (as outlined in I5.1.1). Procedures and practices relating to legal compliance implemented in the field. System in place to incorporate changes to the legislation (this may include for example membership to an organisation that provides such updates, or a person responsible within the company, e.g. the agronomist).
C5.2 No burning as part of land clearing or waste disposal.	I5.2.1 Evidence that no burning occurs as part of land clearing or waste disposal.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. There are laws about the disposal of waste by incineration, covered under C5.1.	In cases of recent or planned expansion, evidence that burning will not be used: Documentation (environmental licenses or other official documentation indicating scope of expansion). Interviews with managers, workers and stakeholders regarding recent and planned expansion and land clearing.
	I5.2.2 For burning as part of sugarcane harvesting, a long-term plan is in place to minimise burning.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED.	Documented long-term management plan to end burning as a widespread harvesting mechanism, incorporating mitigation of potential impacts (including on the workforce, in terms of job losses),.

Principle 5: AIR QUALITY: Biomass production does not lead to air pollution			
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		Besides the Federal law, Sao Paulo, Minas Gerais and Paraná states have regulations and voluntary protocols targeting the end of burning, as described on Guidance for I5.1.1 above. Manual harvest is possible without burning however the yields are much lower. It is therefore expected that reduction in burning will mean an increase in mechanisation, which may have serious social impacts in terms of widespread job losses. In some cases, burning and mechanisation are used in tandem to increase yields, a practice which is not recommended.	Signed agreement for the voluntary Agro-environmental Protocol (Etanol Verde) and certificate of compliance if applicable. Technical justification is provided where there burning followed by mechanized harvest.

Principle 6: WORKERS RIGHTS AND WORKING RELATIONSHIPS: Biomass production does not adversely affect workers' rights and working relationships			
Note on application of these criteria: all requirements apply equally to directly employed workers, contractors and subcontractors. Where part of the workforce is provided by contractors (and subcontractors) they are subject to the same requirements as the company's own workforce. This must be checked as part of the audit[8].			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C6.1 Compliance with national law on working conditions and workers rights.	I6.1.1 No evidence of non-compliance with applicable national and local laws and regulations	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The labour laws are consolidated under a piece of legislation called CLT. This includes NR31 and MP 410. There are also state-specific laws relating to contractors, employees and workers. Workers' cooperatives frequently mask poor working conditions, and use of 3rd party service providers or out-growers presents a risk for non-compliance if the company does not have monitoring and control over compliance with legislation with those 3rd parties.	Verification of contracts for workers. Field verification and interviews with workers. The Labour Ministry's list of companies with slavery offences[9]. List of workers registered in the "INSS" (*Social Security System*). "FGTS" (*Fund for Job Period*) tax documentations that show the numbers/quantity of registered workers and the amount of money that the company paid to this social tax.

[9] The list can be found online at www.mte.gov.br/trab_escravo/cadastro_trab_escravo.asp

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Criteria	**Indicators**	**Guidance**	**Means of verification**
	I6.1.2 Evidence that the organisation is: • familiar with relevant national and local legislation • is seeking to comply with the legislation • remains informed of changes in legislation	The system adopted for managing compliance with the legal requirements should be appropriate to the production scale of the organisation.	Documented information on applicable legal requirements (this is expected of large-scale producers). Knowledge of the main legal requirements (as outlined in I6.1.1). Procedures and practices relating to legal compliance implemented in the field. System in place to incorporate changes to the legislation (this may include for example membership to an organisation that provides such updates, or a person responsible within the company).
C6.2 All workers have a legal contract.	I6.2.1 Workers' contracts are consistent with all applicable requirements in Principle 6.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED.	Verification of existence of contracts for workers. Interviews with employees and contractors.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
C6.3 All workers are adequately informed of their rights.	I6.3.1 Evidence that the organisation has effectively informed workers of all applicable rights as covered in Principle 6	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. It must be ensured that the means of communicating the rights are appropriate, for example, if many employees don't understand, then maybe there is a problem with the way the information is presented (for example, written information when there are high levels of illiteracy).	Workers are found to be aware of their rights in practice. Records of communication. Evidence that the method of communication is appropriate (e.g. comprehension by workers, discussion with unions, relevant stakeholders etc). Existence of documents. Confirmation from unions that workers are aware of their rights.
C6.4 All workers have the right to organise and negotiate their working conditions	I6.4.1 The right to organise should be consistent with that established in ILO Conventions 87 and 98.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. In Brazil, there is no competition between unions. The option for employees is either to be associated or not to be. There are cases where there are agreements between the union and the company, which may not benefit employees and may infringe their right to	Evidence of union membership by employees. Interviews with workers and unions.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
		freely organise. It should be noted that unions in Brazil are conceptualised different than in the ILO conventions, and for this reason Brazil has not signed all ILO conventions related to labour.	
	I6.4.2 Workers exercising this right should be free from discrimination or other adverse consequences.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. This is very difficult to identify because workers are unlikely to discuss this, as it may put them at risk of discrimination themselves.	Interviews with workers and unions.
C6.5 No children may be employed except for family members working on family farms where this is consistent with their well-being.	I6.5.1 No evidence of children under 16 working other than as apprentices or on family farms.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Children between the ages of 14 and 16 can be hired as apprentices, provided they have permission for a parent or guardian, attend school, work part time and	System in place to check the ages. Field verification and interviews with workers. For third party suppliers, a system in place to ensure this requirement is being met.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
		do not work under hazardous conditions. For out-growers, the company must provide some means of assurance that this requirement is being met, e.g. contractual requirements or monitoring.	
	I6.5.2 Evidence that children working on family farms are family members.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Family farms are likely to contribute to production as out-growers, in which case the company must provide some means of assurance that this requirement is being met.	For third party suppliers, a system in place to ensure this requirement is being met. Interviews with the family farmers and their children.
	I6.5.3 Evidence that if children are working on family farms the work does not interfere with their educational, moral, social or physical development and the work day inclusive of school and transport should not	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Children spend usually 3-4 hrs at school, which should be factored in when calculating how much time they can spend working.	Confirmation of hours spent at school. Field verification that children are not harvesting, handling chemicals, heavy machinery, or working at night. Distance to school and form of transport.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
	exceed 10 hours.		
C6.6 Young workers may only be employed if national law allows and shall only undertake appropriate work	I6.6.1 No evidence that apprentices, aged 14-16, or young workers, aged 16 - 18 undertake hazardous or dangerous work.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The law allows children between the ages of 14-16 to work as apprentices.	Field verification that young workers are not harvesting, handling chemicals, heavy machinery, or working at night. Interviews with young workers. Confirmation of hours spent at school.
	I6.6.2 No evidence that young workers undertake work which may jeopardise their educational, moral, social and physical development.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Industry apprentices are required to be enrolled in an associated education programme. Attendance at school by young workers is not mandatory for rural workers.	Field verification and documentation of injuries and health problems associated with work. Interviews related to educational issues. Company documentation and procedures related to apprentices' educational programmes.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
C6.7 There is adequate protection of the health and safety of all workers.	I6.7.1 All workers receive regular and adequate health and safety training appropriate to the work that they perform.	Workers are well provisioned for under the law, though this does not necessarily mean the requirements will be implemented in practice. Federal Law 6,514/77 is the primary instrument governing occupational health and safety standards. The Ministry of Labour has issued NRs – Normas Regulamentadoras. Most of minimum requirements are set out in NR31, the legislation relating to workers and NR 7, *Programa de Controle Medico e Saude ocupacional* (107.000-2) for occupational health and safety. In particular, training must be provided for workers that apply, handle, transport or come into contact with agrochemicals or other chemical substances and who operate machinery.	Training materials and records. Field verification (equipment use, harvesting technique etc.) for consistency with training. Interviews with workers.
	I6.7.2 Workers' basic requirements are met including potable drinking water, adequate toilet facilities, a clean place to eat, adequate protective equipment and access to	Guidance as above in 6.7.1.	Field verification of field facilities and accommodation Interviews with medical staff, workers

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Criteria	**Indicators**	**Guidance**	**Means of verification**
	adequate and accessible (physically and financially) medical care. Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.		

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Criteria	**Indicators**	**Guidance**	**Means of verification**
	I6.7.3 Hazards are identified and workers informed and adopt preventive measures to minimise risks. Records of accidents are maintained.	The key hazards associated with sugarcane production are accidents associated with harvesting, worker transportation, fire, poisonous animals, and overwork. Inhalation of particles from burning during the harvest may also cause health problems (see criteria 5). NR 05 and Article 163 of the Consolidation of Labor Laws (CLT) requires that every company must create and operate an Internal Accident Prevention Commission (CIPA). NR 07 and 09, respectively, define requirements for the Workers Health and Medical Program (PCMSO) and the Environmental Risks Prevention Program (PPRA).	Procedures are in place to prevent and minimise risks. Records of accidents. Interviews with workers related to emergency information and logistics in case of emergency.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
C6.8 All workers must be paid fair and regular wages.	I6.8.1 Wages must be at least equivalent to the Brazilian national minimum wage or the industry standard, whichever is higher.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The minimum Brazilian wage is currently R$415.00, however wages may be higher in some regions. Transportation hours must be paid, as required by the law.	Monthly payment slips/salary receipt Interviews with human resources staff and workers. Verification of the minimum rural salary with the regional rural employers´ union ("sindicato rural") for both the harvest period and the normal period. This should also be officially documented by the company.
	I6.8.2 Workers must be paid in cash, or in a form that is convenient to them and regularly.	If they are paid with cheques they must have a half day off to allow deposit. Debit cards are also used as a means of paying employees.	Interviews with workers. Company Payment documents
	I6.8.3 Housing and other benefits are not automatically deducted from wages as an in-kind payment.	This is covered by National and State legislation. Federal Law 5,889/73 allows a deduction from the salary of up to 20% to cover accommodation and a deduction from the salary of up to 25% to cover meals (If previously authorized and agreed by the worker)	Interviews with human resources and workers.

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Criteria	**Indicators**	**Guidance**	**Means of verification**
	I6.8.4 Where workers operate on the basis of piecework, the pay rates must allow wages consistent with I6.8.1 to be earned during normal working hours and allocated in a transparent way.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. For harvesting undertaken by the company's own employees, there is usually a system involving measuring the bushels of cane harvested, based on piecework. There have occasionally been complaints that this is not done fairly. For cane delivered on a supply contract, payment is usually based on the weight and quality of the delivery.	Documentation or electronic systems demonstrating how payment is allocated for piecework. Monthly payment slips/salary receipt showing employees are receiving at least the minimum Brazilian wage (currently R$415.00). Verification of the minimum rural salary with the regional rural employers´ union ("sindicato rural") for both the harvest period and the normal period. This should also be officially documented by the company. Documents showing regular scale calibration (for supply contracts). Interviews with workers regarding payment calculations.
C6.9 In accordance with ILO Conventions 100 and 111, there is no discrimination (distinction, exclusion, or preference) practised that denies or impairs equality of opportunity, conditions, or	I6.9.1 No evidence of discrimination based on individual characteristics and group membership or association like: Race, Caste, National Origin, Religion, Disability, Gender, Sexual	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Women, indigenous people and Quilombolas are most at risk in terms of discrimination. Contracts with indigenous people must be dealt with	Documented company polices and procedures related to employment. Interviews with workers. Interviews with union, churches, family members, NGOs. Local FUNAI Office checks

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Criteria	**Indicators**	**Guidance**	**Means of verification**
treatment.	Orientation, Union Membership, Political Affiliation, Age, marital status and those with HIV/AIDS, seasonal, migrant and temporary workers	through FUNAI. This criteria is difficult to verify in practice, as discussion of incidents may result in future discrimination against the interviewee.	
C6.10 There is no forced labour including bonded labour as defined by ILO conventions 29 and 105.	I6.10.1 No evidence that any part of workers' salary, benefits, property, or documents are retained in order to force workers to remain on the farm.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. There have been cases where sugarcane workers have been found to be under forced or bonded labour, based on debts owed. The debts are likely to be related to transportation, food and housing.	Records of visits by Labour Ministry Interviews with workers. Interviews with stakeholders churches, NGOs etc. Verification of past Labour Ministry findings. The Labour Ministry's list of companies with slavery offences (See I6.1.1)
	I6.10.2 No evidence of any form of physical or psychological measure requiring workers to remain employed on the farm.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The salary of the foreman or field leader normally depends on the production of the harvesters' in his	Interviews with workers. Verification of past Labour Ministry findings. Records of visits by Labour Ministry

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Criteria	**Indicators**	**Guidance**	**Means of verification**
		team. It may be the case that it is in their interest to retain harvesters or increase their production.	
	I6.10.3 Spouses and children of contracted workers are not required to work on the farm.	This is not considered to be an issue in Brazil.	Interviews with human resources staff, workers. Documented policies and procedures.

Principle 7: LAND RIGHTS AND COMMUNITY RELATIONS: Biomass production does not adversely affect existing land rights and community relations			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C7.1 The right to use the land can be demonstrated and does not diminish the legal or customary rights of other users and respects important areas for local people.	I7.1.1 Documents showing legal ownership or lease must be available.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Alcohol producers will often use a combination of production from land they own, land they have leased and cane purchased from out-growers. Leases and contracts with out-growers may include technical assistance, supply of sugarcane plants and other production inputs or simply be a supply contract. Verbal contracts are valid under law, however disagreements arising regarding verbal contracts can only be measured and tried by evidence admitted by law. Land title should be officially registered, otherwise parties are at risk of losing their land.	Documentation demonstrating legal ownership, e.g. official Government registry of land ownership, agreement of sake between two parties. Evidence of payment of taxes. Documentation of lease agreements. Verbal contracts are not sufficient for leases. Documentation of out-grower agreements. Where oral contracts exist, interviews with land owners.
	I7.1.2 Identification of recognised legal and customary rights.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. It is very rare to find any issues between Sugar Cane Mills in Brazil and traditional and/or customary	Documents showing what type of communities are established in the areas affected by production. Documented management plans or actions incorporating legal and customary rights, including local communities. Maps showing extent of recognised legal and customary rights

Principle 7: LAND RIGHTS AND COMMUNITY RELATIONS: Biomass production does not adversely affect existing land rights and community relations			
Criteria	**Indicators**	**Guidance**	**Means of verification**
		communities like indigenous or quilombolas. As most of the mills in Brazil had being established in areas used by sugarcane plantations or other extensive agriculture production more than 30 years ago near industrialized areas, the local population live mostly in urban small cities and villages. But the key legal and customary rights likely to be an issue in Brazil are land claims and access rights by Quilombolas and Indigenous people, communal access by Babaçu collectors and other community access issues (e.g. fishing, hunting, recreation, etc.). The auditors should assess if any issue has being raised in the region. One important issue that needs to be assessed also is if any claims or invasions from MST (No Land Movement) occurred and has being treated fairly and through legal procedures.	if applicable. Cross-check existing applications for land claims with company documentation.
	I7.1.3 Evidence of negotiated agreements and discussions with local people must be available.	Surrounding communities directly affected by production activities, as well as those within the watershed should be considered. Negotiated agreements can include formal Government agreements with indigenous or Quilombola peoples.	Documentation of meetings, communication and stakeholder consultation undertaken by the company. Documented agreements, where applicable. Interviews with stakeholders.

Principle 7: LAND RIGHTS AND COMMUNITY RELATIONS: Biomass production does not adversely affect existing land rights and community relations			
Criteria	**Indicators**	**Guidance**	**Means of verification**
C7.2 Procedures are in place to consult and communicate with local populations and interest groups on plans and activities that may negatively affect the legal or customary rights, property, resources, or livelihoods of local peoples.	I7.2.1 Policies and procedures for consultation and communication must be documented.	The main types of consultation are public audiences as advertised in newspapers, on the radio, and through the Church. There is a project currently under development to incorporate social responsibility into legislation, which should be incorporated if it is formalised.	Documented company policies and procedures relating to consultation and communication. Procedures and policies include requirement that decisions have been made based on communication and consultation (or evidence of this in practice). Documentation of audiences, and other types of community consultation Large companies have a person responsible to deal with communities (>1000 workers), community (corporate) relations post. Interviews with stakeholders.
	I7.2.2 Lists of local communities and other interest groups, records of consultation and communication, and records of actions taken as a result of input from interest groups, must be maintained, appropriate to scale.	The system adopted for managing records should be appropriate to the production scale of the organisation.	The verifiers are the same as the indicator.

Principle 7: LAND RIGHTS AND COMMUNITY RELATIONS: Biomass production does not adversely affect existing land rights and community relations			
Criteria	**Indicators**	**Guidance**	**Means of verification**
	I 7.2.3 Potential impacts on legal or customary rights, property, resources, or livelihoods of local peoples are identified.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. The activities most likely to impact legal or customary rights are roads, expansion into new areas, water usage (dams), use of agrochemicals, wastewater disposal (from production), and community access natural resources (fruit, water, hunting, fishing, natural fibres (river vegetation, palms, grasses, taboa). The social impact assessment should be appropriate to the production scale of the organisation.	Documentation of Social Impact Assessment (for small scale production, knowledge of impacts may be sufficient).
	I7.2.4 Plans are in place to manage potential impacts on legal or customary rights, property, resources, or livelihoods of local peoples.	This is a minimum reporting requirement. Failure to comply with this indicator will result in the production unit not meeting the reporting requirements of the EU RED. Company community programs, where they exist, must be consistent with impacts identified.	Documentation of plans or actions in place to manage potential social impacts. Field verification of community activities. Interviews with stakeholders.