	Habib Sugar Mills Limited Nawabshah - Pakistan	Document #	PLY-ChoC-0001
		Revision #	00
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Purpose

HSML is committed to implementing a transparent, accountable, and sustainable Chain of Custody (CoC) system for sugarcane, sugar, molasses, and ethanol. We prioritize traceability and the accurate application of the **Mass Balance System (MBS)** to maintain sustainability claims. This policy is designed to meet the requirements of Bonsucro Chain of Custody (ChoC) Version 5.1 standards, engaging personnel, suppliers, clients, and other stakeholders in ethical and sustainable practices.

Scope

This policy applies to all operations at HSML, including:

- Procurement of sugarcane from certified and non-certified suppliers.
- Processing of sugar, molasses, and ethanol, ensuring compliance with mass balance principles.
- Distribution of certified and non-certified products, while maintaining accurate traceability.
- Collaboration with personnel, suppliers, clients, and other stakeholders to uphold sustainability standards.

Objectives

1. Achieve full compliance with Bonsucro Chain of Custody Version 5.1 standards.
2. Maintain accurate **mass balance calculations** to ensure that certified input and output volumes are reconciled.
3. Enhance traceability throughout the supply chain.
4. Foster stakeholder collaboration to meet sustainability goals.
5. Ensure transparency and integrity in all product claims regarding certification.


Roles and Responsibilities of Stakeholders

1. Personnel

- Implement and adhere to CoC practices, including mass balance tracking.
- Participate in training on Bonsucro standards, mass balance, and traceability requirements.
- Ensure accurate documentation of material flows, including certified and non-certified volumes.

2. Suppliers

- Provide raw materials (sugarcane, sugar, molasses) that comply with Bonsucro standards, supporting **mass balance calculations** for certified and non-certified materials.
- Maintain segregation of certified and non-certified materials during storage and transport, where required.
- Cooperate in audits and assessments to verify compliance.

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3. Clients

- Specify certification requirements (e.g., Bonsucro-certified ethanol) and respect product handling guidelines.
- Accept and use products responsibly, adhering to certification claims supported by HSML's mass balance system.
- Request traceability documentation when needed.

4. Other Stakeholders

- **Logistics Providers:** Ensure secure transport of certified and non-certified materials with proper documentation for mass balance reconciliation.
- **Certification Bodies:** Conduct third-party audits to verify mass balance compliance and traceability.
- **Regulators:** Ensure HSML operations comply with national and international sustainability regulations.

Chain of Custody Requirements

1. Material Identification and Documentation

- All incoming and outgoing materials (sugarcane, sugar, molasses, ethanol) must be documented with unique identifiers (e.g., batch numbers).
- Certified materials must be recorded separately from non-certified materials to facilitate accurate mass balance calculations.


2. Traceability and Mass Balance

- Implement a robust traceability system to track the flow of materials through all stages of production and distribution.
- Adopt a **Mass Balance System (MBS)** that reconciles the input and output of certified materials over a defined period.
 - Certified materials entering the system will be monitored to ensure that claims for certified products are backed by sufficient certified inputs.
 - Regular reconciliation of mass balance records ensures that certified product claims are accurate and compliant.
- Conduct mass balance audits periodically to verify compliance with Bonsucro requirements.

3. Segregation (If Applicable)

- When mass balance principles allow for physical mixing, ensure accurate record-keeping and documentation.
- If segregation is required, implement physical and administrative controls to prevent cross-contamination between certified and non-certified materials.

4. Claims and Communication

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- Ensure all product claims regarding Bonsucro certification are supported by verifiable data from the mass balance system.
- Accurately label certified products and communicate their status transparently to clients and regulators.

5. Record-Keeping and Reporting

- Maintain accurate records of:
 - Supplier certifications.
 - Mass balance reconciliations.
 - Production and processing data for certified and non-certified materials.
 - Transportation and delivery documentation.
- Retain records for at least 5 years or as required by Bonsucro and regulatory standards.

Monitoring, Auditing, and Continuous Improvement

1. Internal Monitoring

- Regularly monitor the mass balance system to ensure compliance and accuracy.
- Conduct internal audits to evaluate traceability and adherence to Bonsucro CoC requirements.

2. External Audits

- Facilitate audits by Bonsucro-accredited certification bodies to verify compliance, including mass balance practices.
- Address non-conformities promptly with documented corrective actions.

3. Continuous Improvement

- Engage personnel, suppliers, and clients in refining traceability and mass balance systems.
- Invest in technologies and processes to enhance data accuracy and sustainability performance.

Transparent Commitment

HSML is dedicated to:

1. Maintaining a transparent and efficient mass balance system to ensure accurate certification claims.
2. Promoting sustainability and ethical practices throughout the supply chain.
3. Collaborating with stakeholders to foster shared accountability and continuous improvement.

Governance and Accountability



Habib Sugar Mills Limited
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- **Economic Operator (Mr. Israr Jafferi):** Oversees the implementation of the CoC system, including the mass balance system.
- **Management Team:** Responsible for ensuring all stakeholders comply with CoC policies and supporting mass balance audits.
- **Personnel:** Ensure compliance with traceability, segregation, and mass balance requirements in daily operations.

Policy Review and Approval

This policy is reviewed annually and updated to reflect changes in Bonsucro ChoC Standard.


Prepared by
Manager HSE


Reviewed by
Director Production
(M.R & BSTL)


Approved by
Resident Director

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Reviewed by			Review Date	Remarks	Next Review Date
Manager HSE	Director Production (M.R & BSTL)	Resident Director			