

Learning Paper: Human Rights Due Diligence toolkit for sugarcane mills

Time	April 2023 – November 2025
Theme	Human Rights and decent work
Project Lead	Proforest
Co-leads	Imaflora, Nestlé, General Mills, Barry Callebaut, The Hershey Company and ASR Group
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1. The Project

Brazil is one of the **world’s largest sugarcane-producing countries and is regularly identified in global risk assessments as a high or very high-risk context for human rights issues**¹. However, there remains **limited practical guidance available in Portuguese to support companies in implementing Human Rights Due Diligence (HRDD)**. The country’s two main sugarcane-producing regions—the Southeast and the Northeast—operate under markedly different production systems, organisational structures, and labour conditions, offering an opportunity to test and adapt HRDD tools to varied contexts. While the Southeast is now almost fully- mechanised, with São Paulo reaching over 99% mechanical harvesting in 2022², the Northeast has historically relied more on manual labour, with nearly 90% of harvesting still done by hand as recently as 2015 due to steeper terrain and greater labour availability³.

Building on these regional differences and the broader need for clearer, practical guidance on Human Rights Due Diligence (HRDD) in Brazil’s sugarcane sector, **the project aimed to establish a systematic approach for integrating HRDD into mills’ operations and across their supply chains**. Through a collaborative process and strong stakeholder engagement, the initiative developed a tailored toolkit, created practical implementation tools, and provided capacity-building support to mills, producers, and service providers. By piloting this framework with selected mills, the project wanted to generate actionable, context-specific guidance and ultimately build a sector-wide reference point for strengthening respect for human rights across Brazil’s sugarcane industry, with potential for broader application in the future.

2. Results

The project resulted in the creation of a **fully accessible online Human Rights Due Diligence (HRDD) Toolkit**, comprising a dedicated website⁴, six briefing notes, and four practical tools:

¹ [Child labour in the primary production of sugarcane](#), May 2017, [Brazilian plantations accused of forced labor supply Europe with sugar \(lemonde.fr\)](#)

² [Union of the Sugarcane Industry \(UNICA\). Agroenvironmental Protocol ‘Green Ethanol’ completes 15 years. \(2022\)](#)

³ [National Supply Company \(Conab\). Profile of the Sugar and Ethanol Sector in Brazil – Edition for the 2014-2015 harvest \(2017\)](#)

⁴ Website ongoing since 2024, with budget secured through 2028.

stakeholder engagement guidance, a risk saliency prioritisation matrix, a root cause analysis tool, and an action planning template. All materials were co-developed through extensive consultation with a diverse group of stakeholders, including three mills, four civil society organisations (CSOs), four suppliers, and subject matter experts. This collaborative approach ensured that the outputs are both highly relevant to industry needs and practical for real-world application. These resources provide practical guidance to help companies identify real and potential human rights impacts within their supply base and strengthen their ability to address worker rights and broader social issues across sugarcane production and processing—such as working conditions, recruitment practices, adequate pay, fundamental human rights, child and forced labour, gender equality, discrimination and harassment, and conflicts involving local communities.

Additionally, the project delivered a **comprehensive capacity-building component**, combining intensive in-person and online training sessions across Brazil's Northeast (NE) and Southeast (SE) regions, **strengthening the capacity of staff from three participating mills and other stakeholders to carry out Human Rights Due Diligence (HRDD) assessments**. As a result of this training, all three mills successfully applied the core HRDD steps⁵ and developed seven approved Action Plans with clear KPIs, providing practical demonstrations of how HRDD can be integrated into existing management systems such as supplier monitoring.

Training outcomes showed strong improvements in knowledge and confidence, 87.36% of participating staff reported feeling more capable of implementing HRDD, 97.37% learned a new method for assessing salient human rights issues, and 97% of internal feedback from directors and focal points confirmed a shift from viewing human rights as simple compliance to embracing HRDD as a systemic, cross-departmental responsibility. The remaining 3% noted areas that would benefit from further deepening, indicating a clear pathway for continued capacity-building efforts.

3. Lessons Learned

The project demonstrated the effectiveness of a structured HRDD approach and showed strong potential for long-term impact, but it also revealed some operational and engagement challenges that shaped important lessons. **Securing and sustaining mill engagement emerged as one of the most significant challenges**, largely due to their demanding operational and harvest cycles, certification pressures, and differing levels of HRDD maturity. These constraints often led to delays in data submission, limited availability for workshops, and slower-than-expected alignment on project steps. Additionally, the first round of workshops revealed that **external stakeholders were not fully familiar with HRDD concepts, and mills were cautious about openly discussing their risks in multi-stakeholder spaces**. These

⁵ This includes: (i) policy implementation and review; (ii) risk assessment and prioritisation; and (iii) an action plan to address prioritised risks, including remediation, communication, and monitoring activities not covered during the workshops

dynamics underscored the need for earlier coordination, clearer value propositions, and differentiated engagement approaches tailored to the readiness of each group involved.

Another major learning area related to the design and timing of activities. The project showed that **proactive scheduling and flexible programme design** are essential when working with mills that operate under strict calendar cycles. Planning consultations, workshops, and in-field activities far in advance—and outside peak periods—would have reduced delays and improved participation. The experience also highlighted the importance of **more frequent in-person engagement early in the process to accelerate understanding of supply-chain configurations and contextual challenges**. This would have helped identify key actors, HRDD gaps, and risk drivers faster, reducing long pauses between activities. Furthermore, the project revealed that separate awareness-raising activities for external stakeholders before joint sessions with mills would strengthen participation, reduce resistance, and ensure all actors shared a common understanding of HRDD expectations.

On the other hand, effective HRDD implementation depends on collective action across the sector. Mills cannot address systemic labour and human rights risks—particularly those involving service providers suppliers—without clear alignment and support from buyers, end users, and other value-chain actors. The experience showed that buyer engagement is especially influential, as mills are more likely to commit when purchasing companies communicate expectations, business incentives, and compliance requirements. The project also highlighted the importance of conducting early assessments of HRDD maturity, supply chain dynamics, competitiveness, and regulatory pressures to tailor approaches to local realities. Strengthening these elements is essential for breaking cycles of human rights risks, improving accountability, and enabling sustainable, long-term sector change.

Finally, a **key lesson from implementation was the central value of a well-structured, multi-stakeholder consortium with clearly defined and complementary roles**. The project's success relied on coordinated contributions: **Proforest and Imaflora** provided programme leadership, M&E oversight, toolkit development, and capacity-building activities across the Northeast and Southeast regions; **buyers and funders** (Bonsucro, Nestlé, General Mills, Barry Callebaut, The Hershey Company and ASR Group) ensured financial sustainability and used their market influence to support mill engagement; **mills** validated the approach by participating in consultations and integrating the HRDD model into their internal systems, **resulting in seven approved Action Plans**; and **local stakeholders** helped ensure contextual accuracy by identifying salient risks and validating methodologies. This collaboration demonstrated that technical quality, contextual relevance, and financial stability are maximised when responsibilities are strategically shared among diverse partners.

4. Recommendations for Future Projects

Future projects should adopt a more flexible, strategic, and scalable approach that supports both strong mill engagement and broader replication of the HRDD model. Early

onboarding proved challenging—only four out of ten mills agreed to participate, and one later withdrew due to limited internal capacity—underscoring the need for a structured mill-engagement strategy. Upcoming initiatives should plan for substantial scheduling flexibility and proactively schedule high-demand activities, such as workshops and field visits, during mills’ low-season periods with at least three to four months of lead time. Consistently communicating concrete benefits—such as reduced human rights risks and strengthened market access—will also help mills justify dedicating staff time, even during peak operational periods.

It is necessary to build on this positive experience by maintaining and reinforcing a multi-stakeholder governance structure that brings together technical implementers, buyers, mills, and local actors. Clearly defined roles and shared accountability will be essential to sustaining both implementation quality and mill engagement in new contexts. Buyers and funders should continue driving participation through financial support and market signals, while implementers lead the technical delivery and ensure tools remain sectors specific and practical. Local stakeholders should be embedded early in the process to guarantee contextual relevance and legitimacy. Replicating this collaborative model in future countries and regions—particularly where supply chain visibility and human rights risks remain high—will help ensure that HRDD methodologies are effectively adopted, scalable, and responsive to local realities.

At the same time, **future initiatives should focus on strengthening and scaling the validated HRDD Toolkit and Action Planning methodology developed in Brazil.** Expansion efforts must adapt the Toolkit for suppliers and service providers, ensuring supply chain co-responsibility challenges are effectively addressed. Building on results and lessons learned from this project, **Bonsucro**, through the South America team, **will strengthen the capacities of selected sugarcane mills and farmers’ associations in Northeast Brazil to better identify and address human rights risks.** The project will promote the use of the HRDD Toolkit developed by Proforest and provide training on risk identification, corrective actions, and self-assessment tools from the RESAFRA project⁶. The focus on Northeast Brazil responds to earlier assessments showing this region faces the most significant human rights risks. In its first year, the project will work with two mills and one farmers’ association. This initiative also represents a strong example of **replication and integration of results from two BIF projects**, bringing together tools, methodologies, and lessons learned to expand impact and strengthen human rights due diligence across the sugarcane sector.

⁶ The RESAFRA Programme aims to ensure the protection of human rights and decent working conditions for rural workers hired by sugarcane producers through subcontracting companies.



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