Joining the Initiative for Responsible Carnauba

Information for local supplier and processing companies

The members of the Initiative for Responsible Carnauba are encouraging Brazilian suppliers to adopt the approaches developed by the Initiative as a first and important step to improvement.

Carnauba wax suppliers can step forward to participate by joining UEBT and submitting an improvement plan that shows they are making gradual and verifiable steps to meet the UEBT Ethical BioTrade standard. UEBT will verify that the suppliers are delivering as promised, in collaboration with external auditors.

Introduction

The Initiative for Responsible Carnauba is made up of companies and non-profits (including UEBT), and government agencies working to ensure more responsible production of Carnauba. We are supporting suppliers to improve conditions in sourcing areas, promoting compliance with the UEBT standard that assures sourcing with respect for people and biodiversity, and working to finding new approaches to social and environmental challenges in sector. To date, we have developed an action plan focusing on good harvesting practices, traceability and transparency of Carnauba wax origins, and shared learning and training. We plan to involve as many suppliers and industry players as possible, as well as social interest groups. This includes wax processors in Brazil, and other important players who affect working conditions.
Challenges in Carnauba

The Carnauba sector holds many challenges. These problems are often systemic, with a wide range of factors involved that contribute to the challenges. These challenges include:

Environmental challenges:
- **Degradation of local ecosystems, soil and water resources:** Carnauba trees are of particular importance for the gallery forests in a region that suffers from drought most of the year.
- **Deforestation:** Carnauba areas are often destroyed because they are not seen as economically profitable enough and the interest in protecting the trees is therefore limited. Inappropriate harvesting techniques also lead to the trees’ destruction.
- **Spread of invasive species:** The areas are hardly cultivated during the rest of the year, which leads to the rapid spread of invasive exotic species which suffocates carnauba trees.
- **Environmental policies** are poorly implemented.

Social challenges:
- **Precarious working conditions:** (seasonal labour, difficult harvesting and safety conditions, lack of regulations, poor pay, lack of access to social benefits, lack of organization among workers, etc.)
- **Producers are not always landowners:** seasonal workers and producers in the carnauba value chain do not own the land in over 90% of cases.

Economic challenges:
- Lack of alternative sources of income.
- Lack of technical innovation.
- Lack of traceability.
- Poorly established quality standards.

In the last few years, several actors have decided to take action to improve conditions in the sector: The Brazilian Government through its Environmental and Labour ministries, the Working Group on Carnauba by InPACTO, and the Sustainable Carnauba project by the Brazilian wax industry syndicate (Sindicarnauba) and the NGO Associação Caatinga. Our initiative supports the efforts of local groups by catalysing engagement among buying companies of high quality Carnauba grades in Europe and elsewhere.

How to participate

Companies who are actively involved in the collection of carnauba (suppliers) as well as companies processing carnauba or manufacturing final products can step forward to participate in the Initiative for Responsible Carnauba. Here are the required steps to follow for companies wishing to participate in the Initiative:

1. Sign the TAC (Termos de Ajuste de Conduta) with the Brazilian government.
2. Obtain UEBT membership (see below).
3. Submit an application form to the Initiative for Responsible Carnauba and sign the joint agreement that shows your commitment to improvements.
4. Implement actions in line with the UEBT Ethical BioTrade standard such as risk assessment of supply chains, implementation of internal audits and traceability up to the producer/area.
**UEBT membership**

UEBT membership for supplier companies is required as a precondition for joining the *Initiative for Responsible Carnauba*. It shows that you intend to take action in line with international good practice. UEBT is an international non-profit association that promotes sourcing with respect. UEBT supports and verifies companies’ commitments to innovation and sourcing that contribute to a world in which people and biodiversity thrive.

As part of the initiative, UEBT will verify the companies’ practices against its standard. In light of the sector’s challenges, the UEBT will pay particular attention to working conditions and sustainable use of biodiversity.

Companies shall follow the pathway below to become a Trading Member:

1. Commit to UEBT membership conditions and obligations.
2. Sign the TAC.
3. Complete and submit an application and pay registrations fees.
4. Undergo an external assessment performed by UEBT or a qualified external certification body that covers the company’s ethical sourcing system. This first audit shall verify compliance with the UEBT Entry Indicators at the level of the company and any collection or harvesting sites it owns or controls.
5. Submit a workplan focused on improving the company’s ethical sourcing system that must be approved by UEBT or the certification body. Pay an annual membership fee.

**Towards ‘UEBT Certified’ Carnauba**

Local processing companies in the *Initiative for Responsible Carnauba* set targets to achieve UEBT’s Carnauba certification. This means that they source, produce, and sell Carnauba as “responsible Carnauba” or “UEBT certified Carnauba.” These local processing companies can use the UEBT certified trust mark on their certified Carnauba wax. It’s important to know that verification, which is part of the Initiative’s improvement requirements for participation, is not the same as certification. Certification means full compliance with the UEBT Ethical BioTrade Standard and this will be independently audited by third-party Certification Bodies approved by UEBT. Generally, the steps are:

- ➔ Become a UEBT member.
- ➔ Invest in improvement of local practices for compliance with the UEBT Ethical BioTrade standard.
- ➔ Implement an internal audit system in 100% of the supply chain part of the scope to be certified.
- ➔ Define applicability of legal requirements on access and benefit sharing (ABS) and, if applicable, take steps towards compliance.
- ➔ Request a UEBT qualified certification body to conduct an independent certification audit checking the physical areas of wild collection or harvest, and the conditions under which people work, both in the sourcing areas and in the processing of raw materials. This includes an inspection of forests and/or agricultural lands, and interviews with harvesters, farmers, farmworkers, smallholders, and/or pickers. The certification body will check 100% of the supply chain part of the certification scope.
- ➔ Address any non-conformities.
- ➔ Receive a positive certification recommendation from the certification body.
- ➔ Obtain UEBT certification once independent audits verify compliance with the UEBT standard in the areas where Carnauba is sourced. Traceability through to producer/collection area is always required.

---

© Union for Ethical BioTrade (UEBT) | Joining the Initiative for Responsible Carnauba
“Working with UEBT, we have submitted an improvement plan for ethical sourcing, making us the first Carnauba wax manufacturer to be approved as a UEBT member. This means we are committed to meeting international standards for ethical sourcing and we will show improvement over time towards this goal. UEBT verifies our commitment and has approved our workplan. Someday we also hope to achieve UEBT certification for our entire Carnauba supply.”

—Lara Pontes, President of Pontes Indústria de Cera

Why get certified?

Suppliers and processors:
› Get independent validation that your Carnauba is sourced with respect for people and biodiversity
› Show you are committed to continuous improvement
› Improve market access

Manufacturers and brands:
› Be transparent about your sourcing practices
› Understand your supply chain and improve traceability
› Manage operational and reputational risk

Carnauba is an important ingredient for many products, as well as a challenging sector to work in today. The Initiative for Responsible Carnauba is committed to having an effective improvement initiative that brings together buyers and processors of Carnauba wax products to drive good practice. We welcome additional participants, who can express their interest and intent by writing to us. Local processing companies in Brazil can reach us at brazil@uebt.org. For any additional information please send us an email at info@uebt.org.

Learn more:
› Membership Conditions and Obligations for Trading Members
› Natural ingredient certification
› Certification guidance for UEBT/UTZ and UEBT natural ingredient certification
› Certification protocol for UEBT natural ingredient certification
› Certification Checklist for UEBT natural ingredient certification

UEBT is a non-profit association that promotes sourcing with respect. Its mission is to support and validate best practices of companies committed to ethical sourcing and innovation of natural ingredients for the benefit of people and biodiversity.

Photos: © Pontes Indústria de Cera