

# SBP

Sustainable Biomass Partnership

## Regional Risk Assessment for Lithuania: SBP Response to Consultation



## June 2016

*For further information on the SBP Framework and to view the full set of documentation see [www.sustainablebiomasspartnership.org](http://www.sustainablebiomasspartnership.org)*

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# Contents

<b>1</b>	<b>Introduction</b> .....	<b>1</b>
<b>2</b>	<b>Regional Risk Assessment Procedure</b> .....	<b>2</b>
<b>3</b>	<b>SBP public consultation</b> .....	<b>3</b>
3.1	Consultation period .....	3
3.2	Comments received .....	3
3.3	Summary and consideration of comments received .....	4
3.3.1	Stakeholder comments .....	4
<b>4</b>	<b>SBP internal review</b> .....	<b>5</b>
<b>5</b>	<b>Approval and endorsement of Regional Risk Assessment</b> .....	<b>6</b>

# 1 Introduction

Regional Risk Assessments (RRAs) are a key part of SBP's focus on identifying and mitigating risks associated with sustainably sourcing feedstock for biomass pellet and wood chip production. The SBP Framework is designed to provide assurance that feedstock is sourced legally and sustainably.

Feedstock certified at the forest level through FSC<sup>®</sup> or PEFC schemes is considered SBP-compliant. All other feedstock must be evaluated using a risk-based approach if it is to count towards an SBP-compliant claim.

The Biomass Producer – typically a pellet mill or wood chip producer – is responsible for carrying out the risk assessment and putting in place mitigation measures to manage any specified risks such that the risks can be considered to be controlled and hence low risk. It is the role of an independent, third-party Certification Body, approved by SBP, to check that the feedstock evaluation has been correctly undertaken and that any mitigation measures are being effectively implemented.

The purpose of an RRA is to evaluate an entire geographic region and determine the risks associated with sourcing feedstock for biomass pellet or wood chip production from that region. Thus, the need for individual Biomass Producers to conduct risk assessments is avoided and, therefore, consistency between Biomass Producers' risk assessments guaranteed. The SBP RRA Procedure also ensures active engagement with a diverse range of stakeholders in the region.

Following a successful pilot, SBP commissioned RRAs for the three Baltic States – Estonia, Latvia and Lithuania. Existing FSC<sup>®</sup> risk assessments formed the basis of the RRAs, which were then supplemented with the additional elements required by SBP.

This SBP response to consultation concerns the RRA for Lithuania.

## 2 Regional Risk Assessment Procedure

The SBP Regional Risk Assessment (RRA) Procedure specifies the requirements and processes that must be followed in order to develop and endorse SBP risk assessments of regions or countries.

The Procedure requires that a Working Body (WB) be appointed by SBP to conduct an RRA. Having sufficient, suitably qualified staff to perform the risk assessment, demonstrated competence with the SBP Framework, and relevant knowledge of the language, laws and customs of Estonia, Latvia and Lithuania, NEPCon was appointed as the WB responsible for conducting the RRAs for the three Baltic states.

At the end of August 2015, NEPCon submitted a draft RRA report for Lithuania to SBP. SBP then undertook its own public consultation and internal review of the draft RRA – see Sections 3 and 4.

## 3 SBP public consultation

### 3.1 Consultation period

On 17 September 2015, the draft Regional Risk Assessments for Estonia, Latvia and Lithuania were published on the SBP website at: <http://www.sustainablebiomasspartnership.org/documents/consultation-documents/draft-regional-risk-assessments>. Interested parties were invited to provide written comments on the drafts and the Regional Risk Assessment Procedure by 16 October 2015.

### 3.2 Comments received

Comments on the draft RRAs were received from the following organisations/individuals:

#### **Estonia RRA**

- Purutuli, Ardor and Warmeston (joint response)
- Estonian Forest and Wood Industries Association
- Stora Enso

#### **Latvia RRA**

- Latvian Forest Owners Association (LFOA)
- JSC Latvia's State Forest (LVM)
- Latgran and Graanul Invest (joint response)

#### **Lithuania RRA**

- No comments received

#### **General RRA**

- Timber Biofuel Industries, LLC

#### **Draft RRA Procedure**

- No comments received

## 3.3 Summary and consideration of comments received

### 3.3.1 Stakeholder comments

#### Remote sensing technology

##### Stakeholders' views

A general comment was submitted suggesting that remote sensing technology (satellite and aerial imagery) should be a basic requirement in Regional Risk Assessments for establishing baseline forest cover characteristics and sustainability goals.

It was argued that both current and historical (1-20 years) land cover and land use data are important data sources for determining sustainability and claims for continued sustainable forest management. Further, that the use of remote sensing technology can generate data cost effectively to provide consistent and objective land cover information pertaining to areas of interest within the geographic scope of RRAs – information that is a central component to risk assessment.

##### NEPCon's view

In conducting the RRA for Lithuania, certain of the studies used in the process had, indeed, utilised remote sensing technology. The value of the technology is recognised and where available the results can be put to good use.

##### SBP conclusion

SBP concludes that RRAs are not designed to specify which technology should be used to meet sustainability and other goals; this is considered to be overly prescriptive. There are pros and cons associated with all technologies and the evidence should be evaluated accordingly.

## 4 SBP internal review

Following the close of the public consultation period, SBP performed an internal review of NEPCon's draft RRA report for Lithuania against the procedural requirements. The independent Technical Committee also reviewed the draft RRA report as part of the internal review process. Comments arising from the internal review were directed back to NEPCon. NEPCon provided a complete response to each of the issues raised and revised the draft RRA report to include additional clarifications and/or explanations as necessary. SBP is satisfied that the RRA was conducted in line with the Procedure.



## 5 Approval and endorsement of Regional Risk Assessment

SBP has approved and endorsed the RRA for Lithuania as published alongside this document on 15 June 2016. The endorsed RRA will remain valid for a period of five (5) years from the approval date, although it may be superseded if a new RRA is completed within the five (5) year period.