

# SBP Regional Risk Assessment Procedure

[www.sbp-cert.org](http://www.sbp-cert.org)



## Version 1.1 May 2017

**Adapted from Reference sources:** *Annex A of The Development and Approval of FSC® National Risk Assessments FSC-PRO-60-002 V3-0 EN and National Risk Assessment Framework FSC-PRO-60-002a V1-0 EN FSC®.*

*For further information on the SBP certification system and to view the full set of documentation see [www.sbp-cert.org](http://www.sbp-cert.org)*

### *Document history*

*Version 1.0: published 7 April 2016*

*Version 1.1: published 2 May 2017*

© Copyright Sustainable Biomass Program Limited 2017

# Contents

<b>1</b>	<b>Purpose and scope .....</b>	<b>2</b>
<b>2</b>	<b>Appointment of working body to conduct Regional Risk Assessments.....</b>	<b>3</b>
<b>3</b>	<b>Assessment process .....</b>	<b>4</b>
<b>4</b>	<b>Stakeholder consultation .....</b>	<b>7</b>
<b>5</b>	<b>Regional Risk Assessment report.....</b>	<b>10</b>
<b>6</b>	<b>SBP evaluation of Regional Risk Assessment reports .....</b>	<b>11</b>
	<b>Annex 1: Stakeholder groups to be consulted in the RRA process .....</b>	<b>14</b>
	<b>Annex 2: SBP risk reporting template .....</b>	<b>16</b>

# 1 Purpose and scope

- 1.1 This document specifies the requirements and procedures for the development of risk assessments for a country, or a region within a country, and their endorsement by SBP. Such risk assessments are referred to as 'Regional Risk Assessments' or 'RRAs'.
- 1.2 If a party (or parties) wishes to sponsor the development of an RRA for a specific region it must contact SBP on [info@sbp-cert.org](mailto:info@sbp-cert.org) for further guidance before commencement.
- 1.3 RRAs can only be endorsed by SBP if they are developed in accordance with this Procedure and submitted to SBP for approval.

Note: SBP is a not-for-profit organisation with a limited budget and is unable to fund multiple RRAs. SBP developed the RRA Procedure and financed its pilot testing in the Baltic States; the Procedure is available for any organisation or initiative to use. A party may choose to conduct a risk assessment at its own cost, or to collaborate with other parties located in the same region and share the cost.

## 2 Appointment of working body to conduct Regional Risk Assessments

- 2.1 A 'sponsoring body' shall be responsible for overseeing the development and financing of the RRA. The sponsoring body might be a party (or parties) working singly or on a collaborative basis, for example, a company or an organisation or a group of companies or stakeholders in partnership. The sponsoring body need not be a legally constituted organisation. The sponsoring body will appoint a 'working body' (WB) to conduct the Regional Risk Assessment (RRA).
- 2.2 Prior to appointment, SBP will review and confirm that a proposed WB:
- a) has sufficient, suitably-qualified staff to perform the risk assessment;
  - b) has demonstrated competence with the SBP standards; and
  - c) has relevant knowledge of the language, laws and customs of the region(s) in which they will operate.

## 3 Assessment process

### 3.1 Co-ordinator

- 3.1.1 As a first step in the development of an RRA, the WB shall appoint a Co-ordinator.
- 3.1.2 The Co-ordinator is responsible for facilitating and managing the RRA process, including managing the assessment process, preparing draft and final draft RRA reports, and conducting stakeholder consultations, according to the requirements of this procedure.

### 3.2 Determination of geographic scope

- 3.2.1 The WB is responsible for determining the areal extent of the region under assessment, or the 'geographic scope' of the assessment.
- 3.2.2 In determining geographic scope, the WB shall consider the homogeneity of the region under assessment.
- 3.2.3 SBP expects that a single 'region' should share the same characteristics for:
  - a) legislation covering land ownership, use and harvesting rights;
  - b) legislation covering biodiversity, water, air and soil protection;
  - c) legislation covering basic labour rights and health and safety of forest workers;
  - d) legislation covering waste handling and disease control; and
  - e) legislation covering tree felling licensing and replanting/regeneration.
- 3.2.4 The WB may also consider relevant aspects of functional and/or geographical scale, which may include the following:
  - a) Geographical scale – determination based on broad geographical boundaries, for example, administrative sub-divisions (states, counties, provinces, etc.) and/or biological and/or geographical sub-divisions (bio-regions, eco-regions, water catchments, watersheds, etc.).
  - b) Functional scale – determination based on non-geographical characteristics, for example, type of forested area (for example, plantations, managed forests and natural forests), tenure or ownership (for example, public, private, corporate, indigenous, and community forests), scope of management (for example, the same hunting regime, presence/absence of particular planning requirements, type and/or quality of forest inventory, etc.), and scale, intensity and risk of forest management operations.
- 3.2.5 Boundaries of the geographical scope shall be clearly described or presented on maps.
- 3.2.6 If the risk assessment (see below) indicates that substantially different levels of risk exist across a given region (that is, there is a non-homogeneous distribution of risk), then it may be necessary for

the WB to revisit the original boundaries that were proposed for the region, and, where appropriate, reformulate the area as two or more separate regions in the assessment.

### 3.3 Applicable standard

3.3.1 The WB will conduct the regional risk assessment against SBP Standard 1: Feedstock Compliance Standard (using the version current at the beginning of the RRA process), and using the template in Annex 2 of this document.

Note: The risk assessment covers the risk in the Supply Base; it does not assess the management systems in operation at a biomass production site, which are covered by a Biomass Producer's Supply Base Evaluation.

3.3.2 All the indicators of SBP Standard 1 will be assessed for risk.

3.3.3 The FSC National Risk Assessment Framework document FSC-PRO-60-002a provides a useful reference source for assessing risk.

### 3.4 Gathering of information

3.4.1 Information shall be gathered to fully assess the defined indicators in Annex 2 of this document.

3.4.2 All data used in the risk assessment shall be evaluated for relevance and reliability. The evaluation of information should be based on objective criteria, for example, publication indexes, data providers, relevance of the information considering the validity date of the risk assessment, dates of publication, methodology used for data gathering, etc. The most up-to-date information sources must be used; should sources be more than five years old their adequacy must be verified.

3.4.3 Whenever possible, information relevant to the specific context of forest management in the supply area should be used.

3.4.4 Where practicable, remote-sensing data sets (that is, spatial information from aerial or satellite imagery) should be used to verify or establish baseline forest cover characteristics and land use patterns in relation to sustainability goals for the region.

3.4.5 Stakeholder consultation during RRA development constitutes an important source of information as described in Section 4. The WB shall, at a minimum, consult with all stakeholders (list presented in Annex 1) prior to final designation of risks. However, it is acceptable for the WB to assign provisional risk levels prior to stakeholder consultation for the purposes of facilitating stakeholder input as part of the process.

3.4.6 Data sources shall be referenced in all draft and final draft reports so that they are verifiable by external parties.

### 3.5 Designation of risk

3.5.1 Risk designation shall be conducted separately for each indicator. Should there be substantial doubt as to the risks associated with different categories of feedstock (for example, types of controlled

wood, FSC-certified or PEFC-certified material, primary secondary or tertiary feedstocks), the WB should evaluate further based on the context and any SBP guidance provided.

- 3.5.2 For each indicator, the region under assessment shall be determined as:
- a) 'Low risk', when evidence indicates that the low risk threshold(s) is met, and there is no other information that would lead to a 'specified risk' designation; OR
  - b) 'Specified risk' when available means of verification do not show evidence that the low risk category is met or that one or more specific risks were identified.
- 3.5.3 The WB may identify new or additional risk factors in a region (for example, due to national conditions) which have not been specifically identified in SBP indicators. In case of doubt, WBs shall apply a precautionary approach and assign a 'specified risk' designation.
- 3.5.4 For each indicator, the rationale for risk designation shall be provided in relation to the threshold, means of verification (as used in the risk assessment), and evidence/information used. Additionally, for 'specified risks', the type of risk(s) shall be described in detail.
- 3.5.5 When consultation with experts is required during a risk assessment, the WB shall determine and document the expertise of those individuals and their role in the process.
- 3.5.6 Risk designations shall consider the scale, intensity and management arrangements within the area under assessment.
- 3.5.7 When assessing risk with regards to scale, intensity and management arrangements within a given area, the overall impact of these operations on the elements elaborated in the indicators shall be considered.
- 3.5.8 Results of the risk assessment shall be reported using the SBP Risk Reporting Template provided in Annex 2.
- 3.5.9 Where 'specified risks' are identified, the WB may propose a set of indicative/possible mitigation measures which, if implemented, should act to reduce those specified risks. Biomass Producers may determine that other mitigation measures are more effective in their particular case.



## 4 Stakeholder consultation

- 4.1 Once the risk assessment has been completed, the WB will prepare a draft RRA report for stakeholder consultation (see Section 5 Regional Risk Assessment report). The WB shall publicly consult on the draft RRA report to ensure the RRA's relevance to national/regional conditions and to allow stakeholders to contribute to the RRA process.
- 4.2 The Co-ordinator shall inform SBP about the start date of the consultation at least three (3) weeks in advance and send the draft RRA to SBP for review at least ten (10) days before it is published for public consultation.
- 4.3 The Co-ordinator shall identify stakeholders according to Annex 1 and shall invite them to comment on the draft RRA report. The Co-ordinator shall ensure that stakeholders from all stakeholder groups listed in Annex 1 are invited to participate.
- 4.4 The Co-ordinator shall maintain a list of identified stakeholders and their respective contact details.
- 4.5 Stakeholders shall be given a period of at least thirty (30) days to submit comments on the draft RRA report.
- 4.6 Information sent to stakeholders for consultation shall include the following:
  - a) A brief description of the SBP certification system, including direct reference to the current version of SBP Standard 1;
  - b) A brief description of the purpose of the RRA, the scope of the risk assessment and the objective of stakeholder consultation, including a request for comments;
  - c) The start and end dates of the stakeholder consultation period;
  - d) The draft RRA report;
  - e) Contact details of the Co-ordinator;
  - f) An indicative timeline for the completion of the proposed RRA. (It should be made clear that the timeline is only an estimate);
  - g) A statement that comments will be published unless confidentiality is requested; and
  - h) A statement that the RRA development process is aligned with this SBP Procedure.
- 4.7 The Co-ordinator shall be proactive in seeking input from representatives of identified stakeholders and in using a variety of means as appropriate to the stakeholders being contacted.
- 4.8 Consultation techniques may include: face-to-face meetings, personal contact by phone or letter, notices published in the national and/or local press and on relevant websites, local radio announcements, announcements on local customary notice boards in the language of the local

people, and emails in the language of the recipients. The Co-ordinator should consider holding stakeholder workshops to provide a forum for direct input and discussion.

- 4.9 The Co-ordinator is responsible for facilitating culturally appropriate outreach to representatives of all identified stakeholders.
- 4.10 The Co-ordinator shall acknowledge receipt of comments and ensure their proper collection.
- 4.11 The WB shall review all comments by stakeholders and address them in the final draft RRA report with the goal of achieving consensus, in line with SBP's vision and mission.
- 4.12 The Co-ordinator shall respond to all stakeholders who participate in the consultation process and indicate how their comments were taken into account; such feedback shall be provided before, or at, the release of the final draft RRA for a subsequent consultation period or prior to its submission to SBP for endorsement. Once the final draft is prepared stakeholders shall only be informed of the result/outcome of the consultation. The WB shall have a complaints procedure in place to deal with any stakeholder complaints. Should the WB's complaints procedure be exhausted, the complaint may be referred to SBP and dealt with using the SBP Complaints Procedure.
- 4.13 The Co-ordinator shall prepare a stakeholder consultation report which includes:
  - a) A summary of the issues raised and how they were addressed;
  - b) An analysis of the range of stakeholder groups who submitted comments; and
  - c) An unedited copy of all comments as an Annex to the report.
- 4.14 Stakeholder consultation reports shall be prepared in English. Copies of all stakeholder comments may be required to be translated from their original language into English.
- 4.15 Stakeholder consultation reports shall be appended in their entirety to the final draft RRA report, unless specific stakeholders have requested confidentiality in which case their comments shall be treated as confidential material.
- 4.16 In addition to the requirements of 4.15, the appendix shall also include a description of how information obtained through the stakeholder consultation was used by the WB (for example, report revision).
- 4.17 After the final draft RRA has been endorsed by SBP, the final SBP-endorsed RRA report will be published on the SBP website (see section 6). However, if advance publication is desirable (for example, of the draft or final draft version) for the purpose of communicating the RRA process to stakeholders, then SBP and the WB may agree to make an unapproved version of the report available. The status of the report shall be clearly communicated.

NOTE: Means of public availability should be determined based on national/regional conditions.

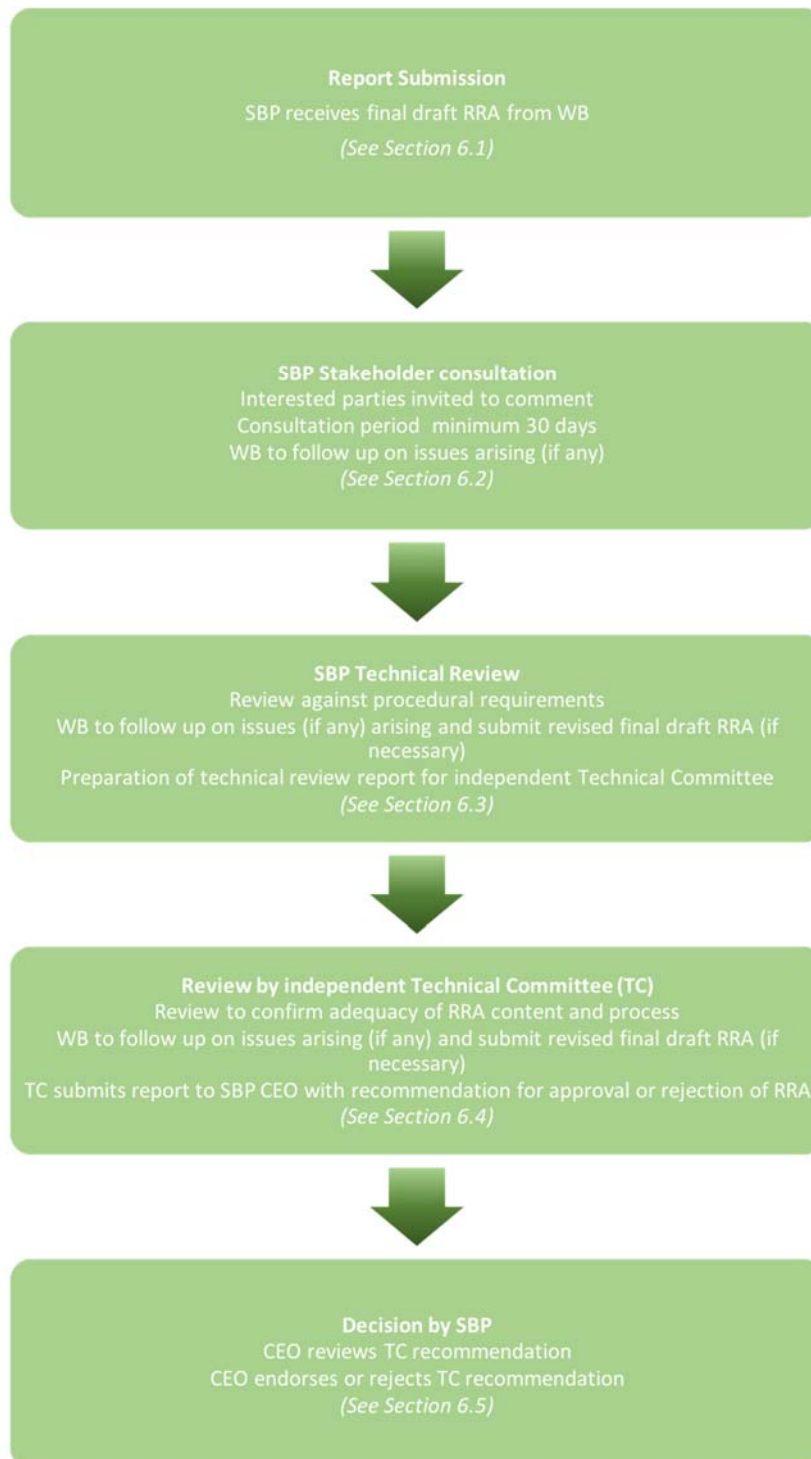
- 4.18 Translations of draft and final draft RRA reports shall be prepared at the discretion of the WB taking into account the needs of local stakeholders.

- 4.19 The need for additional consultation periods prior to the development of the final draft RRA report shall be at the discretion of the WB, taking into account the comments received during the public consultation. Where substantive issues have been identified, additional rounds of consultation should be undertaken. The period for subsequent rounds of consultation may be limited to thirty (30) days.

## 5 Regional Risk Assessment report

- 5.1 Once the risk assessment has been completed, the WB will prepare at least two versions of the RRA report:
- a) The draft RRA report to be used for the public stakeholder consultation (according to Section 4); and
  - b) A final draft RRA report developed based on stakeholder consultation and which has been prepared for submission to SBP for endorsement.
- 5.2 RRA reports shall contain the following elements:
- a) objective;
  - b) scope;
  - c) name and contact details of the Co-ordinator and the WB;
  - d) names and qualifications of technical experts (if applicable);
  - e) background;
  - f) summary of identified risk areas;
  - g) list of key stakeholders consulted and the stakeholder report(s);
  - h) risk scores for each indicator; and
  - i) a reference list for all data sources cited (publications, studies, documents, etc).
- 5.3 RRA reports will provide sufficient detail to demonstrate that the requirements of this procedure have been fulfilled.
- 5.4 Rationales for the assignment of risk level to each indicator will be presented in reports using the SBP Risk Reporting Template given in Annex 2.
- 5.5 Reports will provide a detailed description of the stakeholder consultation process that was utilised.
- 5.6 Final draft RRA reports shall contain an appendix providing all stakeholder comments received during the public consultation on the draft RRA report.
- 5.7 The WB is responsible for completing an internal review of the final draft RRA report to ensure that it complies with all SBP requirements. SBP will not accept RRA reports unless they are signed by an authorised representative of the WB.

## 6 SBP evaluation of Regional Risk Assessment reports



## 6.1 Report submission

- 6.1.1 The WB shall submit the final draft RRA report to SBP for evaluation and endorsement.
- 6.1.2 The final draft RRA report shall contain all the elements specified in section 5 of this procedure.
- 6.1.3 The final draft RRA report shall be in English. If the original document was translated, SBP will treat the English translation as the official version.

## 6.2 SBP stakeholder consultation

- 6.2.1 On receipt of the final draft RRA report, SBP shall undertake a public stakeholder consultation. The final draft RRA report will be published on the SBP website with an invitation for interested parties to submit written comments on both the final draft and the RRA Procedure followed. The consultation period shall be for a minimum of thirty (30) days.
- 6.2.2 Following the close of the public consultation period, SBP shall review all comments received and where necessary instruct the WB to follow up on any issues arising.

## 6.3 SBP technical review

- 6.3.1 Within five (5) days of the completion of the stakeholder consultation process and any follow up action, the SBP's designated person shall arrange for a technical review, by SBP technical assessors, of the final draft RRA (or revised final draft RRA) against the procedural requirements specified in this document. Comments arising from the technical review shall be directed to the WB for a complete response to each of the issues raised, and where necessary, a revised (or further revised) final draft RRA report including additional clarifications and/or explanations shall be provided to SBP.
- 6.3.2 Within five (5) days of receipt of the final draft RRA report, or where necessary the revised (or further revised) final draft RRA report (see section 6.3.1), the SBP technical assessor will prepare a technical review of the draft RRA report (or where necessary the revised (or further revised) final draft RRA report). The technical review shall include a report prepared for the independent Technical Committee (TC) to facilitate the actions specified in section 6.4.

## 6.4 Review by independent Technical Committee

- 6.4.1 In the first instance, the TC shall review the technical review report to confirm the adequacy of the RRA content and process using the following criteria:
  - a) the structure and content of the report conforms to SBP requirements as set forth in this procedure; and
  - b) sufficient information is presented to conclude that the risk assessment was conducted in accordance with SBP procedures.
- 6.4.2 If the TC finds the report to be inadequate according to criteria in 6.4.1, it will be returned directly to the Co-ordinator and WB for resolution without any further consideration by SBP.

- 6.4.3 For any reports which are returned to the WB, the TC shall prepare a short description of the report's shortcomings. The TC may also make recommendations for improvement.
- 6.4.4 If the TC finds the report to be adequate according to criteria in 6.4.1, within ten (10) working days, the TC shall evaluate whether the risk assessment can be considered accurate and comprehensive. The TC will prepare a brief narrative justifying its conclusion.
- 6.4.5 Following review, the TC shall make a specific recommendation to the SBP Chief Executive Officer on whether to approve or reject the final draft RRA report or, where necessary, the revised (or further revised) final draft RRA report.

## 6.5 Decision by SBP

- 6.5.1 The SBP's Chief Executive Officer shall review the recommendation from the TC and take a decision as to whether:
  - a) SBP endorses the final draft RRA report or, where necessary, the revised (or further revised) final draft RRA report; or
  - b) SBP rejects the final draft RRA report or, where necessary, the revised (or further revised) final draft RRA report.
- 6.5.2 SBP's decision will be final.
- 6.5.3 SBP shall communicate the decision to the Co-ordinator and WB.
- 6.5.4 In cases where the report is rejected, SBP shall provide the Co-ordinator and WB with a rationale for the rejection and SBP may make suggestions for improvements or revisions.
- 6.5.5 In cases where the report is endorsed, SBP will publicly announce the RRA and publish it on the SBP website.
- 6.5.6 Endorsed RRAs remain valid for a period of five (5) years from the approval date by SBP, although they may be superseded if a new RRA is completed within the five (5) year period.

# Annex 1: Stakeholder groups to be consulted in the RRA process

Stakeholders representing the interests listed below shall be identified and notified during the process of RRA development. Each group specified may be represented by an unlimited number of representatives, provided that a balance of inputs into the RRA process is maintained. The list is not comprehensive and any other stakeholder groups relevant for the RRA process under national/regional conditions shall also be identified and notified.

## 1 Economic interests

- a) Forest owners and/or managers of large, medium and small forests; high-, medium- and low-intensity managed forests;
- b) Forest contractors (including loggers);
- c) Representatives of forest workers and forest industries;
- d) Stakeholders in the regional biomass sector, including producers of woody biomass for energy production and associated supply chain actors; and
- e) Certificate Holders of relevant certification schemes, including FSC, PEFC, SBP and SFI.

## 2 Social interests

- a) NGOs involved or with an interest in social aspects of forest management and other related operations;
- b) Forest workers association;
- c) International, national and local trade/labour unions;
- d) Representatives of local communities involved or with an interest in forest management;
- e) Representatives of indigenous peoples and/or traditional peoples (if present and/or holding rights); and
- f) Representatives of recreation interests, where present.

## 3 Environmental interests

- a) NGOs involved or with an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise:
  - Biological diversity;
  - Water and soil;
  - Environmental-related High Conservation Values; and



- Development of renewable and sustainable energy resources.

b) Local communities and indigenous peoples' representatives.

- 4 Certification Bodies that are actively involved in forest certifications within the country
- 5 National and state forest agencies
- 6 Experts in Controlled Wood and other relevant feedstock categories
- 7 Research institutions and universities
- 8 Official representatives of forestry certification schemes (for example, FSC, PEFC) from offices in the region

## Annex 2: SBP risk reporting template

These elements will be included in the following order in the report:

- a) Title page (Including the title “SBP Regional Risk Assessment for [Region]”, version (draft or final draft) and date)
- b) Statement of scope (Including map and written definition of the region)
- c) Table of contents
- d) Introduction (Including reference to the SBP RRA process)
- e) Methodology (Including how the RRA was undertaken)
- f) Regional background (Including the forestry context in which the RRA was undertaken)
- g) Summary of findings (Including an overview of the findings)

This template shall be used to record the rationale for designating risk levels to each indicator.

	Indicator
1.1.1	The Supply Base is defined and mapped.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>1.1.2</b>	Feedstock can be traced back to the defined Supply Base.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>1.1.3</b>	The feedstock input profile is described and categorized by the mix of inputs.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>1.2.1</b>	Legality of ownership and land use can be demonstrated for the Supply Base.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>1.3.1</b>	Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>1.4.1</b>	Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>1.5.1</b>	Feedstock is supplied in compliance with the requirements of CITES.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>1.6.1</b>	Feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.1.1</b>	Forests and other areas with high conservation values in the Supply Base are identified and mapped.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.1.2</b>	Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.1.3</b>	Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.2.1</b>	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.2.2</b>	Feedstock is sourced from forests where management maintains or improves soil quality.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.2.3</b>	Key ecosystems and habitats are conserved or set aside in their natural state.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.2.4</b>	Biodiversity is protected.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.2.5</b>	The process of residue removal minimises harm to ecosystems.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.2.6</b>	Negative impacts on ground water, surface water, and water downstream from forest management are minimised.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.2.7</b>	Air quality is not adversely affected by forest management activities.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.2.8</b>	There is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>



	Indicator
<b>2.2.9</b>	Methods of waste disposal minimise negative impacts on forest ecosystems.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.3.1</b>	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.3.2</b>	Adequate training is provided for all personnel, including employees and contractors.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.3.3</b>	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy including employment.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.4.1</b>	The health, vitality and other services provided by forest ecosystems are maintained or improved.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.4.2</b>	Natural processes, such as fires, pests and diseases are managed appropriately.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.4.3</b>	There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.5.1</b>	The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.5.2</b>	Production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

	Indicator
<b>2.6.1</b>	Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.7.1</b>	Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.7.2</b>	Feedstock is not supplied using any form of compulsory labour.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.7.3</b>	Feedstock is not supplied using child labour.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.7.4</b>	Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.7.5</b>	Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.8.1</b>	Appropriate safeguards are put in place to protect the health and safety of forest workers.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA <div style="text-align: center;"><input type="checkbox"/></div>

	Indicator
<b>2.9.1</b>	Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.9.2</b>	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
<b>2.10.1</b>	Genetically modified trees are not used.
Finding	
Means of Verification	
Evidence Reviewed	
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>