

Extending the validity of the SBP- endorsed Regional Risk Assessment for Lithuania: SBP Response to Consultation

Sustainable Biomass Program
sbp-cert.org



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For further information on the SBP certification system and to view the full set of documentation see www.sbp-cert.org

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Document history

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In the case of inconsistency between translations, the official English language version shall always take precedence.

SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact: info@sbp-cert.org

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Contents

1	Introduction	1
2	Justification for extending the validity of the RRA	2
3	Public consultation on extending the validity of the RRA	3
3.1	Consultation period	3
3.2	Comments received	3
3.3	Consideration of comments received	3
4	Internal review	5
5	Review by the independent Technical Committee	6
6	Approval for extending the validity of the SBP-endorsed RRA for Lithuania	7

1 Introduction

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

In accordance with the SBP RRA Procedure, SBP-endorsed RRAs remain valid for a period of five (5) years from the approval date. The RRA for Lithuania was first published on 15 June 2016 and consequently its validity expired on 14 June 2021.

In early 2021, SBP sought stakeholder feedback on the proposal to extend the validity of the existing SBP-endorsed RRA for Lithuania to coincide with the end of the transition period¹ for the revised SBP Standards (v2.0).

¹ Publication of the revised SBP Standards (v2.0) is planned for the end of 2021. A transition period will follow within which time Certificate Holders will need to ensure compliance with the requirements of the revised Standards. At the time of writing the transition period had not been defined.

2 Justification for extending the validity of the RRA

The Standards Development Process currently underway is reviewing each of the Standards. As part of the Process, it is anticipated that Standards 1 and 2 will be published by the end of 2021. Standard 1 is the foundation of the SBP RRAs and any revisions to that Standard will trigger the need to update all existing SBP-endorsed RRAs.

Once the revised Standards are published there will be a transition period allowing time for Certificate Holders to comply with the revised requirements. From the end of that transition period it will be mandatory for all Certificate Holders to comply with the revised requirements. The RRAs will require updating in line with the revised Standards and that will be undertaken in a timely fashion within the same transition period, such that complying with the requirements of the updated RRAs will also be mandatory from the end of the transition period.

For that reason it was proposed to extend the validity of the RRA for Lithuania to coincide with the end of the transition period for the revised SBP Standards (v2.0).

SBP consulted Preferred by Nature (formerly NEPCon), the Working Body responsible for developing the original RRA for Lithuania, on the proposal to extend its validity. On the basis that there have been no major changes in relevant legislation and/or forestry practices, and that there is no additional information to suggest otherwise, Preferred by Nature has recommended that no changes are made to the risk designations of the original RRA.

SBP specifically drew attention to Indicator 2.9.2, relating to maintenance of forest carbon, and asked Preferred by Nature to evaluate whether the situation in Lithuania had changed since 2016. Preferred by Nature concluded that, according to recent studies by FAO (see: http://www.amvmt.lt/images/naujienos/-bendra/FRA_RSS_2020/RSS2020_LTU_ataskaita.pdf), there is a clear trend that the forested area in Lithuania is increasing and that logging activities do not exceed sustainable levels.

It was, therefore, proposed to extend the validity of the SBP-endorsed RRA for Lithuania without further revision. The next review will be undertaken against the revised Standard 1.

3 Public consultation on extending the validity of the RRA

3.1 Consultation period

On 22 January 2021, a proposal to extend the SBP-endorsed RRA for Lithuania was published on the SBP website at: <https://sbp-cert.org/consultation-on-extending-the-validity-of-the-regional-risk-assessment-for-lithuania/>.

Interested parties were invited to provide written comments on the proposal by the close of business on Friday, 19 February 2021.

3.2 Comments received

Comments on the draft RRA were received from The Westervelt Company Inc. and UAB Graanul Invest and are summarised below.

The Westervelt Company Inc.

- Suggested updating 'Partnership' with 'Program' in SBP's name.
- Suggested considering the addition of a note to the RRA indicating that NEPCon has undergone a name change to Preferred by Nature.
- Questioned whether work performed by NEPCon (Preferred by Nature) in preparation of the original document or in its subsequent review for the purpose of this extension presented a conflict of interest given its role as a Certification Body in Lithuania.
- Confirmation of whether Indicator 1.1.2 was reviewed within 2-5 years, as was proposed on page 13, paragraph 2.
- Annex 2 and Annex 3 responses in the original document should have been translated into English.

UAB Graanul Invest

- Support for extending the validity of the RRA for Lithuania on the basis that the forestry practises and forest law have not changed and the SBP RRA is in good alignment with the current FSC Risk Assessment; allowing for needed stability and uniform mitigation measures in local forestry/wood industry and encouraging small owners to participate in sustainable forestry practises.

3.3 Consideration of comments received

The SBP-endorsed RRA for Lithuania document has been updated to use the correct full name of the SBP certification scheme, and mention made of the name change of NEPCon to Preferred by Nature.

SBP sees no potential conflict of interest with Certification Body (accredited to offer SBP certification services) acting as a Working Body. SBP has a robust process for the development of RRAs, which includes a public stakeholder consultation and technical review by the independent Technical Committee.

The Working Body was explicitly asked to evaluate whether any changes occurred during the last five years to affect the risk designation for Indicator 1.1.2. The Working Body commented that the volume of woodchips from Belarus had increased during last five years. However, the majority is FSC-certified and as such follows strict Chain of Custody certification requirements. Over 95% of forests in Belarus are FSC certified.

SBP will ensure that all future RRA content is translated into English.

4 Internal review

Following the close of the public consultation period, SBP performed an internal technical review of the SBP-endorsed RRA for Lithuania and made few minor changes as described in section 3.3 above. The revised RRA document was then submitted to the Technical Committee (see section 5).

5 Review by the independent Technical Committee

The updated SBP-endorsed RRA for Lithuania together with this response to consultation document were submitted to independent Technical Committee for the final review. The Technical Committee reviewed the reports and recommended approval on 15 June 2021.

6 Approval for extending the validity of the SBP-endorsed RRA for Lithuania

The extension of the validity of the SBP-endorsed RRA for Lithuania was formally approved by SBP CEO on 15 June 2021.

The updated SBP-endorsed RRA for Lithuania was published alongside this document on 17 June 2021.