

SBP

Sustainable Biomass Partnership

SBP Regional Risk Assessment Procedure

www.sustainablebiomasspartnership.org



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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 Framework and to view the full set of documentation see www.sustainablebiomasspartnership.org

Document history

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1 Purpose and scope

- 1.1 This document specifies the requirements and procedures to develop and endorse SBP risk assessments of regions or countries ('Regional Risk Assessments' or RRAs).

2 Appointment of working bodies to conduct Regional Risk Assessments

- 2.1 SBP will appoint a 'working body' (WB) to conduct Regional Risk Assessments (RRAs).
- 2.2 Prior to appointment, SBP will review and confirm that each proposed WB:
 - a) has sufficient, suitably-qualified staff to perform the risk assessment;
 - b) has demonstrated competence with SBP standards; and
 - c) has relevant knowledge of the language, laws and customs of the region(s) in which they will operate.
- 2.3 SBP shall maintain a list of all SBP-approved WBs.

3 Assessment process

3.1 Coordinator

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

3.2 Determination of geographic scope

- 3.2.1 The working body 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 working body 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, e.g., 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, e.g., type of forested area (e.g., plantations, managed forests and natural forests), tenure or ownership (e.g., public, private, corporate, indigenous, and community forests), scope of management (e.g., 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 (i.e. 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 the SBP Feedstock Compliance Standard (SBP Standard 1) as relevant to the region, using the template in Annex 2 of this document.

Note: The risk assessment assesses the risk in the Supply Base and not the management systems in operation at a BP site, which is required in a BP'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 Sufficient 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, e.g., 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. Information sources older than five years should be avoided unless their adequacy can be confirmed.

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

3.4.4 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 in the process.

3.4.5 Data sources shall be referenced in all draft and final 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 (e.g. 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 to be:

- a) 'Low risk', when evidence indicates that the low risk threshold(s) are 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 risk area was identified.
- 3.5.3 The WB may identify new or additional risk factors in a region (e.g. due to national conditions) which have not been specifically identified in SBP indicators. In case of doubts, 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, 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 given 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 The WB shall publicly consult on the Public 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 Coordinator shall identify stakeholders according to Annex 1, and shall invite them to comment on the Public Draft RRA Report. The Coordinator shall ensure that stakeholders from all stakeholder groups listed in Annex 1 are invited to participate.
- 4.3 The Coordinator shall maintain a list of identified stakeholders and their respective contact details.
- 4.4 Stakeholders shall be given a period of at least thirty (30) days to submit comments on the Public Draft RRA Report.
- 4.5 Information sent to stakeholders for consultation shall include the following:
 - a) A brief description of the SBP scheme including direct reference to the SBP Standard #1 version;
 - 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 Public Draft Regional Risk Assessment Report;
 - e) Contact details of the Coordinator;
 - f) An estimated timeline for the completion of the proposed RRA;
 - 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.
- 4.6 The Coordinator shall inform SBP about the start date of the consultation at least three (3) weeks in advance.
- 4.7 The Coordinator shall be proactive in seeking input from representatives of identified stakeholders, including using a variety of means to inform stakeholders, 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 Coordinator should consider holding stakeholder workshops to provide a forum for direct input and discussion.

- 4.9 The Coordinator is responsible for facilitating culturally appropriate outreach to representatives of all identified Stakeholders.
- 4.10 The Coordinator shall acknowledge receipt of comments and their proper collection.
- 4.11 The WB shall review all comments by stakeholders and address them in the Final RRA Report with the goal of achieving consensus, in line with SBP's vision and mission.
- 4.12 The Coordinator shall respond to all stakeholders who participate in the consultation process and indicate how their comments were taken into account, at latest by the release of the RRA for a subsequent consultation period or prior to its submission to SBP for endorsement.
- 4.13 The Coordinator 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;
 - c) An unedited copy of all comments as an Annex to the report.
- 4.14 Stakeholder consultation reports shall be prepared in English however copies of stakeholder comments are not required to be translated from their original language.
- 4.15 Stakeholder consultation reports shall be appended in their entirety to the Final RRA Report, unless specific stakeholders have requested confidentiality in which case their comments shall be treated as confidential material.
- 4.16 SBP will only publish the Final RRA Report on the SBP website after it has been endorsed by SBP (see 6.13). However, if advanced publication is desirable (e.g. in order to communicate about the RRA process with stakeholders), then SBP and WB may agree to allow the WB to make the unapproved version of the report available.
- NOTE: Means of public availability should be determined based on national/regional conditions.
- 4.17 The need for additional consultation periods prior to the development of the Final RRA Report shall be at the discretion of the WB, taking into account the comments received during the public consultation. 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 a minimum two versions of the Regional Risk Assessment Report:
- a) A Public Draft RRA Report to be publicly consulted (according to Section 4), which shall also be sent to SBP for review at least ten (10) days before it is published for public consultation; and
 - b) A Final RRA Report that was 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 Coordinator 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 The WB is responsible for completing an internal review of the Final RRA Report to ensure that it complies with all SBP requirements. SBP will not accept RRA Reports unless they are signed by a duly authorised representative from senior management of the WB.

6 SBP evaluation of Regional Risk Assessment reports

6.1 Report submission

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

6.2 Review by SBP Technical Committee

- 6.2.1 Within ten (10) days of receiving the Final RRA Report, the SBP Executive Director (or designee) will arrange for review by the SBP independent Technical Committee (TC).
- 6.2.2 In the first instance, the TC shall review the report to confirm its adequacy 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.
- 6.2.3 If the TC finds the report to be inadequate according to criteria in 6.4, it will be returned directly to the Coordinator and WB for resolution without any further consideration by SBP.
- 6.2.4 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.
- 6.2.5 If the TC finds the report to be adequate according to criteria in 6.4, the committee will then evaluate whether the risk assessment can be considered accurate and comprehensive. The TC will prepare a brief narrative which justifies their conclusion.
- 6.2.6 Following review, the TC shall make a specific recommendation to the SBP Executive Director as to whether to approve or reject the Final RRA Report.

6.3 Decision by SBP Executive Director

- 6.3.1 The SBP Executive Director (or designee) will review the recommendation from TC and take a decision as to whether:
 - a) SBP endorses the Final RRA Report; or

b) SBP rejects the Final RRA Report.

6.3.2 SBP's decision will be final.

6.3.3 SBP shall communicate the decision to the Coordinator and WB.

6.3.4 In cases where the report is rejected, SBP shall provide the Coordinator and WB with a rationale for rejection and SBP may make suggestions for improvements or revisions.

6.3.5 In cases where the report is endorsed, SBP will publicly announce the RRA and publish it on the SBP website.

6.3.6 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 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 (see RRA Procedure).

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; and
- d) Certificate holders.

2 Social interests

- a) NGOs involved or with an interest in social aspects of forest management and other related operations;
- b) Forest workers;
- 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.

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

- b) Local communities and indigenous peoples' representatives.
- 4 Certification bodies which are actively involved in forest certifications within the country
- 5 National and state forest agencies
- 6 Experts with expertise in Controlled Wood and other relevant feedstock categories
- 7 Research institutions and universities
- 8 Representatives of forestry certification schemes (e.g. 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 Risk Assessment for [Region]” 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 over-view 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
Indicative / Possible Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
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
Indicative / Possible Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorized by the mix of inputs.
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
Indicative / Possible Mitigation Measure	

	Indicator
1.2.1	Legality of ownership and land use can be demonstrated for the Supply Base.
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
Indicative / Possible Mitigation Measure	

	Indicator
1.3.1	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Indicative / Possible Mitigation Measure	

	Indicator
1.4.1	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Indicative / Possible Mitigation Measure	

	Indicator
1.5.1	Feedstock is supplied in compliance with the requirements of CITES.
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
Indicative / Possible Mitigation Measure	

	Indicator
1.6.1	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Indicative / Possible Mitigation Measure	

	Indicator
2.1.1	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.1.2	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Indicative / Possible Mitigation Measure	

	Indicator
2.1.3	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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.1	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimize 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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.2	Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.3	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.4	Biodiversity is protected (CPET S5b).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.5	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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.6	Negative impacts on ground water, surface water, and water downstream from forest management are minimised (CPET S5b).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.7	Air quality is not adversely affected by forest management activities.
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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.8	There is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.2.9	Methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.3.1	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
Indicative / Possible Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.3.3	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Indicative / Possible Mitigation Measure	

	Indicator
2.4.1	The health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.4.2	Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.4.3	There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.5.1	The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected (CPET S9).
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
Indicative / Possible Mitigation Measure	

	Indicator
2.5.2	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"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Indicative / Possible Mitigation Measure	

	Indicator
2.6.1	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
Indicative / Possible Mitigation Measure	

	Indicator
2.7.1	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
Indicative / Possible Mitigation Measure	

	Indicator
2.7.2	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
Indicative / Possible Mitigation Measure	

	Indicator
2.7.3	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
Indicative / Possible Mitigation Measure	

	Indicator
2.7.4	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
Indicative / Possible Mitigation Measure	

	Indicator
2.7.5	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
Indicative / Possible Mitigation Measure	

	Indicator
2.8.1	Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
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 <input type="checkbox"/>
Indicative / Possible Mitigation Measure	

	Indicator
2.9.1	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
Indicative / Possible Mitigation Measure	

	Indicator
2.9.2	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
Indicative / Possible Mitigation Measure	

	Indicator
2.10.1	Genetically modified trees are not used.
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
Indicative / Possible Mitigation Measure	