

**Public Consultation Synopsis - RSB Theory of Change and Impact Indicators**

First name	Last name	Organization	Organization type	Please select if you are a:	Section	document   Section/indicator #   Description of the issue   Background/Reasoning (Optional: Recommended improvements and/or guidance	Additional Information	Follow-up
Arturo	Barrit	Associated Labor Unions-Trade Union Congress of the Philippines (ALU-TUCP)		RSB Member	-	No comments to the substance of the two documents. Well presented as far as the presentation as to wordings of the two documents.	I want a direct reply from RSB Secretariat (all feedback is considered for inclusion in revised versions); I want to receive information about RSB Membership; I want to receive information about RSB Membership and RSB Certification	

Doris	Cellarius	Sierra Club		RSB Member	-	<p>The Theory of Change is a well written description of the improvements we hope we will result from RSB certifications. It is important for RSB to be beginning this process.</p> <p>It has been a bit difficult to know how to respond so my response has taken some thought. I may have gone beyond what you seek, but improving the system can include things like more frequent audits when necessary or changed definitions</p>		General comment - no follow-up
Doris	Cellarius	Sierra Club		RSB Member	Impact indicators	<p>I think it would be important and not too difficult if you could include biomaterials whenever they are produced along with biofuels. There seem to be more of these projects now, and in some case a switching to the uses of a feedstock to other products.</p>		The ToC was updated to include biomaterials

Doris	Cellarius	Sierra Club		RSB Member	Supporting Strategies	<p>RSB and RSB Services education programs are excellent. Certifiers and operators need to understand what the sustainability issues are and “the possible consequences if they are not taken into account (e.g. loss of biodiversity)”. This is particularly true for areas of the world where natural resources are already constrained and sustainability issues are even more important. RSB is strong on social sustainability so I believe it is doing excellent work in this area. There are connections between social sustainability and biodiversity loss when communities lose livelihoods.</p>		General comment - no follow-up
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Doris	Cellarius	Sierra Club		RSB Member	Data Collection System	<p>Data Collection system: It would be easier to comment if we knew more about what the Monitoring and Evaluating System will consist of. You wrote:</p> <p>“In addition, while RSB will be collecting data on all impact indicators (see M&amp;E system report for full list), we have concluded that an assessment of all data will not yield any meaningful results until a greater number of certifications are achieved.”</p> <p>Will there be a comment period on the Monitoring and Evaluating System?</p>		<p>Yes, the Public Reporting System is available on our website (<a href="http://rsb.org/activities-and-projects/monitoring-evaluation/">http://rsb.org/activities-and-projects/monitoring-evaluation/</a>) and you are welcome to provide comments. The forthcoming M&amp;E Report will be distributed to all members following independent evaluation by ISEAL.</p>
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Doris	Cellarius	Sierra Club		RSB Member	Technical Appendix (Impact indicators)	<p>Regarding Technical Appendix - Impact Indicators: I think it would be good to include the Audits as a source of data. I do not see this on the chart.</p> <p>I have been reviewing RSB Services certification audits and have been surprised at the lack of detail as to the problems they identify. It is possible that the information that is not available to the public could still be used for tracking the issue.s</p>		Audit reports are indeed use to collect information for the impact indicators.
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Doris	Cellarius	Sierra Club		RSB Member	Stakeholder Engagement	<p>Regarding stakeholders, I was very pleased to see this statement:          “This multi-stakeholder network can advocate the RSB Standard and raise the awareness in the different sectors and regions of the involved stakeholders.”</p> <p>Having studied some RSB Services certification audits I believe that in some cases there could have been better identification and use of external stakeholders (and this could even include international watchdog organizations if appropriate). This could help develop data on external impacts.</p> <p>Perhaps the definition of stakeholder needs to be expanded. It may be that RSB services required outreach to stakeholders should be broader and more comprehensive.</p>		<p>The first phase of the M&amp;E system will only use audit-related data. In a second phase, RSB will collect additional information to feed into impact indicators through external research. In order to minimise cost, the existing RSB network will be leveraged, especially by looking for collaboration with the academic sector.</p>
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						(Cont.) It is also possible that RSB should make more use of its Multi-Stakeholder Network. The Marine Stewardship Council seems to have broader outreach and opportunities for input from stakeholders. Has such an approach been considered?		
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Doris	Cellarius	Sierra Club		RSB Member	Tracking and Reporting	<p>Tracking and Reporting:</p> <ul style="list-style-type: none"> <li>- The proposed approach is clear and very good but I have a few comments.</li> <li>- I fully support your important plans to track negative consequences and external impacts. "As certification can also have negative results, unintended negative impacts are specified here as well and need to be carefully monitored."</li> <li>- Unintended negative impacts that you have listed and that I believe should be tracked from the very beginning are: <ul style="list-style-type: none"> <li>- Are conflicts and disputes over projects tracked and reported on regularly, including how they are resolved?.</li> <li>- Is there water depletion and pollution of surface and ground water resources due to biofuel operations?</li> <li>- Do biofuel operations contribute to loss of biodiversity?</li> <li>- Do biofuel operations maintain ecosystem services?</li> </ul> </li> </ul>		<p>In the first phase, it is assumed that all certified operators do comply with RSB principles &amp; criteria, i.e. that certified operations do not have the impacts you mention. In the second phase, this assumption will be verified more directly through field research. If it turns out this is not or partially the case, this will be used to reinforce the system.</p>
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						(Cont.) Do the uses of technologies (e.g. GMOs) and management of waste in biofuel operations bring clear environmental and social benefits and are they appropriately monitored?	
David	Reister	Sierra Club		RSB Member	Impact Indicators	<p>There are 37 Impact indicators. Initially the focus is on achieving significant GHG reductions while RSB will be collecting data on all impact indicators.</p> <p>The next step is to assign a value to each of the impact indicators and sum the values to get a value for the process.</p>	Total GHG savings by RSB certified operators are indeed estimated from the very beginning.