RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

RSB Procedure for Risk Management

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Introduction

In the context of RSB certification, risks may exist related to the proper, consistent and transparent implementation of the RSB standards and procedures.

In order to address these potential risks, the RSB certification system is based on a comprehensive risk management approach.

The risk management approach is designed to:

- Identify and address the risks to Participating Operators when implementing RSB requirements;
- Support Participating Operators, Certification Bodies and the RSB Secretariat to focus on those areas of implementation of the RSB standards (and those constituents) which add risk to the RSB certification system;
- Add flexibility by adjusting the audit frequency to the risk class of operators;
- Serve as an incentive to promote accountability among all constituents in the RSB certification system; and
- Enhance the stability and integrity of the RSB certification system.

The risk management approach detailed in this procedure is structured in 4 different stages: identification; assessment; management; and monitoring.

1. *Risk identification* identifies and documents all risk types.
2. *Risk assessment* evaluates and documents the intensity and extent of each risk type, as well as the overall risk to the operation. The main outcome of this stage is the attribution of a risk class to each participating operator, which influences the frequency of audits by certification bodies.
3. *Risk management* is the stage where management strategies and activities are developed, implemented and documented in a risk management plan that addresses and minimises each risk.
4. *Risk monitoring* is the stage where the risk management plan is monitored and assessed continuously.

The risk class determines the frequency of surveillance audits and the period of validity of RSB certificates (See RSB Procedure for Certification Bodies and Auditors (RSB-PRO-70-001).

However, the risk class cannot be validated before the first audit is completed. Thus, if the self-risk assessment result shows *high risk*, the audit team will conduct the first audit based on a *high-risk class*, in all other cases the audit team will apply the *medium risk class*. Following audits will be based on the actual risk class.

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Aim of this procedure

The aim of this procedure is to make sure that Participating Operators identify, evaluate, mitigate and monitor the risk(s) related to their scope of certification while putting in place RSB standards and procedures. These risks include, but are not limited to:

- Risk(s) of non-conformity with RSB standards and procedures;
- Risk(s) to reputation;
- Risk(s) to local communities and ecosystems;
- Risk(s) to the credibility of the RSB due to an inappropriate use of its standards, its certification system and/or its associated trademarks.

These different types of risks may come from the context of operations (e.g. location, ecosystem types, and social dynamics), management systems and the complexity of supply chains (e.g. number of suppliers or number of clients). A proper identification, assessment, management and monitoring of risk will provide substantial benefits, for example by:

- Increasing awareness of risks and mitigating them through improved management systems;
- Reducing the likelihood of non-conformities with RSB standards, which could lead to termination from the RSB certification process;
- Helping auditors to optimise audit processes and costs through a better understanding of the nature and context of operations.

As a result of the risk assessment (**Annex I**), a risk class will be attributed to Participating Operators (low, medium or high). This risk class will determine the period of validity of the certificate and thus, the interval between main audits, as defined in RSB Procedure for Certification Bodies and Auditors (RSB-PRO-70-001).This procedure also describes the actions Participating Operators are expected to undertake in order to minimise and monitor the identified risks.

Scope of this Procedure

This procedure is an international procedure and is valid worldwide for the certification schemes RSB Global, RSB EU RED, RSB Japan FIT and RSB ICAO CORSIA. It sets out the basic elements of a risk management approach for operations producing, converting, processing, blending, trading, using or otherwise handling biomass, non-bio-based waste and processing residues (including flue gas / CO_2), biofuels, advanced fuels and advanced products in the RSB certification system.

This procedure applies to all operators taking part in the RSB certification system (*Participating Operators*).

Version and Date

Version 3.3 of the RSB Procedure for Risk Management shall be effective from 27 May 2021.

Note on Using this Procedure

All parts of this procedure are considered to be normative, including its aim, coverage, effective date, notes on its use, references, terms and definitions, requirements and annexes, unless otherwise stated. When putting this procedure in place the Participating Operator shall make sure that they meet all of the requirements specified in this procedure, and any other measures necessary to achieve its aim.

Terms and Definitions

For the purposes of this procedure, the terms and definitions given in *RSB Glossary of Terms [RSB-STD-01-002]* will apply.

F. Requirements

1. General requirements

1. 1. The Participating Operator shall develop, document and implement a risk management approach, which includes the following steps:

1. 1. 1. *Risk Identification (See Section F.2)*

1. 1. 2. *Risk Assessment (See Section F.3)*

1. 1. 3. *Risk Mitigation (See Section F.4)*

1. 1. 4. *Risk Monitoring (See Section F.5)*

1. 2. It is recommended that the risk management approach is based on ISO 31000:2018

1. 3. The Participating Operator shall provide the name and details of the management representative who has overall responsibility for developing and implementing the risk management approach.

1. 4. The Participating Operator shall ensure and maintain the necessary knowledge, resources, competencies, skills and systems for complying with this procedure. In particular, the management representative who has the overall responsibility for putting the risk management approach in place shall be knowledgeable and competent to do so.

1. 5. The Participating Operator shall include all entities, sites, facilities and employees in the scope of certification, as well as sub-contractors in their risk management approach.

1. 6. Staff responsible for implementing the risk management approach shall be properly trained and qualified.

1. 7. The Participating Operator shall update their risk management system (i.e. risk identification, and/or risk assessment, and/or risk management) periodically, in particular:

1. 7. 1. Before every new audit (main or surveillance);

1. 7. 2. Every time the operations get modified to the extent that some of the responses to the RSB risk assessment tool (Annex 1) would change;

1. 7. 3. Whenever the certification scope is changed;

1. 7. 4. At the Participating Operator`s own initiative.

2. Risk identification

2. 1. The RSB Risk Assessment Tool (Annex 1) identifies the following relevant risks in the context of the RSB certification system:

- Risks related to certification and legal history
- Risks related to the management system
- Risks related to the supply chain
- Risks related to the governance performance
- Risks related to environment (deforestation, water)
- Risks related to labour conditions and other social issues

2. 2. The operator shall use the RSB Risk Assessment Tool to identify risks.

Please note: The operator is not allowed to use alternative approaches to identify risks, however, the operator may go beyond the aspects addressed by the RSB Risk Assessment Tool.

3. Risk Assessment

3. 1. The Participating Operator shall conduct a self-risk assessment using the RSB Risk Assessment Tool (Annex 1) and determine their risk class (Low, Medium or High).

For multi-site certifications, i.e., whenever the scope of certification covers more than one entity or site, the following options are available:

- The PO may fill in the RSB Risk Assessment Tool once, covering all entities in the scope of certification. In this case the highest risk of all entities in the scope of certification shall be applied for each question.
  Example: A scope of certification covers 3 industrial sites, of which only one is located in an area with high water stress: The operator shall assign the "high risk" category for the entire certification scope
- The risk category may also be calculated individually for each site in the certification scope. In this case, the risk class attributed to the PO shall not be lower than any of the individual risk classes of the sites in the certification scope.

3. 2. The Participating Operator shall inform the certification body immediately about any changes to their self-risk assessment.

Note on the evaluation of self-risk assessment by the certification body:

The auditors conducting the audit of a Participating Operator's operations will check compliance with this procedure and the accuracy of their self-risk assessment and risk class.

The risk class determines the frequency of surveillance audits and the period of validity of RSB certificates (See *RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001]*).

Nevertheless, the risk class cannot be validated before the first audit is completed. Thus, if the self-risk assessment result shows high risk, the audit team will conduct the first audit based on a *high risk class*, in all other cases the audit team will apply the *medium risk class*. As part of the audit, the audit team will evaluate the results of the self-risk assessment. After the audit, the risk class of the operator will be adjusted based on the audit results.

The Participating Operator may update the self-risk assessment at their own discretion. However, the results shall be formally validated by the certification body.

4. Risk Management

4. 1. The Participating Operator shall develop and implement a risk management plan to minimise each type of risk identified and assessed (Section F.2 and F.3, i.e., the risk management plan shall cover all issues in the *High Risk* and *Medium Risk* Categories in the RSB Risk Assessment Tool). The Participating Operator shall acknowledge these risks and develop a risk management plan to minimise them, including priorities and timelines, in line with the approaches outlined below. The risk management plan may be a part of the

Environmental and Social Management Plan (ESMP), whenever the RSB Principles & Criteria are applicable to the PO scope. The risk management plan shall include activities based on, but not limited to the following approaches:

4. 1. 1. Avoidance: exit the activities creating the risk;

4. 1. 2. Substitution: replace the activities creating the risk with other activities providing comparable outputs with lower risk;

4. 1. 3. Reduction: take action to reduce the likelihood or impact related to the risk;

4. 1. 4. Compensation: offset the risk through activities that compensate for negative impacts (e.g. financial mechanisms, insurance);

4. 1. 5. Acceptance: Acknowledgement of risk. The Participating Operator may choose to not take action, if the consequences in this risk class are acceptable and lack of action does not prohibit compliance with the RSB Principles & Criteria.

4. 2. The risk management plan shall cover all risks that have been identified for each site.

   A risk management plan is mandatory for the risks that have been identified and assessed through the RSB Risk Assessment Tool

   Please note: If all issues addressed by the RSB Risk Assessment Tool have a "low risk" category, a risk management plan is optional.

4. 3. The risk management implemented by the operator may lead to reduced risk values in the RSB Risk Assessment Tool.

   For example, the operator may decide to address the supply chain risks by implementing oversight mechanisms for suppliers that are included in the scope of certification. Evidencing the implementation of such a mechanism allows the operator to adjust the risk category.

   Risks related to external factors (for example the socio-economic context or the water stress in the region) may also be reduced by the implementation of risk management practices. Evidence on how the risk is addressed by the operator and records of the implementation of risk management activities shall be available for the auditor to verify.

Operators may use the risk management template in the annex of this procedure (the use of the template is optional, operators may also use other systems if they wish).

5. Risk Monitoring

5. 1. The Participating Operator shall continuously monitor the effectiveness of the risk management plan in minimising the risks identified associated with their operations in the scope of certification (See Section F.2).

5. 2. The Participating Operator shall update and optimise the risk management plan according to the results of the risk monitoring.

5. 3. Where relevant, the following disclaimer may be used in any communication and/or in the documentation attached to RSB compliant products:

A risk class is attributed to every operator involved in the RSB certification process in order to reflect upon the contextual elements (e.g. supply chain, country's socio-economic situation, direct environment, etc.), which might make the process towards RSB certification more demanding or difficult. The risk class of an operator should not be considered as an indicator of its level of compliance with the RSB Standard.

Annex I: RSB Risk Assessment Tool

Please note: Whenever any answers result in a *High* or *Medium* risk category, risk management strategies and a risk monitoring system have to be developed and presented to the auditor.

A. Certification and Legal History

This section shall be answered by all operators applying for certification

A.1 Have you in the last 3 years been refused by another scheme or has a certificate been immediately suspended or withdrawn because of a non-conformity under the RSB or any other certification scheme?

Answer	Risk Category	Points
Yes. It was due to one or more severe major non-conformities (severe major non-conformities include non-conformities such as fraud, child labour, forced labour, deforestation, etc)	High	15
Yes. It was due to non-conformities that are not classified as severe major non-conformities. The non-conformities have been rectified.	Medium	3
No	Low	0

A.2 Do you currently or in the past 3 years have pending legal/judiciary action related to issues covered by the RSB Principles & Criteria indicating non-compliance with the RSB requirements within the operations in the certification scope (e.g. labour rights, environmental aspects)?

Answer	Risk Category	Points
Yes	High	15
No	Low	0

A.3 Has a grievance ever been filed against your organisation in reaction to a previous RSB audit?

Answer	Risk Category	Points
Yes. The original audit results were modified by the Certification Body as a result of the grievance process.	High	5
Yes. The original audit results did not need to be modified.	Medium	3
No	Low	0

B. Management system

This section shall be answered by all operators applying for RSB certification

B.1 Is there an internal auditing system implemented that regularly assesses compliance with applicable RSB requirements (e.g. Chain of Custody, health and safety, environmental aspects etc.) covering all operations in the scope of certification ?

Guidance: Key elements of the internal auditing system shall be: The internal auditor is a trained professional who provides independent and objective assessments, final reports that are presented to the senior management.

Answer	Risk Category	Points
We do not have an internal auditing system implemented for all operations in the scope	High	5
We have an internal auditing system implemented for part of the operations in the scope	Medium	3
We have an internal auditing system that covers all operations in the certification scope	Low	0

B.2 Collection and processing of relevant data (GHG LCA input data, process yield data, sales information, etc.) is carried out based on a documented procedure that is consistently applied by all operators in the scope of certification

Please note: Operators in the scope of certification may either have own documented procedures or apply the documented procedure as developed by the Participating Operator and circulated to all entities in the scope of certification

Answer	Risk Category	Points
Some or all operators in the scope of certification do not apply a documented procedure to collect and process all relevant data	High	5
All operators in the scope of certification apply documented procedures to collect and process relevant data, but the procedures differ between operators	Medium	3
All operators in the scope of certification apply documented procedures to collect and process data consistently	Low	0

C. Supply Chain

This section shall be answered by all operators applying for RSB certification

C.1 Does your scope of certification include suppliers (for example raw material producers)?

Answer	Risk Category	Points
Yes, and our company does not have oversight / control of the operations of our suppliers	High	10
Yes, however our company maintains oversight/control of the operations of our suppliers.	Medium	3
No, the scope of certification does not include suppliers	Low	0

Guidance: This question refers to raw material producers or other suppliers that are part of your certification scope. If you only receive material from certified suppliers, the risk category is "low". In this context, "oversight" means that your company has the right to monitor and/or visit supplier production sites to verify agreed upon practice guidelines, in particular related to the implementation of RSB sustainability requirements and chain of custody controls.

C.2 Do you trade materials that are certified against multiple systems (i.e. materials carrying several claims, e.g., RSB and ISCC)?

Answer	Risk Category	Points
Yes and the sustainability claims (e.g. ISCC and RSB) are recorded in separate inventory systems	High	5
Yes and the sustainability claims (e.g. ISCC and RSB) are recorded in the same accounting system	Medium	3
Yes the sustainability claims (e.g. ISCC and RSB) are recorded in one overarching inventory system and audited in one combined audit, or RSB auditors review the entire traceability dataset of certified claims in the audit	Low	0
No, I do not trade materials certified against another system than the RSB	Low	0

Guidance: Whenever materials are certified against several certification systems, a potential risk for double counting has to be mitigated. Having one overarching inventory (mass balance) system that shows material inputs and outputs for all certification systems is a crucial element to mitigate the risk of double counting.

D. Governance performance

This section shall only be answered by biomass producers and industrial facilities applying for RSB certification

D.1 Are the operations included in your scope of certification located in a country with a weak governance performance estimate as documented by the Worldwide Governance Indicator (WGI)?

Assessment steps:

- Go to: https://info.worldbank.org/governance/wgi/Home/Reports
- Select Indicators *Voice and Accountability*, *Political Stability and Absence of Violence / Terrorism* and *Control of corruption*
- Select countries of the entities that are included in your certification scope and the most recent dataset year
- View results in "Table view"

Please fill below table for estimates of governance (ranges from approximately -2.5 (weak) to 2.5 (strong) governance performance) for each country in the scope of certification

Country of operation	Indicator: Voice and Accountability	Indicator: Political Stability and Absence of Violence / Terrorism	Indicator: Control of corruption	Dataset year

Answer	**Risk Category**	**Points**
Yes, one or all operations in the scope of certification are located in a country with a score of -1.0 or below in any of the three indicators	High	5
Yes, one or all operators in the scope of certification are located in a country with score above -1 but below 0 in any of the three indicators	Medium	3
No, all operations are located in countries that have a score of at least 0.	Low	0

This risk indicator allows for an adjustment of the risk value by the means of risk management measures The operator may decrease the risk by one category, i.e. operators with a high risk may downgrade to medium and operators with a medium risk may downgrade to low risk	
Measures undertaken to mitigate risks related to weak governance performance Please note: All indicators with a score below 0 must be addressed through the risk mitigation measures in order to downgrade the risk category	List activities here: Examples: Anti-corruption programs
Available evidence	List available evidence here
New risk category	Indicate mitigated risk category here

Background information:

The Worldwide Governance Indicators (WGI) reports aggregate governance indicators for over 200 countries and territories for six dimensions of governance by country, based upon publicly available data sources, NGOs, international organizations, survey institutes and private sector firms.

Voice and Accountability captures perceptions of the extent to which a country`s citizens are able to participate in selecting their government, as well as freedom of expression, freedom of association, and a free media. Sources include human rights and freedom of press indices
Political Stability and Absence of Violence / Terrorism measures perceptions of the likelihood of political instability and / or politically motivated violence, including terrorism. Sources include also ethnic, religious or regional conflicts as well as social conflicts such as conflicts related to land
Control of corruption captures perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as “capture” of the state by elites and private interests.

E. Environment – Deforestation and Soils

This section shall only be answered whenever biomass producers (incl. agricultural residues) are part of the certification scope

E1. Estimate the risk of commodity-driven deforestation in the regions in which the operations included in the scope of operation are located.

Please note: The region may be defined flexibly based on the locations of the operators in the scope of certification, i.e. if farms are spread across an entire country, the region shall be the country level, if farms are spread only over a smaller area, a lower administrative level of a country can be applied (e.g. departments, counties, etc.)

Answer	Risk Category	Points
High deforestation risk	High	5
Medium deforestation risk	Medium	3
Low deforestation risk or the operations in the scope of certification do not use agricultural feedstock nor agricultural residues	Low	0

You may use the Global Forest Watch database, if you wish to use other tools, please contact the RSB Secretariat: Go to the website Global Forest Watch (https://www.globalforestwatch.org) and select “map” in the menu

- Select “tree cover loss by dominant driver” in “Forest change”
- Click on the relevant country and select “Analysis”
- Compare the dominant drivers for deforestation

Countries of operation	Average total tree cover loss 3 years preceding certification	Average tree cover loss due to commodity driven deforestation	Commodity driven deforestation relative to total deforestation	Dataset years

- Commodity driven deforestation relative to the total deforestation is less than 10% relative to the total annual tree cover losses of the country: Low risk
- Commodity driven deforestation relative to the total deforestation is 10% to 25% relative to the total annual tree cover losses of the country: Medium risk
- Commodity driven deforestation relative to the total deforestation more than 25% relative to the total annual tree cover losses of the country: High risk

This risk indicator allows for an adjustment of the risk value by the means of risk management measures The operator may decrease the risk by one category, i.e. operators with a high risk may downgrade to medium and operators with a medium risk may downgrade to low risk	
Measures undertaken to mitigate risks related to deforestation	List activities here: Examples: - As part of Principle 7, the operator implements procedures for farms to join the scope of certification which include the assessment of the land status 1 January 2008
Available evidence	List available evidence here
New risk category	Indicate mitigated risk category here

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F. Environment - Water

F.1. Are the operations included in the scope of certification located in a region with medium, high or extremely high water stress?

Please note: The water stress measures the ratio of total water withdrawals to available renewable water supplies. Here, region shall be defined based on the catchment area in which the operators are located.

Answer	Risk Category	Points
Yes, water stress is extremely high or high	High	5
Yes, water stress is medium	Medium	3
No, operations are not located in region with water stress	Low	0

You may use the WRI Aqueduct Water Risk Atlas, but it is not an RSB requirement for operators to use this tool:

- Go to the WRI website and select the Aqueduct Water Risk Atlas: https://www.wri.org/aqueduct
- Select the indicator "Water Stress" and view the results for the countries that the operators of your scope of certification are located in
- View the results for baseline water stress as well as for future water stress

This risk indicator allows for an adjustment of the risk value by the means of risk management measures The operator may decrease the risk by one category, i.e. operators with a high risk may downgrade to medium and operators with a medium risk may downgrade to low risk	
Measures undertaken to mitigate risks related to water stress	List activities here: Examples: - As part of Principle 9, the operator implements procedures to avoid the extraction of water in areas with water stress

Available evidence	List available evidence here
New risk category	Indicate mitigated risk category here

G. Labour Conditions and Other Social Issues

This section shall only be answered by biomass producers and industrial facilities applying for RSB certification

G.1 Have you had a worker's strike in the past year on one or more sites included in your scope of certification or is there any other indication that workers are very dissatisfied with their working conditions?

Answer	Risk Category	Points
Yes	Medium	3
No	Low	0

G.2 Do you have migrant workers working in your operation sites?

Answer	Risk Category	Points
Yes	Medium	5
No	Low	0

Guidance: Migrant workers are defined as casual and unskilled workers who move about systematically from one region to another offering their services on a temporary, usually seasonal, basis.

G.3 What is the safety performance of the operators included in the scope of certification?

Answer	Risk Category	Points
Poor safety performance	High	5
Medium safety performance	Medium	3

Good safety performance	Low	0

Guidance: You may use the indicator Lost time injury frequency rates (LTIFR) and compare your result to your industry average but it is not an RSB requirement for operators to use this indicator:

- LTIFR is a proxy measurement for safety performance.
- A lost-time injury is something that results in a fatality, permanent disability or time lost from work. It could be as little as one day or shift
- LTIFR refer to the number of lost-time injuries within a given accounting period, relative to the total number of hours worked in that period: LTIFR = Number of lost time injuries in accounting period / Total hours worked in accounting period * 1,000,000)
- This website offers an online calculator as well as the data on industry averages for Australia: https://www.safeworkaustralia.gov.au/statistics-and-research/lost-time-injury-frequency-rates-ltifr

Total Score	

Calculation of your risk class:

Score is below 10: **Low Risk**	Score is between 10 and 20: **Medium Risk**	Score is above 20: **High Risk**

Guidance: your risk class gives an indication of the conditions in which you are operating and the required efforts to bring your operations to compliance with RSB Standard. A high risk class means that the conditions of your operations are more challenging. This is why operators with higher risk classes will be audited more frequently (See Annex II).

However, your risk class may not reflect your level of performance vis-à-vis the RSB standard and your chances to receive RSB certification. Operators with a high risk class may achieve RSB compliance just as well as operators with lower risk class.

Note: the scoring system will be re-evaluated within 6-12 months following the approval of this document.

Annex II – Risk Management Template

Risk Identification		Risk Analysis		Evaluation		Treatment Plan		Review	
Description of Risk	How does it affect the achievement of the RSB objectives	Probability	Conse-quence	Rating	Priority	Treat-ments	Responsi-bilities	Schedule	Effective-ness of treatment

Annex III – History of changes

Main changes from the previous version (Version 3.2)

a. The RSB Risk Assessment Tool now allows that risk management measures implemented by the operator reduces the risk values
b. The RSB Risk Assessment Tool has been updated
c. Clarifications throughout the document

Main changes from the previous version (Version 3.1)

d. This procedure is now applicable to all RSB certified operators in RSB Global, RSB EU RED and RSB ICAO CORSIA supply chains.
e. It has been clarified throughout the document that issues identified through the risk assessment tool have to be addressed by the operator.
f. The requirement to send the risk assessment to the RSB Secretariat has been removed.
g. The RSB Risk Assessment Tool has been updated.

Main changes from the previous version (Version 2.0)

h. Based on feedback from experts, participating operators and certification bodies, this procedure was shortened and simplified. While the requirements to implement a risk management approach (with risk identification, assessment, management and monitoring as its 4 main components) remain unchanged, unnecessary complexity and duplication was removed.
i. The purpose of the procedure detailed in the introduction was expanded to explain the relationship between risk management and the integrity and stability of RSB certification system, as well as the benefits of the approach to in helping to ensure the overall viability of participating operators and in optimizing the audit the costs of audits.
j. The risk assessment process itself was improved by replacing the complex calculation, based on a large number of weighted risk factors, by a simpler calculation requiring fewer inputs. This allowed for the simplification, and removal of several ambiguous questions from the questionnaire (Annex 1). This makes the risk assessment more focused, efficient and less prone to diverse interpretations.
k. Risk classes were reduced to three, (“low”, “medium” and “high”), as the previous system (6 risk classes) proved unnecessarily complex.
l. Given the fact that 1) the planning and conditions of an audit is partly determined by the results of the self-risk assessment; and 2) the results of the self-risk assessment can only be validated upon completion of the first audit, it is suggested that the first audit is planned and implemented based on a “Medium” risk class. At the end of the first audit, the auditors will validate the actual risk class. The following audits will be conducted according to the actual risk class.
m. This procedure was entirely re-written using the “plain English” approach, which aims to make the content clearer to a broad audience
n. The numbering was updated.
o. Annex 2 had been replaced by the reference to RSB-PRO-70-001 Requirements for Certification Bodies and Auditors.


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