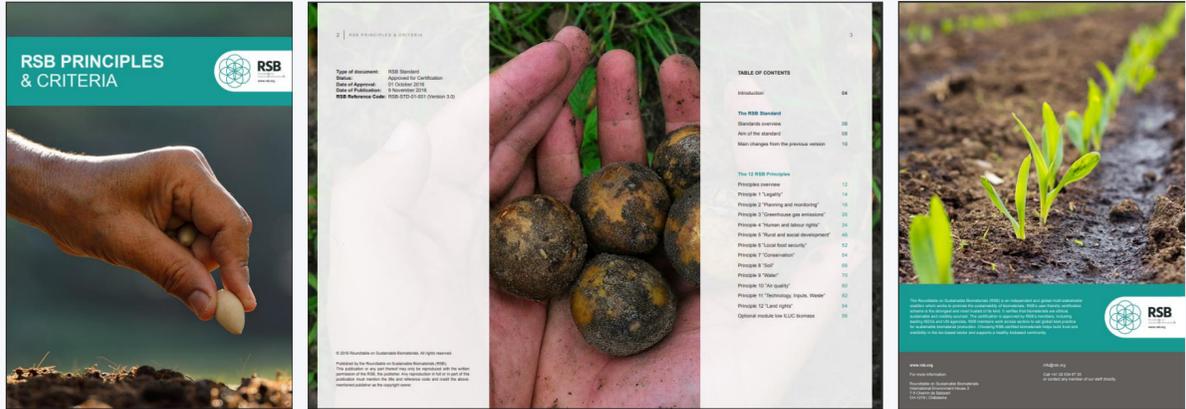


# RSB PRINCIPLES AND CRITERIA

## Revision Process 2022

Input for SWG and AoD approval and feedback



## IN THIS DOCUMENT YOU WILL FIND:



### INTRODUCTION

A brief description of the revision process and its timeline for the Standard of Principles and Criteria.



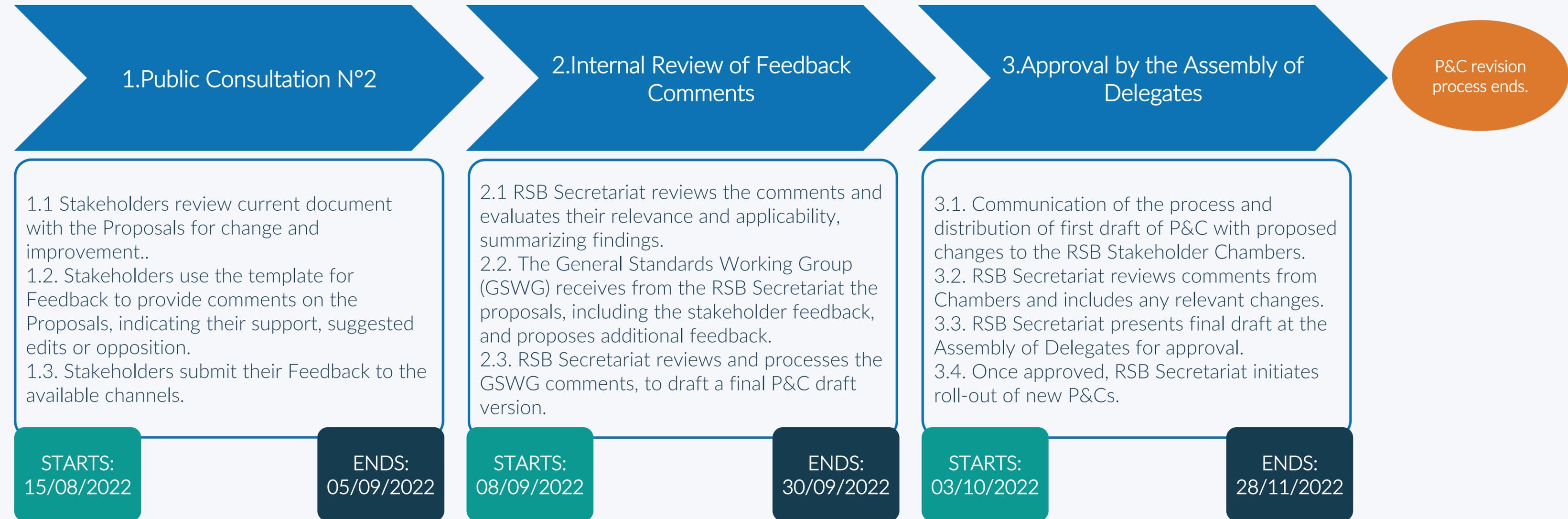
### PROPOSALS FOR IMPROVEMENT

A detailed review of each improvement proposal at different levels of the P&C Standard (i.e., Principles, Criteria, Minimum Requirements, Guidelines, etc.), based on the 1<sup>st</sup> Public Consultation and on internal knowledge.

Clarifying Comment:

- After reviewing this document, there is a word document template which is to be used to: 1. support; 2. propose changes, or; 3. Oppose the improvements developed in this document.
- Once the template is completed, submit to the RSB contact details provided on the communication piece.

## Timeline and description of P&C revision activities



<b>P&amp;C ID (Who?)</b>	Criteria P1. Operations shall comply with all applicable laws and regulations of the country in which the operation occurs and with relevant international laws and agreements.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Add Minimum Requirement	RSB already has in place a set of indicators which need to be referenced by the P.O. and cross checked to national laws and regulations so as to assure different types of rights are in place. To that end, P.Os need additional guidance when located in regions where national indicators have already been developed.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°1</u></b>                      Add a new minimum requirement                      Criterion 1.2.1: The operators shall verify the RSB checklist tool to identify country-specific indicators and guidance for country-specific implementation.</p> <ul style="list-style-type: none"> <li>- P.O.s operating in countries not included in the checklist tool are not exempt from complying with local laws and regulations.</li> <li>- The use of the country-specific indicators and guidance indicated in the checklist does not exempt operators from checking additional laws and regulations and keeping up to date.</li> <li>- The RSB checklist tool is available to Operators upon request.</li> </ul>	Current RSB checklist. No need for additional verification procedure.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria P1. Operations shall comply with all applicable laws and regulations of the country in which the operation occurs and with relevant international laws and agreements.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve Wording	What happens if the local law is more or less stringent than the RSB P&C or requirements? In some cases, it might happen that the RSB goes above and beyond the local law - for example with local labour laws and access to Unions etc.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°2</u></b></p> <p>If there is a difference between applicable law and the RSB requirements, RSB expects a PO to conform with whichever is more stringent.</p>	Current RSB checklist. No need for additional verification procedure.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 2a. Operations shall undertake an impact assessment process to assess impacts and risks and ensure sustainability through the development of effective and efficient implementation, mitigation, monitoring and evaluation plans.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve P&C wording.	As currently worded, the Criterion proposes what actually are two separate steps, which might lead to an unclear interpretation of it. More clarity is needed.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°3</b>                      Suggestion to split 2a into two separate criteria:  <b>A:</b> Operations shall undertake an impact assessment process to assess impacts and risks  <b>B:</b> Operations shall ensure sustainability through the development of effective and efficient implementation, mitigation, monitoring and evaluation plans.</p>	CB verify the existence of an impact assessment process and an impact assessment output (e.g. report). CBs verify the existence and effective implementation of a mitigation, monitoring and evaluation plan.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 2a. Operations shall undertake an impact assessment process to assess impacts and risks and ensure sustainability through the development of effective and efficient implementation, mitigation, monitoring and evaluation plans.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	- Reword Criterion 2a -	Lack of requirements / criteria specifying continuous improvement.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°4</b> Add a new criterion related to continuous improvement</p> <p>Change 2.a criterion wording: Operations shall undertake an impact assessment process to assess impacts and risks and ensure sustainability through the development of effective and efficient implementation, mitigation, <b>progress</b> monitoring and <b>improvement</b> plans.</p> <p>Clarify 2.a.1: 1. Where an impact assessment is required by national, regional, or local laws, the process <b>may</b> be integrated with the RSB impact assessment process to avoid duplication of efforts, but the higher and more comprehensive standard shall be applied.</p> <p>Add new Minimum Requirement 2a.6: <b>Operators shall develop an improvement plan. (Classified as Minimum requirement)</b> Add new Minimum Requirement 2a.10: <b>Operators shall ensure the improvement plan is implemented by providing evidences during the surveillance audits. (classified as Progress requirement)</b></p>	CBs shall verify the monitoring and improvement plan.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Principle 2. Planning, monitoring, and continuous improvement
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Internal support resource.	Update internal support resource	<p>Update information in the “Impact Assessment Guidelines (RSB-GUI-01-002-01” document. The RSB Guidelines on Water Rights and Social Impacts” no longer exist and it is mentioned in the Impact Assessment Guidelines (RSB-GUI-01-002-01”, which is referred to in the P2.</p> <p>The “Impact Assessment Guidelines (RSB-GUI-01-002-01” does not mention the Rural and Social development guideline.</p>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°5</b></p> <ul style="list-style-type: none"> <li>- Exclude from the list (page 3, RSB-GUI-01-002-01)</li> <li>- Include the “Rural and Social Development Guideline” in the list (page 3, RSB-GUI-01-002-01)</li> </ul>	Impact Assessment Guidelines (RSB-GUI-01-002-01) are effectively modified.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Minimum Requirement (M.R.) 2a.6. Operations shall undertake an impact assessment process to assess impacts and risks and ensure sustainability through the development of effective and efficient implementation, mitigation, monitoring and evaluation plans.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording.	Particularly in Minimum Requirement 2a.6.: - RSB-GUI-01-002-05 no longer exist. - Progress requirements are not clear. The criterion needs to have updated wording to align to the current availability of guidelines.. • -The RSB-GUI-01-002-01 does not indicate the progress required for each of the Principles / Criterion, as mentioned in the 2a.6 criterion.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°6</b></p> <ul style="list-style-type: none"> <li>- Replace by “in accordance with the Impact Assessment Guidelines (RSB-GUI-01-002-01)” and remove the old document from the <a href="#">website</a>. Please note that the Checklist shall also be updated.</li> <li>- Prepare a list of progress requirements for each Principle (or at least key social and environmental aspects)</li> </ul>	The documentation is effectively corrected / updated.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 2b. Free, Prior & Informed Consent (FPIC), where applicable, shall form the basis for the process to be followed during all stakeholder consultation, which shall be gender sensitive and result in consensus driven negotiated agreements.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve Wording	An improved definition for FPIC needs to be included, which articulates with stakeholder consultation process. Important terminology needs to be included so as to make the Criterion clearer.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°7</u></b>            Suggest to improve wording to:            A stakeholder engagement and consultation process shall be put in place to address claims and concerns, with the scope of the consultation relevant to the scope of the operation, and where applicable, Free, Prior &amp; Informed Consent (FPIC) shall form the basis for the process to be followed during all stakeholder consultation, which shall be gender sensitive and result in consensus driven negotiated agreements. Disregarding FPIC based consultation on the grounds of not being relevant, has to be demonstrated.</p> <p>Include the definition as a note. Suggest using the FAO definition.            - Definition from FAO: Free, Prior and Informed Consent (FPIC) is a specific right that pertains to indigenous peoples and is recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to a project that may affect them or their territories. Furthermore, FPIC enables them to negotiate the conditions under which the project will be designed, implemented, monitored and evaluated. This is also embedded within the universal right to self-determination.</p>	The P.O. has incorporated a stakeholder engagement and consultation process, which contains FPIC as a basis in relevant locations.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 2b. Free, Prior & Informed Consent (FPIC) shall form the basis for the process to be followed during all stakeholder consultation, which shall be gender sensitive and result in consensus driven negotiated agreements.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. External resource.	- Use the FAO checklist developed for FPIC	<ul style="list-style-type: none"> <li>The screening tool does not address any question directly related to FPIC and RSB does not provide guidance on how this criterion should be addressed.</li> </ul>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°8</b></p> <p>- Use the FAO checklist as baseline (no need to address all questions). FAO checklist saved here: <i>Standards\Standard Development\RSB-STD-01-001 (P&amp;Cs)\Consultation 2021-2022\P2\IR - FPIC_package_FAO.zip\FPIC package documents\FPIC Manual</i></p> <p>- Suggestion: For those answers indicated as “no” in the FAO checklist tool, PO shall provide a planning and improvement mechanism to better cover the FPIC aspect.</p>	<p>- An updated version of the RSB screening tool including questions identified by FAO.</p>	<p><b>28/11/2022.</b></p>

<b>P&amp;C ID (Who?)</b>	Criteria 2d. Biofuel operators shall make adequate resources available to ensure compliance with the RSB standard
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording to include all operator types	This criteria should be open to all operators types, and not only be circumscribed to the ones in the biofuel sector

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°9</u></b>  <del>Biofuel</del> (remove / change to:) Operators shall make adequate resources available to ensure compliance with the RSB standard</p>	Current RSB checklist. No need for additional verification procedure.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Principle 3. Biofuels contribute to climate change mitigation by significantly reducing lifecycle GHG emissions as compared to those of fossil fuels.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve scope	This Principle refers only to biofuels. The standard would be more encompassing and robust if it also mentions bioproducts and makes mention to the Standard for Advanced Products.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°10</b>                      Suggestion to re-word to:  <del>Biofuel</del> <b>The bio-based and circular economy</b> contributes to climate change mitigation by significantly reducing lifecycle GHG emissions as...</p>	Follow the GHG emission methodology defined in the Standard for Advanced Products	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 3a. Biofuels shall meet all applicable GHG reduction requirements set by national and/or regional and/or local regulations
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Avoid redundancies.	This Criteria refers to legal requirements – which are already covered by P2 and are also more extensively developed in Criteria 3.b. “Lifecycle GHG emissions of biofuel shall be calculated by using system boundaries from Well to Wheel, including GHG emissions from land-use change, including, but not limited to above and below-ground carbon stock changes and incentivising the use of co-products, residues and waste in such a way that the lifecycle GHG emissions of the biofuel are reduced”. The standard can avoid duplicating verification and auditing duplications.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<b><u>PROPOSAL N°11</u></b> Suggestion to remove 3.a entirely.	n/a	28/11/2022.

<b>P&amp;C ID (Who?)</b>	<p>Criteria 3b. Lifecycle GHG emissions of biofuel shall be calculated by using system boundaries from Well to Wheel, including GHG emissions from land use change, including, but not limited to above- and below-ground carbon stock changes and incentivizing the use of co-products, residues and waste in such a way that the lifecycle GHG emissions of the biofuel are reduced.</p>
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve scoping and wording	The standard’s scoping can be improved to cover the full scope of RSB certification, where when “biofuel” is referred to, a broader concept such as “certified materials & fuels” could be used.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°12</b>                      - Lifecycle GHG emissions of <b>biomaterials</b> shall be calculated by using system boundaries from <b>cradle-to-grave, including GHG emissions from</b> land use change, including, but not limited to above- and below-ground carbon stock changes and incentivizing the use of co-products, residues and waste in such a way that the lifecycle GHG emissions of the biofuel are reduced. <b>RSB-STD-01-010-RSB Standard for advanced fuels_2.4 and 18-12-11_RSB-STD-02-001-v2.0 RSB Standard for Advanced Products</b> should be used as reference.</p>	<p>Verify the use of RSB-STD-01-010-RSB Standard for advanced fuels_2.4 and 18-12-11_RSB-STD-02-001-v2.0 RSB Standard for Advanced Products with their respective requirements.</p>	<p>28/11/2022.</p>

<b>P&amp;C ID (Who?)</b>	Criteria 3b. Lifecycle GHG emissions of biofuel shall be calculated by using system boundaries from Well to Wheel, including GHG emissions from land use change, including, but not limited to above- and below-ground carbon stock changes and incentivizing the use of co-products, residues and waste in such a way that the lifecycle GHG emissions of the biofuel are reduced.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording.	Simplify wording and make applicable to all certification scopes. Make P3b less specific because the details on scope and boundary are then given in the relevant scope standard, e.g. Advanced Fuel, Advanced Products, EU RED etc.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°13</b>                      Change wording to:                      Criteria 3b. Lifecycle GHG emissions of biofuel shall be calculated by using system boundaries from Well to Wheel, including GHG emissions from land use change, including, but not limited to above- and below-ground carbon stock changes and incentivizing the use of co-products, residues and waste in such a way that the lifecycle GHG emissions of the biofuel are reduced.</p>	No change.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	M.R. 3b.1 The PO shall report the lifecycle GHG emissions of the biomass...
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Update and improve wording.	Update the methodologies accepted by RSB and remove the tools indicated in the current version, considering biograce no longer recognised by the EU RED commission and specifics need to be removed in order to refer to the relevant certification scope.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°14</b>                      The Participating Operator shall report the lifecycle GHG emissions of the biomass, intermediary or final product by applying the RSB GHG Calculation Methodology applicable to the certification scope. <del>(RSB-STD-01-003-01), or the EU Renewable Energy Directive (EU-RED) Methodology, or the ICAO CORSIA Methodology.</del> PO might use the RSB GHG Calculation Tool or carry out an individual calculation as long as the RSB-STD-01-003-01, EU RED, and/or ICAO CORSIA methodologies are used.</p>	Same as the one currently used for GHG verification.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	M.R. 3.b.1. Default values set by the EU Renewable...
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Update numbering</li> <li>Add a M.R. (3b.3)</li> </ul>	<p>3b.2 instead of 3b.1 on page 28. An update is also required in the next numbering.</p> <p>3b.3 Add a criterion to reflect the RSB ICAO CORSIA Std.</p>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°15</b></p> <p>3b.2. Participating Operator applying for RSB Global or RSB EU RED scheme might use disaggregated default values set by the EU Renewable Energy Directive, Annex V (2009/28/EC), <a href="#">Section D</a>, if the specifications as defined by the Directive are met (e.g. feedstock, process, process energy, country of origin).</p> <p>3b.3. Participating Operator applying for RSB ICAO CORSIA might use default values set by ICAO CORSIA published in the ICAO document entitled "CORSIA Default Life Cycle Emissions Values for CORSIA Eligible Fuels" which is available on the ICAO CORSIA website.</p>	n.a.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	M.R. 3b.1. Default values set by the EU Renewable...
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Improve wording and update the rules for further methodologies</li> </ul>	<p>Currently, further methodologies might be accepted following an approval by the RSB Board of Directors under the following conditions: "the RSB membership has been consulted and comments have been considered". This can be a long process. For higher effectiveness, it is suggested the RSB Secretariat, and the Board of Directors decide if a feedback from members is required.</p>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°16</u></b>            Further methodologies following an approval by the RSB Board of Directors under the following conditions:</p> <ul style="list-style-type: none"> <li>the decision is based on a sensitivity analysis carried out by an independent and competent organization</li> <li>the RSB <b>secretariat</b> has been consulted and comments have been considered</li> </ul> <p>In the case that the Secretariat believes a sensitivity analysis is not necessary (e.g. if a calculator is similar to another calculator that is already approved), the Board of Directors may approve the calculator without conducting a sensitivity analysis <b>if the membership does not raise any objections to this approach."</b></p>	n.a.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	M.R. 3b.2. Operators shall use the RSB GHG Methodology (RSB-STD-01-003-01) or the UK's Ofgem Solid and Gaseous Biomass Calculator Tool <sup>7</sup> for supply chains using the following
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Update wording.</li> </ul>	The new RSB requirements for woody biomass shall be mentioned in the P&C and the text should reflect the new RSB requirements for woody biomass.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°17</b>  <b>Update the 3b.2 text:</b>                      Operators shall use the RSB GHG Methodology (RSB-STD-01-003-01) or the UK's Ofgem Solid and Gaseous Biomass Calculator Tool, <b>and comply with the RSB requirements for woody biomass (RSB-SA-01)</b>, for supply chains using the following:</p> <ul style="list-style-type: none"> <li>- Forestry harvesting residues: <b>treetops; branches; barks; damaged, dying or dead trees; early/non-commercial thinning.</b></li> <li>- Forestry industry processing residues: <b>sawmill residues (slabs and chunks of wood, sawdust, shavings, bark); tall oil, brown and black liquor.</b></li> <li>- <b>End-of-life forestry materials: woody material from park and garden maintenance; orchards; construction and demolition waste wood; tree hedges.</b></li> <li>- <b>Alien invasive plants: generated as a waste by an operation cleaning an invaded area.</b></li> <li>- <b>Short rotation wood crops: perennial cropping systems planted to produce biomass or fibres with a system overall lifetime (i.e. from planting to final harvest) of less than 20 years and harvest taking place every 1-5 years.</b></li> <li>- <b>Roundwood (only eligible for the use in non-energy markets): stemwood, branches, roots, stumps and burls.</b></li> </ul> <p><b>Add a note in the 3b.2 criterion with the following clarification:</b></p> <ul style="list-style-type: none"> <li>• Any woody biomass material shall meet the RSB requirements for woody biomass (RSB-SA-01).</li> <li>• Operators shall provide evidence about the wood biomass material type in order to demonstrate that the material was not produced for the purpose of biofuel or biomaterial production.</li> </ul>	RSB requirements for woody biomass (RSB-SA-01) applies.	<b>28/11/2022.</b>

<b>P&amp;C ID (Who?)</b>	M.R. 3b.2. In the case of energy products derived from other forestry products, the operator shall use a GHG accounting methodology that
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Update wording.</li> </ul>	The UK's Ofgem Solid and Gaseous Biomass Calculator tool is out of date.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°18</u></b>                      Remove the UK's Ofgem Solid and Gaseous Biomass Calculator tool from the text</p>	n.a.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 3c. Biofuels shall have on average 50% lower lifecycle greenhouse gas emissions relative to the fossil fuel baseline (60% for new installations)
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Update wording.</li> </ul>	Include the GHG requirement under RSB CORSIA. CORSIA requirements shall be included in the P&C

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°19</b></p> <p>Include the following item:</p> <ul style="list-style-type: none"> <li>Operators under RSB ICAO CORSIA system, in addition to the 50% reduction requirement for lifecycle GHG emissions, shall demonstrate that the sustainable aviation fuel achieves, on a life cycle basis including the default value for induced land use change set by ICAO CORSIA, net GHG emissions reductions of at least 10% compared to the baseline life cycle emissions values for aviation fuel.</li> </ul>	- RSB GHG methodology and RSB ICAO CORSIA Standard	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria 3c. Biofuels shall have on average 50% lower lifecycle greenhouse gas emissions relative to the fossil fuel baseline (60% for new installations)
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Update Criteria.</li> </ul>	EU RED GHG target reduction requirement shall be mentioned in the P&C and therefore requires inclusion of the GHG requirement.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°20</u></b>                      Include the following item:</p> <ul style="list-style-type: none"> <li>Operators under RSB EU RED shall comply with the EU RED requirements for GHG emissions savings of the final biofuels / bioliquids as indicated in the RSB-STD-11-001.</li> </ul>	- RSB GHG methodology and RSB EU RED Standard	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Principle 3. Biofuel contribute to climate change mitigation etc...
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Add a new criterion</li> </ul>	<p>- For a more comprehensive emissions coverage a criterion for biomaterials should be considered.</p>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°21</b>                      Add new criterion:                      Criteria 3d. Advanced products shall have on average 10% lower lifecycle greenhouse gas emissions relative to the lifecycle greenhouse gas emissions of a comparable fossil product.</p>	<p>- RSB GHG methodology and RSB Advanced Product Standard to be complied with.</p>	<p>28/11/2022.</p>

<b>P&amp;C ID (Who?)</b>	Principle 3. Biofuel contribute to climate change mitigation etc...
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	<ul style="list-style-type: none"> <li>Update the text in box 1, page 32</li> <li>Remove box 2, page 32</li> </ul>	<ul style="list-style-type: none"> <li>Box 1: The new RSB requirements for woody biomass is not mentioned. Update is required.</li> <li>Box 2: The explanation for fossil-fuel baseline is no longer required. And the GHG Trading System is not yet in place.</li> </ul>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°22</u></b>                      BOX 1: Deforestation and unsustainably managed forests are serious environmental risks. The RSB addresses these risks ... Operators are therefore required to provide evidence that <b>1) the RSB requirements for woody biomass are fulfilled</b>, and 2) forestry residues are sourced from forests with a valid Forest Stewardship Council (FSC) certification or any certification scheme with equivalent sustainability requirements as approved by the RSB (for more information, see RSB Standard for certification of biofuels and bio-products based on end-of-life- products, by-products and residues, RSB-STD-01-010).</p> <p>BOX 2: .The RSB fossil-fuel baseline values can me mentioned in the criterion text. Regarding the “GHG Trading System” text, verify if it is worth mentioning the Book &amp; Claim.</p>	n.a.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Principle 4: human and labour rights   Operations do not violate human rights or labour rights, and promote decent work and the well-being of workers.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C	Improve scoping	A more comprehensive approach to workers rights needs to be considered.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°23</b>                      Suggestion to improve wording to:                      Operations do not violate human rights or labour rights, and promote decent work and the well-being of workers, <b>in line with all relevant ILO conventions. Where not applicable, a sound justification needs to be developed.</b></p>	<p>P.O.s identify and comply with all applicable and relevant ILO conventions. Where not applicable, a sound justification is identifiable.</p>	<p>28/11/2022.</p>

<b>P&amp;C ID (Who?)</b>	Criteria 4a. Workers shall enjoy freedom of association, the right to organise, and the right to bargain collectively.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Add minimum requirement	More details are needed to guide organizations towards improved Freedom of Association management

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°24</b>                      Suggestion to include the following additional MINIMUM REQUIREMENTS to the criteria:                      4.a.2. Workers shall be free to choose the organisation that will represent them in collective bargaining. Adopt: <a href="#">UNEP 2020 Social LCA guidelines</a>                      4.a.3. Workers representatives shall not be discriminated and will be able to engage with fellow employees. Union activities are not impaired.                      4.a.4. Union activities are not impaired and collective negotiation is assured.                      4.a.5 Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements                      4.a.6 Workers have access to a neutral, binding, and independent dispute resolution procedure</p>	<p>4.a.2 Document showing affiliation, policies, procedures, interviews w employees.                      4.a.3 Interviews w/employees. Union minutes.                      4.a.3 Employee/union representatives are invited to contribute to planning of larger changes in the company, which will affect the working conditions                      4.a.4 Registries of collective negotiation are documented.                      4.a.5. Notice periods are verifiable in collective agreements / employee contracts.                      4.a.6 Procedure is documented, and proof of training and dissemination is available.</p>	<p>28/11/2022.</p>

<b>P&amp;C ID (Who?)</b>	Criteria 4b. No slave labour or forced labour shall occur. The participating operator shall not be engaged in or support the use of forced, compulsory, bonded, trafficked or otherwise involuntary labour as defined in ILO Convention 29..
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Add minimum requirement	Workers need clear indications of what the working conditions are, including their obligations and rights are, working hours, resting periods, payment method, rights to claim fair treatment, safety, etc. Document needs to include what law protects them and what mechanisms for grievances exist.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°25</b> Suggestion to include the following additional MINIMUM REQUIREMENTS to the criteria: 4.b.2. Workers know their labour rights and have a written document explaining the working conditions.</p>	4.b.2 Written documents are available showing acceptance (e.g., through signed forms) of working conditions, worker rights and obligations, applicable legal framework explained and grievance mechanism.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	Criteria. 4d. Workers shall be free of discrimination of any kind, whether in employment or opportunity, with respect to gender, age, wages, working conditions, and social benefits.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity	Career development “per se” is not necessarily directly related to discrimination. Discrimination can be exercised through different behaviours including during the selection process, verbal slur, overextended work load, threats, etc. As with the previous criteria, 4c, including a robust management system, with clear policies, procedures, sensitization, trainings, dissemination etc. is more encompassing than "encouraging" career development.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°26</u></b>                      Suggestion to include the following additional MINIMUM REQUIREMENTS to the criteria:                      4.d.4. P.O.s have clear policies and procedures against discrimination and how to manage potential issues. Management includes training, sensitization, dissemination and other awareness raising practices.</p>	4.d.4. A management system is in place including policies, procedures, evidence on trainings, etc.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	M.R. 4.d.3 Work sites shall be safe for women; free from sexual harassment and other discrimination and abuse; and promote access to jobs, skills training, recruitment and career development for women to ensure more gender balance in work and career development..
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity	Should the scope expand beyond women to consider other vulnerable or marginalized groups?

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°27</b></p> <p>Suggestion to reword MINIMUM REQUIREMENTS criteria:                      4.d.3. Mechanisms are put in place to ensure safe working environments are in place, free from sexual harassment and other types of discrimination and abuse. Access to jobs, skill trainings, recruitment and career development is assured for women and everyone independently from</p>	4.d.4. A management system is in place including policies, procedures, evidence on trainings, etc.	28/11/2022.

<b>P&amp;C ID (Who?)</b>	<p>Criteria 4e. Workers’ wages and working conditions shall respect all applicable laws and international conventions, as well as all relevant collective agreements. Where a government-regulated minimum wage is in place in a given country and applies to the specific industry sector, this shall be observed. <i>Where a minimum wage is absent, the wage paid for a particular activity shall be negotiated and agreed on an annual basis with the worker.</i> Men and women shall receive equal remuneration for work of equal value..</p>
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity	How does an annual basis payment ensure a minimum viable income for a worker? Suggestion to link payments to the economic context assessed through the ESMP when a minimum wage is not an available reference.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°28</b>                      Suggestion to include the following additional MINIMUM REQUIREMENTS to the criteria:                      4.e.5. P.O.s assure workers a decent wage payment by including an assessment within the ESMP when a minimum wage is not available as a reference.                      Add: review if SIA Guideline requires further details on this issue.</p>	<p>4.d.4. Evidence of information tracked or generated in the social impact assessment is available.</p>	<p>4.e.5 - 28/11/2022                      Add: 28/11/2023</p>

<b>P&amp;C ID (Who?)</b>	M.R. 4e.1 Wages shall be provided in cash or in another form acceptable to workers.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording	Suggest to modify text to make the payment acceptable to market norm instead of acceptable to workers. If workers want to get paid in seed or fertilizer, it might not always be easy for a P.O. to comply with that demand. Instead, adjusting to market norm would be easier for a company. Additionally, there is nothing on electronic payments, enabling bank accounts, etc. to make payments more transparent. Payslips are an important tool for transparency and legal compliance.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°29</b> Suggestion to reword the MINIMUM REQUIREMENT as: “4e.1 Wages shall be provided in cash or in another form acceptable to local market customs, and payments are ensured through a transparent process”</p>	<p>4.e.1. Payslips are available and is a mechanism understood by employees. Transparency can be verified through formal banking processes (transfers) or a third party mechanism can be put in place to assure effective payment.</p>	<p>4.e.5 - 28/11/2022</p>

<b>P&amp;C ID (Who?)</b>	M.R. 4.e.2 Any housing provided by the operator for permanent or temporary workers shall be built and maintained to ensure <i>good</i> sanitary, health, and safety conditions.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording + Merge with M.R. 4.f.10	Suggest more detail go into what "good sanitary, health and safety conditions" to clarify what "good" actually means E.g. Separate bathrooms for women and men, adequate drinking water quality, shelter, heating, bedding, cooking facilities, etc. If the employees are obliged by distances and / or migratory or stational work (e.g. harvest), housing and facilities shouldn't be charged for. Transportation to the farm can also be provided if the distance from living location exceeds "x" amount of Km. (e.g. 10km) and no forms of public transport are available.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°30</u></b>                      Suggestion to reword the MINIMUM REQUIREMENT as:                      4e.1 Any housing provided by the operator for permanent or temporary workers for long or short term living, shall be provided, built and maintained to ensure adequate sanitary, health and safety conditions, including: sanitary facilities (e.g. separately for women and men, incl. toilets, showers, lockers, etc.), adequate drinking water quality, shelter, heating, bedding, cooking facilities, etc. Facilities for storing, preparing and distribution of food provided to workers are designed, built and regularly maintained to meet the basic needs of the personnel and their families, comply with legal requirements, and ensure safe and healthy conditions.                      Add. Include further details in SIA Guideline, Rural and Social Dev. Guideline or develop an additional Guideline for safety and infrastructure working conditions.</p>	4.e.1. Evidence of invoices with investments in infrastructure improvement, visual inspection, interviews with employees.	4.e.5 - 28/11/2022

<b>P&amp;C ID (Who?)</b>	M.R. 4.e.4 The maximum number of regular hours worked per week must not exceed 48. Workers may work overtime which shall be voluntary, but total working hours shall not exceed 80 per week.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording	The current MR sets total maximum to 80 per week, when this limit should not exceed <b>60</b> per week. This is particularly important in the context of migrant workforces in the rural setting during periods of intense labour (e.g. harvesting, pruning, etc.).

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°31</u></b>                      Suggestion to reword the MINIMUM REQUIREMENT as:                      4.e.4 Suggest correcting and re-adjusting maximum weekly hours: “The maximum number of regular hours worked per week must not exceed 48. Workers may work overtime which shall be voluntary, but total working hours shall not exceed <b>60</b> per week.”                      legal requirements, and ensure safe and healthy conditions.                      Add. Include further details in SIA Guideline, Rural and Social Dev. Guideline.</p>	4.e.1. Evidence of registered worked hours, particularly in field activities. Visual inspection, interviews with employees.	28/11/2022

<b>P&amp;C ID (Who?)</b>	M.R. 4.f.1. Workers shall not be exposed to any occupational health or safety hazards without adequate protection and training as defined in national law and international standards.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity + Add minimum requirement	Identify what standards or requirements could be considered “adequate” and used as guidelines. Additionally, it is important for hazardous jobs, and risky activities to have key health indicators monitored to avoid job related diseases and health issues.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°32</u></b>                      Suggestion to add guidance and additional MINIMUM REQUIREMENT as:                      4.f.1 Could include references from:  <a href="https://www.osha.gov/personal-protective-equipment/standards">https://www.osha.gov/personal-protective-equipment/standards</a>  <a href="https://www.bvl.bund.de/EN/Tasks/04_Plant_protection_products/04_Users/03_PersonalProtectiveEquipment/ppp_users_PPE_node.html;jsessionid=EE1307C6CB272D235F658A7006CAA0C8.2_cid298#doc11010640bodyText4">https://www.bvl.bund.de/EN/Tasks/04_Plant_protection_products/04_Users/03_PersonalProtectiveEquipment/ppp_users_PPE_node.html;jsessionid=EE1307C6CB272D235F658A7006CAA0C8.2_cid298#doc11010640bodyText4</a>  <a href="https://single-market-economy.ec.europa.eu/sectors/mechanical-engineering/personal-protective-equipment-ppe_en">https://single-market-economy.ec.europa.eu/sectors/mechanical-engineering/personal-protective-equipment-ppe_en</a></p> <p>4.f.11. Workers should have key health indicators monitored during their employment to reduce job related health issues.</p>	4.f.1. Evidence of protective gear is observed with visual inspections, purchasing invoices, and interviews with employees. 4.f.11 Evidence of Key Health Monitoring Indicators, records and employee interviews.	28/11/2022

<b>P&amp;C ID (Who?)</b>	Criteria 5a. In regions of poverty, operations contribute to the social and economic development of local, rural and indigenous people and communities
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Add minimum requirement	Suggest to add new requirement which will help to empower the local society in the development of new skills

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°33</b>  <b>Suggestion to reword the MINIMUM REQUIREMENT as:</b> Organizations also may encourage local community development by training local employees in technical and transferable skills</p>	<ul style="list-style-type: none"> <li>Create a planning for internal training</li> <li>Site visit or site-specific audit</li> <li>Interviews with community members, employees, governmental agencies, management, and NGOs</li> <li>Review of organization-specific reports, such as GRI or COP reports</li> </ul>	<p><b>28/11/2022</b></p>

<b>P&amp;C ID (Who?)</b>	M.R. 5.a.6 At least one measure to significantly optimise the benefits to local stakeholders shall be implemented within a three-year period of the start of the operations, for instance: a) Creation of year-round and/or long-term jobs b) The establishment of governance structures that support empowerment of small-scale farmers and rural communities such as co-operatives and micro-credit schemes c) Use of the locally produced bio-energy to provide modern energy services to local poor communities d) Shareholding options, local ownership, joint ventures and partnerships with the local communities e) Social benefits for the local community such as the building or servicing of clinics, homes, hospitals and schools
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal support resource.	Add guidance	Shared responsibility - ensuring that downstream (big) companies invest in upstream communities - responsibility to be shared along the supply chain. Companies should be there to help producers & transform supply chains - in return, they can link to the positive impacts. Link to different fee model, for a higher-level phased approach? E.g. baseline certification paid for by producers; higher-level certification that verifies positive impacts is paid for by brands, who can then make direct claims to those impacts - impacts must be local & contextualised.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°34</u></b>                      improve guidance:                      Improve guidance material RSB-GUI-01-005-02-Rural-and-Social-Development-Guidelines to include parameters and aspects covering economic incentives beyond job creation.</p>	<ul style="list-style-type: none"> <li>Guidance proves effective to enable a higher level of investments of companies in supply chains.</li> <li>Companies demonstrate use of guidelines and provide evidence in audits of compliance.</li> </ul>	<p>28/11/2023</p>

<b>P&amp;C ID (Who?)</b>	M.R. 5.b.1 Data for rural poor women in regions of poverty shall be disaggregated in the baseline social surveys to assist with the design of special programmes for the targeted people.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity.	Considering the minimum requirement is applicable to biomass producer and industrial operator, there could be cases where principle 5 is applicable (due the country IHDI), but the industrial operator is not located in the rural areas or does not have any link to rural communities, creating confusion during implementation.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°35</b>                      improve guidance by:                      Improve clarity of applicability by modifying requirements. When the purchasing of biomass is done directly by the industrial operator even without having physical operations in the area of sourcing, the M.R. should apply. If done through an intermediary organization (e.g. Trader, like Cargill) require the intermediary organization to be certified.</p>	<ul style="list-style-type: none"> <li>Participating Operator complies with M.R. when the sourcing is done directly from the region with identified issues. When purchased to an intermediate, has certificates to validate the purchases.</li> </ul>	<p>28/11/2022</p>

<b>P&amp;C ID (Who?)</b>	M.R. 6.a.1 D Where the screening exercise of the RSB impact assessment process reveals a direct impact on food security in food-insecure regions, Participating Operators shall conduct a food security assessment in accordance with the RSB Food Security Assessment Guidelines (RSB GUI-01-006-01).
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal Support Resource	Guideline.	Climate change impacts need to be considered in Food Insecure regions. This would be in line with criteria 6b. In food insecure regions, operations shall enhance the local food security of the directly affected stakeholders

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°36</u></b>  <b>improve guidance by:</b>                      In accordance with the RSB Food Security Assessment Guidelines (RSB GUI-01-006-01) point 5.2 Targeting and implementing mitigation and enhancement measures, include a climate change approach to enhancing food security.</p>	<ul style="list-style-type: none"> <li>Participating Operators have a Food Security action plan that includes climate change mitigation and adaptation strategies, adjusted to GUI-01-006-01/5.2 requirements.</li> </ul>	<p><b>28/11/2023</b></p>

<b>P&amp;C ID (Who?)</b>	Principle 7 Conservation   Operations avoid negative impacts on biodiversity, ecosystems, and conservation values.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve scoping.	The achievement of net-zero emission pledges is predicated on large scale removals. The RSB is well positioned to promote those in land-based sectors where RSB-certified feedstock is produced.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°37</u></b>                      Improve working in:                      Principle 7: conservation   Operations avoid negative impacts on biodiversity, ecosystems, conservation values <b>and increase in carbon stocks accumulation (soil and/or forest)</b> Applicable to feedstock producers and their supply chains.</p> <p>7.b.1. In accordance with the results of the impact assessment process, Participating Operators shall implement practices through the Environmental and Social Management Plan (ESMP) that maintain <b>and / or enhance</b> ecosystem functions and services, such as biodiversity <b>or carbon stocks</b>, both inside and outside the operational site, on land which is directly affected by the operations.</p> <p>RSB-GUI-01-007-01 Improve guidance material to incorporate this concept and other relevant environmental aspects (e.g. climate change).</p>	<ul style="list-style-type: none"> <li>Participating Operators have a Food Security action plan that includes carbon stock increase, with action plan adjusted to GUI-01-007-01</li> </ul>	<p>28/11/2023</p>

<b>P&amp;C ID (Who?)</b>	M.R. 7.a.1 Participating Operators shall identify the conservation value(s) within the area of a potential or existing operation during the screening exercise of the RSB impact assessment process (Principle 2)..
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity.	It is not currently defined in the Minimum Requirement how climate zones should be categorised and what tools to use for that.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°38</b>                      Improve working in:                      We propose that the new P&amp;C should follow the updated IPCC 2020 Climate zone map categorization to define the climate zone categories.  <a href="https://essd.copernicus.org/articles/12/2959/2020/essd-12-2959-2020.html">https://essd.copernicus.org/articles/12/2959/2020/essd-12-2959-2020.html</a></p>	<ul style="list-style-type: none"> <li>Climate zoning is used according to the new requirements.</li> </ul>	<p><b>28/11/2023</b></p>

<b>P&amp;C ID (Who?)</b>	M.R. 7.a.5 Areas identified as “no-go areas” shall not be used for operations after the 1st of January 2008, unless feedstock production or processing operations are legally authorised as part of the conservation management for the area concerned. No-go-areas are nationally, regionally, or internationally legally protected areas including but not limited to those designated by any of the of the following... + 7.a.6 + 7.a.7
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve specificity.	7.a.5 + 7.a.6 + 7.a.7 could be interpreted as contradictory when .5 and .6 point out to no conversion or no usage and then .7 refers to usage in conservation areas. An improved definition of degraded and abandoned land is required. Together of the revision of the no-go and conversion areas P&C will describe more precisely the different land use types and give further guidelines how the potential positive Land use change, GHG emission reduction and improvement on biodiversity can be considered. Further define the evidence needed to allow the usage of the bonus of 29 g CO2eq/MJ (mentioned in RED) of taking unused/degraded land into a use. Currently it is not sufficiently described. Additionally, the references in each Minimum Requirement can be replaced by new sources or become outdated if the third party organizations do not upkeep or if legal frameworks change.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°39</u></b>                      Improve working in:                      We propose to consolidate 7.a.5 and 7.a.6 into one Minimum Requirement (M.R.) and redefine 7.a.7 to usage only if the newly consolidated 7.a.5 and 7.a.6 M.R. does not supersede. Also instead of mentioning the resources within the M.R., the M.R. should point out compliance with guidance containing the external resources and a more in-depth methodology contained in RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines. Additionally, include, new legal frameworks, new definitions (e.g. degraded, abandoned), land types, etc. Reword 7.a.7 into If areas are identified which do not fall into the category of 7.a.5/6, yet contain conservation values of global, regional or local importance or serve to maintain or enhance such conservation values (as determined by the RSB GUI-01-007-01), these shall only be used if adequate management practices maintain or enhance the identified conservation values (e.g. sustainable biomass harvesting).</p>	<ul style="list-style-type: none"> <li>7.a.5 + 7.a.6 + 7.a.7 are complied with providing conservation analysis as per RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines.</li> </ul>	<p><b>28/11/2023</b></p>

<b>P&amp;C ID (Who?)</b>	M.R.7.a.8 Hunting, fishing, ensnaring, poisoning and exploitation of rare, threatened, endangered and legally protected species shall not occur on the operation site.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal Resources	Improve specificity.	External input has questioned the relevance of the M.R. and the guidance in the 21-08-18 RSB Screening Tool _v3.0. A more robust justification in the RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines could clarify any questioning.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°40</b>                      Improve working in:                      RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines can be improved by including broader context to conservational aspects, including endangered species or add more references to the framework.</p>	<ul style="list-style-type: none"> <li>P.O.s comply with the RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines</li> </ul>	<p><b>28/11/2023</b></p>

<b>P&amp;C ID (Who?)</b>	<p>M.R. 7.d.2 Whenever the operational site impairs the connectivity between surrounding ecosystems, ecological corridors shall be created by the operator.</p> <p>7.d.3 New ecological corridors shall be created within the operation site if it is surrounded by areas containing wildlife and there is evidence that such corridors would improve connectivity.</p>
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal Resources	Improve Guidelines.	Guidance could improve clarity on how to measure “connectivity” and what are minimum criteria for “ecological corridors” in the case of requiring its creation.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°41</b>                      Improve working in:                      RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines can be improved by including an improved methodological approach to “connectivity” and “ecological corridor creation”.</p>	<ul style="list-style-type: none"> <li>P.O.s comply with the RSB-GUI-01-007-01 RSB Conservation Impact Assessment Guidelines</li> </ul>	<p><b>28/11/2023</b></p>

<b>P&amp;C ID (Who?)</b>	Criteria 8a - Soil
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
3. External resource	Standard	Include updated resources to strengthen the principle, considering ways to incentivise the use of regenerative agricultural practices to improve soil health and soil carbon accumulation.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°42</b> Suggest to consider the rainforest alliance which has a good program for soil. If possible, use it as reference or recognize as the approach for soil conservation. Also add criteria in the RSB checklist. Reference documents:</p> <ul style="list-style-type: none"> <li>• <a href="#">Rainforest Alliance Sustainable Agriculture Standard - For farms and producer groups involved in crop and cattle production: Continuous Improvement Area: Soil Conservation and Management.</a></li> <li>• <a href="#">Rainforest Alliance Sustainable Agriculture standard - Farm requirements</a></li> <li>• <a href="#">Rainforest Alliance Guidance J: Soil Fertility and Conservation</a></li> <li>• Include relevant guidance already part of the EU RED framework: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018L2001&amp;qid=1657753909166">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018L2001&amp;qid=1657753909166</a></li> </ul>	<p>If rainforest alliance is recognized, the verification method shall the RA Standard. The criteria from RA should be incorporated in the RSB checklist, which will guide CBs</p>	<p>2023</p>

<b>P&amp;C ID (Who?)</b>	M.R. 8.a.2 Operators shall implement practices to protect soil structure, including the prevention of compaction, and maintain or enhance soil organic matter on the feedstock production site.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal resource	Improve scoping	<p>Emission Saving from Soil Carbon Accumulation (ESCA) is an important component of climate change mitigation that can be leveraged. There are multiple models that can be used to estimate soil organic carbon and the positive impacts of feedstock production on the soil.</p> <p>Define the rules and verification methods for the base scenario for regenerative soil activities (both quality and quantity).</p> <p>Define the framework for carbon farming (i.e. adding carbon into the soil as an additional part of a normal agricultural activities) concept (e.g. recognising the potential of regenerative agriculture through balanced nutrition and improved fertilization activities – like recycled fertilizer and intentionally added biocarbon / biochar) as well as cover cropping, crop rotation, minimum tilling to improve soil quality and carbon intake. Soil organic carbon benefits are currently not accessible to growers, and this could be an incentive for wider sustainable agriculture adoption, including revaluation of residues used in biofuels. New methods how to increase soil carbon and soil quality should be wider developed and recognised in P&amp;C. In addition, the impact on carbon farming activities to reduce GHG emissions should be considered, and regenerative practices for farming carbon.</p>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°43</b></p> <p>Expand existing RSB-GUI-01-008-01 to include all the abovementioned aspects, implement a soil carbon estimation methodology (e.g. embed / adopt IPCC estimation methodology), reword the Minimum Requirement to include carbon sequestration or related concepts e.g. ESCA: “8.a.2 Operators shall implement practices (in accordance with RSB-GUI-01-008-01) to protect soil structure, including the prevention of compaction, and maintain or enhance soil organic matter, carbon sequestration and overall fertility and biological activity on the feedstock production site.”</p> <p>Resources other than IPCC to use as a basis for improved Guidance include Comet-Farm tool and the RothC model, the Argonne National Lab that started embedding soil carbon into GREET calculations, FAO document on measuring and modelling soil carbon, the climate modelling and farm-level vulnerability assessments, and the WCRP Coupled Model Intercomparison Project (CMIP). Develop indicators for improved guidance and biological activity.</p>	Application of new guidelines and indicators measured at soil level (e.g. Carbon and C/N)	28/11/2023

<b>P&amp;C ID (Who?)</b>	M.R. 8.a.3. The use of agrarian and forestry residual products for feedstock production, including lignocellulosic material, shall not be at the expense of long-term soil stability and organic matter content.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal resource	Improve guidance	Use of residual products requires further guidance on use and replenishment to assure carbon stocks in the soil are maintained. Additionally, ruling should also include that residues from crops and forestry (i.e. in particular, those used for fibres) should be tracked back to the field or forest of origin.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°44</b>                      Expand RSB-SA-01 or convert RSB-SA-01 into compliance guidelines indicating use of other biomass materials labelled as “residues” other than forestry residues are used sustainably and traced back to origin effectively.</p>	Participating Operators effectively apply and use RSB-SA-01	28/11/2023

<b>P&amp;C ID (Who?)</b>	M.R. 8.a.5. Operators shall implement measures to improve soil health, such as the following Conservation Agriculture practices <sup>14</sup> : - Direct seeding or planting: Involves growing crops without mechanical seedbed preparation and with minimal soil disturbance; - Maintenance of a permanent soil cover, by mulch or growing cover crops to protect the soil surface; - Diversifying and fitting crop rotations and associations in the case of annual crops and plant associations in the case of perennial crops.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal resource	Improve guidance	The list of suggestions described in the Minimum Requirement, could be developed further.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°45</b> Expand RSB-GUI-01-008-01 to include other conservation or agricultural approaches to soil health including IPM and other sustainability practices.</p>	Participating Operators effectively apply and use RSB-GUI-01-008-01	28/11/2023

<b>P&amp;C ID (Who?)</b>	M.R. 8.a.6. Where the screening exercise has triggered the need for a Soil Impact Assessment (RSB-GUI-01-008-01), operators shall: - Develop a soil management plan as part of the Environmental and Social Management Plan (ESMP). - Perform periodic sampling of soil on the feedstock production site to evaluate the effect of the soil management plan on the organic matter content. Where the practices included in the soil management plan are not seen during monitoring to maintain soil organic matter at the optimal level, alternative practices shall be investigated.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve scoping	A Soil Management Plan should be a mandatory requirement, independently of the screening exercise, as any biomass producer needs to sustain soil fertility overtime, keep records and implement a adequate agricultural practices adapted to local conditions. The Screening exercise should trigger a Soil Impact Assessment when soil parameters show the need for an improvement or fertility regeneration practices are necessary.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°46</b>                      Re-word the Minimum Requirement to “<b>Biomass producers will develop a Soil Management Plan adapted to production plan, local agroecological and soil conditions.</b> Where the screening exercise has triggered the need for a Soil Impact Assessment (RSB-GUI-01-008-01), operators shall: - Develop a soil <b>improvement</b> management plan as part of the Environmental and Social Management Plan (ESMP). - Perform periodic sampling of soil on the feedstock production site to evaluate the effect of the soil management plan on the organic matter content. Where the practices included in the soil management plan are not seen during monitoring to maintain soil organic matter at the optimal level, alternative practices shall be investigated.                      RSB-GUI-008-01 can be expanded to include recommendations on adequate soil management plan practices.</p>	Participating Operators demonstrate having a Soil Management Plan following recommendations in GUI-01-008-01.	28/11/2023

<b>P&amp;C ID (Who?)</b>	Criteria 9.b.Operation shall include a water management plan which aims to use water efficiently and to maintain or enhance the quality of the water resources that are used for the operations.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording to align with CE criteria	There is a need to show that P&C are aligned with CE criteria and that this approach is taken into account in the requirements. Related to water management

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°47</b> Suggestion to include modify the wording including CE concept: Operation shall include a water management plan based in <b>Circular Economy strategies</b>. This plan should aim to use water efficiently and to maintain or enhance the quality of the water resources that are used for the operations. <b>Water management resources and guidelines for water footprint calculation are encouraged to be used and integrated to the ESMP.</b></p> <p>Suggestion to develop or adopt water management and water footprint calculation resources (e.g. <a href="https://waterfootprint.org/en/resources/interactive-tools/">https://waterfootprint.org/en/resources/interactive-tools/</a>)</p>	<p>Circular economy strategies that help to efficient use of water are:</p> <ul style="list-style-type: none"> <li>- Reduce water use</li> <li>- Reuse: optimization of water use</li> <li>- Recycle water ( water treatment) to be used for the same or other purposes</li> <li>- Cascading: water (whether untreated or treated) can be used again and again in multiple stages of industrial and domestic processes</li> </ul>	<p>28/11/2022</p>

<b>P&amp;C ID (Who?)</b>	Criteria 9.b.Operation shall include a water management plan which aims to use water efficiently and to maintain or enhance the quality of the water resources that are used for the operations.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Add minimum requirement to requirement 9.b.2	Use of technologies can be a useful tool in order to measure quantity and quality of water sources. It can help to monitor on real time water used and help to optimise water resources. Furthermore it can also detect deviations in water quality.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°48</b> Suggestion to include a requirement which suggest use of IT for water monitoring of the quality and quantity of water or a support water footprint calculation, such as: <a href="https://www.waterfootprintassessmenttool.org/">https://www.waterfootprintassessmenttool.org/</a></p>	<ul style="list-style-type: none"> <li>- Use of any IT: tools to measure on real time water quality and quantity</li> </ul>	<p>28/11/2022</p>

<b>P&amp;C ID (Who?)</b>	M.R. 9.d.7. Operations shall contribute to the enhancement or maintaining of the quality of the surface and groundwater resources - Wastewater or runoff that contains potential organic and mineral contaminants shall be treated or recycled to prevent any negative impact on humans, wildlife, and natural compartments (water, soil).
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording + create as own point 'E'	With the inclusion of industrial sites and chemical processing within the RSB schemes since the last update the P&C wastewater management has become a larger issue which should be addressed as such: <a href="https://www.theguardian.com/us-news/2022/jul/06/us-drinking-water-pfas-toxic-forever-chemicals-epa-tests">https://www.theguardian.com/us-news/2022/jul/06/us-drinking-water-pfas-toxic-forever-chemicals-epa-tests</a>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°49</b> Suggestion to make this a section of its own under P9 water management with accompanying guidance specific to either industrial sites or agricultural sites.</p> <p>See the AWS STANDARD 2.0 GUIDANCE 01.01.20 – Section 1.3.5 Page 12</p>	Auditors would check that the site has a management plan in place for water going back into the system as grey water and that companies are not dumping untreated water into the local water table etc.	28/11/2022

<b>P&amp;C ID (Who?)</b>	Criteria 10a: Air pollution emission sources from the operations shall be identified, and air pollutant emissions minimised through an air management plan.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Define major air pollutants (outdoor) from industries, critical industrial sources, and establish limit values.	Air pollution is one of the major environmental risk to health. According to WHO, outdoor air pollution in both cities and rural areas was estimated to cause 4.2 million premature deaths worldwide in 2016. The cause is mainly due to exposure to fine particulate matter of 2.5 microns or less in diameter (PM2.5), which cause cardiovascular and respiratory disease, and cancers. The definition of thresholds and limits for key air pollutants that pose health risks are important.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°50</b></p> <ul style="list-style-type: none"> <li>A limit value for outdoor emissions from industries should be defined. Priority should be given to industries located close to urban areas.</li> <li>Include a list of major air pollutant in a P&amp;C annex, rather than listing in criterion 10a.1. List should include: PM2.5, PM10, O3, NOx, SOx and BaP.</li> <li>Use the following European Directives as guidance:                     <ul style="list-style-type: none"> <li>Annex II, Annex V (PARTS 1, 2, 7), Annex VI (PARTS 3, 4, 5), Annex VII (PARTS 2, 4), 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions (integrated pollution prevention and control) – Recast. List of air pollutant substances.</li> <li>Article 6 and Annex II of the 2015/2193 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants. Includes SOx, NOx and dust emissions into the air from medium combustion plants.</li> </ul> </li> </ul>	<p>According to the following European Directives:</p> <ul style="list-style-type: none"> <li>Annex II (PART 4); Annex VI (PARTS 6, 7, 8); Annex VII (PARTS 6, 7, 8), : 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions (integrated pollution prevention and control) – Recast</li> <li>Annex III, PART 1 and PART 2: 2015/2193 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants.</li> </ul>	<p>28/11/2023</p>

<b>P&amp;C ID (Who?)</b>	M.R. 10a.2. The operator shall investigate and, whenever possible in the local context, implement Best Available Technology (BAT) to reduce air pollution, appropriate to the scale and intensity of operation..
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve Wording.	The concept of Best Available Technology is too vague. The current definition raises several questions such as: 1. "Is 'BAT' measurable?"; 2. What happens if the company is using the second-best technology?; 3. What is the guidance for audits?; 4. For example if "BAT" is not considered in use, are audited P.O.'s given a Non Conformity notice or could they incorporate a plan to upgrade the technology?

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°51</u></b>                      Suggestion to:                      Improve the definition of BAT and provide further guidance in the where P.O.s can find a list of accepted technologies, including for measuring emissions, mitigating emissions, including performance indicators and targets, etc. AIR aspects could be included in the RSB-GUI-01-009-01_RSB Water Assessment Guidelines_3.0_to produce a joint RSB-GUI-01-009-02_RSB Water and Air Assessment Guidelines</p>	P.O.s apply newly developed definitions and use guidance material.	28/11/2023

<b>P&amp;C ID (Who?)</b>	Principle 11. Use of technology, inputs and management of waste.   The use of technologies in operations seeks to maximise production efficiency and social and environmental performance, and minimise the risk of damages to the environment and people.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording + Merge with Circular Economy concept	There is a need to show that P&C are aligned with current trends in bioeconomy, particularly related to circular economy concept and how to apply CE strategies.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°52</b> Suggestion to modify the wording including the “Circular Economy” concept: The use of technologies in operations seeks to maximise production efficiency <b>boosting circular economy</b> and social and environmental performance, and minimize the risk of damages to the environment and people.</p>	Not applicable	28/11/2022

<b>P&amp;C ID (Who?)</b>	Criteria 11b. The technologies used in operations including genetically modified plants, micro-organisms, and algae, shall minimise the risk of damages to environment and people, and improve environmental and/or social performance over the long term.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording + Merge with Circular Economy concept	There is a need to show that P&C are aligned with current trends in bioeconomy related to circular economy concept and how to apply CE strategies .

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°53</b> Suggestion to include the “CE” concept: 11b. The technologies used in operations including genetically modified plants, micro-organisms, and algae, shall minimise the risk of damages to environment and people, and <b>improve environmental impact promoting circular economy strategies</b> and/or social performance over the long term.</p>	Circular economy strategies that can be measured: promote recycling of products, extend the life span of a product ( reuse, refurbish, servitization ), using renewable energies in the process	28/11/2022

<b>P&amp;C ID (Who?)</b>	M.R. 11e.6. Medium and large-scale operators, by-products or wastes shall also be reused by the processing/production unit or transferred to other sectors whenever their use may improve the overall system’s energy balance, greenhouse gas emissions, and/or economic viability without impairing the other principles and criteria in this standard.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Improve wording to align with CE criteria	<p>There is a need to show that P&amp;C are aligned with CE criteria and that this approach is taken into account in the requirements. Increasing recycling, reuse and refurbishing can create new jobs, avoid the need to produce new material and the need to handle waste (Goedkoop et al, 2020)</p> <p>While the recycling itself may have negative or positive impacts, it also lowers the need for virgin materials and thus can reduce impacts of mining and material processing. At the same time, there is less of a need for waste treatment, and this will affect workers in this sector. The PSIA method does not quantify the materials used, recycled or disposed of, so the reduction in virgin material production and waste handling can at best be described qualitatively. (Goedkoop et al, 2020)</p>

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°54</b></p> <p>Suggestion to modify the wording to include the CE concept: Medium and large-scale operators, by-products or wastes shall also be reused by the processing/production unit or transferred to other sectors <b>following Circular Economy criteria. This should be made</b> whenever their use may improve the overall system’s energy balance, greenhouse gas emissions, and/or economic viability without impairing the other principles and criteria in this standard.</p>	Circular economy strategies that can be measured: recycling, reuse products/ materials	28/11/2022

<b>P&amp;C ID (Who?)</b>	Criteria 11.f. Introduction of new technology, which enables continuous improvement in social and environmental performance, shall be encouraged, if appropriate security measures are taken.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C	Improve scoping	The RSB certification does not currently promote the introduction of new green technologies or efforts to create improved social performance through the development and use of technology,

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°55</b></p> <p>Suggestion to incorporate the new criteria as worded:                      Criteria 11.f. Introduction of new technology which enables continuous improvement in social and environmental performance shall be encouraged, if appropriate security measures are taken.</p> <p>Additionally, incorporate the following Minimum Requirements (M.R.):</p> <ul style="list-style-type: none"> <li>- 11.f.1 New technologies introduced to optimise and enable continuous environmental and social performance, will have a prior risk assessment and mitigation analysis to assure security measures before and during the adoption have been taken. Prior to the implementation of the technology, stakeholder consultation will be implemented as part of the ESMP stakeholder engagement process.</li> <li>- 11.f.2 New technology adoption will have an adequate management system, including monitoring and performance evaluation as part of the ESMP and ESMP monitoring process.</li> </ul>	<p>The process for the adoption, introduction and implementation of new technology is clearly documented.</p> <p>Stakeholder engagement is effectively verified.</p> <p>Monitoring and performance of the new technology is monitored and forms part of the ESMP.</p>	<p>28/11/2022</p>

<b>P&amp;C ID (Who?)</b>	12.a.2. Land under legitimate dispute shall not be used for operations until any legitimate disputes have been settled through Free, Prior and Informed Consent and negotiated agreements with affected land users.
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
2. Internal Resources	Improve Guidelines	A more robust framework is required to manage and correctly report and audit FPIC. Land use rights should also include cultural landmarks, cultural heritage sites.

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b><u>PROPOSAL N°56</u></b>                      Improve Impact Assessment Guidelines (RSBGUI- 01-002-01) and Land Rights Assessment RSB GUI- 01-012-01. Consolidate the FPIC guideline. And re-word M.R. 12.b.2. The Impact Assessment Guidelines (RSBGUI- 01-002-01) shall be referred to for guidance on Free Prior and Informed Consent” to align to 12.a.2.</p>	Participating Operators use the improved FPIC guidelines and can be effectively audited through documented engagement and consultation processes.	28/11/2023

<b>P&amp;C ID (Who?)</b>	Standard of Principles and Criteria RSB-01-001-P&Cs
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REFERENCE (Where?)	TOPIC / TYPE (What?)	EXPLANATION (Why?)
1. Edit P&C Standard	Overall structure	The Standard of Principles and Criteria is one of the most robust and best-in-class standards in the industry. For improved clarity and overall structure, the 12 Principles of the Standard could be clustered into grouping themes, which would make it easier to follow the rationale when implementing the certification..

PROPOSAL (How?)	VERIFICATION METHOD	IMPLEMENTATION DATE (When?)
<p><b>PROPOSAL N°57</b></p> <p>Group the Principles (P) according to 4 general themes:</p> <ul style="list-style-type: none"> <li>- Legal: P 1 =&gt; P 1 / P 12 =&gt; P 2</li> <li>- Management: P 2 =&gt; P 3 / P 11 =&gt; P 4</li> <li>- Social: P 4 =&gt; P 5 / P 5 =&gt; P 6 / P 6 =&gt; P 7</li> <li>- Environmental: P 3 =&gt; P 8 / P 7 =&gt; P 9 / P 8 =&gt; P 10 / P 9 =&gt; P 11 / P 10 =&gt; P 12</li> </ul>	Principles are re-ordered in the new P&C version according to the proposed themes.	28/11/2022.

# THANK YOU!

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A Just Transition to a Net Positive World