



SBP Regional Risk Assessment Procedure

Sustainable Biomass Program
sbp-cert.org



Version 2.0

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SBP Regional Risk Assessment Procedure (version 1.2)

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

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Contents

1	Purpose and scope	4
2	Appointment of a Working Body	5
3	Risk Assessment Report	7
4	Risk assessment development	9
5	Public consultation	12
6	Interim Regional Risk Assessment	14
7	Endorsed Regional Risk Assessment	15
8	Revision of Endorsed Regional Risk Assessment	16
9	Exception to Regional Risk Assessment Procedure	19
	Annex 1 - RRA work plan	20
	Annex 2 - Stakeholder concerns	21
	Annex 3 - RRA progress report	22
	Annex 4 - Appointment of a WB	23
	Annex 5 - WB Nomination letter	25
	Annex 6.1 - SBP_RRA_Template_FOR	26
	Annex 6.2 - SBP_RRA_Template_TOF	27
	Annex 7 - Guidance to complete Annex 1 of the RRA Report	28
	Annex 8 - SBP review of Draft 1 RRA	30
	Annex 9 – Local expert review of Draft 2 RRA	33
	Annex 10 - TC review of the Draft 3 RRA	36

1 Purpose and scope

- 1.1 This procedure specifies the requirements and process for the initial development and the revision of a risk assessment for a country or a region and its endorsement by SBP. Such a risk assessment is called 'Interim Regional Risk Assessment', 'Endorsed Regional Risk Assessment' or 'Interim RRA', 'Endorsed RRA', or 'RRA'.
- 1.2 An RRA shall only be approved or endorsed by SBP if it is developed or revised in accordance with this Procedure.
- 1.3 The Intellectual Property Rights of an approved or endorsed RRA resides solely with SBP.
- 1.4 SBP retains the sole right to all aspects of an RRA, including decisions to approve, reject, initiate development or revision, or withdraw an endorsed RRA.
- 1.5 SBP shall retain overall accountability for overseeing the development or revision of an RRA.
- 1.6 The figure below provides a process flowchart for developing the RRA.

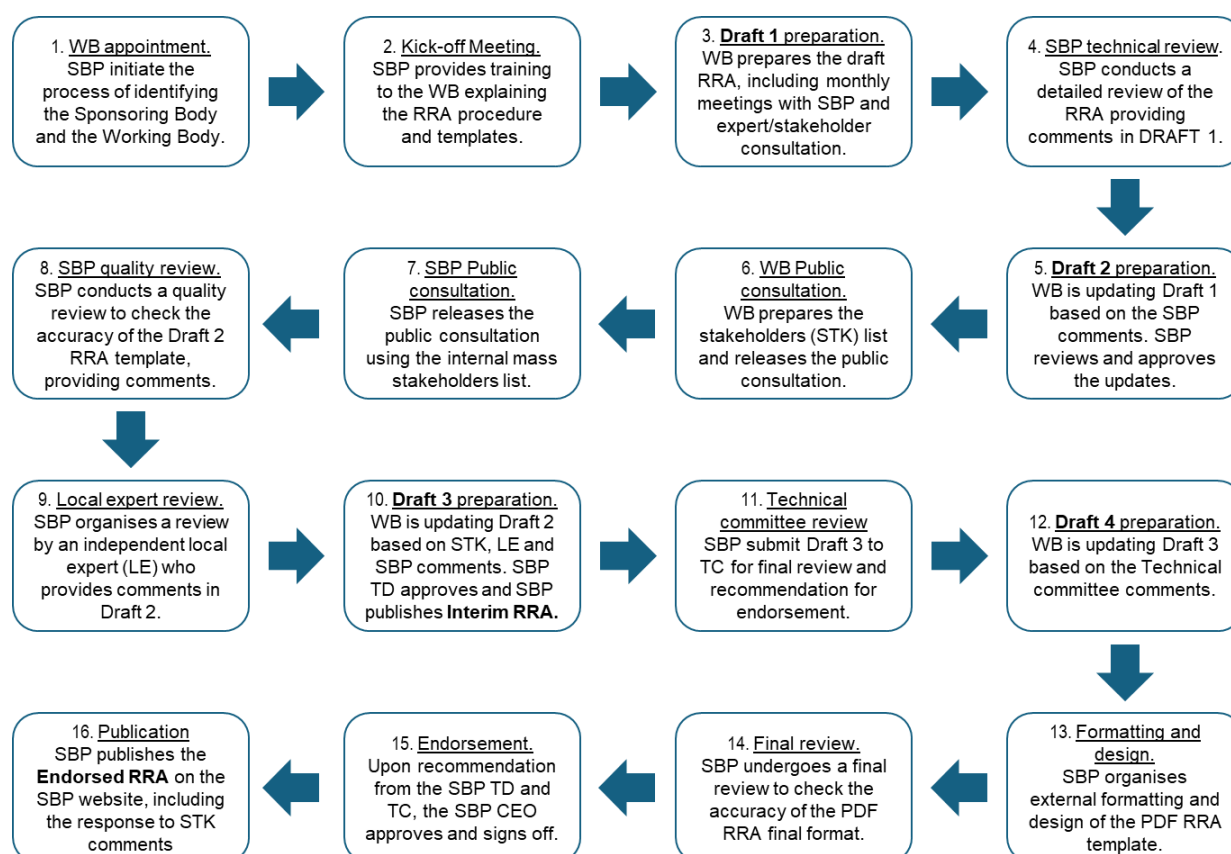


Figure 1. RRA process flowchart

2 Appointment of a Working Body

- 2.1 SBP shall appoint a Working Body (WB) to develop or revise an RRA.
- 2.2 An external 'Sponsoring Body' (SB) may finance or otherwise support the development of an RRA. An SB may comprise a single party or a group working collaboratively and may recommend a WB.
- 2.3 SBP may act as a 'Sponsoring Body' to resource the development or revision of an RRA. Conditions for SBP acting as a "Sponsoring Body" are specified in the "Policy on SBP Funding of Regional Risk Assessments".
- 2.4 Before the appointment of a WB, SBP shall review and confirm that a WB:
 - a) has demonstrable necessary competence, knowledge and experience in including but not limited to the following:
 - a. ecological and social values
 - b. carbon and climate regulations
 - c. business management practices
 - d. the operation of suppliers and contractors, including management systems and products
 - e. SBP requirements
 - f. Due Diligence Systems (DDS)
 - g. stakeholder engagement
 - h. supply chain within the region(s);
 - b) has sufficient, suitably qualified staff and resources to perform the risk assessment;
 - c) can demonstrate competence in the application and interpretation of SBP requirements and Standards, including the requirements identified in this RRA Procedure in the context of the region in which the RRA is developed;
 - d) has relevant knowledge of the language, laws and customs of the region(s) in which the WB will operate;
 - e) has relevant knowledge of the EU RED legislation;
 - f) has effectively managed any real or perceived conflict of interest which could affect the objectivity of the work and
 - g) accepts the rules and procedures laid down by SBP for developing, approving, and revising the RRA.
- 2.5 The WB shall ensure to provide the following information to SBP before engaging in the risk assessment development:
 - a) Prepare a documented timeline using Annex 1 - RRA work plan;
 - b) Prepare a draft stakeholder/expert consultation list to be used during the drafting of the RRA;
 - c) Develop a consultation plan to collect information from local experts and stakeholders during the drafting of the RRA, as it constitutes an essential source of information. In-person meetings or seminars should be included in the stakeholder engagement plan;
 - d) Identify stakeholder concerns using Annex 2 - Stakeholder concerns by identifying relevant sources of information (for example, websites of relevant NGOs, media articles, social media, scientific reports and studies) that could be relevant to the RRA;
 - e) Determine the 'geographic scope' of the assessment, taking into consideration the homogeneity of the region(s);
 - f) Rationalise using "sub-scopes" if applicable or justify if not applicable.
 - g) Appoint a Co-ordinator who is responsible for facilitating and managing the development of the RRA according to the requirements of this Procedure and be the contact point with the SBP Secretariat.

- 2.6 The WB shall confirm its commitment to plan and set up monthly update meetings with SBP during the RRA drafting phase to provide updates on the progress of the risk assessment, using Annex 3 - RRA progress report for reporting.
- 2.7 Before commencing the development or revision, the WB must submit an RRA development or revision work plan to the SBP, considering the timeline provided in Figure 2 and the information from section 2.5 mentioned above. The work plan can cover the entire process or specific stages.

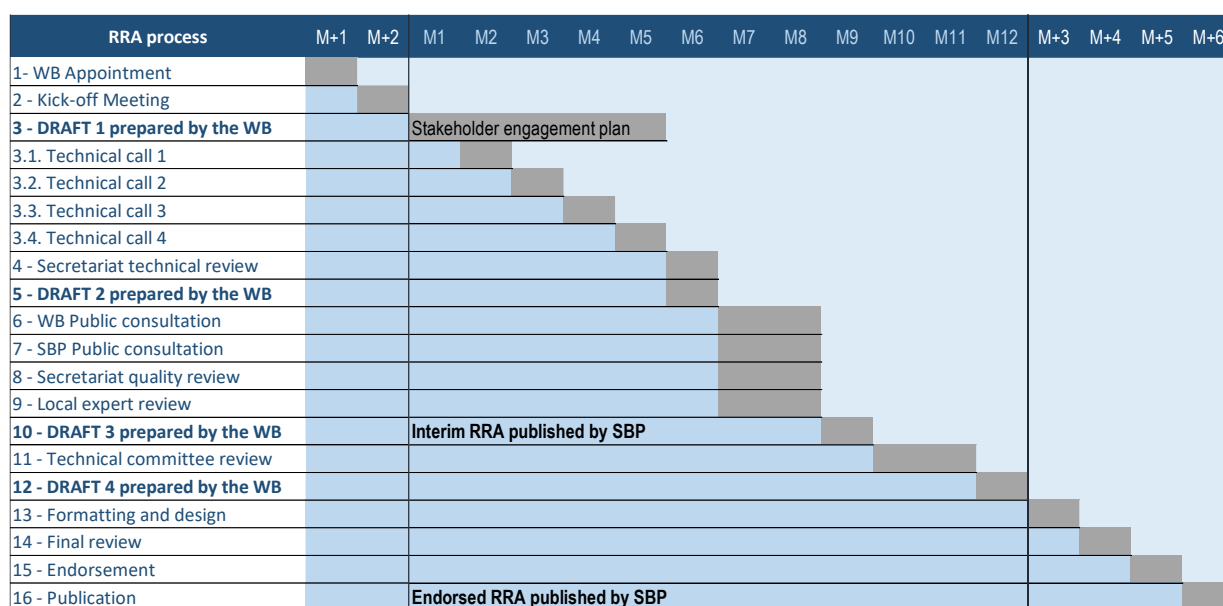


Figure 2. RRA process timeframe

- 2.8 The SBP Secretariat shall review the information provided by the WB and record its evaluation in the Checklist for the Appointment of a Working Body (Annex 4) to develop or revise the Regional Risk Assessment.
- 2.9 Once the SBP is satisfied that the information provided by the WB complies with the requirements of this procedure, the SBP CEO shall confirm the WB's appointment using a WB Nomination Letter (Annex 5).
- 2.10 SBP shall inform stakeholders about the RRA development/review process, including the WB details, on the relevant section of the SBP website.
- 2.11 SBP shall inform the Technical Committee of the development/review of a Draft RRA Report.
- 2.12 SBP shall identify and engage with a local expert to perform the local expert review.
- 2.13 SBP shall provide the WB with initial training at the start of the process.

3 Risk Assessment Report

- 3.1 The WB shall prepare the Regional Risk Assessment using the RRA report template provided by SBP for Forest (FOR) risk assessment (Annex 6.1) or Trees Outside of Forests (TOF) (Annex 6.2).
- 3.2 The WB shall assess only the relevant indicators for TOF, as outlined in Instruction Document 1A: Requirements for Trees Outside of Forests.
- 3.3 The WB shall prepare and describe all sections of the RRA report, which includes the following elements:

Contents

	Foreword
1	Introduction
2	Regional background and statement of scope
	2.1 Regional background
	2.2 Statement of scope and sub-scopes
	2.3 Overview of the local biomass sector
3	Methodology
	3.1 Data collection
	3.2 Selection of indicators to be updated
	3.3 Risk classification
4	Stakeholder consultation
5	Conclusions

Annexes

Annex 1	Detailed findings of the risk assessment
	Principle 1 – Feedstock is legally sourced
	Principle 2 – Feedstock sourcing does not harm the environment
	Principle 3 – Feedstock is only sourced from Supply Bases where the forest carbon stock is stable or increasing in the long term
	Principle 4 – Feedstock sourcing benefits people and communities
Annex 2	List of experts consulted and contacts of working body
Annex 3	List of publications used
Annex 4	List of stakeholders
Annex 5	Public consultation report
Annex 6	REDIII Level A risk assessment
	Sustainable harvesting criteria
	LULUCF criteria

Figure 3. RRA report content

- 3.4 The WB shall follow the style guidelines in the RRA template while developing the Draft RRA Report.
- 3.5 During the RRA development process, the WB shall prepare four versions of the RRA: Draft 1, Draft 2, Interim RRA (Draft 3) and Endorsed RRA (Draft 4). Please refer to the process flowchart in section 1.6 for details.
- 3.6 Only when developing Draft 3 RRA shall the WB complete Annex 5 of the RRA report, which summarises the stakeholders' comments received during the WB and SBP public consultation on the Draft 2 RRA Report and details how the WB has addressed them.
- 3.7 The WB shall use the identification code provided by SBP to identify the RRA. The naming convention for the RRA file is as shown in this example: SBP-RRA-EU-DK-FOR_v1.0_Draft, SBP-RRA-EU-DK-FOR_v1.0_Interim, or SBP-RRA-EU-DK-FOR_v1.1_Endorsed, where EU represents the region, DK indicates the country code and FOR (Forestry), TOF (Trees Outside of Forests).
- 3.8 At its discretion, the WB shall prepare translations of the Draft RRA Report considering the needs of local stakeholders. However, SBP will only endorse the version in English.

4 Risk assessment development

4.1 Applicable standards

- 4.1.1 The WB shall conduct the RRA using the latest version of
- a) The SBP Standard 1: Feedstock Compliance
 - b) SBP Standard 2: Feedstock Verification
 - c) Guidance for SBP Standard 1
 - d) Guidance for SBP Standard 2
 - e) Instruction document 1A: Requirements for Trees Outside of Forests
 - f) SBP Glossary of Terms and Definitions
- Depending on the feedstock or geographic scope of the RRA, the WB should also use the additional applicable normative documents as indicated by SBP using the latest version of the RRA template.

4.2 Gathering of information

- 4.2.1 All data used in the risk assessment shall be accurate, credible, relevant and reliable for all indicators in Standard 1. The evaluation of information should consider various factors, such as publication indexes, data providers, relevance of the information, dates of publication, methodology used for data gathering, etc. The most up-to-date information sources must be used; should sources be more than five years old, their adequacy must be verified.
- 4.2.2 Remote-sensing data sets should be used to verify or establish forest cover characteristics, carbon stock assessments, and land use patterns.
- 4.2.3 Data sources shall be referenced in the RRA Report so that external parties can verify them. When specific information is used, like precise legal requirements or thresholds, the source should be referenced with more details, e.g., page, paragraph, or table; referencing the publication or a specific web page is insufficient. The specific web link shall be provided for at least the most important evidence that supports the risk conclusion and justification
- 4.2.4 The WB shall implement the Stakeholder engagement plan (see 2.5.c) to collect information from local experts and stakeholders while drafting the RRA. The stakeholders and experts consulted shall be recorded in Annex 2 of the RRA Report Template (List of experts consulted and contacts of Working Body). The WB should consider holding stakeholder workshops to provide a forum for direct input and discussion.
- 4.2.5 The WB shall identify instances where any indicator within Standard 1 may conflict with applicable legislation and provide justification for addressing this in compliance with Standard 2.

4.3 Risk assessment

- 4.3.1 The WB shall follow Annex 7 - Guidance to complete Annex 1 of the RRA Report when developing the risk assessment.
- 4.3.2 WB shall define the scope or sub-scopes for each indicator. Sub-scopes may be used when different regional characteristics indicate a non-homogeneous risk distribution. Sub-scoping can apply to one of several Indicators. Key considerations include jurisdictional boundaries at the country, state, or regional levels, public vs private ownership, natural forests vs semi-natural or planted forests vs plantations, and certified vs uncertified areas alongside ecoregions.

- 4.3.3 The WB shall develop the risk assessment and provide and justify the risk designation for each applicable indicator of Standard 1 and corresponding scope or sub-scopes.
- 4.3.4 In its Risk Assessment, the WB shall consider all operators involved in producing, harvesting and transporting feedstock within its region(s) and impacting conformance with SBP standards.
- 4.3.5 The risk designation shall be determined by following the Risk Evaluation Framework (REF) Decision Tree (Figure 4) as outlined in the Guidance for SBP Standard 2.

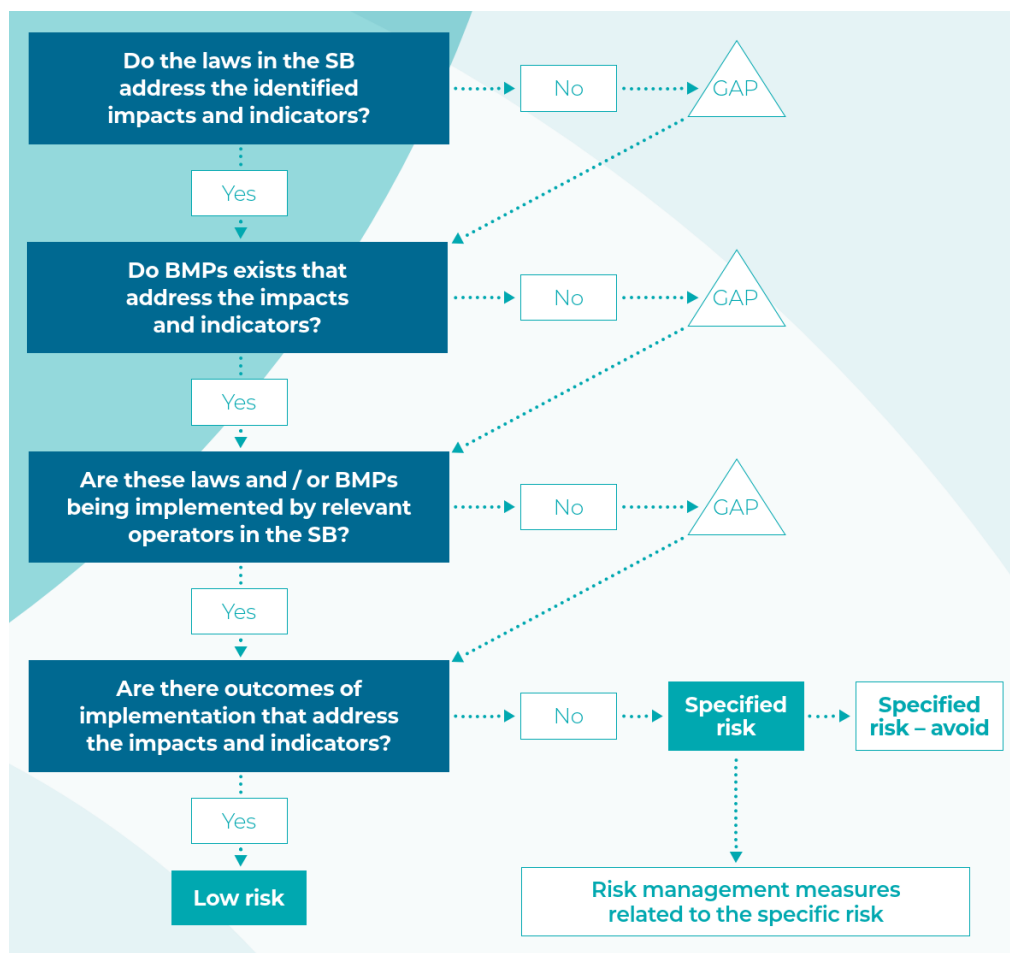


Figure 4. Risk Evaluation Framework (REF) Decision Tree

- 4.3.6 For specified risk indicators, the WB may recommend mitigation measures (MM). These recommended mitigation measures are optional for certificate holders, who may develop their own mitigation measures. The mitigation measures shall provide the means of verification (MoV) to show their adequacy and effectiveness. Such evidence may include records, documents, maps, and other relevant materials.
- 4.3.7 For low and specified risk indicators, the WB shall provide Supply Base Verifiers (SBVs), which identify the information needed in the form of evidence appropriate to the Supply Base and allow evaluating and justifying the risks associated with the Indicators of Standard 1.

4.3.8 During the risk assessment development, SBP shall provide technical support to the WB during monthly technical calls. Ahead of each monthly call, the WB shall complete and share the RRA progress report (Annex 3) and the latest version of Draft 1 RRA with SBP.

4.3.9 Once Draft 1 RRA is completed, the WB shall submit Draft 1 to SBP for a detailed technical review.

4.3.10 SBP shall review Draft 1 RRA Report, provide comments to the WB and complete Annex 8 - SBP review of Draft 1 RRA.

4.3.11 WB shall submit Draft 2 RRA Report to SBP, which will review and approve it for public consultation.

4.3.12 Once Draft 2 RRA is accepted by SBP, the WB and SBP shall organise the public consultation.

5 Public consultation

- 5.1 After submitting the Draft 2 RRA report for evaluation, the WB and SBP shall conduct a 30-day public consultation on the Draft 2 RRA Report to ensure its relevance to national/regional conditions, allow stakeholders to contribute to the RRA process and comment on the risk assessment including the risk rating.
- 5.2 The WB shall organise the public consultation concurrently with SBP and notify SBP of its start date at least two (2) weeks in advance.
- 5.3 The WB shall maintain a list of identified stakeholders and their contact details.
- 5.4 Stakeholders representing the interests listed below shall be identified and notified, unless justified, during the public consultation of an RRA. The list is not comprehensive, and any other stakeholder groups relevant to the RRA process shall also be identified and notified.

Economic interests	<ul style="list-style-type: none"> a) Relevant commodities owners and/or managers of large, medium and small commodities; b) Contractors; c) Representatives of workers and industries; d) Stakeholders in the regional biomass sector, including producers and associated supply chain actors; and e) Certificate Holders of relevant certification schemes, including but not limited to FSC, PEFC, SBP and SFI. f) Local communities' representatives; g) Indigenous peoples' representatives.
Social interests	<ul style="list-style-type: none"> a) NGOs and CSOs involved or with interest in social aspects of commodities and other related operations; b) Workers Association; c) International, national and local trade/labour unions; d) Representatives of local communities involved or with interest in commodities; e) Representatives of Indigenous peoples and/or traditional peoples; and f) Representatives of recreation interests, where present.
Environmental interests	<ul style="list-style-type: none"> a) NGOs involved or interested in the environmental aspects of commodities. Consultation should target the following areas of interest and expertise: <ul style="list-style-type: none"> - Biological diversity; - Water and soil; - High Conservation Values and - Ecosystem resilience b) Local communities' representatives; c) Indigenous peoples' representatives.
Certification Bodies that are actively involved in forest certifications within the country	
National and state agencies	
Experts in the relevant commodity and other relevant feedstock categories	
Research institutions and universities	
Official representatives of certification schemes for the relevant commodities (for example, FSC, PEFC, SFI) from offices in the region	

- 5.5 SBP and the WG shall run the public consultation on Draft 2 RRA for at least thirty (30) days.
- 5.6 Information sent to stakeholders for consultation shall include the following:
- a) A brief description of the SBP certification scheme, including direct reference to the current version of SBP Standard 1 and SBP Standard 2;
 - b) A brief description of the purpose of the RRA, the scope of the risk assessment and the objective of the public consultation, including a request for comments;
 - c) The start and end dates of the public consultation period;
 - d) The Draft 2 RRA Report;
 - e) Contact details of the WB and SBP;
 - f) An indicative timeline for the completion of the proposed RRA (it should be made clear that the timetable is only an estimate);
 - g) A statement that anonymised comments will be published unless confidentiality is requested; and
 - h) A statement that the RRA process is aligned with this SBP RRA Procedure.
- 5.7 The WB shall proactively seek input from representatives of identified stakeholders and use various appropriate means to contact them. The WB shall particularly develop an adapted method to seek input from under-represented and disadvantaged stakeholder groups and shall aim for gender parity in participation
- 5.8 Consultation techniques may include face-to-face meetings, personal contact by phone or letter, notices published in the national and/or local press and on relevant websites, local radio announcements, announcements on local customary notice boards in the language of the local people, and emails in the language of the recipients.
- 5.9 The WB is responsible for facilitating culturally appropriate outreach to representatives of all identified stakeholders.
- 5.10 The SBP Secretariat shall announce the public consultation on its website and allow comments to be shared directly with SBP.
- 5.11 SBP shall share the comments from stakeholders with the WB, which will acknowledge receipt and ensure proper records.
- 5.12 The WB shall gather all stakeholder comments received during the public consultation and prepare a response for each comment in Annex 5 of the RRA Report (Public consultation report). Based on the stakeholders' comments, the WB may consider updating the relevant indicators.
- 5.13 The WB shall communicate the Draft 3 RRA Report with Annex 5 - The Public consultation report completed to the SBP.
- 5.14 The WB shall respond to all stakeholders participating in the consultation process, explaining how their feedback was considered. This feedback shall be shared with stakeholders before the Draft 3 RRA Report is published as an Interim RRA.
- 5.15 Where substantive issues have been identified during the public consultation, the WB shall consider the need for an additional 30-day consultation in consultation with SBP. Additional rounds of consultation may be undertaken.

6 Interim Regional Risk Assessment

- 6.1 To prepare for the SBP-interim RRA, SBP shall organise Local expert and SBP quality reviews during the public consultation process.
- 6.2 The appointed Local expert shall review the Draft 2 RRA Report using the Checklist for the local expert's review of Draft 2 RRA (Annex 9) and assess the adequacy of the RRA content or identify points of improvement for the preparation of the Interim RRA.
- 6.3 SBP shall conduct a quality review of Draft 2 RRA Report to ensure that the RRA is clear, rigorous, credible, and easy to navigate and that the RRA template has been appropriately followed. SBP will provide its final comments to the WB using Draft 2 RRA Template.
- 6.4 SBP shall communicate Draft 2 RRA to the WB, which includes:
 - a) SBP quality review final comments;
 - b) Local expert comments and Annex 9; and
 - c) Stakeholder comments from the SBP public consultation.
- 6.5 WB shall address the comments made by SBP, the local expert, and stakeholders (both SBP and WB public consultation) and submit Draft 3 RRA to SBP for approval.
- 6.6 The SBP Secretariat shall review the Draft 3 RRA report and determine whether to submit the finalised version for approval by the SBP Technical director as an Interim RRA.
- 6.7 SBP shall communicate the decision to the WB.
- 6.8 In cases where the Draft 3 RRA Report is rejected, SBP shall explain the reasons for rejection to the WB and may suggest improvements or revisions.
- 6.9 In cases where the Draft 3 RRA Report is approved, SBP may publish it as SBP-interim RRA Report on the SBP website and notify certificate holders and TC.
- 6.10 Publication of the SBP-Interim RRA report is optional, and SBP may opt to skip this process and proceed with the endorsement process of the Draft 3 RRA Report as described in Section 7.

7 Endorsed Regional Risk Assessment

- 7.1 To prepare for SBP-endorsed RRA, SBP shall organise the technical committee review.
- 7.2 After Draft 3 of the RRA Report is approved, SBP will submit it to TC for review and recommendation for endorsement. At least two TC members shall conduct the TC review. TC shall review the Draft 3 RRA Report using the Checklist for the technical committee's review of Draft 3 RRA (Annex 10).
- 7.3 SBP shall review TC comments, discuss any unclarities with the TC, and communicate the Draft 3 RRA to the WB, including TC comments and Annex 10, if any.
- 7.4 The WB shall address the TC's comments and amend the Draft 3 RRA Report accordingly. The WB shall then submit the final Draft 4 RRA Report to SBP for review.
- 7.5 The SBP Technical Director and the Technical Committee review and recommend that the final regional risk assessment document, Draft 4 RRA Report, be submitted to the CEO for approval and sign-off.
- 7.6 SBP shall communicate the decision to the WB and TC.
- 7.7 In cases where the Draft 4 RRA Report is rejected, SBP shall explain the reasons for rejection to the WB and may suggest improvements or revisions.
- 7.8 In cases where the Draft 4 RRA Report is endorsed, SBP shall publish the SBP-endorsed RRA Report on the SBP website and notify certificate holders.

8 Revision of Endorsed Regional Risk Assessment

8.1. Validity and revision scenarios for an SBP-endorsed RRA

8.1.1 SBP-endorsed RRAs typically remain valid for five (5) years from the publication date by SBP.

8.1.2 If SBP Standards 1 and 2 are revised, a revision of SBP-endorsed RRAs may be required. SBP-endorsed RRAs requiring revision shall be revised within the transition period accompanying the revised Standards and normative documents. The end of the transition period shall define the end of the validity of an SBP-endorsed RRA and overrules 8.1.1.

8.1.3 Revisions of an SBP-endorsed RRA may be implemented in three ways:

- a) Administrative update of the RRA, or
- b) Through rapid revision, or
- c) Through regular revision.

8.1.4 The validity of an SBP-endorsed RRA may be extended in the following cases:

- a) The RRA revision process has started but is not expected to be completed before the validity expires. In this case, the validity of the SBP-endorsed RRA may be extended for up to twelve (12) months.
- b) SBP Standards 1 and 2 are undergoing review and revision, but that process is incomplete. In this case, an extension of the validity may be proposed to coincide with the transition period for the revised Standards.

8.2 Administrative Update of an SBP-endorsed RRA

8.2.1 Administrative Updates to an SBP-endorsed RRA shall not affect the risk designations and shall be implemented according to need and urgency.

NOTE: Update(s) may include, but are not limited to, improving the document's clarity based on user feedback, adapting to new templates, or amending typographic or translation errors. Other information, such as information sources, can be updated if they improve the robustness of the document without implying a change in risk rating.

8.2.2 SBP or the WB might carry out an administrative update.

8.2.3 In case of an update, the SBP-endorsed RRA shall be given a new second-level version number (e.g., v1.1, v1.2, etc.).

8.2.4 A public consultation is not required for an administrative update.

8.2.5 SBP may consult the WB for input if relevant.

8.2.6 The TC shall review the Updated Draft RRA Report, which shall summarise the administrative changes included in the new version, and if a positive recommendation is made, the updated RRA is submitted to the SBP CEO for endorsement.

8.3 Rapid Revision of an SBP-endorsed RRA

- 8.3.1 During the five-year validity of an SBP-endorsed RRA, the SBP, the TC, the SC, or any stakeholders may make a case for a Rapid Revision to an RRA. A request for Rapid Revision of an SBP-endorsed RRA shall be submitted to SBP and shall include:
- a) A detailed description of the change(s) proposed;
 - b) Clear objective evidence supporting the change; and
 - c) Any other supportive information (e.g. feedback from stakeholders).

NOTE: Examples of clear objective evidence may include changes in legislation, the results of complaints handled by SBP, and newly published scientific evidence.

- 8.3.2 SBP shall evaluate requests for a Rapid Revision and ask the TC to evaluate the suitability of the request. SBP shall only proceed following a positive recommendation from the TC.
- 8.3.3 In accordance with the TC, SBP will adapt the revision process to the scale and complexity of the revision. SBP shall publish the outline of the agreed process for each Rapid Revision.
- 8.3.4 SBP shall conduct a public consultation on the proposed changes to the Rapid Revision Draft RRA Report for at least thirty (30) days.
- 8.3.5 SBP or the WB shall address the comments received during the public consultation and update the Draft RRA Report.
- 8.3.6 The TC shall review the Rapid Revision Draft RRA Report, and if a positive recommendation is made, the Draft RRA Report will be submitted to the SBP CEO for endorsement.

8.4 Regular Revision of an SBP-endorsed RRA

- 8.4.1 No later than eighteen (18) months before the end of the validity period of an SBP-endorsed RRA, the SBP shall review the continued relevance and effectiveness of an SBP-endorsed RRA. SBP should seek input from a previous WB and other experts. The review shall consider the following information:
- a) New or changed legislation or best practices;
 - b) Update to Annex 2 - Stakeholder concerns document and collection of information on sustainability risks and reports in the region
 - c) The results of SBP's Monitoring and Evaluation and Assurance activities; and
 - d) All stakeholder comments related to the RRA received since the last endorsement of the RRA.
 - e) Updates of the SBP normative framework.
- 8.4.2 SBP shall create a report summarising the results and conclusions of the review process. The report shall include a recommendation as to whether the SBP-endorsed RRA merits re-approval or requires revision. Re-approval means re-publishing the same SBP-endorsed RRA Report for a period not exceeding five (5) years without changes.
- 8.4.3 When re-approval is recommended, SBP shall conduct a public consultation seeking feedback on the proposed re-approval. The consultation period shall be for at least thirty (30) days. Following the close of the public consultation period, SBP shall review all comments received and share them with the TC to seek their view and recommendation to either re-approve the RRA or revise the RRA.
- 8.4.4 If the TC recommends a regular revision of the RRA, SBP shall undertake the revision according to the requirements for initial RRA development specified in this Procedure.

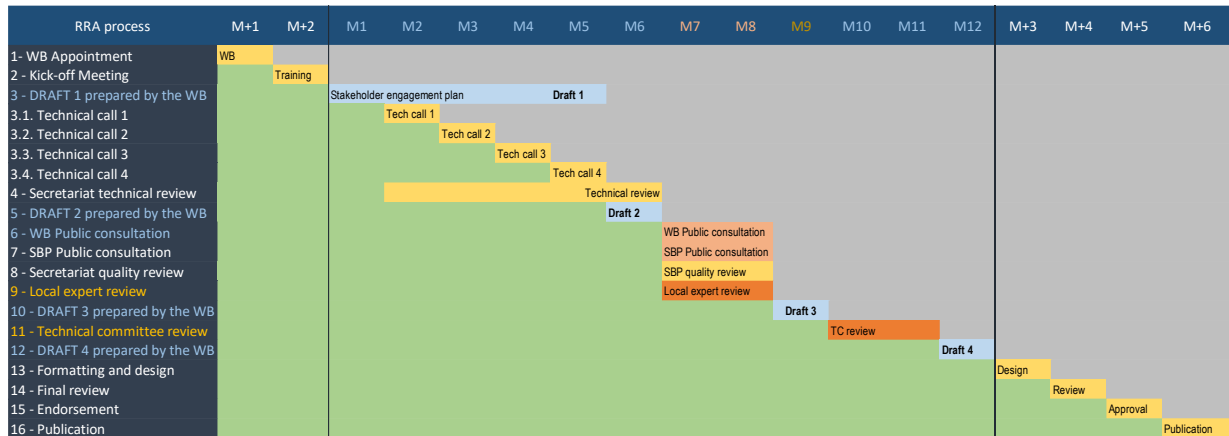
8.5 RRA transition period

- 8.5.1 The RRA transition period is when a certificate holder shall adapt its Supply Base Evaluation and implement updated mitigation measures per the revised SBP-endorsed RRA and Standard 2.
- 8.5.2 The transition period for an Update or Revision of SBP-endorsed RRA shall be twelve (12) months from publication.
- 8.5.3 In the case where the revision of an SBP-endorsed RRA resulted from the revision of Standards 1 and 2, and when the end of 12 months transition period for the updated RRA occurs before the end of the transition period of the updated standard, the end of the RRA transition period shall take precedent on the end of the revised Standards transition period.
- 8.5.4 The SBP may publish an SBP-interim RRA for a specific region. This allows Certificate Holders to develop and implement mitigation measures while Certification Bodies certify these Certificate Holders until an SBP-endorsed RRA for the region is made available. If the risk ratings in the final SBP-endorsed RRA change from low to specified compared to the interim RRA, the certificate holder must update its Supply Base Evaluation accordingly. There will be a 6-month transition period for the organisation to implement the SBP-endorsed RRA, which will be subject to verification during the Certification Body's next surveillance audit.

9 Exception to Regional Risk Assessment Procedure

- 9.1 In exceptional circumstances (for example, during a review and revision of SBP Standards), SBP may need to deviate from the RRA Procedure.
- 9.2 SBP shall develop a proposed plan for implementing an exception and submit it to the TC for review.
- 9.3 The TC shall consider recommending approval of the exception after taking into consideration at least the following:
 - a) The need for deviation;
 - b) Ensuring the credibility of the SBP-endorsed RRA revision process;
 - c) Ensuring transparency, participation and fairness in the process; and
 - d) Compliance with international best practices for standards development.
- 9.4 If the TC recommends an exception, SBP shall make publicly available (through publication on the SBP website) an explanation and justification for the deviation from the RRA Procedure.

Annex 1 - RRA work plan



Annex 2 - Stakeholder concerns

The SBP Regional Risk Assessment Procedure specifies that the WB shall research relevant sources of information (for example, websites of relevant NGOs, media articles, social media, scientific reports and studies) to identify stakeholder concerns that could be relevant to the RRA process.

Relevant sources of information to identify stakeholder concerns should be linked with at least one of the SBP criteria from SBP ST 1. The WB will conduct a technical review of the publicly available information regarding:

- Operators and operations are legal.
- Biodiversity is maintained or enhanced.
- Ecosystem productivity, functions, and services are maintained or enhanced.
- Feedstock sourcing is consistent with international requirements for land use, land-use change and forestry (LULUCF) emissions.
- Carbon stocks in the forest area of the Supply Base are stable or increasing in the long term.
- Feedstock sourcing shall not compete with wood sourcing for long-lived wood products.
- Decent working conditions are provided, and labour rights are safeguarded.
- Feedstock sourcing benefits communities.

Source of information	Year	Criteria	Summary	Indicator
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Annex 3 - RRA progress report

PROGRESS REPORT FOR DRAFT 1 RRA													
RRA:	SBP review	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Date:	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1. Introduction	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2. Background	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3. Methodology	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4. Stakeholder	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5. Conclusions	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Principle 1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1.1.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1.1.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1.1.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1.1.4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1.1.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Principle 2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.1.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.1.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.1.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2.2.12	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Principle 3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.1.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.2.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.2.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.2.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3.3.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Principle 4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.1.10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4.2.7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
RED Level A	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Annex 4 - Appointment of a WB

The SBP Regional Risk Assessment Procedure specifies that the appointment of a WB to develop or revise a Regional Risk Assessment is based on the requirements outlined in section 2 of the RRA procedure. The information to be provided to the SBP Secretariat is listed below.

Working body (name, address, website):

Sponsoring body (if different):

Coordinator (name/email/phone):

The geographic scope of the assessment:

RRA procedure requirement	Evidence to confirm compliance
2.4 Before the appointment of a WB, SBP shall review and confirm that a WB:	
a) has demonstrable necessary competence, knowledge and experience in including but not limited to the following: <ul style="list-style-type: none"> a. ecological and social values b. carbon and climate regulations c. business management practices d. the operation of suppliers and contractors, including management systems and products e. SBP requirements f. Due Diligence Systems (DDS) g. stakeholder engagement h. supply chain within the region(s); 	
b) has sufficient, suitably qualified staff and resources to perform the risk assessment;	
c) can demonstrate competence in the application and interpretation of SBP requirements and Standards, including the requirements identified in this RRA Procedure in the context of the region in which the RRA is developed;	
d) has relevant knowledge of the language, laws and customs of the region(s) in which the WB will operate;	
e) has relevant knowledge of the EU RED legislation;	
f) has effectively managed any real or perceived conflict of interest which could affect the objectivity of the work and	
g) accepts the rules and procedures laid down by SBP for developing, approving, and revising the RRA.	
2.5 The WB shall ensure to provide the following information to SBP before engaging in the risk assessment development:	

a) Prepare a documented timeline using Annex 1 - RRA work plan	
b) Prepare a draft stakeholder/expert consultation list;	
c) Develop a consultation plan to collect information from local experts and stakeholders during the drafting of the RRA, as it constitutes an essential source of information. In-person meetings or seminars should be included in the stakeholder engagement plan;	
d) Identify stakeholder concerns using Annex 2 - Stakeholder Concerns by identifying relevant sources of information (for example, websites of relevant NGOs, media articles, social media, scientific reports and studies) that could be relevant to the RRA;	
e) Determine the 'geographic scope' of the assessment, taking into consideration the homogeneity of the region(s);	
f) Rationalise using "sub-scopes" if applicable or justify if not applicable.	
g) Appoint a Co-ordinator who is responsible for facilitating and managing the development of the RRA according to the requirements of this Procedure and be the contact point with the SBP Secretariat;	

Annex 5 - WB Nomination letter

[Sending address]

[Name]

[Address]

[Address]

[Address]

[Date]

Subject: WB Appointment – SBP-endorsed RRA

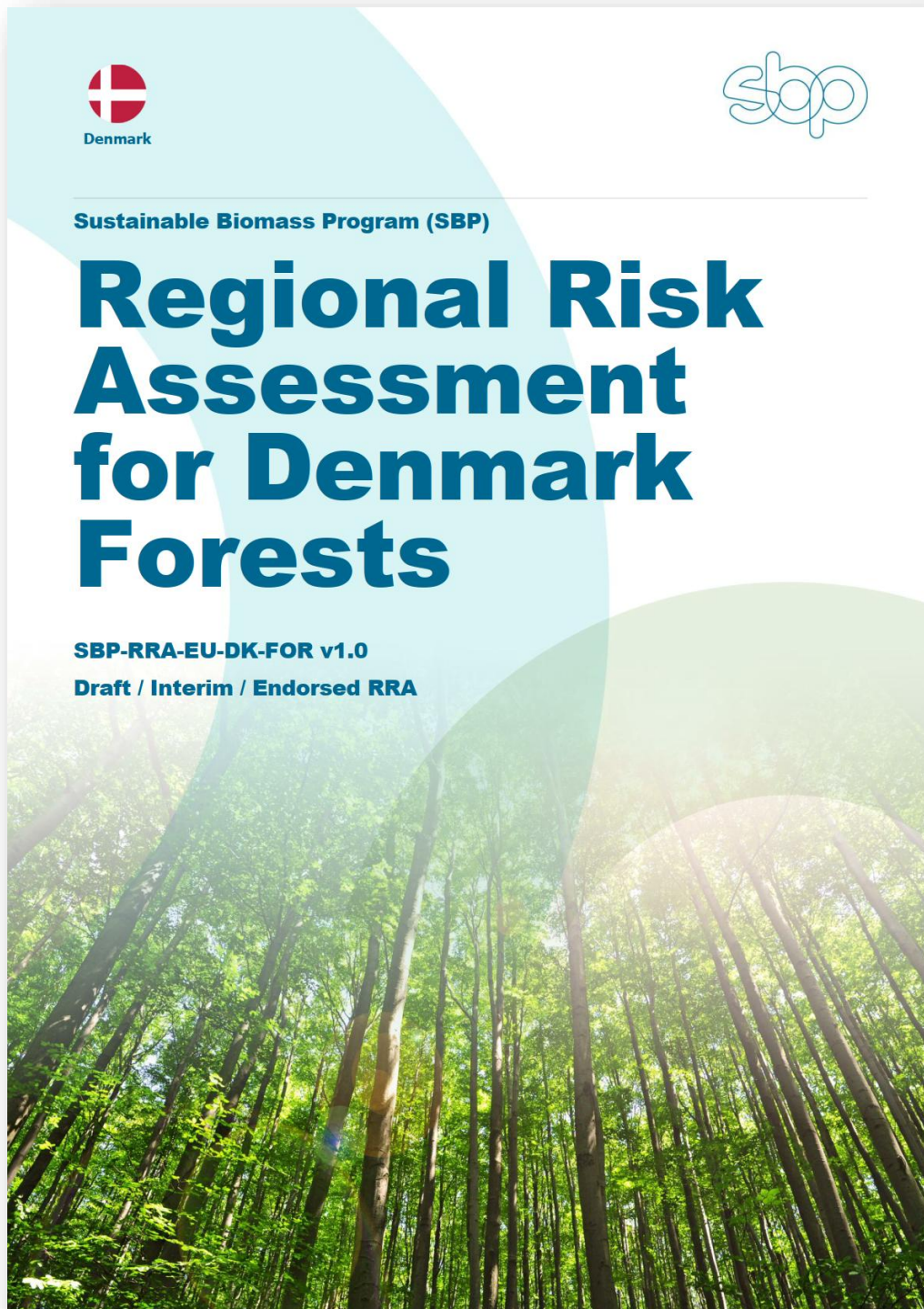
Dear

This is to inform you that the SBP Secretariat has reviewed the information you have provided and appointed you as the Working Body (WB) for the development of the SBP-endorsed Regional Risk Assessments for

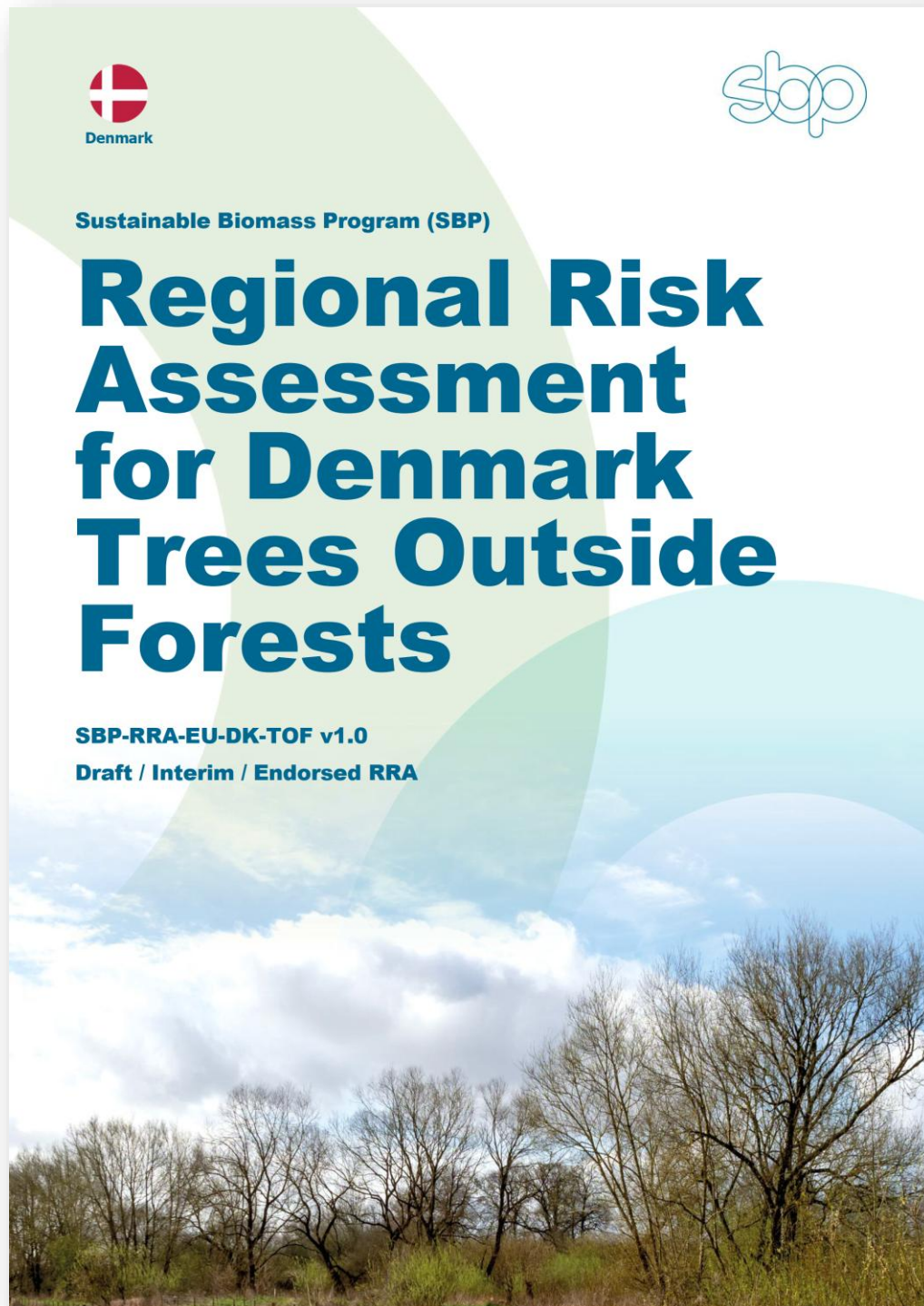
Yours sincerely,

Carsten Huljus
Chief Executive Officer

Annex 6.1 - SBP_RRA_Template_FOR



Annex 6.2 - SBP_RRA_Template_TOF



Annex 7 - Guidance to complete Annex 1 of the RRA Report

The specific principle, criterion, and indicator given here are used solely to illustrate the annexe. This Annex is intended for the Working Body drafting the RRA report.

Principle 1 – Feedstock is legally sourced

Criterion 1.1 – Operators and operations are legal

1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.

Findings

Scale of assessment

The text shall describe the scope or sub-scopes relevant to the analysis, enforcement, and risk conclusions specific to the indicator. Key considerations include jurisdictional boundaries at the country, state, or regional levels, public vs private ownership, natural forests vs semi-natural or planted forests vs plantations and certified vs uncertified areas alongside ecoregions.

If the analysis and risk conclusions are divided into sub-scopes, those sub-scopes will be detailed here. This indicates that the subsequent analysis shall provide specific information about each sub-scope.

Analysis of the legal requirements and best practices

Please concentrate on the local context. Do not describe the intent of the indicator or provide definitions. Begin with the national and regional (as relevant) context, then discuss the legal requirements and available best practices or operating procedures, whether documented or not.

Connect your analysis with all references included in the Evidence Reviewed section, summarising the requirements the evidence presents. If the information pertains solely to enforcement, monitoring, and outcomes, describe it in the next section, "enforcement, monitoring and outcomes". Use only relevant findings and keep the description as concise as possible.

For each indicator, the average content of the findings should fit on one page and not exceed two pages. Any content above two pages must be discussed with SBP before drafting.

Enforcement, monitoring and outcomes

Please describe the implementation mechanisms at the local level, focusing on how agencies, institutions, and/or other entities are empowered for enforcement and monitoring. To the best extent possible, the outcomes analysis should rely on publicly available monitoring results, statistics, reports, and studies.

When considering monitoring, adopt a broader approach that includes organisations involved in nature conservation and restoration or social and human rights-focused organisations which provide credible monitoring reports.

Please keep the description concise, not exceeding one page.

	<p>Risk conclusion and justification</p> <p>It is essential to justify low-risk and specified-risk designations equally. A brief paragraph is required to explain the reasoning behind the designation. In this section, do not reference the preceding sections.</p> <p>Positive outcomes can support a low-risk designation, regardless of the presence of legislation or enforcement. Conversely, when there are no positive results, enforcement, or legislation, the situation typically leads to a specified risk designation after evaluating risk as a function of probability and impact. Please consult the Risk Evaluation Framework (REF) Decision Tree from the Guidance for SBP Standard 2.</p> <p>In cases where the risk is not clearly classified as 'low' or 'specified,' it is essential to consider the risk as a function of probability and impact before concluding. Any risk that cannot be justified as 'low' should be concluded as 'specified.'</p> <p>In this section, do not use the phrase "based on the evidence above." Instead, summarise the legal framework, enforcement mechanisms, and outcomes that support the justification in at least one paragraph.</p> <p>The risk conclusion and justification should not exceed half a page.</p>
<p>Mitigation measures</p>	<p>Recommended mitigation measures that are optional and may be replaced by the certificate holder with alternative risk management activities.</p> <p>The mitigation measure shall provide the means of verification to show its adequacy and effectiveness. Such evidence may include records, documents, maps, and other relevant materials.</p>
<p>Supply Base Verifiers</p>	<p>Supply Base Verifiers (SBVs) identify the information needed in the form of evidence (also called means of verification) that is appropriate to the Supply Base and which allows to evaluate and justify the risks linked to the Indicators of Standard 1</p> <p>Identify the required evidence, including objective information and sources relevant to the supply base. This will enable the evaluation and justification of positive outcomes for low-risk situations or the effectiveness of risk mitigation management for specified risks.</p>
<p>Evidence reviewed</p>	<p>Please provide the source of information used to describe the findings above. Include the URL for the most important evidence, and if available, provide URLs for all relevant evidence.</p> <p>List only the evidence referenced in the findings. Specify the particular paragraphs, pages, or tables of the sources.</p> <p>Examples of evidence include national legislation, regional regulations, EU regulations, international regulations, Forestry Best Management Practices, Forestry Operating Procedures, monitoring results, national forest inventory, national statistics on forestry, expert consultation, stakeholder consultation (direct discussions with stakeholders, excluding public consultations), UN Nationally Determined Contributions, UN National Inventory Submissions, and the FAO Global Forest Resources Assessment, as well as the Corruption Perceptions Index and Worldwide Governance Indicators, among others.</p>
<p>Risk rating</p>	<p>Low risk Specified risk</p>

Annex 8 - SBP review of Draft 1 RRA

The SBP Regional Risk Assessment Procedure requires the SBP to review the Draft 1 RRA report prepared by the appointed WB as specified under 4.3.9 of the SBP RRA Procedure.

RRA:

New RRA or RRA revision:

WB:

Review date:

Reviewed by:

*For partial compliance, please select NO.

RRA procedure requirements	Compliance*	Comments
Applicable standards		
The WB shall conduct the RRA using the latest version of the RRA template against the latest versions of SBP Standards 1: Feedstock Compliance and Standard 2: Feedstock Verification.	Please select	
WB has followed the style guidelines in the RRA template while developing the Draft RRA Report.	Please select	
Regional Risk Assessment Report		
Has the WB sufficiently described the regional background (including ecological and socio-economic characteristics of the forestry, TOF context)?	Please select	
Has the WB described the statement of the scope and sub-scopes?	Please select	
Has the WB provided an adequate overview of the local biomass sector?	Please select	
Has the WB described the data collection section?	Please select	
Has the WB described the indicators that need to be updated?	Please select	

Has the WB described the risk classification?	Please select	
Has the WB described the stakeholder consultation?	Please select	
Has the WB described the conclusions?	Please select	
Has the WB completed the Conclusions in line with the risk assessment outcomes? All sub-scopes are reflected in the Conclusions table.	Please select	
Has the WB described the List of experts consulted and contacts of the Working Body?	Please select	
Has the WB described the List of publications used?	Please select	
Has the WB described the List of Stakeholders?	Please select	
Has the WB described the RED Level A risk assessment, including the LULUCG criteria?	Please select	
Risk assessment		
All data used in the risk assessment shall be relevant to all applicable indicators in Standard 1. The most up-to-date information sources must be used; if sources are over five years old, their adequacy must be verified.	Please select	
Where practicable, remote-sensing data sets should be used to verify or establish forest cover characteristics, carbon stock assessments, and land use patterns	Please select	
Has the WB defined the scale of assessment for each indicator and used it in the risk assessment and risk designation?	Please select	
Are data sources referenced in the Draft RRA Report so that external parties can verify them?	Please select	
Are information and data gathered accurate, relevant and credible	Please select	

(data sampling is possible when reviewing)? When specific information is used, like precise legal requirements or thresholds, the source should be referenced with more details, e.g., page, paragraph, or table; referencing the publication or a specific web page is insufficient.		
Has the WB followed the Risk Evaluation Framework (REF) Decision Tree for risk designation, as outlined in the Guidance for SBP Standard 2?	Please select	
Has the WB provided a rationale for the risk rating for each SBP STD1 indicator (and per sub-scope, if applicable)?	Please select	
Has the WB provided recommended mitigation measures? Has de WB described the means of verification for the mitigation measures? Such evidence may include records, documents, maps, and other relevant materials.	Please select	
Has the WB provided the Supply Base Verifiers (SBVs) appropriate to the Supply Base and that allow evaluation and justification of the risks linked to the Indicators of Standard 1?	Please select	
Has the WB correctly identified instances where any indicator within Standard 1 may conflict with applicable legislation? Has the WB justified addressing this in compliance with Standard 2?	Please select	
SBP evaluation results		
Can the SBP approve Draft 1 RRA for public consultation after the technical review?	Please select	
If yes, or if not, please provide details and justify them with conditions.	Please select	

Annex 9 – Local expert review of Draft 2 RRA

The SBP Regional Risk Assessment Procedure requires the local expert to review the Draft 2 RRA report prepared by the appointed WB, as specified under 6.2 of the procedure.

RRA:

New RRA or RRA revision:

WB:

Review date:

Reviewed by:

*For partial compliance, please select NO.

RRA procedure requirements	Compliance*	Comments
Geographic scope		
<p>Within the RRA Statement of Scope, has the WB clearly described the area/ extent of the region under assessment (i.e. the 'geographic scope' of the assessment)?</p> <p>Does this include a map that reflects the statement of scope description?</p>	Please select	
Sub-scopes		
<p>How has the WB considered, described and justified the homogeneity of the region under assessment? Based on homogeneity, has the WB identified the sub-scopes for STD1 indicators? Has the WB clearly delineated/mapped (if possible) or described the sub-scopes?</p>	Please select	
Regional Risk Assessment Report		
<p>Has the WB sufficiently described the regional background (including ecological and socio-economic characteristics of the forestry, TOF context)?</p>	Please select	
<p>Has the WB provided an adequate overview of the local biomass sector?</p>	Please select	

Gathering information		
Has the WB adequately identified and used evidence relevant to local legislation and practices and identified locally relevant proofs of enforcement of regulation or practices where relevant for each Indicator of SBP Standard 1?	Please select	
Is the evidence used to assess the risks based on current and objective sources? Is the evidence locally pertinent (for example, publication indexes, data providers, relevance of the information considering the validity date of the risk assessment, dates of publication, methodology used for data gathering, etc.?)	Please select	
Did the WB engage with locally knowledgeable technical experts during the information-gathering phase for indicators in SBP STD1?	Please select	
Are the data sources referenced by the WB in the Draft RRA Report locally adequate (i.e. so that they are verifiable by external parties)?	Please select	
Has the WB correctly identified instances where any indicator within Standard 1 may conflict with applicable local legislation? Has the WB justified addressing this in compliance with Standard 2?	Please select	
Risk assessment		
Has the WB provided recommended mitigation measures that are appropriate for the supply base? Has de WB described the means of verification for the mitigation measures? Such evidence may include records, documents, maps, and other relevant materials.	Please select	
Has the WB provided the Supply Base Verifiers (SBVs) appropriate to the supply base and that allow evaluation and justification of the risks linked to the Indicators of Standard 1?	Please select	

Public consultation		
<p>Has the WB identified (Annex 4 of RRA) and engaged with relevant local stakeholders according to SBP RRA Procedure, considering national/regional conditions, who represent the following groups:</p> <p>Economic Interests, Social Interests, Environmental Interests, Certification Bodies, National and state forest agencies, Experts in Control Wood, Research institutions and universities, Official representatives of forestry certification schemes (for example, FSC, PEFC, SFI) from regional offices?</p> <p>Has the WB justified any stakeholder gaps?</p>	Please select	
<p>Has the WB reported if /how it has facilitated culturally appropriate outreach to representatives of identified stakeholders?</p>	Please select	
Local expert evaluation results		
<p>Local expert general comments and conclusion</p>	Please select	

Annex 10 - TC review of the Draft 3 RRA

The SBP Regional Risk Assessment Procedure requires the Technical Committee to review the Draft 3 RRA report prepared by the appointed WB as specified under 7.2 of the SBP RRA Procedure.

RRA:

New RRA or RRA revision:

WB:

Review date:

Reviewed by:

*For partial compliance, please select NO.

RRA procedure requirements	Compliance*	Comments
Risk assessment		
Has the WB followed the Risk Evaluation Framework (REF) Decision Tree for risk designation, as outlined in the Guidance for SBP Standard 2?	Please select	
Is the risk conclusion and justification sufficiently detailed and in line with the risk assessment findings for each SBP STD1 indicator and each sub-scope, if applicable?	Please select	
Has the WB recommended appropriate mitigation measures for the supply base? Has de WB described the means of verification for the mitigation measures? Such evidence may include records, documents, maps, and other relevant materials.	Please select	
Has the WB provided appropriate Supply Base Verifiers (SBVs) for the Supply Base to effectively evaluate and justify the risks linked to the Indicators of Standard 1?	Please select	
Regional Risk Assessment Report		
Is the Public Consultation Report provided in the RRA Report Annex 5 sufficient to confirm that SBP and WB completed the public	Please select	

consultation in line with the RRA procedure?		
TC evaluation results		
Is the RRA clear, rigorous, credible and easy to navigate?	Please select	
Do the TC reviewers require the WB to correct the shortcomings of the reports before endorsement?	Please select	
Do the TC reviewers recommend the endorsement of the RRA?	Please select	
If yes, or if not, please provide details and justify them with conditions.	Please select	