



# NEPCon

## Risk Assessment Development Procedure

*Version 1.0 [DRAFT]*

NEPCon Procedure	
Type of document:	NEPCon Procedure
Title:	Risk Assessment Development Procedure
Scope:	Global
Status of document:	Draft
Version:	1.0
Date:	6 October 2017
Official Language(-s)	English
Approval body:	NEPCon
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*This procedure has been adapted from reference sources: Annex A of The Development and Approval of FSC® National Risk Assessments FSC-PRO-60-002 V3-0 EN and National Risk Assessment Framework FSCPRO-60-002a V1-0 EN FSC® and the SBP Regional Risk Assessment Procedure.*



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## A. Objective

The objective of this procedure is to provide a clear, transparent, and unambiguous methodology for developing, maintaining, revising, evaluating, and approving NEPCon Risk Assessments for countries or regions (Risk Assessments or RA).

## B. Scope

This document specifies the requirements and procedures to develop, maintain and revise Risk Assessments. It also specifies requirements and procedures for NEPCon to evaluate and approve such Risk Assessments.

All aspects of this procedure are considered to be normative, including the scope, effective date, references, terms and definitions, tables, addenda and annexes, unless otherwise stated.

## C. Terms and definitions

**Approved Risk Assessment** – The Risk Assessment that has been approved by the Technical Committee and Executive Director of NEPCon in accordance with these procedures.

**Consultation Draft Risk Assessment (Consultation Draft RA)** – the version of the Risk Assessment prepared by the TM and CE for the Stakeholder Consultation.

**Country Risk Profile** – A webpage on the NEPCon Sourcing Hub that summarises the information contained in the RA, contains the Approved Risk Assessment and Stakeholder Consultation Report.

**Country/Region Expert (CE)** – A consultant engaged to assist with the development of an RA. They shall be experienced professionals with a detailed understanding of the country/regional context and system, including an understanding of the legal system governing the commodity in question. The CE may, in some circumstances be a NEPCon Staff Member.

**Final Draft Risk Assessment (Final Draft RA)** – The version of the Risk Assessment prepared by the TM after the consultation for the approval of the Technical Committee and the Executive Director of NEPCon.

**In-Country Experts** – country/region level experts with knowledge and experience in relevant aspects of the RA. May include academics/researchers or representatives from relevant government agencies. In-country experts are interviewed during the development of an RA to ensure the credibility of the information contained there-in.

**Low risk** - when evidence indicates that the low risk threshold(s) are met, and there is no other information that would lead to a 'specified risk' designation.

**NEPCon Proponent** – The NEPCon staff member who has received the request from a client or the relevant Project Manager to initiate a new risk assessment process.

**Proposal to Develop a New Risk Assessment** – A proposal for a new risk assessment process to be commenced. The proposal shall include: Objective; Scope of the RA, including geographical area and source types; Timetable of the RA process, including start date and tentative date of submission of the final draft to the NEPCon Technical Committee; and Estimated budget and description of how funds have been or shall be secured. The proposal to develop an RA shall be submitted in the **Template Proposal to Develop a New Risk Assessment**.

**Risk Assessment (RA)** - A report analysing and designating the risk of sourcing from 'unacceptable' sources in a country or region, developed according to the relevant standard.

**Risk Assessment Approval Package** – The package of document prepared by the TM and submitted to the Technical Committee for approval. The Risk Assessment Approval Package shall include the Final Draft Risk Assessment; NEPCon Sourcing Hub Country Risk Profile content; Stakeholder Consultation Report; and the completed Risk Assessment Development Checklist.

**Risk Assessment Development Checklist** – A checklist completed by the TM that tracks the progress of the development of the Risk Assessment.

**Specified risk** - when available means of verification do not show evidence that the low risk category is met; or that one of more specific risk area was identified.

**Stakeholder Consultation Package** – The package of documents to be sent to stakeholders for the stakeholder consultation conducted in accordance with Annex A.

**Stakeholder Consultation Report** – A report prepared by the TM that includes a summary of the issues raised in the stakeholder consultation and how they were addressed; an analysis of the range of stakeholder groups who submitted comments; and an unedited copy of all comments as an Annex to the report. The Stakeholder Consultation Report shall be published on the NEPCon Sourcing Hub.

**Stakeholder Map [COUNTRY]** – A map of the relevant stakeholders in the country/region to be targeted during the stakeholder consultation. The Map is prepared using the Template Stakeholder Map [Country].

**Task Manager (TM)** – The NEPCon staff member who is responsible for facilitating and managing the RA process, including managing the assessment process, preparing draft and final RA reports, and conducting stakeholder consultations, according to the requirements of this procedure. The TM shall have the necessary experience and competences (including language skills required for the geographical scope of the assessment).

**Technical Committee** – Made up of the NEPCon Responsible Sourcing Programme Manager, NEPCon Programme Manager for the relevant certification standard, for example the Controlled Wood Programme Manager or the SBP Programme Manager; and a relevant high-level expert in the field of the commodity under assessment identified by the Task Manager and approved by the NEPCon members of the Technical Committee.

## D. List of Documents and Templates

The following documents are referred to within this procedure and support the development of Risk Assessments in Accordance with this procedure.

- Template Proposal to Develop a New Risk Assessment.
- Template Country/Region Expert Job Posting;
- Interview Questions for Country/Region Expert Meeting.
- Template Country/Region Expert Candidate Recommendation.
- Template Country/Region Expert Contract
- Risk Assessment Development Checklist
- Template Record keeping for stakeholder consultation.

Template Stakeholder consultation email (feedback requested)

Invitation for stakeholder consultation meeting

Invitation for expert consultation meeting

Template for Stakeholder Consultation Report

Template Technical Committee Terms of Reference

## E. Risk Assessment Development

### 1. Scoping

- 1.1. Where a need or want for a new Risk Assessment is identified, either through an internal or external process, a proposal to develop the RA shall be submitted to the NEPCon Technical Committee and NEPCon Executive Director for approval by the NEPCon Proponent (for example the NEPCon staff member who has received the request from a client or the relevant Project Manager). The proposal shall include the following elements:
- Objective;
  - Scope of the RA, including geographical area and source types;
  - Timetable of the RA process, including start date and tentative date of submission of the final draft to the NEPCon Technical Committee;
  - Estimated budget and description of how funds have been or shall be secured;

The proposal to develop an RA shall be submitted in the **Template Proposal to Develop a New Risk Assessment**.

- 1.2. Within two (2) weeks of receiving the proposal the NEPCon Technical Committee will:
- Confirm that the proposal has been approved; or
  - Reject the proposal, communicating the reasons for rejection.
- 1.3. NEPCon will publish information about new RA processes upon approval of new proposals on the [NEPCon Sourcing Hub](#).
- 1.4. Geographical Scope
- 1.4.1. To determine the geographical scope, i.e. the areal extent of the region under assessment, or the 'geographic scope' of the assessment, NEPCon proponent, in discussions with the NEPCon Technical Committee, shall consider the homogeneity of the region under assessment. A single 'region' should share the same characteristics for:
- legislation covering land ownership, use and harvesting rights;
  - legislation covering biodiversity, water, air and soil protection;
  - legislation covering basic labour rights and health and safety of workers;
  - legislation covering waste handling and disease control; and
  - legislation covering tree felling licensing and replanting/regeneration.
- 1.4.2. The NEPCon Proponent may also consider relevant aspects of functional and/or geographical scale, which may include the following:
- Geographical scale – determination based on broad geographical boundaries, e.g., administrative sub-divisions (states, counties, provinces,

etc.) and/or biological and/or geographical sub-divisions (bio-regions, eco-regions, water catchments, watersheds, etc.).

- b) Functional scale – determination based on non-geographical characteristics, e.g., type of forested area (e.g., plantations, managed forests and natural forests), tenure or ownership (e.g., public, private, corporate, indigenous, and community forests), scope of management (e.g., the same hunting regime, presence/absence of particular planning requirements, type and/or quality of forest inventory, etc.), and scale, intensity and risk of forest management operations.

1.4.3. Boundaries of the geographical scope shall be clearly described or presented on maps.

1.4.4. If the risk assessment indicates that substantially different levels of risk exist across a given region (i.e. there is a non-homogeneous distribution of risk), then it may be necessary to revisit the original boundaries that were proposed for the region, and, where appropriate, reformulate the area as two or more separate regions in the assessment.

1.5. All RAs will be prepared in accordance with the relevant standard and procedures for the commodity, for example an SBP Regional Risk Assessment will be prepared using the SBP Feedstock Compliance Standard (SBP Standard 1) and the SBP Regional Risk Assessment Procedure.

## 2. NEPCon Task Manager

2.1. Task Manager (TM) identification

2.1.1. Once the Technical Committee has approved a proposal for the development of an RA, a TM shall be identified. The TM is responsible for facilitating and managing the RA process, including managing the assessment process, preparing draft and final RA reports, and conducting stakeholder consultations, according to the requirements of this procedure.

2.1.2. The TM shall have the necessary experience and competences (including language skills required for the geographical scope of the assessment, where it is deemed necessary by the TC).

2.2. One or more external stakeholder shall be engaged to join the NEPCon Technical Committee to review the risk assessment prior to final approval in accordance with the a Terms of Reference prepared by the TM using the Template Technical Committee Terms of Reference, and signed by all members of the TC. The external stakeholder/s does not need to be engaged until after the TM has been identified, i.e. they do not have to be in place for the review and approval of the RA Proposal.

2.3. The TM shall create and maintain a Salesforce engagement dedicated to the RA. The engagement shall be kept up to date at all times, with at a minimum, the following information:

- a) The start and end date of the RA
- b) The planned LOE for internal NEPCon staff working on the RA
- c) The planned external expenses for the RA, including the planned expenses for the Country/Region Expert, in accordance with the budget prepared in 1.1.
- d) The Terms of Reference for the Technical Committee
- e) Details of the recruitment process of the Country/Region Expert (CE), including resumes, interview summaries and the recommendation made to the Technical Committee with their written approval.

- f) Any contracts related to the RA, including contacts with external donors and the Country/Region Expert
- g) All relevant correspondence (i.e. emails and call logs) relating to the RA, particularly those with the Country/Region Expert, and the external Donor, where applicable.
- h) The Stakeholder Map prepared by the TM, and all contact details of identified stakeholders.
- i) All working drafts of the RA, clearly labelled as draft.

### 3. Country/Region Expert (CE)

- 3.1. The development of each RA shall involve the engagement of a Country/Region Expert (CE) to assist with the development of the RA.
- 3.2. The TM shall identify a shortlist (minimum 3) of potential CE candidates. They can be identified via:
  - a) An open recruitment process via the NEPCon recruitment channels using the **Template Country/Region Expert Job Posting**;
  - b) Recommendations from within the NEPCon network, i.e. where NEPCon has a network in the country existing contacts can be used to identify appropriate candidates.
- 3.3. The CE shall have, at a minimum, the following credentials:
  - c) A bachelor's degree in a relevant field;
  - d) Five years' experience in the field relevant to the RA;
  - e) Documented research and analysis skills;
  - f) A detailed understanding of the country/regional context and system, including an understanding of the legal system governing the commodity in question.
- 3.4. The Country/Region Expert shall be engaged to assist with the following tasks, among others:
  - j) Researching and preparing drafts of the RA using the guidance and templates provided by NEPCon.
  - k) Identifying key in-country experts for in-country expert discussions and reviews
  - l) Responding to feedback from the NEPCon TM and revising the draft risk assessment accordingly.
  - m) Arranging expert interviews.
  - n) Participating in expert interviews.
  - o) Identifying stakeholders to outreach to for the stakeholder consultation.
  - p) Assisting with reviewing stakeholder feedback and finalising the report.
- 3.5. The TM shall conduct interviews with the shortlisted candidates. The **Interview Questions for Country/Region Expert Meeting** shall be used. A record of the interview will be kept in the salesforce engagement for the RA.
- 3.6. The TM will make a recommendation to the Technical Committee for their preferred candidate for CE. The recommendation shall be in writing, using the **Template Country/Region Expert Candidate Recommendation**.
- 3.7. Within one (1) week of receiving the recommendation, the Technical Committee will:
  - a) Confirm that the candidate for CE has been approved; or
  - b) Reject the candidate, communicating the reasons for rejection.

- 3.8. The TM shall develop a draft contract for the preferred candidate using the **Template Country/Region Expert Contract**. The terms of the contract shall be aligned with the proposal to develop the RA (1.1) and the expenses (2.3) and the activities detailed in 3.2.
- 3.9. The contract shall be recorded in salesforce as a contract entry in the relevant engagement.

#### 4. Risk Assessment preparation

- 4.1. The RA shall be drafted using the relevant template depending on the applicable Standard..
- 4.2. The TM shall develop the risk assessment following these steps, in accordance with the **Risk Assessment Development Checklist as shown in Figure 1.**

##### FIGURE 1

**Step 1:** Kick-off meeting between the TM and CE.

**Step 2:** CE develops draft 1 of the RA in accordance with the relevant standard, and noting particularly clause 5 herein.

**Step 3:** TM reviews draft 1, provides detailed feedback to CE.

**Step 4:** CE revises RA based on feedback and develops draft 2 of RA.

**Step 5:** TM reviews draft 2, provides detailed feedback to CE.

**Step 4:** CE revises RA based on feedback and develops draft 3 of RA.

**Step 5:** CE identifies a list of in-country experts to consult with on the development of the RA in accordance with clause 6 herein.

**Step 6:** The TM and CE shall conduct in-country expert interviews about the draft RA in accordance with clause 6 herein.

**Step 7:** The TM and CE shall revise the RA based on the input gathered from the expert interviews, producing the Consultation Draft RA.

**Step 8:** The TC shall review the Consultation Draft RA, plan for stakeholder consultation and stakeholder map and approve of the consultation process going ahead.

**Step 9:** The TM shall carry out the stakeholder consultation on the RA in accordance with **Annex A** herein (*NOTE: This step only applies for Risk Assessments developed by NEPCon outside existing schemes which conduct their own formal stakeholder consultation process, i.e. the FSC CW CNRAs*).

**Step 10:** The TM shall revise the RA based on the feedback from the stakeholder consultation, with input, as needed from the CE, producing the final draft.

**Step 11:** The RA shall be translated into English (where needed), professionally edited and prepared in the final publishable format. The Country Risk Profile for the NEPCon Sourcing Hub shall be developed.

**Step 12:** The Technical Committee shall review and approve the Risk Assessment and Country Risk Profile.

**Step 13:** The NEPCon Executive Director shall give final sign-off on the approval.

**Step 14:** RA and Country Risk Profile is published on the NEPCon Sourcing Hub

- 4.3. Sufficient information shall be gathered to fully assess the defined indicators in the relevant standard.
- 4.4. The assessment shall be carried out based on a combination of different public sources and consultations with experts/stakeholders during the RA development process. Direct and

indirect sources of information should be combined when relevant and possible (e.g., health and safety may be evaluated directly by authorities checking worker safety and indirectly by accident inventories). Where relevant and applicable, NEPCo may develop a list of sources that shall be considered in the development of an RA.

- 4.5. All data used in the risk assessment shall be evaluated for relevance and reliability. The evaluation of information should be based on objective criteria, e.g., publication indexes, data providers, relevance of the information considering the validity date of the risk assessment, dates of publication, methodology used for data gathering, etc. Information sources older than five years should be avoided unless their adequacy can be confirmed.
- 4.6. Whenever possible, information relevant to the specific context of the scope of the RA shall be used, i.e. forestry specific information as opposed to generic country level information.
- 4.7. Stakeholder consultation during RA development constitutes an important source of information. The risk designations shall not be finalized until the stakeholder consultation has been conducted in accordance with **Annex 1**. It is acceptable for the TM to assign provisional risk levels prior to stakeholder consultation for the purposes of facilitating stakeholder input in the process.
- 4.8. Data sources shall be fully referenced in all draft and final reports so that they are verifiable by external parties. The Harvard Referencing style shall be used.

## 5. Designation of risk

- 5.1. Risk designation shall be conducted separately for each indicator. Should there be substantial doubt as to the risks associated with different categories of feedstock (e.g. types of controlled wood, FSC certified or PEFC certified material, primary secondary or tertiary feedstocks), the TM in discussions with the CE should evaluate further based on the context and any guidance provided in the relevant standard.
- 5.2. For each indicator, the region under assessment shall be determined to be:
  - a) **'Low risk'**, when evidence indicates that the low risk threshold(s) are met, and there is no other information that would lead to a 'specified risk' designation; OR
  - b) **'Specified risk'** when available means of verification do not show evidence that the low risk category is met; or that one of more specific risk area was identified.
- 5.3. The TM and CE may identify new or additional risk factors in a region (e.g. due to national conditions) which have not been specifically identified in the relevant standard.
- 5.4. The TM and CE shall apply a precautionary approach and assign a 'specified risk' designation where there is a high level of perceived corruption in the country/region in question (a CPI value of less than 50/100), and no evidence can be obtained to indicate that the risk is low.
- 5.5. For each indicator, the rationale for risk designation shall be provided in relation to the threshold, means of verification, and evidence/information used. Additionally, for 'specified risks', the type of risk(s) shall be described in detail.
- 5.6. Risk designations shall consider the scale, intensity and management arrangements within the area under assessment.
- 5.7. When assessing risk with regards to scale, intensity and management arrangements within a given area, the overall impact of these operations on the elements elaborated in the indicators shall be considered.
- 5.8. Where 'specified risks' are identified, the TM and CE shall propose a set of mitigation measures which, if implemented, should act to reduce those specified risks.

## 6. Expert interviews

- 6.1. The CE shall, as part of the preparation of the risk assessment (clause 4 herein) identify in-country experts to consult with on the development of the RA. This consultation is separate to the formal stakeholder consultation carried out in accordance with Annex X, and forms an integral part of the development process for the RA.
- 6.2. The in-country experts must cover all the relevant aspects of the RA and may include academics/researchers or representatives from relevant government agencies. It is expected that no less than five (5) in-country experts shall be interviewed during the development of the RA.
- 6.3. The in-country experts interviewed during the development of an RA shall include at minimum one expert from the following areas:
  - economic interests* (i.e. private companies within the industry of the commodity in question; contractors within the industry; representatives of workers and industries such as unions or industry associations; and certificate holders);
  - social interests* (i.e. NGOs; workers; international, national and local trade/labor unions; representatives of local communities; representatives of indigenous peoples and/or traditional peoples (if present and/or holding rights); and representatives of recreation interests); and
  - environmental interests* (i.e. NGOs involved or with an interest in the environmental issues; and local communities and indigenous peoples' representatives);
- 6.4. The TM shall determine the most appropriate mechanisms for engaging with experts, in consultation with the Technical Committee and the CE.
- 6.5. The TM and CE shall conduct in-country expert interviews about the draft RA. The interviews may be conducted either face-to-face, on the phone or via skype. Email interviews (i.e. the sending of emails and asking questions) is not the preferred method for seeking expert input, and shall only be used as a last resort and with the approval of the Technical Committee.

## 7. Stakeholder consultation

- 7.1. Stakeholder consultation shall be conducted in accordance with Annex 1
- 7.2. Comprehensive records of the stakeholder consultation shall be maintained on the relevant Salesforce Engagement.
- 7.3. The Stakeholder Consultation Report shall be prepared by the TM using the **Template Stakeholder Consultation Reportm**, and presented to the Technical committee as part of the Risk Assessment Approval Package.
- 7.4. The requirements of Annex 1 only apply to Risk Assessments developed by NEPCon outside existing schemes which conduct their own formal stakeholder consultation process, i.e. the FSC CW CNRAs).

## 8. Final approval by the Technical Committee

- 8.1. The TM shall submit the Final RA Report to the Technical Committee as part of as Risk Assessment Approval Package. The Risk Assessment Approval Package shall include:
  - a) Final Risk Assessment;
  - b) NEPCon Sourcing Hub Country Risk Profile content;
  - c) Stakeholder Consultation Report; and
  - d) Completed Risk Assessment Development Checklist
- 8.2. Within ten (10) days of receiving the Risk Assessment Approval Package, the Technical Committee shall review the package. In the first instance, the TC shall review the report to confirm its adequacy using the following criteria:

- a) the structure and content of the report conforms to requirements as set forth in this procedure; and
  - b) sufficient information is presented to conclude that the risk assessment was conducted in accordance with procedures.
- 8.3. If the Technical Committee finds the report to be inadequate according to criteria in 8.2, it will be returned directly to the TM for resolution without any further consideration.
- 8.4. For any reports which are returned to the TM, the Technical Committee shall prepare a short description of the report's shortcomings. The Technical Committee may also make recommendations for improvement.
- 8.5.
- 8.6. Following review, the Technical Committee shall make a specific recommendation to the NEPCon Executive Director as to whether to approve or reject the Final RA Report.

## 9. Decision by NEPCon Executive Director

- 9.1. The NEPCon Executive Director (or designee) will review the recommendation from the Technical Committee and take a decision as to whether:
- a) NEPCon endorses the Final RA Report; or
  - b) NEPCon rejects the Final RA Report.
- 9.2. NEPCon's decision will be final.
- 9.3. In cases where the report is rejected, the Executive Director shall provide the Technical Committee and TM with a rationale for rejection and may make suggestions for improvements or revisions.
- 9.4. In cases where the report is approved, NEPCon will publicly announce the RA and publish it on the NEPCon Sourcing Hub.
- 9.5. Endorsed RAs remain valid for a period of five (5) years from the approval date by NEPCon, although they may be superseded if a new RA is completed within the 5 year period.

## F. Maintenance and Revision of a Risk Assessment

### 10. Evaluation of information

- 10.1. NEPCon shall collect information related to the RA (e.g., enquiries, comments and/or proposals for RA revision, etc.) during its period of validity.
- 10.2. The information received shall be evaluated by the TM as it is collected to establish the need for:
- a) Updating the NRA when there is no change in risk determination and/or risk mitigation means, or
  - b) Revising the NRA when a change in risk determination and/or risk mitigation means (Control Measures) are required or likely.

### 11. Review and revision of a Risk Assessment

- 11.1. Updates of the RA shall be implemented according to needs and at least every 5 years. In case of an update, the RA shall be given a new, 2<sup>nd</sup> level version number (e.g., V1-1, V1-2). Update(s) may include but are not limited to:
- a) update of links of information sources; or

- b) adding information sources and maps and amending typographic or translation mistakes.
- 11.2. Where NEPCon receives feedback/input into an Approved Risk Assessment, confirmation of the receipt of the feedback shall be provided by the TM within seven (7) days.
- 11.3. In cases when there is **clear** and **undisputable evidence** requiring a change of risk determination and/or change of mandatory risk mitigation means, NEPCon shall amend the RA accordingly. Examples of clear and undisputable evidence may include but are not limited to:
- a) changes in legislation,
  - b) results of complaints handled at the international level; and
  - c) newly published scientific evidence.
- 11.4. An RA amended under urgent revision shall be sent re-approved in accordance with clauses 8 and 9 herein.
- 11.5. Any amendments to the RA shall be reflected, where relevant, in the Country Risk Profile on the NEPCon Sourcing Hub.

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# Annex 1: Stakeholder Consultation

## 1. General

- 1.1. NEPCon shall carry out comprehensive stakeholder consultation on all Risk Assessments, unless public stakeholder consultation forms part of an external standard procedure, for example the development of FSC Controlled Wood Centralized National Risk Assessments.
- 1.2. NEPCon shall publicly consult on the RA to ensure the RA's relevance to national/regional conditions and to allow stakeholders to contribute to the RA process.
- 1.3. The TM shall identify stakeholders according to clause 2 of this annex, and shall invite them to comment on the Public Draft RA Report. The TM shall ensure that stakeholders from all stakeholder groups listed in clause 2 are invited to participate.
- 1.4. NEPCon shall ensure that participation in the consultation process:
  - a) is open to all stakeholders; and
  - b) aims to achieve a balance of interests in the subject matter and in the geographic scope to which the standard applies.
- 1.5. The TM shall maintain a list of identified stakeholders and their respective contact details.
- 1.6. Accurate records of all stakeholder consultation shall be kept, including the contact details of the stakeholders.
- 1.7. The period during which stakeholders can submit comments on the first draft of the RA is required to be at least sixty (60) days.

## 2. Identifying stakeholders

- 2.1. Stakeholders representing the interests listed below shall be identified and notified during the process of RA development by the TM and CE. Each group specified may be represented by an unlimited number of representatives, provided balanced input into RA process is maintained. The list is not comprehensive and any other Stakeholder groups relevant for the RA process under national/regional conditions shall be identified and notified:
  - a) Economic interests – including owners and/or managers of large, medium and small companies in the relevant commodity industry; contractors operating in the commodity industry; representatives of workers and industries; Certificate holders;
  - b) Social interests - NGOs involved or with an interest in social aspects of the commodity industry and other related operations; workers employed in the commodity industry; international, national and local trade/labor unions; representatives of local communities involved or with an interest in the commodity industry; representatives of indigenous peoples and/or traditional peoples (if present and/or holding rights; representatives of recreation interests.
  - c) environmental interests - including NGOs involved or with an interest in the environmental aspects of the commodity industry. Consultation should target the following areas of interest and expertise: biological diversity; water and soil; environmental-related High Conservation Values; local communities and indigenous peoples' representatives
  - d) Certification bodies which are actively involved in certification of the commodity within the country
  - e) National and state government agencies with responsibility for governance of the commodity
  - f) Experts with expertise in the commodity;

- g) Research institutions and universities
  - h) Representatives of relevant certification schemes (e.g. FSC, SBP, SAN, PEFC) from offices in the region
- 2.2. The TM and CE shall map stakeholders in the country/region using the **Template Stakeholder Map [COUNTRY]**.

### 3. Preparing for stakeholder consultation

- 3.1. The TM shall prepare a Stakeholder Consultation Package to be sent to stakeholders, the Stakeholder Consultation Package shall include the following:
- a) A cover letter prepared using the **Template Stakeholder Consultation Cover letter** that includes:
    - a. A brief description of NEPCon and this Procedure;
    - b. A brief description of the purpose of the RA, the scope of the risk assessment and the objective of stakeholder consultation, including a request for comments;
    - c. The start and end dates of the stakeholder consultation period;
    - d. An estimated timeline for the completion of the proposed RA;
    - e. A statement that comments will be published unless confidentiality is requested;
    - f. A statement that the RA development process is aligned with this procedure; and
    - g. Contact details of the Coordinator;
  - b) The Consultation Draft Risk Assessment;
  - c) A Stakeholder Feedback Form using the **Template Stakeholder Feedback Form**.

### 4. Conducting stakeholder consultation

- 4.1. Public consultation on the Consultation Draft RA shall be conducted for a minimum of 60 days for comment submissions by stakeholders. "Public" availability should be determined based on national/regional conditions.
- 4.2. For new risk assessments, a second round of consultation of at least 30 days shall be undertaken.
- 4.3. Where substantive, unresolved issues persist after the consultation round(s), or where insufficient feedback was received, NEPCon shall carry out additional rounds of consultation, as necessary. The need for additional consultation periods prior to the development of the Final RA shall be at the discretion of NEPCon, taking into account the comments received during the public consultation.
- 4.4. Public consultation shall include, at a minimum:
- a) Publication of the draft RA on a dedicated Risk Assessment Consultation page on the NEPCon Sourcing Hub, with clear instructions for stakeholders on how feedback on the risk assessment can be provided;
  - b) Notification of the consultation in the NEPCon Newsletter;
  - c) Notification of the consultation to all subscribers to updates on the NEPCon Sourcing Hub; and
  - d) Notification, via email, to the List of Stakeholders developed by the TM and CE in the course of the development of the Risk Assessment.

- 4.5. The TM shall inform the Technical Committee about the start date of the consultation at least three (3) weeks in advance.
- 4.6. The TM shall be proactive in seeking input from representatives of identified stakeholders, including using a variety of means to inform stakeholders, appropriate to the stakeholders being contacted.
  - a) Consultation techniques may include:
  - b) face to face meetings,
  - c) personal contact by phone or letter,
  - d) notices published in the national and/or local press and on relevant websites,
  - e) local radio announcements,
  - f) announcements on local customary notice boards in the language of the local people, and emails in the language of the recipients.
- 4.7. The TM should consider holding stakeholder workshops to provide a forum for direct input and discussion. The TM is responsible for facilitating culturally appropriate outreach to representatives of all identified Stakeholders.
- 4.8. The Coordinator shall acknowledge receipt of comments and their proper collection.

## 5. Amending the risk assessment based on the stakeholder consultation

- 5.1. The TM shall review all comments by stakeholders and address them in the Final RA Report.
- 5.2. A complete and accurate record of the review and consideration of all stakeholder feedback shall be kept, that clearly indicates how feedback was incorporated or provided a response/justification for not including them in the final version.
- 5.3. For stakeholder feedback to result in amendment to the RA that changes a risk determination and/or changes a risk mitigation means, clear and undisputable evidence must be provided. Examples of clear and undisputable evidence may include but are not limited to:
  - a) changes in legislation,
  - b) results of complaints handled at the international level; and
  - c) newly published scientific evidence.
- 5.4. The TM shall identify stakeholder groups that are not adequately represented by the feedback received; and proactively seeks their contributions. This includes addressing constraints faced by disadvantaged stakeholders.
- 5.5. The TM shall respond to all stakeholders who participate in the consultation process and indicate how their comments were taken into account, at latest by the release of the RA for a subsequent consultation period or prior to its submission to for endorsement.

## 6. Stakeholder consultation report

- 6.1. The TM shall prepare a stakeholder consultation report using the **Template Stakeholder Consultation Report** which includes:
  - d) A summary of the issues raised and how they were addressed;
  - e) An analysis of the range of stakeholder groups who submitted comments;
  - f) An unedited copy of all comments as an Annex to the report.
- 6.2. Stakeholder consultation reports shall be prepared in English however copies of stakeholder comments are not required to be translated from their original language.

- 6.3. Stakeholder consultation reports shall be published, in their entirety on the NEPCon Sourcing Hub, unless specific stakeholders have requested confidentiality in which case their comments shall be treated as confidential material.

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NEPCon (Nature Economy and People Connected) is an international, non-profit organisation that builds commitment and capacity for mainstreaming sustainability. Together with our partners, we foster solutions for safeguarding our natural resources and protecting our climate.

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