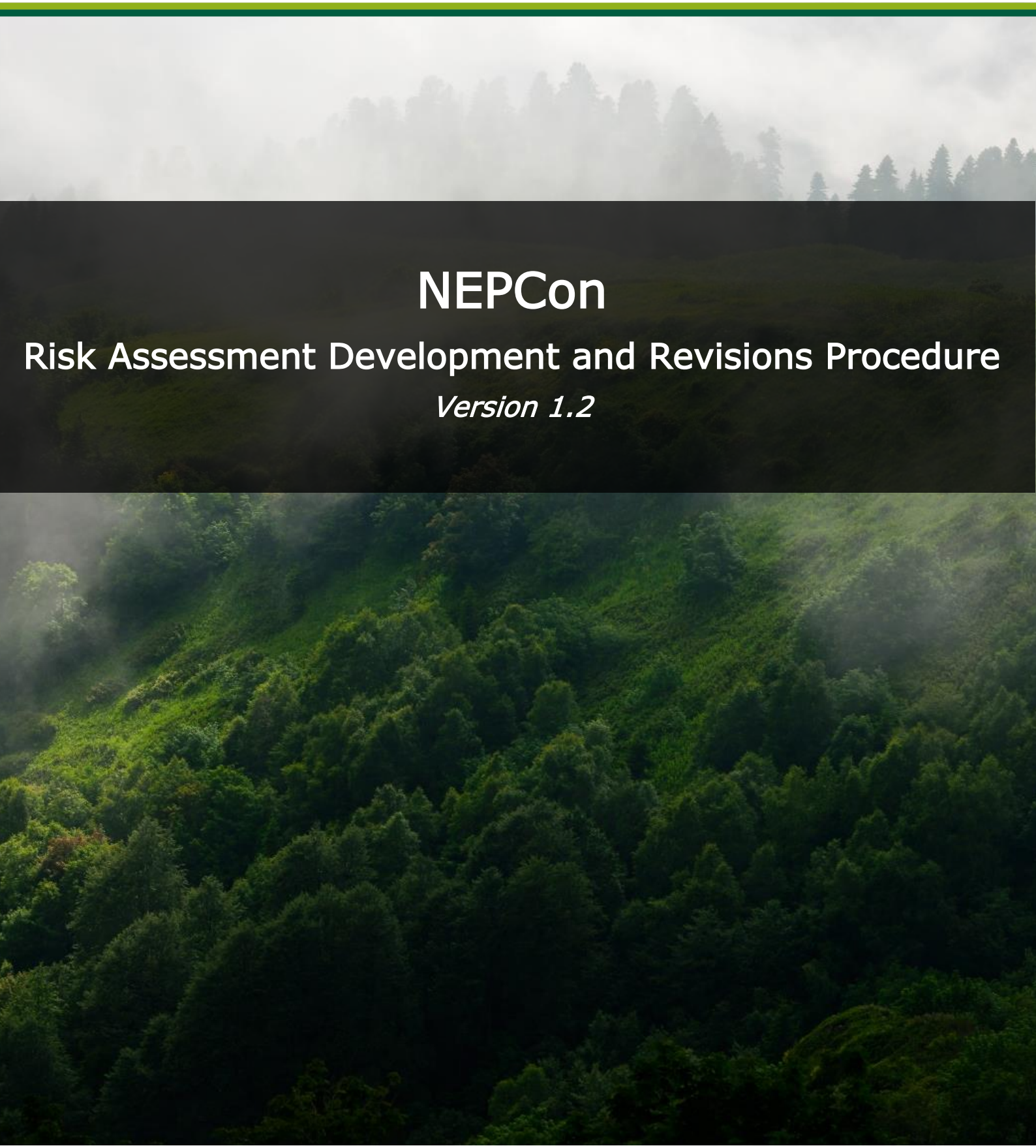


NEPCon

Risk Assessment Development and Revisions Procedure

Version 1.2

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A. Objective

The objective of this procedure is to provide a clear, transparent, and unambiguous process 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 – A Risk Assessment that has been approved by the Technical Committee in accordance with these procedures.

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

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

Country/Region Expert (CE) – A consultant or NEPCon staff member engaged to assist with the development of a RA. The CE shall be an experienced professional with a detailed understanding of the country/regional context and system, including an understanding of the legal system governing the commodity in question.

Final Draft Risk Assessment (Final Draft RA) – The version of a Risk Assessment prepared by the TM after consultation for the approval of the Technical Committee.

In-Country Experts – Country/region level experts with knowledge and experience in relevant aspects of the RA. May include academics/researchers or representatives of relevant government agencies. The In-Country Experts may be physically based outside of the country in question. In-country experts are interviewed during the development of an RA to ensure the reliability of the information contained there-in.

Intensity - A measure of the force, severity or strength with which a potential risk of legal non-compliance affects society, the production of forest products and other services, the forest ecosystem and the people directly and indirectly affected by forest operations.

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

Proposal to Develop a New Risk Assessment – A proposal for a new risk assessment process to be commenced. (see section D).

Risk Assessment (RA) - A report analysing and designating the risk of sourcing from 'unacceptable' sources in a country or region, developed according to a given 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 (see section 5).

Scale - A measure of the extent to a potential risk of legal non-compliance affects society, the production of forest products and other services, the forest ecosystem and the people directly and indirectly affected by forest operations.

Specified risk – The risk designation given, when available means of verification do not show evidence that the low risk category is met; or that one of more specific risk areas were 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 – A map of the relevant stakeholders in the country/region to be targeted during the stakeholder consultation.

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 (TC) – A permanent, internal decision-making committee established to oversee and approve Timber Legality Risk Assessment development processes internally in NEPCon. The Technical Committee consists of 4-7 people, which shall include the NEPCon Responsible Sourcing Programme Manager, the NEPCon Sourcing Hub Programme Manager and a representative from NEPCon Solutions. The committee may also include NEPCon Programme Managers for relevant certification standards, for example the Controlled Wood Programme Manager or the SBP Programme Manager; and other relevant NEPCon staff or relevant external experts.

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

Interview Questions for Country/Region Expert Meeting

Template Country/Region Expert Contract

Invitation for stakeholder consultation meeting

Template for Stakeholder Consultation Report

Practical guide for upload of public consultation on the SH

Timber Legality Risk Assessment Overview

Timber Legality Risk Assessment Template

E. Development of Risk Assessments

1. Scoping

1.1. Where a need for a new Risk Assessment (RA) is identified, either through an internal or external process, a proposal to develop the RA shall be submitted to the NEPCon Technical Committee for approval. The proposal shall include the following elements:

a) Objective;

b) Scope of the RA, including geographical area (full country or only specific regions) and source types;

c) Timetable of the RA process, including start date and tentative date of submission of the final draft to the NEPCon Technical Committee;

d) 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** (see section D).

1.2. Within two (2) weeks of receiving the proposal the NEPCon Technical Committee shall:

a) Confirm that the proposal has been approved; or

b) 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. 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 Technical Committee

2.1. It is the responsibility of the NEPCon Technical Committee to review and approve all Risk Assessments.

2.2. Internal or external experts may join the Technical Committee for a specific RA development process based on their specific expertise on the country, commodity or certification standard under which the RA is developed.

3. NEPCon Task Manager

3.1. Once the Technical Committee has approved a proposal for the development of an RA, a Task Manager (TM) shall be identified. The TM is responsible for facilitating and managing the RA process, including managing the assessment process, preparing drafts and the final RA report, and conducting stakeholder consultations, according to the requirements of this procedure.

3.2. 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).

3.3. The TM shall ask the Sourcing Hub manager to create 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 development process.

b) The planned LOE for internal NEPCon staff participating in the RA development process.

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 and ToR related to the RA, including contracts 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.

4. Country/Region Expert (CE)

4.1. The development of each RA shall involve the engagement of a Country/Region Expert (CE) to assist with the development procedure.

4.2. The TM shall identify a shortlist (minimum 3) of potential CE candidates. The candidates can be identified via:

a) An open recruitment process via the NEPCon recruitment channels.

b) Recommendations from within the NEPCon network, i.e. where NEPCon has a network in the country and existing contacts can be used to identify appropriate candidates.

4.3. The CE shall have, at a minimum, the following credentials:

a) A bachelor's degree in a relevant field;

b) Five years' experience in the field relevant to the RA;

c) Documented research and analysis skills;

d) A detailed understanding of the country/regional context and system, including an understanding of the legal system governing the commodity in question.

4.4. The Country/Region Expert shall be engaged to assist with the following tasks, among others:

a) Researching and preparing drafts of the RA using the guidance and templates provided by NEPCon.

b) Identifying key in-country experts for in-country expert discussions and reviews.

c) Responding to feedback from the NEPCon TM and revising the draft risk assessment accordingly.

d) Arranging expert interviews.

e) Participating in expert interviews.

f) Identifying stakeholders to be invited to participate in the stakeholder consultation.

g) Assisting with reviewing stakeholder feedback and finalising the report.

4.5. The TM shall conduct interviews with the shortlisted candidates, using the **Interview Questions for Country/Region Expert Meeting**. A record of the interviews shall be kept in the salesforce engagement for the RA.

4.6. The TM shall submit a recommendation in writing for the selection of a CE to the Sourcing Hub Manager for approval.

4.7. In case it has not been possible to identify a minimum of 3 candidates for the CE position, a justification of the factors preventing this shall be included in the recommendation for the selection of a CE.

4.8. If the candidate is approved by the Sourcing Hub Manager, the TM develops a draft contract for the selected 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) as well as the expenses and the activities detailed in the proposal.

4.9. The contract shall be signed by the Sourcing Hub Manager and recorded in salesforce as a contract entry in the relevant engagement.

5. Risk Assessment preparation

5.1. The RA shall be drafted using the relevant template depending on the applicable commodity and relevant Standard or Framework developed.

5.2. The TM shall develop the risk assessment following the steps detailed in the **Risk Assessment Development Checklist**, shown below.

Risk Assessment Development Checklist

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

Step 2: CE prepares draft 1 of the RA in accordance with this procedure and the relevant standard/framework.

Step 3: In parallel with the development of Step 2, the CE identifies a list of in-country experts to consult on the development of the RA in accordance with section 8 of this procedure.

Step 4: TM reviews the draft RA and provides detailed feedback to CE who incorporates the feedback. One or more iterations of steps 2, 3 and 4 may take place, before a satisfactory draft is ready prior to moving to step 4.

Step 5: CE and the TM conducts in-country expert interviews about the draft RA in accordance with section 8 of this procedure. In some instances, the CE can conduct these interviews.

Step 6: The TM and CE shall revise the RA based on the input gathered from the expert interviews, producing a Consultation Draft RA.

Step 7: TM and CE identify a list of stakeholders in accordance with section 9 of this procedure and prepare a plan for stakeholder consultation, a stakeholder map and ensures translations (to English or local language) of consultation documents if necessary.

Step 8: The Sourcing Hub manager reviews the Consultation Draft RA, plan for stakeholder consultation and stakeholder map and approves the planned consultation process.

Step 9: The TM carries 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 that conduct their own formal stakeholder consultation process, i.e. the FSC CW CNRAs).*

Step 10: The TM revises the draft RA based on the feedback from the stakeholder consultation, with input, as needed from the CE, producing the final draft. Country Risk Profile for the NEPCon Sourcing Hub is be developed by the TM.

Step 11: The final RA is translated into English (where needed).

Step 12: The TC reviews and approves the final draft Risk Assessment and Country Risk Profile, in accordance with section 10 herein.

Step 13: The approved RA is professionally edited and prepared in the final publishable format and the

Step 14: The RA and Country Risk Profile is published on the NEPCon Sourcing Hub by the Sourcing Hub Manager.

5.3. Sufficient information shall be gathered to fully assess each indicator of the relevant standard/framework and justify the risk designation reached.

5.4. The assessment is usually primarily a desk-based exercise in that it is developed based on a combination of public sources of information and consultations with experts and stakeholders during the RA development process. However, in other situations direct and indirect sources of information obtained on-site may be included. In these cases, the different types 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).

5.5. 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.

5.6. 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.

5.7. 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** of this procedure. 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.

5.8. 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.

6. Geographical Scope

6.1. To determine the geographical scope, i.e. the areal extent of the region under assessment, the TM in discussions with the CE and the TC, shall consider the homogeneity of the region under assessment. A single 'region' should share the same legal requirements in the sectors that are relevant for the RA.

6.2. In the determination of the geographical scope, relevant aspects of functional and/or geographical scale may also be considered, which may include the following:

a) 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 (bioregions, 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.) as well as scale, intensity and risk of forest management operations.

6.3. Boundaries of the geographical scope shall be clearly described or presented on a map. 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), it may be necessary to revisit the original boundaries that were proposed for the region, and, where appropriate, divide the area into two or more separate regions in the assessment.

7. Designation of risk

7.1. Risk designation shall be conducted separately for each indicator. Should there be substantial doubt as to the risks associated with different categories of material, the TM in discussions with the CE should evaluate further based on the context and any guidance provided in the relevant standard.

7.2. 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 areas were identified.

7.3. 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.

7.4. 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 or little evidence can be obtained to indicate that the risk is low. This approach is particularly important in the absence of information in the public domain which can inform the risk conclusion.

7.5. For each indicator, the rationale for risk designation shall be provided in relation to the threshold, means of verification, and evidence/information used. Additionally, where possible, for 'specified' risks', the type of risk(s) shall be described in detail.

7.6. Risk designations shall consider the scale, intensity and management arrangements within the area under assessment.

7.7. 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.

7.8. 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.

8. Expert interviews

8.1. The CE shall, as part of the preparation of the risk assessment identify in-country experts to consult with on the development of the RA. This consultation is separate to the formal stakeholder consultation and forms an integral part of the development process for the RA.

8.2. Where possible, the in-country experts should cover all the relevant aspects of the RA and may include academics/researchers or representatives from relevant government agencies or NGOs. However, expert interviews may be concentrated where information in the public domain is limited or where more detailed information is needed to reach a risk conclusion.

8.3. It is expected that no less than five (5) in-country experts shall be interviewed during the development of the RA.

8.4. The TM shall determine the most appropriate mechanisms for engaging with experts, in consultation with the Technical Committee and the CE.

8.5. The TM and CE shall conduct in-country expert interviews during the drafting of the RA. The interviews may be conducted either face-to-face, by phone or via skype. Email interviews (i.e. the sending of emails and asking questions) may be used as a complementary effort to receive clarifications.

8.6. Comprehensive records of the in-country expert interviews shall be maintained on the relevant Salesforce Engagement.

9. Stakeholder consultation

9.1. Stakeholder consultation shall be conducted in accordance with Annex 1 of this procedure.

9.2. Comprehensive records of the stakeholder consultation shall be maintained on the relevant Salesforce Engagement.

9.3. The Stakeholder Consultation Report shall be prepared by the TM using the **Template Stakeholder Consultation Report** and presented to the Technical committee as part of the Risk Assessment Approval Package.

9.4. The requirements of Annex 1 only apply to Risk Assessments developed by NEPCon outside existing schemes that conduct their own formal stakeholder consultation process, i.e. the FSC Controlled Wood CNRAs.

10. Final approval by the Technical Committee

10.1. The TM shall submit the Final RA Report to the Technical Committee as part of the Risk Assessment Approval Package, which shall also include:

a) Final Risk Assessment;

b) NEPCon Sourcing Hub Country Risk Profile content; and

c) Stakeholder Consultation Report.

10.2. 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 the procedures.

10.3. If the Technical Committee finds the report to be inadequate it shall be returned to the TM for resolution.

10.4. For any reports that are returned to the TM, the Technical Committee shall prepare a short description of the report's shortcomings and may make recommendations for improvement.

10.5. Following review, the Technical Committee shall make a decision to either approve or reject the Final RA Report.

10.6. In case the report is rejected, the Technical Committee shall provide the TM with a rationale for the rejection and may make suggestions for improvements or revisions.

10.7. In case the report is approved, NEPCon will publicly announce the RA and publish it on the NEPCon Sourcing Hub.

10.8. 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

11. Evaluation of information

11.1. NEPCon shall collect information related to the RA (e.g., enquiries, comments and/or proposals for RA revision, etc.) during its period of validity.

11.2. The information received shall be evaluated by the Sourcing Hub Manager as it is collected to establish the need for:

a) Updating the RA when there is no change in risk determination and/or risk mitigation measures, or

b) Revising the RA when a change in risk determination and/or risk mitigation measures (Control Measures) are likely to be required.

12. Review and revision of a Risk Assessment

12.1. Major revisions of a RA shall be made according to necessity and at least every 5 years. In such cases, the RA shall be given a new version number (e.g. V2-0, 3-0)

12.2. In case of an update between major revisions, the RA shall be given a new, 2nd 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.

c) Urgent revisions as described in 12.5 below.

12.3. Where NEPCon receives feedback/input regarding an Approved Risk Assessment, confirmation of the receipt of the feedback shall be provided by the Sourcing Hub Manager within seven (7) days.

12.4. In cases when there is **clear** and **undisputable evidence** requiring a change of risk determination and/or change of mandatory risk mitigation measures, 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 or other information in the public domain which has the potential to alter risk designations.

12.5. A RA amended under urgent revision shall be re-approved as described below:

a) **Small updates without changing risk conclusion**. The update can include minor updates on several indicators.
   - The RA shall be approved by the Sourcing Hub Manager.
   - The RA does not need approval by the technical committee
   - Changes and the date of the revision shall be recorded in the internal NEPCon document Timber Legality Risk Assessment Overview
   - Public stakeholder consultation is not required

b) **Partial update** (outside full regular revision) for specific indicators leading to a change of risk conclusion or if changes are substantial (a number of indictors are re-evaluated, and there has been a complete re-writing of findings)
   - Approval by the technical committee as specified in section 10 of this procedure is required.
   - Stakeholder consultation as described in section 9 of this procedure, is required if:

- Update leads to change of risk conclusion.
- Substantial legal requirements have been changed during the update.

12.6. Any amendments to the RA shall be reflected, where relevant, in the Country Page on the NEPCon Sourcing Hub.

Annex 1: Stakeholder Consultation

1. General

1.1. NEPCon shall carry out comprehensive stakeholder consultation on all new or major revisions of 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 be heard and contribute to the RA process.

1.3. The TM shall identify stakeholders according to section 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 section 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 the RA development process is maintained. The list is not comprehensive, and any other relevant stakeholder group 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 in 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 in or with an interest in the commodity industry; representatives of indigenous peoples and/or traditional peoples; representatives of recreation interests.

c) **Environmental interests** - including NGOs involved in 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** that 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.

3. Preparing for stakeholder consultation

3.1. The TM shall prepare a Stakeholder Consultation Package which shall be sent to the stakeholders, the Stakeholder Consultation Package shall include the following:

a) A cover letter prepared using the template **Invitation for stakeholder consultation meeting** which 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.

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. Where substantive, unresolved issues persist after the consultation 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 decided at the discretion of NEPCon, taking into account the comments received during the public consultation.

4.3. 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.

4.4. The TM shall inform the Technical Committee about the start date of the consultation at least three (3) weeks in advance.

4.5. 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. Consultation techniques may include:

a) face to face meetings,

b) personal contact by phone or letter,

c) notices published in the national and/or local press and on relevant websites,

d) local radio announcements,

e) announcements on local customary notice boards in the language of the local people, and emails in the language of the recipients.

4.6. 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.

4.7. The Coordinator shall acknowledge receipt of comments and their proper collection.

5. Amending the risk assessment based on the stakeholder consultation

5.1. NEPCon 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 provides a response/justification for not including it 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 measures, clear and undisputable evidence must be provided. Examples of clear and undisputable evidence may include but is not limited to:

a) Changes in legislation,

b) Results of complaints handled at the international level; and

c) Newly published scientific evidence or other information in the public domain which has the capacity to alter risk designations.

5.4. The TM shall identify stakeholder groups that are not adequately represented by the feedback received; and proactively seek 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 final approval.

6. Stakeholder consultation report

6.1. The TM shall prepare a stakeholder consultation report using the **Template Stakeholder Consultation Report** which includes:

a) A summary of the issues raised and how they were addressed;
b) An analysis of the range of stakeholder groups who submitted comments;
c) 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.