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RSB Screening Tool

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1 BACKGROUND

1.1 Introduction

The RSB standard requires participating operators (POs) to meet its criteria and minimum requirements in order to be compliant with the standard. The RSB has developed additional tools to assist operators in understanding how best to meet the requirements.

Principle 2 (and its criteria) contained within the RSB standard requires participating operators (POs) to complete the RSB impact assessment process. This process involves many steps, some of which are necessary for all operators and others which are only necessary in particular instances. All operators are required to complete the screening process contained herein. The RSB impact assessment process is described in RSB document RSB-GUI-01-002-01 which contains an impact assessment decision tree for ease of understanding the process. You are advised to start with this document as it outlines the entire process and will guide you through all of the steps required. This document is the screening process which is the first step you need to complete in the RSB impact assessment process. This process is a guide through the RSB impact assessment process, but you may have to complete more documents based on the outcomes of the screening process.

Completing the screening process and additional studies that may arise from it is an important step towards complying with the RSB standard. However, in order to achieve certification, you must comply with the criteria and minimum requirements that are contained within the RSB standard, as well as comply with the chain of custody requirements.

RSB impact assessment process

The first step in the RSB impact assessment process is the RSB screening exercise (the tool provided herein) which assists the PO to determine what steps it needs to take to ensure compliance with the RSB standard. During the screening process the PO will do the following:

- Go through each principle and its criteria and determine the scope of work that needs to be done to ensure compliance with the RSB standard
- Determine whether or not an environmental and social impact assessment (ESIA) is required (see RSB-GUI-01-002-03), or a rapid environmental impact assessment (RESA – see RSB-GUI-01-002-04) is required, or if any specialist impact assessments will be required. The specialist impact assessment guidelines can be found on the RSB web site <http://rsb.epfl.ch>
- Determine whether or not stakeholder consultation is required

Note: Specialist impact assessments included in the RSB impact assessment process as separate and discrete documents and processes are i) social impact assessment RSB-GUI-01-005-01; ii) land rights impact assessment (RSB-GUI-01-012-01; iii) water rights, availability and impact assessment (RSB-GUI-01-009-01; v) food security impact assessment (RSB-GUI-01-006-01); vi) soil quality impact assessment (RSB-GUI-01-008-01); vii) Conservation impact assessment (RSB-GUI-01-007-01).

Regional differences identified during the screening process, should be taken into account. The impact assessment process must also take, as its starting point, the laws that relate to ESIA regulations in the host country. In this case, if an ESIA or an Environmental Impact Assessment (EIA) is required by law for a particular operation, successful certification will be dependent on approval by the regulating authority. All thresholds observed by the regulating authority in the host country are recognised by the RSB. In some cases where the RSB thresholds are higher, or the process more extensive; the highest requirement must be observed.

Regardless of the impact assessment process followed all operators are required to complete the RSB environmental and social management plan (ESMP), a document that provides a summary of potential impacts assessed, mitigation plans developed as well as describing how the PO will manage and monitor environmental and social risk over the lifetime of the project and how it will respond to changes. For more information on the impact assessment process please refer to the document “RSB impact assessment guidelines” (RSB-GUI-01-002-01).

The RSB impact assessment process is the entire process of screening, impact assessment and the development of environmental and social management plans (ESMP). The impact assessment process must be completed by all POs at the point at which they wish to enter the RSB certification system to comply with the requirements under principle 2.

Which participating operators does the screening process apply to?

It applies for greenfields developments, existing operations and extension of operations. It only applies to the specific aspect or part of the development for which certification is sought. Where specified, it may extend beyond the boundaries of operations (if impacts beyond these boundaries are anticipated and these impacts are included in the requirements of the RSB standard).

The screening tool

Section 2 of this document contains the questions that an operator is required to answer during screening. If the screening process indicates that there are unlikely to be significant negative environmental and social impacts, the PO can proceed directly to the environmental and social management plan (ESMP), indicating therein how it will demonstrate compliance against all other principles and criteria. In this case the PO will not have to complete a RESA or ESIA.

If the screening process indicates that impacts are expected to be significant, the PO will be required to carry out impact studies, the extent of which is determined by the nature and magnitude of the anticipated impacts and the scope of the project. For each principle and criterion, there are specific questions that need to be answered. The answers to these questions determine whether the PO needs to complete specialist impact assessments which will in turn determine whether not an ESIA or RESA is required. If more than two specialist impact assessments are required, the operator will have to complete an ESIA. If two or less specialist impact assessments are required, the operator may complete a RESA instead.

For more information on completing an ESIA, please refer to the RSB ESIA guidelines RSB-GUI-01-002-03

For more information on completing a RESA, please refer to the RSB RESA guidelines RSB-GUI-01-002-04

Guidelines for specialist impact assessments

Whilst the screening process may appear to be a yes/no process, it is, in reality, more complex than that. In order to answer many of the questions, the PO will need to do studies, assessments and base line assessments. The intention here is to allow the PO to make an initial evaluation against the principles and criteria, without having to employ outside experts.

However, if the screening exercise triggers a specialist impact assessment, this must be done by outside experts. The system has been left deliberately flexible, so that the differences between the many participants applying the standard can be taken into account. Larger, more intensive/extensive biofuel operations are likely to require more studies.

Additionally, the screening could enable the operator to change its plan, by altering potential activities that may result in significant impacts, thus avoiding costly and time consuming impact assessments. This will not be possible in all cases, and impact assessments are required for ongoing monitoring plans. However, flexibility does not mean that auditing will be lax.

Auditing of the screening process

The auditing process will assess whether or not the PO has chosen the correct path of impact assessment. Whatever is stated must be proven. This may be simpler for smaller operators as physical verification can be easy. For medium, and large operations, and for small scale operations that are in sensitive areas, the RSB advises all POs to keep high quality records of the base line status at the onset of screening. These documents will verify the POs decision and help if unanticipated negative impacts are later observed near the project that are unrelated to biofuel operations. Annexure 1 provides information on what is expected from each PO and gives advice on how and what POs should document.

The use of experts

The screening exercise that follows is intended to be simple and clear enough that it can be completed by non-expert POs. While the RSB does not require the use of experts to complete this exercise, if one's operations are large, or the agricultural or industrial operations are taking place in an environmentally or socially sensitive place, it is advisable to utilise the services of social and environmental impact specialists to help with the screening exercise. The use of such experts will ensure that important potential impacts are identified at the early stage of screening so that through the impact assessment process measures can be taken to ensure that operations are in compliance with the RSB Principles & Criteria. If potential social or environmental impacts from the operations are not identified during the screening, but are later observed during the auditing process, successful certification could be jeopardised. It is thus the responsibility of the PO to ensure a robust and thorough screening process is carried out.

Below we provide a rough guide of when to include experts, even during screening. The list is not intended to be exhaustive, and there may be more cases when the use of experts is advisable. Note that ignorance is not an excuse for missing important issues. If the PO is not rigorous in identifying potential impacts it could jeopardise certification.

Note: If biofuel operations applying for certification do not fall into this list it does not mean that it will not have impacts. A 2Ha cultivation area could, if done in an environmentally sensitive area, have greater impacts than a 2000 ha area on land that is under cultivation or pasture.

- If operating on land that has not been under cultivation or used for pasture in the past five years (lands such as these are likely to have conservation values that need to be assessed for their importance or the land may have been used for social or cultural purposes more recently).
- In regions of poverty and /or regions of food insecurity, social impacts may require expert knowledge in the screening process, particularly if the operation is medium to large scale.
- Where land tenure regimes are weak.
- Where land will be used for biofuel operations that was previously used by rural poor people for livelihoods or subsistence, (including permanent fields, shifting agriculture and fallow, and collective use of forests and rangelands), even if such poor people have voluntarily agreed to relinquish the land, expertise on social issues may be indicated.
- In areas where biodiversity is known to be rich and complex, biodiversity and conservation experts may be indicated
- Where consent to land transfer among affected households is required, where detailed agreement on the nature of compensation and how it will be distributed locally is necessary and/or where there is insufficient understanding among affected households of the future implications of their choices for customary land uses and income generation potential.

1.2 PURPOSE OF THE SCREENING PROCESS

The purpose of the screening process is to help POs ascertain the extent of the (environmental and social) impact assessment that must be undertaken. It is in the interests of the PO to ensure that the process is done diligently as many impacts cannot be mitigated once implementation has begun.

The screening process enables the PO to go carefully through each principle and ensure that negative impacts will be addressed through the impact assessment process and ensure that benefits are optimised. It will assist the PO to plan the impact assessment process carefully and ensure that all of the correct documentation is in place.

This document provides the PO with notes that may help it navigate through the screening exercise and beyond. During the screening process the PO gathers existing documents and determines what assessments and studies are required. On the basis of this information and

knowledge, The PO can then successfully develop the frameworks for gathering additional information and to plan the way forward.

The questions contained in this tool are designed to help the PO determine what level of analysis may be required when undertaking the impact assessment process in order to comply with principle 2 and related work under the other principles. As principle 2 provides the framework for the ecological and social impact assessment and management process, it cuts across many other principles and criteria.

2 SCREENING PROCESS

2.1 PART 1

This section describes the requirements of the screening process.

2.1.1 General requirements for all POs

During the screening process, the PO must go through all principles and criteria and determine which processes apply to its operations. A table listing general requirements for POs is attached as annexe 1 but please note that this does not cover other aspects of the standard or its requirements such as those of the chain of custody. Once all documentation and letters of authority relating to biofuels operations have been collected as per the list in annexe 1, the PO is expected to work carefully through the principles and criteria and ensure that its documentation complies with RSB requirements for social and environmental impacts. Please note that the screening process is only part of the RSB requirements. The self risk assessment and other requirements such as for chain of custody of the RSB can be found separately to this process on the RSB web site.

2.1.2 Requirement for impact assessment

The following is intended to guide the PO on when and if to do an ESIA or a RESA.

- Operations on more than 1000 Ha of contiguous land (allowing for road and other infrastructure to break the contiguous nature) which is coming into production for the first time or has been out of production for over five years, are required to complete an ESIA, even if specialist studies are not triggered by the screening process.

Note: contiguous means that the farm is essentially one farm under one management (as opposed to many small farms that have come together for the purposes of being a participating operator), and that the distances between fields are small. The contiguous nature can be broken by areas set aside for ecological conservation or management, rivers and dams, or for roads and infrastructure. The intention here is to differentiate between POs that have large operations on one area and a PO that is made up a large number of smaller farms owned by small scale farmers or operations who have joined together for the purposes of RSB certification.

- An exception to the above is that if the PO has 1000 ha of contiguous land that will be used for biofuels, which has been in continuous use for agriculture for the past five years or more, and where the same crops and the same agriculture practices will be used for biofuel operations, these operators only need to complete an ESIA if the screening tool triggers 3 or more specialist studies; a RESA is required if up to two specialist studies are required.
- In all cases, regardless of size, where the screening process triggers more than 2 specialist impact assessments, an ESIA is required.
- If the screening process triggers up to two specialist impact assessments the PO must complete a RESA
- The PO must complete specialist impact assessments where they are triggered during the screening process
- If the screening exercise indicates that there are a large number of less significant impacts across all of the criteria in the RSB standard, which need attention, these can be addressed within the ESIA or RESA if applicable, or directly through and in the ESMP.

If none of the above is relevant, in other words, the land has been used continuously (which includes time allocated for fallow periods) for agriculture for the past five years and no significant social and environmental impacts during the screening exercise (from section 2.3.1 in this document) are anticipated, and the PO is not required to complete either an ESIA or a RESA, the PO can proceed to completing the environmental and social management plan (ESMP) described in the RSB document reference RSB-GUI-01-002.

Note to PO: During the screening exercise you are likely to encounter impacts of a non significant nature that nonetheless require attention. They can be dealt with adequately under an ESMP, to ensure that the impacts are mitigated and not allowed to develop into more significant impacts over time.

Note: a **stakeholder engagement process** is required if the PO is required to complete an ESIA or a RESA or specialist impact assessments. The extent of the stakeholder engagement process is determined by the impact assessment required. A RESA for instance, will, in all likelihood involve a less extensive stakeholder process involving only the relevant interested & affected stakeholders. An ESIA requires a comprehensive stakeholder consultation process.

Whether an ESIA or a RESA is required can sometimes only be determined on completion of the full screening process. Therefore the screening process will return the PO back to section 2.2.2 of the screening process.

2.2 PART 2

This section contains some broad questions related to the overall screening process. It will help the PO to understand if they are required to do comprehensive studies or not.

2.2.1 General assessment

For biofuel feedstock producers

- Are the biofuel operations on more than 1000 Ha of land

If **YES** answer the following question

- Has the land been used within the past five years continuously for farming activities (which includes fallow land, range land and pastoral land)?

If **YES** to both questions above – the operator does not have to complete an ESIA or a RESA unless specialist studies are required (If two or less specialist studies are required, a RESA is required; if three or more specialist studies are required an ESIA is required).

If the answer is **YES to the size (i.e. 1000 Ha or more), but answers NO** , the land has not been farmed continuously for more than five years, the PO has to do an ESIA and continue with the screening exercise to determine which, if any specialist impact assessment are required which are supplementary to the ESIA.

Note: continuous cultivation includes practices like shifting cultivation and the practise of allowing land to lie fallow for a period of years

2.3 PART 3 - SPECIFIC REQUIREMENTS UNDER EACH PRINCIPLE AND CRITERIA

This section of the document is the screening tool, where the PO will answer questions based on each principle and criterion that will allow it to determine what specialist impact studies will be required and hence whether an ESIA or a RESA is required.

Notes to POs

It is essential that any data gathering done during the screening process is well documented. Meetings (formal or informal), bilaterals, discussions, communication and studies should be recorded to prove how information was gathered and which documents the results of the consultations. These records will be required at least at the first audit to prove how decisions were taken and questions were answered. Thereafter they will assist the PO if impacts are identified that are not the result of the Biofuels operations.

2.3.1 Principle 1

- Is an ESIA or EIA process required in your country/province or local/district area for the activity that you are proposing or currently operating?

If YES - continue with the screening process but ensure that you streamline this screening process and the RSB requirements with the regulatory requirements of the country in which operations take place. It is also important to remember that whichever threshold is highest (government regulated or RSB) is the one that must be observed.

2.3.2 Principle 2

2.3.2.1 Social Impact Assessment (SIA)

The social impact assessment guidelines outline the social impact assessment process. They can be found in RSB-GUI-01-005-01

Notes to operators

Most questions asked here require basic information that is not always available, especially in countries that are less well regulated and thus it may be necessary to gather data specifically to answer the questions.

If you are a medium to large scale operator working in a country where poverty is rife, it may be advisable to utilise the services of a social expert. This is particularly important if the operator intends to utilise land that has been used previously for subsistence of any kind (see principle 5, 6, 9a and 12 in this screening document for guidance on possible impacts on rural livelihoods, food security, land rights and water rights). If you ascertain that there is potential for significant social impacts, a social impact assessment is indicated. The results should be integrated with other studies that related to social issues such as land, water rights, food security and so on. Informal and bilateral consultation with the local community, special groupings like women, youth, vulnerable and indigenous people as well as local authorities, school teachers, health practitioners, health care officials, political and tribal leaders and so on, is advised for data gathering. You may need to observe the activities on the land targeted for Biofuels at various times of the day and year (if possible) in order to truly assess all possible impacts, as impacts vary depending on the seasons. The auditor may seek out information from the local community when the audit is carried out, and they are likely to reveal inadequacies in your process if they exist, whether immediately, or if and when impacts become more obvious.

The scale of the biofuel operations is important, large and medium scale operations are likely to have more significant impacts on rural poor communities.

For small scale farmers, impacts are expected to be minimal and it is unlikely that they will need to gather data or require a social expert. However, POs made up of many small scale farmers, particularly if the farms are contiguous may potentially have impacts.

If POs have already generated data required for regulated assessments and approval on health and safety issues within the country in which they are working, the information from these studies should be used to answer the following questions as this will avoid duplication of work.

Screening questions

- Will the biofuel operations negatively impact any of the following?

A: Livelihoods, economic development and infrastructure utilised by communities

- Negative impacts on existing employment and number of jobs, whether formal or informal, full or part-time.
- Ability of households residing in the area affected by the biofuel development to continue with existing employment
- Reduced returns from or loss of livelihood activities such as (but not limited to) fishing, hunting, grazing, gathering of: wood, medicines, nuts, wild fruits, building materials
- Loss of any local economic activity such as (but not limited to) agriculture, ecotourism, fishing, hunting, biomass resource production, forestry, energy production, small business activities
- Loss or reduced access to community support structures whether formal or informal including but not limited to schools, crèches and child care facilities, clinics, hospitals, dwellings, local suppliers of food and household goods, grain or saw mills, markets, libraries, offices of local CBOs and NGOs active in the community, meetings halls, welfare offices
- Loss of access to communally utilised infrastructure including but not limited to such as roads, bridges, ferries, boreholes, water pumps or irrigation facilities, dams, sanitation facilities, energy supply production facilities
- Loss of access to resources currently used by the community such as water, biomass, game, livestock, communal areas and land
- Reduced or loss of formal or informal rights of passage including but not limited to roads and paths

Will biofuel feedstock operations be likely to have any of the following impacts?

B: health, safety and pollution

- Increased traffic risk such as (but not limited to) trucks driving through villages or towns that have not previously experienced such traffic
- Increased traffic on local dirt roads that pass close by communities
- Increased noise that can be heard by, or will disturb local communities, through agricultural equipment, traffic, agricultural activities including irrigation or spraying, harvesting, collection, burning, energy production
- Increased air and local water supply (including but not limited to water used for household or everyday use, subsistence, farming and small businesses) pollution as a result of agricultural activities including burning, pesticide and fertilizer use.
- Increased risk of infection by vectors that are known to increase due to the agricultural production

C: Social and cultural cohesion

Will biofuels operations likely to have the following impacts?

- Introduce migrant labour into a poor community or a community where migrant labour is likely to disrupt social cohesion
- Disrupt social structures in the community
- Densify and concentrate settlements
- Remove or reduce access to places of cultural, spiritual importance to any ethnic groups residing in the area of dependent on local resources (including but not limited to burial places, churches, places of worship, areas of spiritual significance, meeting places, gathering places).

If the answer to all questions above is **NO** – than it is unlikely that the biofuel operations will have significant social impacts and thus a social impact assessment is not indicated. However, the PO must continue with the screening process.

Note: Significance of impacts would be both determined by the potential impact as well as how many people will be impacted.

If **YES**, (that the impacts are likely to be significant, a social impact assessment (SIA) must be carried out in accordance with the specialist impact assessment RSB-GUI-01-005-01. The PO must additionally carry on with the screening process.

If YES, but the impacts are likely to be small or less significant, these impacts can be addressed by taking note of them and including them in the scoping process of the ESIA or RESA or related specialist studies. Alternatively, if not RESA or ESIA is required, these issues can be addressed through the ESMP.

Continue with the screening process

2.3.2.2 Stakeholder Engagement Process

Notes to operators:

The extent of stakeholder engagement required by a PO is best determined once the full screening process has been completed. If the screening process indicates that a stakeholder engagement process is required, the PO should consult the RSB impact assessment guidelines section 2 (RSB-GUI-01-002-01) which has detailed guidelines on doing such stakeholder processes¹.

Guidance on how to do stakeholder engagement can be found in the RSB impact assessment guidelines section 2 on stakeholder engagement RSB-GUI-01-002-01.

¹ It is recommended that the PO read, as a first introduction to stakeholder engagement, a document prepared by UNEP on stakeholder engagement in biofuels which can be found at www.unep.fr/energy/bioenergy (Issue Paper 4 – stakeholder engagement).

Screening questions

- Have you encountered resistance to the proposed biofuel operations during any of your interactions with the local community or interested and affected stakeholders on any issues that may signify the start of a more sustained opposition by such stakeholders?

If YES, (that there appears to be a number of directly affected stakeholders and/or interested and affected parties, particularly those in leadership that may be opposed to the biofuel operations), a stakeholder process to identify and uncover all potential issues is indicated.

Note to PO – it is in the interests of the PO to ensure that stakeholders are, in general, satisfied with the proposed process of stakeholder engagement. It is not possible to make all stakeholders happy all of the time, but sustained opposition by a directly affected stakeholder group, or a group that could demonstrate that you are not compliant with any of the principles and criteria may jeopardise your ability to acquire certification. The principle of Free Prior & Informed Consent (FPIC) applies in all cases where indigenous or local stakeholders may be impacted by the operations

- Has (or will) the screening process indicated that you are required to complete an ESIA or a RESA or a specialist impact assessment?

If YES, a stakeholder process is required for both these processes (see guidelines on stakeholder engagement contained within the RSB impact assessment guidelines RSB-GUI—01-002-01.

If NO (to both questions above), you may still be required to do stakeholder processes for the specialist impact assessments.

Note to operators - you are free to involve whatever stakeholders you wish if you think they can help you in your operations. Not having a requirement for a formal stakeholder process does not preclude from doing one in any case

2.3.2.3 – Business plan

A business plan has to be completed by all POs (except biofuel blenders) seeking certification. For small scale farmers this would be a basic plan indicating input costs and expected outputs. For small, medium and large scale operators where capital inputs are extensive, this plan will be more comprehensive. It is essential to include in the plan long term viability of the operations based on the farming methodologies as well as the costs required to implement biofuel operations in line with the RSB requirements.

2.3.3 Principle 3 – GHGs

The PO will need to integrate any processes carried out during the determination of the GHG emissions into the RSB impact assessment process and report on GHG emissions in the ESMP.

The RSB has developed a tool for the assessment of GHGs and all operators are required to use this tool to be compliant. Within the standard there are threshold requirements that need to be observed by the PO. These requirements differ whether you are a feedstock producer, feedstock processor, and biofuel producer or biofuel blender.

2.3.3 Principle 4 – labour rights

Note to PO: Medium and large scale and intensive small operations are likely to employ many people. The requirements under principle 4 are extensive. It is advisable that POs with a medium to large workforce complete a written labour management plan that details how POs will comply with the RSB requirements in principle 4 and its associated criteria.

Screening questions

- ❖ Will the use of slave labour occur in the biofuels operations
- ❖ Will biofuels operations pay less than the regulated minimum wage
- ❖ Will biofuels operations employ children at or under the school-going age of 14 (unless they are working in their own family farms)

If the answer is **YES** to any of the above statements, the PO and its operations cannot be certified unless the situation is rectified in accordance with the RSB principles and criteria, as none of the above are allowable under the standard.

If **NO** to any of the questions above, the PO can continue with the screening process and demonstrate compliance with the RSB principles 4 and its criteria.

Continue with the screening process

2.3 5 Principle 5 – Rural and Social Development

Screening questions

- Are biofuel operations taking place in a region of poverty?

If **YES**, the PO must scope out the extent of potential upliftment opportunities for communities located adjacent to biofuels operations according to the requirements in principle 5 and continue with the screening process.

Note to PO – if an SIA and/or a food security impact assessment is required, the work under this principle should be integrated with this work. If biofuels operations are taking place in a region of food insecurity, the plans and activities to comply with criterion 6b should be integrated with the plans under principle 5.

If **NO** (operations are not in a region of poverty) - continue with the screening process.

2.3.6 Principle 6 – Food Security

Note to operators: It is the responsibility of the PO to determine if it is working in a region of food insecurity. The definition of food security can be found in the RSB definition documents and includes the full definition as used by the FAO.

The food security impact assessment process can be found in the food security guidelines in RSB-GUI-01-006-01.

Screening process

- Are biofuel operations taking place in a region of food insecurity?

If YES, the PO must answer all of the questions in this section (2.3.6.1) and thereafter continue with the screening process.

If NO, continue with the screening process at section 2.3.7

2.3.6.1 – Food security impacts – criterion 6a

If the answer is **YES** to any of the following questions your impacts on food security are likely to be very low. However, you are still required to complete section 2.3.6.2.

- More than eighty percent of the biofuels feedstock production of the biofuel operations will come from an outgrowers scheme of smaller than 10Ha plots where the farmer (or her/his family) has had tenure or ownership on the land for more than 10 years with no disputes on the land tenure AND where the outgrower activity will not impair the farmer or his family to continue with family farming for subsistence food to the same extent as was done prior to the start of biofuel operations; or
- The land proposed and currently being used for biofuels feedstock production has not been used for food production (subsistence or commercial) for the past five years AND has not been set aside for fallow land management AND has not been set aside by the local community or local leadership or government or the relevant authority for food production into the future; or
- The land proposed and currently being used for biofuel feedstock production is not on land that has provided livelihood support or pastoral activities for the past five years; or
- Intercropping, increased yields or other methods of biofuel feedstock and food production from the land ensures that food production (of the type favoured by local communities i.e. staple crops) remains at least equal to what it was prior to biofuel operations; or
- There are sufficient stable yield increases of staple food crops destined for the local market on land or sufficient additional household production or contracted labor

(contracted by the PO) within the same local area to equal staple food production prior to biofuel operations.

2.3.6.2

If the answer is **YES** to any of the following questions, the PO is required to complete a food security impact assessment as described in the food security guidelines RSB-GUI-01-006-01.

Note to PO: The following questions should be answered through community consultation processes where such questions are asked in (minuted) meetings with the local communities surrounding the site. It is recommended that the stakeholder engagement processes outlined in the ESIA guidelines (RSB-GUI-20-001) are consulted to learn about how to carry out such activities successfully in the event that a social expert is not used. For food security impacts, in particular, it is critical to ask women from developing and emerging economies as well as local clinics and nurses and local authorities as they tend to be the carers and food producers and cooks in the homes. The answers they give will determine if further work is required. The gathering of information required to answer these questions should be combined with gathering of information under principle 2 to determine if a social impact assessment is required or not (see section 2.3.2).

- Are your proposed or existing operations on land that has been used since 1st January 2009 in regions of poverty (as defined under principle 5) for livelihood support such as (but not exclusive to) gathering of wood, medicines, building material, fruit and nuts, subsistence agriculture, water collection, use of trees or vegetation for any activity that supports income creation or that avoid livelihood income expenditure of any kind; or
- Are your proposed or existing operations switching crops away from, or producing less locally consumed staple food crops to crops that are feedstocks primarily aimed at biofuel production; or
- Are biofuel operations expected to reduce market access by local poor communities to the staple foods or weekly purchases that they traditionally purchase from local markets, shops and purchase points (formal & informal); or
- Are biofuel operations expected to remove availability of staple goods or food stuffs or traditionally purchased household goods from local markets or shops (formal or informal) where local communities traditionally shop.

If **YES** to any of the above, the PO will be required to complete a food security impact assessment and continue with the screening process.

If **NO** to all of the above, the PO can proceed to section 2.3.6.3 and no food security impact assessment is required, but the PO will need to carry on with the screening process.

2.3.6.3 Food security enhancement- criterion 6b

Notes to operators: The extent of the work to be done under 2.3.6.3 depends on the scale of the operations. Large and medium operations will have more requirements than a small operation. As with 2.3.6.1 and 2.3.6.2, the base line status will be important, as the PO will need to demonstrate improvements to the food security status of local stakeholders who were food

insecure to start with. Written documentation is advisable for the large and medium operations; however compliance by small scale operations can be determined by verbal agreements with its workers or the local community. This is also applicable to for the enhancement of food security of directly affected local stakeholders. Guidance on how to improve food security can be found in the food security guidelines RSB-GUI-01-006-01

2.3.7 Principle 7 – Biodiversity and Conservation

notes to operators:

Principle 7 addresses impacts on conservation, which includes biodiversity and other ecosystem-related aspects. It requires the PO to maintain or enhance conservation values of local, regional or global importance in the area where biofuel operations will take place; no conversion of such areas is permitted under the RSB standard after January 1, 2009. Conservation values of local, regional or global importance include an outstanding level of biodiversity, natural ecosystems, protected areas and provision of important ecosystem services. While conservation values could include those of a social nature, many of these are covered under the social principles and thus the RSB has limited the social impacts covered under principle 7 to the value and benefits of ecosystem services to people and communities.

Biodiversity, conservation and ecosystem management is a highly specialized field. Determining the conservation values of an area can be a complex process, and the loss of such values is often irreversible once transformation of the land takes place. As noted above, failure to conserve certain conservation values, be it on a new or existing production site may mean that achievement of certification is difficult or continued certification can be withdrawn. Additionally, biodiversity, ecosystem and conservation issues attract a lot of interest internationally and there are many international organizations, NGOs and local organizations all over the world involved in protecting these valuable resources. Expertise and counseling on planning, designing and implementing biofuel operations might be found among such organizations.

The identification of conservation values should be a combination of desk and field work, in consultation with local experts and communities, and takes both conservation and economic aspects into consideration. It may include: 1) the review of publicly available data and maps; 2) landscape-level assessment, i.e. the consultation of national/regional experts and institutions, 3) site-level mapping, i.e. a detailed site-level assessment and planning through the consultation of local conservation organizations, communities as well as larger farmers, local leaders and elders. Please consult the RSB Impact Assessment Guidelines (RSB-GUI-01-002-01) for more details about stakeholder engagement.

The Ecosystem and Conservation impact assessment and guidelines are to be found in RSB-GUI-01-007-01.

Screening questions

Has the land been used continuously for the past five years or before the 31st of December, 2008², whichever earlier, in agricultural practice, and pastoralism and will the same agricultural practices be used and crops are grown as before, without any additional conversion of previously set-aside land, fallow land, hedge rows or buffer zones?

If YES, you are not required to carry out a specialist conservation impact assessment (as per RSB-GUI-007-01). Please proceed to 2.3.8 and continue with the screening process.

If NO, please proceed to 2.3.7.1 to determine if there are likely to be significant impacts on conservation values of global, regional and local importance.

2.3.7.1` Section 1 – No-go Areas

Screening questions

Are Biofuels operations proposed to take place on, or convert, part of or all of the following areas?

- UNESCO World Heritage Sites (unless authority/permission has been granted [in writing] by the heritage authority to carry out the operations for which certification is being sought)
- RAMSAR sites
- On an area identified by the Alliance of Zero Extinction of Species (AZE) as being critical for an endangered species
- Areas that are included in IUCNs list of protected areas category 1 or 2 unless the activity complies with IUCN approved activities within such designated areas

If YES, biofuel operations cannot be certified in these areas as they are considered NO-GO areas, unless feedstock production or processing operations are legally authorised as part of the conservation management for the area concerned. Please continue with the screening process

If NO, please proceed to the 2.3.7.2 and continue with the screening process.

2.3.7.2 Section 2 – No-conversion Areas

Are Biofuels operations proposed to take place on or convert part of or all of the following areas?

- Ecological corridor
- Buffer zone
- High Conservation Value areas (HCVA)

² Note that earlier cut-off dates may apply for certain feedstocks following Criterion 7a. Please look at the Guidance Document (RSB-GUI-01-000) for the list of earlier cut-off dates.

- Key Biodiversity Area (KBA)
- Important Bird Area (IBA)
- IUCN Protected Areas 3 or 4
- Natural and semi-natural ecosystem of importance
- Landscape-scale forests and ecosystems
- Highly biodiverse grasslands and savannas or with conservation value of local regional or global importance
- Important areas recognized by the EU based Natura 2000 network
- Lands with important carbon stock,
- Wetlands (i.e. mangroves)
- Natural or semi natural forests that have high conservation value

Or does the area contain any of the following conservation values?

- Presence of rare, threatened or protected species, including any species included in IUCN red list under the categories “vulnerable”, “endangered” and “critically endangered”
- Pristine ecosystems
- Presence of viable populations of natural species in natural pattern of distribution and abundance, i.e. natural ecosystems, with a limited influence from human activities.
- Outstanding biodiversity level, as per the definition provided in the Glossary of terms (RSB-DOC-001-01).
- Ecosystem services of local, regional or global importance, i.e. those services important for survival of species, subsistence and/or livelihood.
- Cultural importance from a local, regional or global perspective.

If YES, a specialist conservation impact assessment is required in order to be able to use the area for Biofuels (see RSB-GUI-007-01); the area can be used but the conservation values shall not be converted and must be maintained or enhanced. Please continue with the screening process in 2.3.7.3.

If NO, please report any other conservation values in the ESIA or RESA or if no impact assessment is required, in the ESMP and mitigate potential impacts to ensure their conservation. Continue with the screening process.

2.3.7.3 Section 3 – Invasive Species

Are you cultivating invasive species in your operations?

If YES please continue with the questions in this section

If NO, please proceed to section 2.3.8 and continue with the screening process

Is the invasive species that you are cultivating prohibited by government?

If **YES**, you cannot apply for certification for these species

If **NO**, (you are cultivating an invasive species that is allowed by the government of the country in which operations are taking place), you are required under the RSB standard to seek additional information about its invasiveness from data bases such as the Global Invasive Species Data Base (GISD).

If the species is recorded as highly invasive under similar conditions (similar climate, and similar local ecosystems, and similar soil types), then this species cannot be certified for use by the RSB if used for cultivation for the production of Biofuels.

If the species is not highly invasive under similar conditions (as above) then the PO must complete a weed assessment according to criterion 7e (see also RSB-GUI-01-007-01).

Please continue with the screening process.

2.3.8 Principle 8 – Soil

Note to PO: Soil is critical to successful cultivation. The requirement under this principle is limited to feedstock producers only. It is critical to know the condition of the soil at the start of the cultivation practices (base line assessment) and the RSB will require this information in order to be able to assess ongoing impacts and to determine if the soil is improving or deteriorating.

Feedstock production using industrial agricultural practices such as tilling, ploughing, mechanical harvesting, and application of chemical fertilizers are all highly damaging to soil. Given the requirements under principle 8, it is unlikely that an intensive industrial commercial feedstock production operation would meet the requirements of the RSB standard without the development of a comprehensive soil erosion and protection plan. This in turn cannot be developed without a) a survey of the soil conditions on the site and in the adjacent areas to the site b) analyzing and understanding the general characteristics of the soil and determining soil health and quality at the outset and c) establishing, (through using many methods that include local indigenous knowledge), issues that may not be obvious at first glance about the soil or land beneath the soil; and d) analyzing the potential impacts of the biofuel operations on the soil. It is advised that if industrial agricultural practices are to be applied to the soil, the operator carries out a soil impact assessment and mitigation plan. This is indicated in particular for large and medium operations, as well as small scale operations applying intensive industrial cultivation practices. If the operator puts in place agricultural practices that minimize the risks outlined below, independent soil impact assessments may be avoided.

The soil impact assessment is described in the RSB document: RSB GUI-01-008-01

- Do any of the following apply to the cultivation area or immediately adjacent to biofuel operations:
 - Will land clearing be required for cultivation and if so will topsoil be lost? will soil be lost?

- Will mechanical tillage, ploughing and harvesting be standard agricultural practice?
- Are biofuel operations planned on soil that is exposed to erosion (water and wind) and in a waterlogged area
- Are biofuel operations planned on or near sensitive soil types
- Will biofuel operations involve the extensive and/or intensive use of pesticides, herbicides and chemical fertilizers?
- Will biofuel operations result in the release of untreated effluent, including sewage, into the soils?
- Is the proposed development likely to result in a measurable decrease in the quality of soil as a result of: the intended agricultural practices, crop choices, or interaction of climate, soil and crop?
- Will irrigation be applied?
- Will biofuel operations impact on future soil productivity?
- Is the proposed development likely to result in soil erosion?
- Will the proposed development decrease soil quantities?
- Is the proposed development likely to result in transgression of international agreements or national or sub-national legislative requirements?

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If YES to any of the above (that impacts are likely or possible), a soil impact assessment is required and the PO must then continue with the screening process

If NO, continue with the screening process in 2.3.9.

2.3.9 Principle 9

Note to PO: Principle 9 considers issues of water rights, water availability (usage) and water quality. To do the screening process effectively, it is necessary to understand water usage by biofuel operations and understand the water status quo in the area (water availability and who is using water). A level of common sense should be applied here to ensure that PO does not do work that is unnecessary nor omit studies that will be required.

Water usage and water rights: It is critical that the PO knows whether or not it is operating in a water stressed region. A small scale farmer withdrawing water for irrigation for a non intensive 2-10 Ha production site from a large water body or source is unlikely to have impacts. However, even a small scale operator utilising 50 HA, if irrigating in a water stressed area can have significant impacts. In poor countries, withdrawal of water from rivers, dams and lakes is commonplace, for both agriculture and for basic human health and subsistence. Water rights in these parts of the world tend to be less formal; hence water rights should be a key consideration here.

Water quality: In terms of water quality, industrial agriculture is highly polluting and therefore a high risk activity. However, minimum or low application of fertilizers, pesticides and herbicides can reduce the risk of water pollution.

All operators, except biofuel blenders, are required to complete a water management plan that demonstrates compliance with the principle 9 and its criteria.

The water impact assessment guidelines contain processes to determine water rights impacts and can be found in RSB-GUI-01-009-01.

Water impact assessment process for availability and quality of water can be found in the water impact assessment guidelines RSB-GUI-01-009-01.

Screening questions

- Are the biofuel operations 100% rainfed with no support from water collection and harvesting or withdrawal from water bodies?

If NO proceed with the rest of the screening process in 2.3.9.1

If YES, answer the following question

- Are biofuels operations at the top of a significant catchment area where it will impact on water flows into the catchment basin or prevent recharge of a communal ground water?

If NO – there is no requirement for the biofuel operator to carry out impact assessments on water rights or water availability in area – however, there may still be water quality issues, continue with screening process in 2.3.9.2.

If YES, proceed with the screening process in 2.3.9.1

2.3.9.1 Water rights and water availability/usage – criterion 9a and 9c.

- Will biofuel operations significantly affect the availability of water that is
 - a) utilized by local poor unserved communities for livelihood support at the point of withdrawal or further downstream
 - b) utilized by other water users with water rights, both formal and customary

Note to PO: significance is based on the size and replenishment capacity of the water source and it will need to consider the water needs by all other users at the point of withdrawal, and downstream. If water withdrawal unequivocally does not impact on the water use rights of others, it is not considered significant.

If YES to any of the above, the PO must carry out a water rights impact assessment

- Will biofuels operations withdraw significant amounts of water from ground or surface water sources in a water stressed area?

Note to PO: significance here means any withdrawal that contributes to the water stress in the area.

If YES the PO must scope out issues related to water availability covered under the water impact assessment guidelines

- Do biofuel operations require damming?

If YES – we advise you to check with the recommendations of the World Commission on Dams on how to develop the dam required for operations (www.dams.org).

- Will the water withdrawn for biofuel operations impact negatively on the biological, physical or chemical equilibrium of the water source?
- Will the water withdrawn for biofuel operation change the direction of the water course at its source or downstream of the point of withdrawal?

If YES a water quantity impact assessment is required

If NO to all of the above the PO is not required to complete either a water rights impact assessment or a water quantity impact assessment.

2.3.9.2 *Water quality*

- Will biofuel operations take place on a critical aquifer recharge area where pollutants and microorganisms harmful to the environment can potentially enter and pollute the aquifer?
- Will biofuel operations result in run offs of untreated effluent (including sewage) containing pollutants or microorganisms harmful to the environment into any water resource not specifically designed to deal with waste water and which has important value to nature or people?.

If YES to any of the above a water quality impact assessment must be carried out and the PO must carry on with the screening process.

If NO, continue to the next section of the screening process

2.3.10 **Principle 10**

Screening questions

- Will the following take place as a result of planned or existing biofuel operations:
 - Clearing of land through burning
 - Burning of crops, residues, wastes or by-products
 - Spraying of pesticides (especially by air)
 - Use of volatile chemicals
 - Industrial processes that will potentially release major air pollutants into the atmosphere
 - Incineration

If YES to any of the above, the PO is required to complete an air emission control plan as per principle 10 and continue with the screening process.

If NO to any of the above, continue with the screening process in 2.3.11

2.3.11 Principle 11

Where chemicals of any kind will be used in biofuel operations the following questions should be answered:

- Will you use any chemicals that are explicitly excluded by the RSB standard?

If YES, this will need to be rectified before certification can be awarded. Continue with the screening process. **If NO** continue with the screening process

The following questions are designed to help guide the PO to determine if there will be any significant impacts that result from the use of technologies in biofuel operations and if the PO is required to take any action or develop mitigation plans.

Will biofuel operations:

- involve the use of genetically modified organisms (GMOs)?
- involve the use of micro-organisms that pose a risk to human health or the environment?
- involve the use of chemicals that present risks to human health and the environment
- involve measures to recycle, treat and/or dispose of wastes

If YES, the PO will need to ensure compliance with the criteria and minimum requirements of principle 11 of the RSB standard and ensure that information on such use is fully available for scrutiny. Then continue with the screening process.

If NO, continue with the screening process

- Are chemicals and materials for biofuel operations being stored according to the requirements of the RSB standard?

If YES continue with the screening process

If NO, develop protocols for ensuring that storage is in line with RSB requirements and continue with the screening process.

2.3.12 Principle 12

Notes to PO:

The RSB standard requires that POs document and assess existing land rights and land tenure wherever they intend to carry out biofuel operations. Such a report should include an analysis of existing land tenure arrangements and capture the existing complexities of land rights and land tenure regimes in and around the biofuel operations. This base line study should be the document referred to when undergoing the screening process for land rights and land tenure

rights. Guidance on doing this base line study can be found in the RSB land rights guidelines RSB-GUI-01-012-01. As land tenure in some countries is weaker than in others and the issue can be complex, it is advisable that this base line study is carried out according to the RSB guidelines. **If** the land is in a region of food insecurity (as determined during the screening process associated with principle 6) and land tenure is weak (weak may include but is not limited to: informal or customary tenure; managed by a local chief or tribal leader; or where communal land is owned (and administered) by government), large and medium scale operators are highly recommended by the RSB to carry out a land rights and land tenure impact assessment. This assessment must be done together with the food security analysis to avoid duplication of efforts and ensure integration of issues and cross referencing across livelihood issues.

If the screening exercise indicates that a social impact assessment (SIA) is required, and land tenure issues come up during the assessment as being important and potentially significant, the land rights impact assessment and the SIA should be integrated in order to streamline stakeholder engagement. Additionally, opportunities for optimizing the benefits from biofuel operations must be considered in the land rights impact assessment, together with stakeholders, as described under principle 5.

Stakeholders for land rights and land use rights assessment are often the same as the directly affected stakeholders identified in principle 2, 5, 6 and 9a, but not always. Land authorities are often distinct entities and even at local level there may be different individuals involved in allocating land ownership to the ones involved in other social issues. The stakeholder identification process must be thorough when it comes land rights and land tenure discussions. Remember land use complexities in relation to women. Migrant workers, pastoralists, herders and/or hunter gatherers in developing countries and even emerging states can be significant as local men and tribal leaders often have tenure, but it is others, in particular women are often the users of the land. Land users under this principle have land rights, and are a legitimate and affected stakeholder.

The RSB requires that where there is sustained opposition by a significant proportion of locally affected stakeholders to the proposed use of the land, that such opposition should be removed through open dialogue and consultation if possible. Land under legitimate dispute cannot be certified for biofuel operations.

Please note: Free, Prior and Informed Consent forms the basis for all stakeholder engagement process under the RSB. In the case of land, it is highly recommended that permission to use land must be given in writing by nominated representatives of all individuals, organisations, communities or authorities that hold land rights.

Guidance for assessing land rights can be found in RSB-GUI-01-012-01.

Screening questions

Will there be any involuntary resettlement as a result of biofuel operations?

If YES, biofuel operations cannot be certified until this situation is rectified.

If NO, continue with the screening process.

2.3.12.2 Potential Loss of Land Rights

Screening questions

- Will there be any relocation of persons/communities or families from land under informal or customary tenure (including where government or another entity holds formal tenure but informal tenure governs land use)?
- Will there be any exchange of land or change in the use of land from poor communities with weak tenure for biofuel operations?
- Will the use of land for biofuel operations result in the loss of land use rights (including informal rights or rights established based on long term use) for livelihood or subsistence purposes (including but not limited to cultivation, use of land for medicines, building materials, economic activities, collection of medicines)?
- Will land acquisition or the right to use land by the PO require negotiations with illiterate and poor persons who have weak land tenure and land rights or who are using the land for a livelihood or economic purpose?
- Have interviews with directly affected stakeholders or those with weak land tenure shown opposition to biofuel operations?

If YES to any of the above, a land rights and land tenure impact assessment is required and the PO must continue with the screening process

If NO continue with the screening process

2.4 Assessment of whether or not an ESIA or a RESA is required

Answering the following questions will help you, the PO, to determine whether or not you are now required to complete an ESIA, a RESA or if you can continue onwards to completing an ESMP

Note : this section can only be completed once the screening process has been completed

The ESIA and RESA guidelines can be found in RSB-GUI-01-002-03 and RSB-GUI-01-002-04 respectively.

Note: Specialist impact assessments included herein are i) social impact assessment; ii) land rights impact assessment (RSB-GUI-01-006-01); iii) water rights, availability and impact assessment (RSB-GUI-01-009-01); v) food security impact assessment (RSB-GUI-01-006-01); vi) soil quality impact assessment (RSB-GUI-008-01); vii) Conservation impact assessment (RSB-GUI-007-01).

- Is the PO required to do three or more specialist impact studies based on the screening process in 2.3?

If YES, an ESIA is required

If NO answer the following questions:

- Are two or less specialist impact assessments required based on the screening process in 2.3?

If YES, a RESA is required

If NO, refer back the RSB impact assessment guidelines (RSB-GUI-01-002-01) for next steps, which will include completing the ESMP

Note to POs: During the screening exercise, you are likely to have picked up that a number of non-significant impacts will arise during the implementation of your operations including during the development phase. If you are completing an ESIA or RESA you can include these non significant impacts in your studies. If you are not required to complete an ESIA or a RESA, these issues can be dealt with through your ESMP. ESMP guidelines can be found in RSB-GUI-01-002-05. All impacts whether significant or non-significant nature must be mitigated through the management process that you describe in your ESMP.

2.5 Next steps

Once the screening process has been completed, you will now know if you have further studies to do. You are referred to the RSB impact assessment guidelines (RSB-GUI-01-002-01) which outlines the entire process and will guide you on your next steps. You will need to complete these steps in accordance with the guidelines.

Once you have completed all of the specialist studies required, and completed whatever plans are required and you have your Environmental and Social Management Plan (ESMP), you can measure your compliance against the RSB indicators (RSB-IND-01-001- version 2.0).

ANNEXE 1

Studies and reports required by the RSB P & Cs and minimum requirements

Principle	Study or plan	Which PO should complete and additional info
1	Report detailing all applicable regulations and compliance with the regulations	Feedstock producers, feedstock processors, Biofuels producers and biofuel blenders
2	Screening process (for the impact assessment process)	Feedstock producers, feedstock processors, Biofuels producers
	Environmental and Social Management Plan (includes the environmental and social monitoring systems)	Feedstock producers, feedstock processors, Biofuels producers
	Social Impact Assessment (SIA)	To be completed if the screening process indicates that it is required.
	Stakeholder identification analysis	To be developed by all POs where the screening process indicates that an ESIA or a RESA or specialist studies are required.
	Stakeholder engagement process	If required due to PO doing an ESIA, RESA or specialist impact assessments
	A business plan	Feedstock producers, feedstock processors, Biofuels producers
3	GHG emissions report	For 3a and 3b is for Feedstock producers, feedstock processors and Biofuels producers. 3c is for biofuel blenders only
4	Labour management Assessment according to principle 4	Feedstock producers, feedstock processors, Biofuels producers A labour management plan detailing how compliance with criteria will be met is advisable for medium to large operators Documentation will be required by auditors such as pay slips, names of workers, ages and gender, management levels, contracts (if available) etc Operators must ensure that compliance can be verified verbally by workers
5	Rural and social upliftment	Feedstock producers, feedstock processors, Biofuels producers. Only required in regions of poverty It is advisable that medium and large operators prepare a written plan Operators must ensure that compliance can be verified verbally with directly affected local stakeholders
6	Food Security Assessment	Feedstock producers, feedstock processors,

		<p>Biofuels producers and biofuel blenders Only apply to regions of food insecurity For 6a – an impact assessment study is only required if the screening process indicates significant potential negative impacts on direct food security For 6b – the PO will need to understand the food security status quo in the area where the operations take place as the PO is required to improve food security and needs to prove that has happened. The status quo report would also be necessary in order that auditors can determine if there have been impacts on food security among directly affected local stakeholders</p>
7	Ecosystem and conservation Specialist study	<p>Feedstock producers, feedstock processors, Biofuels producers. The ecosystem and conservation Impact assessment is required if it is determined during the screening process that significant negative impacts are expected for operators – a status quo report or assessment would be required as documentary evidence that the screening was completed</p>
8	Soil management plan	<p>Feedstock producers, feedstock processors, Biofuels producers and biofuel blenders All operators. This should include a status quo report</p>
	Soil impact assessment	<p>Feedstock producers, A soil impact assessment will be required if the screening process indicates that significant negative impacts are expected from biofuel operations on soil quality</p>
9	Water management plan	<p>Feedstock producers, feedstock processors, Biofuels producers.</p>
	Water impact assessment (covering water rights, availability and quality)	<p>Feedstock producers, feedstock processors, Biofuels producers The water rights impact assessment is required if it is determined during the screening process that significant negative impacts are possible The water availability and quality impact assessment is required if it is determined during the screening process that significant negative impacts are likely or possible</p>
10	Air pollution emission control plan	<p>Feedstock producers and, biofuels producers Required by operators where air pollution emissions are expected as a result of biofuel</p>

		operations
11	Waste and bi-product management plan	Feedstock producers, feedstock processors, Biofuels producers. If operators that will generate waste and by-products from biofuel operations
12	Land rights study	Feedstock producers, feedstock processors, The land rights impact assessment will need to be completed if it is determined during the screening process that there may be significant negative impacts on land rights and land use rights