

Chapter 4: Site Preparation and Peat Extraction

Impact Assessment and Planning this applies to all sites before and after cut-off-date (site preparation requirements also apply to sites from before the cut-off-date where parts of the site still need to be prepared)		
Principle 4.1: Site preparation, Extraction / Production shall follow a detailed planning based on a systematic impact assessment.		
RP Criterion	Indicators	Remarks
4.1.1 An assessment of all potential impacts on-site and off-site shall be prepared in accordance with Annex C.	A document reporting the outcomes of the assessment shall be made available to the certifying body.	A <u>guiding document</u> on contents and format is present (Annex C). The level of detail in requirements with regard to sites from before or after cut-off-date is defined in Annex C. The fact that an area is already licensed, does not change the obligation of the company to assess its impact on-site and off-site to ensure that these impacts are mitigated properly.
4.1.2 In relation to the impact assessment mitigation plan and monitoring plan is to be developed	Availability of - mitigation plan - monitoring plan	A <u>guiding document</u> on contents and format is present (Annex C)

Site Management applies to all sites		
Principle 4.2: Site management (including site preparation, extraction and production) shall minimise negative effects on biodiversity, greenhouse gas emissions and hydrology on-site and off-site.		
RP Criterion	Indicators	Remarks
4.2.1 Site preparation, peat extraction and production shall be based on a detailed management plan, including the mitigation and monitoring plan, and taking into account the requirements for after-use and after-use preparation.	Management plan including reporting of monitoring	<i>After-use: See the chapter on after-use</i>
Impacts of Operations (applies to all sites, old and new)		
Principle 4.3: Negative environmental impacts of operations (peat extraction and production) shall be minimised.		
RP Criterion	Indicators	- Remarks
4.3 Negative environmental impacts of operations shall be monitored and minimised	The company shall implement a monitoring plan and present the result to the certification body, including following aspects: <ul style="list-style-type: none"> • Effective handling and storage procedures to prevent spillage of fuel, oil or other soil contaminants shall be in place. • Effective procedures for controlling and reducing waste generation and waste disposal shall be in place. 	Specific remark: self-heating and burning peat will cause unwanted emissions. In general: the aspects mentioned in the indicators all have their individual impact on environment and therefore should be managed. This is likely already part of the licence or permit..

	<ul style="list-style-type: none">• Effective measures for preventing negative off-site impacts (including air pollution, impacts on water quality by run-off, flooding) shall be in place.• Effective precautionary measures according to site-specific circumstances shall be in place when operations are close to high conservation value peatlands.• Uncontrolled emissions shall be prevented by applying storage methods that minimise self-heating of peat in stockpiles.• Measures shall be taken to minimise negative effects on cultural values.	
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ANNEX C: SITE PREPARATION, EXTRACTION / PRODUCTION SHALL FOLLOW A DETAILED PLANNING BASED ON A SYSTEMATIC IMPACT ASSESSMENT

Introduction to P&C Chapter 4:

RPP sets minimum requirements with regard to the assessment of impacts. Workflows and guidelines in the permission process do not necessarily result in fulfilment of the RPP-requirements. It is therefore necessary that the applicant objectively demonstrates, that in the certification process, the significant effects are checked out in a proper way and impacts are avoided, minimized or even well-managed by mitigation plans.

The assessment shall identify, describe and assess in an appropriate manner the direct and indirect significant effects of the extraction site on the following factors:

- population and human health;
- biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC, Directive 2009/147/EC
- land, soil, water, air and climate;
- material assets, cultural heritage and the landscape;
- the interaction between these factors

These items are assessed in order to identify potential impacts on high conservation values as defined by high conservation value resource network¹

Content of the Requested Documents (Project Plan and EIA)

Documents, in English language, report the outcomes of the assessment and shall address at least the items listed in the EIA-check.

In addition the following technical data are required:

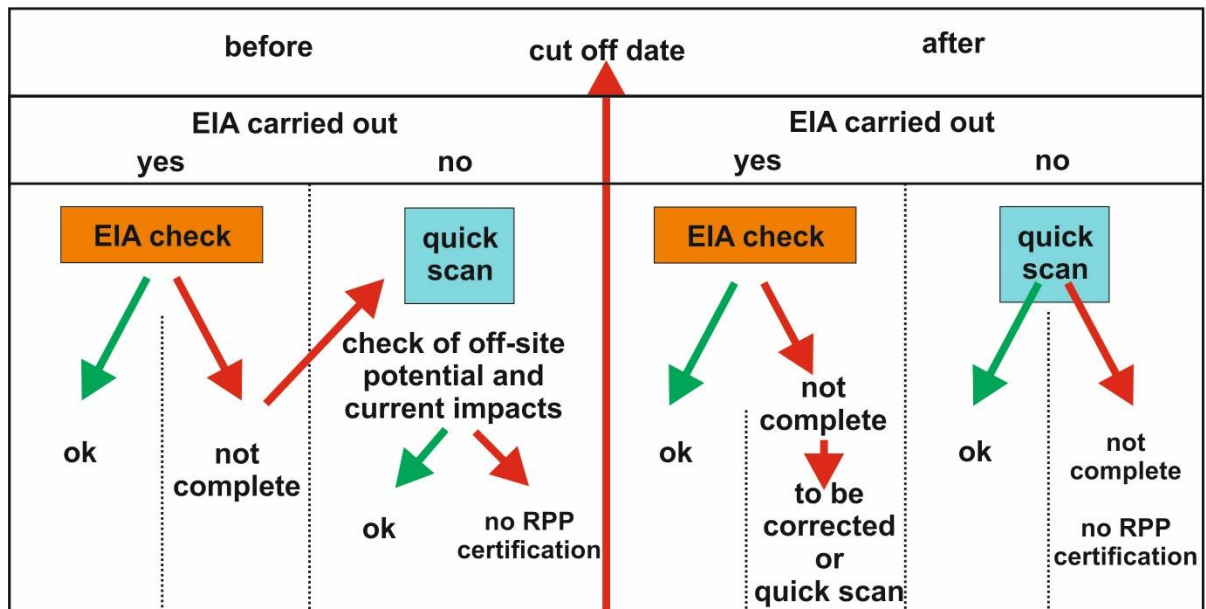
- description of the project (site, design, size and other relevant features)
- details to extraction and production plan (minimum required parts):
 - o location of the site, cadastral land register data and outlined in a geo-referenced map
 - o excavation method - timetable and technology
 - o sections for excavation (for large sites)

¹ link <https://www.hcvnetwork.org/about-hcvf/what-are-high-conservation-value-forests>

- dewatering system
- infrastructure and transport
- current height above sea level
- extraction level above sea level
- base of the peat body above sea level
- details after-use plan, as covered in P&C Chapter 5 P&C

The following scheme shows the workflow in the different cases:

1) Scheme to check impacts



2) EIA check

Usually, the structure and contents of an EIA are defined in EU and national law, and factors are well-reviewed. However, for reasons of clarity and transparency, RPP defined minimum topics and indicators, to avoid serious harm on nature.

The topics are to be assessed in the planned extraction area and its potential impact-zone. The level of detail in performing the investigations, depends on the level of off-site values which can be impacted by the planned activities. An EIA is to be performed by independent, qualified expert(s).

Minimum Topics and Indicators of the EIA

- geo-hydrological topics
assess the potential impact of bog exploitation on the hydrology in the adjacent area

SOIL

- Peat type (fen, bog)
- Thickness of different peat-layers
- Degree of decomposition (Post or %)
- Mineral underground (defining type of underground)
- Coefficient of permeability of the different peat layers
- Exact location and height of drilling points (on-site minimum 200 x 200 mtr grid and off-site transects in the potential impact area)

HYDROLOGY

- Differentiation in bog and ground water table; direction of waterflow
- Monitoring period from winter (highest water level) to summer (lowest water level)
- Surveying of location and height (elevation-model)
- Assessment of potential impacts of the effluent on surface- and groundwater off-site

– ecological topics

VEGETATION

- Mapping of biotope-types
- To register red-listed and/or protected species / biotope-types (when the adjacent area is protected under Natura 2000 or when the area fulfils criteria for FFH habitats, then the 'Natura2000 check' is to be performed ²
- Gathered data used for the EIA should not be older than 5 years at point of assessment. In case of older data, the validity needs to be re-assessed.

² link

http://ec.europa.eu/environment/nature/legislation/habitatsdirective/docs/standarddataforms/notes_en.pdf

FAUNA

- Inventory of species in relation to biotope types, when the adjacent area is protected under Natura 2000 or when the area fulfils criteria for Flora, Fauna and Habitat directives, then the 'Natura2000 check' is to be performed
- Analyses of results in relation to red-listed species.
- Monitoring methods according to EU directives
- Gathered data used for the EIA should not be older than 5 years at point of assessment. In case of older data, the validity needs to be re-assessed.

– general topics

LOCAL PEOPLE

- Information about impacts on humans, such as noise, dust and impacts on adjacent residential areas and buildings.
- Assessment of potential impacts on economic values of the area's ecosystem services, such as hydrology, water-buffering

CLIMATE

- Specific statement with regard to the expected greenhouse-gas emissions of the excavation activities (using general knowledge and national greenhouse gas inventory reports, following IPCC standards – RPP-tool)

LANDSCAPE

- Effects on the landscape (e.g. on near-natural elements, uniqueness)

CUTURAL HERITAGE

- Assessment of impact on archaeological artefacts, impacts on cultural aspects of indigenous and local people.

Review INTERACTION between TOPICS

- Show that the interaction between topics is analysed

3) Quick scan

A quick scan shall be performed by independent, qualified expert(s).

If no EIA has been carried out or EIA- data are incomplete according to RPP-standards, companies should present a quick scan explaining

- in case of sites **before cut-off-date**

potential off-site impacts in area of at least 400 m around the site, unless there is evidence that the impact zone is smaller.

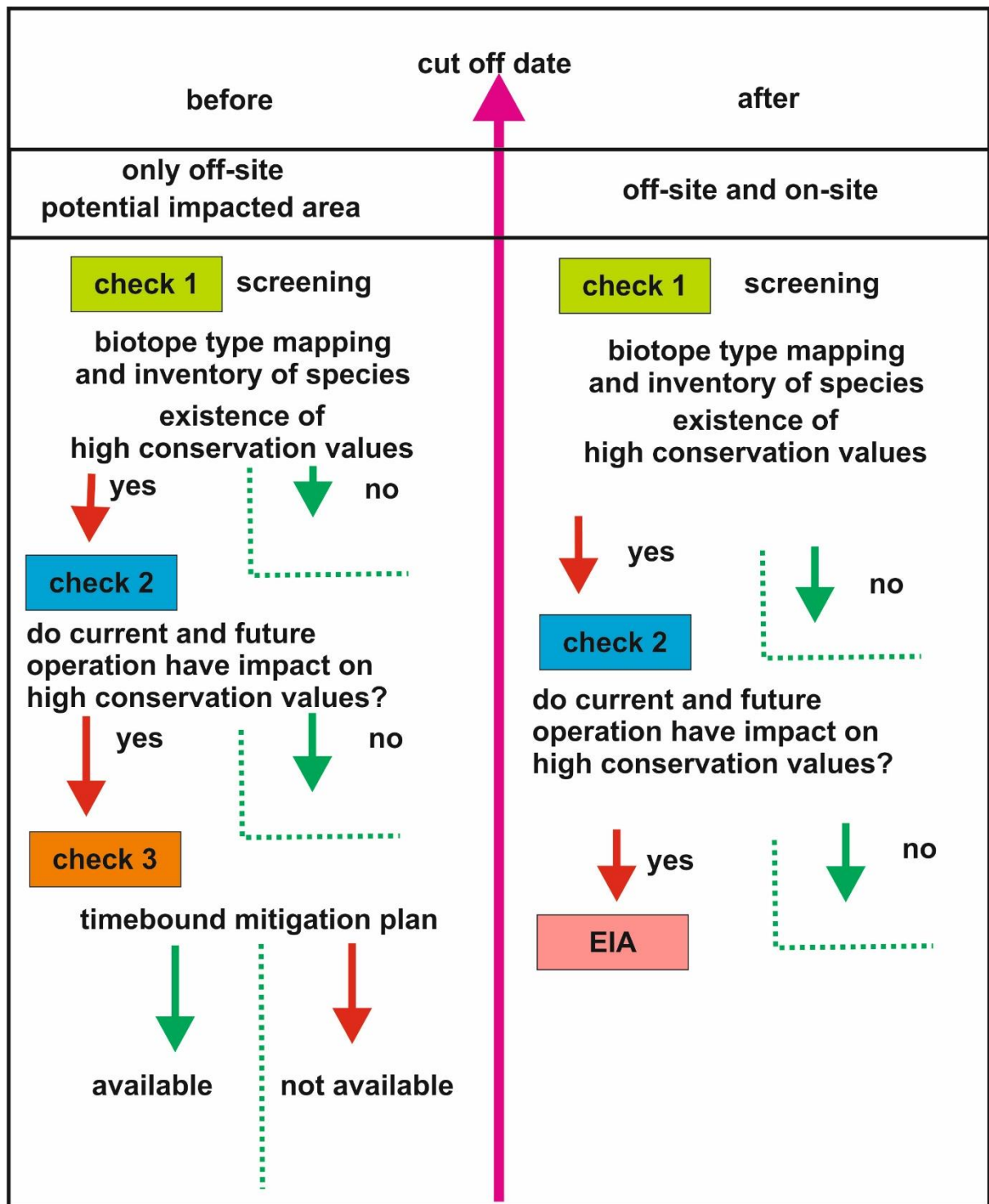
- in case of sites **after cut-off-date**

potential on-site and off-site impacts in areas of at least 400 m around the site, unless there is evidence that the impact zone is smaller.

The requirements for the quick scan (**see workflow scheme next page**) refer to potential impacts on high conservation values.

If an impact could be expected than that specific aspect has to be examined in detail.

Experts / companies may use additional data if available by national/ regional authorities, universities, experts, local/regional NGO's.



4) Mitigation Plan

A mitigation plan is needed as part for an EIA as well for a Quick scan.

The mitigation plan shall contain

- description of the features of the project and/or measures envisaged in order to avoid, minimize, rehabilitate or restore impacts and where this is not possible, consider offsets³;
- description of the reasonable alternatives studied by the developer relevant to the project and its specific characteristics, and an indication of the main reasons
- alternatives for the project / planning (location, technique...). After explaining the main reasons the chosen alternative has to be named. If there are no alternatives - just explain the reason.

The mitigation hierarchy is defined as:

- **Avoidance:** measures taken to avoid creating impacts from the outset, such as careful spatial or temporal placement of elements of infrastructure, in order to completely avoid impacts on certain components of biodiversity.
- **Minimisation:** measures taken to reduce the duration, intensity and / or extent of impacts (including direct, indirect and cumulative impacts, as appropriate) that cannot be completely avoided, as far as is practically feasible.
- **Rehabilitation/restoration:** measures taken to rehabilitate degraded ecosystems or restore cleared ecosystems following exposure to impacts that cannot be completely avoided and/ or minimised.
- **Offset:** measures taken to compensate for any residual significant, adverse impacts that cannot be avoided, minimised and / or rehabilitated or restored, in order to achieve no net loss or a net gain of biodiversity. Offsets can take the form of positive management interventions such as restoration of degraded habitat, arrested degradation or averted risk, protecting areas where there is imminent or projected loss of biodiversity.

The after-use is considered to be part of the mitigation plan and is referred to in P&C Chapter 5.

³ http://bbop.forest-trends.org/pages/mitigation_hierarchy

5) Monitoring and communication

Changes and developments in the context of RPP-certification at a location, requires communication by the *company* (applicant or certified company) as stated below

- a. *Non-compliances or Shortcomings*: Inspection at location and assessment of information by the inspector, may result in shortcomings. These shortcomings are to be solved within the timeframe as defined by the inspector or RPP-Board. The *company* informs the inspector and secretariat.
- b. The effectiveness of *mitigation measures* is to be monitored. Plans are time-bounded and implemented as planned. When plans are not fulfilled within the planned timeframe, or in case of deviations or problems, the company shall communicate immediately with the secretariat.
- c. The company informs the secretariat –annually- of any changes in legality or governance with regard to a location (standard declaration).
- d. Prior to a re-inspection, normally every 5 years, the company informs the secretariat about the actual situation at the certified location. The information includes overview of the actual situation, possible deviations and the results of monitoring. The company shall also look forward to fulfillment of RPP requirements in subsequent years.
- e. At the end of the production-phase (=start of after-use phase), the company will inform the secretariat periodically on results of implementing the after-use. The progress in the fulfilment of the after-use plan will be published on the website of Responsibly Produced Peat (public accountability). The board is responsible for determining the situation in which the implementation of after use by the company can be considered completed.