



RISK INFORMATION
ALLIANCE

RIA Framework Consultation report

June 2026



Contributions

Org 1	Wood pellet producer
Org 2	Not-for-profit sustainability organization
Org 3	Cotton sustainability program
Org 4	Danish multi-stakeholder platform
Org 5	Timber certification scheme – national office

Feedback received

Comments		Formal response RIA
GENERAL / CROSS-CUTTING FEEDBACK		
Org 2	Coverage in terms of countries for value added Sourcing decisions usually involve some comparison and ranking of risk from different sources. Whether we like it or not, decisions on avoiding reputation risk and increasing supply chain resilience will consider the option of excluding high risk supply chains. For downstream supply chain actors there will be choices between countries of origin. For a risk assessment of Indonesian rubber production to be really useful, there would need to be equivalent assessments of other major producing regions.	<i>Comment noted. RIA Members have the intention of growing the coverage of available risk assessments.</i>
Org 3	Absence of visual elements The document could benefit from some more visual elements, flow charts or practice examples to help users implement in real time.	It is not clear if the comment applies to the framework document or final assessment format (Excel), but RIA will strive to make content more visual and user-friendly.
Org 4	Flagging gap between human rights standard and local law in the overview Could be good in the country overview tab to add a section indicating where gaps exist between human rights standards and local law – as this changes the DD and remediation picture significantly.	Comment noted. The intention is to cover this at indicator level (e.g. ILO coverage specific indicators). We will strive to add relevant elements in the country overview as well.
Org 5	Better highlight data limitations	We will ensure that data limitations, in terms of available public sources for the assessment, are mentioned in the assessment overview. We will not

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	Clarity of data limitations (data gaps and limitations) to ensure readers understand the context and potential biases of the information.	necessarily add data limitation comments for each indicator as this would considerably impact user-friendliness of the content.
LIST OF INDICATORS <i>Is the coverage sufficient? Is the wording clear? Is the division in themes and criteria sensible?</i> <i>If you have a comment on a specific indicator, please refer to the indicator number.</i>		Document with comments
Org 1, org 2, org 4	Included in this document .	Comments are being taken into account.
RISK ASSESSMENT METHODOLOGY <i>Is the approach taken clear? Is it sufficiently robust and fit-for-purpose?</i> <i>If you have a comment on a specific section of the methodology, please indicate which section.</i>		Document with corrections
Org 1	Language inconsistency. “Low risk” used in sections 3.2 and 4 instead of negligible risk.	Corrected.
Org 2	Absence of risk grading There are no distinctions in terms of severity within the category of non-negligible risks. Risk assessment is most useful when it focusses attention to most critical issues to inform actions to avoid or mitigate. With so many risks in a single non-negligible category, it will be difficult for companies to isolate actionable conclusions.	Comment noted – this option will be examined for further iteration of the framework. Change would not be immediate as it requires further investigation and testing of adequation for RIA members sustainability systems.
Org 3	More granular risk categories I understand the rationale for Negligible risk or not defined for the scoping. However, I am questioning whether having non-negligible risk is useful enough for stakeholders to use - should the risk be more clearly defined into risk categories to help users understand the scale, scope and severity of risks better? This can help with prioritisation and uptake of risk reports. The current format doesn't necessarily allow easy understanding of this. Could the Risk outcomes also be tied to other	Idem.

Comments		Formal response RIA
	measures - such as scale of commodity in a sector, number of workers, worker types etc?	
Org 2	Absence of supply chain resilience topics Did not pick up any direct reference to risks to supply chain resilience, which industry actors will surely be concerned about, and may relate to physiological, pest and disease risks (which may be linked to climate change) or to socio-economic trends which might lead to a decline in human and natural resources dedicated to rubber production. Was it a deliberate choice to exclude such factors from this assessment?	This is deliberately out of scope, as the framework is targeting production practices impacts at land-use level. Broader topics are not directly relevant to the main use case for RIA assessments (within assurance systems). However, we will try to mention salient topics relevant to the sector resilience in the country overview.
Org 2	Absence of certain risks applying to producers themselves There is no distinction between types of risk: - To health, welfare and livelihood security of smallholder rubber producers themselves - To health & welfare of other household members in a rubber producing household - To health & welfare of paid employees working in rubber plantations - To public environmental goods and services - To legal compliance (which may overlap with any of the above) The rights holders and duty bearers, and therefore actions to mitigate are usually quite different in each case.	Some of this is out of scope, as the framework is targeting production practices impacts at land-use level. Broader topics are not directly relevant to the main use case for RIA assessments (within assurance systems). Paid employers working in rubber plantations are covered in terms of health and safety, labour rights, wages, etc.
Org 3	In some areas it only specifies forest workers - e.g 14.1 - 2b. I believe farm workers should be covered too?	Corrected.
Org 3	Scope clarity for agriculture It is not necessarily clear whether the scope covers agricultural farm owners (not all commodities refer to farms as plantations) - might be worth defining this.	Comment noted. Vocabulary issue: both farms and plantations are covered. This will be adjusted.
Org 3	Key informant vs stakeholder consultation I note that key informants are noted as stakeholder consultations - however, should some of these actors be considered as part of the risk assessment for key informant interviews. Sometimes perceptions of the rightsholders can be as useful as expert outreach.	We do not operate on strict definitions for contributors to the assessments as categories tend to overlap. During the content development, key informants, e.g. from the concerned producers' community, may be consulted just as well as more academic experts. We strive to have a diversity of contributors to better inform the assessment.

Comments		Formal response RIA
		During the consultation period, we use the term “stakeholder” in the broad sense of the term, as anyone who may have an opinion on the assessment content.
RISK SCREENING OUTCOMES <i>Feedback on the RIA risk screening approach and outcomes for the selection of available criteria / indicators. Is the approach clear? Is it sufficiently robust and fit-for-purpose?</i> <i>If you have a comment on a specific indicator risk screening outcome, please indicate which one.</i>		
Org 3	Further definitions The methodology could maybe benefit from more practical examples, especially with some of the points that are a bit more subjective. For example in the scoping methodology 2.2 a - regarding whether the organisations is credible and renowned.	Comment well noted. Examples from practical assessments may be further added to the methodology as we grow the number of available assessments to pull from.
SCOPING AND INDICATOR GUIDANCE <i>Feedback on the scoping and indicator guidance. Is it clear and fit-for-purpose? Do you have specific experience or cases that could be a useful addition to the guidance?</i> <i>If you have a comment on a specific indicator, please indicate which one.</i>		
Org 3	Further definitions The scoping guidance could maybe benefit from practical examples, for example what does determined and clearly stated look like - to what level should it be determined, how much detail is required?	It means that it should be clearly defined. Examples have been added to the scoping guidance section.
OUTPUT FORMAT <i>Feedback specific to the output format for risk data. Is the example format for rubber produced in Indonesia clear and practical? Do you have suggestions on other formats that would improve usability and uptake?</i>		
Org 3	Information overload I think for indicators overview section this could be improved - I personally find it a lot of text to look at and it's hard to look for key areas you are interested in for	Comment well noted. We will strive to alleviate the text while maintaining accuracy and precision.

Comments		Formal response RIA
	example. Perhaps the different categories could be more clearly marked, to give better differentiation between each thematic are.	
Org 3	Use of colors It should be exemplified why each criterion has a different shade, depending on how many indicators are met as it's not clear this is for a reason initially. Perhaps instead a uniform shade could be used for the text and another box could be added with a colour and saying, met partially met, not met for example. As the red shade isn't the easiest to read the indicators and I find all the text kind of blends for me.	Comment well noted. We will strive to visually alleviate the text.
Org 4	Intro tab - excel Would be very useful with an intro tab in the excel: How to use this tool. Very complex to navigate.	Noted and we will include going forward.
Org 4	Explainer page - PowerBI The power BI tool is definitely more digestible but it would be good to have an explainer page: how to use, when to start, how to use the results etc.	Noted and we will include going forward.
Org 5	Improvement of the dashboard Suggestions for improving the visualization of the RIA system (dashboard): - Add color indicators for risk levels (Low–Medium–High). - A filter feature per province is crucial, given the diverse context of rubber in Indonesia.	Noted and we will strive to improve the readability of the dashboard and outputs. However, a filter per province would not systematically be available. While we do strive to provide the highest level of accuracy when there are sub-national differences, implementing filter features involved a considerable amount of resources that are not always available.



RISK INFORMATION
ALLIANCE

The **Risk Information Alliance (RIA)** is a collaboration of organisations working together to address the growing complexity of corporate due diligence and responsible business practices. By pooling resources, funding, and expertise, RIA facilitates the joint production of credible, high-quality, and up-to-date risk data across commodities, sectors, and geographies.

Through the development of a shared methodology, indicators, and a blueprint for a risk data storage platform, RIA enables its members to share and access risk data efficiently and cost-effectively. This collaboration supports better-informed sourcing decisions, stronger sustainability investments, and more consistent due diligence outcomes.

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