

STANDARD FOR THE CERTIFICATION AND REGISTRATION OF BIODIVERSITY CONSERVATION INITIATIVES. Nature-Based Solutions for Quantifying Net Gains.

Process: Standard public consultation
Version: 11/05/2021

The Standard for the certification and registration of biodiversity conservation initiatives is designed to certify and register initiatives that contribute to the preservation and restoration of ecosystems, ensuring compliance with national and international policies related to biodiversity and sustainable use, without neglecting ecosystem services.

The document was published on the ProClima website (www.proclima.net.co) on May 11, 2021, for comments from interested parties with a deadline of June 23, 2021.

Additionally, it was sent by email to interested parties (on May 14, 2021), including all the organizations with which ProClima has an alliance or has some participation, such as IETA (<https://www.ieta.org/Sys/Login?ReturnUrl=%2fLAC-Regional-News-Developments%2f10520727>), the FAO Mountain Partnership (<http://www.fao.org/mountain-partnership/news/news-detail/en/c/1403527/>), Fedemaderas, and Asocarbono. Below is the information on the recipients of the communication sent.

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During the public consultation period, comments and suggestions were received from the National Federation of Coffee Growers of Colombia and Alvaro Vallejo.


As a result of the public consultation process, version 1.0 of the document is presented. Annex A (below) presents the observations, comments or suggestions, and clarifications or adjustments resulting from the process.

ANNEX A. Public consultation Biodiversity Standard

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N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
	Title	<p>Nature-Based Solutions (NBS) is a concept and standard developed since 2012 by the International Union for Conservation of Nature (IUCN). The Proclima standard appropriates the term but does not follow the guidelines of the IUCN standard itself. I consider the use of the concept, especially in the title of the standard, to be inappropriate, both from the point of view of the authorship of the concept and because the subtitle creates confusion that the Proclima standard is oriented towards biodiversity, but not towards verifying, designing and scaling Nature-based Solutions, as the original IUCN standard does. For an initiative to be considered a "Nature-based Solution," it must meet the eight criteria set out in the NbS Standard. This subheading must either be removed from your standard or be approved by IUCN, explain its context and scope, and make appropriate clarifications.</p>	<p>Although the concept has been defined by IUCN, we believe it is inappropriate to state that ProClima "appropriates" the term. They are terms that correspond to general concepts and are used in different scenarios and by many organizations related to the subject. For example, in the definition contained in Annex A of the document under consultation (ProClima, South Pole. 2021), the IUCN definition is precisely related and refers to the source from which the definition was taken (always respecting copyrights and intellectual property):</p> <p>"The International Union for Conservation of Nature (IUCN) defines nature-based solutions as "actions to protect, sustainably manage, and restore natural or modified ecosystems that effectively and adaptively address societal challenges while simultaneously providing benefits for human well-being and biodiversity." (³⁴ https://blogs.iadb.org/sostenibilidad/es/que-son-las-soluciones-basadas-en-la-naturaleza-y-por-que-son-importantes/)</p> <p>On its website, IUCN itself states the following:</p> <p>"Nature-Based Solutions (NBS) is a new concept that encompasses all actions that rely on ecosystems and the services they provide to respond to various societal challenges such as climate change, food security or disaster risk." (https://www.iucn.org/node/28778).</p> <p>World Wildlife (WWF) also refers to Nature-based Solutions, presents definitions, and sets out some NbSs that serve as examples for taking actions to help us address the climate crisis (https://www.worldwildlife.org/descubre-wwf/historias/en-que-consisten-las-soluciones-basadas-en-la-naturaleza-y-como-pueden-ayudarnos-a-enfrentar-la-crisis-climatica):</p> <p>"Nature-based solutions refer to a set of actions or policies that harness the power of nature to address some of our most pressing societal challenges, such as the threat to water availability, the increasing risk of natural disasters, or climate change."</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
			<p>Now, it is clear that IUCN has prepared the "Global Standard for Nature-Based Solutions. A simple framework for verifying, designing and scaling up the use of NBS" (https://portals.iucn.org/library/sites/library/files/documents/2020-020-Es.pdf). It is pertinent to clarify that the IUCN standard does not correspond to a model that obliges those who use the term to comply with the standard or to "meet the eight criteria set out in the NbS standard". As can be seen in the section (of the IUCN standard document) entitled What is the Standard, the purpose of the Standard is found as follows:</p> <p><i>"Based on feedback from actual and potential NbS users, the Standard has been developed as an enabling tool, intentionally avoiding creating a rigid regulatory framework in which fixed and definitive thresholds are set on the outcomes that NbSs should achieve. Instead, the Standard is designed to help users apply, learn from, and continuously improve the effectiveness, sustainability, and adaptability of their interventions through NbS.</i></p> <p>The comment received explains the following: "the Proclima standard is oriented towards biodiversity, but not towards verifying, designing and scaling Nature-based Solutions". Precisely, it is worth confirming that, although the IUCN Standard contains a criterion related to biodiversity (Criterion 3: "BNS results in a net gain in terms of biodiversity and ecosystem integrity"), the ProClima standard includes among its objectives, the following: (b) define the requirements to be taken into account by holders of biodiversity conservation initiatives to implement plans, programs, projects, actions or activities that allow quantifying net biodiversity gains; (c) provide the criteria and requirements for quantifying net biodiversity gains, which clearly establishes different objectives between the IUCN Standard and the ProClima Standard.</p>
2	Page 6	Some figures from the IUCN Red List of Species are cited; however, the publication from which these figures are taken is not shown, and they differ from the official IUCN data indicated on its website.	<p>The text to which the comment refers is as follows:</p> <p>"In this regard, the IUCN Red List of Threatened Species notes that currently "of the 63,837 species assessed 19,817 are threatened with extinction, including 41% of amphibians, 33% of reef-building corals, 25% of mammals, 13% of birds and 30% of conifers."</p> <p>The quote is taken verbatim (hence the text in italics and enclosed in quotation marks) from the IUCN website. As stated in the link contained in Footnote # 3 of the document</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
			<p>(https://www.iucn.org/es/regiones/am%C3%A9rica-del-sur/nuestro-trabajo/pol%C3%ADticas-de-biodiversidad/lista-roja-de-uicn)</p>  <p>de-biodiversidad/lista-roja-de-uicn). Last accessed:19.07.2021 (Again). Home>Regiones >América del Sur> Nuestro Trabajo> Políticas de Biodiversidad.</p>
3		<p>The correct acronym in Spanish is UICN (in the text IUCN and UICN both appear). Since Spanish is one of the official languages of IUCN, it is not necessary to use or describe the English acronym at length.</p>	<p>Adjusted</p>
4		<p>It is not defined what criteria or classification should be used to identify the ecosystems present in the project area.</p>	<p>Section 3 (Scope) of the document under consultation states the following: This document constitutes the Standard for the certification and registration of biodiversity conservation initiatives. It provides the necessary set of principles and requirements for the certification and registration of biodiversity conservation initiatives, as for the quantification of Biodiversity Credits (hereinafter CoBs), ensuring that they comply with the conditions set out in this Standard.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
			<p>Issues related to temporal scope, eligibility conditions, criteria and indicators will be part of the methodological document (under construction) that will be put out for public consultation once the consultation of the standard document is completed.</p> <p>In this sense, it is essential to be clear about the scope of a document that provides the basic principles and requirements, and the scope of a methodological document.</p>
5	Page 16	It is not clear in what terms the activities described should contribute to biodiversity conservation. The "among others" leaves an open door for any commercial agricultural or forestry activity (including mechanized industrial monocultures) to be considered part of a conservation strategy and receive BdC.	Aspects related to the method required to carry out the identification and/or classification of ecosystems will be part of the methodological document.
6	In general, the standard requires improvement in several ways:	The standard states that BdC "is a measurable unit of biodiversity gain" but there is no unit of measurement beyond hectares directly linked to biodiversity to indicate the intensity of the impact, so it is an incomplete measure. For example, it could be possible that a project of a hundred hectares, to say any number, would have a much smaller impact than one of ten hectares. The absence of any kind of impact intensity indicator will result in compensation that is not proportional to the real impact of the projects and a tendency towards least effort. If the same principle were applied to climate change mitigation projects, a 10-hectare plantation of balsawood with 30% canopy cover would receive the same credits as a plantation of ebony (a species at least three times denser than balsawood) also of 10 hectares with 100% canopy cover.	<p>Section 9.7 (p.23)</p> <p>A useful tool for identifying, measuring and monitoring conservation objectives is the Theory of Change (TOC). This is the representation, through a logical sequence, of the conditions and factors necessary to achieve the expected impact. With variables that allow the connections between conservation measures and net biodiversity gains to be adequately represented, effects and outcomes can be quantified in the short term.</p> <p>The conservation initiative holder can use the FSC Guidance for Demonstration of Ecosystem Service Impacts. This guide includes the basic elements of a theory of change and a quality checklist for a theory of change.</p> <p>Section 9.9 (p.24)</p> <p>The holder of the biodiversity conservation initiative should describe the biodiversity conservation outcomes, considering appropriate variables and relevant valuation techniques, in the context of net biodiversity gains.</p> <p>It should present, in an orderly and appropriate manner, biodiversity conservation outcomes, obtained in line with eligible activities and conservation tools, drivers of biodiversity transformation and loss, risk management, and conservation targets.</p> <p>In doing so, it must demonstrate that nature-based solutions result in net gains in biodiversity and ecosystem services.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
			The quote on <i>Balso</i> and <i>Ebony</i> does not seem an adequate example to identify the intensity of an impact, even if it refers to GHG removals.
		There is nothing in the standard related to the minimum or maximum duration that a project must have, nor about crediting periods.	Program definitions on the duration of biodiversity conservation initiatives will be part of the methodology document.
		The BdCs also do not have a defined temporal scope; it is not specified for how long the action that generates the credits must last, nor is there any measure that guarantees the permanence of the actions carried out.	Within the scope of this standard, a " <i>temporal scope</i> " for the BdCs is not defined. Regarding the phrase " <i>it is not specified for how long the action that generates the credits should last</i> ", this is related to the duration of biodiversity conservation initiatives and will be handled in detail in the methodological document.
		It is not specified whether the same area can apply to BdC for different or complementary actions.	The comment is unclear.
		There are also no eligibility conditions so that a landowner can carry out destructive mining actions and then generate a biodiversity conservation project and obtain a BdC, constituting a perverse incentive.	Eligibility considerations will be part of the methodological document. Although it is worth noting that, in general, all processes that promote the development of "desirable" behaviors are prone to be linked to "perverse incentives" On the other hand, it should be emphasized that eligibility alone is neither the only nor sufficient condition for a project to be eligible for BdC.

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1	General	<p>FNC would first like to express our congratulations for the document presented, which is evidence of the effort and dedication that has gone into it.</p> <p>Our only approach has to do with the applicability that the process would have, understanding that it requires implementing actions to determine a baseline that is complex, extensive, and surely costly.</p> <p>It is understood the importance of previous studies and the reliability of the information to support the certification processes, but it is suggested to establish some scales of the depth of these studies depending on the area to be worked on or the type of project so that the indicators to be included in the previous studies are adjusted to those that will be used or are useful for the purposes pursued.</p> <p>Relative flexibility in these parameters will surely allow a greater number of initiatives to apply for these certification processes.</p> <p>In this regard, it is suggested that the document propose strategies for the participation of interested communities to reduce costs and, at the same time, achieve greater community ownership of existing biodiversity.</p> <p>The same observation and suggestion apply to the depth with which risk assessments should be made.</p> <p>Our purpose with these observations is to seek the greatest possible flexibility to reduce costs and allow a greater number of initiatives to be certified, without losing the rigor required to support the certification process.</p>	<p>The aspects that determine the elements mentioned in the commentary will be part of the methodological document.</p> <p>Some of the suggestions are taken into account, proposing a follow-up and monitoring model that meets the rigor required for this type of initiative without losing sight of the quality assurance and reliability of the standard.</p>