

CONSULTATION

Response Document



Measuring Nature-Positive

Setting and implementing verified, robust targets for species and ecosystems

18th February 2024

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 7,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- UN Decade on Ecosystem Restoration 2021-2030 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

This response was coordinated by Members of our [Country Policy Groups](#).

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy) at JasonReeves@cieem.net with any queries.

IUCN Consultation on Measuring Nature-Positive

Consultation statements

Unless otherwise stated, statements use a Likert scale (Strongly agree/Agree/Disagree/Strongly disagree/Don't know).

Understanding of Nature-Positive and IUCN's role

I have heard of the term 'Nature-Positive' before my engagement with this consultation on the IUCN approach (Yes/No).

Yes

I have a good understanding of what 'Nature-Positive' means.

Don't know

I use Nature-Positive to help frame and inform the work that I, or my organisation, undertakes.

Don't know

Guidance is needed to support society, including the private sector, in making contributions towards a Nature-Positive world.

Strongly agree

IUCN is well placed to provide guidance to its Membership on delivering and measuring conservation outcomes within a Nature-Positive framework.

Agree

IUCN is well placed to provide guidance to the private sector on delivering and measuring conservation outcomes within a Nature-Positive framework.

Disagree

I am interested in using the IUCN approach in my work for setting and implementing targets for species and ecosystems within a Nature-Positive framework.

Disagree

Do you have comments or additional points to make about your responses to any of the statements in this section?

The NPIP's definition of 'Nature-Positive' is a useful global signpost for nature recovery, but as a definition for companies, it is of limited use. We recognise the attempt made by the Nature Positive Initiative Partnership (NPIP) to establish a unified global definition of Nature-Positive amidst emerging terminologies. However, NPIP's definition alone is unsuitable for companies because it is too vague, and what

recovery of nature should look like is difficult to picture without local context. We therefore emphasise the importance of providing companies with a clear definition and straightforward guidance, to facilitate understanding and action that is meaningful to companies. Biodiversity Net Gain (BNG), mandatory in England since the 12th February 2024, is an example; it requires all new developments (unless exempt) under the Town and Country Planning Act 1990 to deliver at least 10% biodiversity net gain, whilst following the mitigation hierarchy. The value of habitats for biodiversity net gain will be measured using the statutory Biodiversity Metric is a biodiversity accounting tool. Further information, including a practical guide and case studies, can be found on the [CIEEM website](#).

The IUCN is well-positioned to coordinate existing initiatives and frameworks into an international effort to halt and reverse biodiversity loss. There has been a proliferation of initiatives aimed at delivering nature and biodiversity benefits, and we agree that there is a need for guidance to assist companies in selecting the most appropriate for their needs and contexts.

National initiatives that are tailored to local contexts and supported by robust legislation and policy have the best chance of success. Countries with such frameworks are likely to prioritise them over the IUCN's approach.

We suggest that the IUCN takes a leadership role in coordinating among its members and their initiatives in an international effort to align with the Kunming Montreal Global Biodiversity Framework (KMGBF) and Sustainable Development Goals (SDGs).

However, we recognise that the IUCN's approach may be most suitable for countries lacking existing initiatives for nature and biodiversity benefits, particularly those for which a species metric based on the Red List is most appropriate. The STAR metric has value as part of a comprehensive toolkit for measuring nature and biodiversity within these national initiatives.

To ensure widespread uptake by companies, the natural value of land holdings should be incorporated into existing regulatory frameworks governing companies, including auditing standards.

Inclusion of nature/biodiversity in auditing would also enable the implementation of a reverse tax system, whereby gains in natural and biodiversity value could be offset against other taxes, and losses could be taxed. This would provide companies with tangible benefits and incentives for enhancing the natural value of their land holdings.

We suggest that the IUCN engage with the International Auditing and Assurance Standards Board to explore the incorporation of biodiversity considerations into auditing practices; this should align with the IAASB stated aim of addressing emerging issues and topics of global relevance.

The IUCN approach: Positioning — relationship with other frameworks/initiatives

IUCN's approach, focusing on species and ecosystems, clearly fits within the broader Nature-Positive agenda.

Disagree

IUCN's approach builds on yet goes beyond the mitigation hierarchy.

Don't know

It is appropriate that IUCN's approach focuses on opportunities and risks; and does not incorporate support to metrics or targets for dependencies (e.g. ecosystem services, nature's contributions to people), which are well-covered elsewhere.

Strongly disagree

IUCN's approach supports the Science Based Targets Network (SBTN) framework (<https://sciencebasedtargetsnetwork.org/>).

Don't know

IUCN's approach supports the Taskforce on Nature-related Financial Disclosures (TNFD) framework (<https://tnfd.global/>).

Don't know

IUCN's approach supports private sector contributions towards meeting the goals of the Kunming-Montreal Global Biodiversity Framework, and Sustainable Development Goals (<https://sdgs.un.org/goals>).

Disagree

IUCN's approach gives adequate guidance to regulators about how they can facilitate company contributions to Nature-Positive.

Strongly disagree

Do you have comments or additional points to make about your responses to any of the statements in this section?

The focus on species is inappropriate for most companies, and very limiting. A metric that focuses on species is useful to have within a broader suite of metrics for evaluating nature-positive actions. However, a species metric is unsuitable for most companies, given that only a minority have land holdings of large enough size to directly impact species populations. Furthermore, addressing threats to species which spend only part of their lifecycle in that company's land holdings, such as migratory species, would be very difficult.

Where STAR does have potential is as a tool for states to plan and evaluate country-wide management actions aimed at reducing threats to populations of species within their jurisdiction. States, particularly those whose ownership of

species is enshrined in their constitutions, can act at the scale necessary to effectively mitigate threats to these species.

It is the IUCN's ambition to develop an ecosystem metric, but we believe this should have been the primary focus. The IUCN acknowledge in their document that the concept of 'nature' is broader than species and that it includes non-living components that are essential to the living, including water, soil, air, and associated ecosystem services. An approach which measures ecosystem health more broadly would encompass multiple benefits for nature, including species. We are concerned that introducing a metric for ecosystems at a later stage may strain the goodwill of proactive companies and complicate any management action plans which they already have in place.

In developing an ecosystem metric, the IUCN should consider existing natural capital and ecosystem frameworks. A [Natural Capital approach](#) is increasingly being adopted in a number of international and domestic regulatory contexts, and we were surprised by its absence in the IUCN's approach. Unlike the STAR metric, Natural Capital encompasses both living and non-living aspects of ecosystems, referring to these as 'stock', from which flow 'ecosystem services'. A lot of work to embed these in environmental accounting has already been [done in the UK](#) and [EU](#). The IUCN's Red List of Ecosystems could contribute data to a Natural Capital framework.

The IUCN approach: Aims

IUCN's approach will allow businesses and their investors to assess where they are on the journey towards making Nature-Positive contributions, and how to move forward.

Strongly disagree

IUCN's approach will allow businesses to quantify their negative and positive contributions on species and ecosystems.

Disagree

IUCN's approach will allow the aggregation of individual contributions to species and ecosystems to higher levels, such as by sector or country.

Disagree

IUCN's approach is a practical and iterative approach that will incentivise early action.

Strongly disagree

The IUCN approach allows IUCN members to understand how they can support the process of delivering Nature-Positive contributions, through their direct interventions and in support of company contributions.

Strongly disagree

The logic and presentation of the IUCN approach seems clear.

Strongly disagree

Do you have comments or additional points to make about your responses to any of the statements in this section?

It is not clear why an approach for companies to measure their contributions to Nature-Positive should focus on species. As discussed earlier, only a minority of companies have land holdings of large enough size to directly impact species populations.

Species are just one component of nature, and an approach to measuring natural value should encompass more of the features of biodiversity if it is to effectively contribute to Nature-Positive.

Furthermore, the approach measures threat to species only, and the effect of change in threat level on species is assumed, not measured, which undermines the robustness of the approach.

It is not clear why the approach need apply to all companies, and not just those with significant land holdings. The majority of natural/biodiversity gains are going to be made at the state level, with company contributions a relatively small addition to that. The IUCN's approach should therefore target companies with large land holdings, mainly those in the agriculture, forestry, and extractive industries.

It is not clear why an approach to measuring the Nature-Positive contributions of companies should not be integrated into existing auditing frameworks.

Incorporating some measure of the natural value of land holdings into auditing standards would make it mandatory for companies of a certain size and turnover to measure this annually. Company contribution to Nature-Positive should not be voluntary.

It is not clear where the incentive for companies to participate in the IUCN's approach comes from. Subsidies to induce corporate involvement are not appropriate as they have the potential to introduce perverse incentives.

The IUCN approach: Safeguards/high integrity

The key principles and guardrails set out are robust enough to prevent unintended consequences and ensure that businesses' contributions to Nature-Positive using IUCN's approach have high integrity at the site scale.

Strongly disagree

The IUCN approach is an appropriate compromise between simplicity, to encourage uptake, and robustness, to reduce greenwashing.

Strongly disagree

IUCN's approach is not an accounting/audit framework and should not be used to identify if a company is 'Nature-Positive'.

Disagree

The IUCN approach as presented is appropriately framed for use by Indigenous People and Local Communities (IPLCs).

Don't know

Do you have comments or additional points to make about your responses to any of the statements in this section?

Selection of a well-evidenced baseline is essential to the high integrity of any approach to measuring Nature-Positive. The IUCN should clarify that the 2020 'baseline' serves as a universal reference point, and that country-specific baselines should be no later than this. However, countries should use baselines that are appropriate to their contexts. For example, in the UK, a baseline prior to the introduction of organic pesticides in the 1960s might be necessary for 'full recovery of nature'. Countries might consider baselines that are already in use in other initiatives for which there is good justification. There is a risk that adhering to a baseline as recent as 2020 will undermine gains made prior to this.

Monitoring is essential for robust assessments and should be conducted by professional ecologists. Monitoring should be done at the very beginning and then as regularly as required (e.g. every one or two years). It should not be conducted by companies themselves as they lack the competence and would be a conflict of interests. Informally consulting experts at local institutions and NGOs, as the IUCN suggests, is not a substitute for standardised assessments conducted by professional ecologists.

The IUCN's approach does not appear to account for what happens to Nature-Positive gains if a company goes bankrupt. Unlike the purchase of equipment or materials, nature or biodiversity gains are not currently counted as assets and so cannot be safeguarded in the event of liquidation of a company. There is therefore a risk that any natural or biodiversity gains will be lost. Accounting for the natural capital value of land holdings in company audits would turn these into assets which could then be sold. Otherwise, some kind of legal covenant may be required to secure the future of any gains made.

The IUCN approach: Assessment framework (1/2): Pathway of delivery towards Nature-Positive contributions

The assessment framework is suitable for Category A companies to assess where they are on the pathway to making Nature-Positive contributions, i.e. along the alignment pathway. (Category A = companies where their environmental impacts are primarily site based, e.g. extractives, agriculture, infrastructure).

Disagree

The assessment framework is suitable for Category B companies to assess where they are on the pathway to making Nature-Positive contributions, i.e. along the alignment pathway. (Category B = companies where their environmental impacts are primarily embedded in value/supply chains linked to land holdings, e.g. clothing sector, retailers and wholesalers).

Strongly disagree

Which of the two proposed pathways (Sections 7.3.0 and 7.3.1 in the Nature Positive paper) for Category C companies are better suited to supporting finance companies on their journey to nature positive — select your preferred pathway:

A - Scoring system based on where a company is on the pathway towards Nature-Positive, or; B - The investment share approach that attributes STAR scores to products/industries. (*Cat. C = finance companies with portfolios that contain companies from categories A and B.*)

Do you have comments or additional points to make about your responses to any of the statements or questions in this section?

There are a number of reasons why the IUCN's assessment framework is not suitable for a majority of companies, chief among these being:

Only companies with significant land holdings, i.e. Category A, can undertake the management actions necessary for natural/biodiversity enhancement. Frameworks for categories B and C are therefore unnecessary.

The IUCN's approach does not integrate into the governance and auditing frameworks which control companies, and is therefore unlikely to be adopted voluntarily by them, particularly if implementing the approach costs them money.

The IUCN Approach: Assessment framework (2/2): Metrics to quantify contributions to species and ecosystems

The assessment framework metrics are suitable for companies to quantify Nature-Positive contributions at a site level.

Strongly disagree

The assessment framework metrics are suitable for companies to quantify Nature-Positive contributions along supply/value chains (i.e. for sectors or commodities at sub-national, national or regional level).

Strongly disagree

The Species Threat Abatement and Restoration (STAR) metric (built on the IUCN Red List of Threatened Species™) is an appropriate metric to allow companies to

screen sites, value chains, and investment portfolios for ongoing and existing impacts, and opportunities for making Nature-Positive contributions in relation to species extinction risk.

Strongly disagree

The proposal for the development of an ecosystem metric to measure Nature-Positive contributions is realistic.

Agree

Do you have comments or additional points to make about your responses to any of the statements or questions in this section?

From our perspective as an organisation of professional ecologists and environmental managers primarily based in the United Kingdom and the island of Ireland, the STAR metric, based as it is on the IUCN's Red List, is of limited utility.

The IUCN's Red List data is skewed towards tropical regions, making it unsuitable for assessments of UK-based companies. Compared with more relevant sources of local species data, using STAR in temperate regions may even have unintended consequences by giving a false impression that there are no threatened species in the area.

With the emergence of DNA-based methods of taxonomical classification, the taxonomy of species can change and so too the vulnerability classification of species in the Red List. This could have implications for any management action plan based on STAR.

The metric's resolution of 5x5 km is too low to be relevant to most projects undertaken by most companies. This resolution may be more relevant for the sort of large-scale projects undertaken by governments or inter-governmental organisations. Refinement to 1x1 km, a stated intention of the IUCN, would be an improvement.

STAR encompasses far too few groups of species — currently, terrestrial mammals, birds and amphibians — to enable significant contributions to nature/biodiversity. We note the IUCN's intention to encompass more groups and environments.

Despite these limitations, we recognise the value of the tool's utility for identifying the presence of Red List species in specific areas where there is high endemism and detailed local data are lacking.

The rapid development of new technologies for ecological monitoring — including acoustics, drones, and AI — could be transformative, making it more feasible to conduct monitoring at the scale required to meet global targets.

We also encourage the ongoing development of an index based on the IUCN's Green Status of Species for facilitating positive gains in biodiversity through recovery, but would like to see more detail on how it will be used.

We would like to see an ecosystem metric be developed, and consider that should have taken priority over development of a species-based metric for this approach to measuring the contributions of companies to Nature-Positive. In developing an ecosystem metric, the IUCN should consider existing natural capital and ecosystem frameworks.