



Improving Engagement of Civil Society Organisations (CSOs) in Sustainability Standards:

MAINSTREAMING BIODIVERSITY
INTO CERTIFICATION AND
LENDER SAFEGUARDS

IMPROVING ENGAGEMENT OF CIVIL SOCIETY ORGANISATIONS (CSOS) IN SUSTAINABILITY STANDARDS

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FRONT COVER:

Rice farming in Po Bung, Cambodia. Credit: Tim Bergman/FFI

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1. Introduction

STRUCTURE OF THE REPORT

With funding from the Cambridge Conservation Initiative, Fauna & Flora International (FFI), BirdLife International, Royal Society for the Protection of Birds (RSPB), University of Cambridge, Wildlife Conservation Society (WCS), Zoological Society of London (ZSL) and International Union for the Conservation of Nature (IUCN) worked to identify key leverage points and CSO needs in order to improve the engagement of Civil Society Organisations (CSO) in voluntary standards and safeguards.

The project leads interviewed a number of CCI Partners on their engagement with various standards, producing detailed case studies for 5 (4 certification standards and one financial safeguard), and conducted a literature review of key issues and barriers to engagement. In addition a workshop was organised for project partners and a wider set of organisations working on the development, governance and implementation of standards and financial safeguards to understand key engagement priorities and gaps.

The results are presented as the following sections:

- 1 Introduction**, the present section, introduces the need for the project, the partners, aims and a summary of key outcomes. It also summarises key benefits and concerns with voluntary sustainability standards (VSS) and safeguards and where CCI engagement could be most beneficial.
- 2 The role of voluntary standards and safeguards in conservation**, summarises a literature review on the impact of voluntary sustainability standards (VSS) and safeguards on conservation. It covers the challenges of measuring voluntary certification schemes and standards, it then attempts to summarise how effective standards and safeguards have been at securing measurable biodiversity and broader conservation outcomes. Finally, it explores some of the key tradeoffs and makes some recommendations to improve conservation outcomes through the application of VSS and safeguards.
- 3 Guidelines for CSOs wishing to engage in standards and safeguards** covers some basic strategies for engagement and common ways to engage including public consultations, standard development and governance. It also distils some common lessons from real examples of CSO engagement with standards-setting processes and covers lessons learnt, barriers and challenges and what worked well. Finally, it provides some general recommendations on where engagement efforts should be focussed for maximum impact, which could prove valuable to CSOs who are looking to engage either individually or as a collective.
- 4 What should a good standard cover with respect to biodiversity?** This final section explores what constitutes an effective safeguard or standard in terms of principles, criteria and evidence of compliance. It explore key elements of effective standards and safeguards, and based on these it makes recommendations for what a 'good' - effective, measurable, transparent – standard or safeguard should contain.

BACKGROUND

Voluntary sustainability standards (VSS) and safeguards are mechanisms that can be used to track and reduce corporate environmental and social impact, improve transparency and to promote best practice. Transforming the way we produce goods is a key target of many environmental conservation organisations and is reflected in global targets including SDG 12 and Aichi target 4. Standards present an opportunity to promote best practice to ensure sustainability principles are applied through good social and environmental governance. However, certification also comes with risks, including the high costs of certification; lack of harmonization among sustainability standards and safeguards; certification fatigue, duplicative audits and elusive results, and the potential for greenwash.

Civil Society Organisations (CSOs)¹ play an important role in the development, implementation and oversight of these standards and safeguards. They often play a role of stakeholder and advisor to the whole Standard and Safeguard process and this can be confusing for other stakeholders, as they don't always get consistent responses from these CSOs. For these reasons, the organisations involved in this project and a number of their collaborators felt a need to develop a guiding document for CSOs to engage with the development, governance and oversight of VSS and standards to ensure they were contributing measurably and consistently to biodiversity conservation.

This project focussed specifically on CSOs working on biodiversity and ecosystem services and was accordingly designed to try and address these issues through the following outputs:

- Guidelines for conservation organisations looking to engage in standards
- A teaching module for students and practitioners on how best to engage in standards
- A platform for conservation organisations to share experiences and jointly prioritise future effort
- Increased engagement of local and national CSOs in standard development

Multiple barriers exist to CSO engagement with voluntary standards and safeguards including the cost of engagement and the requirement for significant investment of resources. Currently, coordination between CSOs is limited, and often there is a lack of institutional knowledge within organisations. Within some standards and safeguards, there is limited space for CSO participation, and the type of feedback CSOs can provide is limited. Importantly, very few local CSOs engage with Standard Bodies.

The overall goals of the project were:

SHORT TERM: To achieve the long term goal through engagement of CSOs with the development and implementation of sustainability standards

LONG TERM: To reduce the environmental impact of natural resource-based production or extraction through the implementation of more impactful sustainability standards and safeguards

¹ Rather than CSO, we chose to use the broader term CSO [following the OECD definition](#) "[CSOs] can be defined to include all non-market and non-state organizations outside of the family in which people organize themselves to pursue shared interests in the public domain. Examples include community-based organizations and village associations, environmental groups, women's rights groups, farmers' associations, faith-based organizations, labour unions, co-operatives, professional associations, chambers of commerce, independent research institutes and the not-for-profit media."

Currently, there are over 400 standards in use and many of these originated in response to CSO pressure. The potential benefits of CSO engagement include:

- Contributing specialist sector knowledge
- Bringing perspectives on multi – stakeholder initiatives
- Granting legitimacy in place of governments.

An update provided by the Meridian Institute in 2018² Updated with 32 studies showed:

- Rainforest Alliance and RSPO do reduce deforestation in some places (but not all)
- FSC did reduce forest cover loss in some countries, but not all
- Forest degradation inconclusive
- Fisheries certification improved sustainable stocks, but had no impact on marine mammal bycatch
- Still challenged by data and lack of comparability

² <https://merid.org/case-study/supply-chain-sustainability-research-fund/>



DEFINITIONS

All standards are a type of safeguard, but not all safeguards are standards in that not all safeguards requirement certification or third party verification. Performance standards and requirements are a subset of environmental and social safeguards.

The project focussed on voluntary standards and safeguards, with the simple distinction that these are not country legislation, although their use may in some cases may be mandated. We specifically focussed on standards with the greatest potential to avoid and minimise harm to the environment through high-risk commodities such as palm oil, rubber, bauxite/aluminium. Notable exceptions were standards for sustainable production of soy and beef, as CCI members did not engage actively with these standards.

VOLUNTARY SUSTAINABILITY STANDARDS:

Voluntary Sustainability Standards (VSS) are market-based tools to address key social, economic and environmental issues in production and processing. They are developed to assure consumers, retailers, investors and other supply chain actors that the products they buy have been produced, traded and processed sustainably.

SAFEGUARDS:

Safeguarding policies are defined by the World Bank as instruments applied by the bank in its operations to protect the interest of the beneficiaries, clients, shareholders and the World Bank. Each safeguard must meet the following objectives:

- Do no harm – protect people and environment from adverse impacts
- Do good – enhance social equity and promote environmental sustainability
- Reduce and manage risk for the client and for the WB
- Respond to a worldwide constituency

Standards, which are the core component of a sustainability certification system such as the Round Table for Sustainable Palm Oil (RSPO), are typically a set of guiding principles and criteria, are owned and governed by a specific body with its own set of constituents and stakeholders who ensure that these principles remain robust and fit for purpose. In order to be certified against a particular standard and achieve regulatory compliance and/or access the benefits of certification, a proponent must typically go through third party assurance and verification to ensure that the process is unbiased.

Many lenders, such as the World Bank, have an obligation and duty to ensure that 'people and the environment are protected from adverse impacts'. In addition, a lender or investor's reputation can be damaged as a result of association with a borrower who has caused social and/or environmental damage. A key mechanism to ensure this is through safeguard policies, which address environmental and social issues throughout the lifecycle of projects and also provide a framework for consultation with communities and for public disclosure which borrowers are required to comply with as a condition of the loan.

Lender safeguards typically address the following principles:

- Avoid negative impacts where possible, otherwise minimize, reduce, mitigate, compensate
- Match level of review, mitigation and oversight to level of risk and impacts
- Inform public and enable people to participate in decisions which affect them
- Integrate environmental and social issues into project identification

³ <https://projects.worldbank.org/en/projects-operations/environmental-and-social-policies>

KEY FINDINGS

The total area covered by voluntary sustainability standards in the 8 most active sectors (banana, cotton, coffee, cocoa, tea, sugar, palm oil and soybean) reached 14.5 million hectares in 2014 which was less than 1% of the global agricultural area (Potts, Voora, Lynch, & Mammadova, 2017). In 2015, organic was the largest sustainability standard in terms of area and product variety, and more than 50.9 million hectares of agricultural production were certified as organic. This represents 1.1% of the agricultural land worldwide (Lernoud et al., 2015). RSPO has the second largest area of certification, of 0.07%, and the commodity experiencing the highest growth rate is cotton.

Overall, the total area certified of 12 major agricultural standards increased by 11% from 5.7 million hectares in 2000 to 15-25 million hectares in 2012 (Tayleur et al., 2017). There is rapid growth in certification, however the distribution of where certification occurs is limited; 133 countries had certified cropland, and 31 countries classified as low income countries by the World Bank have little certification coverage.

In terms of safeguards, a number of lending banks such as the Asian Development Bank, African Development Bank, Inter-American Development Bank, and European Bank for Reconstruction and Development have their own requirements. There is significant variation in the safeguard policies of these Multi-Lateral Development Banks (MDBs), for example an independent review in 2015⁴ revealed differing scopes for central themes such as the 'Area of Influence' of a development, which defines a company's responsibilities. Increasingly however, the International Financial Corporation's Performance Standard 6 (IFC PS6) represents international best practice for BES management.

Projects seeking finance from the IFC (which finances development totalling in the region of US\$19 billion per year) must adhere to best practice. In addition, 96 other financial institutions (jointly lending approximately US\$250 billion per year), have broadly aligned their own BES standards with IFC PS6, through the adoption of the Equator Principles which govern approximately 80% of the global project finance market. This is a significant opportunity for CSOs to engage and influence a number of lenders through consultative processes around the IFC Performance Standards. Specific evidence on the relative efficacy of safeguards and oversight by MDBs, particularly metastudies, are limited and data exist on both sides of the argument. A central issue raised is that the short-term interest of MDBs and other lenders in the actual completion of the projects they lend to undermines the credibility of any threats to withdraw funding in the event of non-compliance (Saro, 2012). The same study also concludes that while lenders are relatively effective standard setters and are best placed to monitor compliance, they are not well-placed and lack capacity to enforce safeguards.

⁴ https://consultations.worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/related/mdb_safeguard_comparison_main_report_and_annexes_may_2015.pdf



CCI WORKSHOP OUTCOMES

At a workshop organised by FFI for a broad group of organisations working on standard and safeguards engagement, representatives from FFI, BirdLife International, IUCN, ISEAL Alliance, the Cambridge Conservation Initiative, TRAFFIC, worked to answer the following questions:

1. Review principles and criteria of a standard financial safeguard or certification standard, put the different principles in order of importance for conservation
2. How well we, as CSOs, consider each one when inputting to standards – rate these on a scale of 1 to 3 (3 being best)
3. Look at the gaps – where we need to focus more efforts, or have clearer guidance for people so they know where and how to engage, rate these on a scale of Low (L), Medium (M) or High (H) to indicate where biodiversity-focussed CSOs must focus more attention.
4. For each principle, note down any key criteria and/or indicators that will support and allow principles to be verified

Two example outcomes are presented below, one for a financial safeguard (the World Bank Environmental and Social Safeguards) and the RSPO Standard.

WORLD BANK ESS

Order of priority for biodiversity-focussed CSOs (Higher to lower) Need more focus	How well do we consider each of these when inputting	Gaps	Key criteria / indicators
ESS1: assessment and management of environmental and social risks and impacts	2	M	IBAT, SEAs, CIAs, temporal, CC-nature links, materiality assessment
ESS6: Biodiversity conservation and sustainable management of living natural resources	3	L	MH, KBAs, (AZES HBAs), PAs / Ramsar, IBAT, critical habitat, no go areas
ESS3: Resource efficiency and pollution prevention and management	0	H	Polluter pays, C tax, internalising externalities, circular economy
ESS10: Stakeholder engagement and information disclosure	0.5	H	FPIC, multi-stakeholder consultations,
ESS5: Land acquisition, restrictions on land use and involuntary resettlement	0	H	human rights, ES, vulnerable, poor, marginalised, land access, rights, stewardship
ESS7: indigenous peoples / sub-Saharan African historically underserved traditional local communities	0.5	H	UNDRIP, as above
ESS8: Cultural heritage	1	M	World Heritage
ESS4: Community health and safety	0	L	FPIC, right of redress, grievance mechanisms
ESS9: Financial intermediaries	0	L	Supply chains, legality, chain of custody, environmental risk, climate nature links
ESS2: Labour and working conditions	0	L	Poverty benefits.

Major discussion points in World Bank group:

- Root problems – the idea of people in poverty are concentrated on food before they can even consider biodiversity
- Need to sort the local issues involving poverty reduction
- Access to resources / rights / health are the priorities of the locals but these ESS values were put as low in the rankings
- Beyond to engage local stakeholders but need to put ourselves in their shoes in order to know how to approach

RSPO PRINCIPLES AND CRITERIA

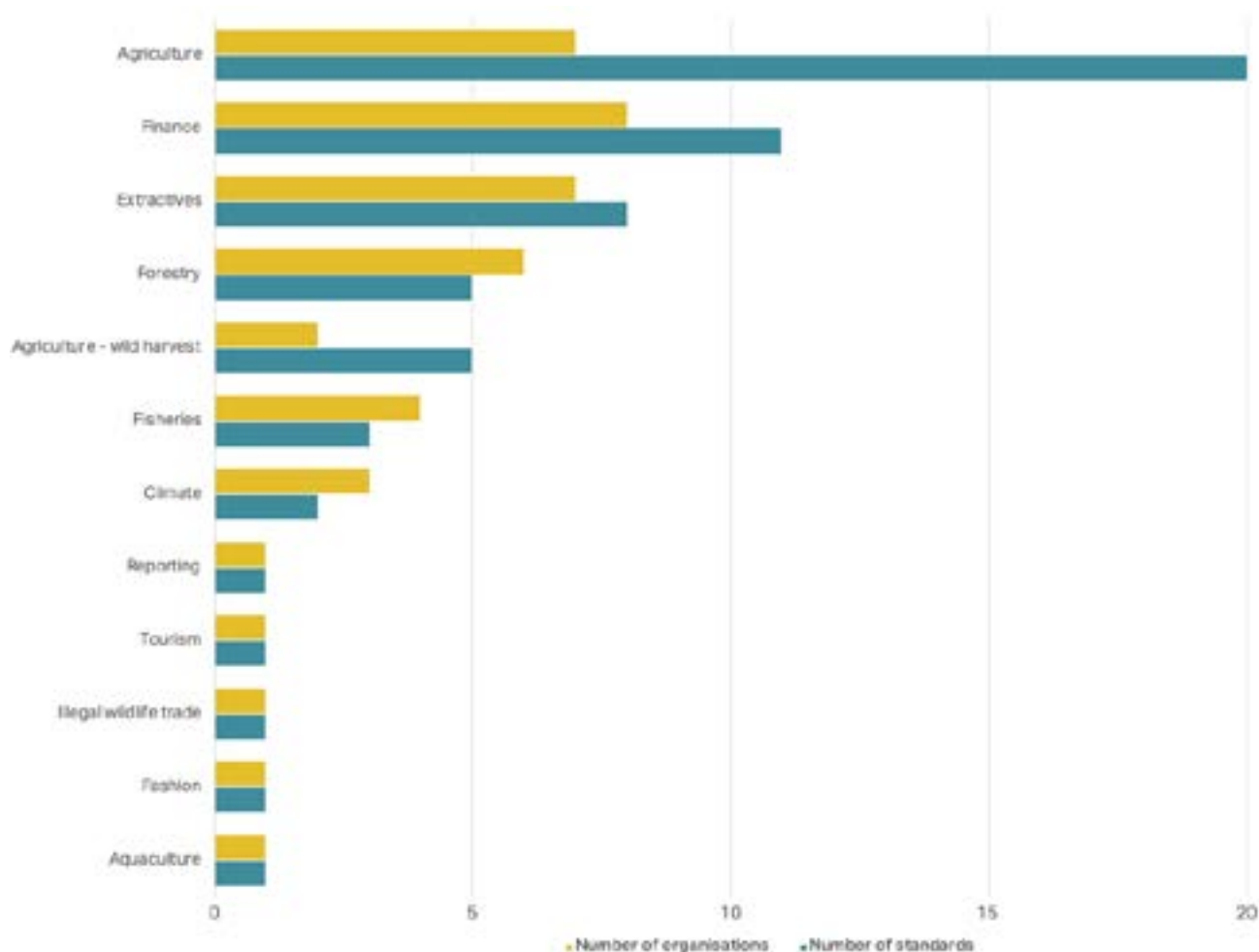
Order of priority for biodiversity-focussed CSOs (Higher to lower)	How well do we consider each of these when inputting
Need more focus	
Principle 7: protect, conserve and enhance ecosystems and the environment	3
Principle 5: support smallholder inclusion	Agri – 2 Other -1
Principle 1: behave ethically and transparently	2
Principle 3: Optimise productivity, efficiency, positive impacts and resilience	1
Principle 4: respect community and human rights and deliver benefits	1
Principle 2: Operate legally and respect rights	1
Principle 6: Respect workers' rights and conditions	1

Major discussion points in World Bank group:

- Rights and legality – CSOs regularly depend on larger mission driven organisations to pick this up such as Green Peace, Human Rights watch
- Indicators include: questions and processes to identify 'no go', mitigation hierarchy, avoidance to be taken seriously, impacts of individual actions.
- The RSPO standard has just been revised, and so won't be changed again for another 4 years - therefore we should focus on implementation of the existing standard
- Funding to support local NGO voices within RSPO would be really useful
- Increasing support for smallholders would be useful, there is a new RSPO standard coming out this year to help with this
- Increasing demand for sustainable palm oil is needed

CCI ENGAGEMENT ON VSS AND SAFEGUARDS

A review of the seven project organisations within CCI revealed that they engage regularly and significantly⁵ with at least 22 voluntary sustainability standards and 4 lending institutions.



Identified gaps in CCI's engagement with VSS and safeguards:

1. Knowledge gap and lack of data on implementation and impact of standards
2. How do standards interact with regulations; at which point standards become regulations?
3. Need to better identify research and practice gaps
4. Building on previous CCI work on spatial mapping and increased transparency and standardising the collection of biodiversity data for certification to measure its effectiveness
5. Where standards fit within biodiversity conservation strategies
6. Prioritising engagement with safeguards and standards
7. Governance gaps of certification schemes in terms of environmental CSOs representatives

⁵ 'Significantly' in this case meant at the level of developing new standards, as part of governance structure and to a lesser extent structured and combined responses to public consultations.

2. The role of VSS and safeguards

A rapid literature review was conducted of existing papers and reviews that have looked at the impact of standards and safeguards in conservation. It is not an exhaustive list of available literature, but aimed at summarising some of the key information available. The examples given in this briefing are biased towards the agriculture sector and voluntary standards versus other sectors and safeguards. This is a reflection of the current status of reviews. The reviews also focus on the challenge of measuring the effectiveness of standards as opposed to presenting a clear body of evidence on their impact on conservation.

EVIDENCE OF A POSITIVE INFLUENCE ON BIODIVERSITY

There is evidence to suggest that standards are effective at biodiversity conservation, particularly when they are used in certain situations. For example one review that assessed the effectiveness of a suite of standards and voluntary measures suggested that they are effective when they have clear targets and reporting requirements, and monitoring and evaluation by a third party (McCarthy and Morling, 2015). Using VSS alongside policy instruments or as an interim for policy development is recommended as one potential way to deliver effective biodiversity conservation. For example the development of a mandatory national palm oil standards in Indonesia, and shortly in Malaysia, that complement RSPO certification.

International Institute for Sustainable Development (IISD) conducted a review examining how aligned agricultural VSS were to specific biodiversity indicators developed by a multi-stakeholder group with the CBD. One of the main conclusions from this work was that the VSS reviewed had a clear focus on habitat conservation, with 87% of standards prohibiting production on land recently converted from forests. Habitat loss is the biggest driver of biodiversity loss, and so the fact that VSS are aiming to address this is positive for biodiversity (Potts et al, 2017). The review also examined certification around 8 global agricultural commodities looking at whether the standards are addressing the main environmental issues associated with growing each crop, summarized in the table below. Overall, the criteria of certification schemes are aiming to address the key threats to biodiversity associated with production and land clearance.

FORESTRY:

Certification for forestry has led to positive changes in practices around high conservation value areas, but it is less clear what impact on deforestation there has been at the landscape level (Auld et al, 2008). FSC certified forests in Estonia had better tree diversity and ecosystem function than uncertified forests. However there was still a lack of very large trees in certified forests (Lohmus et al, 2010). A more recent study on the impacts of biodiversity conservation from forestry certification showed that FSC and PEFC produced environmental benefits compared to non-certified conventionally logged forests, although the review stated it was difficult to draw generalised conclusions due to most research being very site specific and involving different field protocols. They did find that FSC had a positive impact for fauna, flora and ecosystem services over boreal, temperate and tropical ecosystems (Di Dirollami and Arts, 2018).

PALM OIL:

One study comparing certified and non-certified palm oil plantations showed that RSPO certification was associated with a lower deforestation rate by 33%. However they also found that certification had no causal impact on forest loss in peatlands (Carlson et al, 2018).

FISHERIES:

A study from MSC in 2016 compared Northern and European certified fish stocks. They found that the median biomass had increased since 2000 in certified stocks compared to non-certified, and that the certified stocks were less intensely fished (MSC, 2016). Another study analysed 45 certified and 179 uncertified stocks using data from a global assessment database. They found that 74% of certified stocks were above the sustainable target biomass levels, compared with 44% of noncertified stocks (Valencia et al, 2012). However one study looking at marine bycatch compared 49 MSC certified and 56 noncertified US fisheries and found no difference with respect to the level of marine mammal mortality (Selden et al, 2016). The reason suggested is that the Marine Mammals Protection Act requires US fisheries to reduce the level of bycatch. This example highlights how certification can interact with government policy. The same study also found that MSC certified fisheries used gear that had lower impacts on the environment.

CROPS:

Previous meta- analysis of the impact of organic agriculture demonstrated that organic farming increased species richness, having on average 30% higher species richness than conventional farming systems. However 16% of studies in the analysis showed organic agriculture having a negative impact on species richness, suggesting that even though the impact is generally positive, it will differ between organism groups and landscapes (Bengtsson et al, 2005). In El Salvador it was found that RA certified coffee plantations were not more bird friendly than other randomly selected non certified coffee farms where we might have expected they would be. The criteria of RA certification included protection of small forest fragments through conservation set asides, that were very important for forest specialist bird species (Komar, 2018).

SYSTEMIC IMPACTS

In addition to direct benefits of VSS, new thinking is suggesting that there are indirect benefits of standards that might go wider than the standards themselves working in isolation. These have been named systemic impacts (Aidenvironment, 2018) 36. Systemic impacts of standards might include:

- Aiding capacity building of other businesses and governments,
- Providing demonstration sites to show the value for participation and provide examples of success
- Improve the credibility of standards
- Support coalition building and infrastructure development.

These wider impacts are hard to quantify and measure, although they may contribute to enabling factors that lead to standards and certification effectively conserving biodiversity.

WHAT ARE SOME OF THE CRITICISMS OF VSS?

There is 'reasonable evidence to suggest significant though not universal positive changes in near – term ecological, social, and economic well-being resulting from standards – compliant practices, although literature clearly attributing large-scale sustainability impacts to standards and certification systems is rare'. (SASC, 2012)

AMBITION	1. Of the schemes reviewed by one metastudy which assessed 161 voluntary approached to conservation, 78% performed poorly for target ambition - the stringency of the targets relative to the policy objective (McCarthy et al, 2015). 2. In a separate review of 12 agricultural sustainability standards, it was found that only 2 prohibited deforestation completely, and there was a high level of variation in standards for their impact on conservation (Tayleur et al, 2017) 3. MSC certification allows the use of destructive fishing methods such as bottom trawling gear, and tolerates shark fishing (Jacob et al, 2017).
ADDITIONALITY	1. The literature suggests that VSS target producers that are already more conservation friendly for certification (Komives et al, 2018); 2. A study looking at whether Rainforest Alliance certification improves biodiversity in coffee farms in Brazil suggested that farms were already better at conservation measures before they became certified (Hardt et al, 2015); 3. Whether certification leads to a positive influence on biodiversity when, for example in this case, farms were already carrying out conservation measures (Garrett et al, 2016).
TARGET ACHIEVEMENT	1. Of the schemes reviewed by one study, 64% performed poorly for target achievement - the extent to which voluntary targets are realised (McCarthy et al, ibid) 2. Firstly, there is concern that overfishing is occurring in MSC certified stocks. This paper suggested that 31% of MSC stocks were overfished, 16% of stocks are overfished and 27% are depleted (Christian et al, 2013).
ALIGNMENT	Differences exist for measures and language adopted to safeguard biodiversity components between different standards (Russillo et al, 2018)
UPTAKE	1. 57% of schemes performing poorly in relation to level of uptake, indicating that sustainability awareness and market access are an important factors for the effectiveness of standards (Mori et al, 2016). 2. Round Table for Sustainable Palm Oil (RSPO) is the largest palm oil certification scheme certifying 3.95 million Hectares worldwide, only half of its global production is sold as certified palm oil due to the insufficient demand for sustainable palm oil.
STAKEHOLDER PARTICIPATION	VSS do not fulfil stakeholders' expectations about whether their outcomes actually result in sustainability improvements and/or stop harmful practices (Komives and Jackson, 2014; Marin-Burgos, 2015)
MONITORING	VSS do not clearly articulate the objectives of the scheme as well-measurable indicators of success (Blackman and Rivera, 2011)

Summarising the results of several studies, VSS do not appear to be effective at biodiversity conservation when there is low sector coverage, low target achievement within the standard and poor target ambition; VSS alone will not be enough to tackle the most pressing social and environmental challenges (McCarthy and Morling, 2015; Blackman and Rivera, 2011; Mori et al, 2016). A review looking at how effective standards for textiles, palm oil and fisheries have been at addressing biodiversity issues concluded that there is a clear environmental crisis in these sectors, and even if standards were made more robust they would not address the environmental problems (CMF, 2018).

CERTIFYING METHODS OVER IMPACT

TRADE-OFFS AND UNINTENDED CONSEQUENCES

In a number of situations there may be trade-offs and unintended consequences of VSS, such as leakage; improving conservation on a particular farm may displace harmful behaviour to an adjacent landscape. In India for example, demand for organic fertiliser has resulted in increased livestock numbers and grazing impacts in protected forests (Madhusudhan, 2005). A study examining whether there were trade-offs for smallholder palm oil farmers between socioeconomic and environmental benefits was inconclusive but indicated whilst there were socioeconomic benefits, the environmental benefits were localised rather than at the landscape level (Brandi et al, 2017).

LACK OF MARKET DEMAND

One study examined whether VSS for soy, palm oil and cocoa have led to a decrease in the rate of overall deforestation and wider land use change. There has been an increase in the amount of land certified, but FAO data suggests that there has been no change in the rates of deforestation in the countries of study (Indonesia, Cote D'Ivoire and Brazil). The main reason for this was a lack of market uptake for certified products compared to overall demand for these commodities, and to a lesser extent loopholes in the content and enforcement of the criteria within standards (van der Ven et al, 2018).

OVER SUPPLY OF STANDARDS

With now over 400 standards available, duplication and overlap are a concern and can create confusion in the market. There is also a shift to company-owned schemes that are developed internally and not third party audited, decreasing the transparency of the process and further increasing the confusion around certification schemes (Mori et al, 2016). The very nature of the voluntary standards and safeguards also means that companies who have the greatest impact to biodiversity can choose to opt out of any VSS. There is a need to have a more holistic approach to production with higher transparency across the whole supply chain (CMF, 2018).

STANDARD DESIGN AND GOVERNANCE

The design of the standard itself and the actors involved can play an important role on the effectiveness for biodiversity conservation. Weak monitoring and enforcement mechanisms, inadequate membership and participation rules and ineffective complaints procedures can also lead to standards not being very effective (CMF, 2018). For example, FOTS has been criticised for having poor third party auditing processes, and MSC reporting has been criticised as poor with a lack of data; anecdotal evidence also exist that auditors were not meeting fishermen or examining fishing gear. Poor CSO representation or lack of appropriate technical competencies for the issues relevant to the operational contexts is another significant issue.

SITE AND LANDSCAPE LEVEL

At the site level, the evidence is mixed for whether VSS have a positive impact on biodiversity. There is some evidence to suggest that VSS do have a positive impact although it can depend on what is measured and the location. While there might be positive improvements to particular components of biodiversity might be seen, at the same site other components of biodiversity might not show positive impact to biodiversity. Some examples to highlight this are below. In studies that have shown that VSS have a positive influence on biodiversity and ecosystem services, there is still limited understanding of how or why things worked well, and therefore how to replicate the successes in other areas (Komives et al, 2018).

COMMODITY	MAIN CONCLUSION
BANANAS	Most banana production globally is for local consumption, and only a fraction of production of bananas is traded internationally. This means that certification is likely to be limited to the fraction of global production that is traded internationally. This review estimates that over 65% of globally traded bananas are currently certified. This suggests Northern - driven demand for certified bananas may be near to saturation.
COCOA	Cocoa yields around the world often suffers from low yields particularly in Africa; the major reason for this is thought to be low soil fertility and production practices that deplete soil nutrients. Shifting to full sun cocoa is exacerbating the problem. Cocoa standards are one way that soil management could be improved. In 2014 most certification of cocoa was in Africa, therefore geographically cocoa standards are well placed to target issues with soil fertility.
COFFEE	Coffee certification occurs in geographic areas where eutrophication is most prominent. Eutrophication is occurring from nitrogen run off from the switch from shaded systems to full sun plantations. Certification might be positioned to help reduce the runoff from coffee plantations through promoting shade grown coffee.
COTTON	Cotton production is a driver of water scarcity in several major production regions globally. The study found that cotton certification is under represented in areas where water use is the biggest problem; this reflects the observation that certification attracts those already performing well. Expansion of production into new countries represents an opportunity for certification, and is important for water management.
PALM OIL	Palm oil certification is occurring in areas where high deforestation is occurring. RSPO prevents the clearance of primary forest, and the principles and criteria and now looking to address clearance of secondary forest. However, lack of demand for certified palm oil in India and China which account for 40% of global demand might limit the impact of RSPO.
SOY	Soy certification was most active in areas of biodiversity vulnerability. However there are low adoption rates due to low demand for certified soy from the largest importer, China.
SUGARCANE	Sugarcane production is often associated with high rates of fertiliser use and water use, and therefore contributes to water pollution. Currently certification is mainly concentrated in Brazil, where there is a lower fertiliser use than other major producing countries.
TEA	Habitat conversion for tea production is a huge threat to biodiversity. Currently only 18% of tea production is certified, and only 13% of the global area of tea production is certified. There is a need to increase the proportion of tea that is certified.

MEASURING THE IMPACT OF VSS

Often, the impact of standards is measured through indirect evidence of whether or not a particular practice or criteria has been adopted rather than looking at the direct conservation gain (Tscharntke, 2015; SASC, 2012). This is partly due to the way that many principles and criteria are set up within the standard; monitoring is more around achieving outputs rather than monitoring the impact of those actions and their delivery on the ground (Potts et al, 2017). There is criticism in the literature that many VSS don't have specified targets or indicators that would contribute to performance assessment (McCarthy and Morling, 2015).

To summarise the challenges in measuring the impact of voluntary standards on biodiversity:

- The baseline data against which relative measurement of progress towards conservation outcomes are often inadequate or poorly conceived and therefore not fit for purpose.
- Ecosystems are themselves very complex and dynamic, and designing methods to monitor the impacts on them over time is difficult.
- Finding simple, achievable and, more challenging – agreeable - metrics that demonstrate successful management interventions is a common barrier
- The indicators and methods used within and across standards are constantly changing making it problematic to isolate which effect is being studied (ISEAL, 2017)
- As market based instruments, VSS are complex; they are not bound by a particular geography and can be linked to part or the whole supply chain
- To add to the complexity, many financial institutions, VSS's and businesses have varying definitions of sustainability, and different parts of sustainability are important to different supply chain actors (ISEAL, 2017) and their stakeholders. Often, the loudest voice is heard.
- There are a limited number of large scale studies that compare the impact of a standard or certification to a counterfactual; a situation where no standard is present (Rivera et al, 2010).
- Many sustainability standards are relatively new and evaluating impact takes time
- Demand for evidence on standards effectiveness has been relatively low until recently.

Although the number of studies has increased in the past five years, many researchers still feel there are significant gaps in knowledge for assessing the impact of standards in conservation.

BOX 1. WHAT ARE THE GAPS IN THE LITERATURE AROUND VSS?

1. Research on a greater variety of commodities standards is needed

Most of the existing literature focuses on a small number of standards, and there are clear gaps where some standards have much less information available about their impact, including newer standards. It might be helpful to focus on studies that examine multiple VSS going forwards.

2. A greater range of geographies is needed

There is a bias in the existing literature to a focus on Latin America, further evidence on biodiversity impact from other countries is needed.

3. Replication of studies is needed so that businesses and stakeholders can be more confident in the strength of the results

There are not many studies by different authors looking at the same outcomes using methods. Replicating studies would help to raise confidence in the results.

4. More research is needed on all aspects of biodiversity

In the last 5 years there has been an increase in the number of standards looking at deforestation and biodiversity, but further work is needed on topics such as ecosystem services and HCV assessments. In addition more data is needed on forest degradation; although deforestation is well assessed, forest quality is not.

(Adapted from Komives et al, 2018)

IMPACT OF FINANCIAL SAFEGUARDS

Financial safeguards that govern project lending from a range of financial institutions are increasingly recognising the topic of environment and managing environmental and social risks through safeguards. There are still a number of concerns with how IFIs address biodiversity. Fauna & Flora International conducted a review of five multi-lateral financial institutions (MFIs) and the review recommends improvements are needed to develop an integrated ecosystem approach and drawing on knowledge, experience and expertise of a broad range of species and ecosystem specialists (Howard and Jenner, 2016). Some of the conclusions included that MFIs paid attention to biodiversity and ecosystem services, but the capacity within MFIs was often lacking to both understand and implement biodiversity and ecosystem service baselines, and MFIs often rely on external expertise leading to inconsistencies in how biodiversity and ecosystem services are addressed within the financial safeguards.

Another study which looked specifically at the World Bank, a multi-lateral development bank (MDB), examined local impacts on Important Bird and Biodiversity Areas (IBAs) using tree cover change data. It found that there were no measurable negative changes in terms of tree cover loss or biodiversity outcomes within IBAs close to sites of World Bank projects (Buchanan et al, 2018). It is important however to remember that the study did not consider all aspects of biodiversity and only a limited sample of IBAs was included because of a lack of locational information.

As with VSS, implementation of safeguards was found to vary, with one study finding that only 2 of 11 rural transport projects reviewed, funded by the World Bank, applied their Natural Habitats policy (Worden and Rees, 2011). Other studies found that the scope and ambition of lending policies is uneven across financial institutions is uneven, and considerable scope exists for increased harmonisation of environmental and social lending policies in international banking (Himberg, 2015; Howard and Jenner, 2016; Wright, 2012).

A review considering the Equator Principles specifically, reveal that the framework has not limited lending to projects with significant environmental and social costs. It also notes that although the framework has improved relations between financial institutions and stakeholders, a lack of transparency continues to undermine external accountability (Wright, 2012).

The bulk of multilateral lending till date has been provided by institutions created and ruled by the west, however, two new institutions, the Asian Infrastructure Investment Bank (AIIB) and the New Development Bank (NDB) have recently been established. Led by China and Brazil, Russia, India, China and South Africa (BRICS), they have now raised enough co-financing to rival established MDBs in terms of annual lending. Several stakeholders, including the US Treasury Department, have concluded that these new banks would fail to meet environmental standards, procurement requirements and other safeguards adopted by the World Bank and the ADB (Perlez, 2014).

In addition, there are also concerns that the establishment of these alternate sources of development finance may weaken the enforcement mechanisms of existing MDBs, by undermining their credibility to use withdrawing project finance or not providing future funding as a threat to ensure borrower compliance (Reisen, 2015).

SUMMARY

Overall, although there is evidence that VSS can contribute positively to biodiversity conservation there is still clear room for improvements in both the criteria of standards, the context in which they are used and how their impact is monitored. Many of the conclusions in the literature indicate that further research is needed, although there are challenges around the extra funding that would be required and how this could be conducted in a globally appropriate manner (SASC, 2012) 3.

ISEAL are constantly improving the thinking around standards. Recent suggestions have included technology improvements for better data collection leading to a reduction of costs for implementation which will help to show improvement and impact of standards. Currently, some of the barriers to certification remain high auditing costs, the challenge of small holder involvement within agriculture and the differentiation between high performers to encourage improvements.

Investment in public data would be helpful for continuing to build the evidence base, for example investment in multi-year public data sets on outcomes of interest, such as remote sensing data on forest degradation and large scale efforts to measure water quality or biodiversity. There is also a need to invest in public access to regularly updated information on the location of certified entities (Komives et al, 2018) 12

The challenge of incomplete knowledge around VSS is expected to remain, and therefore it is important to acknowledge the role of learning and adaptive policy in improving evolving certification and standard systems. VSS can have a role in conservation, but they should not be relied on as the only mechanism to achieve this, and it will depend on the context for which they are used in.

Transparency continues to be a key issue with financial safeguards, and with the emergence of the New Development Bank and the Asian Infrastructure Development Bank the need to ensure robust and comparable standards across all multi-lateral lending is crucial in ensuring that borrowers don't simply turn to lend from banks with less stringent requirements.



3. Mainstreaming biodiversity

As mentioned in Section 2 (The role of voluntary standards and safeguards in conservation) how biodiversity is addressed in the principles and criteria can vary between standards and safeguards. In Annex 1, we have highlighted four examples of this variation by looking at the principles and criteria of IFC, RSPO, FSC and ASI.

The partners involved in this CCI project have suggested that the following high level ambitions related to biodiversity should always be included within the criteria of a standard:

1. Suitable level of ambition or objective, such as No net loss or net gain of biodiversity
2. Mandatory application of the mitigation hierarchy
3. Adherence to international commitments, contributing to the CBD and FPIC
4. Equitable resource sharing and use

SUGGESTED REQUIREMENTS

The project partners decided that other biodiversity components would be worth discussing for inclusion if it is appropriate to the particular VSS or safeguard. Reviewing the comparison of 3 certification standards and one financial institution safeguard a set of broad requirements for standards and safeguards is provided below:

SUGGESTED REQUIREMENT	ASSURANCE
• Having a process to identify impacts and dependencies, and prioritise and manage these	• Completed corporate risk management framework • IBAT Risk Screening outputs
• Designating no go areas such as world heritage sites, protected areas and areas of high environmental sensitivity or where restoration is not feasible	• Disclosure of operational maps • No development in or sourcing from such areas • Requires supply chain transparency
• Identification, avoidance and management of ecosystem services and the capital, or stock, that provide these	• Application of the Natural Capital Protocol or other framework • Site management plans
• Proactive invasive species management	• Invasive species screening and management plans
• Management of secondary and cumulative impacts	• Setting appropriate area of influence in EIA and other documents • Full scoping of impacts
• Ensure no bushmeat hunting or illegal wildlife trade	• Existence of mandatory anti-bushmeat policy
• Having appropriate monitoring and evaluation	• Internal M&E covers biodiversity • Appropriate indicators tracked over time • Timely reporting under GRI

RECOMMENDATIONS TO IMPROVE VSS

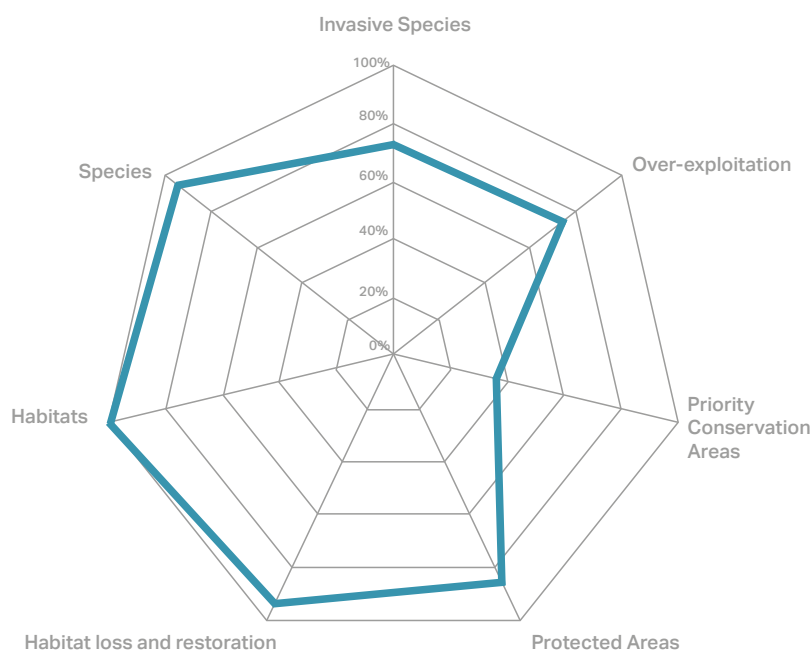
THE NEED FOR SPATIAL DATA

Where VSS are located can influence the impact on biodiversity. The literature suggests that there is currently a lack of GIS data available on the location of specific standards (Potts et al, 2017). A review funded by the Cambridge Conservation Initiative worked to collate all available spatial data from agricultural certification schemes. It found that while certification does correlate with the areas of high biodiversity and protection need, it does not correlate with areas of greatest social need; agricultural certification, for example, is not reaching the world's poorest farmers (Tayleur et al, 2018).

THE NEED TO CONSIDER THE LANDSCAPE

Most agricultural and mining VSS focus on the farm or mine site scale, therefore, biodiversity impacts are targeted and measured at this level. However, many biodiversity benefits need a landscape approach, which can lead to a mismatch when assessing the biodiversity impact of standards (Tsscharntke et al, 2015). One suggestion is to expand current certification models to consider the landscape as the certified unit rather than the farm or the mining operation. We are seeing a shift towards considering landscape approaches to drive sustainability. This shift is driven by challenges that result from overlapping drivers operating at scales that exceed the ability of individual companies to operate at. Landscape approaches have their own challenges in how sustainability progress is measured and improvement across a landscape is not linear; performance might increase one year but not the next and attributing outcomes is challenging (ISEAL, 2019).

One study examined provides a suggestion for a framework for improving methods to measure the conservation impact of sustainability standards (Milder et al, 2016). It states there are three main ways to measure the conservation impacts of VSS: through conserving existing natural ecosystems and their associated biodiversity, improving the conservation value of production systems and landscapes, and reducing off-site environmental impacts. New collaboration between the conservation research community and the VSS community is needed to develop common indicators and monitoring protocols important for designing methods (Milder et al, 2015).



In a review by the Convention on Biological Diversity (CBD) in 2011, 36 environmental standards were reviewed from 8 business sectors to understand how biodiversity was treated across each sector. They concluded there was variation in the definitions and treatment of biodiversity components, including 86% of standards examined recognised Protected Areas, but only 8 standards prohibited operating in Protected Areas (CBD, 2011).

Based on these findings, a number of improvements were suggested in order to enhance biodiversity protection:

- Adopting internationally recognized definitions
- Avoiding displacement of threats
- Including modified habitats as most standards only refer to natural habitats
- Provide guidance on operation inside Protected Areas
- Recognise indigenous and community conserved areas
- Safeguard priority conservation areas
- Adopt the mitigation hierarchy no net loss approach
- Monitor and report on biodiversity impacts by business,
- Include specific criteria relating to genetically modified GMOs in the guidelines
- Invasive species and overexploitation
- Landscape / seascape spatial planning and alignment of standards with large scale national and management objectives

EFFECTIVE VOLUNTARY SUSTAINABILITY STANDARDS

ISEAL is the global membership association for credible sustainable standards. They have members that meet their code of good practice, and are supported by international accreditation bodies. ISEAL's mission is to strengthen standard systems for the benefit of people and the environment. They work to shape the context in which sustainability standards systems operate by building consensus on what good practice looks like for the sector. ISEAL have numerous resources for developing standard systems that address environmental and social issues and deliver impact. One of these resources is their credibility principles, which have the following objectives:

- Provide an aspirational framework for standards systems to improve their knowledge and, thus, their ability to deliver sustainability improvements
- Aid users of standards systems (such as producers, procurement officials, companies, CSOs and financiers) in determining the relative credibility and effectiveness of the system
- Provide a communications tools to increase stakeholder understanding
- Distinguish good practice from good marketing

The ISEAL credibility principles⁶ and a summary are listed below:

PRINCIPLE	DESCRIPTION
Sustainability	Standards scheme owners clearly define and communicate their sustainability objectives and approach to achieving them. They make decisions that best advance these objectives.
Improvement	Standards scheme owners seek to understand their impacts and measure and demonstrate progress towards their intended outcomes. They regularly integrate learning and encourage innovation on to increase benefits to people and the environment
Relevance	Standards are fit for purpose. They address the most significant sustainability impacts of a product, process, business or service; only include requirements that contribute to their objectives; reflect best scientific understanding and relevant international norms; and are adapted where necessary to local conditions.
Rigour	All components of a standards system are structured to deliver quality outcomes. In particular, standards are set at a performance level that results in measurable progress towards the scheme's sustainability objectives, while assessments of compliance provide an accurate picture of whether an entity meets requirements.
Engagement	Standard-setters engage a balanced and representative group of stakeholders in standards development. Standards systems provide meaningful and accessible opportunities to participate in governance, assurance and monitoring and evaluation. They empower stakeholders with fair mechanisms to resolve complaints.
Impartiality	Standards systems identify and mitigate conflicts of interest throughout their operations, particularly in the assurance process and in governance. Transparency, accessibility and balanced representation contribute to impartiality.
Transparency	Standards systems make relevant information freely available about the development and content of the standard, how the system is governed, who is evaluated and under what process, impact information and the various ways in which stakeholders can engage.
Accessibility	To reduce barriers to implementation, standards systems minimise costs and overly burdensome requirements. They facilitate access to information about meeting the standard, training, and financial resources to build capacity throughout supply chains and for actors within the standards system.
Truthfulness	Claims and communications made by actors within standards systems and by certified entities about the benefits or impacts that derive from the system or from the purchase or use of a certified product or service are verifiable, not misleading, and enable an informed choice.
Efficiency	Standards systems refer to or collaborate with other credible schemes to improve consistency and efficiency in standards content and operating practices. They improve their viability through the application of sound revenue models and organisational management strategies.

⁶ <https://www.isealalliance.org/credible-sustainability-standards/iseal-credibility-principles>

EFFECTIVE SAFEGUARDS

Effective financial safeguards must guide two parallel processes – requirements for borrowers and guidance for the institution to assess compliance on an ongoing basis.

KEY ELEMENTS OF FINANCIAL SAFEGUARD	DESIRED CONTENT
An Over-arching Policy Statement	Key objectives, policies, principles, scope, hierarchy and organizing framework of the institution's approach to potential environmental and social impacts and risks of its activities. Content should combine aspirational and mandatory requirements, as it done in EBRD's Environmental and Social Policy .
Operational Requirements	These should be mandatory in their application to borrowers and other clients. IFC PS6 is currently seen as a good model for biodiversity requirements.
Environmental and Social Review Procedures	This must guide the Financial institution in conducting its due diligence, through preparation, approval, monitoring and supervision of projects and must be mandatory. An example is the World Bank Environmental And Social Directive For Investment Project Financing .
Access to Information Policies and portals	These apply broadly to information disclosure and public access to information obtained and generated. Such policies must include environmental and social safeguards, and should be mandatory for the institution. The Inter-American Development bank has such a policy . Disclosure prior to project approval is critical, and institutions such as the IFC has a Project Disclosure Portal which detail environmental and social implications and other relevant information prior to making an investment decision.
Guidelines, sourcebooks, manuals or other materials	These inform the implementation of "best practice" for borrowers/clients and for the institution carrying out safeguard requirements. Such provisions are strongly recommended but not usually normally mandatory unless designated as such in specific agreements with the borrower, such as IFC GN6 .

4. Guidelines for engagement

WHY ENGAGE

“The international CSOs’ role in amplifying the voice of project affected people is in fact one of the primary justifications for international CSOs participation in FI [financial institution] policymaking” (Hunter, 2008).

CSOs be effective drivers of change, inputting to standards and safeguard development as well as implementation as technical experts (Jones, 2016,) and can influence change in project outcomes (Pallas, 2010; Banks, 2012; Bohmelt and Betzold, 2013). In addition, CSOs can both generate and manage risks to companies and MFIs, for example, through consultancies and oversight of project safeguard compliance, enhanced reputation and social license to operate (Howard and Jenner, 2019; ICM, 2008).

There are many drivers of CSO engagement with standards. Below is a summary of the main drivers for CSO engagement (SASC, 2012):

- CSOs can view certification as a potential tool for advancing and accomplishing their own goals
- CSOs may not have the business or other expertise necessary to engage with large multi-national companies or issues of supply chain sustainability and corporate responsibility, therefore engagement with certification is a potential way of doing this
- No active recruitment of farmers – certification is driven by them being approached – CSOs can play a role to ensure that this is changes
- Or focus on expanding to areas where new commodity crops pose a threat to biodiversity?
- CSOs support traceability, encouraging better availability and quality of spatial data
- Encourage certification in areas of high biodiversity loss, or to strengthen the availability and quality of spatial data around certification schemes.

The latest thinking from ISEAL recommends that local consultations and workshops that try to include producers as well as other stakeholders are good to aid local CSO involvement. CSO involvement can provide the benefit of sharing baseline data, collection methods, or proposing new forms of biodiversity measurement for impacts that are appropriate to the local context.

SUCCESSFUL ADVOCACY ACTION TO IMPROVE STANDARDS:

CSO advocacy against the three Gorges Dam, a hydroelectric power generation project sponsored by the Chinese Government, led a march to the Clinton White House instructing the US export credit agency to decline to finance the dam. The World Bank also distanced itself from the project. CSOs then turned their attention to the commercial banks that subsequently committed to finance the project, and bank officials, worried about the effect their campaigns would have on their reputations, worked to adopt sustainability policies, and in October 2002, representative of nine commercial banks, joined by representatives of the IFC, met in London to discuss a more coordinated response. This led to the development of the Equator Principles Association; now comprising 101 financial institutions in 38 countries.⁷

Potential CSO involvement in global environmental governance (drawing on Gemmill & Bamidele-Izu, 2002):

- Expanding efforts at inclusion of local community-based groups
- Capacity building targeted at enhancing communication between local groups and other governance partners
- Support for initiatives to measure and monitor service delivery by CSOs and the use of benchmarking and the identification of best practices as a way to improve performance
- Expert advice and analysis: CSOs can facilitate negotiations by giving politicians access to competing ideas from outside the normal channels
- Consolidate efforts by certifying a higher proportions of farms in one area
- Mobilization of public opinion
- Representation of the voiceless – representing people not well represented in politics
- Service provision – technical expertise
- Monitoring and assessment – strengthen international agreements by monitoring negotiation efforts and governmental compliance
- Legitimization of global scale decision making mechanisms

⁷ Benjamin Richardson (2006) Financing Sustainability: The New Transnational Governance of Socially Responsible Investment, 17 YB, International Environment, Vol 73, Pg 89.



WAYS OF ENGAGING

“Better understanding how private regulations interact with the policy ecosystem will help design more effective interventions” (Lambin and Thorlakson, 2018).

The aim of engaging with standards and safeguards is primarily to avoid impacts and minimise degradation of nature. CSOs engage with standard and safeguard setting and implementation in a number of ways including:

- Creating standards and certification schemes: CSOs can act as catalysts, conveners and funders
- CSO role in identifying and setting standards
- Members of boards and active engagement in governance roles
- CSOs as certifiers and verifiers
- As stakeholders: CSOs can provide input in the form of comments on draft reports, audits, appeal of certification decision
- Engaging consumers and strengthening consumer influence
- Roles in campaigning for good sustainability performance and raising concerns about companies
- Engagement with industry
- Creation of buyer groups to help retailers find responsible suppliers

Choosing the right approach involves considering the current situation, the change desired (i.e. is it the content or the implementation of a VSS or safeguard), and who is best to create this change. Examples are provided below drawing on recent interactions by CSOs with the revision and implementation of financial safeguard and VSS.

APPROACH	SITUATION	BECAUSE	CHANGE DESIRED	THROUGH	BY WHO	EXAMPLE
Strengthening financial institution operating procedure	Projects funded by multiple lenders proving detrimental to a landscape as a whole	The WB ESG standards only applied to projects funded by WB (and even then not all funding)	To harmonise lending standard and ensure there was no 'race to the bottom' for borrowers	Financial institution focusses on bolstering borrower frameworks	Early engagement with an influential player such as DFID and coalitions to amplify the impact	World Bank piloting use of borrower systems to address safeguard issues
Creating a new standard	Catastrophic declines in farmland wildlife in the UK.	No adequate standard for biodiversity protection	Reintroduces key habitat elements into productive landscapes allowing nature to thrive in high yield systems.	Dedicate a set proportion of the productive landscape (10%) to biodiversity	Originally set up by a conservation minded manufacturer	Fair to Nature developed by Jordan Cereals in close collaboration with RSPB
Strengthening a standard	RSPO standard		Stronger environmental criteria	RSPO Standard Revision Process (once every five years)	CSOs engagement in working groups	Stronger Ps&Cs, new Planting Procedure, Remediation and Compensation Panel
Governing a standard	Stakeholders wanting more stringent requirement for mines	ASI-certified materials must come from responsible mining	Expanding no-go commitments and need to reintegrate ecosystem services.	Invited experts and discussion at the standards committee	CSOs and companies on the standards committee	Negotiation to produce revised draft ASI standard for public consultation

LESSONS FROM ENGAGEMENT WITH VSS AND SAFEGUARDS

CCI Partners were surveyed on their engagement with 8 global commodity (7 agricultural and one for metals), standards on development and governance, as well as their engagement with financial safeguards (2 global financial institutions) and responses were anonymised and presented under Challenges, Factors for Success, and Lessons learnt.

CHALLENGES

- Difficult to identify the appropriate entry-point to engage, particularly with safeguards
- The measurable, additional, success of voluntary measures such as certification still has a weak evidence base
- Certification standards are immensely technical and complex - engaging with any element meaningfully requires familiarising yourself with it every time you engage.
- It is difficult to engage with the third party certification bodies, which can have a vested interest in an operation being certified
- Experience that some voluntary standards have been misused to argue for weaker binding legislation and green subsidies and tax reforms while their ability to actually drive fundamental change in sectors seem to be extremely limited by the need to be "workable" for the industry.
- Not knowing whether the suggestions or input given would be taken up was a challenge - i.e. is the consultation really informing the development of some of the standards or is it just a process tick-box?
- Still not much in terms of any landscape scale impact from certification in general.
- Funding is a key barrier - not having funds to get to meetings, to cover time or expenses to respond in a meaningful way.
- Lobbying from companies to follow their line (i.e. asking for compromises on important BES points such as no go, objectives setting etc.)
- Often difficult to level with organisations with different expertise - e.g. the language around conservation/ethical trade is not attractive to business/corporate, although we all may aim towards the same outcome.
- The accessibility issue exists between local CSOs, people with English as their second language, people who are not a scientist, for example.
- Certain standard working groups such as RSPO working groups are only open to members, limiting direct involvement of CSOs in several processes if they are not a paying member.

SUCCESS FACTORS

- Seeking solutions in addition to problems (in terms of standard development); with regard to interactions with individual certifications
- Being part of a consultative change management process and seeing recommendations come through to final standard setting and certification requirements
- Focusing closely on the text of individual scoring issues and utilising data (published wherever possible) to ensure that operations were either not certified or certified with conditions
- Involvement in truly consultative initiatives where the balance of corporate and CSO input was carefully and transparently governed and was integral to the development of the standard in the first place.
- Being able to meet with people face to face; pre-competitive forums to voice concerns; understanding who to talk to (and who to avoid) e.g. who is the decision maker, who is the influencer; being clear on benefits of engagement; investing in knowledge sharing
- Ensuring adequate demand, for certified sustainable palm oil for example, is a key success factor for effective implementation of the standard.
- Engagement can take a lot of time, resources and advocacy to make a difference in global standards. Coalitions may be able to amplify the impact.

GENERAL RECOMMENDATIONS ON WHERE EFFORTS SHOULD BE FOCUSED

As CSO resources, and often expertise, for engaging with standard and safeguarding processes are often limited, a set of key lessons for effective engagement were drawn from the case studies of engagement. These are presented below as a guide to CSOs seeking to engage with either development, governance or implementation oversight of a standard or safeguard:

LESSONS

- Don't over-invest in engaging sustainability standards. They can only do so much of the job and often exclude some of the most important market actors in the most biodiverse parts of the world (e.g. small-scale operators).
- Always get engaged - the more voices the better and the better the outcome for BES.
- If you do engage, work with other NGOs to identify your 'niche' on a particular standard - don't try to be an expert in all issues - collaborate with others to identify your strengths and focus on those.
- Recognise that there are many vested interests engaging in the process of setting standards even among NGOs
- Align responses to consultations and in the development of new standards, but submit responses separately – more voices saying the same thing is better than one consolidated response
- Industry interests are very powerful and so we need a well-articulated and well balanced and strong business case to ensure issues are understood and included in standards etc.
- There are many standards/platforms/handbooks/frameworks - especially in coffee and cocoa, there is fatigue. Challenge that reticence by giving 'responsibility' - not just 'consultation' or 'information' (which is much easier to ignore). Pay for local partners to be equal partners.
- It is not just about avoiding 'reinventing the wheel' as the industry always moves in waves and cycles, fads and fashions - it must go further to critically analyse roles, accountabilities and visions, with a focus on decolonisation from rich-world-led initiatives.
- The engagement has been much more effective when a professional facilitator was supporting the Standard setting process and when the meetings were taking place face to face.
- Gaining critical mass, market recognition and brand uptake is difficult and takes considerable human and financial resources. It also requires business skills not often honed through conservation work.
- NGO collaboration prior to engagement with the standard body or financial institution
- Strategy / ToC needed – focus not on the "standards" but how you can change practice by having everyone required to carry out sustainable practices (as identified in the standards)
- Trust takes some time – therefore budget implications
- Need to understand the needs of different stakeholders so you can push for shared objectives
- NGO collaboration is not automatic – in some situations there was significant competition which hampered collaboration
- Early engagement may be more effective than engaging part-way through the process in developing standards
- By engaging in a lengthy consultation involving many thousands of people, the CSO's views were drowned out in the "noise". Perhaps by engaging early with an influential player may have been more effective.

NEXT STEPS FOR CCI

The outcomes of this project produced a few lessons on effective collaboration on the topic of safeguards and standards within CCI and beyond, these are summarised below:

1. Significant knowledge gaps exist, specifically on the methods, and data on implementation and impact of standards – CCI could prioritise work on what (data, partnerships, oversight) is needed to fill these gaps.
2. How do standards and safeguards interact with regulations, and at what point should they become regulation or just be supported by it? CCI could work to build on recommendations of McCarthy and Morling (2015).
3. Building on previous CCI work on spatial mapping and increased transparency and standardising the collection of biodiversity data for certification to measure its effectiveness
4. Where do standards fit within biodiversity conservation strategies? Create a typology and lessons from practice
5. Prioritising engagement with safeguards and standards
6. Governance gaps of certification schemes in terms of environmental CSOs representatives

CCI EXTERNAL ENGAGEMENT TO INFLUENCE SAFEGUARDS AND STANDARDS

1. Prepare proposals for a suite of upcoming consultations, potentially link with the climate change agenda, to ensure that CSOs are prepared and funded to engage effectively.
2. Collaborate with [ITC standards map](#) on how biodiversity is integrated into standards across the board
3. Collaborate with ISEAL – knowledge exchange, joint webinars, exploring how can ISEAL collect data on all new standards in a standardized way⁸
4. Link to post 2020 CBD framework on standards information, data sets, and potential indicators to improve impact monitoring and tracking over time
5. Identify and prepare key CSOs (around high value landscapes, for example) for standards and safeguard consultations on the topic of biodiversity based on CCI experience.

⁸ ISEAL representative in the workshop was interested to explore how ISEAL and CCI project partners could join up for next steps, and also asked what has saved time and money to CCI during engagement with standards?

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ANNEX 1: BIODIVERSITY RELATED PRINCIPLES AND CRITERIA

ELEMENT	SUMMARISED EXAMPLES OF WORDING	SOURCE OF FULL TEXT
Ambition	In areas of critical habitat, the client will not implement any project activities unless all of the following are demonstrated: • No other viable alternatives within the region exist for development of the project on modified or natural habitats that are not critical; • The project does not lead to measurable adverse impacts on those biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values; • The project does not lead to a net reduction in the global and/or national/regional population of any Critically Endangered or Endangered species over a reasonable period of time; and • A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the client's management program.	IFC Performance Standard 6, Paragraph 17
	The Organization shall maintain, conserve and/or restore ecosystem services and environmental values of the Management Unit, and shall avoid, repair or mitigate negative environmental impacts.	FSC Principle 6
	The Entity shall manage its biodiversity impacts in accordance with the mitigation hierarchy to protect ecosystems, habitats and species.	ASI Performance Standard 2017
	The Organization shall maintain and/or enhance the High Conservation Values in the Management Unit through applying the precautionary approach.	FSC Principle 9
Scope	Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment. For the purposes of implementation of this Performance Standard, habitats are divided into modified, natural, and critical. Critical habitats are a subset of modified or natural habitats.	IFC Performance Standard 6, Paragraph 9
	Critical habitats are areas with high biodiversity value, including (i) habitat of significant importance to Critically Endangered and/or Endangered species; (ii) habitat of significant importance to endemic and/or restricted-range species; (iii) habitat supporting globally significant concentrations of migratory species and/or congregatory species; (iv) highly threatened and/or unique ecosystems; and/or (v) areas associated with key evolutionary processes.	IFC Performance Standard 6, Paragraph 16

ELEMENT	SUMMARISED EXAMPLES OF WORDING	SOURCE OF FULL TEXT
Desired Outcomes	Ecosystems and their services are protected, restored and resilient, supported by sustainable consumption and production, and sustainable management of natural resources (in line with SDG 15 – sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss).	RSPO Principles and criteria 2018
	Climate change is addressed through continuous GHG reductions; air and water pollution are controlled. There is greater resilience in our food and fibre production. The water and air are cleaner, and carbon is drawn out of the air to regenerate soils for current and future generations. Inputs decrease while yields are maintained, or even improved.	RSPO Principles and criteria 2018
Screening/Scoping Risk	The Organization shall assess environmental values in the Management Unit and those values outside the Management Unit potentially affected by management activities. This assessment shall be undertaken with a level of detail, scale and frequency that is proportionate to the scale, intensity and risk of management activities, and is sufficient for the purpose of deciding the necessary conservation measures, and for detecting and monitoring possible negative impacts of those activities.	FSC Principle 6, Criteria 6.1
	Biodiversity assessment. The Entity shall assess the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence.	ASI Principle 8, Criteria 8.1
	Prior to the start of site-disturbing activities, The Organization shall identify and assess the scale, intensity and risk of potential impacts of management activities on the identified environmental values.	FSC Principle 6, Criteria 6.2
Alien / Invasive Species	Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	RSPO Principle 7, Criteria 7.1
	Where alien species are already established in the country or region of the proposed project, the client will exercise diligence in not spreading them into areas in which they have not already been established. As practicable, the client should take measures to eradicate such species from the natural habitats over which they have management control.	IFC Performance Standard 6, Paragraph 23
	The Entity shall proactively prevent accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity.	ASI Principle 8, Criteria 8.3

ELEMENT	SUMMARISED EXAMPLES OF WORDING	SOURCE OF FULL TEXT
Ecosystem services	Where a project is likely to adversely impact ecosystem services, as determined by the risks and impacts identification process, the client will conduct a systematic review to identify priority ecosystem services.	IFC Performance Standard 6, Paragraph 24
	With respect to impacts on priority ecosystem services of relevance to Affected Communities and where the client has direct management control or significant influence over such ecosystem services, adverse impacts should be avoided.	IFC Performance Standard 6, Paragraph 25
Soil Fertility	Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	RSPO Principle 7, Criteria 7.4
	Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	RSPO Principle 7, Criteria 7.2
Waste management	Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	RSPO Principle 7, Criteria 7.3
Biodiversity Management	The Entity shall implement a Biodiversity Action Plan with time-bound targets to address material impacts identified through criterion 8.1 and monitor its effectiveness.	ASI Principle 8, Criteria 8.2a
Sensitive Areas	Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest.	RSPO Principle 7, Criteria 7.12
	HCVs and HCS forests in the managed area are identified and protected or enhanced.	RSPO Principle 7, Criteria 7.12
	The Organization, through engagement with affected stakeholders, interested stakeholders and other means and sources, shall assess and record the presence and status of the following High Conservation Values in the Management Unit, proportionate to the scale, intensity and risk of impacts of management activities, and likelihood of the occurrence of the High Conservation Values	FSC Principle 9, Criteria 9.1
	Commitment to "No Go" in World Heritage properties. An Entity engaged in Bauxite Mining shall: a. Not explore or develop new mines in World Heritage properties.	ASI Principle 8, Criteria 8.4

ELEMENT	SUMMARISED EXAMPLES OF WORDING	SOURCE OF FULL TEXT
Water	Practices maintain the quality and availability of surface and groundwater.	RSPO Principle 7, Criteria 7.8
	The Organization shall protect or restore natural water courses, water bodies, riparian zones and their connectivity. The Organization shall avoid negative impacts on water quality and quantity and mitigate and remedy those that occur.	FSC Principle 6, Criteria 6.7
Landscape approach	The Organization shall protect rare species and threatened species and their habitats in the Management Unit through conservation zones, protection areas, connectivity and/or (where necessary) other direct measures for their survival and viability. These measures shall be proportionate to the scale, intensity and risk of management activities and to the conservation status and ecological requirements of the rare and threatened species. The Organization shall take into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.	FSC Principle 6, Criteria 6.4
	The Organization shall effectively maintain the continued existence of naturally occurring native species and genotypes, and prevent losses of biological diversity, especially through habitat management in the Management Unit*. The Organization shall demonstrate that effective measures are in place to manage and control hunting, fishing, trapping and collecting.	FSC Principle 6, Criteria 6.6
	Where a client is purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems and verification practices will be adopted as part of the client's ESMS to evaluate its primary suppliers.	IFC Performance Standard 6, Paragraph 30
Restoration / Rehabilitation	An Entity engaged in Bauxite Mining shall: a. Rehabilitate environments disturbed or occupied by mining activities, using best available techniques to achieve outcomes agreed through participatory processes with key stakeholders in the mine closure planning process.	ASI Principle 8, Criteria 8.5a

