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## [Civil society statement on biodiversity offsets and credits](#)

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We, the undersigned, express our grave concerns about biodiversity crediting, offsetting, and related trading schemes. Biodiversity markets are being modelled on the carbon markets, which have serious failings. Additionally, there are insurmountable problems and dangers:

### **A wrong answer to the wrong question**

- The justification for biodiversity offsets and credits is that there is a huge gap between the funding needed and what is available for biodiversity protection. Biodiversity offsets and credits build on a top-down, fortress conservation model, which is highly ineffective, costly, has often involved human rights abuses, and is the wrong response to address biodiversity loss.
- Instead, other proven forms of biodiversity protection, such as the legal designation of Indigenous Peoples' territories, and environmental regulation and enforcement, should be implemented.
- There is a deficit in the prevention and regulation of biodiversity-destructive activities, which amounted to \$7 trillion annually in 2023. Reforming and redirecting harmful subsidies, estimated to be \$1.7 trillion in 2022 and providing public financing in the form of grants, are better ways to address the funding gap, avoiding the need for risky financing schemes.<sup>1</sup>
- Just as carbon offsetting delays climate ambition, biodiversity offsetting will only delay urgent action on addressing the root causes of biodiversity loss.

### **Offsetting and greenwashing**

- Cumulative land-based carbon-removal pledges, before the new land-based biodiversity credits that are now being scaled up, added up to 1,200 million hectares globally, nearly as much as all agricultural land.<sup>2</sup> There is no more land to offset carbon emissions or biodiversity loss without displacing peoples and undermining food systems.
- Based on the long experience with carbon credits, claims that biodiversity credits are 'additional contributions' to biodiversity protection and would not ultimately be used for offsetting purposes are either naïve or false.<sup>3</sup> If biodiversity credits are purchased without the intention of using them for offsetting purposes, they are most likely purchased for greenwashing purposes.

### **Failing on equity and rights**

- International biodiversity markets could allow elites, especially in the Global North, to continue destroying ecosystems, whilst purchasing cheap and abundant credits from the Global South.
- Biodiversity offsetting can create conflicts over tenure rights and the use of lands, fisheries and

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forests, competing with agroecology and smallholder agriculture, undermining food sovereignty. It will likely drive land grabbing, community displacements, increasing land inequality<sup>4</sup> and human rights abuses, just as carbon offsets do.<sup>5</sup>

- Indigenous Peoples, local communities, peasants and other small-scale food producers, women and youth, the guardians of most of the planet's biodiversity, typically have received only a fraction of the proceeds of offset projects in their lands, whereas project developers and financial intermediaries receive the biggest share. Resources generated by market supply and demand are further unlikely to be equitably accessible for communities.

### **Perpetuating market-driven failures**

- The commodification of nature through the monetary valuation of ecosystem functions and the creation of biodiversity markets runs fundamentally in opposition to the cosmologies of many Indigenous Peoples and other communities, who understand Nature as our mother, not as a commodity.<sup>6</sup>
- Biodiversity offsets and credits allow private markets to price and prioritize biodiversity actions, diminishing governments' role in biodiversity protection as a public good. Market-based biodiversity protection, driven primarily by short-term financial considerations, cannot be consistent with scientific knowledge on species and ecosystem prioritization needs<sup>7</sup>.
- Offsetting schemes typically rely on creating a future scenario of what would have happened without the project. These 'baseline' scenarios have proven extremely easy to manipulate, resulting in false and worthless credits.
- Proving 'additionality' is difficult, as it is impossible to demonstrate that conservation outcomes would not have happened otherwise. Achieving 'permanence', i.e. demonstrating that the positive changes will last over time, is inherently impossible. 'Leakage', where the negative impacts on biodiversity will only be shifted elsewhere, is a tangible risk.
- The problems with additionality, permanence, leakage, and baseline manipulation will be much more severe and intractable in biodiversity markets than in carbon markets, where these problems already exist.

### **Weak measurement methodologies**

- Finding a common unit for biodiversity accounting purposes would involve serious oversimplification of ecosystem values and functioning. It is not possible to simplify millions of species and their complex web of interdependences into a few tradable assets<sup>8</sup>.
- Proposals to measure biodiversity gains are based on poor methodologies, many of which allow the cherry-picking of indicators, ignoring important and unique attributes of ecosystems.
- The different ways of living from, in, with, and as, nature illustrate the challenges of taking into account the diverse values held by peoples, which are not comparable or interchangeable<sup>9</sup>.

### **Uncertain revenues**

- 'Investment' through biodiversity markets will be unstable and changeable, leading to

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unpredictable revenue swings for recipients, and fickle economic incentives for conservation<sup>10</sup>.

- No major companies have confirmed their interest in purchasing biodiversity credits. Moreover, they are pulling out of the carbon markets after recent exposes of their inherent flaws. There is every reason to expect that the biodiversity market will follow the same path.

### **Poor governance and conflicts of interest**

- There is an absence of effective regulation based on human rights and environmental law. Biodiversity offsets and credit schemes that create human rights violations, or do not live up to minimal environmental standards, are rarely sanctioned.

- The central involvement of organizations such as Verra is highly problematic. They have been responsible for issuing hundreds of millions of phantom carbon credits and have been unable to prevent human rights abuses in projects audited in accordance with their standards<sup>11</sup>.

- The experience with carbon markets showed us that there is a conflict of interest when it is the same organization which is financially benefiting from the issuance of credits whilst overseeing the process of standard-setting and third-party validation and verification.

Biodiversity credits and offset schemes are false solutions to a false problem – there are much better ways to increase biodiversity financing, without recourse to these risky schemes. Biodiversity offsetting, like carbon offsetting, enables rich countries, corporate actors, financial institutions, and other actors to profit from the biodiversity crisis they have created and maintain the status quo, avoiding implementing politically difficult decisions to regulate destructive activities domestically, while creating a new asset class for their financial sectors.

We call on governments, multilateral bodies, conservation organizations and other actors to stop the promotion, development and use of biodiversity offsetting and crediting schemes. Instead, we call on them to prioritize transformational change in tackling the underlying causes of biodiversity loss, including: promoting effective regulation of harmful corporate activity; recognizing, respecting, protecting and promoting the right to land of Indigenous Peoples, local communities, small-scale food producers and women; stopping financial flows and investments that are harmful to biodiversity and peoples; removing harmful government subsidies; changing production and consumption patterns especially of the rich; supporting a just transition, including the transformation of food systems toward agroecology; ensuring funds flow directly and fairly to Indigenous Peoples, local communities, small-scale food producers, women and youth for community-led approaches; pursuing effective and equitable means of conservation; and taking immediate steps to phase down the supply and use of fossil fuels.

**SIGNATORIES (as of 29 September 2024)** - [See here](#) the updated list of signatories.

### **Global Civil Society Organizations**

1. A Growing Culture
2. Association For Promotion Sustainable Development
3. BankTrack
4. CIDSE (Coopération internationale pour le développement et la solidarité)
5. Community And Family Aid Foundation-Ghana
6. Corporate Accountability

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7. Denkhausbremen
  8. EcoNexus
  9. ECOS
  10. Environmental Investigation Agency
  11. ETC Group
  12. Fern NGO
  13. FIAN International
  14. Friends of the Earth International
  15. Global Forest Coalition
  16. Global Justice Association
  17. Global Justice Ecology Project
  18. Global Youth Biodiversity Network
  19. GRAIN
  20. Green Global Future
  21. Habitat International Coalition- Housing and Land Rights Network
  22. Heinrich Böll Foundation
  23. HEKS/EPER Swiss Church Cooperation
  24. Indigenous Environmental Network
  25. Initiative for Equality (IfE)
  26. INSPIRIT Creatives
  27. International Accountability Project
  28. IUCN CEM Eastern Europe
  29. MOBILIZED NEWS NETWORK
  30. Navdanya International
  31. Profundo
  32. Rainforest Action Network
  33. Rainforest Foundation UK
  34. Rettet den Regenwald
  35. Schola Campesina Aps
  36. Smart Youth Network Initiative
  37. Society for International Development
  38. Survival International
  39. Third World Network
  40. Transnational Institute
  41. Tripla Difesa On Ius Guardie Sicurezza Sociale ed Eco Zoofila
  42. Udaan Youth Club
  43. War on Want
  44. What Next?
  45. Women4Biodiversity
  46. Women's Earth and Climate Action Network (WECAN) International
  47. Women's Environment and Development Organization
  48. WOMENVAI
  49. World Animal Protection
  50. World Rainforest Movement

### **Regional Civil Society Organizations**

51. Action for Climate and Environmental Sustainability ~ ACES
  52. Alianza Biodiversidad en América Latina
  53. Biofuelwatch
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54. Chirapaq/ECMIA
  55. Convergence Globale des Luttes pour la Terre, eau et les semences paysannes CGLTE-OA
  56. Corporate Europe Observatory
  57. Earth Thrive
  58. Ecoropa
  59. FIDEPE (Fondation Internationale pour le Développement, l'Éducation, l'Entrepreneuriat et la Protection de l'Environnement)
  60. Focus on the Global South
  61. Friends of the Earth Europe
  62. Gritode los Excluidos Continental
  63. Instituto Maíra
  64. Instituto Madeira Vivo
  65. JVE
  66. MAELA
  67. Mouvement d'Action Paysanne
  68. Natural Justice
  69. Ogiek Peoples' Development Program (OPDP)
  70. Pacto Ecosocial e Intercultural del Sur
  71. PAN Asia Pacific
  72. PELUM Association
  73. Pesticide Action Network Asia Pacific
  74. Redde Acción en Plaguicidas, RAP-AL
  75. Redde Cooperación Amazónica REDCAM
  76. Resilient40 (R40) Africa
  77. Southeast Asia Regional Initiatives for Community Empowerment
  78. TAFATAFA
  79. Tamil Nadu Land Rights Federation
  80. Youth Volunteers for Environment Ghana

### **National Civil Society Organizations**

81. Aalem for Orphan and Vulnerable Children, Inc.
82. Abibi Nsroma Foundation
83. Acción Ecológica
84. Actions Sans Frontières
85. ADJMOR
86. Aksi! for gender, social and ecological justice
87. Al-Haq
88. Alliance for Sustainable and Holistic Agriculture (ASHA)
89. Asociación Nacional de Empresas Comercializadoras de Productores del Campo AC
90. Association for Farmers Rights Defense, AFRD
91. Association Nigérienne des Scouts de l'Environnement (ANSEN)
92. Association of Young People for Environmental Protection in Guinea-Bissau
93. Association pour la Conservation et la Protection des Écosystèmes des Lacs et l'Agriculture Durable
94. Association Pour la protection de l'Environnement et le Développement Durable de Bizerte (APEDDUB)
95. Awaz CDS-Pakistan
96. Awinakola Foundation
97. Biodiversity Conservation Center

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98. Biowatch South Africa
  99. Broederlijk Delen
  100. Brot für die Welt
  101. Bruno Manser Fonds
  102. Build Peace and Development
  103. CAMBIUM
  104. Censat Agua Viva
  105. Center for Environment/FoE BiH
  106. Center for Peace Education and Community Development
  107. Centre for Citizens Conserving Environment & Management (CECIC)
  108. Centro de estudios Heñói
  109. Centro de Estudios y apoyo al Desarrollo Local
  110. Centro Ecosocial Latinoamericano
  111. Centro Eori de Investigación y Promoción Regional
  112. Centro Interdisciplinario de Investigación y Desarrollo Alternativo U Yich Lu'um
  113. Chandra Jyoti Integrated Rural Development Society (CIRDS) Dhading Nepal
  114. Climate and Community Project
  115. Colectivo por la Autonomía
  116. Collectif pour la défense des terres malgaches -TANY
  117. Collective Determination
  118. Consumers' Association of Penang
  119. Dejusticia - Centro de Estudios de Derecho, Justicia y Sociedad
  120. DKA Austria - Dreikönigsaktion der Katholischen Jungschar
  121. Don't gas Indonesia
  122. DUKINGIRE ISI YACU (DIY)
  123. ECOLISE
  124. Ecologistas en Acción
  125. ECORE
  126. Ei polteta tulevaisuutta
  127. Enda Pronat
  128. ESG
  129. Family Farm Defenders
  130. FDCL-Center for Research and Documentation Chile-Latin America
  131. FIAN Belgium
  132. FIAN Brasil
  133. FIAN Deutschland
  134. FIAN Ecuador
  135. FIAN India
  136. FIAN Indonesia
  137. FIAN Paraguay
  138. FIAN Sri Lanka
  139. FIAN Switzerland
  140. FIAN UGANDA
  141. FIAN ZAMBIA
  142. FIAN, NEPAL
  143. FOCSIV Italian Federation Christian NGOs
  144. Focus Association for Sustainable Development
  145. Forum Ökologie & Papier
  146. Friends of the Earth Australia
  147. Friends of the Earth Canada

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148. Friends of the Earth England, Wales and Northern Ireland
  149. Friends of the Earth Japan
  150. Friends of the Earth Sri Lanka/CEJ
  151. Friends of the Earth US
  152. Fundación Ambiente y Recursos Naturales (FARN)
  153. Fundación Chile Sustentable
  154. Global Media Foundation LBG
  155. Good Health Community Programmes
  156. Gramya Resource Centre for Women
  157. Grupo Semillas
  158. Hope of Africa (HOFA) Cameroon
  159. Igapo Project
  160. Indigenous Environmental Network
  161. Indigenous Taiwan Self-Determination Alliance
  162. Investigación y Acción Biocultural, Anima Mundi, A.C.
  163. JA! Justica Ambiental/FOE Mozambique
  164. Jamaa Resource Initiatives
  165. JPIC Kalimantan
  166. Just Forests
  167. Justica Ambiental - JA!
  168. Kalpavriksh
  169. KOO - Co-ordination office of the Austrian Bishops' Conference for international development and mission
  170. KRuHA - people's coalition for the right to water
  171. Landelijk Netwerk Bossen-en Bomenbescherming
  172. Leefmilieu
  173. Legal Resources Centre
  174. Legal Rights and Natural Resources Center (LRC)
  175. Les Amis de la Terre - Belgique asbl (FoE Belgium)
  176. Les Amis de la Terre-Togo
  177. Lok Shakti Abhiyan
  178. Maryknoll Office for Global Concerns
  179. Masifundise Development Trust
  180. MAUSAM Movement for Advancing Understanding of Sustainability and Mutuality
  181. Milieu defensie
  182. Monteverde Commission for Resilience to Climate Change
  183. Mouvement Ecologique asbl., FoE Luxembourg
  184. Movimiento Independiente Indigena Lenca de la Paz Honduras MILPAH
  185. Naturaleza con Derechos
  186. ÖBV-Via Campesina Austria
  187. OFRANEH
  188. ONG
  189. ONG ACIEDD
  190. ONG ASHAD
  191. Pakistan Fisherfolk Forum
  192. Participatory Research & Action Network -PRAAN
  193. Pastoralists Alliance for Resilience and Adaptation Across Nations (PARAAN)
  194. People's Vigilance Committee on Human Rights (PVCHR)
  195. Persatuan Aktivis Sahabat Alam - KUASA, Malaysia
  196. Persatuan Pemeliharaan dan Pemuliharaan Alam Sekitar Sarawak (PELIHARA)

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197. Pertubuhan Pelindung Khazanah Alam Malaysia (PEKA)
  198. PILIER AUX FEMMESVULNERABLESACTIVES - PIFEVA
  199. Pro Natura / Friends of the Earth Switzerland
  200. Protect The Forest
  201. Reacción Climática
  202. ReCommon
  203. Red de Coordinación en Biodiversidad
  204. Red Dominicana de Estudios y Empoderamiento Afrodescendiente -Red Afros
  205. Réseau des Jeunes pour le Développement Durable -Madagascar
  206. Réseau Nigerien des Défenseurs des Droits Humains RNDDH
  207. Roots for Equity
  208. RSCDA-IO
  209. Rural Integrated Center For Community Empowerment
  210. RURAL RECONSTRUCTION FOUNDATION (RRF)
  211. Sahabat Alam Malaysia
  212. Salva la Selva
  213. Save Our Rice Campaign Network
  214. Size of Wales
  215. Slow Food Deutschland
  216. Small Scale Livestock and Livelihoods Program
  217. SNEHAKUNJA Trusthonnavaar Karnataka
  218. Support for Women in Agriculture and Environment (SWAGEN)
  219. Sustainable Development Institute (SDI)
  220. The Australia Institute
  221. The Development Institute
  222. The Green Institute
  223. The Oakland Institute
  224. TORANG TRUST
  225. Trend Asia
  226. Ubuntu learning hub Trust
  227. Unidad de la Fuerza Indígena y Campesina
  228. vzw Climaxi
  229. Welthaus Diözese Graz-Seckau
  230. Zambia Alliance for Agroecology and Biodiversity (ZAAB)
  231. Zambian Governance Foundation for Civil Society (ZGF)
  232. Zimbabwe People's Land Rights Movement

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239. Aruna Rodrigues, India
240. Carlos Augusto Pantoja Ramos, Brasil
241. Christine Leiser, Germany
242. David Barkin, Mexico
243. Dr. med. vet. Anita Idel, Germany



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  246. Floren Satizabal P., Colombia
  247. Gerardo Cerdas Vega, Costa Rica
  248. Giulia Chersoni, Italy
  249. Guillaume Carbou, France
  250. Helen Newing, UK
  251. Jackie Sunde, South Africa
  252. Janis Alcorn, Canada
  253. Jeff Corntassel, Cherokee Nation citizen; Canada
  254. John Thackara, UK
  255. K. Nadeesha Nisansala, Sri Lanka
  256. Kshama Nagaraja
  257. Kudzai, South Africa
  258. Kyle, Spain
  259. Liliana Buitrago , Venezuela
  260. Maria Carolina Olarte, Colombia
  261. Marie Bouchet, France
  262. Michel PIMBERT, UK
  263. Mike Jones, Sweden
  264. Nora Faltsmann, Austria
  265. Olivier Hamerlynck, Mozambique
  266. Peter Mukasa Reutter, Germany
  267. Prof Jack Heinemann, New Zealand
  268. Rajeswari S. Raina, India
  269. Rosario Carmona, Norway
  270. S Faizi PhD, India
  271. Saloni, India
  272. Yung En Chee, Australia

<sup>1</sup> UNEP 2023. State of Finance of Nature, <https://www.unep.org/resources/state-finance-nature-2023>

<sup>2</sup> Dooley K., Keith H., Larson A., Catacora-Vargas G., Carton W., Christiansen K.L., Enokenwa Baa O., Frechette A., Hugh S., Ivetic N., Lim L.C., Lund J.F., Luqman M., Mackey B., Monterroso I., Ojha H., Perfecto I., Riamit K., Robiou du Pont Y., Young V., 2022. The Land Gap Report 2022, <https://www.landgap.org/>

<sup>3</sup> Green Finance Observatory, GFO's response to IAPB's consultation on archetypes, 29 April 2024 <https://greenfinanceobservatory.org/wp-content/uploads/2024/04/IAPBconsultation2v5.pdf>

<sup>4</sup> IPES-Food, 2024. Land Squeeze: What is driving unprecedented pressures on global farmland and what can be done to achieve equitable access to land? <https://ipes-food.org/report/land-squeeze/>

<sup>5</sup> Kill J, Franchi G, Rio Tinto's biodiversity offset in Madagascar – Double landgrab in the name of biodiversity?, World Rainforest Movement, Re:Common, March 2016. [https://wrm.org.uy/wp-content/uploads/2016/04/RioTintoBiodivOffsetMadagascar\\_report\\_EN\\_web.pdf](https://wrm.org.uy/wp-content/uploads/2016/04/RioTintoBiodivOffsetMadagascar_report_EN_web.pdf); Re:common, Turning forests into hotels The true cost of biodiversity offsetting in Uganda, Apr 2019

<https://www.recommon.org/en/turning-forests-into-hotels-the-true-cost-of-biodiversity-offsetting-in-uganda/>; The Guardian, 'Nowhere else to go': forest communities of Alto Mayo, Peru, at centre of offsetting row, January 2023, <https://www.theguardian.com/environment/2023/jan/18/forest-communities-alto-mayo-peru-carbon-offsetting-aoe>; Mongabay, Shell affiliate accused of violating

Indigenous rights in carbon credit contracts, November 2023

<https://news.mongabay.com/2023/11/shell-affiliate-accused-of-violating-indigenous-rights-in-carbon->

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[credit-contracts/](#); Counsell S., Survival International, Blood Carbon: how a carbon offset scheme makes millions from Indigenous land in Northern Kenya, March 2023,

[https://assets.survivalinternational.org/documents/2466/Blood\\_Carbon\\_Report.pdf](https://assets.survivalinternational.org/documents/2466/Blood_Carbon_Report.pdf)

<sup>6</sup> Rojas-Marchini F and Carmona R. Biodiversity offsets and credits: Key aspects that make them problematic for protecting biodiversity, Third World Network Briefing Paper, March 2024. [See here](#).

<sup>7</sup> As an example, figure S2 in the following article shows early evidence of large concentration of offsets (23% of the dataset) on “moderate condition other neutral grassland” in the UK’s Biodiversity Offset Market. Rampling, E., zu Ermgassen, S.O.S.E., Hawkins, I. and Bull, J.W., 2023. Achieving biodiversity net gain by addressing governance gaps underpinning ecological compensation policies. *Conservation Biology*, <https://osf.io/preprints/osf/avrhf>

<sup>8</sup> Evidence from New South Wales’ biodiversity offset market shows that a large number of credit types leads to an illiquid market: “Liquidity of the credit market 7.6 As noted above, there are over 1,000 different credit types that can be traded under the scheme. Stakeholders noted that this reflects the complexity of biodiversity, but the result is that the credit market is also complex, and largely illiquid.”

New South Wales Parliament, Integrity of the NSW Biodiversity Offsets Scheme, Report 16, November 2022. [See here](#).

<sup>9</sup> Pascual, U. et al. Diverse values of nature for sustainability. *Nature*, v. 620, n. 7975, p. 813–823, 2023. <https://doi.org/10.1038/s41586-023-06406-9>

<sup>10</sup> As an example, UK’s new “environmental services” payments to farmers will go hand in hand with a phasing out of direct farming subsidies. Horton H, *The Guardian*, Revealed: farmers received only tiny sum from post-Brexit sustainability fund last year, 12 February 2023,

<https://www.theguardian.com/environment/2023/feb/12/farmers-post-brexit-payments>; *Farmers Weekly*, Defra confirms reductions in support for farmers, 24 February 2020,

<https://www.fwi.co.uk/business/payments-schemes/defra-confirms-reductions-in-support-for-farmers>

<sup>11</sup> Greenfield P, *The Guardian*, Revealed: more than 90% of rainforest carbon offsets by biggest certifier are worthless, analysis shows, 18 January 2023,

<https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggest-provider-worthless-verra-aoe>