
[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.¹
- 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.² 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.³ 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

forests, competing with agroecology and smallholder agriculture, undermining food sovereignty. It will likely drive land grabbing, community displacements, increasing land inequality⁴ and human rights abuses, just as carbon offsets do.⁵

- 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.⁶
- 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 needs⁷.
- 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 assets⁸.
- 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 interchangeable⁹.

Uncertain revenues

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

unpredictable revenue swings for recipients, and fickle economic incentives for conservation¹⁰.

- 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 standards¹¹.

- 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 défensedesterrés 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 Nigérien 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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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
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 267. Prof Jack Heinemann, New Zealand
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 269. Rosario Carmona, Norway
 270. S Faizi PhD, India
 271. Saloni, India
 272. Yung En Chee, Australia

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

² 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/>

³ 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>

⁴ 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/>

⁵ 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; 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->

[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

⁶ 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](#).

⁷ 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>

⁸ 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](#).

⁹ 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>

¹⁰ 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>

¹¹ 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>