

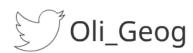
No Net Loss of What, for Whom?

Reconnecting compensation with value

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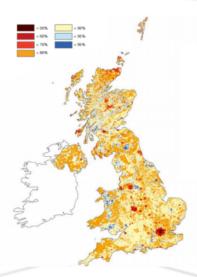


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Problem space

- Continued species decline of biodiversity + ecosystems
- UK's biodiversity intactness < Global average
- Implications of Brexit



RSPB (2016). State of Nature Report 2016.

[Biodiversity Intactness Index]

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Context of study

- Widening gap between policy + science
- Diverse interpretations of 'No Net Loss'
- Need for multi-stakeholder perspective



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Methodology

Stakeholder groups:

- 1) Offsetters
- 2) Academics
- 3) Environmental NGOs
- 4) Local authorities

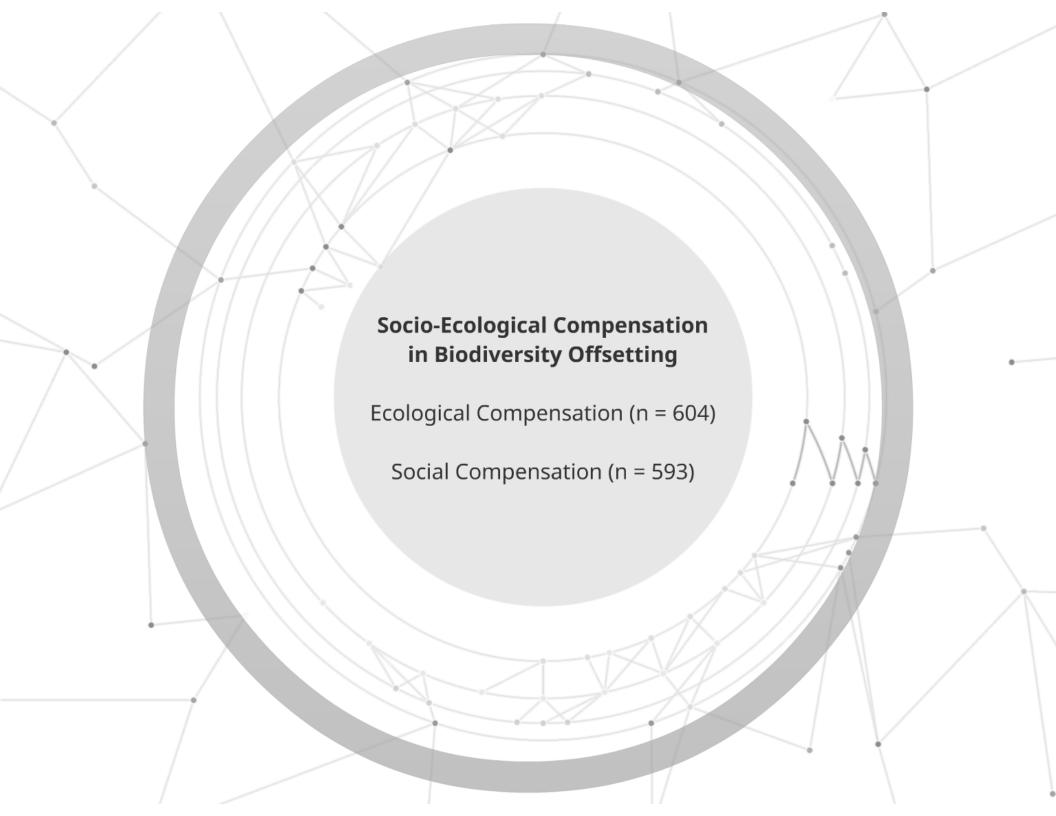
Methods (Inductive):

- Transcribed verbatim
- 80 pages of transcriptions
- Thematically coded (3-cycle coding)

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Ecological Compensation

Calculating biodiversity offsets Understanding and Communicating value

Economic valuation

Simplification of planning and development

Biodiversity offsetting strengthening existing regulation Governance vs governance Base lines and additionality

Regulatory Environment

Neo-liberalism Marketising Nature Policy context Rogue trading

Carbon offsetting Longevity Implementation

Failures of current system

Austerity and impact on regulatory resources of local authorities Ecosystem services National Context

Equivalence Regulation of offsets

Adherence to the mitigation hierarchy

Uncertainty Undermining existing safeguards on nature Simplicity of DEFRA metric

Valuing Biodiversity

Multiple interpretation of DEFRA metric

Implementation

- 1] Policy failure
- 2] \ Regulatory resources
- 3] ↑ Role of the private sector

Biodiversity Offsetters

"We've got a local council whose budget is being stripped every single year and they own a lot of biodiversity spots that they have no money to manage, no money to do anything."

"[Biodiversity Offsetting] an absolute godsend for most local authorities [whose] budgets are being slashed every single year"

Academics

"Concern around private sector finance: which is meant to be additional to enhance areas or give additional land around SSSIs Sites of Special Scientific Interest] might creep into what should be the statutory duty of government to be funding."

"I can see on the ground, the things on the ground implemented for mitigation, there has been no research done on them at all as to whether they actually work . . . We've spent a lot of money and it's not ecologically delivering at all."

Environmental NGOs

shades of grey, where there were not any before, over what can and cannot be developed on.

Local Authorities

Policy failure due to a lack of "forward planning for biodiversity", emphasizing the need to go " . . . through the mitigation hierarchy at the pre-site allocation stage of the plan so that any sensitive sites are knocked out before they even get in to the system for development".

Valuing biodiversity

1] Calculating offsets2] Economic valuation

Biodiversity Offsetters

"using numbers to translate and communicate biodiversity to the business people has really transformed my work . . . it becomes so much more powerful in terms of getting them [businesses] engaged"

"We need to do something and we need to do it now and strive for perfection in the future"

Academics

"Biodiversity Offsetting à la green paper is probably **fundamentally flawed** in any respect and **may only help the planners**. [It is] a dog's breakfast of **ill-defined stuff** . . . a bit woolly and not very well put together and really talks about individual species and not ecological processes."

". . . if people start thinking that this is a highly developed science then there is a risk . . . these numbers are broad representatives to try to do better than we do at the moment, but compared to some other schemes they are quite **laughable in their simplicity**."

"If we get into a complete viewpoint where everything we can put a monetary value on it and all into economic terms and not consider **our moral and almost spiritual need for nature** then that's quite a depauperate way of viewing nature. So I think you can **use those tools with caution**. But you need to step outside that and **recognize** both **the irreplaceable** aspects of nature and moral, intrinsic aspects of nature you can't value"

Environmental NGOs

"It's a really sensible tool if we're in an ideal, fluffy bunny world where everyone is out for the best, but unfortunately that isn't the way things are run . . . it's going to become a tool that enables the speeding through of development"

Local Authorities

"not convinced offsetting itself should be made mandatory".

Social Compensation

Power assymmetries and Class vetoing Buying out communities (bribing for access) Experiences in carbon offsetting and REDD in developing countries

Social Justice and Equity

Participation and social exclusion of affected communities Impact of austerity on declining role of the state

Private Sector (developers) Prior informed consent

Stakeholder inclusion Equity

Inter-generational Role of state Intra-generational Access to nature Role of civil society

Management of the commons Stakeholder consultation Traditional Ecological Knowledge

Distributive Justice Procedural and consequential justice Intrinsic and cultural value of nature and cultural debts from offsetting

Stakeholder inclusion

No Net loss for whom?

Biodiversity Offsetters

Everyone's done carbon, they've done waste, there is this hunger for something new and exciting and now they can actually set a No Net Loss target or a net gain target and actually measure it.

Academics

significant barriers to social inclusion within the design and implementation of Biodiversity Offsetting. They asserted that councils lacked the financial resources to facilitate costly consultation processes (stakeholder forums and referendums) and were instead forced to operate within a mindset preoccupied by policy outcomes, not processes.

Environmental NGOs

my biggest concern throughout this whole process is people haven't been consulted, civil society, has knew nothing about it . . . communities went to those NGOs expecting them to fight to protect local green space, only to then find out they were part of it and they are on their own

"communities are often the experts of the landscape"

Local Authorities

"[Civil society stakeholders] don't have any ecological expertise".

Social justice and equity

- 1] Access to nature
- 2] Intra-/inter-generation equity
- 3] Prior informed consent

Biodiversity Offsetters

Offsetters were less inclined to support the inclusion of social compensation within the Defra metric, suggesting that such issues are, and would continue to be, dealt with implicitly during the scoping and application of offsets with local authorities and via other mechanisms surrounding green infrastructure.

Academics [1/2]

So you've got the habitat and, there is no-net loss [in ecological value], but the benefits are lost to those individual people, that's an equity issue, a social-justice issue the green paper fails to deal with.

We are a small island which is heavily developed with lots and lots of people living very close to each other. I think access to nature is a huge part of the value of the remaining biodiversity. So, I would say, actually yes, it is crucial that Biodiversity Offsetting incorporates considerations of affected communities and access to nature for those affected communities.

Academics [2/2]

Utility value and access to nature or something like that could be made part of the Defra process without too much difficulty

Social compensation attached to ecological compensation would make it prohibitively expensive to offset biodiversity impact retrospectively, driving ". . . the developers to look at more minimization or avoidance measures – which is kind of the point".

Environmental NGOs

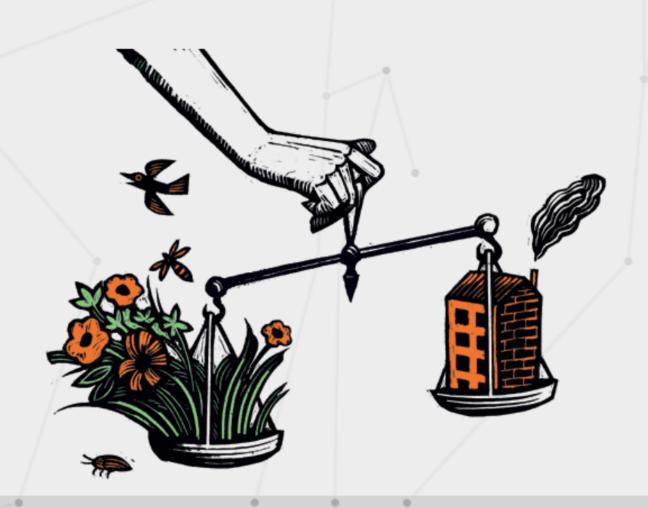
Importance of establishing free prior informed consent with communities in which development was occurring, suggesting that if this criterion is not satisfied: We need to be humble enough to admit that that is not an offset; it's not even a compensation.

Local Authorities

felt the omission of equity concerns from the formal Biodiversity Offsetting process would impose "cultural debts" on current and future generations, in the form of a loss in access to environmental amenities which possess significant cultural, educational and historical value to local people.

Summary

- Biodiversity loss has ecological and social consequences
- Better treatment of social issues (in offsetting, NNL and Net Gain) needed
- Benefits and costs should be treated across separate balance sheets
- Biodiversity units/credits risks conflating values



Other considerations:

Compensation in a world in transition?

- Environmental: Implications of like-for-like compensation
- Political: Siting development + offsets + permanency
- Economic: 'Supply' of offsets: Land-owner perspective

Trade-offs across development and sustainability?

- Need to break-down silos
- · Whole systems accounting

UK within a global context

- Transboundary biomass consumption
- Problem shifting

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