

BSI Flex 702 v1.0:2024-10 Nature markets – Supply of biodiversity benefits – Specification

[British Standards Institution](#)

0 Introduction

There is no mention of climate change, yet the climate and nature crisis are interlinked and require integrated solutions. Mitigating biodiversity loss enhances climate change resilience and combatting climate change helps support biodiversity. Thus, climate change and the interlinkages between biodiversity and climate change should be mentioned in the introduction.

1 Scope

Throughout this section the term ‘nature-based units’ is used. However, this term is not defined in this document nor in BSI Flex 701. Considering the specific focus of BSI Flex 702, clarity may be improved by replacing the term nature-based unit with biodiversity unit.

2 Normative references

Have no specific comments

3 Terms and definitions [3.1-3.14]

3.4 Biodiversity unit, from the current definition it is not clear what is meant by a specific lifetime nor how the unit is measured. Whilst agreeing with NOTE 1 that biodiversity is multi-faceted with no definitive accepted quantitative definition, the absence of further information does raise concern that measuring biodiversity becomes a pick and choose of what offers the best outcome for the user and not biodiversity. Thus far measurements have had to be set out clearly to ensure integrity, for example Biodiversity Net Gain. To ensure beneficial outcomes for biodiversity, a consistent and holistic approach is required.

4 Principles shared across market participants [4.1-4.4]

4.1.1 Despite accounting for the information provided in BSI Flex 701, there is little detail on the requirements to establish a baseline. For example, how many years does a baseline need to capture? More evidence is required to ensure that the land has met minimum requirements. Furthermore, how might it link with the carbon offset market? Especially when considering a single farm record where one baseline covers carbon and biodiversity, making nature markets a more accessible option to pursue.

4.2 There is no mention of below ground biodiversity which to capture sufficiently will involve differing methods to above ground biodiversity.

4.2.3 The metric should not just be tested but also verified. Only verified metrics, metrics that have been officially approved should be used so to maintain integrity.

4.2.4 The mitigation hierarchy is of particular relevance with planning and development and biodiversity net gain, however when considering biodiversity units beyond the biodiversity net gain market one could create a unit on varying areas of biodiversity conditions so long as it can be proven that biodiversity has been enhanced. Solely focusing on low biodiversity or ecosystem condition areas limited biodiversity market opportunity and biodiversity enhancement.

4.2.6 There is little detail on the requirements to establish a baseline is established, e.g. for example number of years of data. More evidence is required to ensure that the land has met minimum thresholds over a specified period of time.

4.2.8 For a baseline to be effective it should be established prior to any activity taking place. Considering, information provided in BSI Flex 701 and 702, there is limited detail on the requirements to establish a baseline e.g. for example number of years of data. Further detail is required.

4.2.10 If biodiversity is a part of the ecosystem service then a separate assessment could result in double counting. Further consideration required for example will there be a hierarchy? If so what with this hierarchy be based on?

Further consideration and information for clarity required.

4.3 To maintain integrity new methods should be tested, verified, and approved before being considered for use.

4.4 The information provided both in this document and BSI Flex 701 is limited. It is understood the environmental benefit from an action can only be sold once. Further

clarification of how this principle works with the stacking of nature-markets units and how it views credits created though bundling is required.

5 Selling units [5.1-5.4]

5.1 Taking into account the information in section 5.2.3 in BSI Flex 701, how the demonstration of additionality will be policed needs to be considered. If the seller does opt to use a third party for verification, consideration in who will be monitoring this needs to take place.

5.2 What mechanisms are in place to safeguard sellers if intended biodiversity enhancements are not realised despite best efforts due to unforeseen circumstances for example extreme weather events and other potential climatic changes over the 30-year period that may impact biodiversity.

5.2.1 *“Plans and actions, underpinned by clear logic and evidence...”* what does clear logic and evidence entail? How will this be proven?

5.3 The importance of performance to adequately tackle the nature crisis is known. However, over 40% of farms are tenanted and a 30-year minimum may pose a significant barrier for tenant farmers. With land being a finite resource, further consideration is required on how best to structure biodiversity unit requirements, so to achieving lasting biodiversity benefits while minimising barriers to accessing nature markets.

5.4.4 Reference to BS 8683:2021 would help clarify requirements regarding who would be best to conduct the surveys.

6 Registries – registry functions

There should be governance to ensure that the standards are checked against international standards and initiatives on an ongoing basis as standards are revised. As well as governance to ensure that there is consistency and joined up thinking between certifying bodies. There is an opportunity to use the registry as mechanisms to achieve this.

No specific registry is mentioned and the word ‘registries’ is used. If multiple registries are used there is concern that though data is captured, there will be no clear oversight which could create issues with double counting and additionality.

