



Call for Input Response: Draft tools and standards before SBM018

About the RSPB

The Royal Society for the Protection of Birds (RSPB) is the largest wildlife conservation charity in Europe. We work with over a million members, businesses, government and civil society partners to tackle the drivers of the nature and climate crises and deliver the actions and investment needed to secure a nature positive and net zero world. Domestically, we work across the countries of the UK on a range of environmental policy issues, while elsewhere we work with our Birdlife International partners to secure positive change globally.

One of our strategic priority areas focuses on fostering a nature positive economy – both by reducing the flows of finance and support for nature-depleting activities, while driving policies, actions and investment that support the recovery of nature for the benefit of people and wildlife. This work cuts across the RSPB's areas of work, from our policy influencing to business advice and from conservation investment and delivery to corporate partnerships.

Response

The Royal Society for the Protection of Birds (RSPB) Nature Markets Section welcomes the opportunity to comment on the draft tools and standards before SBM018, notably the *Common Practice Analysis Methodological Tool* and the *Draft Standard: Addressing Non Permanence and Reversals*.

- **The role for nature-based solutions**

We welcome the development of a global mechanism to create a market to support countries reaching net zero. It is crucial it is developed in a way that supports a high integrity market.

We believe that Nature based Solutions (NbS), in addition to engineering solutions are crucial to this marketplace offering a range of benefits beyond carbon capture. Well-designed and high integrity NbS projects for removing or reducing Greenhouse Gas (GHG) emissions can also generate extensive benefits for biodiversity – assisting in addressing the global biodiversity crisis – and can also provide extensive economic and social benefits for local communities.

We recognise that the operation of Article 6.4 relies on projects generating carbon credits that represent long-term GHG reductions or removals, and that this can in some cases be more challenging to verify for NbS projects than engineering solutions. However, many NbS

carbon codes and standards, and accreditation frameworks such as the Integrity Council for the Voluntary Carbon Market (ICVCM) are taking concrete steps to ensure that the mitigation activities shall be permanent and that projects should have measures in place to address risks of reversal.

We would encourage the Supervisory Body to implement the Article in a way that takes account of the distinctive features of NbS projects and the Codes / Standards and frameworks that oversee them, with a view to ensuring that all projects deliver permanence and address risks of reversal without imposing monitoring and verification requirements which could make positive NBS projects operationally and financially unviable.

- **The issue of permanence**

While nature-based solutions have lower permanence, they are scalable, more affordable and provide co-benefits such as habitat protection, water purification, timber and other goods, etc. When paired with sufficient safeguards to ensure permanence is maximised (e.g. via contracts disincentivising the premature harvesting of newly planted forests), they can be an effective way to reduce atmospheric carbon while protecting nature.¹

- **Extensive benefits of NbS**

Nature-based Solutions are a cost-effective approach to meeting societal challenges that provide multiple benefits for people and the economy. One of the key benefits of NbS is that, by working with natural processes, they can be more flexible, resilient and adaptable than human-engineered solutions.² This means they can play a crucial role in climate change adaptation, reducing the impacts of increasing incidences of severe weather events.

NbS may be designed to address specific objectives such as preventing flooding, improving water and air quality, and mitigating climate change. For example, according to the World Bank, they could deliver 37% of the mitigation needed by 2030 to deliver the targets set by the Paris agreement.³

There is increasing evidence that NbS can be more cost-effective than “grey” infrastructure investments. A recent international review of NbS in mitigating natural hazards found that they were always more cost-effective than engineered solutions in 65% of cases examined, and partially more cost-effective in a further 26%⁴. Another global analysis found that

¹ [ABC: what is permanence? | Arbonics](#)

² <https://www.adlerandallan.co.uk/knowledge/insight/nature-based-solutions-technically-sound-cost-effective-future-water-industry>

³ <https://www.worldbank.org/en/news/feature/2022/05/19/what-you-need-to-know-about-nature-based-solutions-to-climate-change>

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<https://www.sciencedirect.com/science/article/abs/pii/S0048969724046722#:~:text=The%20majority%20of%20studies%20comparing,hazards%20than%20engineering%2Dbased%20solutions>

employing NbS rather than grey infrastructure solutions would reduce aggregate costs by 50% while delivering the same infrastructure service. These projects would also deliver 28% more societal benefits (including for health, nutrition and biodiversity) than grey infrastructure investments.⁵

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⁵ <https://nbi.iisd.org/wp-content/uploads/2021/10/investment-in-nature-close-infrastructure-gap.pdf>