Response to Public Consultation Comments on Nature Integrity Methodology for Biodiversity Conservation and Restoration

Version 1.2

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Response to Public Consultation Comments on Nature Integrity Methodology for Biodiversity Conservation and Restoration

Dear Participants,

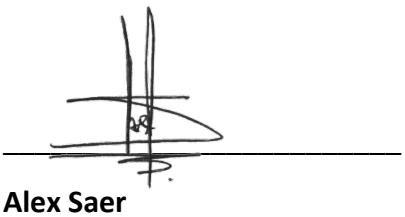
Cercarbono sincerely thanks you for participating in the public consultation on Nature Integrity Methodology (NIM), conducted from September 11, 2026 to October 11, 2026.

Your comments help strengthen the methodology's technical rigor and clarity, providing project proponents and developers with a more consistent framework for implementing biodiversity conservation and restoration projects under Cercarbono's Biodiversity Certification Programme.

This document compiles the comments received during the public consultation, together with the corresponding clarifications and responses prepared by Biodiversity Intelligence.

Thank you once again for the time you dedicated to reviewing the methodology and for your contribution to its improvement.

Sincerely,



Alex Saer
Cercarbono's CEO

No.	Comment	Response
1	**Scope of eligible activities and inclusion of biodiversity-enhancing productive landscapes** **Relevant sections:** 2.1 – Scope; 3 – Eligibility and inclusion requirements The methodology excludes biodiversity improvements to agricultural and other productive activities themselves. While limiting the initial scope may be reasonable during the early development of the methodology, permanently excluding biodiversity-enhancing productive land-use systems could represent a significant missed opportunity. Agroforestry and other biodiversity-friendly agricultural practices can contribute substantially to biodiversity conservation and recovery through increased native tree cover, improved habitat connectivity, greater vegetation diversity, improved soil conditions and reduced pressure on remaining natural ecosystems. These interventions may provide valuable habitats for birds, insects, soil fauna and other biological groups, particularly in heavily modified landscapes. **Recommendation:** Consider establishing a future pathway or complementary methodology for biodiversity improvements in productive landscapes, including agroforestry and biodiversity-friendly agricultural systems. Eligibility could be restricted to interventions that demonstrate measurable ecological improvements beyond conventional production practices, supported by appropriate reference conditions and safeguards against the conversion of natural ecosystems.	**Biodiversity-enhancing productive landscapes — Outside the scope of the NIM** The NIM is deliberately limited to native ecosystems. Native remnants embedded in productive landscapes, such as forest patches, riparian corridors or wetlands within an agricultural matrix, are already eligible (Section 2.1). Biodiversity improvements in productive systems correspond to a different CBCP eligible activity (EA02, Agrobiodiversity enhancement), which requires its own metrics and reference conditions. The methodology proponent is currently developing a specific complementary methodology for biodiversity outcomes in agricultural and productive systems.
2	Selection and feasibility of restoration reference ecosystems **Relevant sections:** 3.1 – Area eligibility; 3.1.1 – Establishment of the reference condition for restoration projects The methodology establishes requirements for selecting an ecologically comparable Reference Ecosystem and allows reconstructed reference conditions where suitable physical reference sites are unavailable. This flexibility is welcome. Nevertheless, additional guidance	**Selection of reference ecosystems and historical periods — Accepted in part** Section 3.1.1 will specify that the ecological unit used to select the Reference Ecosystem shall be identified from an official national or regional ecosystem or vegetation classification. Where none exists, a recognised global framework applies (e.g., terrestrial ecoregions or the IUCN Global Ecosystem Typology), and the source shall be cited in the PMP.

	would be valuable regarding the appropriate geographical and ecological scale for reference ecosystem selection. For example, should reference ecosystems be identified according to established ecoregions, bioregions, vegetation classifications or other recognised ecological units? If so, what is the source that projects should use to identify these units? The choice can substantially influence the reference condition and therefore the calculated biodiversity gains. Another important consideration is the distinction between ecological ambition and realistic restoration potential, and the availability and suitability of historical reference conditions. For example, when restoring savannas or grasslands affected by perhaps irreversible changes in grazing and fire regimes, it may be difficult to determine whether the appropriate reference should represent conditions from e.g. several decades or several centuries ago. In some cases, historical information may simply not exist or historical conditions might have substantially changed. **Recommendation:** Provide more detailed guidance on reference ecosystem selection, historical reference periods and the treatment of climate change and irreversible ecosystem changes. The methodology should distinguish clearly between the desired ecological target and the realistically achievable recovery trajectory, without unnecessarily lowering restoration ambition.	For reconstructed references, the PMP shall justify the historical period selected, document any irreversible changes (e.g., in fire or grazing regimes) and climate-related shifts, and explain how they were considered. The reference condition remains the ecological target and shall not be lowered because of these constraints. The realistically expected recovery trajectory is documented separately, as part of the restoration feasibility assessment. Revision of the reference condition due to broad environmental change remains possible only through the procedure in Section 3.1.1.
3	Demonstration of conservation threats and additionality **Relevant sections:** 3.1 – Area eligibility; 4.1 – Additionality for Biodiversity Conservation Projects; 6 – Baseline scenario Additional guidance would be useful regarding how degradation drivers should be analyzed and documented, and how to demonstrate project additionality. This is particularly relevant given the additionality criticisms that carbon projects have faced in recent years. For example, in forest conservation projects in regions experiencing rapid agricultural expansion, landowners may face considerable economic pressure to sell their properties for	**Demonstration of threats and additionality — Accepted in part** Criterion (b) of Section 3.1 will include illustrative types of verifiable local or regional evidence of threat: conversion rates in comparable unprotected areas, land-market pressure and offers for agricultural use, documented enforcement or protection deficits in protected areas, changing landowner incentives and climate-related degradation risks. It will also state that the absence of a formal deforestation or conversion plan for a parcel does not imply the absence of threats. Other threats, such as fire, illegal hunting, illegal clearing, livestock grazing or unsustainable

	cattle ranching or other productive activities. Although there may be no formal deforestation plan for a specific parcel, the risk of future conversion can be substantial, but this needs to be substantially demonstrated to avoid additionality issues. Additionality is essential to prioritise projects in areas where biodiversity faces the greatest threats or where ecological recovery will not occur without active intervention. **Recommendation:** Provide clearer criteria and illustrative examples for demonstrating threatened biodiversity due to degradation drivers or no recovery under a without-project scenario, including economic land-use pressures, weak enforcement in protected areas, changing landowner incentives and climate-related degradation risks. Guidance should make sure that degradation drivers are well demonstrated whilst allowing some flexibility; e.g. a lack of an immediate deforestation plan does not necessarily imply a low likelihood of future degradation.	resource extraction, may be present and can be documented. In all cases, the threat must be substantiated with evidence. Additionality continues to be demonstrated under Section 6 of the CBCP Protocol, including, for preservation activities, evidence that no other initiative claiming biodiversity credits addresses the same threats (Protocol Section 3.1.3).
4	Counterfactual baselines **Relevant sections:** 4 – Additionality; 6 – Baseline scenario; 6.1 – Proposed procedure; 7.5 – Biodiversity credit calculation The methodology adopts a qualitative, evidence-based counterfactual baseline to establish additionality, while credit issuance is based on measured ecosystem condition rather than quantified avoided biodiversity loss. This is a conservative approach in the sense that it avoids directly rewarding potentially inflated projections of future biodiversity degradation, an issue that has raised substantial credibility concerns in carbon markets. Nevertheless, it also means that projects are not rewarded in proportion to the magnitude of degradation drivers they are addressing, and results in projects operating under very different threat levels generating similar credit volumes when they maintain comparable ecological condition. Additionally, it could help achieve a balance between conservation and restoration projects, specially since the methodology recognizes that the later will generate a lower volume of credits for comparable areas and	**Counterfactual baselines — Partly accepted** The NIM deliberately credits measured ecological condition rather than projected avoided loss, which avoids rewarding potentially inflated degradation scenarios, a concern the comment itself recognises. Credit calculation follows the equations of the CBCP Protocol (Section 16.4), which the methodology applies without modification, so a quantified counterfactual is not incorporated into credit issuance. The recommendation on periodic reassessment is accepted. The baseline and additionality will be reassessed at each renewal of the accreditation period, as required by Section 7.2 of the CBCP Protocol, and whenever a material change in the project or its context occurs.

	time periods. An additional concern is the absence of a clearly defined periodic reassessment requirement for the counterfactual baseline of an unchanged project. This is essential for demonstrating additionality over time, equaling to the importance of conserving/restoring the area for biodiversity. **Recommendations:** – Consider whether quantified counterfactual baselines could eventually contribute to credit calculations, provided sufficiently robust and conservative methods can be developed. Such an approach could better distinguish projects according to their additional biodiversity outcomes, although it would require strong safeguards against inflated baselines, independent validation and appropriate uncertainty treatment. – Introduce periodic reassessment of counterfactual baseline assumptions, potentially aligned with crediting-period renewals or triggered by material contextual changes. This would help ensure that projects continue to demonstrate credible additionality throughout their operational lifespan.	
5	Balance between conservation and restoration credit issuance **Relevant sections:** Introduction; 4 – Additionality; 7.5 – Biodiversity credit calculation The methodology explicitly recognises that conservation and restoration credits represent different biodiversity outcomes and are therefore distinct, non-fungible credit classes. Nevertheless, the substantial difference in credit issuance volumes raises concerns about the relative financial incentives created for conservation and restoration projects. This distinction is particularly relevant because restoration projects often require significant upfront investments, technically demanding interventions and long-term maintenance, while ecological recovery may take decades to become fully measurable. Moreover, restoration projects must demonstrate actual ecological improvements to generate credits,	**Balance between conservation and restoration credits — Noted** Conservation and restoration credits measure different outcomes and are issued as distinct, non-fungible classes, calculated with the equations of the CBCP Protocol (Equations 1 and 2, Section 16.4). The market valuation of each class lies outside the scope of a quantification methodology. However, following consultation with Cercarbono, Version 1.3 changes how restoration credits are accounted for over time, and this narrows the gap the comment describes. At each verification, restoration credits are calculated cumulatively from time zero, as (ECSproj,t − ECSproj,0) × A × months elapsed since time zero, minus the credits already issued, and only when the project ECS exceeds the highest value previously used for credit issuance. Restoration projects are thus credited for the full time since their start, and the cumulative approach prevents systematic

	whereas conservation projects receive credits for maintaining existing condition against a documented but unquantified risk of deterioration. Although the two credit classes are not directly comparable and may command different market prices, the methodology does not guarantee that lower restoration credit volumes will be compensated through higher prices. This could create disproportionate financial incentives favouring conservation over restoration, despite restoration projects delivering measurable ecological gains. **Recommendation:** Further assess the implications of the different crediting formulas for project financial viability and investment incentives. One potential approach to achieve a more balanced situation would be to incorporate quantified counterfactual baselines into credit calculations, thereby linking issuance more directly to additional biodiversity outcomes under both pathways.	differences in credit volumes arising solely from the frequency of verification. Quantified counterfactuals are not incorporated into credit calculation, for the reasons given under comment 4.
6	Historical ecosystem degradation and the restoration of severely altered sites **Relevant sections:** 3.1 – Area eligibility and target ecosystem The methodology appropriately seeks to prevent restoration activities from replacing existing native ecosystems. This is particularly important for mangrove projects, where planting in naturally open intertidal habitats could damage valuable mudflats, salt marshes or other native ecosystems. However, identifying the original ecosystem can sometimes be challenging where degradation occurred several decades or centuries ago and historical ecological information is limited. For example, areas currently dominated by grasslands may have historically supported mangrove ecosystems, but the available satellite imagery or land-use records may not extend far enough back to demonstrate the transition. Evidence from soils, altered hydrology, invasive species dominance and remnant vegetation may suggest historical mangrove occurrence even where direct documentation is unavailable. An additional concern is that the ecosystem-specific eligibility criteria for native forest	**Historical degradation and severely altered sites — Accepted in part** Section 3.1 will allow the original native ecosystem to be identified through converging lines of evidence, such as soils, hydrology, remnant vegetation, historical records and regional ecosystem maps, where imagery or land-use records are insufficient. The restoration potential of native forests will make clear that native propagules may be introduced through active interventions (e.g., nursery stock or direct seeding) and do not need to be present on site. Under the NIM, only native species may be used in restoration, including in the initial rehabilitation of severely degraded sites; non-native species, even temporary or non-invasive ones, are not permitted. Sites must still meet the Protocol's five-year exclusion for recent degradation or transformation (Section 3.1.6) and demonstrate restoration feasibility.

	restoration may exclude severely degraded sites, such as former mining areas, where soils have been heavily disturbed and native propagules are no longer available within the project area, despite ecological restoration remaining technically feasible through appropriate interventions. While restoration feasibility is essential, such exclusions may prevent investment in landscapes where ecological and social benefits could be particularly substantial. Additionally, in some cases, recovery may require an initial rehabilitation phase before native ecosystem restoration becomes feasible. For example, temporary use of suitable non-native species for phytoremediation facilitates subsequent establishment of native vegetation, provided this does not create additional ecological risks. **Recommendation:** Consider allowing more flexibility for restoration of very degraded sites when restoration feasibility is demonstrated and for the restoration approach. This could permit temporary, controlled interventions where they are demonstrably necessary to enable native ecosystem recovery, subject to safeguards against invasiveness and a clear, time-bound transition towards the intended native ecosystem.	
7	Broader recognition of degradation drivers and restoration interventions **Relevant sections:** 3.1 – Ecosystem-specific restoration eligibility criteria For forest restoration, invasive woody species are explicitly mentioned as an indicator of degradation. However, herbaceous invasive or aggressively expanding species can also severely inhibit natural regeneration. For example, dense stands of elephant grass in degraded tropical landscapes may suppress tree establishment and prevent recovery of native vegetation. Similarly, mangrove degradation evidence may result not only from changes in cover, substrate or hydrology, but also from unsustainable resource-use practices. Fishing techniques that damage propagules, excessive grazing and poorly managed oyster harvesting can interfere with natural regeneration and ecosystem functioning.	**Degradation drivers and restoration interventions — Accepted** The illustrative degradation evidence will be broadened to include invasive or regeneration-suppressing species regardless of growth form, such as dense stands of aggressive grasses that prevent tree establishment. For mangroves, it will include unsustainable resource-use practices that impair regeneration, such as fishing techniques that damage propagules, excessive grazing and poorly managed shellfish harvesting.

	Recommendation: Broaden the illustrative degradation criteria to explicitly include invasive or regeneration-suppressing species regardless of growth form, as well as unsustainable resource-use practices that impair ecological recovery. This would better reflect the diversity of pressures affecting native ecosystems and support more context-specific restoration strategies.	
8	Feasibility and proportionality of biodiversity monitoring requirements **Relevant sections:** 7.1.2 – Minimum requirements per ecosystem; 7.2.1 – Compositional component; 11 – Monitoring plan The requirement to monitor at least four representative biological groups provides a scientifically valuable basis for assessing ecosystem condition across complementary ecological dimensions. However, the associated monitoring effort may be prohibitively expensive for many projects, especially in regions with limited resources. Monitoring several biological groups using appropriate methods requires specialised personnel which might be challenging to find in under-developed countries, equipment, and repeated extensive field campaigns, which is costly. The additional requirement to obtain comparable data from reference ecosystems can further increase costs and restrict viability, especially where reference sites are remote, managed by third parties (also e.g. in a different country) or subject to access restrictions. These requirements may be particularly challenging for small-scale projects, community-led initiatives and projects in countries with limited biodiversity monitoring infrastructure. There is a risk that the costs of monitoring and verification could exceed the financial benefits expected from biodiversity credit issuance, especially at such moment of incipient biodiversity credit markets and very limited demand, thereby limiting participation to projects in well-resourced regions and exclude highly biodiverse landscapes in the Global South where nature investment is most urgently needed.	**Feasibility and proportionality of monitoring — Accepted in part** The minimum of four biological groups is retained, as it is the basis for a robust compositional component that does not depend on any single group. The NIM already offers several ways to reduce costs: – 1–PDF based on presence/absence data where defensible; – remote sensing, UAVs, eDNA, acoustic and camera-trap methods with ground truthing (Section 11.4); – community-based monitoring, triangulated with independent data (Section 11.2); – reconstructed reference conditions where physical reference sites are inaccessible (Section 3.1.1). The PMP's pre-established verification schedule also allows monitoring effort to be aligned with the expected pace of change. A short paragraph summarising these cost-efficient options will be added to Section 11. A reduced initial monitoring phase is not adopted, because the time-zero measurement is the fixed reference for all later crediting and must be complete.

	Recommendation: Consider introducing greater flexibility, e.g. including the use of validated proxies, remote sensing, and community-based monitoring surveys. A reduced initial monitoring burden, followed by progressively more comprehensive assessments as project financing and monitoring capacity develop, could also be explored. Such flexibility should be accompanied by appropriate uncertainty adjustments and independent verification to maintain credibility.	
9	Relative importance of biological composition and ecosystem structure **Relevant sections:** 7.2 – Components and indicators of ecosystem condition; 7.2.2 – Structural component; 7.3 – Calculation of the Ecosystem Condition Score The inclusion of both biological composition and ecosystem structure is a significant strength of the methodology. However, the greater emphasis placed on biological composition, including its higher weighting in the ECS calculation and mandatory requirements (4 groups vs. high flexibility on structure indicators, may lead to an underrepresentation of important aspects of ecosystem structure in the overall assessment of ecological condition. Ecosystem structure is fundamental to biodiversity conservation and restoration. Habitat connectivity, vegetation stratification, canopy complexity, deadwood availability and other structural characteristics influence the availability of ecological habitats and the capacity of ecosystems to support diverse biological communities. Furthermore, ecological structure may recover or respond to management interventions before changes in species composition become measurable. In highly degraded landscapes, restoring habitat structure can be an essential prerequisite for the subsequent recolonisation of native species. Additionally, in the context of climate change, historical species assemblages may not always recover fully, even where restoration successfully re-establishes structurally complex and ecologically functional habitats. A	**Composition and structure — Clarified and accepted** The 0.60/0.40 weighting is not intended to represent a universal empirical relationship, but rather a methodological decision. Greater weight is assigned to biological composition because it more directly reflects actual biodiversity gains, whereas some components of habitat structure, although relevant, can be increased through targeted actions without necessarily resulting in an equivalent improvement in biodiversity. The weights are fixed ex ante for all ecosystems, to ensure comparability and prevent post-hoc adjustment, and will be reviewed within five years of approval, or earlier if data from registered projects justify it. The recommendation on structural indicators is accepted: the structural set for each ecosystem shall cover, at minimum, habitat extent, connectivity and internal structural complexity, unless the PMP justifies that a dimension is not ecologically applicable.

	strong emphasis on reproducing reference species composition could therefore underestimate meaningful improvements in ecosystem integrity. **Recommendations:** – Provide a clearer scientific justification for the relative weighting of composition and structure, and consider whether ecosystem-specific weighting or alternative aggregation approaches may be appropriate. – Strengthen the minimum requirements for structural indicator selection by identifying key dimensions that should be considered for each ecosystem, such as habitat extent, connectivity and internal structural complexity. Not every indicator needs to be mandatory in every ecosystem, but the representation of ecologically important dimensions to overall compositional biodiversity is key.	
10	Treatment of ecological variability and measurement uncertainty **Relevant sections:** 7.2.1 – Compositional component; 7.5 – Biodiversity credit calculation; 11 – Monitoring plan; 14 – Information management The methodology requires uncertainty to be documented and considered when interpreting ecological condition. However, it does not prescribe a specific statistical estimator or decision rule. This flexibility may lead to inconsistent interpretations across projects and verifiers. **Recommendation:** Provide more detailed requirements for uncertainty estimation, including recommended statistical approaches, acceptable precision levels and maximum uncertainty thresholds.	**Ecological variability and measurement uncertainty — Clarified** Because suitable estimators differ widely among ecosystems, biological groups and sampling designs, the NIM does not prescribe a single statistical method or a universal uncertainty threshold. It already requires the PMP to define, before time zero, the statistical approach and treatment of uncertainty, a target precision and a minimum detectable change for each principal indicator (Section 11.2), all subject to approval by the Independent Expert Panel. The PMP must also set the criterion and method used to assess trend and stability (Section 7.5). New decision rules on missing data and method changes (no imputation; parallel calculation with the more conservative result) further limit inconsistent interpretation.
11	Flexibility in project duration and verification intervals **Relevant sections:** 5.1 – Temporal limits; 11.1 – Scope and duration The minimum 40-year operational lifespan reflects the long-term nature of biodiversity conservation and ecological recovery. Such a commitment is ecologically justified, particularly for restoration projects where meaningful improvements may take several	**Project duration and verification intervals — Accepted (duration), clarified (verification)** The minimum operational lifespan is reduced from 40 to 30 years. It remains a binding long-term commitment for monitoring, management and tenure obligations. The maximum verification interval of 36 months is retained, consistent with the Programme requirement to verify at least once every three years in order to renew the accreditation period

	decades. Nevertheless, the biodiversity credit market remains at an early stage, and a mandatory 40-year commitment may discourage participation by project developers, landowners and local communities. This could be particularly challenging for projects implemented on community-managed land, where long-term contractual obligations may create concerns about future land-use flexibility and intergenerational commitments. A shorter minimum duration, for example 30 years, could potentially lower barriers to participation while still requiring substantial long-term commitments. The maximum three-year verification interval may also create financial and operational challenges. For example, for restoration projects, ecological recovery is often slow during the initial years, particularly in native forest restoration. Frequent verification during periods when limited measurable improvement is expected may not be cost-effective. **Recommendation:** Consider greater flexibility in project duration and verification frequency, supported by risk-based requirements. For example, restoration projects could be allowed longer verification intervals during early implementation, potentially up to five years, followed by more frequent verification once measurable ecological recovery is expected.	(CBCP Protocol Section 7.2). Within that limit, the PMP shall include a pre-established verification schedule based on the project's monitoring design, while accreditation-period renewals follow the applicable CBCP requirements (Section 5.1). Because restoration credits are now calculated cumulatively from time zero, the frequency of verification does not by itself create systematic differences in the volume credited, so projects can verify according to the expected pace of ecological recovery without financial penalty.
12	Recognition of projects initiated before biodiversity credit certification **Relevant sections:** 4 – Additionality; 5.1 – Project start date and temporal limits The methodology defines the project start date as the first direct on-the-ground action initiating attributable biodiversity outcomes. However, it would be useful to clarify whether projects that began implementing conservation or restoration activities before seeking biodiversity credit certification may be eligible. Many existing nature-based projects may have been established primarily for carbon finance but be generating also biodiversity outcomes and struggling to continue/expand activities due to limited funding. Where historical monitoring data are available, these	**Projects initiated before certification — Accepted, with conditions** Section 7.1 of the CBCP Protocol allows retroactive recognition of conservation efforts undertaken within the five years prior to the project start. Under the NIM, this is possible only where a complete historical ECS measurement exists that meets all requirements of the methodology: at least four biological groups, the approved structural indicators, an approved reference condition and demonstrated sampling sufficiency. That measurement becomes the project time zero, from which elapsed time is counted for crediting, and no outcome before it is attributed to the project. The project must also demonstrate additionality under Section 6 of the Protocol, disclose all existing financing and prior environmental-credit

	projects could potentially demonstrate credible ecological outcomes and contribute to the biodiversity credit market. **Recommendation:** Clarify whether retroactive project start dates or retrospective crediting are permitted, and under what conditions. Any such provisions should require adequate historical data, demonstrable additionality, transparent disclosure of existing financing and safeguards against double issuance of previously claimed outcomes.	claims on the area, and demonstrate that no outcome is issued or claimed twice (Section 4.4).
13	Stacking biodiversity credits with carbon credits and other environmental finance **Relevant sections:** 4.3 – Compatible income-generating activities; 4.4 – Stacking and bundling; 5.2 – Spatial boundaries The methodology permits stacking or bundling environmental credit claims where transparent boundaries, documented consent and safeguards against double counting are established. This is a welcome provision, but more detailed operational guidance is needed, specially in a context of high skepticism about double counting. In such incipient state of the biodiversity credit markets, lack of detailed guidelines on this can deter project developers from following this approach and discourage buyers pursuing combined outcomes. The relationship between carbon and biodiversity credits is particularly important for nature-based projects, where the same conservation or restoration interventions may simultaneously deliver climate and biodiversity benefits. **Recommendation:** Develop detailed guidance and practical examples for stacking and bundling. The guidance should clarify the distinction between overlapping activities and double counting of environmental outcomes, how additionality is assessed where multiple revenue streams contribute to project financing, and how claims and benefits should be transparently allocated. Clearer provisions would increase confidence among project developers and buyers while facilitating investment in high-integrity native ecosystem conservation and restoration.	**Stacking with carbon credits and other finance — Accepted in part** Section 4.4 will be rewritten in line with Section 15.2 of the CBCP Protocol. Bundling of carbon and biodiversity credits is not permitted. Stacking of biodiversity activities on climate-mitigation projects is permitted under the Protocol's conditions; where the mitigation project is registered with Cercarbono, its validated mitigation activities constitute the baseline of the biodiversity project. The PMP must declare all overlapping environmental-credit claims on the area (programme, registry identifier, area, period and claimed outcome) and demonstrate that the same biodiversity outcome is not issued, claimed or attributed more than once; consent alone is not sufficient. Where several revenue streams finance the project, additionality is assessed under Section 6 of the Protocol, including financial analysis where required. Broader guidance and worked examples on stacking across programmes are a Programme-level matter, which we refer to Cercarbono.
14	**Indigenous rights, customary tenure and historical land-use conflicts**	**Indigenous rights, customary tenure and land-use conflicts — Accepted**

	Relevant sections: 3.2 – Ownership; 5.2 – Spatial boundaries; 12 – Safeguards; 13 – Stakeholder consultation The methodology includes important provisions concerning collective, customary and Indigenous tenure, meaningful participation in project governance and fair, transparent benefit-sharing arrangements. It also requires compliance with Cercarbono's Safeguarding Principles and Procedures. These requirements are positive and should be retained. However, additional guidance is needed regarding projects located in areas affected by historical or ongoing land-tenure and natural-resource-access conflicts. Furthermore, conservation projects can inadvertently reinforce historical exclusion or dispossession if project boundaries, access restrictions or benefit-sharing arrangements are established without adequately considering customary rights and historical grievances. **Recommendation:** Introduce explicit requirements for identifying and assessing historical and ongoing land-tenure, customary-use and resource-access conflicts before project validation. These assessments should consider both formal legal rights and legitimate customary claims, including situations where such claims have not been formally recognised by national authorities. Projects involving unresolved conflicts should be subject to more in-depth due diligence, meaningful consultation and appropriate Free, Prior and Informed Consent (FPIC) processes, together with accessible grievance mechanisms and clear procedures for conflict resolution. The methodology should also clarify the circumstances under which unresolved disputes may prevent project validation or require the exclusion of affected areas until adequate safeguards and agreements are in place.	Section 3.2 will require the PMP to identify and assess, before validation, historical and ongoing conflicts over land tenure, customary use and access to natural resources in the project area. The assessment covers both formal legal rights and legitimate customary claims, including claims not formally recognised by national authorities. Where such conflicts exist, the project shall carry out enhanced due diligence, meaningful consultation and, where applicable, free, prior and informed consent, and shall provide an accessible grievance mechanism, in accordance with the Safeguarding Principles and Procedures. Areas subject to material unresolved disputes shall be excluded from the eligible area until adequate agreements and safeguards are in place.
15	Risk assessment, permanence and reversal management **Relevant sections:** 9 – Risk identification and management; 11 – Monitoring plan Risk identification and management are fundamental to the credibility and long-term	**Risk, permanence and reversals — Accepted in part** Reserves and reversals are governed at Programme level. Under Section 7.3 of the CBCP Protocol, 5% of issued VBCs are allocated to the Long-term Reserve and 5% to the Guarantee

	success of biodiversity projects. However, the current guidance remains relatively broad and would benefit from more detailed, standardised procedures. Greater clarity is particularly important regarding how identified risks should influence credit issuance, financial reserves and responses to reversals. The methodology refers to buffers and technical reserves, but the operational rules for determining their size and applying them could be more explicit. **Recommendations:** – Develop a standardised risk assessment framework and template, including risk categories, likelihood and severity criteria, mitigation requirements, reassessment frequency and procedures for responding to material changes in risk. – Consider establishing a risk-based biodiversity credit buffer or technical reserve, with contributions proportionate to project-specific permanence risks. – Clear procedures should also specify how buffers are used following verified reversals and how previously issued credits are treated where biodiversity outcomes are no longer maintained.	Buffer, and their use after verified reversals follows the Protocol and the CBCP Procedures. The NIM will state that the VBCs calculated with its equations are gross units subject to these reserves, and will rename its own "technical reserve" as a project "contingency reserve" to avoid confusion. Risk assessment in Section 9 will become methodology-specific. It must cover, at minimum, the threats documented under eligibility criterion (b), identify the indicators expected to reflect each threat, and be linked to the condition rules of the methodology: – suspension of conservation crediting below an ECS of 0.9, with mandatory corrective actions; – a root-cause analysis and corrective plan whenever a biological group or structural indicator declines beyond the minimum detectable change; – the highest-previously-credited rule for restoration gains. A standardised risk template and a project-specific, risk-based buffer are not introduced in the methodology, as these are Programme-level instruments.
16	Leakage assessment **Relevant sections:** 10 – Project leakages The methodology appropriately recognises that conservation and restoration projects can generate both positive and negative impacts beyond their geographical boundaries. It also acknowledges the risk that restricting productive activities within a project area may displace those activities elsewhere, potentially causing biodiversity loss outside the project. However, the guidance could be strengthened by establishing clearer procedures for identifying, quantifying and addressing material negative leakage. This is particularly important, since projects that cause no leakage or effectively address leakage (and demonstrate it) should be rewarded. **Recommendation:** – Develop more explicit leakage assessment requirements, including criteria for defining relevant leakage assessment types and	**Leakage assessment — Noted** The NIM keeps its risk-based approach to leakage in this version. Proponents must assess the magnitude and likelihood of positive and negative leakage for their activity type and land-use context, document this in the PMP and, where the risk is material, implement and monitor a proportionate management plan. No deduction or credit adjustment, positive or negative, is introduced at this stage. The methodology proponent is developing a dedicated leakage analysis tool to support the definition of assessment areas and a more quantitative treatment of leakage. Once tested, it will be incorporated through the CBCP procedures for methodology updates.

	areas. – Where material negative leakage is detected, the methodology should clarify whether and how it affects credit issuance, including potential conservative deductions or other corrective measures. Likewise, projects that cause no leakage or effectively address it should be rewarded.	
17	Clarity and consistency of technical equations and definitions **Relevant sections:** 7.2.1 – Compositional component; 7.3 – Calculation of the Ecosystem Condition Score The methodology provides a structured set of equations for calculating biological composition, ecosystem structure and the overall Ecosystem Condition Score. For ease of interpretation and implementation, all equations should be accompanied by complete and consistent definitions of their parameters. For example, Equation (1), which calculates Mean Species Abundance, would benefit from a clearly presented legend specifying the meaning and units of each variable. Although some variables are explained in the accompanying text, consistently formatted equation legends would make the methodology more accessible to project developers, monitoring specialists and independent verifiers. **Recommendation:** Include a standardised legend immediately below each equation, defining every parameter and its units.	**Equations and definitions — Accepted** A standardised legend will be placed immediately below each equation, defining every parameter and its units.
18	The methodology should distinguish between how often patrols take place and how often patrol activity is reported. Quarterly reporting may summarize monitoring data, but quarterly patrols are not frequent enough to enforce a reef closure or reliably deter illegal fishing. In our experience, effective enforcement requires patrols to take place daily or at least once every two weeks, with the frequency set according to the level of threat and the size and accessibility of the closure area. We have incorporated geolocation-tracked reef-closure patrol operations into our methodology. Time-stamped location and route records can show	**Patrol frequency and reporting frequency.** We agree that these are different things. The reference to “quarterly patrol reports” in Section 11 (Monitoring frequency and timing) is an example of how often patrol data are reported. It does not set how often patrols should take place. The methodology does not prescribe a patrol frequency, because effective enforcement depends on the level of threat and on the size and accessibility of the area, as you note. These are defined for each project in the Project Management Plan (PMP). **Patrols as project actions.** Under the NIM, enforcement and patrolling are recognised area-

	whether patrols took place, which parts of the closure they covered, and whether they responded to reported incursions. We recommend that the Nature Integrity Methodology recognize geolocation-tracked patrol records as auditable evidence of conservation response and project implementation. The Project Management Plan should specify patrol frequency, coverage, data quality controls, incident recording and follow-up, and how patrol records will be independently checked and compared with ecological monitoring. These records can help demonstrate that protection activities were carried out in the credited area and address a documented threat. They should support attribution and verification alongside measured ecosystem outcomes, rather than serve as a substitute for those outcomes or as a standalone basis for calculating credits.	based project actions. Section 3.3.1 lists enforcement among the core conservation activities that the PMP must specify for a Biodiversity Conservation Project. Section 5.1 gives the start of enforcement patrols as an example of the first on-the-ground action that sets the project start date. These actions are documented in the PMP, implemented within the eligible area, and checked by the Independent Expert Panel at each verification. **Patrol records as auditable evidence.** The NIM already requires projects to monitor and report three linked categories of indicators (Section 11): 1. Ecological outcomes, which make up the compositional (Ccomp) and structural (Cstr) components of the Ecosystem Condition Score. 2. Pressure and response indicators. 3. Governance and social-safeguard indicators. Categories (ii) and (iii) are mandatory parts of the PMP, but they do not enter the ECS calculation. Their role is to support attribution and adaptive management, alongside the measured ecological outcomes rather than in place of them. This matches your recommendation that patrol records should support attribution and verification, not serve as a standalone basis for crediting. Geolocation-tracked patrol records, with time-stamped locations and routes, are suitable evidence within this framework. The methodology is technology-neutral, so projects can use them as their response indicators. In line with your suggestions, the PMP should specify: – patrol frequency and how it relates to the documented threat; – spatial coverage of the credited area; – data quality controls; – how incidents are recorded and followed up; – how patrol records are compared with the ecological monitoring. Section 11 also requires data collected by project participants to be triangulated with independent sources or verified by a third party. This applies equally to patrol records.