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March 5, 2018

Ms Cristiana Paşca Palmer,
Executive Secretary,
Secretariat of the Convention on Biological Diversity,
United Nations Environment Program

Dear Ms Cristiana Paşca Palmer,

It is my pleasure to submit relevant information to the Convention on Biological Diversity to inform the topic "Mainstreaming Biodiversity within and across sectors and other strategic actions to enhance implementation," planned as agenda item 5 for the second meeting of the Subsidiary Body on Implementation to be held this year in Toronto.

The submission has two parts. The first part is a summary of lessons learned as part of a three-decade engagement at the intersection of business and biodiversity. The second part contains several case studies from five white papers outlining the successful implementation of biodiversity programs in the industry sectors under consideration at the 14th Conference of the Parties (COP14.)

The Wildlife Habitat Council's unique perspective on corporate engagement with conservation has been formed following 30 years' experience across industry sectors advancing a model that marries voluntary conservation efforts with a standard for recognition called Conservation Certification that currently recognizes over 600 conservation programs worldwide in industry sectors including energy and mining, infrastructure, manufacturing and, processing.

While WHC's model is unique, it is also accessible and replicable and can be easily deployed to bridge the gap between planning and implementation which is one of the greatest challenges to biodiversity health.

If you have any questions about our work, our experiences or the company's that are engaged with us, please do not hesitate to contact me. I am happy to expand on our experiences in any appropriate forum.

With best wishes,


Margaret O'Gorman
President



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Submission to Ref.: SCBD/MCO/AF/ML/GD/86933 dated 25 January 2018
Mainstreaming of biodiversity and other strategic actions to enhance implementation

Submitted by: Margaret O’Gorman, President, Wildlife Habitat Council, mogorman@wildlifehc.org

Submission date: 05 March 2018

Title: **Mainstreaming of Biodiversity Into the Sectors: Case Studies and Practical Examples**

Contents:

1. Wildlife Habitat Council – 30 Years Working with Industry
2. Business Drivers
3. A Framework Versus A Tool
4. The Commonalities
5. Existing Challenges and Opportunities

1. Wildlife Habitat Council – 30 Years Working with Industry

The Wildlife Habitat Council (WHC) has worked at the intersection of business and biodiversity for 30 years. In that time, it has developed a method of mainstreaming biodiversity into industry that does not rely on industry- or nation-specific tools, policies and practices. Instead, it creates a framework focused on the specific corporation that recognizes the needs of: corporate leadership to report positive outcomes; operations managers to support non-essential activities; and employees and community members to engage in meaningful ways that meet both ecological and social goals.

This framework requires a company to define a business need for biodiversity management. It also encourages a company to develop a strategic corporate conservation plan that outlines biodiversity objectives, assigns resources to biodiversity implementation, and develops KPIs for biodiversity reporting focused on action. By aligning conservation efforts with a business need, biodiversity evolves from an arm’s-length philanthropic activity to an integrated, scalable company-wide program.

WHC works across industry sectors and international boundaries applying the same approach and framework regardless of local governance, operations type or ecoregion. With this approach, it has recognized over 600 programs in 19 countries from 100 global and national corporations with WHC Conservation Certification, the only voluntary sustainability standard designed for broad-based biodiversity enhancement activities. While Conservation Certification is a site-specific standard, its strength lies in its value as a consolidated metric for corporate reporting.

The design of Conservation Certification as a consolidated metric increases its use as a mainstreaming tool by providing flexibility to all land uses and all industry sectors. For example: a company with a value chain that stretches from large extraction facilities through mid-sized production and smaller distribution venues can use the standard at all facilities. In doing so, this changes the corporate perception of biodiversity management from being the exclusive purview of upstream extractive operations to instead being applicable to all locations. While the biodiversity impact at the larger landscape scale may be greater, the participation of all parts of the value chain leads to mainstreaming which results in institutional engagement over one-off, unique projects.

2. Business Drivers

WHC has identified 16 drivers for business to engage in mainstreaming biodiversity. These drivers are beyond compliance and can be organized mostly within a Corporate Social Responsibility (CSR) paradigm and associated business expectations recently emerged from 21st century concerns for human health and the environment.

The primary drivers of biodiversity within a CSR paradigm are social license to operate and, its close relative, government relations. Social license to operate can be secured through community relations. This may include education activities that meet corporate priorities for workforce development to hire and sustain engaged employees, especially through increasingly frequent post-merger and acquisition integration. These approaches can then provide a positive key performance indicator (KPI) for reporting and disclosures activities that may be leveraged to address activist shareholders and the needs of socially responsible investment funds.

In addition, and as an outcome of increased expectations of business in the 21st century, biodiversity is increasingly being incorporated into risk management which has evolved beyond traditional economic risks to a focus on non-traditional environment, social and governance risk that now promote enhanced approaches to biodiversity in both new and ongoing operations. The result is better reclamation and remediation outcomes that incorporate nature-based solutions and result in significant cost savings.

The starting point to mainstream biodiversity into industry is the business driver and clarity around the value of biodiversity within a business context. Fostering understanding by corporate leaders that biodiversity management efforts meet business challenges and opportunities is an effective and proven way to advance biodiversity actions and goals. When biodiversity management is seen to contribute to a solution it is viewed in a more favorable manner and resources are allocated to it. Once biodiversity management becomes part of a corporate KPI, mainstreaming has occurred, leading to subsequent improvements and significant expansion of efforts.

3. A Framework Versus A Tool

Once the business driver and the value of biodiversity has been recognized, a framework for action and mainstreaming can be built. By building a simple framework to mainstream biodiversity, corporations can then deploy the variety of tools available like valuation systems, spatial planning approaches, strategic environmental assessments, offset strategies and the mitigation hierarchy. A framework must also be the starting point for direct action and implementation. In addition, implementation within this business value framework can be used to report on objectives and impacts in line with the variety of

existing global, regional and local goals including the global Strategic Development Goals (SDGs), national biodiversity targets or regional and other ecological targets.

In short, the business driver approach recognizes the corporation as the organizing unit for action and allows external tools, policies and measures to be embraced and implemented appropriate to the specific context.

CEMEX, a global leader in the building materials industry, embraced the framework approach by working with partners towards different ecological impacts. CEMEX partnered with Bird Life International to develop a Biodiversity Action Plan Guidance which is being advanced at pilot sites in areas of high biodiversity value in five countries. It then partnered with WHC at locations not considered to be of high biodiversity value. At these locations, CEMEX overlaid a biodiversity theme to its education and outreach efforts and integrated its biodiversity management with its award-winning community outreach efforts. To date 24 CEMEX facilities are implementing conservation actions and associated education programs across the Americas. By creating a biodiversity framework and linking it to business value, CEMEX has mainstreamed biodiversity in an inclusive and sustainable manner.

Freeport McMoRan created a framework for mainstreaming biodiversity by adopting a corporate by enabling action on its corporate commitment to the environment that is expressed in different ways at different locations. The basis for the commitment is to be compliant with all required rules and regulations but to go beyond compliance where practicable to enhance the quality to the environment where the company operates. The company's policy commits Freeport McMoran to contributing to the conservation of biodiversity and is aligned to International Council on Mining and Minerals 10 Principles. This integration has seen biodiversity action in restoration, reclamation and remediation projects as well as in corporate citizenship community outreach and education efforts. By creating the framework, Freeport McMoRan allows action to cascade from corporate commitment to community impact.

4. The Commonalities

Across all industry sectors, a set of commonalities make the approach possible and replicable. Most every company regardless of industry sector consists of leaders, employees and stakeholders and follow a similar path of planning, design, execution and measurement on processes both large and small. All companies operate in a community, impact the land and use the resources, and each has a business reason to engage in biodiversity management. These commonalities depress the importance of state actors and make voluntary conservation action possible regardless of local governance.

General Motors (GM), the global automotive manufacturer, embraced these commonalities to mainstream biodiversity across its operations. GM following an industrial benchmarking exercise and stakeholder input developed a global sustainability goal to engage all of its manufacturing facilities in biodiversity programs by 2020 and is currently on track to meet this goal. The goal intersects with GM's employee engagement and community outreach goals and feeds into its reporting on the SDGs.

By embracing the commonalities, GM successfully rolled out a global program of biodiversity management that has to date engaged 71 facilities in 14 countries under one biodiversity metric. While using the framework approach, GM allowed different operations to adopt appropriate tools and approaches that would be locally relevant and increase odds of success and contribute to a global effort. So successful is GM's approach that when GM divested itself of its Opel/Vauxhall brand, the new

company continued to embrace its GM-inspired biodiversity efforts despite the loss of GM resources to support them.

In U.S. state of Michigan, **DTE Energy**, a regional utility company with generation, distribution and office locations in the city of Detroit, embraced the commonalities of place to engage different parts of the operations in biodiversity management efforts. In underserved urban neighborhoods of Detroit, greening efforts around office locations help improve community aesthetics but also storm-water management. At power plants in industrial neighborhoods, biodiversity programs enhance the environment for the community and create ecological connectivity. By enabling such projects at office locations, power plants, service centers and compressor stations, DTE mainstreams biodiversity into its operations, and in recent years, pushed its supply chain to make the same effort. The business value of DTE Energy's biodiversity management is integrated into the DTE mission to be a key element in Michigan's economic and environmental future.

5. Existing Challenges and Opportunities

The main challenge to mainstreaming biodiversity in industry sectors is the continued promotion of tools over frameworks. When specific tools are being promoted as the only solution to address corporate biodiversity needs, the tool will be adopted - but its adoption will not drive mainstreaming as other operations will be excluded from the tool's implementation. It is only by understanding the needs of the specific organization will biodiversity be mainstreamed. Showing a company how it can leverage its biodiversity work to meet a business challenge and allowing it to build a supporting framework within which appropriate tools are deployed will create the circumstances for success.

The promotion of tools over frameworks is frequently driven by competition between civic society groups seeking to secure contracts of work with the corporate sector without acknowledgement that the tool is not comprehensive and will not meet the needs of the entire company. Articulation of the limitations of tools and processes is critical for success in mainstreaming biodiversity. Recognition of the value of a *suite* of tools and approaches within a single business-focused framework remains an opportunity not yet fully realized.

Other challenges remain as follows:

- **The tyranny of metrics and the complexification of conservation** – The tools and practices being advanced by large international nongovernmental organizations (NGOs) and government development agencies remain beyond the reach of corporations that are not included on annual lists of top 500 companies by revenue. The tools require resource investments not available to all companies, and prescriptions for implementation tend to be academic in tone and not reflective of the operating environment. In addition, the fixation on complex metrics and the collection of data to support such metrics can be a significant barrier to entry.
- **The competing priorities of national and state government entities** – WHC has long recognized what it has termed “the unintended consequences of good behavior” which sometimes result when business improves its land stewardship with conservation-focused activities that are permitted and promoted by the government agency which governs natural resources management, and are then viewed in a less favorable light by agencies focused on

regulatory compliance. Since compliance generally trumps non-essential operations, efforts at conservation stewardship can easily be discouraged.

Opportunities exist to address these challenges especially with the current focus on mainstreaming in the industry sectors under consideration. At the national level, efforts must be undertaken to impress on government agencies the need to amplify NBSAPs outside of natural resources agencies and impel regulatory agencies to support the objectives of NBSAPs and understand the implications of their own regulations on biodiversity management. In many regulatory frameworks, the economic impacts of new regulations are expressed when regulations are developed, the environmental impacts should also be expressed in relation to NBSAPs.

Within the NGO community of practice, the need for pragmatic partnerships focused on the reality of operations beyond the C-suite is critical. High level “exclusive” partnerships that, while attractive to C-suite leadership, effectively tie the hands of local operations, limit biodiversity outcomes and create distrust of such initiatives. For real mainstreaming to happen implementation must be valued as much as conceptual tools and innovative technology. A matrix of opportunities and decision guidelines for companies could greatly aid corporate decision-making that would then enhance the odds of success and on-the-ground change. Such an approach would allow companies to make the right choices when entering into partnership efforts with NGOs.

To successfully mainstream biodiversity into operations, CBD and its NGO partners must pivot and view industry and its business needs as opportunities for biodiversity mainstreaming and not obstacles. By truly understanding the operational and governance needs of business, CBD can drive change at the national level. By likewise understanding the operational needs of business and corporate commonalities and acknowledging that no single tool represents a sole solution, NGO partners can open avenues for interactions with corporations that result in systematic, replicable change on the ground.

Attachments

A series of white papers authored by WHC which present case studies on successful approaches to biodiversity within a business framework. The case studies, while showcasing site-specific activities reflect the variety of ways in which biodiversity is mainstreamed in industry as each case study represents one instance of an overall corporate approach to conservation.