

RECONCILING DEVELOPMENT AND BIODIVERSITY CONSERVATION IN MOZAMBIQUE AND CONTRIBUTING TO NATIONAL CONSERVATION TARGETS

Conservation, Mitigation and Biodiversity Offsets
COMBO Program



BACKGROUND

The [COMBO](http://www.comboprogram.org)¹ program started in 2016 through a project with the same name, originally designated as CONservation, Mitigation and Biodiversity Offsets in Africa. Because it developed a specific approach with the capacity for replication in other geographies it ended up becoming a program, which began its second phase in 2021.

Led by the Wildlife Conservation Society (WCS), in partnership with Biotope and Forest Trends, and originally funded through the French Development Agency (AFD), the French Environmental Fund (FFEM) and the Mava Foundation, the COMBO program aims to promote a best practice approach to reconciling economic development with the conservation of biodiversity and ecosystem services by mitigating the impacts generated by development projects.

Mozambique has been investing on development and economic growth in order to improve productive capacity and the living conditions of its population. The country is characterized by an abundance of natural resources

and biodiversity, which are also essential pillars for its growth. However, the development and conservation of biodiversity has not always been reconciled. Species, ecosystems and important services that these provide, on which most of the rural population depends for survival, have been impacted.

In 2015, Mozambique reviewed its Environmental Impact Assessment legislation, introducing the requirement of projects to adequately implement the mitigation hierarchy, including biodiversity offsets whenever necessary. It also stated that the latter should be regulated by a complementary legal document. Therefore, the COMBO program was much welcomed by the country and its first phase was implemented between October 2016 and June 2020, through a partnership between the Ministry of Land and Environment (MTA)- National Directorate of Environment (DINAB)- the Wildlife Conservation Society (WCS), the Foundation for Biodiversity Conservation ([BIOFUND](https://www.biofund.org))² with funding from the donors mentioned above.



1 www.comboprogram.org, 2 <https://www.biofund.org>

COMBO PROGRAM PHASES

The first phase of the program, i.e. the original COMBO project, started in 2016 and was completed in 2020. It was implemented in four African nations - Guinea Conakri, Madagascar, Mozambique and Uganda through a Memorandum of Understanding (MoU) with the governments of these countries. In all countries, fundamental steps were taken that effectively resulted in improving policy, legal and technical frameworks to enable the adequate implementation of the mitigation hierarchy, in addition to having increased the technical capacity of these countries in this regard. It has also resulted in the introduction of measures, legislation, policies and institutional reorganization to start the implementation of biodiversity offsets in these countries.

Given the success of the first phase, AFD and FFEM decided to fund a second phase, running from 2021 to 2025, which expanded the program to Asia, in this case Myanmar and Laos. The second phase focuses on supporting the effective implementation of the impact mitigation hierarchy, including biodiversity offsets in the four African countries and developing the necessary foundations to enable its extension to the two Asian countries.

COMBO in Mozambique

WCS has a Memorandum of Understanding (MoU) with the Ministry of Land and Environment (MTA), through which the COMBO program has been implemented. The technical implementing partners are WCS, that leads the program in the country, and BIOFUND. The National Directorate of Environment (DINAB) is the counterpart technical institution from the MTA. As a result of the first phase of COMBO, and as part of a Ministerial restructuring, within the Department of Environmental Licensing, DINAB created a Biodiversity Offsets Division.

One of COMBO's main outputs was the development of a proposal for a new biodiversity offsets regulation, aligned with the Environmental Impact Assessment regulation (Decree 54/2015 of December 31). Several complementary tools were developed, including a standard form (check-list) for checking the information on biodiversity that should be included in Environmental Impact Studies (EIA). The project interacted and trained the public and private sectors, civil society, conservation partners, universities, and bilateral and multilateral institutions.



OBJECTIVES OF FIRST PHASE (2016-2020)

- **Support the Government in improving the Environmental Impact Assessment (EIA) policy** by encouraging investment in development projects that result in No Net Loss (NNL) or Net Gain (NG) of biodiversity, as specified in the EIA regulations.
- **Create enabling conditions for development projects to achieve NNL of biodiversity** by: i) supporting national spatial planning processes; ii) identifying relevant biodiversity metrics; iii) developing and implementing sampling methodologies for baseline studies and monitoring.
- **Developing institutional, legal and financial mechanisms for the implementation of biodiversity offsets**, particularly those linked to conservation trust funds to ensure the permanence of conservation results.
- **Support the adoption of best practices in the public and private sectors** by monitoring initiatives and developing lessons learned.
- **Build national and regional capacity**, sharing lessons learned from African and international experiences of NNL/NG activities, involving a wide range of stakeholders.



BIODIVERSITY OFFSETS

correspond to the measurable results of concrete conservation actions on the ground carried out at a site other than the impacted area, aimed at offsetting the significant residual adverse impacts on biodiversity arising from the development of an activity or project, after appropriate measures have been taken to avoid and minimize those impacts and to restore the affected areas.



RESULTS ACHIEVED IN THE FIRST PHASE (2016-2020)

Legal framework

Together with the company Impacto, Lda, a **“Gap Analysis on Policies, Laws, Capacity and Experience to achieve No Net Loss or Net Gain (NPL/GL) of Biodiversity in Mozambique”** was developed. This analysis served as a basis for COMBO, in partnership with BIOFUND, to support DINAB in the development of Guidelines for the Application of the Mitigation Hierarchy, in accordance with Decree no. 54/2015 of 31 December (EIA Regulation), through an extremely participatory process that involved all relevant sectors, having been promoted **23 meetings, with 270 participants from 99 different institutions.**

With the support of BIOFUND and a team of legal consultants funded by the BIOFIN project, the guidelines resulted in the **proposal of the Ministerial Diploma “Diploma Ministerial” for the application of Biodiversity Offsets in Mozambique**, which is foreseen in the EIA Regulation and was submitted at the Minister of Land and Environment for approval at the end of 2021.

The documents now developed require project developers to achieve No Net Loss or Net Gain of biodiversity and **promote its contribution to the**

biodiversity targets set by Mozambique, with emphasis on Target 11A and 11B of the National Biodiversity Strategy and National Biodiversity Action Plan (2015-2035).

The team also reviewed and contributed to 21 documents related to the project theme, such as policies, legal documents, legislation and comments on EIA processes. Some examples are:

- Decree no. 89/2017 of 29th December on the Regulation of the Law for the Protection, Conservation and Sustainable Use of Biological Diversity
- Ongoing process to align the specific environmental regulation for mining activities with Environmental Impact Assessment regulation and biodiversity offsets regulation (under development), providing technical support to DINAB and MIREME
- Review and participation in the discussions of the National Plan for Territorial Development (PNDT) and the National Maritime Spatial Plan (POEM)
- Environmental Guidelines for Oil and Gas Activities (land and marine) and Mining (Large and Small Scale) and the Strategic Environmental and Social Assessments of these sectors.



The Centre for Agricultural Studies and Natural Resources Management (CEAGRE) was assigned by the project to develop the Miombo component and the report “**A Contribution to the Biodiversity Offsets System of Mozambique: Framework for Evaluating the Ecological Condition of Miombo Woodlands**” Financed by BIOFUND, the Department of Biological Sciences (DCB) of UEM developed an ecosystem condition metrics for mangroves.

Funded by SPEED+ (USAID’s funded project), in coordination with DINAB and other partners, WCS developed a complementary project for the “**Identification and Mapping of Key Biodiversity Areas (KBAs) in Mozambique and the Red List of Threatened Species and Ecosystems**”, which informed the PNDT and POEM.



Institutional, legal and financial mechanisms for the implementation of biodiversity offsets

WCS/COMBO and BIOFUND signed a MoU for implementing the Biodiversity Offsets Program. This agreement helped to define a strategy for BIOFUND to implement biodiversity offsets in the country and promote the approach to other trust funds in the region, such as the Consortium of African Funds for the Environment (CAFÉ).

In partnership with BIOFUND and the BIOFIN project (as co-financier) a consultancy was hired to assess “Legal Analysis on Liability of Responsibility of Biodiversity Offset Projects in Mozambique”, subsidizing the development of the new regulations. Field visits were conducted to the Maputo Special Reserve (REM) and Licuáti Forest Reserve to assess

the potential of these areas as receptors of biodiversity offset pilot studies. Based on these visits and the collection of additional data, a concept was developed to implement habitat improvement pilot projects that will serve as a learning tool for future offset projects to test the Ministerial Diploma on Biodiversity Offsets and its guidelines.

Through **BIOFUND** it was possible to **mobilize** additional funding to implement this approach in Mozambique through the World Bank/ MozBio Project 2 and the UNDP/ BIOSFAC Project at about **USD 1.25 million** to support the development of policies, technical guidelines and pilot projects in the field.



Engaging with private sector

In order to develop case studies to support the adoption of best practices in the application of the Mitigation Hierarchy by the public and private sectors and to develop lessons learned, **COMBO signed an MoU with Portucel Mozambique** to develop a case study on how this forestry company applied the Mitigation Hierarchy to its project in Zambézia province.

The COMBO project also carried out a peer review of the study conducted by Impacto, Lda. for SASOL in the reassessment of an area in Inhassoro district

(Inhambane province) as a critical ecosystem according to international good practice.

Together with BIOFUND, **the project involved more than 10 private and several public companies** in the development of guidelines on the application of the Mitigation Hierarchy, and interacted with other projects, such as CONNECT, BIOFIN and CAPITAL NATURAL, to ensure productive coordination between the various initiatives underway.



Training, capacity building and outreach

Between 2016 and 2020, COMBO and BIOFUND (with additional partners on some occasions) promoted **11 training sessions** in several regions of the country, with a total of **339 people trained**, and **over 1,000 people reached**. A package of 20 modules for Training on the Mitigation Hierarchy and planning policy and projects for NNL or a NG of biodiversity was developed and is ready to be used in Mozambique in the coming years. In the same period, the COMBO team participated in 143 national and 13 international events (56 as speakers) and promoted 269 meetings; made presentations in 7 major international conferences and 12 national. In partnership with BIOFUND, the project promoted four major events of exchange of experiences in which technicians of the Government of Mozambique participated:

- (i) Workshop and exchange of experiences conducted between Mozambique, Madagascar and Uganda: **“Making use of Biodiversity Offsets Schemes to achieve No Net Loss of Biodiversity in Africa”**;
- (ii) Exchange of experiences in Madagascar: **“Implementation and Management of Biodiversity Offsets to Achieve No Net Loss of Biodiversity”**;
- (iii) **Final Evaluation Meeting of COMBO Project**;
- (iv) Forum on **“Harmonizing Economic Development and Biodiversity Conservation”**, within the IV BIOFUND Biodiversity Exhibition.

Several communication materials were developed about the project and the Mitigation Hierarchy and Biodiversity Offsets theme (see [COMBO](#)⁴ and [BIOFUND](#)⁵ web pages).



4 <https://comboprogram.org/>

5 <https://www.biofund.org/mz/projects/programa-de-contrabalancos-de-biodiversidade/>

RECOMENDATIONS FROM THE FIRST PHASE

Policy and legal framework:

i. approval of the Ministerial Diploma on Biodiversity Offsets in Mozambique; **ii.** finalize the Ministerial Diploma on Independent peer-reviewers for Category A+ projects; **iii.** include Key Biodiversity Areas in national, provincial and district planning processes, as areas to be avoided by development projects that threats biodiversity and ecosystem services in those areas; **iv.** establish, within the National Directorate of Environment, a unit to implement the Diploma on Biodiversity Offsets; **v.** implement the mechanism to register biodiversity offset projects; **vi.** establish a National Multisector Biodiversity Offset Coordination Group and a technical group to support DINAB in defining the new CBD biodiversity targets for the period 2020-2030, to which offsets should contribute.

Technical tools:

i. continue to promote, in coordination with the Academy, the development of metrics to assess the ecological condition of ecosystems and habitat quality for species and promote their testing in the field; **ii.** approve the historical ecosystem map of Mozambique and assessment of its conservation status, and once validated, defining it as a technical tool for use in the EIA process and spatial planning; **iii.** approve and

regularly update, at Ministerial level, the technical guidelines for the application of the mitigation hierarchy in accordance with the Decree 54/2015 and the new Diploma on Biodiversity Offsets.

Institutional development and training:

i. support and promote initiatives for the development of pilot projects to test the Biodiversity Offsets Regulation and improve the technical guidelines, as well as train all stakeholders in its application; **ii.** continue to promote and support training sessions on the implementation of the mitigation hierarchy and biodiversity offsets at national and provincial levels, duly aligned with the new Diploma; **iii.** support and promote initiatives for exchange of experiences within and outside the country.

Intra and inter-institutional coordination:

i. improve internal guidelines for categorizing projects into category A+ or A by Provincial Services; **ii.** promote collaboration between the public and private sectors to increase commitment to the application of the mitigation hierarchy and biodiversity offsets, involving the private sector in pilot projects for training, demonstration activities and exchange of experiences.



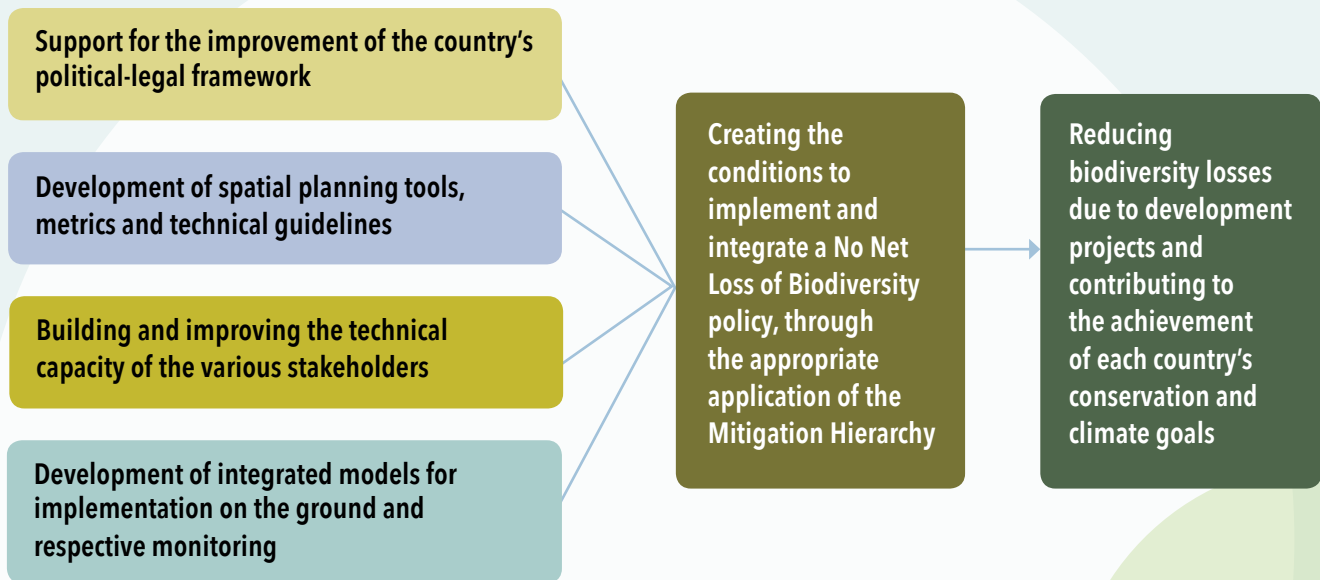
APPROACH FOR PHASE 2 (2021-2025)

The second phase of COMBO started in 2021 and intends to support the countries to implement what was established in the first phase, by developing more tools, continue capacity building and implement pilot projects. The focus is on:

- Support the government to identify, analyze and introduce appropriate policies to encourage investment in development projects that result in no net loss or a net gain of biodiversity.
- Create enabling conditions for development projects to achieve no net loss of biodiversity by: i) supporting

national planning processes; ii) identifying relevant biodiversity metrics; iii) developing and implementing sampling methodologies for baseline studies and monitoring.

- Build national and regional capacity by sharing lessons learned from experiences of no net loss activities with a wide range of stakeholders involved.
- Develop the institutional, legal and financial mechanisms for implementing offsets, particularly those linked to conservation trust funds to ensure permanence of conservation outcomes.





The COMBO program works with governments, the private sector, civil society, and academia to expand and improve the application of the “mitigation hierarchy,” i.e., “avoid” and “minimize” the impacts of activities associated with development projects, “restore” biodiversity at impacted sites, and “offset” significant residual impacts by enhancing equivalent biodiversity elsewhere outside the area of influence of project impacts.

In line with international good practice, the program thus aims to support countries trying to implement a policy of achieving No Net Loss of biodiversity or even Net Gain of biodiversity, in particular for projects subject to regulation

WCS - Wildlife Conservation Society is a US tax-exempt, non-profit, non-governmental organization founded in 1895 that protects wildlife and wild places by understanding critical issues, creating science-based solutions, and promoting conservation actions that benefit nature and humanity. With more than a century of experience, long-term commitments in dozens of landscapes, a presence in more than 60 countries, and expertise in helping establish nearly 270 protected areas around the world, WCS has accumulated biological knowledge, cultural understanding, and partnerships to ensure that vibrant places with wildlife and flora thrive alongside local communities. WCS has been present in Mozambique since 2012, working closely with the government on biodiversity conservation.

www.wcs.org • www.comboprogram.org • [wscsmozambique@wcs.org](mailto:wcsmozambique@wcs.org)

BIOFUND - The Biodiversity Conservation Foundation is a private, public-interest entity whose function is to support conservation funding in Mozambique, with an emphasis on Conservation Areas.

www.biofund.org.mz • www.biofund.org.mz/projects/programa-de-contrabalancos-de-biodiversidade
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MAPS: p6 left WCS 2021; p6 right IMPACTO & WCS 2018, p7 WCS 2021.