The COMBO Program: COnservation, Mitigation and Biodiversity Offsets
Synthesis Report

September 2021

COMBO

BALANCING CONSERVATION & DEVELOPMENT

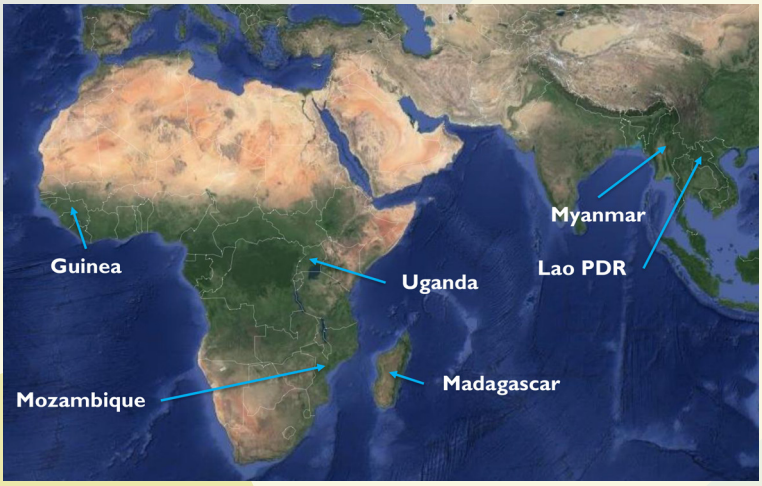
WCS biotope FOREST TRENDS AFD FFEM MAVA FONDATION POUR LA NATURE

OVERVIEW

COMBO is an initiative that supports mainstreaming of biodiversity and conservation into development. COMBO partners work with governments, industry, lenders and civil society to improve biodiversity outcomes from industry and infrastructure projects.

COMBO's overall goal is to reconcile economic development and conservation of biodiversity by supporting government policies which improve mitigation of industry impacts. The COMBO's first phase from 2016-2020 was in four countries: Madagascar, Mozambique, Uganda and Guinea. Wildlife Conservation Society (WCS) led activities with principal partners, Biotope and Forest Trends, along with national partners in the host countries. Investment was provided by the Agence Francaise de Développement (AFD) and the Fonds Francais pour l'Environnement Mondial (FFEM), with additional support from the MAVA Foundation.

The effectiveness of the first COMBO phase encouraged AFD and FFEM to consider further investment. In June 2021, WCS signed an agreement with AFD and FFEM for this new COMBO phase running from 2021-2025. The program is being implemented with partners Biotope SAS, Biotope Madagasikara, Guinée Ecologie and BIOFUND and other national partners. It is reinforcing the results achieved in the first four countries and expanding the COMBO approach to South-East Asia and globally. Our approach will ensure effective implementation of policy, guidance and methodology developed so far and allow rapid roll out in new countries based on our experience.



CONTEXT

The globalization of the economy and the rapid development of many countries have resulted in an unprecedented increase in global pressures on renewable and non-renewable natural resources, and the ecosystems that support them. Many countries have recognised this by signing the Convention on Biological Diversity and are setting targets as part of negotiations for the COP15 in 2022. There is growing recognition of the importance of nature conservation for addressing climate change and this is further driving national target-setting for biodiversity. Many countries have adopted legislation requiring project developers to conduct environmental and social impact assessments of their project as part of an effort to limit the environmental and social impacts of extractive industries (e.g. timber, mines, oil & gas, fisheries) and major infrastructure development (e.g. energy production and transport). However, mitigation actions required by current policy often fail to address major development impacts and, importantly, may not contribute to national biodiversity targets. Additionally, individual project actions are unable to address the more severe cumulative impacts of multiple projects nor the induced impacts from socio-economic factors interacting with a project.

To address these concerns, COMBO partners work with governments, industry and other partners to support adoption and application of national policy which is aligned with international best practice such as the International Finance Corporation's Performance Standards and the Business & Biodiversity Offsets Programme's Standard. These require actions forming a mitigation hierarchy comprised of four steps: *Avoidance, Minimisation, Restoration* and *Offsets*. Avoiding impacts before they occur, i.e. 'prevention is better than cure', is the most effective step for reducing the impacts of development on biodiversity. Application of effective mitigation policy supports progress towards national and global biodiversity targets.

POLICY

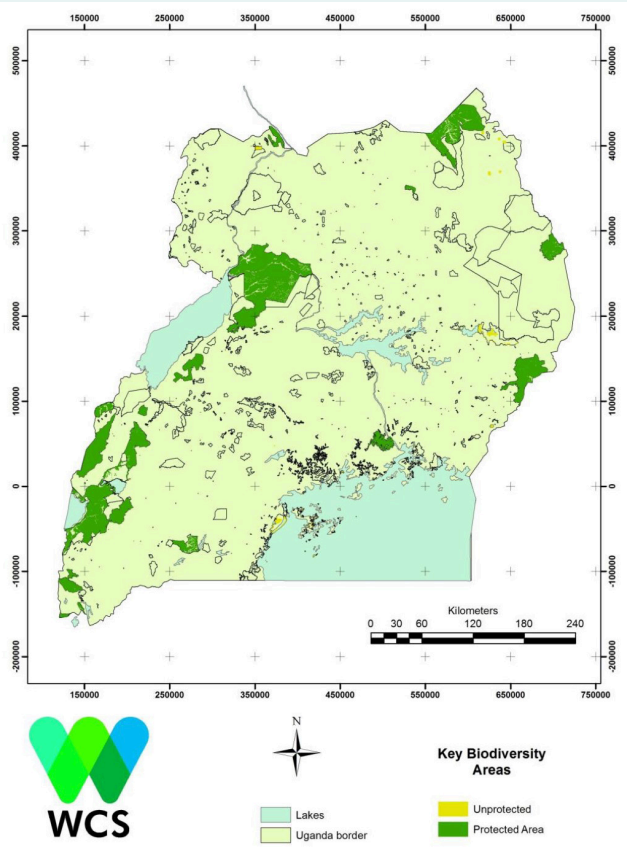
The COMBO approach focuses on adoption of better mitigation policy and practice. Our aim is to support governments in establishing governance systems and policies to guide the implementation of the mitigation hierarchy nationally while supporting progress towards national biodiversity objectives.

We have helped develop new laws and policy instruments which incorporate the mitigation hierarchy and biodiversity targets. Mozambique has approved the Conservation Law (2017) and associated regulations (2017), the latter with strong support from COMBO. A new regulation in Mozambique that establishes effective application of the mitigation hierarchy and biodiversity offsets in Mozambique is now under review. Uganda has passed the National Environment Act (2019) and the Uganda Wildlife Act (2019) which integrate mitigation best practice. Uganda's Government is developing national offsets guidelines with COMBO's support. The mitigation hierarchy concept has been incorporated into Guinea's new Environmental Code and in different sectoral planning documents. Guinea's Minister of Environment signed the arretés for the creation and membership of the National Offsets Committee in 2017 which strengthens the institutional basis for mitigation practice. Madagascar is developing an amendment to the Mise en Compatabilité des Investissements avec l'Environnement (Décret MECIE), in addition to other policy integrating best practice, with our support. Our current focus is supporting definition of implementing regulations for new laws, improving capacity of public institutions to apply policy; and encouraging cross-sectoral coordination in applying policy.

PLANNING & IMPLEMENTATION TOOLS

Government planning agencies, extractive industry licencing authorities, infrastructure planners and business often lack easy access to data on biodiversity priorities. This limits effective avoidance of impacts which must be integrated into the early stage of investment decisions. Another constraint is that identification and application of mitigation actions is complex. COMBO works with government, industry and other stakeholders to support better access to information on spatial biodiversity priorities. We develop tools and guidance for spatial planning and offset implementation and the legal, financial and technical mechanisms to avoid, mitigate and offset impacts.

COMBO identified and collated biodiversity datasets for each country to support improve mitigation of impacts. We mapped habitats in several project countries including updated habitat typologies in Guinea and Mozambique. We worked with government to apply international standards such as the IUCN Red List of Ecosystems criteria and the Key Biodiversity Area Standard in Mozambique, Uganda and Myanmar. We helped the Government of Mozambique map all conservation areas of the country which had not previously been collated on a single map. Mapping and publicizing the most important sites for wildlife help developers avoid biodiversity impacts.



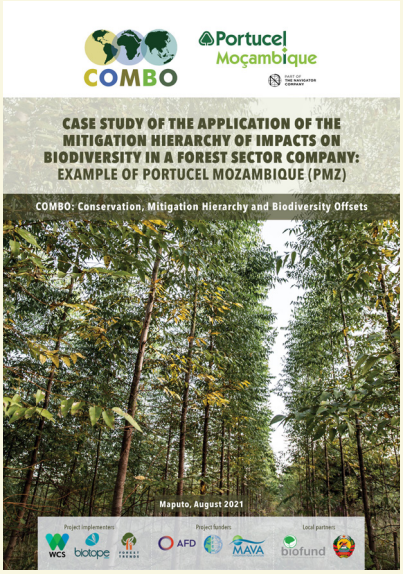
Uganda was the first country to apply the new Key Biodiversity Area Standard to identify priority sites for conservation nationally.

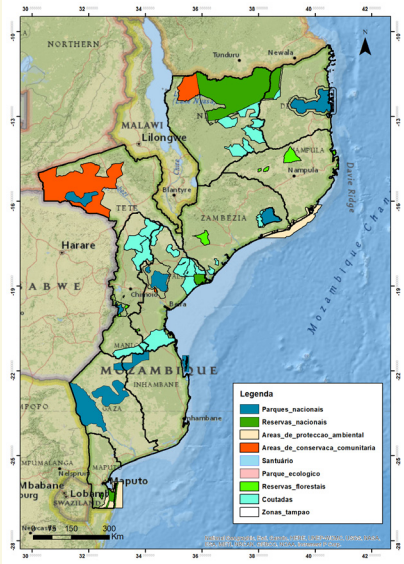
OFFSET IMPLEMENTATION MODELS

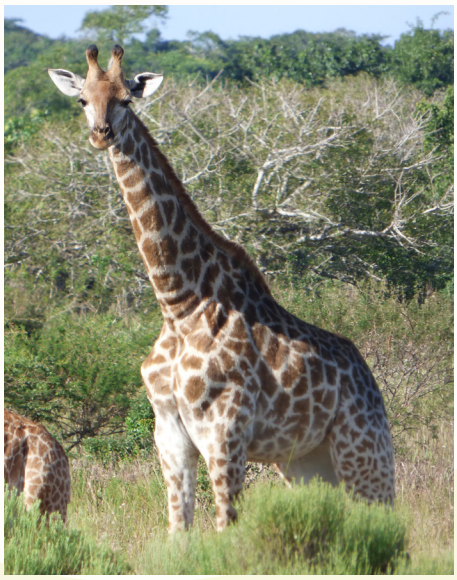
COMBO works with stakeholders to develop the models and guidance necessary for the long-term finance and management of offsets. Ensuring sufficient financing is imperative and without appropriate, adequate, and long-term finance, the additional conservation gains required for offsets would fail to materialize. COMBO has prepared guidance on financing and on implementation of offsets. These are being used by governments, conservation trust funds, industry and other actors to inform design of national offsets systems and implementation of individual offset projects.

COMBO is working with governments and other stakeholders to test funding mechanisms, offsets monitoring registers and robust technical, legal and governance models for delivering biodiversity gains. COMBO partners with conservation trust funds where they exist to develop appropriate mechanisms for implementation. In Mozambique, BIOFUND has contributed significantly to designing the national road map for offset implementation. It has been identified as a suitable recipient of offset funding, with responsibility for supporting third party offset implementation. The Madagascar Biodiversity and Protected Area Fund (FAPBM) currently manages voluntary offset financing and will take on greater offset financing once new legislation, developed with COMBO's efforts, is in place. We are working with FAPBM and other national trust funds to improve each country's capacity to design and administer offsets. In Guinea, COMBO is assisting the government in the creation of a conservation trust fund which will have

the potential to oversee offsets financing. We have worked with industry to identify potential mitigation case studies based on their experience. For example, Portucel Mozambique and COMBO identified recommendations for improving biodiversity outcomes following development: improved data, such as maps of conservation protected areas, would help improve mitigation and speed up development.







Industry case study developed with Portucel identifies the need for better data to improve biodiversity outcomes: COMBO produced a new map of Mozambique's conservation areas which helps fill this need.

CAPACITY-BUILDING AND OUTREACH

Improved understanding of the need for balancing conservation and development is a priority for better application of mitigation policy. We work with a wide range of national and global stakeholders to improve knowledge of how effective implementation of policy can support progress towards biodiversity targets. We engage governments, civil society, financial institutions and business to build national capacity for developing mitigation actions.

We have hosted and continue to run webinars and training sessions for interested people from around the world. We have produced detailed training materials in several languages, including 20 training modules which we continue to develop for public use. These events and materials are aimed at practitioners from government and the private sector. They are particularly suitable for government planning and licencing authorities, including those involved in policy development. This approach has allowed us to mentor individuals as they develop national policy, such as mitigation guidance. Industry partners, including national infrastructure agencies and commercial businesses, have benefited from tailored engagement and support through training sessions and ongoing discussions. Training has helped build national capacity in the program's countries to deliver improved biodiversity outcomes from development.

Wildlife Conservation Society (WCS): established in 1895 it is a non-profit entity, organized under the laws of the United States of America, with headquarters in New York that is dedicated to saving wildlife and wild places around the world through science, conservation actions, education and inspiring people to value nature. It has a presence in over 60 countries, and provides support to over 370 conservation areas worldwide.

COMBO Program: the program began in 2016 through a project with the same name, originally called COnservation, Mitigation and Biodiversity Offsets. The second phase began in 2021. Led by WCS, in partnership with Biotope and Forest Trends, and originally funded through the Agence Francaise de Développement (AFD), Fonds Français pour l'Environnement Mondial (FFEM) and MAVA Foundation, the program aims to reconcile economic development with the conservation of biodiversity and ecosystem services.

Biotope: a firm, created in France in 1993, which has become one of the World's leading consultancies specialized in biodiversity, ecosystems, and nature-based solutions. Biotope's dedicated full-time staff of approximately 300, mostly ecologists, brings extensive experience and know-how in biodiversity management in the context of industry, from a broad range of sectors (extractives, energy, infrastructure, agriculture, forestry, etc.). Biotope's experience in the field adds significant value and lessons learned to a growing involvement in strategy and policy development, especially on complex conservation – development trade-offs. Biotope has offices in Europe, Africa, the Americas and China, and has worked in over 45 countries.

Forest Trends: a non-profit organisation based in Washington DC and working around the world. It pioneers innovative finance for conservation - promoting healthy forests, sustainable agriculture, clean water, robust climate action, protected biodiversity, and strong communities.Forest Trends publishes timely research, brings together diverse actors, and applies the resulting approaches to make a difference on the ground, often blazing trails for bold and far-reaching policies in the process. Forest Trends founded and led the Business and Biodiversity Offsets Programme (https://www.forest-trends.org/bbop/), which produced principles, standards, toolkits and case studies upon which COMBO's advice is based.