

Consultation on the Safeguards Policy of the International Climate Initiative (IKI): input from BirdLife International

11 February 2022

Dear IKI Safeguards Team,

Firstly, let me thank you for the opportunity to learn more about IKI's Safeguards Policy revision process and to discuss some of the draft content during the online stakeholder consultation held last month. It was very useful to have your feedback there, and as promised I am following up with some brief comments in writing. These are far from exhaustive given limited capacity in our team at present, but we hope still of use as you revise the draft.

BirdLife International is the world's largest nature conservation partnership, with NGO partners in 115 countries, and is involved in many IKI projects around the world, as well as in advocating and helping to implement strong, science- and evidence-based biodiversity and climate policy. We are currently heavily engaged in supporting negotiations on the post-2020 global biodiversity framework and ensuring synergies with other UN processes such as the high seas treaty and Paris Agreement.

We are part of a CEO-led group that is advocating and looking at the technical detail underpinning a **nature-positive global goal for nature** (www.naturepositive.org), which has strong and growing support from stakeholders across the board (e.g. the recent [MDB joint statement on nature, people and planet](#) released at COP26, committing to nature-positive investments). This nature-positive goal means halting and reversing the loss of biodiversity by 2030 (essentially global net gain of biodiversity, as a step towards living with harmony with nature by 2050), as part of a wider equitable, carbon-neutral, nature-positive future. Achieving these global goals on biodiversity, climate and people requires an urgent shift from business-as-usual, through joined up policies, action and finance. IKI's safeguards must reflect this, and this update is timely in being aligned with the finalisation of the global biodiversity framework.

These nature and climate goals are both supported by the German government, but as we know will be extremely challenging to implement in practice without strong and urgent action on both biodiversity and climate. Given IKI's aim is to "promote climate action and biodiversity projects in developing and emerging countries", the draft safeguards could be stronger, if IKI projects are to not just 'do no harm' but proactively, and in every case, contribute to the nature-positive global goal for nature, as well as keeping 1.5°C alive, by 2030. Ultimately, a funding scheme specifically aimed at supporting biodiversity and climate action should surely produce **ONLY** positive impacts in these two areas.

For example, while the first goal (a) of "maximising the positive environmental and social impacts of projects" is good, the second goal (b) is "reducing, minimising and **ideally preventing** adverse impacts on people and the environment" - but surely IKI should go beyond 'ideally' preventing adverse impacts to **ensuring no** adverse impacts at the very least? Similar language is used for the guiding principles, in stating under principle (a) that this is only "**where possible** to go beyond preventing, mitigating or reducing adverse impacts" – we suggest removing 'where possible'.

Reference is made under guiding principle (g) to applying the mitigation hierarchy as a fundamental principle for managing environmental and social risks. We support this, but would in fact propose to go beyond the mitigation hierarchy where possible, towards the newer but more comprehensive **Mitigation and Conservation Hierarchy** approach, (see <https://conservationhierarchy.org/>). The MCH unites impact mitigation with proactive conservation under a single framework and is designed to be used by different stakeholders across scales to ensure positive impact overall.

Reference is also made to the **International Finance Corporation (IFC)'s Performance Standards**. While these are on the whole strong, they do have limitations, and shouldn't always be viewed as the gold standard if we're to get real biodiversity/climate ambition. Given IFC is aimed at private sector development, one might expect and allow lower biodiversity/climate safeguards than for a scheme specifically focused on biodiversity/climate projects such as IKI, and we would encourage IKI to consider going beyond the IFC standards where feasible in terms of capacity to develop and implement them.

Finally, under section 7.2 on conditions for safeguards-relevant project termination, the conditions in section (a) seem pretty severe – we would suggest amending “major” to “major or continued,” as ongoing, unaddressed adverse impacts should also be something that IKI funding should not support. It would be helpful to include a definition of “major” or “massive,” and as indicated in the tracked changes on the draft document, to provide links to references like the exclusion criteria.

Please find further comments on the text of the draft safeguards policy itself, attached.

We hope these brief comments are useful, and hope that the items detailed above will be well reflected in the final draft. We also welcome the opportunity to comment further as appropriate, as well as to provide further technical support on the definition and tracking of nature positive outcomes if helpful.

With kind regards,

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