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CCSI's Consolidated Feedback on the WBA Draft Nature Benchmark Methodology March-April 2022

I. Introduction

CCSI appreciates this opportunity to provide feedback on [WBA's Draft Methodology for its Nature and Biodiversity Benchmark](#). CCSI is an ally of WBA. We have collaborated with WBA's Food and Agriculture Benchmark team, working with WBA and Food Foundation to jointly identify the key topics to be covered by the Food and Agriculture Benchmark and by CCSI's own [Standards](#) for food processing company alignment with the SDGs. We have also appreciated opportunities to engage with WBA's Social Team, including by producing a report assessing the performance of Chinese, Indian, and Mexican companies on three draft social indicators.

We commend WBA for the integration of its core social indicators across all benchmarks.

Our feedback below on WBA's Draft Nature and Biodiversity Benchmark focuses on the social elements, and are informed by our experience creating our [Standards](#) for Food Company Alignment with the SDGs, which covered issues including biodiversity and resource rights, and by the expertise of CCSI's [Land, Agriculture, and Food Systems](#) team.

Before sharing our feedback on select indicators, we would first like to provide some brief background information on the importance of the human rights of Indigenous Peoples and local communities to the protection and restoration of nature:

The degradation of nature, biodiversity, and ecosystems pose severe social and human rights risks, including to land rights, rights of Indigenous Peoples to self-determination and cultural protections, the right to food, and the right to life. Conversely, securing communities' land rights, particularly those of Indigenous Peoples who [manage one quarter of the world's land](#) and yet [hold the rights to less than half of that](#), is crucial to achieving the climate pledges made at COP26. This finding was highlighted throughout an IPCC report released in March of 2022.¹ Strengthening Indigenous Peoples' rights can have powerful effects on forests, such as [reducing deforestation by 80% in the Peruvian Amazon](#). Furthermore, "evidence has shown that securing land rights can be an [impetus for climate-smart agriculture](#) by encouraging farmers to make long-term investments in soil health."²

¹ Including, *inter alia*, highlighting research findings from FAO and FILAC that "recognizing the land rights of Indigenous Peoples is among the most cost effective actions to address climate and biodiversity risks." https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_FinalDraft_FullReport.pdf

² <https://www.devex.com/news/opinion-securing-land-rights-is-key-to-fulfilling-the-cop-26-pact-102391>

At the same time, efforts to protect nature can present potential unintended consequences to individuals' and communities' human rights. Conservation efforts by some of the largest conservation organizations have allegedly financed and supported park guards in assaulting, raping, torturing, and killing people at parks in six countries in Asia and Africa during anti-poaching missions.³ In a 2021 report, Oxfam highlights the risk that net zero targets "risk being reliant on using vast swathes of land in low-income countries to capture carbon emissions... [leading] to an explosion in demand for land which, if not subject to careful safeguards, might risk increasing hunger and fuelling land inequality."⁴

Recognizing Indigenous peoples' land rights and working in partnership with Indigenous and local communities towards biodiversity goals remain critical. Indigenous-led conservation and landscape management can be more cost-effective than alternatives that exclude local communities; it can also produce better outcomes for biodiversity,⁵ helping to safeguard against ecosystem collapse that can lead carbon sinks to become large-scale carbon emitters.⁶

Efforts to protect the environment and nature can be catalytic in protecting and respecting human rights. However, this is not always the case, so prioritizing respect for human rights throughout these efforts is key.

Based on this background, CCSI has identified the following key objectives to guide its review of WBA's Draft Methodology:

- 1) Alignment with the corporate responsibility to respect legitimate tenure rights.*
- 2) Alignment with the corporate responsibility to respect the human rights of Indigenous Peoples, including with regard to the requirement for free, prior and informed consent (FPIC).*
- 3) Alignment with the corporate responsibility to respect the human rights of all affected communities, with a special focus on consultation and FPIC.*

Below, text from WBA's draft methodology and consultation questions are in blue and CCSI's text is black, with recommended changes highlighted in grey.

II. Indicator C1: Right to a safe, clean, healthy, and sustainable environment

C1 Right to a safe, clean, healthy, and sustainable environment

³ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/009/97/PDF/G1700997.pdf?OpenElement>;
<https://insideclimatenews.org/news/14022022/conservation-has-a-human-rights-problem-can-the-new-un-biodiversity-plan-solve-it/>;
<https://www.mediafire.com/file/djd94a93rq79b24/Knox+Comments+on+WWF+Safeguards+-+30+June+2021.pdf/file>

⁴ <https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621205/bp-net-zero-land-food-equity-030821-en.pdf?sequence=1>

⁵ <https://www.nature.com/articles/s41893-018-0100-6>

⁶ <https://www.washingtonpost.com/climate-environment/2022/03/07/amazon-rainforest-tipping-point-climate/>

Indicator: *The company respects the right to a safe, clean, healthy, and sustainable environment.*

Rationale: *The United Nations has recently recognized the access to a safe, clean, healthy, and sustainable environment as a universal human right (UN, 2021 b). Business activities and infrastructure projects may expose local communities to increased environmental risks and adverse impacts, for example related to toxic materials, or spread of diseases (IFC, 2012).*

Elements:

- a. *The company has a commitment to respect the right to a safe, clean, healthy and sustainable environment, with particular attention to the health of affected local communities.*

Consultation questions

- *The UN has only recently officially recognised the right to a clean, safe, healthy, and sustainable environment. How can we best assess companies' role in respecting this right?*
- *Due to the maturity of the topic, the indicator looks only for commitment-level disclosure, do you have feedback on how we can assess companies' disclosure and performance in addressing (potential) adverse impact on local communities' health and wellbeing? Are there any additional elements you suggest we include?*
- *Is this indicator too aspirational? Currently, company disclosure in this area is generally weak but we see it as an important indicator to drive change and set expectations – it is important that we find other stakeholders in support of this and develop a strong narrative on why this matters.*

As discussed above, while efforts to protect the environment and nature can be catalytic in protecting and respecting human rights, this is not always the case. Because of this, the responsibility of companies to respect *all* human rights (see [UNGP 12](#)) should be highlighted, rather than singling out the human right to a clean, safe, healthy, and sustainable environment, as the Draft Methodology currently does.

With regard to Indicator C1's only Element on a commitment to respect this right, under WBA's core social indicators, companies assessed under this benchmark will already be assessed on whether they have a commitment to respect human rights as outlined under the UNGPs. This Element does not appear to add substantially to what is already included in the core social indicators.

Furthermore, a commitment to respecting a particular human right is not sufficient evidence that a company does in practice respect that right. While it is an important first step, the fact that the only element for this indicator pertains to a commitment is concerning. To respect human rights under the UN Guiding Principles on Business and Human Rights (UNGPs), companies must conduct human rights due diligence by assessing, integrating, tracking, providing remedy, and disclosing on its efforts to respect human rights.

Additionally, related to the consultation question above regarding whether this indicator is “too aspirational”, the fact that the articulation of this right is so new also presents the challenge that few, if any, companies will have an explicit commitment to this right. Thus, this indicator will not meaningfully distinguish between companies that meet their social responsibilities and those that fall behind.

Finally, the indicators which precede section “C” on Social inclusion and community impact cover the range of impacts on the environment, many of which correspond with impacts on the human right to a safe, clean, healthy, and sustainable environment. It is therefore unclear what this indicator adds to the benchmark.

For these reasons, we would not recommend the benchmark place so much emphasis on a commitment to this right, and would instead recommend refocusing this indicator and its elements as follows:

Rather than have C1 as a distinct indicator focused on a *commitment* to respect the right to a clean, safe, healthy, and sustainable environment, instead:

- 1) Companies have a responsibility to assess, prevent, mitigate, remediate, and track their negative impacts on all human rights, including local communities’ right to a safe, clean, healthy, and sustainable environment. So we recommend refocusing the elements for indicator C1 on the relevant human rights due diligence systems, i.e., how does the company engage with affected stakeholders on its actual and potential impacts on the right to a clean, safe, healthy, and sustainable environment, and how does it assess, integrate, and remedy⁷ these impacts?, and
- 2) Assess whether companies consider the actual and potential impacts on all human rights – including but not limited to the rights to health, life, water, and food, and the rights of Indigenous Peoples⁸ – *throughout* the activities assessed in section B, with a focus on vulnerable individuals and communities who may be impacted by conservation and other activities (this is discussed below with regard to Indicator B10).

As an alternative to this indicator, or as an additional indicator, we recommend this Benchmark also include explicit recognition of the importance of respect for the rights of environmental and human rights defenders.

The protection of environmental and human rights defenders is vital due to both (1) the particularly high risk of physical violence and other forms of harassment they face connected to their efforts to protect land, water, ecosystems, and the environment; (2) the critical role environmental and human rights defenders play in supporting companies in identifying severe risks, including material risks, in their value chains.⁹

In 2020, the Business and Human Rights Resource Centre identified 140 cases of attacks on defenders in the mining sector and 137 related to agribusiness, including killings and judicial harassment. Many of these attacks stemmed from lack of consultation or the failure to secure free, prior and informed consent of affected communities.¹⁰ In 2021, the Resource Centre found that “Among the 615 attacks we tracked in 2021, nearly 70% were against climate, land

⁷ Including expectations related to grievance mechanisms, as discussed below.

⁸ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G13/192/11/PDF/G1319211.pdf?OpenElement>

⁹ <https://investorsforhumanrights.org/publications/safeguarding-human-rights-defenders-practical-guidance-investors> ; <https://www.globalwitness.org/en/press-releases/material-risks-growing-for-businesses-failing-to-engage-with-human-rights-defenders/>

¹⁰ <https://www.business-humanrights.org/en/from-us/briefings/line-fire-increased-legal-protection-needed-attacks-against-business-human-rights-defenders-mount-2020/>

and environmental rights defenders.”¹¹ Michel Forst, the former UN Special Rapporteur on the situation of human rights defenders, has said, “The agribusiness supply chain is one of the riskiest for human rights defenders and communities.”¹²

Some efforts companies can make to prevent and mitigate attacks on defenders that advance the protection of nature and biodiversity include: (1) enhanced assessment, monitoring, and prevention and mitigation measures in relation to private and public security forces the company contracts with (through which violence is most prevalent); (2) preventing judicial harassment of defenders, including through strategic litigation against public participation (SLAPPs); (3) aligning lobbying and public policy engagement with respect for human rights and achieving the 2030 Agenda, including by using leverage with governments to influence them to protect defenders and avoiding stigmatization of defenders in the media.

In recognition of the severe risks facing defenders and the vital nature of their work for protecting nature and achieving environmental justice, recent international agreements have specific provisions protecting environmental and human rights defenders.¹³

III. Indicator C2: Land Rights

C2 Lands rights

Indicator: *The company respects the rights of legitimate tenure holders when acquiring, leasing or using land, paying particular attention to vulnerable tenure rights holders.*

Rationale: *When companies seek to acquire or lease land for their business activities, it can lead to relocation and loss of shelter or livelihoods for communities or individual households (IFC, 2012 b). In countries where national governance and land administration is weak, local and indigenous communities are more exposed to rights violations and displacement (WRI, 2017).*

Elements:

- a. *The company has a commitment to respect ownership/use of land and natural resources and legitimate tenure rights related to ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), or the IFC Performance Standards.*
- b. *When acquiring, leasing land, or making other arrangements to use or restrict the use or access to land or natural resources, the company discloses its processes to (1) identify legitimate tenure rights holders, including through engagement with affected communities in the process and with particular attention to vulnerable or marginalized tenure rights holders (2) negotiate with them to provide adequate compensation or requested alternatives to financial compensation.*
- c. *The company includes land requirements in its suppliers’ code of conduct, including the requirement to have a process to identify legitimate tenure rights holders when*

¹¹ <https://www.business-humanrights.org/en/from-us/briefings/hrds-2021/>

¹² <https://www.forestpeoples.org/en/news-article/2020/human-rights-defenders-call-consumer-goods-forum-companies-prevent-violence>

¹³ <https://namati.org/news-stories/escazu-agreement-historic-step-towards-environmental-injustice/> ; <https://sdg.iisd.org/news/aarhus-convention-creates-mechanism-to-better-protect-environmental-defenders/>

acquiring, leasing or making other arrangements to use land, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation in its supplier code of conduct.

- d. *The company works with suppliers to improve their practices in relation to land use/acquisition.*

We recommend changing in the text of Element “b” from “identify legitimate tenure rights holders” to “identify all legitimate tenure rights holders.”

Through their use of land, companies can impact human rights beyond the land rights of legitimate tenure rights holders. For example, the human right of local communities to water can be impacted if a company spills toxic waste onto the land which contaminates a local communities’ source of drinking water—regardless of whether the community has legitimate tenure rights over the immediate project or concession area. Furthermore, all individuals and communities have the human rights to participation and information, as first established in the International Covenant on Civil and Political Rights.¹⁴ In order to respect the human rights of local communities, including their human rights to participation and information, companies are expected to do full and proper consultations with them as part of their expectation under the UNGPs to conduct human rights due diligence. This expectation of consultation applies even to those who do not have legitimate tenure rights over the immediate project or concession area. While consultations can serve to help identify legitimate tenure rights holders, broader consultations should also be done to understand how the company’s acquisition, lease, or use of land will affect human rights more generally, and to enable rights holders to participate in and influence decision-making concerning the project.¹⁵

For these reasons, we recommend that this indicator include the expectation that companies conduct meaningful consultations not only to identify legitimate tenure rights holders, but also to ensure all affected communities participate in and influence decision-making concerning projects. We also recommend including the expectation that companies understand and mitigate the potential or actual impacts of their land use on human rights generally, rather than only considering the impacts on legitimate tenure rights.

Free, prior and informed consent (FPIC) is a clearly defined human right for Indigenous Peoples, based on their rights to self-determination, among others. Additionally, there is a growing expectation, including in some national laws and in sustainability initiative standards such as those of the Forest Stewardship Council¹⁶ and the Roundtable on Sustainable Palm Oil (RSPO)¹⁷, that FPIC should be obtained from *all* affected local communities.

¹⁴ <https://scholarlycommons.law.northwestern.edu/cgi/viewcontent.cgi?article=1861&context=njilb>, p. 57.

¹⁵ The right to public participation entitles rights holders to effectively participate and—critically— to actually influence decision-making throughout the project’s lifecycle (Source: Special Rapporteur on Extreme Poverty, op cit, UN Doc. A/HRC/23/36, para 39 (“participatory processes must be meaningful for those living in poverty and they should be able to exert influence over the final outcome. They should be included in all stages of the relevant decision-making processes so that they have the chance to set priorities or question the agenda in fundamental ways.”))

¹⁶ Forest Stewardship Council, FSC Principles and Criteria for Forest Stewardship, § 4.8 (July 22, 2015).

¹⁷

[https://www.rspo.org/files/resource_centre/FPIC%20and%20the%20RSPO%20a%20guide%20for%20companies%20Oct%2008%20\(2\).pdf](https://www.rspo.org/files/resource_centre/FPIC%20and%20the%20RSPO%20a%20guide%20for%20companies%20Oct%2008%20(2).pdf)

Even under an analysis that does not extend FPIC rights to non-Indigenous local communities, all communities have the rights to information and participation, which amount to an expectation that companies meaningfully consult with them regarding actual and potential impacts of their land use on these communities, regardless of whether they have legitimate tenure rights.

Despite the above expectations for FPIC and meaningful consultation, the phrasing of this indicator appears to assume that the company will advance the project no matter what and that consultations are only a means to identify tenure rights holders and to “negotiate compensation.” Instead, the purpose of consultation is to better understand impacts on communities’ rights, explore alternative approaches that avoid or mitigate such negative impacts, enable their meaningful participation in relevant decisions, and finally, obtain their consent prior to an investment or use of land.

Furthermore, in the text of Elements “b”, “engagement” should be replaced with “consultation” and “meaningfully enabling community participation in decision-making”.

Suggested alternative language for Element “b”:

- “(1) ... including through consultation with affected communities in the process and with particular attention to vulnerable or marginalized tenure rights holders, (2) consult in good faith with communities on an ongoing basis in order to meaningfully enable their participation in decision-making, and (3) where investments go forward, consult with communities to provide adequate compensation or requested alternatives to financial compensation.”

See also: CCSI’s [Handbook](#) Resource Rights standard (pp. 145-152), [UNDRIP](#), [UNDROP](#), [FAO Respecting Free, Prior and Informed Consent: Practical Guidance for Governments, Companies, NGOs, Indigenous Peoples and Local Communities in Relation to Land Acquisition](#)

The text of Element “d” should more clearly reflect that the objective is respect for the human rights of local communities. Suggested language for Element “d”: “improve their practices in relation to respect for human rights through their acquisition, leasing, and use of land.”

Additionally, the language of indicators C2 and C4 do not clearly align with international human rights expectations of companies, nor with the WBA Social Transformation Framework, with regard to the scope of responsibility.

The language of C2 states “The company respects the rights of legitimate tenure holders when acquiring, leasing or using land, paying particular attention to vulnerable tenure rights holders.” This phrasing suggests the company must only demonstrate it respects these rights in *its own* acquiring, leasing, and land use activities. However, the international expectation as clarified by the UNGPs is that companies respect human rights in their operations and *throughout their value chains*. The language of the second two elements, however, refer to the company’s suppliers.

We recommend:

- editing the Indicator to state that companies respect these rights “*throughout their value chains*.”
- considering under Element “c” not only supplier codes of conduct, but also contractual terms and expectations for all business relationships (both upstream and downstream).

- changing the language of Element “d” to state “The company works with suppliers *and other business relationships...*” (alternatives include: “value chain partners” or “value chain relationships”)

These changes related to the scope of coverage should also be considered throughout the benchmark’s indicators, including in indicator C4.

WBA should integrate the elements from the Land Rights indicator in its own [Food and Agriculture Benchmark](#) pertaining to grievance mechanisms. These elements seek to align with the expectations of the UNGPs, in line with the effectiveness criteria of [UNGP 31](#). This WBA indicator states:

- “The company provides a grievance mechanism that is accessible to external individuals and communities.
- The company describes its process for providing prompt and adequate remediation that includes access to justice when legitimate rights holders are negatively affected. Examples of remediation include restitution, compensation, rehabilitation, satisfaction and guarantees of non-repetition.”¹⁸

IV. Indicator C4: Indigenous Peoples’ Rights

C4 Indigenous people’s rights

Indicator: *The company respects indigenous peoples’ rights and engages with affected indigenous communities in its processes to decide whether or how to carry out projects.*

Rationale: *Indigenous peoples may be particularly vulnerable to the adverse impacts associated with project development, including risk of impoverishment and loss of identity, culture, and natural resource-based livelihoods (IFC, 2012 d). Protecting and securing indigenous peoples’ rights has been recognized as crucial to advance conservation, restoration and climate change mitigation and adaptation strategies (WRI, 2019).*

Elements:

- The company has a commitment to respect indigenous peoples’ rights or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No. 169 or of the UN Declaration on the Rights of Indigenous Peoples.*
- Where operations or proposed operations may impact on indigenous peoples, the company discloses its process to identify and recognise affected indigenous peoples and it describes how it engages directly with indigenous community(ies) in carrying out the assessment, following internationally recognised standards like free, prior and informed consent.*
- The company requires its suppliers to respect indigenous peoples’ rights in its supplier code of conduct, including the requirement to have a process to identify and recognise affected indigenous peoples and to engage with indigenous community(ies) in carrying out the assessment.*
- The company describes how it works with its supply chain partners to improve their practices in relation to respecting the rights of indigenous peoples.*

¹⁸ <https://assets.worldbenchmarkingalliance.org/app/uploads/2021/02/Food-and-Agriculture-Benchmark-methodology-report.pdf>

Consultation question

- *Should we also include active participation of these groups (beyond engagement) as an element of these indicators? Do you have feedback on how we can assess companies' disclosure and performance on the active participation of the communities into its operations/projects.*

The language of this indicator must be amended because it contains contradictory language that does not align with international law. It states, "The company respects indigenous peoples' rights", which include the right to self-determination, which is commonly held as one basis for the requirement of obtaining Indigenous Peoples' FPIC.¹⁹ The indicator then states the company "engages with affected indigenous communities." This erroneously implies that a standard much weaker than FPIC (i.e., engagement) equates with the respect of Indigenous Peoples' rights. Any consultation with Indigenous Peoples should be done with the objective of obtaining FPIC.

The indicator must be amended, and we propose the following language: "The company respects Indigenous Peoples' rights and obtains affected Indigenous Peoples'* free, prior and informed consent regarding whether and how to carry out projects."

*Please note that we have changed "indigenous communities" to "Indigenous Peoples" here and throughout our feedback.

To align with the UNGPs and existing corporate practice, we suggest replacing "or references the relevant part(s) of the ILO..." in element "a" to "or includes in its human rights policy commitment reference to the ILO..." In our work, we have seen company policies refer to these conventions and then in the next sentence negate them with weaker standards (e.g., "consultation", rather than FPIC, even though FPIC is included in those instruments.) Given this trend, it is important to include here not only that the reference to the instruments are made, but that "the companies' policies are consistent with, and do not undermine the standards within, those instruments."²⁰

In the text of Elements "b" and "d", rather than "engagement", "consultation" and "meaningfully enabling community participation in decision-making" should be used.

- Suggested language for Element "b": "... it describes how it consults directly with Indigenous Peoples in carrying out the assessment, following internationally recognized standards like free, prior and informed consent, and meaningfully enables Indigenous Peoples' participation in decision-making."
- Suggested language for Element "c": "The company includes the expectation of respecting Indigenous People's rights in its contracts with all business relationships, including the requirement to have a process to identify and recognize affected Indigenous Peoples and to obtain their free, prior and informed consent regarding whether and how to carry out projects."

¹⁹ <https://www.ecojesuit.com/wp-content/uploads/2014/09/Making-FPIC-a-Reality-Report.pdf>

²⁰ The components of FPIC include: 1. Free: Community members give or withhold consent voluntarily, without coercion, intimidation or manipulation. 2. Prior: Consent is obtained well before each stage of project authorization, and is actively sought and maintained on an ongoing basis throughout the life of a project. 3. Informed: Community members access, understand, and deliberate on all relevant project information before giving or withholding consent. 4. Consent: Community decisions to agree to, refuse, or offer conditional consent to projects or activities that affect their land or resources are respected. FPIC is not satisfied by companies carrying out "free, prior and informed consultation." <https://ccsi.columbia.edu/sites/default/files/content/docs/Briefing-FPIC-and-investment-approval-July-2020.pdf>

As noted under our feedback under C2, grievance mechanisms and remedy should be included in this indicator as well.

V. Additional Selected Consultation Questions

6. Do you have feedback on the proposed weighting of the measurement areas?

Due to the severe social and human rights impacts of both the degradation of ecosystems and the unintended consequences of some efforts to protect nature (discussed above), the 5% devoted to the transformation-specific social indicators is insufficient. As WBA recognizes, respect for human rights forms the foundation and baseline for responsible business conduct, so we suggest the weighting for the social indicators be at least 30% (20% for the core social indicators and 10% for the transformation-specific indicators). This would bring the benchmark in line with the weighting of the WBA Food and Beverage Benchmark.

18. When assessing restoration of ecosystems, is it better to focus solely on restoration of ecosystems degraded by the company's activities and/or supply chain, or do we need to include restoration activities beyond the scope of the company's value chain? (B10 – Ecosystem restoration)

It would make sense that companies' first and priority ecosystem restoration work focuses on ecosystems degraded by the company's activities and its value chain. Under a human rights framing, these activities may constitute remediating harm caused, contributed to, or linked to the company's operations and business relationships. Under a climate framing, these activities may be considered reduction of the company's scope 3 emissions. Companies also have existing relationships and influence over their value chains, so from the company perspective, this work may be more efficient. In keeping with the SBTi's approach of focusing on decarbonization of a company's Scope 1, 2, and 3 emissions, while going beyond the value chain may be effective, it should be considered akin to CSR or philanthropy, rather than a core responsibility.

Thus, we agree it makes sense to consider both "within own operations and/or value chain" and "beyond its value chain" separately, but companies should certainly not be punished for only engaging in restoration within their own operations and value chain. Rather, if this type of restoration is done well, it should be the gold standard, without a need to go beyond the value chain.

In our introductory note, we highlighted how conservation and restoration activities can pose risks to Indigenous Peoples, local communities, and human rights defenders. Accordingly, all activities should be undertaken while respecting human rights and enabling community participation in the design of restoration activities.

We suggest adding an element to B10 on respecting human rights throughout ecosystem restoration activities and enabling Indigenous Peoples and local communities' meaningful participation in their design, including enabling and resourcing community-driven solutions rather than top-down approaches that risk alienating Indigenous Peoples and local communities from their lands.