



Investigating the biodiversity impacts of investments by a pension fund

HEADLINES

THE BRIEFING OUTLINES LESSONS FROM ANALYSIS OF COMPANIES IN THE INVESTMENT PORTFOLIO OF A MAJOR PENSION FUND.

IT SUMMARISES:

• SOURCES OF INFORMATION USED AND HOW THEY WORKED

• BIODIVERSITY IMPACTS USED AS CRITERIA

• TYPE AND QUALITY OF COMPANY REPORTING

• OBSERVATIONS ON RESULTS

• KEY INFORMATION SOURCES

We reviewed almost 2,000 companies for a major pension fund in Europe, to identify investments seriously damaging biodiversity. This briefing explains how we did this and assesses the options and limitations of this kind of analysis.

Four sources of information were used:

- Mapping operations against protected areas and Key Biodiversity Areas using the Integrated Biodiversity Assessment Tool, IBAT
- Reference to company websites
- Web-based and literature searches
- Expert opinion and interviews from academics, activists and civil society groups

IBAT was useful for companies with geographically distinct operations, but less so for those with more diffuse operations or those purchasing products from multiple sources.

Company reporting is variable, dependent on previous criticism received, industry type, location, etc. The Sustainable Development Goals are an important indicator, although many companies still rely on old-fashioned corporate social responsibility reporting.

Web-based searches and interviews are a rich source of information but very time-consuming; in future more effective reporting networks are needed with more efficient search tools and tagging.

Impacts were classified as operations in or near protected areas, Ramsar sites and Key Biodiversity Areas, with some consideration of chain of custody. Species impacts were tricky to measure. Extractive industries had the highest number of impacts overall, but this may reflect methods used, with diffuse impacts from agriculture harder to identify.

This was a scoping study; the aim was to identify companies of concern and further detailed research is needed to confirm the findings.



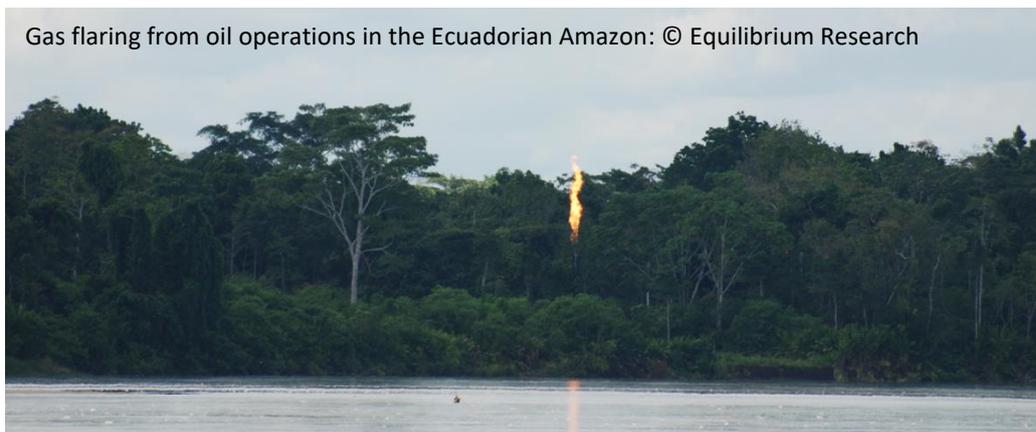
SOURCES OF INFORMATION

Four main approaches were used:

**IBAT WORKS
WELL WITH
COMPANIES THAT
HAVE DISCRETE
AND
GEOGRAPHICALLY
BOUNDED AREAS
OF OPERATION**

1. **Mapping of company operational locations using the Integrated Biodiversity Assessment Tool (IBAT)** developed by the UNEP World Conservation Monitoring Centre: This was the most precise way of getting location-specific data, although only worked for those companies where operations were discrete, geographically exact, locatable and relatively limited in extent (e.g., mines and hydropower dams). Upstream companies, sourcing from multiple different locations, or companies involved in dozens or hundreds of different projects, required a different approach.
2. **Reference to company websites:** Useful for getting a general idea of the type of business and the chances of it impacting on valuable areas, and also in many cases for geographic information about areas of operation (by no means all companies provide this and much of what is provided is partial). Company websites were also useful in providing information on sustainability policies: presence, absence and quality of reporting was very useful in determining the degree of awareness of and interest in biodiversity.

Gas flaring from oil operations in the Ecuadorian Amazon: © Equilibrium Research



3. **Web-based and literature searches:** We drew on specialised sites such as Mongabay and carried out generalised web searches using key words. These were useful; Wikipedia also often has information on controversies about companies, some but not all of which proved useful, particularly in providing additional sources to follow up. Standardised databases from Reuters and the *Financial Times* provide information on company activities; this is not always up to date.
4. **Expert opinion:** Specialists provided information and reviewed drafts. In particular, we worked with the Great Ape Specialist Group of the Species Survival Commission, who contacted all their members. While some of the reviews were useful, and we spoke to some very helpful people, these sources were generally less useful than we hoped. Many people were unable to provide hard information. Not surprisingly, asking specific questions, or focusing on one or two companies, worked better than asking people to review long lists of companies. We have developed suggestions about next steps, including building networks and standardising approaches.



IDENTIFYING IMPACTS ON BIODIVERSITY

“Impacts on biodiversity” are complex and hard to measure. We drew a shortlist of key indicators, based partly on accessibility to geographically explicit data, shown in Table 1. This focuses on areas of high importance to biodiversity. While we explored analysis using key species (e.g., in the IUCN Red List) this proved less useful in practice.

Table 1: Sites/areas of importance

| Criterion | Reason |
|---|---|
| Protected areas (primarily categories I-IV) | Protected area categories I-IV are all used in various countries to identify fairly strict protection. We drew on the <i>Protected Planet</i> website, which includes all protected areas. |
| Key Biodiversity Areas | These rely heavily on bird data and coverage is incomplete; the fact that an area is not a KBA may mean there has been no analysis. Even so, they are a useful marker and coverage will increase over time. |
| Ramsar sites | Wetlands of importance mostly also protected areas; all are committed to “wise use”. Mapped globally but the website proved difficult to use when searching coordinates or using satellite imagery. Many Ramsar sites are represented as point data making it hard to assess overlaps from operational sites. |
| Ecologically or Biologically Significant Marine Areas | These remain the most useful marine designation beyond marine protected areas and have been mapped. We did not find this a particularly useful dataset in the present instance, particularly as fishing locations are so difficult to determine. |
| Biodiversity Hotspots | These are useful in part because they focus on endemic plants but omit key areas (e.g., Amazon, Congo Basin). They cover enormous, often highly urbanised, areas so while they help focus research, did not prove useful as a criterion of high risk. |

PROTECTED AREAS AND RAMSAR SITES ARE THE MOST COMMONLY REFERENCED AREAS IN COMPANY REPORTS, AND YET EVEN THESE WERE SELDOM MENTIONED

Protected areas and Ramsar sites were most often referenced in company reporting; there was little or no mention of KBAs. For location-specific, mappable operations, IBAT identified overlaps with KBAs and PAs, but was less useful in sectors with widespread operations. IUCN advises that KBAs need not all be protected, but rather managed to maintain their values, so if operations overlap a KBA, analysis is needed to find if the impact is negative. Under current plans from the Convention on Biological Diversity, area-based conservation is set to expand to 30% of land surface, and over 60 nations have pledged to meet this. KBAs are likely to be increasingly important indicators in the future, in identifying potential conservation areas.

Chain of custody data are harder to find, although for companies involved in high-risk commodities with a voluntary certification scheme, the presence or absence of reference to certification gives a useful first indication of the risks of impacts on biodiversity.

Quantitative, site-specific evidence is rare; a few high-profile developments receive a lot of media attention, while many others carry on unnoticed. Some material from activist groups is useful, others tend to regard all developments as bad, and it is hard to distinguish explicit, data-rich examples. While there is much information on exploitation of labour and conflicts with communities, perhaps unsurprisingly there is less data quantifying negative impacts on biodiversity and less still connecting impacts to threatened species.



COMPANY REPORTING

The extent to which a company is open about environmental policies, commitments and actions depends on factors such as level of controversy, prior exposure to criticism, how public facing it is, and awareness amongst senior staff. Options are shown in Figure 1.

| | | | |
|---|---|--|---|
| Criticism of the sector from civil society | ↑ | Companies working in controversial areas in developing countries – some reporting but generally focusing on Corporate Social Responsibility and projects (tree planting etc.) by staff volunteers. | Companies working in controversial areas (e.g., oil and gas) in developed countries (or sometimes producers selling to developed countries) – generally high attention paid to sustainability reporting, links to SDGs, hard data, commitments. |
| | ↓ | Companies working in less controversial areas in developing countries – often no sustainability reporting at all, or perhaps a single mention on the website, again usually focusing on projects. | Companies working in less controversial areas in developed countries – usually have sustainability reporting but generally ignore or pay lip service to biodiversity, focus on climate change, waste reduction etc. |
| | | → | |
| | | Wealth of nation where the company is located | |

Figure 1: Different approaches to sustainability reporting

SUSTAINABILITY REPORTING BY COMPANIES IS HUGELY VARIABLE AND BIODIVERSITY CONSIDERATIONS ARE OFTEN OMITTED ALTOGETHER. BETTER GUIDANCE ON BIODIVERSITY REPORTING BY COMPANIES IS URGENTLY NEEDED

- Most companies report on *policies* (often general), rather than *performance* (against their own principles or requests from NGOs, the public or governments).
- Many companies have **annual sustainability reports**, varying from glossy reviews with vague commitments, to data-rich analyses of targets, impacts and progress.
- Very few refer directly to **protected areas** and we found none that referred to **key biodiversity areas**. More mentioned the IUCN Red List.
- The **Sustainable Development Goals** are often cited; some companies report against all 17; others identify a few considered relevant. Reporting against SDGs 14-15 on biodiversity is usually vague or absent. (This matches other research, analysis of 729 companies¹ found 72% cited SDGs but only 2% identified indicators or targets.)
- **Corporate Social Responsibility** reporting is common, especially in Asia. Reports are often simplistic, focus on projects or donations (e.g., tree-planting) rather than analysis of the company's own operations.
- **Chain of custody** reporting is common in parts of the food sector. Many companies refer to **voluntary certification schemes** like the Roundtable on Sustainable Palm Oil, but few specify the proportion of their products certified.
- **Biodiversity** is under-represented in reporting, compared to climate change or recycling. A few exceptional companies report in detail.
- Watchdogs, journalists and NGOs often give vague information on PAs and KBAs; do not link to the World Database on Protected Areas or the KBA database, and do not provide standard company identification numbers.
- Generally, companies in Europe and North America provide the best information and those involved in the extractives and food industries have the most detailed reports.

1. PwC. 2018. *From Promise to Reality: Does business really care about the SDGs? And what needs to happen to turn words into action*. PWC, London



SOME OBSERVATIONS ON THE RESULTS

The results remain confidential; the following notes describe factors relevant to other researchers. We divided companies into five broad sectors, by main interest. Many larger companies (e.g. Korean *chaebol*) cover a huge array of goods and products and offer services (e.g., consultancy) and management (e.g., property rental) alongside production.

1. **Mining:** the extractive industries had the largest direct impact identified, but this is partly because they operate in sites with fixed boundaries that can be mapped against spatial conservation parameters. There were some clear operational overlaps with PAs and/or KBAs where no additional information could be found on impacts; this seems to indicate a gap in reporting (both by watchdogs and the company itself).
2. **Agri-forestry:** probably has more impact but is hard to pin down; a dairy products company likely relies on feed containing soy and palm oil, which may come from deforested areas. But this needs a level of inquiry not feasible if a fund has thousands of investments. Many companies refer to voluntary certification schemes like the RSPO, but it is often unclear whether all or only part of their products are certified.
3. **Energy:** larger fossil fuel companies with multiple sites often have operations in or near protected areas or KBAs, “near” being especially pertinent for marine sites. HEP companies may impact PAs and KBAs downstream. Major transmission companies often have power lines crossing protected areas; the risks to biodiversity are debated. A minority have policies to avoid important areas and take mitigation action.
4. **Infrastructure:** Most activities are irrelevant, occurring in urban or industrial sites; exceptions are dams, transport infrastructure and greenfield development. Operations of many large companies are hard to identify. Limestone and gypsum quarrying for cement production has devastating impacts; this sector reports little on biodiversity.
5. **Chemicals:** Most of these companies do not have a direct impact on biodiversity as defined in this analysis. However, many – perhaps most – will be causing significant environmental damage in their production processes or products, e.g., making and selling pesticides and fertilizers. It might be worth looking, for instance more closely at those selling particularly toxic active ingredients.

NEXT STEPS

As part of the follow up to this process, we will develop best practice guidance on biodiversity reporting, along with sources of information and advice.

This briefing was written by Nigel Dudley and Hannah Timmins. Reproduction is encouraged but only for non-profit purposes, with full acknowledgements. Comments, criticism and ideas are welcome. Many thanks to the people who helped us; due to the confidential nature of this research we can't name you here, but we remain deeply grateful.

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APPENDIX: INFORMATION SOURCES

Some of the key sources of information used to identify impacts.

| Source | Location | Business data | Ecological data | Impact data |
|---|---------------------------------|---|---|--|
| Global Forest Watch | Global | Logging concessions | Biodiversity intactness | Fire alerts |
| | | Mining concessions | Global biodiversity significance | Tree cover loss (by driver) |
| | | Oil Palm concessions | Alliance for Zero Extinction sites | GLAD Deforestation Alerts |
| | | Palm Oil mills | Key Biodiversity Areas | Emerging hotspots |
| | | RTRS Guides for Responsible Soy | Mangrove biomass density | CO ₂ emissions from tree loss and peat |
| | | RSPO oil palm concessions | Tiger Conservation Landscapes (WWF) | Terra-i Deforestation Alerts |
| | | Oil & gas concessions | Endemic Bird Areas | |
| | | Landcover: Agriculture | Tree biomass density | |
| | | Major dams | Soil carbon density | |
| | | Tree plantations | Biodiversity Hotspots | |
| | | Wood fibre concessions | Potential carbon sequestration rate | |
| | | | Tree cover | |
| | | | Primary forests | |
| | | | Intact forest landscapes | |
| https://www.globalforestwatch.org/ | | | | |
| Global Dam Watch | Global | Georeferenced dams | | |
| http://globaldamwatch.org/ | | | | |
| Database of dams in PAs | Global | | | |
| https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12719 | | | | |
| Proyecto AMBIODUCTO | Ecuador Amazon | Petroleum | | |
| http://geodata.policysupport.org/ambioducto | | | | |
| Co\$ting Nature | Global | Global surface mines Oil and gas, etc | | |
| http://www.ambiotek.com/mapping/partners/costingnature/pc_wc_pop/geapi_def.html | | | | |
| Oil Watch | Global | Links to country action networks | | |
| https://www.oilwatch.org/links/ | | | | |
| Eyes on the Forest | Sumatra, Indonesia | Pulp and paper - concessions, mills and transportation corridors Palm oil - mills, refineries, illegal plantations, | Government and customary PAs, ranges of rhino, orangutan, elephant, tiger, eco-floristic diversity, extinction risk, carbon storage | Hotspots and haze monitoring, elephant deaths |
| Interactive map - http://maps.eyesontheforest.or.id/ | | | | |
| Mongabay | Global - can search by location | Agriculture, Amazon soy, biofuels, cattle ranching, coal, dams and hydropower, energy, fishing, fossil fuels, logging, mining, oil, palm oil, pulp and paper, soy | | Multiple sources of information on individual projects |



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|--|---|---|--------------------------------------|---|
| Search bar: https://news.mongabay.com/list/business/ | | | | |
| Orbital Insight | Global | | | |
| Pay-to-use platform - https://orbitalinsight.com/resources/how-to-use-go | | | | |
| Global Witness | Global | Many | | |
| https://www.globalwitness.org/search/?search_query=golden+agri+resources&order=relevance&tab=pages | | | | |
| Extractive Industries Transparency Initiative | Global | Extractives | | |
| https://eti.org/ . Reports for individual countries found: https://drive.google.com/drive/folders/OB361RU22DTPfZ1JsQTZ5Y09DdTA | | | | |
| Responsible Mining Map | Global | Business names | | Only responsible mines on the map |
| https://map.responsiblemining.net/ | | | | |
| Forest Governance and Legality | Map of strong-weak forest governance – global | Illegal timber, pulp and paper hotspots | | |
| https://forestgovernance.chathamhouse.org/ | | | | |
| Forest Peoples Programme | Global | | | Reports by trade |
| https://www.forestpeoples.org/en/resources | | | | |
| Mined Amazon | Amazon | Mine concession shapes, corporation names, years active, active mines, ore type | Protected area names | |
| https://infoamazonia.org/en/maps/amazoniaminada/#!/story=post-61441&loc=-6.217012327817175,-57.755126953125,7 | | | | |
| SkyTruth Toolbox | Gulf of Mexico | | | Oil spills |
| | Global | | | Flaring maps |
| | Parts of the USA | | | Mountaintop mining maps and data |
| https://skytruth.org/toolbox/ | | | | |
| Global Fishing Watch | Global | Vessel names, fishing effort | MPAs (plus No-Take zones) | |
| https://globalfishingwatch.org/ | | | | |
| Environmental Investigation Agency | | | | Deforestation, illegal logging and timber trafficking |
| https://eia-international.org/ | | | | |
| Mining Watch Canada | Global | Companies | Conservation values of the area | Recent stories on global impacts |
| https://miningwatch.ca/ | | | | |
| International Rivers | Global | Companies | | Impacts on rivers |
| https://www.internationalrivers.org/ | | | | |
| Mekong Reservoir Mapping Tool | Mekong | Dams and Reservoirs - locations and operational data | | |
| http://damtool-servir.adpc.net/ | | | | |
| SPOTT | Global | Transparency and traceability rankings for oil palm, pulp and timber and rubber | Identification of species of concern | Absence/presence of deforestation monitoring |
| https://www.spott.org/dashboard | | | | |

