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1 **The global extent of biodiversity offset implementation under no net**
2 **loss policies**

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28 'No net loss' (NNL) biodiversity policies, which seek to neutralize ongoing biodiversity losses
29 caused by economic development activities, are applicable worldwide. Yet there has been no
30 global assessment concerning practical measures actually implemented under NNL policies.
31 Here, we systematically map the global implementation of biodiversity offsets ('offsets') – a
32 crucial yet controversial NNL practice. We find, firstly, that offsets occupy an area up to two
33 orders of magnitude larger than previously suggested: 12,983 offset projects extending over
34 $153,679_{-64,223}^{+25,013}$ km² across 37 countries. Secondly, offsets are far from homogeneous in
35 implementation, and emerging economies (particularly in South America) are more dominant in
36 terms of global offsetting area than expected. Thirdly, most offset projects are very small, and the
37 overwhelming majority (99.7%) arise through regulatory requirements rather than prominent
38 project finance safeguards. Our database provides a sampling frame via which future studies
39 could evaluate the efficacy of NNL policies.

40 **No Net Loss of biodiversity**

41 Halting global biodiversity loss is one of the leading sustainability challenges of the 21st Century [1].
42 Impacts associated with economic development (e.g. agricultural expansion, infrastructure development,
43 urbanization, resource extraction) are the most significant anthropogenic drivers of biodiversity decline [2,
44 3]. In turn, arresting further declines will in part require the implementation of environmental policy
45 principles designed to reduce biodiversity losses associated with economic development. One such policy
46 principle is 'no net loss' (NNL). Rooted in US and German nature conservation policies in the 1970s, the
47 NNL principle has become widespread, and has now been estimated to be part of public policy for 69 [4,
48 5] to as many as 108 [6] countries globally. Essentially, NNL requires the detailed quantification of
49 predicted biodiversity losses associated with development projects, and the application of a 'mitigation
50 hierarchy' to those losses. The mitigation hierarchy generally takes the form 'avoid, minimize, remediate,
51 offset', designating the sequentially preferred actions to be applied to meet the ultimate objective of
52 ensuring a neutral net biodiversity outcome [7]. The final stage in the mitigation hierarchy – biodiversity
53 offsetting, whereby residual predicted losses are fully compensated for via the prevention of unrelated
54 losses ('avoided loss'), or ecological restoration measures elsewhere [5] – raises a host of practical and
55 ethical concerns, including the moral acceptability of trading in losses and gains of components of
56 biodiversity [8, 9]. Nonetheless, NNL policies (and particularly biodiversity offsets) have generated much
57 interest amongst conservationists and policymakers, in turn becoming the subject of extensive research
58 [10].

59

60 *Implementation of No Net Loss biodiversity policies*

61 Yet despite 40 years of policy evolution, there has so far been no comprehensive worldwide assessment
62 of the scale upon which conservation activities arising via NNL policies have actually been carried out,
63 nor how they are distributed [4, 11]. This lack of evidence means that it is impossible to make
64 generalizations about the impact of NNL policy, or characteristics of NNL implementation. In turn, it
65 remains unclear e.g. to what degree biodiversity loss is prevented during development activities, to what
66 extent compensatory mitigation activities tend to involve ecosystem restoration over the more nuanced

67 practice of avoided loss offsets [5], whether the mitigation hierarchy tends to be implemented in habitats
68 that are feasible targets for restoration activities – and, ultimately, how effective mitigation activities have
69 been in striving towards achieving NNL. The bulk of the NNL literature is theoretical, and analyses of
70 implementation have to date focused on specific projects (e.g. [12-14]) or subnational regions (e.g. [15]).
71 This lack of information on the extent and nature of global NNL implementation hampers efforts to make
72 clear, empirical statements concerning controversies surrounding NNL, facilitate evidence-based NNL
73 policy development, and ultimately, evaluate the contribution made by NNL to biodiversity conservation.
74 The need to assess the validity of NNL as an approach has become increasingly pressing, with the
75 introduction of far-reaching policies supporting its use [4].

76
77 However, simultaneously mapping the implementation of all components of the mitigation hierarchy
78 enforced under NNL policies is not currently technically feasible (see [16] on ‘avoidance’ measures in US
79 NNL policy). Biodiversity offsets (‘offsets’), however, are the most visible and readily identifiable outcome
80 of NNL policies. Therefore, here, we provide a first current and realistic order-of-magnitude estimate for
81 how many biodiversity offsets have been implemented under NNL policy globally, and where these are
82 distributed. Our findings are not only of interest in shining a light on key descriptive statistics concerning
83 offset implementation – additionally, our study effectively provides a global sampling frame for use in
84 future empirical studies seeking to evaluate the general effectiveness of NNL. Note that we did not seek
85 to obtain data on the general effectiveness of offset projects (in terms of achieving biodiversity
86 conservation objectives) as part of this study, and doing so would require an entirely different
87 experimental design. We note, however, that understanding the effectiveness of offsetting is a crucial
88 long-term goal for future NNL research.

89

90 **Results**

91 We find evidence for 12,983 biodiversity offset projects that are currently completed or in the process of
92 implementation, occupying at least $153,679_{-64,223}^{+25,013}$ km² worldwide (note the asymmetrical positive and
93 negative uncertainty bounds). For context, the previous best estimates of global offset coverage by area

94 were ~ 2,000 km² and ~ 85,000 km² [17], and the largest global offset dataset previously constructed
95 contains 70 offset projects [18], though not all offsets included had commenced implementation in any of
96 these cases. The offset projects in our database (Supplementary Information 1) range in size from those
97 that occupy a negligible area to one that occupies some 50,000 km² (the latter being associated with the
98 Oyu Tolgoi mine in Mongolia, an areal figure which is open to substantial interpretation). It is of note that
99 the three largest single offset projects in the database – the aforementioned offset for Oyu Tolgoi, the
100 Uatumã Biological Reserve in Brazil (compensating for the Balbina hydropower plant), and the Saigachy
101 reserve in Uzbekistan (compensating for multiple extractive sector activities) – together constitute ~ 43%
102 of the total areal estimate in the database (Supplementary Information 1). Though these large projects
103 represent a substantial proportion of that areal estimate, the median area occupied by offsets is 0.021
104 km², and the overwhelming majority (92.9%) of offset projects are small, in that they occupy an area < 1
105 km².

106

107 *Geographical distribution*

108 Geographically, offset projects can be found on every major continent except Antarctica (Fig. 1A; Table
109 1). The majority of biodiversity offset research by output has largely been carried out by academics based
110 in North America, Western Europe and Australasia [10] – and, perhaps unsurprisingly, these regions also
111 feature high numbers of offset projects (Australia, n = 395; Canada, n = 473; Western Europe, n = 1,824;
112 the US, n = 1,729; Fig. 2; Table 1). However, even though the data obtained are less detailed and reliable
113 (according to our definitions of those terms – see Methods), even higher numbers of offset projects have
114 been recorded in Brazil (n = 2,514) and Mexico (n = 5,970). Indeed, the region containing the greatest
115 proportion of offsets, by area, is Central and South America (69,508 km², or ~ 45% of the total estimated;
116 see Fig. 2). Despite the publication of specific articles relating to key countries in Central and South
117 America for offset activity – notably Brazil [19], Colombia [20], and Mexico [21] – the region has
118 proportionally received less intensive research attention than elsewhere [10, 22]. Combined with the
119 recorded offset activity in Africa (13,684 km²) and Asia (64,127 km², a figure which incorporates the

120 aforementioned Oyu Tolgoi project offset), the bulk of offset activities both numerically and by area are
121 located in less industrialized and emerging economies (Fig. 2).

122

123 We obtain point locations for 3,416 of the offsets in the database (Supplementary Information 1),
124 providing the opportunity to map offset implementation on a finer (i.e. sub-national) spatial scale for some
125 regions (the Americas, Australasia, Europe, and sub-Saharan Africa; Fig. 1B). Point location data could
126 not be found for Brazil, China, or Mexico despite extensive documented offsetting activity (Table 1). We
127 found no evidence for any NNL policies leading to offsets being implemented in the high seas, despite
128 marine NNL policies existing [23] and being included within our scope – hence the apparent focus of the
129 database on terrestrial and coastal regions.

130

131 *Biodiversity offset characteristics*

132 Driver for implementing offsets

133 By far the most common driver for implementing offset projects numerically is public environmental policy
134 (99.7% of all projects), with the remainder driven by requirements from lending institutions that co-finance
135 development projects (~ 0.15%) or by voluntary corporate commitments (also ~ 0.15%). However, those
136 implemented in response to lender requirements and corporate commitments tend to be much larger (Fig.
137 3) and so occupy a disproportionately large area (= 72,651 km², compared to 81,028 km² occupied by
138 those offsets driven by public policy). Indeed, offsets can effectively be divided into two entirely different
139 classes: those driven by public policy (which are numerous, and tend to be relatively small), and those
140 driven by lender or corporate requirements (which are rare, but tend to be extremely large; Fig. 3). Of
141 particular interest is the fact that worldwide only 8 projects have so far commenced implementation as a
142 direct requirement from the International Finance Corporation under their Performance Standard 6 (IFC
143 PS6; [24]), despite the fact that PS6 is highly influential and widely considered best practice [25].

144

145 Biodiversity offset activities

146 Biodiversity offsets are considered typically to seek to achieve NNL either through active ecosystem
147 restoration or through the prevention of anticipated biodiversity losses ('avoided loss' offsets), both of
148 which result in biodiversity gains depending upon the reference scenario [5]. We find that, overall, 19.9%
149 of offset projects implement avoided loss measures, 18.8% implement ecological restoration, and another
150 46.4% seek some combination of the two approaches (leaving 7.3% of offsets that take 'other'
151 approaches, and 7.7% unknown).

152

153 The approach taken in terms of offset activities varies dramatically by country: for Australia and Sweden,
154 avoided loss offsets constitute < 10% of known offsets – though they constitute 69% of offsets in South
155 Africa, and likely a higher proportion in Australia when accounting for unknowns (see [26]). 'Other'
156 activities (e.g. financial offsets) are much less widely observed (Table 1). Regarding largescale regional
157 spatial trends, the majority of offsets in North America, Europe and China implement ecological
158 restoration activities, whilst avoided loss activities represent a greater proportion of offsets in the southern
159 hemisphere (Australasia, sub-Saharan Africa).

160

161 Habitat types

162 The majority of offset projects are implemented in forests (66.7%) or wetlands (17.5%), though the
163 enormous projects in the steppe and semi-arid habitats of Mongolia (associated with Oyu Tolgoi) and
164 Uzbekistan (the Saigachy reserve) are notable exceptions (Table 1). We did not anticipate the
165 widespread implementation of offsets in forests, relative to wetlands and grasslands. This may have been
166 because wetland and grassland offsets tend to constitute a large proportion of activity in more heavily
167 industrialized regions (Australia, Europe, North America; Table 1) which are the source of much of the
168 published academic literature on offsets [10].

169

170 Regarding that subset of offset projects for which point locations are available (n = 3,416), we also
171 considered the larger scale landscape context within which offsets were implemented. To do so, we

172 assessed known offset locations against the 827 terrestrial eco-regions defined by the World Wildlife
173 Fund. The relevant shapefiles were obtained through The Nature Conservancy's spatial data repository
174 [27], and offset point locations overlaid upon eco-region polygons in the open access software Quantum
175 GIS. The analysis confirmed that offsets have been implemented across the full range of terrestrial eco-
176 regions, but with the majority (92%) being located in boreal, Mediterranean, temperate and tropical forest
177 biomes (7% are found in grassland biomes, including flooded grasslands). Note, again, that this
178 represents a subset of the offset projects in the database.

179

180 **Discussion**

181 *Significance and policy relevance*

182 None of the global offset studies cited [17, 18] claim to be a comprehensive evaluation, so would be
183 expected to underestimate offset implementation, even though they were not limited strictly to biodiversity
184 offsets in the process of implementation. Nonetheless, we did not anticipate the magnitude of our findings
185 – over ten thousand projects occupying an area of over one hundred thousand square kilometers – an
186 important outcome in itself. The implication is that, despite hundreds of journal articles on the topic [10],
187 the global offset portfolio has grown more quickly and is far more widespread than could previously have
188 been realized. By way of comparison, the offset portfolio captured by our database is currently ~ 1% the
189 size of the global terrestrial protected area network [28], though the first offset policies were only
190 developed in the 1970s [4]. We note that the conservation outcomes of offsets, and their contribution
191 towards a NNL objective, cannot be determined based upon the area they occupy alone. However, the
192 fact of this rapid and widespread growth suggests a degree of urgency in terms of evaluating whether and
193 when offsetting can prove effective in supporting achieving NNL, and that offset outcomes are more
194 closely and transparently monitored.

195

196 Further, we demonstrate that there is substantial variation in the density, extent and type of offset project
197 by geographical location and by policy driver. Biodiversity offset projects are far from homogeneous in
198 implementation. In turn, this suggests that offsets may be better grouped for analysis of effectiveness by

199 their characteristic traits (e.g. associated policy driver, policy specifications) than by their geography, if at
200 all. In fact, the degree of heterogeneity in implementation suggests that it is questionable whether
201 generalizations about findings on offset performance should be made at all. Importantly, our finding that
202 certain regions (particularly South America) are more dominant in terms of global offsetting activity than
203 might have been expected could shift research priorities. To even begin to understand the conservation
204 outcomes of offsetting, increased research focus will need to be upon the bulk of the extant offset
205 portfolio by extent (South America, Africa and Asia) rather than where it currently rests (North America,
206 Europe, Australia [10]).

207

208 To a first approximation, all offset projects have so far arisen through regulatory requirements.
209 Examination of our database (Supplementary Information 1; see also Fig. 1, Table 1) suggests that
210 regulatory NNL-type policies result in networks of small offset sites, likely with limited landscape-scale
211 coordination. An important implication is that offset activity may primarily translate into a network that
212 does not necessarily have substantial landscape conservation value. Equally, where these sites are
213 privately owned, considerable existing biodiversity values could be being locked up in an uncoordinated
214 network of mini 'private protected areas', which could in turn complicate both monitoring of biodiversity
215 trends and public access to biodiversity value (see [29]). The latter point deserves further research
216 attention (see 'further uses').

217

218 Our database does suggest that financial lender safeguards (including, but not limited to, IFC PS6) and
219 voluntary corporate commitments [see 30] have not yet led to the implementation of many offset projects
220 on the ground (n = 22 and n = 20 projects, respectively). Yet, given examples in our database – such as
221 those projects in Madagascar, Mongolia and Uzbekistan – developers will apparently countenance rather
222 enormous and ambitious conservation interventions if project finance requirements do specify a need to
223 seek NNL. These insights potentially provide arguments both for and against any contention that non-
224 regulatory NNL policies are viable routes towards implementing large-scale nature conservation
225 measures.

226

227 *Data limitations*

228 The global offset data presented here range widely in quality – from those obtained via detailed, likely
229 comprehensive and reliable government registers (e.g. Australia), to those inconsistently regionally
230 collated via reliable and detailed registers (e.g. Germany), to incomplete headline figures in the grey
231 literature (e.g. China). An important component of our results is consequently the estimates of uncertainty
232 bounds in the area occupied by offset projects, via the application of a systematic protocol (see Methods).
233 Though necessarily estimated, these bounds illustrate the degree of uncertainty in our overall estimate for
234 the area occupied by offsets. In turn, we note that our database represents an order of magnitude
235 estimate of existing implementation.

236

237 A key limitation to the construction of the database is that our search was carried out primarily in English
238 (see Methods). To give some qualitative indication of the effect of this limitation, by continent: (1) in North
239 America, English is the primary regional language, and most information on offset projects is likely
240 available in English. Consequently, searching in English is unlikely to constitute a limitation here. (2) In
241 South America, offsets implemented as a result of lender requirements (e.g. the Inter-American
242 Development Bank) were typically accompanied by English language documentation. Offsets
243 implemented in response to national regulation were less straightforward: whilst for key countries (e.g.
244 Brazil, Mexico) some information is available in the English-language literature, those countries remain a
245 key gap for the authors in terms of fully understanding implementation. (3) European offset data were
246 sourced via collaboration with non-English language speakers (Dutch, French, Spanish and German) on
247 a previous project [11]. Data collected for Sweden were contrasted with a comparable national study
248 published in English [31], confirming that those findings were on a reasonable order of magnitude. UK
249 data are available in English. A previous study suggests that most offsetting activity in Europe would be
250 captured via these languages alone [32]. We are consequently confident that European offset
251 implementation is captured as far as is currently feasible. (4) Sources of offset-related policy development
252 in Africa [4, 6] suggest that most offsets currently implemented (with the exception of South Africa) result
253 via lender or corporate requirements. For such projects, project documentation was generally available in

254 English. The public biodiversity offset register sourced for South Africa is in English. We are thus
255 confident that searching in English does not represent a substantial limitation for African offsets. (5) For
256 Asia, after searching on keywords in English, the authors were able to utilize Russian language skills to
257 interpret information on offsets in Russia and the former Soviet states (e.g. Kazakhstan, Uzbekistan).
258 Extensive English language literature is available for the major offset project in Mongolia (Table 1).
259 Conversely, China and Southeast Asia were problematic regions for our study in linguistic terms, and
260 data were relatively inaccessible. (6) English is the primary language within Australasia, so again
261 searching in English was unlikely to constitute a limitation. In sum – whilst our regional findings should
262 absolutely be viewed in light of linguistic limitations, we do not consider them to invalidate the overall
263 conclusions.

264

265 Our approach to consulting experts on the completeness and validity of the data we had obtained was to
266 use a process of chain referral (see Methods). Whilst such an approach is effective from the perspective
267 of identifying key individuals and eliciting understanding from them, it is less systematic than seeking a
268 random and institutionally representative sample of experts [33]. Furthermore, using chain referral could
269 feasibly have introduced biases to our data collection e.g. if our extended network of offset researchers
270 has no connection to parallel networks in different geographical regions or disciplinary fields. In turn,
271 where we classify certain datasets as not being detailed or reliable, this could reflect our methodology as
272 well as the data themselves. However, developing a truly random sample of experts for consultation –
273 stratified by e.g. geographical region, or driver for offsets – was not feasible for this study, due to the lack
274 of any global sampling frame for offset activity or NNL implementation more generally. Therefore, we
275 considered chain referral the best available approach.

276

277 Certain data presented here suffer from problems with accessibility. Some data licenses in Germany, for
278 example, prevent the replication of the data themselves elsewhere (though the data are publically
279 available, and we can present the *results* of analyses). A proportion of the data from Australia are not
280 available publically, and were provided in relation to our study under agreement that the raw data

281 themselves would not be shared. Finally, data on offset projects associated with financial lenders and
282 businesses are not systematically stored online, and an overview was obtained by speaking with expert
283 contacts within the organizations themselves. These are known challenges to the evaluation of NNL
284 implementation [11], and highlight the importance of the progress made in the present study. We
285 considered problems with accessibility when developing our uncertainty protocol (e.g. uncertainties
286 concerning the degree of completeness in the data; uncertainty about whether offset implementation has
287 been overestimated or falsely claimed by responsible parties). Consequently, we have attempted to
288 account for these potential sources of uncertainty in reporting our overall findings (see Methods).

289

290 *Further uses*

291 Despite the limitations discussed, our database constitutes a first global sampling frame for use in
292 inferential offset research, and a foundation upon which a database for NNL interventions more broadly
293 could eventually be constructed. It is imperative that an empirical assessment of NNL implementation be
294 carried out, to enable development of genuinely evidence-based policy. The information contained in our
295 database does not provide a basis for judging the performance of NNL policies. However, the goal of this
296 study was never to judge the performance of NNL policy, as we have made explicit – rather, our focus
297 here was to understand the extent to which NNL policies have resulted in conservation activity on the
298 ground i.e. implementation. Our (present) study into NNL implementation builds on previous studies into
299 global NNL policy development [4], and is a crucial intermediate step towards eventually evaluating the
300 performance of NNL policies. The latter would require on the ground assessment of all or samples of the
301 individual projects reported in this database.

302

303 Our database already informs previously key unknowns in offsetting (global extent, typical characteristics,
304 dominant offset management activities, habitats commonly affected), but could be expanded to explore
305 other important considerations. For instance, the need for offsets to represent ‘like-for-like’ gains where
306 possible [34], or for spatial proximity between developments and associated offsets [35]. Issues like
307 these, concerning whether to permit flexibility in offsetting [36], could be explored by interrogating our

308 database and expanding it to include information on associated development projects. Such information
309 is currently a relatively small component of the data collated (Fig. 1B; Supplementary Information 1). An
310 equally important extension would be to establish which actors become the ultimate owner of offset
311 projects. If offsets represent an increasingly substantial approach to nature conservation, and offsets are
312 predominantly implemented on private land, then policymakers should be concerned about a transfer of
313 biodiversity value into private ownership. Whilst not necessarily a problem in terms of the maintenance of
314 biodiversity, such an outcome might hinder public access to nature and the provision of cultural
315 ecosystem services [37].

316

317 Beyond questions regarding biodiversity offsets, our database provides a basis for exploring NNL policy
318 implementation more broadly. To date, much of the literature on NNL policy has focused on offsetting,
319 with relatively little on the other components of the mitigation hierarchy e.g. avoidance measures. Yet,
320 impact avoidance might be considered the key objective for NNL by conservation stakeholders [13, 14,
321 16]. To explore this in detail, our database would have to incorporate newly generated data on the
322 avoidance, minimization and remediation measures preceding each biodiversity offset in association with
323 the relevant development/s. This endeavor would require substantial investment and resources to
324 undertake, and since primary data collection would be necessary it would not be technically possible on
325 the basis of the approach we have taken here. However, undertaking such an assessment is the only way
326 in which we will ever be able to truly assess to what degree NNL policy could be resulting in negative,
327 neutral or even positive outcomes for nature.

328 **Methods**

329 *Drivers for biodiversity offsets*

330 We carried out a form of Systematic Mapping exercise, which are exercises that “do not aim to answer a
331 specific question, but instead collate, describe and map findings in terms of distribution and abundance of
332 evidence” [38]. It was not appropriate to develop a sampling strategy, as we were concerned with carrying
333 out a census of biodiversity offset projects globally. We defined the scope of the census guided by the
334 starting assumption (see [4]) that No Net Loss (NNL) is primarily enabled through three drivers: (a)
335 government policies; (b) project finance performance requirements; and, (c) internal corporate policies.
336 Accordingly, our census incorporated offsets implemented (a) within the relevant countries (n = 69; [4]),
337 (b) via projects financed by the relevant development banks or members of the Equator Group (n = 6 and
338 n = 92 respectively; [39]), and (c) companies with known NNL-type corporate policies (n = 32; [30]). Note
339 that, according to the newly developed GIBOP database [6], the number of countries that have policy in
340 place which enables biodiversity offsets (Stages 2 – 3, according to the GIBOP definition) could be as
341 high as 108. However, since this database remains a test portal, and has not been peer-reviewed, we use
342 the value stated by Maron et al. [4].

343

344 *Definitions*

345 We excluded any so-called offset projects that were not associated, either explicitly or implicitly, with a
346 NNL objective, i.e. “(1) they provide additional substitution or replacement for unavoidable negative
347 impacts of human activity on biodiversity, (2) they involve measurable, comparable biodiversity losses
348 and gains, and (3) they demonstrably achieve, as a minimum, no net loss of biodiversity” [9]. For the
349 avoidance of doubt:

- 350 • We include all offsets that arise from policies with a specific NNL objective and which attempt to
351 evaluate full and quantifiable compensation for development impacts (e.g. US wetland banking);
- 352 • We include offsets for which the goal is to fully and quantifiably compensate for development
353 impacts, even if an NNL objective is not stated in so many words i.e. an implicit NNL objective
354 (e.g. the UK pilot biodiversity offset policy). This recognises that in some instances offsets can
355 arise in the absence of a clearly stated NNL goal; and,

- We do not include any offsets implemented under a policy that has no requirement for full and quantifiable compensation for development impacts (even if a NNL objective is claimed). This recognizes that even if a policy does have an explicit goal of NNL, this might not be demonstrable in any way.

Regarding the degree of ‘implementation’, we included all offsets that have reportedly been implemented (see ‘data collection’), or at least commenced physical implementation. We excluded any offsets that had been designed but for which delivery has not commenced. For information, a list of projects that we excluded from inclusion in the database on the above grounds is included in the supplementary information (Supplementary Information 2).

Due to international variation in terminology, we also clarify what we consider an ‘offset project’. In some instances, a single restoration project offsets a single development – in others, multiple restoration projects combine to compensate for a single development. Alternatively, ‘habitat banks’ (a collection of previously implemented offset actions from which developers can buy credits) are aggregated offsets, but potentially associated with multiple development projects. For consistency, we considered a single ‘offset project’ to be a contiguous area within which ecological compensation activities are undertaken through NNL-type policy. Consequently, we treated habitat banks as single offset projects. We also note that nature conservation outcomes of biodiversity offsets cannot generally be determined based upon the area they occupy alone, for which one must also consider the condition of the relevant habitat before and after the offset and any associated multipliers [35]. However, we consider data on the number and area of offsets useful proxies for assessing global offset activity, if not outcomes.

Data collection

In order to systematically compile all relevant and available data on offset projects in the process of implementation, we began with the set of policy drivers outlined in the section ‘drivers for biodiversity offsets’. Thus, we implemented the search in turn (a) for each relevant subnational region, each country, each multinational region, (b) each financial lender, and finally (c) each corporation from the sources

384 mentioned. The search encompassed the academic literature, grey literature, project and policy
385 documentation, and any relevant public or private sector online portals. To perform the mapping exercise,
386 we employed both the 'Google' and 'Google Scholar' online search engines with fuzzy search terms. The
387 decision to use fuzzy search terms was taken as a result of considering the known linguistic vagueness
388 often associated with NNL projects [40], and because the research goal was to compile as
389 comprehensive a dataset as possible. The fuzzy search terms "biodiversity offset," "biodiversity
390 compensation," "compensatory mitigation", "no net loss", "net gain" and "net positive impact" were used,
391 in combination with the relevant driver (e.g. "Australia", "Rio Tinto", etc.). That is, we combined each of
392 the 6 fuzzy search terms with: (a) each of the 69 countries; followed by (b) each of the 98 lenders
393 implementing safeguards (n = 6) or belonging to the Equator Group (n = 92); followed by, (c) each of the
394 32 corporations with stated NNL-type commitments. In sum, this meant that 1,194 separate searches
395 were completed using each search engine. Since each individual search consequently returned a very
396 large number of hits, we considered each individual hit in order of return until either (i) no further relevant
397 data were found or (ii) we reached the tenth page of results (whichever came second).

398

399 *Expert chain referral*

400 To complement the data review process above and provide a degree of independent validation [38], and
401 in recognition of the likelihood that many data would evade such a search (see 'data limitations'), we then
402 carried out an entirely separate process of expert chain referral. We contacted a network of established
403 NNL experts, where 'experts' were considered to be those either publishing academic research on offsets
404 in that country in peer-reviewed journals, or those working directly on offset projects (Supplementary
405 Table 1). These individuals were asked to indicate all known data sources on offset implementation for
406 the countries they operated in. Then, we requested that the expert notify us of any other potentially useful
407 individual or institutional contacts. Those further contacts were approached, and so on until we received
408 confirmation that no further data were accessible.

409

410 In a limited number of instances, we were informed that certain raw data on offset implementation were
411 under certain license conditions, and could not be shared. In such cases, we agreed the conditions in

412 exchange for the data so long as the conditions enabled us to publish analyses on the data (if not the
413 data themselves). Findings based on those data are included in the database. Wherever we were
414 informed that additional offsets had been implemented, but either (a) no documentation was available to
415 confirm the fact or (b) analyses based upon the data could not be published, we excluded the data from
416 our database (Supplementary Information 2).

417

418 *Information collated*

419 We collated area occupied, location, and any associated information on offset projects that were
420 documented as having been implemented or were in progress, again ignoring offset projects at the
421 proposal or design stage. Where offset point locations were described qualitatively in a register or
422 displayed visually online, we extracted approximate latitude/longitude coordinates using the 'Google
423 Maps' online mapping software. Doing so introduced some spatial uncertainty to offset locations, which
424 we estimate to be in the region of ± 10 km, and consider acceptable for the purposes of assessing broad
425 global distribution and data transparency. Where point locations were not available, locations were
426 recorded in terms of the number of offsets per region or country. We logged all data sources.

427

428 Finally, we collected information on: (a) management activities associated with implemented offsets
429 ('offset activities'); and, (b) habitats targeted by offsets. The reasons are:

430 (a) a commonly cited concern in the literature relates to offsets compensating losses through the
431 avoidance of anticipated future impacts ('avoided loss' offsets), without resulting in conservation
432 gains against a fixed baseline. This is in contrast with restoration-based offsets (e.g. [41, 42]; and
433 see [43] on counterfactuals). It has also been suggested that avoided loss offsets could pave the
434 way for perverse outcomes such as overestimation of offset gains [26]. In building the dataset, we
435 therefore recorded whether offsets involved 'avoided loss', 'restoration', or alternatives as the
436 primary offset activity;

437 (b) the habitat in which offsets are implemented is crucial. For instance, habitats with longer
438 restoration times create time lags before conservation gains are realized, which is undesirable in

439 seeking>NNL [9]. Further, some habitats are difficult or impossible to restore [41]. Thus, concerns
440 remain that offsetting is inappropriately applied in practice to certain habitats e.g. old-growth [42].
441 We therefore captured information on specific habitat types, subsequently grouping these into key
442 categories (e.g. wetland, grassland).

443 Data were coded directly into a single master database in Excel format (Supplementary Information 1).

444

445 *Uncertainty protocol*

446 The uncertainty protocol proposed and described here applies to overall area occupied by offsets, and
447 was applied to each entry in the database. Offset area is a key metric we report following the compilation
448 of the database on implemented offsets, and the uncertainties in this value are a crucial component of our
449 findings. This protocol follows ISO guidelines on Uncertainty of Measurement [44] and so describes the
450 measurement of the data quality, the sources of uncertainty, and the decision process for determining
451 combined uncertainties. We treat the uncertainty estimate as the range of values within which the true
452 value is likely to lie (i.e. the uncertainty bound is effectively an un-quantified confidence interval). Note,
453 though, that the uncertainty bounds have not been calculated based on inferential statistics – to do so
454 would lend undue credence to the quality and accuracy of the data. Rather, the uncertainty bounds are
455 based upon informed estimates concerning the accuracy of the information contributing towards our
456 database – in turn, creating the need for a transparent and systematic uncertainty protocol.

457

458 A starting assumption we make is that the maximum uncertainty possible in the reported biodiversity
459 offset area for any one country/policy driver is 100% of the value stated – such that the confidence
460 interval runs between coverage factors x0 and x2 of the value stated. We set this maximum value for
461 three reasons. First, it is consequently possible in cases of high uncertainty that the true value for actual
462 implementation is equal to zero, reflecting our aspiration to present a ‘conservative’ estimate of offset
463 activity. Second, in almost all cases additional offsets may have been implemented (‘unknowns
464 unknowns’) and within reason we wished to reflect this in the uncertainty bounds. Third, we took the
465 decision not to speculate, in any case, that the true offset area might be more than double the area for

466 which direct evidence was found. All three reasons are in keeping with our requirement to have
467 'conservative' estimates of total headline figures for offset area.

468
469 Unless specified otherwise, we assume our uncertainty bounds to be symmetrical around the stated
470 value. Since 'area' is not reported for all biodiversity offsets in our database, our figure for total offset area
471 is likely an underestimate. By not incorporating this as a potential bias into our uncertainty estimates (i.e.
472 through the use of asymmetrical uncertainty bounds), we again seek to ensure that our overall estimates
473 are 'conservative' (i.e. if at all inaccurate, then most likely *lower* than the true value). The only cases in
474 which an asymmetrical bound is used are those in which an overwhelmingly large 'interpretative
475 uncertainty' needs to be reported (see 'sources of uncertainty' below), and this is explained on a case-by-
476 case basis. Finally, note that for any country that has a policy that drives biodiversity offsetting, but for
477 which no data were found, we assumed (again 'conservatively') that zero offsets have been implemented
478 in that country. We presume that any offsets that have in reality been implemented in such countries are
479 likely to be insignificant in terms of total offset area globally.

480

481 Data quality

482 We begin with an assessment of data quality, based upon the sources consulted. This assessment was
483 structured around three categories, capturing whether (Y/N) the data could be considered (i) detailed, (ii)
484 complete, and (iii) reliable. For offset data to be considered 'detailed' we required that, as a minimum, for
485 each individual biodiversity offset project, we were able to obtain at least one distinguishing feature (e.g.
486 specific management activity, spatial extent, point location, habitat impacted, etc.). The type of
487 distinguishing feature could vary between datasets (reflecting heterogeneity in disparate global datasets).
488 For offset data to be considered 'complete' we required that, for the policy driver in question, the data
489 were presented as an exhaustive list for the relevant driver. This would include official government offset
490 registers, or data pertaining to one-off projects required by lender safeguards. Finally, for offset data to be
491 considered 'reliable' we required that the documentation containing the data was either: official
492 government documentation; produced as part of a legislative process (e.g. an Environmental Impact
493 Assessment and associated offset strategy); subject to accredited third party verification (e.g. offsets

494 implemented as part of certain development bank finance requirements); or, peer-reviewed academic
495 literature.

496

497 Sources of uncertainty

498 Regan et al. [45] divide uncertainty sources into those that are epistemic ('knowledge of the state of a
499 system') and linguistic ('vagueness, context dependence, ambiguity, indeterminacy of theoretical terms,
500 and under-specificity') categories. Informed by Regan et al., we categorized key sources of uncertainty in
501 relation to the following questions:

502 (Q1) Have we captured all offset projects, and have we captured them in detail [epistemic]?

503 (Q2) Are the offsets we have captured overestimated or falsely claimed [linguistic]?

504 (Q3) Are there different possible interpretations for the area occupied by the offsets we have
505 captured [linguistic]? and,

506 (Q4) How accurate is the numerical information we have on those offsets [epistemic]?

507 These four questions together formed the basis of a decision process (see below, and Fig. M.1) for
508 estimating overall uncertainty in total biodiversity offset area for each policy driver.

509

510 Under question (Q1): we referred to the categorization of offset data as 'detailed' and 'complete' (see
511 section above on data quality). Whenever offset data were not considered 'complete', we assume
512 uncertainty to be very large (i.e. the maximum possible under our protocol). For data that were complete,
513 different pathways were then followed under the protocol if the data were 'detailed' or not, in relation to
514 question (Q2).

515

516 Under question (Q2): bearing in mind whether the data were 'detailed' or not, we then referred to the
517 categorization of the offset data as 'reliable'. If data were not detailed, then it would not be possible to
518 estimate uncertainties under questions (Q3) and (Q4), so we still had to assume large uncertainties. In
519 those cases, reliable data were assumed to be approximately half as uncertain as unreliable data.

520 Conversely, if data were detailed, different pathways were followed under the protocol if the data were
521 'reliable' or not, in relation to question (Q3).

522

523 Under question (Q3): data that were assigned an initial uncertainty depending upon whether they were
524 reliable or not. Then, for each set of offset data in such cases, we considered whether the area occupied
525 by the offset was open to interpretation. Different interpretations would include what to include within the
526 'area' of an offset (e.g. if the offset involved a set of actions on specific land parcels contained within a
527 larger area). We took the highest and lowest possible area according to different interpretations, and
528 treated that interpretative uncertainty (σ_3) as an amount by which to increase initial uncertainty, before
529 moving on to step (4).

530

531 Under question (Q4): finally, in the case of all offset data for which this last question could reasonably be
532 asked (otherwise, the overall uncertainty estimate was considered dominated by sources of uncertainty
533 arising under questions Q1 and Q2), we assumed an additional uncertainty in the evaluation of losses
534 and gains as a result of measurement error. Where estimates of measurement uncertainty exist, we took
535 that value (e.g. this has been explicitly calculated for Australian offsets by [46]) (σ_4) – otherwise, we
536 assume a basic measurement error $\sigma_4 = 10\%$. We incorporate this uncertainty into the uncertainty bound
537 developed under question (3), to give the overall uncertainty estimate.

538

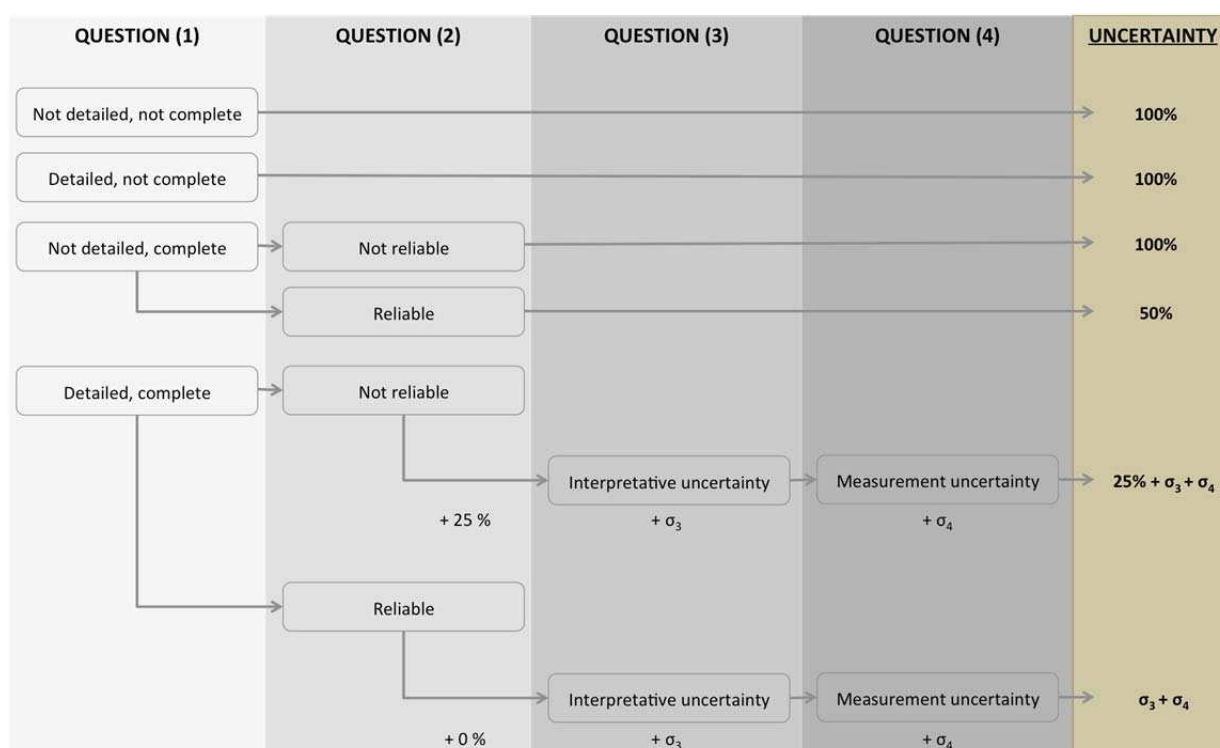
539 Decision process

540 Based upon data quality and the categories of uncertainty discussed above, the decision process for
541 estimating uncertainty bounds by individual dataset (i.e. for each country or policy driver) was therefore
542 as follows (Fig. M.1). Again, uncertainty bounds were calculated as a percentage of the estimated value
543 unless specified otherwise:

- 544 (1) If a specific offset dataset is not complete, assign an uncertainty of 100% (i.e. a coverage factor =
545 2), whether detailed or not. If the dataset is complete, go to (2);
- 546 (2) If the dataset was not detailed and is not reliable, assign an uncertainty of 100%. If the dataset
547 was not detailed and is reliable, assign an uncertainty of 50% (coverage factor = 1.5). If the
548 dataset was detailed, go to (3);
- 549 (3) If the dataset is not reliable, assume that uncertainty is 25% (coverage factor = 1.25) plus the

550 interpretative uncertainty in the data, and go to (4). If the dataset is reliable, assume the
 551 uncertainty is equal to the interpretative uncertainty in the data, and go to (4);
 552 (4) If an estimate of measurement uncertainty is available, use that estimate. Otherwise, assume
 553 measurement uncertainty is 10%. In both cases, add this percentage to the existing uncertainty
 554 bounds taken from (3).

556 **Figure M.1:** decision process for estimating uncertainty bounds. Uncertainty given as a percentage of the
 557 estimated value of total biodiversity offset area for the dataset corresponding to each country/policy driver



558
 559 Uncertainty bounds in the overall areal estimate were calculated by taking the square root of the sum of
 560 squared uncertainty bounds for all constituent entries in the database.

561
 562 **Data availability**

563 All biodiversity offset data have been collated into a single database which accompanies this article. The
 564 database is available from the corresponding author upon request, and will also be included within the
 565 IUCN Global Inventory of Biodiversity Offset Policies (<https://portals.iucn.org/offsetpolicy/>). Specific
 566 sources for each entry, including URLs, are listed in the database.

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665

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667 All correspondence and requests for materials to Joseph W Bull.

668

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674

675 **Author contributions**

676 J.W.B. conceived of the study, developed the methodology, collected and analyzed the data, and wrote

677 the manuscript. N.S. developed the methodology and wrote the manuscript.

678

679 **Competing Interests Statement**

680 The authors declare no competing financial interests.

681 **Figure 1:** Spatial information from the biodiversity offset database. (a) Green shade = ratio of the area
682 occupied by biodiversity offsets in each country to the total area of that country (n=12,983 offset projects,
683 37 countries). Grey shade = countries with relevant policies but where no evidence of offset
684 implementation was found (n=37). (b) All documented biodiversity offset locations (n=3,416, black dots);
685 known associated development projects (n=247, red dots). Inset: brief description of the main driver for
686 those offset projects in selected regions. Created on QGIS Geographic Information System v.2.8.1; base
687 data from Natural Earth v.3.1.0.

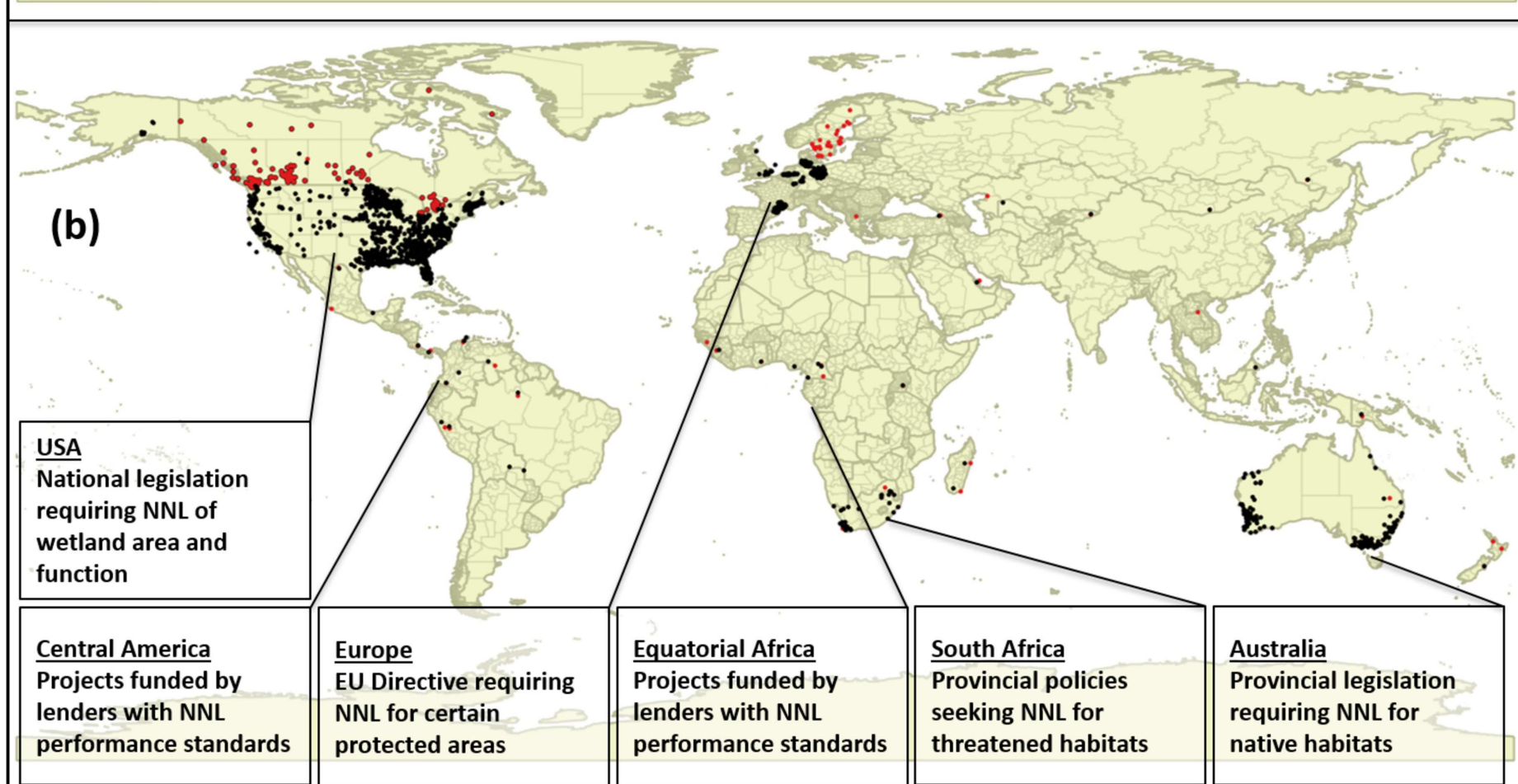
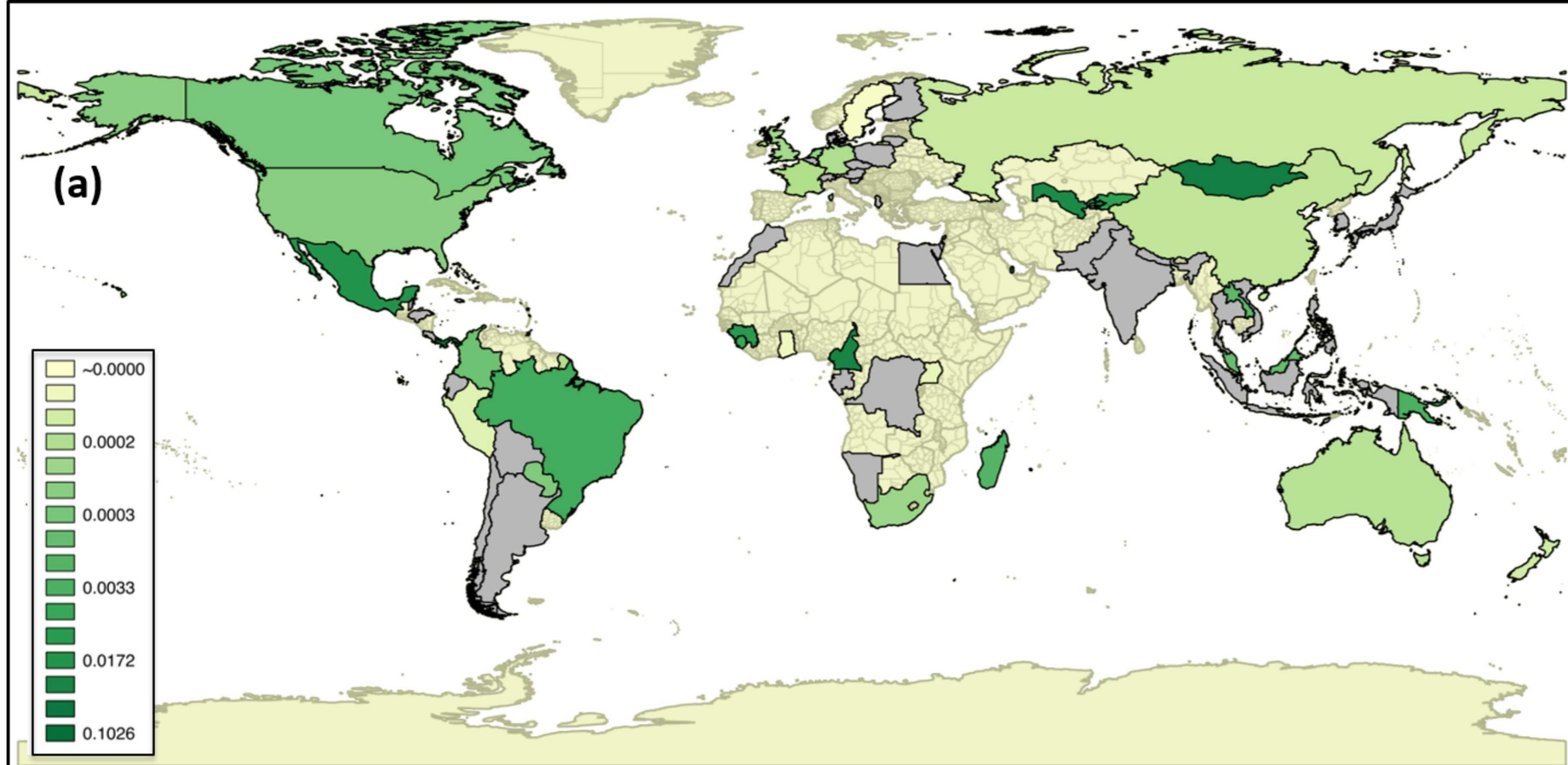
688

689 **Figure 2:** Key characteristics of biodiversity offsets extracted from our database. For all countries with
690 some record of implementation, the number (\log_{10}) and area (km^2) of biodiversity offsets is given.
691 Uncertainty in the value of area occupied was estimated on the basis of our uncertainty protocol (see
692 Methods) and is displayed on the figure. Pie charts show, by country, the main 'Activity' (conservation
693 management activity) and 'Habitat' (habitat type) associated with offsets, for which the proportion is
694 based on the total number of offsets in that country. ND = no data.

695

696 **Figure 3:** (a) Frequency distribution of all biodiversity offsets in the database associated with areal
697 information, by area occupied (km^2). Inset = equivalent frequency distribution for the subset of offsets
698 driven by either project finance requirements or voluntary corporate commitments. The mean area
699 occupied by offsets for projects driven by public policy versus those driven by lender and corporate
700 requirements is substantially different (means = 48.5 km^2 and $3,100.4 \text{ km}^2$ respectively). (b) Fish habitat
701 restoration offset in Canada. (c) Grassland restoration offset in Australia. (d) Mammal conservation
702 ('avoided loss') offset in Uzbekistan (photo credits: J. W. Bull).

Madagascar	9	1,050 ± 521	0	0	100	0	0	100	0	0	0	0
Malaysia	1	340 ± 340	0	0	100	0	0	100	0	0	0	0
Mexico	5,970	33,404 ± 337 / 32,002	0	25	75	0	0	50	0	0	50	0
Mongolia	1	50,000 ± 5,000 / 50,000	0	0	100	0	0	0	0	0	100	0
Netherlands	116	8.5 ± 3.0	0	100	0	0	0	0	0	0	0	100
New Zealand	4	15.3 ± 2.5	50	0	50	0	0	75	0	0	25	0
Panama	1	2,479 ± 1,215	100	0	0	0	0	100	0	0	0	0
Papua New Guinea	1	1,500 ± 150	100	0	0	0	0	0	0	0	100	0
Paraguay	2	115 ± 90	0	50	0	50	0	100	0	0	0	0
Peru	2	50 ± 45	0	100	0	0	0	100	0	0	0	0
Qatar	1	1,189 ± 1,189	100	0	0	0	0	0	0	0	100	0
Russia	1	1,320 ± 132	100	0	0	0	0	0	0	100	0	0
Sierra Leone	2	304 ± 76	0	0	100	0	0	100	0	0	0	0
South Africa	32	294 + 56	69	16	3	6	6	0	0	0	3	97
Spain	200	ND	0	0	0	0	100	0	0	0	0	100
Sweden	44	0.6 ± 0.4	9	66	0	20	5	0	0	0	0	100
Uganda	1	4 ± 0.4	0	0	0	100	0	0	0	0	100	0
UK	11	53 ± 12	0	9	0	0	91	9	0	0	0	91
USA	1,729	2,457 ± 860	0	100	0	0	0	0	0	100	0	0
Uzbekistan	1	7,352 ± 735	0	0	100	0	0	0	0	0	100	0
Venezuela	1	ND	0	0	100	0	0	0	0	0	100	0



Total area of biodiversity offsets (km²)

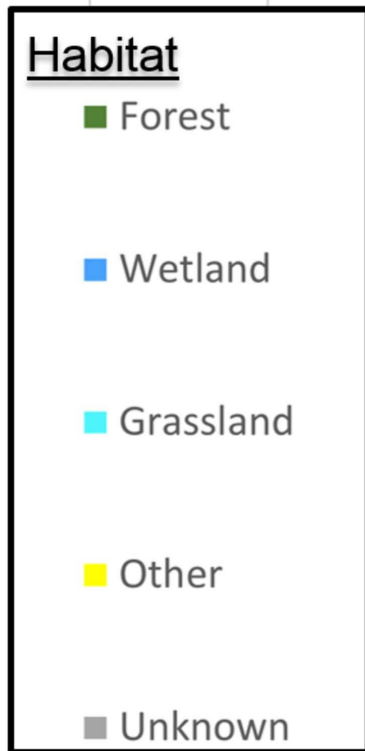
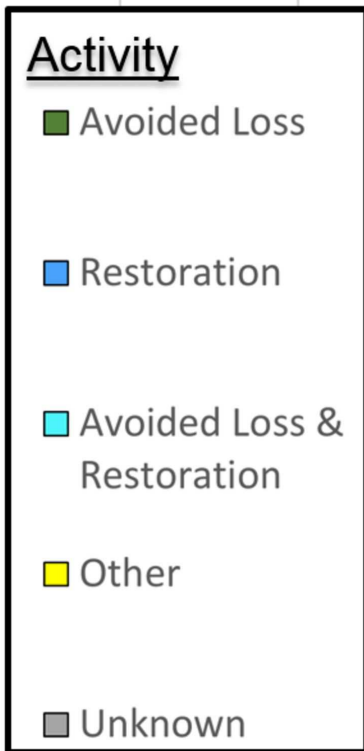
60000 50000 40000 30000 20000 10000 0

Total number of biodiversity offsets (log10)

1 10 100 1000 10000

Activity

Habitat



Australia
Brazil
Cameroon
Canada
China
Colombia
ND Costa Rica
France
Georgia
Germany
Ghana
Guinea
ND Kazakhstan
Kyrgyzstan
Laos
ND Macedonia
Madagascar
Malaysia
Mexico
Mongolia
Netherlands
New Zealand
Panama
Papua New Guinea
Paraguay
Peru
Qatar
Russia
Sierra Leone
South Africa
ND Spain
Sweden
Uganda
UK
USA
Uzbekistan
ND Venezuela

