

# IOGP position on EU Biodiversity Strategy for 2030

## Introduction

**The International Association of Oil & Gas Producers' (IOGP), working closely with IPIECA, shares the global ambition to address biodiversity loss in the framework of the UN Convention on Biological Diversity, the 2030 Agenda of Sustainable Development and supports the objectives of the EU's Biodiversity Strategy for 2030.**

IOGP, through the joint IPIECA-IOGP Biodiversity and Ecosystem Services Working Group (BESWG) has been working for 20 years to continuously improve BES management with the oil and gas industry, recognizing that some industry activities may take place in or near sensitive environments and may affect the natural environment. We support governments and civil society in achieving global and local conservation goals and contributing to enhanced scientific knowledge and science-based policy making. We are ready to continue working with all the relevant stakeholders, sharing our technical knowledge, experience, good practices, and assist in the improvement of the biodiversity regulatory framework.

This paper outlines the IOGP views, including policy recommendations, related to the EU Biodiversity Strategy for 2030 based on IPIECA-IOGP BESWG research, industry engagement and good practice guidance.

## Key IOGP recommendations

- All stakeholders should be considered and consulted through the process of defining new biodiversity conservation frameworks and reporting metrics.
- The private sector plays an important role in the implementation of biodiversity management strategies in Europe and at a global level to achieve a transformative change. The EU should engage the private sector to develop clear mechanisms for businesses to contribute to the Biodiversity Strategy for 2030.
- The new or revised regulatory framework should be informed by ecological science, built on existing EU or international frameworks, and should apply assessment methodologies and conservation practices, that have already proven to be effective in conserving marine and terrestrial biodiversity.
- The legal status, key definitions and objectives should be clearly determined and conservation outcomes should be measurable.
- Oil and gas operations, along with other economic operations, can be compatible with a protection status provided good Biodiversity and Ecosystems Services management practices are implemented in support of conservation objectives.

## Post-2020 global biodiversity framework

The oil and gas industry welcomes international efforts to enhance biodiversity conservation. We acknowledge the UN Convention on Biological Diversity vision of Living in Harmony with Nature by 2050 and the need to conserve sensitive and high biodiversity areas that house the rich natural and cultural heritage of our planet.

The oil and gas industry would like to participate in the development of the overall ecological rationale, conservation criteria, harmonized assessments and science-based management measures. It could provide technical inputs and share its practical experience and technical knowledge on conservation and associated social issues management across a wide range of environments with different degree of ecological sensitivity.

The industry will continue to:

- 1) Support and promote the integration of the Sustainable Development Goals into business processes.
- 2) Develop industry good-practice guidance and tools on the implementation of the post-2020 global biodiversity framework for the oil and gas sector.
- 3) Promote the identification and implementation of nature-based solutions.
- 4) Work in partnership with UNEP-World Conservation Monitoring Centre for further integration of the long-term approach to mainstreaming biodiversity into the sector.
- 5) Promote business alignment of biodiversity management, and contributions from industry to the global biodiversity agenda.
- 6) Encourage use of the mitigation hierarchy to effectively manage all potential impacts on biodiversity resulting from operations along the project lifecycle.

## The EU regulatory framework for conservation of nature and biodiversity

IOGP believes that the EU has put in place a legislative framework which enables the protection and preservation of biodiversity, ecosystem services, species and habitats.

The oil and gas industry welcomes the opportunity to work with the EU institutions to implement and/or update the relevant biodiversity-related regulatory frameworks. IOGP would like to highlight:

- An essential component of the EU Green Deal is to ensure a fair transition, and as such, all existing stakeholders should be taken into consideration when defining new potential conservation measures and/or tools.
- Harmonized implementation and enforcement of the EU legislation throughout all the Member States will provide a stable and transparent regulatory framework for business operations within the different national jurisdictions.
- Any revised regulatory framework should be built on existing European or international frameworks and global international good practices (references in Annex II) to conserve biodiversity and the ecosystem services it provides.
- Any additional protective measures should be commensurate to the impacts and accompanied by environmental net effect and thorough cost-benefit analyses.
- New biodiversity conservation measures should be informed by scale-appropriate ecological assessments to identify marine and terrestrial biodiversity values. The mitigation hierarchy should then be used to characterize measures to limit potential impacts. The authorization of oil and gas activities should be based on the demonstrated ability to manage the potential impacts to the biodiversity values.
- Ecological assessments of conservation status and trends for protected species and habitats need to be supported by appropriate data, standard impact assessments, and relevant information, monitored and updated at regular intervals.
- Positive impacts on biodiversity conservation status through man-made infrastructure should also be considered. The industry is involved in several ongoing work programmes (e.g. the [INSITE Programme](#)) evaluating the benefits to biodiversity of offshore structures. We would be glad to share the results of the INSITE Programme.

## How oil and gas company contribute to conservation efforts

### Val d'Agri, Italy

Val d'Agri is a biodiversity-rich valley part of the Apennine chain in Southern Italy with rural and semi-natural habitats at lower altitudes, and natural and managed woodlands in higher areas. Its value is reflected by the presence of a National Park and Natura 2000 sites.

Beyond compliance, a biodiversity baseline and impact assessment, informed by stakeholder consultations, was performed from 2003 till 2007 in partnership with the local University and International Organizations leaders in biodiversity conservation. The studies detected and quantified the status of key biodiversity features at different scales as well as changes in land use (due to agriculture, grazing practices, urbanisation and oil & gas etc.), demonstrating that the upper valley areas still retain a high biodiversity value.

Since 2008 a targeted Biodiversity and Ecosystem Services Action Plan (BAP) has been implemented, with the aim to effectively restore the localised impacts associated with oil & gas activities, particularly in proximity of two Natura 2000 sites, in montane prairies and in natural forests crossed by the flowline network. On an annual basis, the BAP as well as site operational practices, are updated based on the results of monitoring activities and in line with the evolution of company's Biodiversity and Ecosystem Services Policy and the progress of international good practices. The next update of the BAP will maximise the use of remote sensing technologies for a more accurate and cost-effective monitoring.

## Protected areas

The oil and gas industry supports the goal to legally protect an extended network of areas on land and sea and integrate ecological corridors, to build a coherent, resilient and ecologically representative Trans European Nature Network.

The industry has demonstrated that it can operate responsibly and in a sustainable manner within or in proximity to protected areas or Natura 2000 sites. This is achieved through the implementation of site-specific BES assessments, mitigation measures, and monitoring activities which are developed based on the sensitivities of the area and that support conservation objectives. In some cases, the oil and gas industry has achieved beneficial impacts through biodiversity offsets.

Furthermore, site-level environmental surveys conducted for oil and gas developments all contribute to a better understanding of the natural environment and its sensitivities. Oil and gas surveys have been instrumental in the identification of high biodiversity value areas, which have subsequently been designated as protected areas (e.g. Darwin Mounds in the Rockall Trough, Atlantic Margin).

### Importance of stakeholder consultation

- Based on our experience, we believe that key components to successfully establishing a protected area are to make use of ecological science and existing good conservation practices and the direct engagement of all relevant stakeholders (authorities, local communities, scientists, conservation organizations, NGOs and industry) through all stages of the designation process.
- Given the very ambitious 2030 timeline set by the EU, it is important that the list of potential future designations is made available and that the consultation process starts as early as possible. This is required in order to provide adequate time to develop the necessary mitigation strategies, adjust business plans and allocate budget appropriately.

### Importance of a clear framework

- Clarity as to the legal status and practical implications of designated protected and strictly protected areas is of utmost importance. In particular, conditions which permit activities to be carried out in such areas (e.g. having mitigation measures in place) will have to be precisely listed and based on conservation objectives. Legal status should be designed based on scientific standards and methodologies as developed by scientific institutions. Regional-scale ecological assessments, and scientific standards and methodologies should be used during the determination process.

- Designation should be based on conservation priorities. Oil and gas operations can be compatible with a protection status providing good BES management practices are implemented and do not contradict the conservation objectives.
- Ecological corridors are already taken into consideration as part of environmental impact assessments and the mitigation hierarchy applies to corridors where a potential negative impact is identified. As part of the contemplated Trans-European Nature Network, IOGP would support the scientific delineation of ecological corridors based on ecological criteria, insofar as it would not create additional legal requirements for private actors.
- Appropriate governance should be established for transboundary protected areas to secure consistency.

### Science-based designation criteria

- Several tools for identification and designation of protected areas (land and sea) are available. Engagement of and collaboration between stakeholders, including scientific institutions, industry and NGOs, is essential to select appropriate designation criteria.
- Monitoring activities should be undertaken by Member States to confirm the success of the establishment of the protected areas against set conservation targets, the adequacy of the management plans in place or the necessity to adjust these plans.

## Methods, criteria and standards to measure and report on BES

The Commission plans to develop in 2021 methods, criteria and standards to identify and describe priority biodiversity values, the services they provide and their sustainable use.

The oil and gas sector has been working in partnership with internationally recognised institutions (e.g. UNEP-WCMC, IFC, IUCN, CSBI) to develop assessment methodologies, implementation tools and good practices to integrate BES management into companies' global operations through their own environmental management and company-level reporting systems. Moreover, the industry has produced and refers to many sectoral guidance documents in Annex II.

However, based on industry experience, one of the remaining challenges is the lack of science-based and commonly used metrics suitable for measuring company-level biodiversity impacts, negative or positive. There is also a gap for governments in implementing quantitative accounting criteria for BES and particularly for natural capital as there is no single, agreed-upon accounting process.

In that context, IOGP welcomes the intention to develop and harmonize the methods, criteria and standards at EU level, including new biodiversity reporting criteria, supporting a better corporate governance practices and recommends to:

- develop methods, criteria and standards based on existing sectoral good practices, and aiming at harmonizing the scientific approach to the biodiversity evaluation;
- establish science-based and common metrics and indicators to report on positive and negative impacts of human activities on BES;
- assess existing reporting frameworks on a regional or global level to ensure consistency, quality and relevance, and avoid potential overlaps;
- build the international natural capital accounting initiative on existing initiatives ensuring applicability to oil and gas sector such as Natural Capital Coalition and keeping accounting and reporting tasks under governments' responsibilities

## EU nature restoration plan

The EU Biodiversity Strategy mentions the establishment of legally binding EU nature restoration targets and contemplates the possibility of an EU-wide legally binding methodology and provisions to map, assess and achieve a 'good condition of ecosystems' in view of safeguarding their capacity to deliver services and provide benefits such as climate regulation, water regulation, soil health and pollination.

At this stage, there is insufficient clarity regarding what this would entail for the industry and how the restoration target can be measured and monitored. We believe that nature restoration is essential, and IOGP/IPIECA would support a regulatory framework setting a realistic, science-based objectives that take into account the various existing limitations and are also considerate of different stakeholders.

A precise and clear definition of 'good condition of ecosystems' and how it can be reliably measured is necessary for all stakeholders to understand this objective. Moreover, any measures that are established in order to achieve the objective should be based on peer-reviewed scientific data. However, this has proved to be challenging as in the 'good environmental status' in the Marine Strategic Framework Directive and 'good ecosystem condition' in the Water Framework Directive.

IOGP is looking forward to collaborating with the EU institutions and all the relevant stakeholders, to sharing industry experience and knowledge from restoration projects in order to establish a realistic and achievable restoration target.

## ANNEX I: Oil and gas industry experience with biodiversity and ecosystem services

IOGP and IPIECA develop recommendations and best practices on how to responsibly integrate the management of BES across the lifecycle of oil and gas operations and embed the concept of BES management within operational practices and management systems. Based on the collective, hands-on knowledge of its members and through partnership with research institutes and international organizations, IOGP-IPIECA develop good practice guidance, implementation tools and frameworks, supporting the oil and gas industry to manage BES issues in their European and global operations in a sustainable and responsible manner.

We are aware of the positive role business can play in finding solutions to the challenges of biodiversity loss. For this reason, IOGP-IPIECA recommends the following good BES management practices applicable for the oil and gas industry in any type of operation and in any type of natural environment:

- Building BES management into governance and business processes.
- Engaging stakeholders and understand their expectations around BES.
- Understanding BES baselines and dependencies.
- Assessing BES potential impacts.
- Mitigating and managing BES impacts, and identify and implement BES opportunities.
- Selecting, measuring and reporting BES performance indicators.

The oil and gas industry participates in several sectoral and cross-sector initiatives on biodiversity, including but not limited to:

- the Cross-Sector Biodiversity Initiative (CSBI) formed by IPIECA, the International Council on Mining and Metals (ICMM) and the Equator Principles Association in 2013;
- Business for Biodiversity Platform.

We also engage and work closely with other key biodiversity stakeholders as the United Nations Convention on Biological Diversity, Biodiversity Beyond National Jurisdiction, World Conservation Monitoring Centre, Oceans Conference, and International Union for Conservation of Nature (IUCN).

To demonstrate in more detail the engagement of the oil and gas industry in relation to biodiversity, we provide the below examples and case studies:

- Some examples of existing oil and gas or cross-sectoral guidance/best practices/indicators on biodiversity in Annex II.
- Examples of existing oil and gas collaborations with the scientific community to collect data and support research projects in Annex III.

## ANNEX II: Some oil and gas or cross-sectoral guidance/best practices/indicators on biodiversity

- **IPIECA**
  - Biodiversity and ecosystem services fundamentals: the BES Fundamentals guidance document which brings together information essential to informing BES strategy development and decision making at the corporate level and at the key stages of an asset life cycle for any type of operation or environmental context.
  - Sustainability reporting guidance: the Sustainability reporting guidance for the oil and gas industry is a key tool to help companies shape the structure and content of their sustainability reporting, published in conjunction with the American Petroleum Institute (API) and the International Association of Oil & Gas Producers (IOGP).
- **Guidelines and documents developed by the Energy and Biodiversity Initiative (EBI), 2001-2003:** the first example of cooperation between the energy industry and leading scientific conservation NGOs on an international scale.
- **Guidelines and documents developed by the Biodiversity and Ecosystem Services Working Group of the IPIECA and IOGP associations:** provides leadership, guidance and tools to manage BES issues that are based on the collective knowledge of its members and are produced in conjunction with stakeholders relevant to the oil and gas sector.
- **Integrated Biodiversity Assessment Tool (IBAT):** developed by UNEP-WCMC in conjunction with IUCN, Conservation International and BirdLife, it is an online accessible GIS tool that facilitates access to accurate and up-to-date information on biodiversity on a global scale to support private sector strategic and project decisions.
- **International Finance Corporation Performance Standard 6 (IFC PS 6):** provides a methodology and specific criteria for identifying, natural or critical habitats within the area impacted by a site and its associated infrastructure, and sets performance expectations for mitigation of impacts to biodiversity.
- **Business and Biodiversity Offsets Programme (BBOP):** since its inception in 2004, the BBOP has grown to become a partnership of some 80 leading organizations and individuals including biodiversity footprint companies, environmental consultancies and other service providers, governments, conservation organizations and financial institutions from around the world.
- **Cross-Sector Biodiversity Initiative (CSBI):** a partnership between IPIECA, the International Council on Mining and Metals (ICMM) and the banks of the Equator Principles Association, it develops and shares good practices related to the protection of biodiversity and ecosystem services in the mining sector, supporting the application of the mitigation hierarchy.
  - CSBI-Mitigation-Hierarchy-Guide (CSBI, 2015): offers practical measures for predicting and verifying biodiversity conservation outcomes over time; and offers insight into documenting and comparing costs and savings resulting from mitigation action or inaction.

## ANNEX III: Collaboration of industry and science

These examples highlight collaboration between industry and science to collect data and scientific research projects.

- [ATLAS project](#) – consists of 12 universities, 5 small and medium-sized enterprises (SMEs), 3 government agencies and 4 national research centres and focuses on the trans-Atlantic assessment and deepwater ecosystem based spatial management plan.
- [E&P Sound and Marine Life Joint Industry Programme](#) – aims to increase understanding of how the sounds generated by oil and gas exploration and production activity – especially by seismic surveys – can affect marine life.
- [Environmental Genomics Joint Industry Programme](#) – set up to coordinate research aimed at exploring the application of eDNA-based analyses in environmental assessments and monitoring of oil and gas offshore and onshore operations.
- [iAtlantic project](#) – consists of 33 scientific partners and 11 international associate partners aiming to deliver integrated assessment of Atlantic marine ecosystems in space and time.
- [INSITE Programme](#) - conceived in 2012 to produce independent science leading to a greater understanding of the influence of man-made structures on the North Sea ecosystem.
- [Proteus Partnership](#) - forum of the most forward thinking companies across key sectors who partner with UNEP's specialist biodiversity assessment arm: UNEP-WCMC aiming to support biodiversity data and information development.

## About IOGP/IPIECA

**IOGP** represents the upstream oil and gas industry before international organizations including the International Maritime Organization, the United Nations Environment Programme (UNEP) Regional Seas Conventions and other groups under the UN umbrella. At the regional level, IOGP is the industry representative to the European Commission and Parliament and the OSPAR Commission for the North East Atlantic. Equally important is IOGP's role in promulgating best practices, particularly in the areas of health, safety, the environment and social responsibility.

**IPIECA** is the global oil and gas industry association for advancing environmental and social performance. IPIECA convenes a large portion of the oil and gas industry across the value chain, bringing together the expertise of oil and gas companies and associations to develop, share and promote good practice and knowledge. IPIECA is the industry's principal channel of engagement with the United Nations. Its unique position enables its members to support the energy transition and contribute to sustainable development.

---

**Registered Office:** City Tower, Level 14, 40 Basinghall Street, London EC2V 5DE, United Kingdom  
T +44 (0)20 3763 9700 / [reception@iogp.org](mailto:reception@iogp.org)

**Brussels Office:** Avenue de Tervuren 188A, B-1150 Brussels, Belgium  
T +32 (0)2 790 7762 / [eu-reception@iogp.org](mailto:eu-reception@iogp.org)

**Houston Office:** 15377 Memorial Drive, Suite 250, Houston, TX 77079, USA  
T +1 (713) 261 0411 / [reception@iogp.org](mailto:reception@iogp.org)

[www.iogp.org](http://www.iogp.org)  
[www.oilandgaseurope.org](http://www.oilandgaseurope.org)