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<b>Auditability</b>	
<b>Changes to Means of Verification</b>	
<b>Barriers to certification?</b>	
<b>Duplication / Overlap</b>	
<b>Other issues</b>	<p>What if biodiversity assessment is historical (e.g., conducted before certain concepts and methodologies for things like offsets well developed)?</p> <p>3.8.1.2. Grammatical error: "3.8.1.2. The assessment shall include consultation with stakeholders shall include explicit identification and consideration of:" Missing 'that' before second "shall" perhaps?</p> <p>3.8.1.2.e. Should BBOP be referenced as an example of an offset methodology? [Guidance]</p> <p>3.8.2.1.b Suggested addition: add indicators, budget, resources and responsibility to the list of what the management plan should include.</p> <p>3.8.2.1.e. Need guidance on tools for measuring/quantifying loss/gain.</p> <p>3.8.2.2. "Biodiversity management planning shall be carried out and documented by competent professionals using best practice procedures to . ." Should 'best' be 'good' (i.e. good practice procedures)?</p> <p>3.8.2.2.a. "Identify key biodiversity indicators sufficient to monitor the impact of the operating company's activities over time, and to demonstrate that the overall net impact is neutral or positive;" - this implies that the methodology to measure and demonstrate that the overall net impact is neutral or positive is already in place (so that comment should be added somewhere - the methodology needs to be designed before or at least in parallel with the selection of indicators).</p> <p>3.8.3.1. Give examples of acceptable methodologies for demonstrating net neutral or positive impact. Could this be adapted to qualitative assessment initially and then semi-quantitative (to enable smaller companies to have a better chance of complying and working towards a fully quantified demonstration)?</p> <p>3.8.4. Note that the allocation of resources should be relative to the timeframe in which biodiversity loss and restoration will occur.</p>