

Article

Biodiversity Offsetting: Ethical Views within Environmental Organisations in the European Union

Mikael Karlsson 

Department of Earth Sciences, Uppsala University, 75236 Uppsala, Sweden; mikael.karlsson@geo.uu.se

Abstract: Biodiversity offsetting is a nature conservation instrument that is increasingly used but also strongly criticised. Previous studies have identified the ethical underpinnings of this criticism, but if and how ethically-based objections exist among persons active in nongovernmental environmental organisations is not clear. This study, therefore, explores occurring ethical views through seven in-depth interviews within this group of stakeholders. Among the results, the respondents in general took a consequential ethical view, according to which both benefits and costs with biodiversity offsetting should be considered and balanced, resting on a strong biocentric or ecocentric base, albeit within an ethical frame of restrictions for when to not use the instrument, indicating a strong deontological ethical basis. Overall, the respondents did not consider that the existence of intrinsic nature values, which they recognised, nor the potential commodification of such values, constituted definite barriers to biodiversity offsetting. Moreover, they did not see that offsetting, per se, would lead to non-virtuous attitudes towards nature. On social justice issues, the views diverged significantly. However, all respondents underlined a strong need for improved governance, including to prevent biodiversity offsetting of high nature values, to restrict flexibilities, and to apply multipliers with sufficient margins.

Keywords: anthropocentrism; biocentrism; commodification of nature; ecocentrism; ecological compensation; environmental organisations; European Union; intrinsic value; nature conservation; social justice



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1. Introduction

Biodiversity offsetting is a nature conservation instrument that is increasingly used around the world, including in the European Union (EU) [1–5]. It aims to counterbalance environmental damage caused by development and exploitation projects by generating compensatory gains amounting to, at least, no net loss of biodiversity [6]. If applied in line with the so-called mitigation hierarchy—that is, after taking measures for avoiding, minimising, and restoring damage [7]—offsetting is commonly considered an important instrument in the biodiversity governance toolbox [8–10]. It is, for example, an integral part of the EU habitat directive, is promoted by the European Commission, and is applied in national laws and policies in several EU Member States [4,11,12]. At the same time, biodiversity offsetting in general as well as many specific offset projects are questioned on various grounds [13–24], and a debate on the issue has been ongoing for several years [4,23,25–28]. Some environmental organisations are more or less opposed to the use of the instrument [29–31] while others are accepting of it [32]. The criticism expressed by researchers and environmentalists is broad and focuses on, for example, scientific uncertainty, methodological shortcomings, policy challenges, and implementation deficits, but a closer analysis implies that the underlying motive for the criticism is often normative [33,34].

In order to structure and explore the normative basis for the criticism, a comprehensive analysis of the scientific literature on biodiversity offsetting was recently undertaken, which identified five categories of common ethical objections to using the instrument [33]. The present study departs from these objection categories and aims to explore whether, and if so

how, they are expressed by persons holding central positions within nongovernmental environmental organisations in the EU. In the EU policy context, these organisations often play a central role in nature and biodiversity policy development and implementation [35,36]. However, the views on biodiversity offsetting within the environmental movement have not been studied in much detail. While the different official positions on biodiversity offsetting policy and projects stated by environmental organisations are often evident, the underlying ethical views are far from clarified, despite their importance for how positions are formulated and how public policies and their development are considered. This study, therefore, investigates the following three specific research questions, mainly through a series of in-depth interviews: (i) Are ethical objections to biodiversity offsetting expressed by individuals in central positions within EU nongovernmental environmental organisations? (ii) If so, how can stated ethical views and arguments be characterised by ethical concepts and paradigms? (iii) Which proposals, if any, on policy and legislation are advocated as being key to cope with the concerns raised?

Although this qualitative study evidently does not explore ethical views within larger groups of people in the environmental movement, it still presents common views and, in contrast to what a questionnaire with a broad coverage would result in, it offers insights into ethical views and underlying reasoning. A deep understanding of the views on ethics expressed by these key respondents enables an enriched discussion on how biodiversity offsetting policy potentially could be developed in order to build broader support and, ultimately, promote better protection of the nature values considered to be at stake. In the following, an analytical frame based on the previously identified ethical objections [33] is described, followed by a section on materials and methods. The section thereafter presents and analyses the results, as a basis for a final section containing a discussion with policy recommendations.

2. Ethical Analytical Frame

The analysis of ethical views in this article is based on the findings in a recent systematic study of ethically-based criticism of biodiversity offsetting [33]. The study characterises normative arguments identified in the scientific literature with the help of two pairs of concepts and three paradigms that are central in environmental ethics [37]. The first pair of concepts is “intrinsic value” and “instrumental value”, which denotes different views about the type of value that, for example, a human or a nonhuman organism, species, or biotope can have. An entity that is valuable in itself has an intrinsic value, whereas an entity valuable only as a mean to other ends has an instrumental value. The second pair is “anthropocentrism” and “non-anthropocentrism”. The former anthropocentric view implies that only humans and various forms of human fulfilment have intrinsic value, whereas the latter non-anthropocentric view extends such values to at least some other parts of nonhuman nature, for example other types of organisms (termed “biocentrism”) or various habitats and ecosystems (termed “ecocentrism”). The three basic ethical paradigms state what is right and wrong to do, either to adhere to certain definite rules or respect stringent limits for what is a permissible act (called “deontological ethics”), to opt for a specific alternative based on the results of an act or a decision, often by aiming for maximising benefits over costs (called “consequential ethics”), or to strive to uphold certain moral characters and habits (called “virtue ethics”). These three paradigms can metaphorically be illustrated with a fence, a scale, and a compass respectively [38]. The discipline of environmental ethics has contributed a vast number of studies to the literature that further describe and elaborate on these concepts and paradigms [37,39–41].

The first of the five identified ethical objections to biodiversity offsetting states that offsetting violates nature’s intrinsic value and, therefore, is wrong in itself, irrespective of any positive consequences that may follow. Protecting nature with only instrumental intentions and through a sort of “commodification” [13]—where more or less a price tag is put on nature values—is simply wrong according to this deontological non-anthropocentric view. The second objection has an ontological base and maintains, in different versions,

that loss of nature value can never be fully compensated by humans and offsetting projects, which, therefore, are ethically wrong from a deontological non-anthropocentric view. True fungibility does not exist due to the unique characteristics of specific nature values. The third objection is epistemologically-based and claims—from a deontological or consequential non-anthropocentric view—that offsetting is wrong since humans know too little about nature, at least today, even though some consider this to always be the case. The high complexity of nature prevents full compensation. The fourth objection asserts, resting on a virtue ethical view, that offsetting impedes different types of virtuous dispositions towards nature. Attitudes and characters may easily be corrupted due to offsetting projects, which, therefore, are wrong to carry out. Finally, the fifth objection is anthropocentric and focuses on the social justice implications, stating that inequalities may be worsened due to offsetting. Fair compensation between winners and losers may be impossible to achieve, making offsetting ethically wrong, according to either a deontological or a consequential ethical view.

As described, these five objections most commonly depart from a deontological ethical paradigm, recognising non-anthropogenic intrinsic values in nature, although consequential ethics and an anthropocentric basis also underpin some of the criticism. Offsetting under a contextually high complexity of nature, as well as when potential offsetting benefits are diluted temporally or spatially, is generally associated with stronger criticism. However, the debate and the literature are also rich in ethical counterarguments. Central among these is that biodiversity offsetting may, after all, in cases of on-going human exploitation of nature, be an important and perhaps even necessary nature conservation instrument, in particular when intrinsic nature values otherwise would be threatened even more. Full compensation is moreover seldom the assumed aim and outcome of biodiversity offsetting in practice, rendering criticism on that point redundant. Furthermore, in many instances, knowledge is high and complexity is comparatively low, allowing effectual offsetting. This may in particular be the case if the mitigation hierarchy is implemented and so-called multipliers (that is, factors that increase, for example, the size of an offset area [6]) are used. Regulation can additionally point out so-called “no go areas” [42], for which offsetting may never be used, and offsetting flexibilities can be restricted in type, space, and time. Given these counterarguments, proponents and opponents of biodiversity offsetting might, after all, be able to agree on the use of the instrument, provided that certain policies and laws are developed and implemented [32]. The present study expands the exploration of ethical views on biodiversity offsetting to a central group of stakeholders in nature conservation policy, from which both critical and supportive voices have been heard, namely nongovernmental environmental organisations, with a focus on the European Union. In the subsequent examination of ethical views and other opinions stated by individual respondents during in-depth interviews, the ethical concepts, paradigms and objections described above will serve as an analytical frame.

3. Materials and Methods

In order to explore the views held by the stakeholders, a series of semi-structured interviews [43] were conducted. These interviews provide the most important empirical material in relation to the aim of the study. In all, seven persons active in nongovernmental environmental organisations in the European Union were interviewed in-depth in November 2019. The interviews were held in English, lasted up to one hour, and followed a template with topics and open-ended questions based on the ethical analytical frame described above. Before each interview, each respondent was informed about the objectives and set-up of the study, how the information retrieved was to be used, that anonymity was ensured, and that participation and the answering of questions was voluntary and could be stopped at any time, including that the participant could fully withdraw from participating entirely. They were, moreover, encouraged to answer based on their personal views, and not as formal representatives for their organisations, but also to clarify, when possible, if their understanding differed in any significant way from the corresponding organisational

position, something that occurred in some cases. The interviews were recorded and notes were taken in parallel.

The respondents were selected in order to obtain a broad coverage of potential views within the environmental movement in the European Union. Each interviewed person held a central and formal position, for at least a few years and, in a few cases, up to several decades, in at least one nongovernmental environmental organisation in the European Union. These organisations were most commonly member-based and had broad agendas spanning from nature conservation to environmental policy. Each respondent was working on both a national and European level, and some were involved in activities also on the global level. Most respondents had primarily been based in one country, but a few had a multi-country professional background. All the countries in which the respondents operated on daily basis were members of the European Union, and included both older and newer, as well as larger and smaller, Member States from north to south and west to east. All respondents were, moreover, actively involved in on-going collaboration with persons from environmental organisations in other European countries, including on topics of relevance for the questions being formulated in the present study. Each respondent had at least an academic bachelor's degree, varying from biology and engineering to law. Further information about the individual respondents is not given, due to the ensured anonymity, which was also explicitly asked for in some cases, and which was considered instrumental for the study, since it was important to, as far as possible, allow respondents to speak freely on potentially sensitive issues, being confident that their names would not be disclosed. This limitation in transparency is considered to not impede the study or the writing of this article in any significant way.

Besides the interviews, desk research was also conducted, including studies of the scientific literature in the field (a search of the literature was carried out on "biodiversity offsetting" in combination with the keywords stated for this article), and of policy positions among, for example, nongovernmental environmental organisations in the European Union.

4. Results

In the following, the results of the interviews are presented and analysed under four headings, largely based on the ethical analytical frames described above. Illustrative quotations from the interviews are included continuously in the presentation.

4.1. *The View on Biodiversity Offsetting in General*

The general view on biodiversity offsetting as a nature conservation instrument varied among the respondents, from more critical to more positive. However, a couple of respondents emphasized that it is important to distinguish between biodiversity offsetting for damage that exceptionally is permitted under the EU Bird or Habitats Directive, for which the adequate term was claimed to be "ecological compensation", and biodiversity offsetting in other contexts, for which "biodiversity offsetting" was considered the proper term. Despite the varied opinions, none of those taking a critical stance rejected the use of offsetting altogether, while none of those being comparatively positive expressed an unconditionally accepting view.

Several respondents stated that they saw the offsetting concept as "tricky" to understand and "risky" to use, but most stated that biodiversity offsetting can function as a more or less valuable nature conservation instrument, but only in particular cases and under specific conditions, "as a last resort" according to one respondent. There are "lots of ifs and buts", another respondent said, but "if you destroy something [then you must] compensate, you try fix it". In doing so, the mitigation hierarchy was emphasized as important by most respondents. On top of that, all respondents saw a need for restrictions of one kind or another for when and how the instrument should be permitted to be used. It should, for example, be used only when knowledge is sufficient, if certain "conservation criteria" are met, and "for common [i.e., ordinary and low value] nature" in order to achieve "net

gains”, and not for “very valuable nature” or at “the global level”, according to various respondents. One respondent added that all organisms, including microorganisms, should be considered in practice, otherwise implementing offsetting “is greenwashing”.

Against this background, the largest common general denominator among the respondents can plausibly be summarised as “use biodiversity offsetting only as a last resort and essentially only in those contexts in which knowledge is sufficient for achieving sufficiently adequate compensation, and only when high nature values are not threatened”. Linked to such a desired practice, the respondents described and exemplified in more detail the various challenges they saw, such as limited knowledge on complex, and in particular old and undisturbed, ecosystems and their functions, especially with regard to effects of human interventions over longer time frames and geographical distances. Full compensation was considered by most respondents as impossible to always achieve, exemplified with old-growth forests and the uniqueness of place-based soil microfauna, but a few actually saw it as feasible in specific instances, such as when some types of wetlands are restored, albeit being very difficult.

In summary, from an ethical point of view, the respondents in general expressed a consequentialist view, according to which both benefits and costs with biodiversity offsetting should be considered and somehow weighed, resting on a strong biocentric or ecocentric base. In most cases, however, the balancing of benefits and costs when using the instrument was required to be carried out within a frame of restrictions assumed to demarcate when biodiversity offsetting should be impermissible, thus, expressing a basically deontological ethical approach. Nevertheless, the consideration of consequences implies more of a pragmatic approach among the respondents in the present study than what some environmental organisations have argued in public debate and compared with what has been expressed in the scientific literature that articulate ethically-based criticism of biodiversity offsetting [33].

4.2. *Intrinsic Nature Values and Commodification*

A central question in environmental ethics concerns whether a specific organism, a species or another kind of biological unit, such as a habitat or even a landscape, is considered to have only an instrumental value for humans, for example as food or fibre, or also an intrinsic value, meaning a value in itself, that is independent of potential benefits for humans, implying a biocentric or ecocentric view. The referred study on ethics and biodiversity offsetting [33] showed that the perceived violation of such intrinsic values in nature was a central aspect of much of the criticism of offsetting expressed in scientific journals. When the respondents in the present study elaborated on the matter, a few acknowledged the existence of intrinsic nature values and, thus, expressed a non-anthropocentric view, but most were silent or rather vague on the topic, even though no one formulated a purely instrumental view of nature. Nevertheless, none of the respondents explicitly expressed that offsetting as such entails an absolute violation of intrinsic nature values. Several stated that humans have always affected nature—“most of what most people think is nature is created by us”—and that “nature changes constantly, it’s a dynamic system”, so biodiversity offsetting was rather considered to be a potentially less violating human undertaking than nature exploitation without offsetting. According to some respondents it can even positively affect nature’s dynamic and strengthen nature values, whether they are intrinsic or not.

Similarly, whereas commodification of nature values was criticised by most respondents—“to reduce nature down to a number on a spreadsheet”, as one of them said—this view was not motivated in terms of being a violation of intrinsic nature values, per se. The criticism was based primarily on different types of alleged practical nature conservation challenges and, in particular, due to assumed negative environmental consequences of commodification, implying that “no net loss” (or “net gains”) would not be achieved in reality by carrying out biodiversity offsetting projects. Several considered this to result from scientific uncertainty or low valuation of nature entities which, when translated

into monetary values, commonly weigh less on a market than the expected gains from exploitation. As stated by one respondent, in a “corporate calculation about whether [nature] can be destroyed compared to how much profit you’re gonna make . . . in most cases, nature is gonna lose in that argument”. Commodification was, therefore, seen to risk legitimising nature exploitation.

In summary, most respondents did not regard offsetting as violating intrinsic nature values, *per se*, and, thus, articulated a predominately consequentialist, but still non-anthropogenic, view. This differs from the deontological ethical view that is commonly expressed in the scientific literature [33], with critical scholars often arguing that biodiversity offsetting is wrong since it, *per se*, violates intrinsic nature values.

4.3. Fungibility, Knowledge and Control

Regarding the possibility, in an ontological sense, for humans to compensate for nature losses by developing or recreating nature through biodiversity offsetting, many critical researchers have expressed the view that full compensation of nature values was seldom or not at all possible since full fungibility is hardly achievable [33]. The respondents in the present study rather shared a nuanced view on this point, namely that while some habitat types indeed can be produced, other types are difficult or impossible to create, “and understanding the difference is perhaps the biggest challenge”, as one respondent put it.

The former group of potentially fungible habitats include biodiversity rich environments co-formed by humans in the first place, such as certain wooded pastures, where resumed grazing and extensive cultivation could benefit biodiversity in, for example, overgrown areas, as well as environments that are already severely affected by humans, such as drained wetlands, which can be rewetted or protected, but also some types of production forests. For environments of such kind, restoration of biodiversity—or “rewilding gains”, as one respondent said—can be achieved, but some respondents carefully pointed out that, for example, peat bogs might still take several centuries or more to be fully restored. Some of the respondents also stated that humans cannot provide “naturalness” or nature, but can instead “create space for nature to flourish”, for example by “undoing the damage we’ve done to date”, and that “by restoration, we can help nature to take back control of the spatial area”.

In the latter group of habitats, certain types of more complex environments were considered impossible to create, with “old-growth forests” being the most commonly referred example, where exploitation inevitably would cause disruption of unique ecological processes and continuities, rendering fungibility impossible. Similarly, “the irreversibility of extinction” of species was also highlighted as a fact setting a definite ethical barrier to biodiversity offsetting. Furthermore, these offsetting problems were seen to become common if “we”, as one respondent argued, “understand biodiversity really as it is scientifically, and not as it is commonly in the media, [i.e., including] all the micro fauna of the soil”, for which biodiversity offsetting “is totally different” than creating “an artificial nest for a stork” or taking measures for other “emblematic species”. The soil in one specific area can never be fully compensated with soil elsewhere. Since nature constantly evolves and changes, and since humans inevitably affect nature everywhere, the delicate question was also formulated by one respondent as to “which nature” should actually be compensated.

When elaborating on the topic of fungibility, however, most respondents were quite vague on the ontological dimension and rather reasoned in epistemological terms, with a focus on the complexity of nature on the one hand and on the corresponding limited human knowledge, “the relatively young [ecosystem restoration] science”, on the other. All respondents underlined this knowledge challenge and considered it a major obstacle to biodiversity offsetting, in particular regarding effects over longer time periods. Indeed, “the complexity of nature that develops in these kinds of long-term structures is beyond our understanding today”, as one respondent stated. However, none of the respondents claimed that it would be ethically wrong, *per se*, due to scientific uncertainty, to allow offsetting as such. Several instead took a position that uncertainty is something that will

always prevail, due to practical and human cognitive limitations, but also since many natural processes and habitats are constantly changing and, therefore, are impossible to fully monitor, assess, and comprehend. The main challenges expressed in this context concerned the design of policy instruments, the level of implementation of these, and the degree of control over longer periods. The following was stated: “There is no way any government can guarantee the preservation of a forest for centuries”. The epistemological challenge is, thus, practical rather than ethical.

In summary, the respondents appreciated that there are specific instances when offsetting is ethically feasible or even desirable, since substantial, albeit not necessarily full, ecological compensation was seen as possible to achieve, resulting in less overall damage of biodiversity and, in the best case, even in net benefits. This consequential ethical view is comparatively positive to biodiversity offsetting, and ethical concerns rather speak for than against offsetting, provided that it is restricted to cases when high nature values are not threatened.

4.4. Attitudes and Social Aspects

The aforementioned analysis of scientific studies expressing ethical objections to offsetting [33] shows a broadly shared concern that virtuous attitudes and decent relationships with nature could be negatively affected by offsetting, since it risks triggering a more instrumental view of nature, as a commodity among others. The respondents in the present study, though, did not express particularly strong virtue ethical views on this point. Some instead emphasized that present attitudes and perceptions of nature are often indifferent or anything but virtuous, as “We [don’t] have a very healthy understanding of the relationship with nature anyway”, and “the public in general . . . probably don’t think about these things . . . or they don’t care about it at all”, so offsetting is, therefore, not “going to make [the situation] worse”. The “price tag” stemming from offsetting might, according to some respondents, actually have a positive impact among, for example, corporate actors, who otherwise might be inconsiderate. A few stated, though, that far-reaching commodification and monetization can affect attitudes in a negative way, but that a far greater problem is whether monetization results in substandard offsetting in practice, from a nature conservation point of view.

On most of the topics explored so far, the respondents had relatively similar and often overlapping views, but with regards to biodiversity offsetting and social justice, two quite different sets of views could be identified. Some respondents evidently considered the social dimension as subordinate to the environmental, being “less bothered about the human impact than about the impact on the species and the habitats”; the “environment is the key thing . . . ” and “if you try to consider everything then [offsetting will also] be a really impossible task”, so a system should be based on “ecological knowledge” and concerns. Others, on the contrary, saw social aspects as central and something that should be given more and stronger attention, as “this is a totally different story [but social aspects] are equally important”. While all respondents agreed that social injustices can indeed arise, and that stakeholder views are important, some of those who regarded the social dimension as less important took the view that what is considered socially just can be counterproductive for achieving conservation goals. A non-anthropocentric deontological ethical view was, therefore, put forward, rather than an anthropocentric consequential view. Others in this group argued that social aspects should be considered, and could be compatible with environmental objectives, but that the former dimension does not require specific decision-making processes. However, the respondents who, on this anthropocentric consequential basis, emphasized the importance of the social dimension, still saw it as important to highlight and consider social justice, for example by sometimes not allowing offsetting to be diluted in time and space. In summary, the topic of social justice was the one that was characterized by the greatest differences of ethical views among the respondents.

5. Discussion

This qualitative study focuses on how a set of persons that are active in nongovernmental environmental organisations in the European Union reason and argue about ethics and biodiversity offsetting. The picture that emerges is, of course, not necessarily representative for the views in the environmental community at large, in which the ethically-based understanding of offsetting probably spans from very positive to very negative, on both individual and organisational levels, with variations from one country to another. However, since the respondents have a long background and central positions in the environmental movement, the answers may very well indicate quite common perceptions and ethical views. Some of the respondents have in fact also been involved in formulating the views on biodiversity offsetting for larger environmental organisations, and others have pursued legal cases on nature conservation issues, thus, taken together, the group of respondents represents solid knowledge and long experience in the field. During the interviews, all respondents also referred, to varying degrees and in different aspects, to discussions on biodiversity offsetting that had been held within their respective organisation, as well as in broader networks and contexts in which they had operated. Several highlighted how they themselves regarded the ethical issues raised in the interviews in relation to the understanding among other environmentalists. Although the respondents were asked to answer the questions based on their own views, which all of them varyingly emphasized that they did, it is not unlikely that their views are common in the environmental movement in the European Union.

Compared to the image that is commonly given both in the debate and in the literature [33,44,45], namely that environmental organizations are largely critical to biodiversity offsetting in general and commodification of nature values in particular, the respondents were comparatively positive when it came to actually using the instrument. The general ethical view can be summarized as a non-anthropocentric consequentialism, coupled with a criticism primarily focused on the challenges to achieve in practice what biodiversity offsetting is aiming for in theory and policy [6,11,12,46]. As long as that purpose is likely to be fulfilled, the basic view was generally positive, albeit in some cases due to the absence of other conservation instruments, such as strict protection of larger areas of threatened habitats, and provided effectual governance systems are put in place, ensuring that high nature values are not threatened. The latter is in line with recommendations from the International Union for Conservation of Nature, for example, that offsetting must not be used if a species being red-listed as threatened would be worse off, or if impact would occur in recognised “no go areas”, such as national parks [42]. None of the respondents fully rejected using the instrument, though, and none considered that using it in itself would entail violations of intrinsic nature values, per se, not even if knowledge is limited. The principal ethical criticism of commodification often seen elsewhere [13] was, somewhat surprisingly, comparatively modest among the respondents. Similarly, no one took a strong view and claimed that biodiversity offsetting leads to unvirtuous ethical attitudes towards nature; this was among the least of the concerns expressed, which also differs with much of the argumentation elsewhere [33]. When it comes to social justice, there was a striking difference in attitudes among the respondents, and the underlying motives for this did not become clear in the interviews and should, thus, be investigated in future studies.

A noteworthy observation in all the interviews was the focus that respondents placed on circumstances in practice, in each case of policy or offsetting projects. These often seemed to be decisive for the views taken—despite quite elaborate responses on challenging questions on ethics, protecting biodiversity was, thus, what counted most at the end of the day. Some talked about this in terms of “too much is already destroyed”, “we need to save everything [valuable that is left]”, and that non-human nature should be given a “half Earth” (compare e.g., [47]). At the same time, however, each respondent realised that development and exploitation will not completely stop, and in the dilemma arising, biodiversity offsetting, under the right circumstances, might be more preferable than not.

For this reason, the offsetting circumstances as such were of strong interest among the respondents. The more of a pragmatic attitude they took to biodiversity offsetting as a sufficiently acceptable conservation instrument, the more common it was to request stringent policy and effectual practise, which several researchers have also called for [48–50]. Central among these requirements was to impose restrictions for when offsetting must not be used at all, above referred to as “no go areas”, for example in order to not legitimise exploitation that risks to endanger high nature values, much in line with policy recommendations from the International Union for Conservation of Nature [42]. At the same time, though, if the mitigation hierarchy—which all respondents saw as fundamental—is applied, such valuable areas should not be offset anyway, other than as a last resort. Additionally, in such cases, protecting species and habitats with such values is a question for other conservation instruments rather than offsetting. However, the interviews did not focus on this aspect in any detail and the closer views here remain to be studied. It also remains to be further explored if the less critical view to biodiversity offsetting that became evident in the interviews is shared more broadly among environmentalists, and if the critical messages from some organisations should, therefore, be interpreted primarily as being part of campaign strategies, aiming to push for and achieve certain nature conservation policy results. This would then align with the clear requirement from most respondents to improve governance when offsetting is undertaken, for example, to restrict offsetting flexibilities in type, time, and space. Here, a need was also repeatedly underlined to always provide sufficient safety margins when carrying out offsetting projects, for example by using well-proportioned multipliers that compensate for scientific uncertainty on the one hand, and—according to some—for social injustices that might arise on the other. Such requirements on policy development have been expressed by voices being both critical and positive to offsetting, including in the scientific literature [4,14].

To conclude, both proponents and opponents to biodiversity offsetting have called for improved governance in policy and practice and could, therefore, potentially find common ground, despite different ethical views [33]. The respondents in the present study seem, in general, to take a view in between these disparate positive and critical voices, but consider that the scope for ethically acceptable offsetting, at present, is quite small, even though using the offsetting instrument in such cases can help to protect the diversity of species and habitats that is under severe threat around the world.

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