Peatland Code and Woodland Carbon Code FIRNS Biodiversity Methodology Public Consultation Summary Report

February 2025

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Introduction

In December 2023, the Woodland Carbon Code (WCC) and Peatland Code (PC) began work on a parallel set of methodologies to allow projects to either quantify the biodiversity benefit of their project or potentially to produce both voluntary carbon and biodiversity credits. The voluntary biodiversity market is still young, meaning there is a high risk of getting it wrong and the WCC and PC both need to protect their reputations as high integrity standards. However, the new biodiversity quantification methodologies can be a powerful tool to unlock additional private finance for nature restoration, whilst reducing the risk to both codes.

The PC and WCC ran a 30-day public consultation from January to February 2025 to gather views on how the outcomes of the Facility for Investment Ready Nature in Scotland (FIRNS) Biodiversity Crediting project might be applied in nature markets, including whether and how they could be implemented under the PC and WCC. The aim was to allow a wide range of stakeholder input into the biodiversity methodology as part of the FIRNS project. The respondents were given the option to answer questions relating to peatland metrics, woodland metrics, or both.

The survey focused on following key areas:

- Carbon+ credit, or 'explicit bundle'
- Using independent experts to review monitoring plans
- Chosen metrics for Woodlands and Peatlands
- What risks there might be with the chosen metrics
- General feedback on proposed methodology

The following supplementary consultation documents were published alongside the online survey:

Woodland and peatland biodiversity guidance document	This document provides background to the project, progress so far and future developments. Consultation questions relate to the sections in this document.
Biodiversity metrics white paper	This document sets out the biodiversity metrics we propose to measure for woodlands and peatlands.
Peatland Code biodiversity methodology	This document demonstrates the requirements for a peatland biodiversity project.
Woodland Carbon Code biodiversity methodology	This document demonstrates the requirements for a woodland biodiversity project.

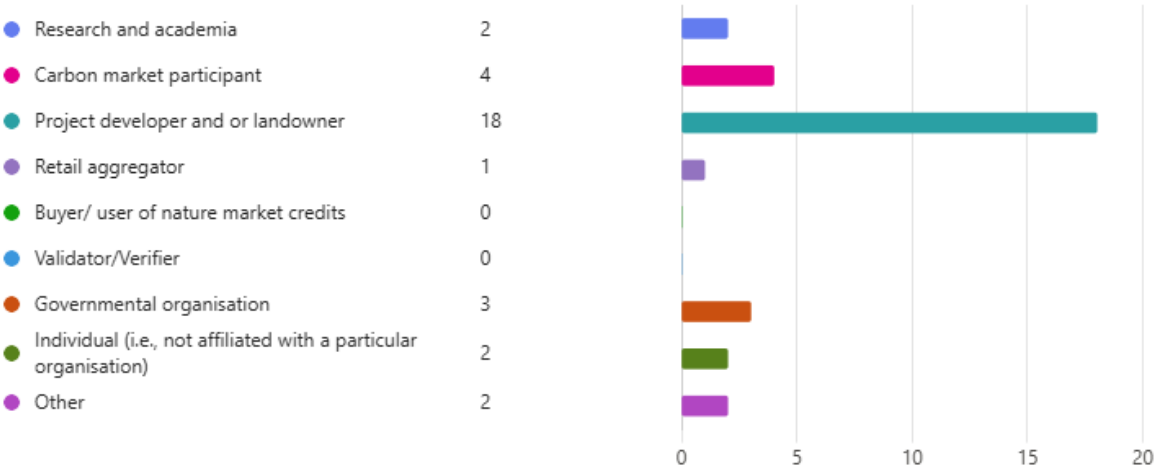
Respondents

There were 25 responses to the consultation.

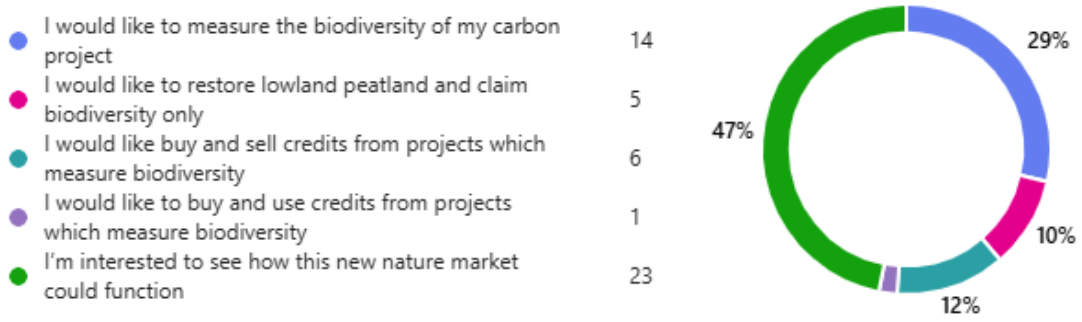
76% of all respondents answered questions related to peatland-specific metrics, and 68% answered questions that were related to woodland-specific metrics.

Over half of the respondents were based in Scotland (56%) followed by England (44%); there were no respondents from Wales or Northern Ireland.

The largest respondent group was “Project developers and/or landowners” (56%), with a mix of respondents across other sectors.



The respondents had varied interests in biodiversity methodology; the majority was interested to see how this new nature market could function (47%), 29% would like to measure the biodiversity of their carbon project, and 12% would like to buy and sell credits from projects which measure biodiversity.



The majority heard about the public consultation through the PC/WCC newsletter, and 83% would be interested to hear more or provide further feedback.

General findings

As an initial step, this project is proposing a Carbon+ credit, or ‘explicit bundle’ where biodiversity is quantified as part of a carbon project. Most respondents (60%) either agreed or strongly agreed with this approach, with 24% disagreeing.

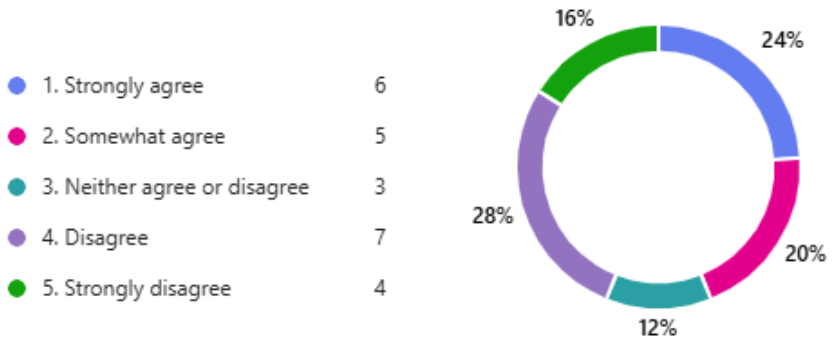
Some of the benefits of this approach were thought to be an increase in financing nature recovery, encouraging a more holistic ecosystem approach and allowing projects to maximise the biodiversity value of the project, including the areas that are not eligible for the formal codes but are still being restored. Potential risks that were identified included concerns over the potential complexity of this process; the costs, skills and capacity of undertaking biodiversity monitoring, uncertainty around the emerging biodiversity market and the need for more detail around proposed metrics.

52% of the respondents agreed that as the exact method of collecting data for biodiversity metrics might differ by site, any monitoring plan should be reviewed by an independent expert before monitoring begins, potentially via the Biodiversity Futures Initiative. Respondents who disagreed expressed concerns over this requirement slowing down projects, the potential high costs, or suggested alternative tools (e.g., the Natural History Museum’s Biodiversity Intactness Index tool that can be used remotely).

52% of respondents stated they would pilot the methodology and 67% of respondents would be very likely or likely to register a Carbon + project if available.

Most respondents (48%) agreed or strongly agreed with the approach of not having a ‘pending issuance unit’ for biodiversity, with 24% remaining neutral.

There was no consensus on the approach that only ‘new’ projects would be eligible, which would rule out the possibility of existing carbon projects adding biodiversity quantification.



Key findings for peatlands

63% of respondents found the proposed metrics suitable for baselining a peatland project, with 42% expressing the opinion that some metrics are missing. The additional metrics proposed by respondents included bryophyte and fly communities, aquatic invertebrates, soil eDNA, soil microbial diversity, deer densities and water quality. 26% considered some current metrics unnecessary and questioned whether a full taxonomic spectrum is always needed, and whether it is necessary in all cases to require surveys for both invertebrates and plants given the cost and time required.

Although the majority was confident in the chosen metrics, 74% also foresee challenges, particularly with extra monitoring requirements and financial costs for small projects.

79% of respondents agreed with the proposal of introducing a separate biodiversity credit for restoration of shallower peats that are currently ineligible under the Peatland Code.

Key findings for woodlands

63% of respondents found the proposed metrics suitable for baselining a woodland project. However, 74% also foresee challenges with the chosen metrics, particularly extra monitoring requirements, skills and financial costs. The difficulty of disaggregating the impact of the woodland creation on invertebrates and birds from wider effects of population increase or decline was also highlighted.

47% believe that some metrics are missing, with some respondents suggesting the inclusion of metrics such as belowground biodiversity, soil fungi, structural complexity and mammal abundance and diversity. There was also concern over the effect of climate change on biodiversity, and the flexibility of the proposed metrics to accommodate this.

Integration of feedback into project documents

Most of the public consultation feedback was integrated into relevant project documents. The “Future developments” section in the Woodland and Peatland Biodiversity Methodology Guidance Document was updated with new sub-sections that provide clarification and address some of the key themes that emerged from the feedback.

All feedback was reviewed and considered; however, some was found to be not directly relevant or outside of the scope of the project. This feedback is outlined in the table below, along with the relevant question and our response that explains why this feedback was not integrated

Question	Feedback	Our response
Are there any challenges that you foresee with these chosen woodland metrics? Are there any challenges that you foresee with these chosen woodland metrics?	I think communicating this to buyers might get tricky. It may devalue projects that score badly (which is a good thing) but I think there will be strong pushback from the timber players. Nothing new here!	Timber projects that do not prioritise biodiversity should be excluded from this process.
	A meaningful biodiversity credit must reward the restoration or creation of semi-natural habitats, or near-to-nature managed landscapes. We are concerned that land use change from already degraded landscapes to commercial non-native plantation forestry might be assessed as biodiversity gain, undermining the credibility of biodiversity metrics. Whilst some increase in biodiversity might occur, it may not be of desired species and/or relative abundance, the counter-factual is not the biodiversity present on the pre-existing land use, but the potential biodiversity from creation of the best semi-natural habitat on that site, for example native woodland. As for the peatland section above we think there would be value in checking with potential buyers to ensure the credits present them with useful information.	We agree that this is a challenging topic. We have tried to put in several safeguards in the WCC standard that put extra stipulations on timber projects to protect biodiversity. And again, this was left out of the future research section, but there have been internal discussions about assigning conservation values of 0 to species having a negative impact on UK ecosystems, such as Sitka spruce or rhododendron.
Are there any peatland metrics included which are unnecessary?	As we've mentioned in Q12 and Q14 the Defra metric is not a functioning structural metric for this purpose and would at the least need significant modifications. We think IUCN should consider whether a full taxonomic spectrum is always needed, and whether it is necessary in all cases to require surveys for both invertebrates and plants. We are not convinced the value of this information justifies the expense and time given that for many projects (especially on peatland) these diversity surveys are likely to correlate strongly. We agree with the Operation Wallasea focus on abundance alongside diversity and would prefer a method that sets a focal set of taxa that can be used as a litmus test of habitat restoration success.	The reason for defining our taxonomic metrics was to only measure those communities that our biodiversity panels determined to best represent the diversity of a site. How would you propose more specific focal sets of taxa? That is partially why the invertebrate metric is set up the way it is - a specific subset of invertebrates (one for peatland, two for forest) using one-two sampling methods is required, and the subset of invertebrates is independently reviewed at the beginning of a project to make sure that it is appropriate to the context.

As an initial step, this project is proposing a Carbon+ credit, or 'explicit bundle' where biodiversity is quantified as part of a carbon project. However, for peatland projects we are also proposing a biodiversity only credit. What are the potential risks of this approach?	We have significant worries about the draft methodology and credit proposal. We support the aims of the proposal and in particular of creating a bundled carbon-biodiversity credit wherever possible and appreciate the amount of work that has gone into this proposal and into avoiding greenwashing and other ethical risks. We believe this draft methodology needs substantial revisions, and that it has three main risks: we think the methodology could make projects commercially unviable for providers, we are not yet sure that it provides the information that is most useful to buyers, and we think the suite of metrics could give a misleading indication of true nature value. We realise our consultation response appears negative because where we have selected equivocal answers the follow-up questions are largely around risks and challenges, but we would appreciate the chance to discuss alternatives constructively, in terms of both high-level decisions and technical details. There are benefits to a bundling approach. It avoids the problems of stacking. It provides a route to fund shallow peat projects. And it could provide incentives for carbon projects to support more wildlife. The specific Carbon+ bundle proposed in this draft could risk undermining the market. It creates critical new bottlenecks in the approval process, which we believe will delay projects beyond the point where they need to spend public capital/restoration grants. The draft may double validation requirements, and we are concerned that the interaction with the proposed Community Inclusion and Benefits protocols is unclear. It adds greater volatility and uncertainty to credit issuance numbers by resting them on single survey events (c.f. providers' ability to observe and adjust for problems under the current codes). The lack of a PIU equivalent would severely affect project cashflow. We appreciate IUCN's ethical concerns about enrolling existing carbon code projects in the biodiversity standard, but it is a big problem that they would appear of relatively lower value for their remaining (≤100 year) lifespan. The Carbon+ bundle in its proposed form – a carbon credit with a label showing percentage uplift – may also not hold enough useful information for buyers to understand its value and support a price premium. This is not our main area of expertise, we consider it a potential risk and it would be helpful to know whether likely buyers support this presentation. There are also risks around the specific metric choices for this proposal, which covered in questions below).	We will not be able to enrol existing projects because the biodiversity credits would not be considered "additional". Projects that are already underway have demonstrated financial viability to move forward without biodiversity funding; so biodiversity uplift in that context would not be considered "additional". Much of the carbon market globally functions without PIUs, and the global consensus is that often, PIUs introduce more risk and potentially undermine credit integrity. Biodiversity is also site-specific, whereas carbon is much more general. Additionally, the lack of available data for accurately modelling improvements in biodiversity over time creates challenges in predicting what biodiversity on a given site might look like in the future. Between these factors, there is no way that PIUs could be issued for biodiversity at this time. It introduces too much reputational risk for the code, and there is little to no precedent for this in biodiversity credits. We are open to revisiting this as the market evolves, but broadly, the consensus in biodiversity crediting is not in favour of PIUs.
	One credit for 1% biodiversity uplift is not comparable to one tonne of CO_2e.	Yes - these are two different metrics and will develop differently. The explicit bundle can have different percentages of biodiversity uplift associated with carbon credits in the Carbon + option.

As the exact method of collecting data for biodiversity metrics might differ by site, this project proposed that any monitoring plan should be reviewed by an independent expert before monitoring begins, potentially via the BFI. Do you agree with this approach? If you answered no, please explain any concerns you may have.	I only answered "no" so I could suggest using the Natural History Museums Biodiversity Intactdness Index tool that could be adapted so it can be used remotely. This scores a habitat between 0 and 100 then allows you to model the uplift from a given intervention. It may be a cheaper and simpler approach but I am sure the BFI is good too. I'm happy to connect you to the NHM team if you think this is worth exploring.	BII relies on global biodiversity datasets that already exist. It would require using multipliers that do not represent the changes performed by the site. This also is a calculation method, not a verification body. Though the BII can be useful to reflect changes in land use intensity or landcover on a project, by relying only on remotely sensed data and general multipliers, it would be significantly less robust than almost all biodiversity credits. Additionally, the multipliers used in BII are better suited for land currently under some type of human use, as opposed to land slated for restoration.
	It would be better to determine the methods. Have a framework of existing/recognised methods that can be used. e.g for birds WeBs or BBS. We can see the rationale for an independent review but some orgs like ourselves have the in house expertise to produce robust plans and an external review would add an unnecessary process step and cost.	The SRUC deliverable for this project will be standardised metrics to a certain extent.
	We believe independent expert review is essential, but question the need for approval in advance, and for approval by only a single body. This approach creates a bottleneck that will prevent peatland projects accepting the most common public grants. Typically these confirm funding in the Summer for work over the Winter season, allowing too little time to pass through validation and then conduct the baseline survey. The approach is also a significant increase in validation complexity and costs. As an alternative we would support (as with the carbon codes) firm guidance on what makes an acceptable baseline and monitoring plan, for each of the project types likely to be common in the UK. Independent review could then take place after monitoring has begun. The Biodiversity Futures Initiative (BFI) is an impressive organisation but is relatively small for this role and may struggle to resource it. BFI's fees and terms are not necessarily fixed, and hardwiring it into the code could create a hostage to fortune. We would prefer an approach that sets standards for validation bodies to meet. It would be helpful and cost-effective if a single organisation could competently verify both carbon and biodiversity impact.	For the time being, we are partnering with BFI to be the independent body, but our process does not explicitly exclude other independent assessors. It is simply that BFI does meet the criteria for an independent assessor.

	We struggle to get validators in rural areas already, adding more hoops would slow down projects.	Nature markets are a mosaic of different players. When government and NGO's signal something is a priority, through policies or regulations, it is the role of the private market to respond by addressing needs. Already since the inception of biodiversity crediting just 2 years ago, there has been a significant increase in companies whose primary service is biodiversity monitoring. As the market matures, there should be greater demand for these services, which should be met with a greater supply. Additionally, we need to create spaces in the market where these experts can get paid in order for people to continue training in these skillsets.
As we don't have tools to predict biodiversity outcomes, any quantification of biodiversity uplift will occur at verification. What are the risks of this approach?	The fact that there is no possibility of predicting biodiversity uplift highlights the fact that this metric is measuring something over which the project developer has no control. Therefore, any biodiversity uplift measured is purely a matter of chance. There is no additionality, and no case for a buyer to pay for it. What happens if factors such as global climate change cause biodiversity to decline over the project period (highly likely)? The project developer has no control over this either. Will they be liable for the loss?	With both of these credit types, the credits would only be sold after verification. And with Carbon+, they are not telling funders that there is a guaranteed uplift at this point.
	The fundamental risk is that what we consider to be good biodiversity today might be rather different in the future. The value we put on certain arrangements of plants and animals reflects both what we have seen as 'natural' in the past, and our on societal biases. At worst, this approach could force land managers, on pain of economic loss, to persist in management techniques and goals that have become unsustainable or unresilient. Until we have an answer to 'how do we account for externally driven changes in valuation of biodiversity, I think this approach is flawed.	PC and WCC consistently update their standards to reflect best practices, and that will continue into the future. That is the nature of these markets - continuous iteration as better science comes out. Changing how we value biodiversity is the entire reason nature markets exist. Slight changes to how these markets develop is how these markets have always developed. Our approach will always be based on the best available evidence, but increasing nature investment is critical.

Do you foresee any challenges with the chosen metrics?	This will drive a sudden increase in the amount of invertebrate surveys required - will there be sufficient surveyors with the technical expertise to conduct these surveys to meet this demand?	The SRUC guidance document will provide a list of approved methodologies. We cannot control the external markets around nature markets. However, as government and NGO bodies signpost the direction regulations are going, the private market then responds with increased innovation to deliver. Already, since the inception of the biodiversity market just two years ago, there has been a significant increase in companies that support or deliver different types of environmental monitoring. These are just the growth pains of a new market, which are necessary for a new market to develop. But this is explicitly outside the control of the standard.
	We've covered the general challenges in Q12 above, so are adding some of the detail here. We have several concerns on how the Operation Wallasea framework is applied in this draft. First that the reliance on single survey events creates a greater fluctuation in credit issuance/scoring than the predictable Pending-Verified carbon unit system. Second that without reference sites, the OpWal method changes its calculations to be markedly more onerous: e.g. instead of setting the reference site population as the fifth-quintile relative abundance target (i.e. maximum score) it uses a score that is 8 times the baseline. Third, the requirement for multiple complex baseline surveys in advance of capital work will delay projects and often make them unviable, without proportionate benefits to accuracy. It would be helpful to discuss the minimum criteria for adequate baseline data and reference sites. The Defra metric is problematic because the Uncertainty and Risk multipliers will cause scores to increase rapidly over time, out of proportion to any habitat improvements. This is a problem in itself, and within an Operation Wallasea framework it is also then unlikely to be the median metric and so this spatial information will usually be lost. There are more fundamental problems with the Defra metric because the algorithm multiplies together ordinal scores (in this case, qualitative decisions that are not on a linear scale) to reach its final biodiversity unit assessment – this means that in formal mathematical terms the final result is not a valid proxy for habitat quality. The Operation Wallasea framework has specifically been designed to avoid this sort of mathematical problem by using a median change instead of a multiplicative one. We would recommend a more focussed use of some of the Defra metric's results, such as using the percentage of the site that is at High/V.High Distinctiveness and Moderate Condition, instead of using the metric's final biodiversity unit reading.	We never stated that projects can't use a reference site; we just highlighted that the operation Wallacea method allows for calculation without one. However, one major piece of feedback we received earlier in this process is that requiring a reference site would stop this project in its tracks. It is too much up-front cost for developers and would be especially challenging in peatlands. Peatland restoration is relatively new, and the methods are constantly being improved. Finding a mature reference site, near your project, using similar restoration techniques, would not be feasible. With regard to the Defra metric, this is something we discussed but didn't include in the documentation. We would need to remove some aspects of the metric to transfer it from planning policy to biodiversity crediting. We have added that to the "future research" section of the updated guidance document.

For peatlands this project is also proposing a separate biodiversity credit for restoration of shallower peats that would be ineligible to claim carbon credits in the Peatland Code. Do you think this is the appropriate approach?	Have concerns around decreasing the attractiveness of wind farms to landowners due to excluding them from other markets such as carbon credits.	We want to discourage the construction of wind farms on peat.
General comments or feedback	Would biodiversity crediting only be open to 'native' projects? Wallacea seems to suggest that all species must be naturally occurring. Would this exclude all diverse conifer planting projects?	Operation Wallacea does not require every counted species to be explicitly native. However, the community similarity index will add higher value to native projects. Additionally, in the future research section, we are exploring how if we could devalue species that could lead to negative long-term outcomes (e.g. sitka spruce, rhododendron) in the final quantification.
	Operation Wallacea seems to assume a maximum project length of 30 years. Is there any reason that 100 years would not be possible? Is there any chance that the carbon contract length and the biodiversity contract length would be different and if so how would this be reflected in the units / vintages?	The Operation Wallacea method uses 30 years as an example, but there isn't any explicit limit like that.
	The whole process is currently very slow and lacking contractor / auditor availability with the added uncertainty of peatland action funding being withdrawn. Anything to add certainty would help landowners in making decisions.	Our aim is to drive additional funding streams in peatland restoration, which would drive additional funding and therefore capacity within the PC.

How confident are you that the metrics selected will be appropriate to baseline biodiversity of a project? If you selected “not confident”, please provide a reason.	From my experience of using the biodiversity metric and commissioning taxonomic surveys I could envisage this metric easily costing £100 per hectare - £10/ha/year on a 10-year cycle, or £5/unit on a project yielding 2 carbon units per hectare. I am not confident that this will yield an uplift in value that will cover these costs and not simply be a ‘license to operate tax’ on peatland projects which will have to be found upfront – necessitating greater involvement of third-party investors which results in a net loss to the rural economy. No case has been made for how these metrics will influence changes in management of the peatland to enhance them; unless these can be detailed, they will have zero beneficial impact on nature over the original carbon project.	The helpful piece of this critique applies to the next round of funding. For the sake of this project, we are not prescribing new management practices, but rather a mechanism for measuring changes in biodiversity associated with restoration or habitat creation activities. "No case has been made for how these metrics will influence changes in management of the peatland to enhance them" - This should be included in the second round of piloting to ensure the market case for carbon+ credits.
	In general the combination of several metrics into a single number risks oversimplifying the ecological relationships of biodiversity in peatlands, and a very robust methodology and clear objectives would be required to justify this approach.	The main aim of nature market and biodiversity credits is to take the complexity of ecosystem services and biodiversity and reduce it to a single unit that can be used to drive investment. SRUC document will provide further guidance on methods of data collection.
	There seems to be overlap between the use of plant taxonomic metrics and structural metrics if they also use plants, but again without more details I can't elaborate. The biodiversity value of bogs is not high species richness or a large number of rare species, and this will also differ for fens and wetlands, how is this metric account for it or reflecting it? I wonder why plant, bird and invertebrates have been chosen, this selection does not provide a full picture of biodiversity.	We ultimately cannot complete an entire assessment of all biodiversity on a site - that would be a PhD dissertation level assessment. These metrics were chosen by multiple rounds of meetings with biodiversity experts. The Community similarity index helps adjust values for the unique habitats, and the NVC for fens is to understand the complexity of those metrics.

	Without seeing the details on the proposed metric, it is unclear how this would affect the departure from the proposed current metric system.	The SRUC guidance document – published in March 2025 - will provide a list of appropriate methods for measuring each metric.
	On the overall framework metric, we consider the Operation Wallacea method to be one of the better metrics available but note it is still an inexact proxy and can provide volatile and unpredictable results in situations that cannot be fully controlled by the site manager (for example a bad summer's weather or the introduction of certain invasive non-native species). If credit issuance is uncertain then this could undermine the commercial case for new projects. The proposal's reliance on pre-intervention surveys creates a problem by freezing out existing carbon-only projects that are designed for wildlife. These projects often market themselves on their nature benefits and could lose financial value if buyers start to see them as second-class credits. This is a pragmatic/operational problem and not an in-principle objection to a preference for pre-intervention baseline surveys. The proposed absence of reference sites will markedly reduce the credit issuance, and according to Operation Wallasea means that structural metrics (e.g. the Defra metric) cannot be used. We would prefer reference sites to be found and believe it would be realistic for IUCN to build up a portfolio of these for shared use by all accredited projects. The sub-metrics/surveys chosen here could create problems as well. The basket required would add significantly to survey and validation costs. We have specific worries about individual metrics as well. The Defra/BNG metric is not a reliable proxy for habitat quality and is designed for one-time use (i.e. cannot be repeated at post-intervention validation points), so would need modification for this credit proposal. The taxonomic metrics suggested – especially for invertebrates and plants – will be expensive ways to quantify diversity. We would prefer a focus on quantifying abundance within the taxonomic groups, as recommended by the Wallasea guidance, and it should then be possible to design a cost-effective refined set of species or assemblages which act as indicators of the state of the habitat and the success of restoration. More information is needed on bird survey methods and it would be good to explore whether/how existing survey information could be used. Results for taxonomic metrics will be very sensitive to what is happening on neighbouring land, including deer management and wildlife crime risks. There is a specific need for metrics/baselines for forest to bog restoration	Again, carbon only projects designed for wildlife are fine, but biodiversity credits are considered non-additional. it is unfortunate, but the regulations around existing nature markets would not allow for already started projects to benefit. our aim for the community similarity index metric required a collection of reference sites to assign those values. This level of monitoring, however, was not in the budget for this first round of design. With regards to the metrics, we had multiple rounds of interviews with ecological experts to determine this basket of metrics. We had a public consultation for our biodiversity white paper, where we collated feedback and then conducted round-table conversations with woodland and peatland ecologists. There were a few typos in the WCC standard, which may have caused some confusion about the metrics. We understand the concern about mobile metrics and have included that in our updated "future research" section. but the Defra metric for woodlands was considered appropriate in our public consultation as well as the round table conversations. And the Defra metric has been used on multiple operation Wallacea-directed projects in England.

	projects as well as for open peatland restoration. We are concerned by the difference in presentation between Carbon+ (i.e. a carbon credit with attached information on biodiversity) and pure biodiversity credits (i.e. a single-class biodiversity credit with no attached information). If it hasn't happened already we would suggest discussion with potential buyers to identify the most useful presentation.	Forest to bog is not presently included in eligible activities for the reasons you mentioned. SRUC will be delivering a learning package that outlines eligible sampling activities by March.
	The key challenge with quantifying the effects of land use change on biodiversity is to consider how to avoid over-reliance on general assessments of species richness and abundance, or biodiversity indices that rely on these metrics – including this proposal. In any land use change scenario there will be losses of biodiversity associated with the original land use/habitat, and gains of biodiversity associated with the target habitat type. In some scenarios there may be intermediate biodiversity gains that will be lost as the target habitat develops. For example, in woodland creation, open habitat species will be lost, early successional scrub habitat biodiversity will develop first, but this will eventually be lost to closed canopy woodland specialist species. Although the Operation Wallacea methodology is considerably better than the current WCC method of self-assessment of Woodlands and Biodiversity in the Woodland Benefits Tool, it is still not able to account for this. We have offered to work with Scottish Forestry/Woodland Carbon Code on a meaningful biodiversity method and we repeat that offer once more here. Please also see our comments on the Operation Wallacea framework and Defra metric in Q12 and Q14 above. Problems with the Defra metric are exacerbated for woodland creation projects as it scores priority-woodland creation very poorly. This will further exaggerate on-paper gains if the metric is repeated at verification points, and may also lead to confusion as the statutory guidance attempts to fix this problem by automatically steering most new projects into the miscellaneous 'other woodland' categories.	Thank you for bringing this up, it is also something we omitted from the public consultation. We wanted further research on how to deal with the fact that the habitat disruption from restoration could potentially reduce biodiversity in early years. Additionally, this is why we are committed to developing the community similarity index as one of the top priorities of the future research of this project. This would help ensure that we are appropriately valuing the changing biodiversity of projects where we are changing landcover categories.
In your opinion are there any peatland metrics missing? If yes, what metric do you feel is missing and why?	IUCN could consider assessments of how well sites are being managed – essentially moving away from a purely outcome-focussed model and looking as well at whether expected/good-practice site management activities are taking place. We also need to understand the links to Community Inclusion and Community Benefits measurements.	We are explicitly moving towards outcome-based instead of action-based, as this is how most biodiversity credits work. Just saying you are doing good practices doesn't necessarily guarantee an uplift. That type of approach works for "certifications", but for credits, you can't sell a unit of good management plans. Biodiversity credits are focused on outcomes.