

Guidelines on Business and KBAs: Managing Risk to Biodiversity

A note about the consultation process:

The Guidelines have been co-written by representatives of the 12 KBA Partners (BirdLife International, IUCN (including WCPA), Amphibian Survival Alliance, Conservation International, Critical Ecosystem Partnership Fund, Global Environment Facility, Global Wildlife Conservation, NatureServe, Rainforest Trust, Royal Society for the Protection of Birds, WWF, Wildlife Conservation Society). The Public consultation on DRAFT 2 of Guidelines started on 2 December 2016 and ended on 17 March 2017. During this period, we reached out to over 14,000 organizations (using IUCN and the KBA Partners' networks). We conducted 8 webinars (for ICMM, IPIECA, WBCSD, BirdLife and WWF) to introduce the Principles and Recommendations, and the process. In total, we received 33 submissions, some of which representing more than 1 individual or organization. The comments received (captured in this document) were discussed by the KBA partners during two face to face meetings (in May and September 2017) which led to the final version of the Guidelines. Also note that we have deleted all names and affiliation of reviewers to respect the request for anonymity expressed by some. The reviewers are now numbered.

Reviewer #	Line (Draft 2)	Reviewer Comment	Response
1	18	It would be interesting here to complete 'commercial banks' with other relevant financial institutions for instance bi- and multi lateral development banks, investment funds, lending institutions etc.	We did not break down "financial institutions" in the various sub groups as we would have then to do so for all groups mentioned. However, the diversification by type of financial institution will be a critical element in the communication and dissemination strategy of the final document.
1	42	The reference to 'local stakeholders incl. affected communities and conservation organizations' might be too restrictive in a sense where others stakeholders should be consulted. Some KBAs might host species unique and thus concern all mankind. Equally some development might be wished by local communities but considered not satisfying for others groups.	The identification process of a KBA and the role of local stakeholders are defined by the KBA Partnership see: http://www.keybiodiversityareas.org/kba-partnership/kba-national-coordination-groups
1	73	'unsustainable use' consider adding 'of natural resources'	Text has been modified.
1	154	Insure consistency with wording in the executive summary (cf. line18)	The section has been deleted
1	291	The reference detailing what rights-holders refers to appears here for the first time while the concept is mentioned several times before.	The revised document has hopefully made the document more clear in this regard.
1	Principle 3	To improve temporal coherence (length of impacts period vs. brevity of a single date) I would suggest not to put a date in the wording of that principle and to simply refer to the adoption of the document.	The cut off date now is the issue of the guidelines.
1	Rec 1.4	I fully endorse the fact that offsets of residual impacts caused on the biodiversity elements for which the site qualifies have to be the exception. The recommendation goes in that direction. However, they are so strict that I foresee only major player will be in capacity to satisfactorily follow them. It raises the crucial issues of enforcement and compliance of these recommendations as well as possible inspection.	The issue of enforcement is clearly critical. We don't venture in that discussion as these Guidelines are considered purely voluntarily.
1	Rec 6.5	The text solely refers to indigenous peoples I would suggest it also includes local communities.	This is a highly complex issue and for this reason a separate web based resource will provide links with reputable and specific guidance. However, the KBA partners decided to maintain the reference to obtain FPIC when indigenous peoples and local communities are impacts (in the section about "Conditions for successful implementation" and "Guideline 5).
1	Rec 6.7	The text solely refers to indigenous peoples I would suggest it also includes local communities.	This recommendation is now more clearly expressed under Guideline 5 Limits to Biodiversity Offsets ("The development and offset should both have obtained the free, prior and informed consent of any impacted local communities".
2	74	Technically KBAs are not 'disappearing', but rather are losing their ecological value or are unable to sustain the diversity and assemblages of species and genetic diversity they are recognised for. The equivalent in World Heritage would be to lose the qualities contributing to 'Outstanding Universal Value'.	Text has been modified.
2	112	These paragraphs place community involvement as being subsequent to the identification of a KBA. Is there a role for communities in the identification of KBAs? Furthermore, nothing is said in these sections about access, license, tenure and rights. What is the role of self determination in these sections?	This is part of the KBA identification process. See in particular http://www.keybiodiversityareas.org/kba-partnership/kba-national-coordination-groups
2	138	Can individuals in communities themselves use the KBA Standard (i.e. outside the context of CBOs)?	This was not the intent of the Guideline which are designed for the implementation of the Mitigation hierarchy to mitigate impacts on biodiversity linked to business activities.
2	189	The absence of impact is not the only case where there is the opportunity to contribute to KBA conservation and improved management.	This is now captured in various Guidelines: Guideline 12 Additional Conservation Offsets; Guideline 13 KBAs as targets for offsetting impacts elsewhere; Guideline 14 Sharing biodiversity data.
2	197	This assumes that impacts are assessed and managed, but this may not always be the case (e.g. in developments that fall below the thresholds for triggering EIAs or SEAs. Thus the principles should start with a due diligence or scoping to determine if the operation is in a KBA and that should trigger an assessment and application of the principles.	The Guidelines (formerly known as Principles and Criteria) focus now on the mitigation hierarchy and any specific measure that is considered to be additional in situations where the business activities affect the KBA biodiversity element(s). Therefore processes such as impact assessments have not been mentioned. Generally, this was a decision made based on many comments which defined the initial version of the Principles and Criteria a duplication and repetition of many general guidelines already in existence.
2	206	This is the first mention of offsets, and the reader has little context of the term or its meaning at this stage in the document. Worth including a footnote or cross reference to the definitions section.	Offsets and their design are now only included in Guideline 5 which builds on the IUCN's Policy on Biodiversity Offset.
2	218	Should this be a new bullet?	Yes! The section on IBAT is now a separate box.
2	230	Include definitions for: trigger element; biodiversity element; expert; appropriate vehicle for financing	Some of the words have now been deleted. All others are now defined in the Glossary.
2	257	The application of the mitigation hierarchy (and particularly specific elements of it relating to technical design, where IP is an issue) is often not participatory.	True. The need for an inclusive and transparent stakeholder and right-holder engagement process is highlighted now in the "Conditions for Successful Implementation" (In Section 3).
2	Principle 1	Change 'positive impact' to 'positively impact'	The Principle has been dropped.
2	Principle 5	The recommendations under this principle should reflect key elements that a landscape approach implies to managing impact, including the concept of a mosaic of land and resource uses that deliver a suite of benefits (multifunctionality), the need for fair processes of negotiating trade-offs between competing resource uses, the role of creating and/or strengthening institutional structures for inclusive and representative governance over resource management, the importance of adaptive management and learning frameworks to inform that adaptive approach, and clear rights and responsibilities.	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
2	Rec 1.1	Drop 'in other sites; and change 'relevant' to 'feasible'.	The Recommendation has been dropped.
2	Rec 2.5	Drop 'the preventative mitigation measures'	The recommendation is now replaced by Guideline 2 and Guideline 3 which use the terminology "Avoidance" and "Minimization".
2	Rec 2.6	Who determines who is an 'expert' how is 'expert' defined?	The revised text (See Guideline 4) refers to "empirical expert advice" rather than "an expert".
2	Rec 3.3	Who is liable for the costs associated with impacts prior to the cut-off date?	It would be the business responsibility (as now clearly stated in the title of the relevant Guideline (Guideline 10 Responsibility for existing operations)
2	Rec 4.4	What does an appropriate vehicle mean?	The wording has been deleted from the new Guideline 7
2	Rec 4.4	Drop sentence starting 'without these safeguards...' as these explanations are elsewhere in the text.	The recommendation has been deleted

3	2	Please don't start the statement with "TO"; IUCN convened a four-year consultative process involving hundreds of experts.	Section has been fully revised
3	3	To support the needs for a common approach to the identification of sites of biodiversity significance	Section has been fully revised
3	14	A set of universal Guiding Principles and Recommendations the outline how businesses should operate in and around KBAs was developed through the support of Tiffany & Co. Foundation, under the coordination with IUCN. It will provides guidance to business operation in and around Key Biodiversity Areas and the KBA Partners. Target end-users for the business guidance are individual operators, industry associations, sectoral initiatives, certification organizations, and development and commercial banks.	The section has been redrafted.
3	178	The Principles and Recommendations apply to all businesses of all sizes and sectors. It also applies to all Global and Regional KBAs meeting the criteria and thresholds in the KBA Standard. Also, the Regional KBAs meeting existing regional criteria and thresholds in marine, freshwater and terrestrial ecosystems. These are the minimum standards that should apply to businesses.	The reference to Regional Criteria has now been deleted as their development is still pending.
3	196	The "module"?? > "the set of recommendations"	The word "module" has been abandoned.
3	Principle 1	"business causes no long term, negative impact, and ideally positive impacts..." >qualifiers or situation, will help understand the phrase	The Principle has been dropped.
3	Principle 2	Definition of No Net Loss and Net Gain	The Principle has been dropped. The definitions are however now in a Glossary.
3	Principle 3	"eliminates", "reduces" and "compensates" >3 choices or response situation? >either eliminates, reduces and compensates	The Principle has been dropped. The reference to eliminate, reduces and compensate is now made more clearly through the reference to the mitigation hierarchy (see page 13 of revised document).
3	Principle 4	"early scoping" >could be one of the implementation standards >underlying principle could be "the business must set aside tangible technical and financial support to mitigate existing and potential hazards, risks and/or threats to KBAs"	The Principle and associated recommendations have been now restructured. Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured..."). Furthermore, Principle 4 Limits to impact restoration and Principle 5 Limits to biodiversity offsets also refer to "expert advice" and testing the effectiveness of the plans.
3	Principle 5	"application of landscape, watershed ..." >could an implementation standard >the underlying principle could be "business should integrate the landscape, watershed or seascape approach in its operation and management plan"	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
3	Principle 6	the word "considers" somehow weakens the "Principle"; indigenous peoples rights must be recognized and respected >"Business recognize and respect the needs, rights and livelihood .. of indigenous peoples associated with the KBAs."	The Principle has been dropped.
4	112	I strongly support the discussion of the value and importance contributions of indigenous peoples that begins on this page...and continues throughout the document.	Section has been retained. It's now in Section 1 "Business and KBAs" see paragraph "... and for people..."
4	230	There should be a definition of "compensation." The term is used in several sections in discussing how businesses can compensate indigenous people for impacts on their livelihoods. I think "compensation" should be defined to include (specify or at least recommend) direct financial support to restore livelihoods and also to make it possible for them to participate in community management work.	There isn't a specific definition for compensation but it is context dependent. The term does no longer appear in the Guidelines.
4	297	This is excellent as it encourages full disclosure of the measures taken to assure that biodiversity is protected and enhanced. If this information is provided in Annual Reports and Sustainability Principles it will enable concerned customers and investors to buy from and invest in these companies.	This message (Transparency and Integrity) is now captured in different Guidelines so made even stronger (See Guideline 6 "Biodiversity impact monitoring" and in particular the last bullet point; and Guideline 11 "Reporting on KBAs as part of the company's environmental performance".
4	Intro	I think that somewhere near the beginning of the document there should be more discussion of the significance of considering climate change impacts on biodiversity. The IUCN "Global Standard for Identification of Key Biodiversity Areas" has a fine paragraph which would be helpful if it were included at an appropriate place in the Principles and Recommendations": "Climate and environmental change . Environmental changes resulting from a range of stressors, notably climate change, may affect the biodiversity in a KBA to such an extent that the site ceases to qualify, which will be determined upon re-evaluation (see point 9). It is also possible that a KBA may increase in importance as a result of climate change or that new sites will qualify. Re-evaluation of sites every 8-12 years will be important for maintaining accurate data over time."	The reference to climate change has been added in various places : Section 3 paragraph on "Conditions for successful implementation"; Guideline 4 Limits to impact restoration; Guideline 5 Limits to biodiversity offset; and a fact sheet on KBAs and Climate change will be available through the web based support resources.
4	Rec 4.5	This is where capacity means a commitment to direct financial support to make it possible for indigenous peoples (and local communities if needed) to participate in community management work.	This is now expanded and included in the paragraph "Conditions for a successful implementation"
4	Rec 6.8	I suggest that businesses should be required to do this – not just consider it: Again, this is where there should be direct financial support to make it possible for them to participate in community management work.	This recommendation was considered too vague. It has now been replaced with a more detailed text under "Conditions for a successful implementation".
5	37	Define clearly what is meant by 'around' KBAs: is it the area outside the KBA itself in which any project activity has a potential negative impact on the KBA (direct, indirect or cumulative) – i.e. situations where the KBA and/ or its supporting ecological processes fall within the area of influence of a proposed activity?	The scope has now been changed to "businesses ... having and potentially having direct, indirect and cumulative impact on a Key Biodiversity Areas". More specifically, in the Guidelines we refer to the "... biodiversity element(s) for which the site qualifies as a KBA..." or the "element(s) triggering the identification of the KBA".
5	39	Is 'minimal' correct here? Should this not be 'minimum' (e.g. as in 182)?	This concept has now been moved under "Acknowledgment" and word minimal has been replaced by minimum.
5	44	Suggest include in this The Guiding Principles will give affected communities, public interest groups and conservation organisations a benchmark for performance expectations of businesses through a standardised approach.	This concept will be used in the communication material that will be developed to promote the Guidelines.
5	110	Would depend on the needs of biodiversity, but also the specific case and context's opportunities and constraints/ threats, including e.g. institutional, political and socioeconomic factors.	Section has been reworded (see Page 10, Key Biodiversity areas, protected areas, and conservation priorities.).
5	193	In some cases companies have liability for indirect or latent impacts that only manifest some time after closure of an operation. Would it be useful to make a note of such instances (e.g. decant of acid drainage decades after coal mining).	Change not included as too specific to a sector/activity.
5	209	Include 'recognising limits to what can be offset'.	This is now captured in Guideline 5 Limits to offsets.
5	238	Indirect Impact is an impact which occurs as a result of another change which is caused by a planned intervention, and may manifest some distance away or downstream of the project site and occur later than that intervention. May also be referred to as a secondary impact.	The definitions of direct, indirect and cumulative impacts have been now borrowed from BBOP (2012) and have now been included in the Glossary .
5	238	Suggest add: Indirect impacts include induced impacts which occur as a result of socioeconomic changes catalysed by a project.	The definitions of direct, indirect and cumulative impacts have been now borrowed from BBOP (2012) and have now been included in the Glossary .
5	250	Where the biodiversity gain exceeds the loss (i.e. insert 'biodiversity').	Definition has been modified.
5	259	...formalised in (or after) the 1970s or 1985 (rather than 'since')	Text has been deleted.
5	266	Suggest 'components of biodiversity that trigger or support an area's qualifying as a KBA' rather than 'certain components'.	The specific text has been deleted. However in other sections the reference is now to "trigger elements".
5	267	Could include reducing the risk or probability of impacts to biodiversity.	The definition has been replaced now by BBOP (2012) definition.

5	269	Footnote 7. Suggest add 'unless restoration success has been clearly demonstrated within acceptable timeframes in previous restoration trials'.	Footnote has now been deleted. Reference to the challenges of restoration are now captured in Guideline 4 "Limits to impact restoration".
5	278	Additional Conservation Actions may not have any obvious link to, and/ or do not target, the same biodiversity as was impacted by a project.	ACA no longer included in the box with the definition of the Mitigation Hierarchy to avoid confusion. ACA now defined in the Glossary.
5	291	Suggest explicitly include conservation NGOs and community-based organisations.	To avoid forgetting any group we simply stated "... sectors of society". Furthermore, a Guideline on Participation and consultation has been now added (See Guideline 9).
5	303	Line 303: Integrated and enduring management.	This section has been deleted as not considered specific to KBAs
5	Goal	Suggest 'ecological and supporting socioeconomic and cultural contexts', since livelihoods go beyond simply 'social' and 'cultural'.	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
5	Principle 1	Business causes no long-term, negative impact, and ideally delivers a positive impact(s), on the biodiversity element(s) for which the site qualifies, or is expected to qualify, as a KBA, or on its supporting ecological context.	The Principle has been dropped.
5	Principle 1	Additional Recommendation: Where it is not possible altogether to avoid all impacts, every effort should be made to minimize residual impacts, limiting their intensity, extent and duration as much as possible.	Guideline 3 now specifically stresses the importance of early minimization.
5	Principle 4	It is suggested that funds be set aside for ongoing management (to ensure that planned avoidance and minimization are achieved), as well as for restoration and offsets. Suggest delete 'as a precautionary action'.	Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").
5	Principle 4	Additional Rec: Suggest cross reference the recommendations pertaining to offset design and implementation planning and provisions given in earlier Principles.	Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured..."). Footnote 5 now cross reference this Guideline with the financial guarantees defined in the IUCN Policy on Biodiversity Offsets.
5	Principle 5	Additional Rec: Suggest include the need for collaboration and co-operation in minimizing and managing potential induced impacts arising from socioeconomic changes catalysed by the presence of development in or around KBAs. May involve influencing land use/ settlement planning in the vicinity of the KBA and / or promoting alternative and sustainable livelihoods.	The Guidelines have been redesigned to be much more focused on the actions specific to KBAs and to avoid being read as prescriptive. Therefore references to collaborative approaches have been deleted.
5	Rec 1.1	Recommend include 'respecting that some impacts would not be able to be offset and would constitute unacceptable harm and irreplaceable biodiversity loss'.	This concept is captured more clearly in Guideline 5 Limits to biodiversity offsets.
5	Rec 1.2	...recognizing that some biodiversity is difficult – and in some cases impossible – to restore.	Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.
5	Rec 1.4	The 'robust, outcome-oriented offset plan' must make provision for monitoring and adaptive/ corrective management actions. Suggest include (perhaps in relation to 'broad stakeholder agreement on offset acceptability') the need to ensure that the proposed offset does not displace current impacts on biodiversity to other, equally or more important sites for biodiversity conservation (i.e. leakage risks).	A stand alone Guideline on Monitoring (Guideline 6) is now established.
5	Rec 2.5	'...prioritized due to the uncertainty of restoration and offset outcomes'	The recommendation is now replaced by Guideline 2 and Guideline 3 which use the terminology "Avoidance" and "Minimization".
5	Rec 2.7	Suggest include (perhaps in relation to 'broad stakeholder agreement on offset acceptability') the need to ensure that the proposed offset does not displace current impacts on biodiversity to other, equally or more important sites for biodiversity conservation (i.e. leakage risks).	Guideline 5 recommend the application of the IUCN Policy on Biodiversity Offsets which also refers to leakage risks.
5	Rec 2.8	Suggest add a 'so what' along the lines of 'In these cases, offsets beyond the KBA but benefiting ecological processes that support the maintenance of the KBA should be targeted'.	The focus is now moved from "within the KBA" (Rec 2.8) to "... achieve Net Gain on the trigger element(s) affected by the project..". These could be within the same or in other sites.
5	Rec 4.3	The predicted outcomes of restoration will not automatically or always be 'no residual impact', so would recommend revising this wording. E.g. "To ensure that the restoration stage achieves the intended outcomes (preferably no residual impact), the business will plan, design and test the restoration prior to the project implementation.	The wording has been revised (see Guideline 4)
5	Rec 6.4	It is suggested that compensation for harm take the form, preferably, of in kind compensation rather than cash payments.	This issue has been now eliminated from the scope of the Guidelines.
5	Rec 6.6	It is suggested that compensation for harm take the form, preferably, of in kind compensation rather than cash payments.	This specific requirement has not been included in the revised Guidelines.
5	Rec 6.7	In the absence of support, the business will take remediation actions that are negotiated and agreed with the affected indigenous people.	This recommendation is now more clearly expressed under Guideline 5 Limits to Biodiversity Offsets ("The development and offset should both have obtained the free, prior and informed consent of any impacted local communities".
5	Rec 6.8	Suggest that 'have a positive role' be expanded to include 'and benefit materially from' the conservation and sustainable management of KBA biodiversity values.	This recommendation was considered too vague. It has now been replaced with a more detailed text under "Conditions for a successful implementation".
6	2	"to support the need for a common approach" - what need? Evidence for this need?	The need referred to the development of the KBA Standard and not the Guidelines for Business. This message is now captured in the new Foreword signed off by the KBA Partners. For more information about the development of the KBA Standard see keybiodiverprocess, starting from the formation of the WCPA-SSC Joint Task Force see www.keybiodiversityareas.org
6	4	"agreed scientific criteria and overarching methodology" - agreed by whom?	This point again referred to the KBA Standard. The reference has now been made more clear both in the Foreword, and the section 2 "More about KBAs".
6	15	"businesses should operate in and around KBAs" – but businesses already have guidelines for habitats including critical habitats, e.g. IFC PS6 & GN6 ... so how does this add to such existing guidance?	The criteria defining KBAs are not completely aligned with the IFC Critical Habitat criteria. Furthermore, the requirements expressed by IFC PF6 reflect the views of IFC and not necessarily of the KBA Partners.
6	70	"Biodiversity" – what is your definition of biodiversity? E.g. are ecosystems and ecological complexes components of biodiversity?	We refer to the CBD definition (see Executive Summary, first word).
6	81	"the global persistence of biodiversity" – what does this mean and is it quantifiable?	The definition in the KBA Standard adopted by IUCN Council of persistence is "Persistence of a biodiversity element means that its loss (e.g. species extinction, ecosystem collapse) or decline (e.g. of numbers of mature individuals of a species, ecosystem extent and condition) is avoided, both now and into the foreseeable future."

			A Global Standard for the Identification of Key Biodiversity Areas establishes a consultative, science-based process for KBA identification. It was developed in response to a request from IUCN Members, which called on the Union "to convene a worldwide consultative process to agree a methodology to enable countries to identify Key Biodiversity Areas". The IUCN SSC-WCPA Joint Task Force on Biodiversity and Protected Areas led a multi-year, global consultation process that mobilized input from experts in the IUCN Commissions, Members and Secretariat staff, other conservation organizations, academia, governments, donors and the private sector to consolidate the criteria and methodology for identifying KBAs. The global KBA Standard was adopted by IUCN Council and launched at the World Conservation Congress in 2016.
6	85	"globally agreed criteria for the identification of KBAs worldwide" – agreed under what international policy process? The CBD? KBAs do not feature in Agenda 2030 and the SDGs	
6	89	"Sites qualify as global KBAs if..." – how does this compare to and relate to the critical habitats criteria in IFC PS6?	It doesn't. The 2 standards (IFC PS6 and the KBA Standard) have different criteria and different goals.
6	95	"The KBA identification process..." – you may want to draft an outline for this introductory section and include sub-headings to help your reader	Section has now been completely redrafted. The new section on the KBA Standard and KBA identification process (Section 2 "More about KBAs") is now hopefully more clear.
6	105	"KBAs could potentially be managed as protected areas1 or by other effective means to conserve biodiversity" – this statement assumes that protected areas are effective when many are little more than 'paper parks.'	Section has been reworded (see Page 10, Key Biodiversity areas, protected areas, and conservation priorities.). However this document is not going to address management effectiveness as beyond scope.
6	112	"With regards to indigenous peoples..." again a clear outline with sub-headings is needed... why does this topic come up here or indeed at all?	Section has been restructured.
6	129	"Communities can also play a key role in monitoring KBA areas..." now not IPs but communities... again, jumping around a bit in the presentation	Section has been restructured.
6	144	"This survey highlighted a key question that needs an urgent answer "if a business's operations or supply chains are impacting a KBA, what is a business expected to do in order to manage responsibly their impacts on the identified biodiversity values?" – I can't see where this 'key question' is highlighted in the survey. Please provide the reference.	The section has been deleted.
6	206	"Offsets..." – why single out the last step of the biodiversity mitigation hierarchy rather than set out the hierarchy itself? Also, why refer to the IUCN policy rather than IFC PS6?	Offsets and their design are now only included in Guideline 5 which builds on the IUCN's Policy on Biodiversity Offset.
6	218	IBAT is not the only source of data. For example, see the Local Ecological Footprinting Tool	Noted. However in this document we are effectively directing people to the WDKBA specifically.
6	230	Definitions - You also need to define biodiversity, protected areas, ecosystems and sustainable use (used CBD definitions), conservation (best to use the IUCN definition in its World Conservation Strategy) and the concept of biodiversity persistence	We have expanded the Glossary to the terms used throughout the document that did not have a common understanding.
6	291	This is covered in IFC PS1. How does this section add value?	Correct. However the authors felt that it was wise to stress the importance of a number of Conditions for successful implementation * for the 15 Guidelines even if many of these have already been addressed by other standards (including but not exclusively by IFC Performance Standards).
6	303	This is the theme of IFC PS1 and is already in place. Again, not sure how these KBA guidelines add value.	Correct. However the authors felt that it was wise to stress the importance of a number of Conditions for successful implementation * for the 15 Guidelines even if many of these have already been addressed by other standards (including but not exclusively by IFC Performance Standards). With regards to the added value of the KBA Guidelines compared to IFC Performance Standard, it should be noted that the KBA Criteria and the Critical Habitat Criteria are somehow different. Furthermore, the conclusions reached by the KBA Partners on how to implement the mitigation hierarchy on projects and operations affecting the biodiversity elements which triggered the identification of a KBA are somehow different (see for example the limits to restoration and limits to offsets.).
6	Principle 1	No different than the habitats approach in PS6	It is different as the definition of Critical habitat/Natural habitat and KBAs are different.
6	Principle 2	"On the biodiversity elements, and the supporting ecological context" – elements of what and what context? Be clear about the components of biodiversity. Also 2 does not seem different from 1.	The "supporting ecological context" is now referenced in the Guideline 1 (Project biodiversity baseline) as the scope of the baseline study as considered still relevant for this first step in the implementation of the mitigation hierarchy. Furthermore, the structure of the document has been completely re-thought and the confusion between principle 1 and 2 addressed. Furthermore, the focus of the Guideline is now only the KBA elements that trigger the identification of the KBA.
6	Principle 3	Isn't this just articulating a mitigation strategy and action plan	Correct. Therefore the Principle has been dropped. The reference to eliminate, reduces and compensate is now made more clearly through the reference to the mitigation hierarchy (see page 13 of revised document)
6	Principle 4	This relates to the environmental assessment framework set out in PS1. What is the added value here?	The Principle and associated recommendations have been now restructured. Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured..."). Furthermore, Principle 4 Limits to impact restoration and Principle 5 Limits to biodiversity offsets also refer to "expert advice" and testing the effectiveness of the plans.
6	Principle 5	In the CBD definition of biodiversity, what you are talking about here is an 'ecological complex.' That's fine, but again this does not seem to add value to the guidance already available in IFC GN6.	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
6	Principle 6	Fine enough and relates to IFC PS7, but really an added topic here... should there then also be principles on poverty, youth and gender?	The Guidelines have a different scope than IFC Performance Standard and therefore the side by side comparison is not really relevant. In any case, as the potential conflicts between KBA goals and those of society are recognized by the KBA Partners, it was agreed not to treat this issue as a stand alone Guideline but to integrate it where relevant in the other Guidelines (such as in Guidelines 5 and 6).
7	182	but they are not standards they are a form of guidance, a roadmap, because there is a lot of potential for subjectivity and selectivity in the recommendations, especially on mitigation measures. Caution: when they get publicly announced, they will be binding to IUCN more than they are actually binding to businesses. Businesses would claim loss was unavoidable and they have the principles and recommendations to justify or judge use of other measures. You are equally addressing developing world where legal baselines for establishing businesses differ at national levels (standards?) In Lebanon they could be abused to justify irresponsible actions (like: here IUCN said if you cannot avoid then restore. I faced such a situation even from a government agency	Text has been modified and moved to Acknowledgment.

7	190	<p>I think you should put this in a separate paragraph and addressed to all businesses : there's always important opportunities for all businesses impacting and non-impacting to contribute to KBA conservation and improved management</p> <p>(this remains the right thing to do by all businesses.) some may be the most impacting and desire to contribute the maximum once engaged, and some might be the least impacting and do not wish to contribute.</p> <p>We should stand at equal distance from all businesses.</p>	<p>The reference to business potentially having a positive impact is now captured in Section 1 "Business and KBAs" separately from the section "Applicability" to avoid confusion.</p>
7	192	<p>it would be more comprehensible if you bullet list and group the different businesses/items . It could for example read as follows:</p> <p>The Principles and Recommendations apply to</p> <ul style="list-style-type: none"> - all businesses ... - all global and regional KBAs... - existing and new businesses - having direct - having no adverse 	<p>We opted for a narrative style. The section has however been redrafted.</p>
7	200	<p>as well as enacted laws on national level, and international law where applicable (seascapes) and signed international treaties.</p>	<p>Reference to the law is now captured in the Acknowledgments</p>
7	212	<p>"Whether or not is acceptable.." prefer to delete the highlighted it is not only about operation in site, but all relevant activities, if they send their waste to be dumped in nearing mountains and valleys, it is a concern and may in circumstances be illegal.</p>	<p>Reference to the law is now in the Acknowledgment. Specific reference to KBA designated as protected areas is now made in Section 3 under "Conditions for success".</p>
7	250	<p>how do we define gains and losses? and who defines them? and what are the red lines? It is important to provide full understanding for businesses to be able to act, otherwise it will be too superfluous and subject to (mis)interpretation.</p> <p>I don't know if there are red lines already defined? but as in following note and as we have experienced with CSC initiative, extinctions, EN, CR species and CR ecosystems necessitate immediate protection actions, not to be offset, not to be outweighed. Further loss cannot be and should not be accommodated.</p> <p>2m of EN population cannot be lost even if mountains of pine forest would be planted or preserved.</p> <p>I worked on the KBA profiles for Lebanon and on consultation with CEPF. Some sites are KBAs based on 2-3 species that are rare or threatened or of limited distribution. Some if they preserve more than 10% of populations of the above species . So even slight loss in the KBA defining species defies its status as KBA. If populations become less than 10%, we cannot consider it anymore. These could define the baseline/ minimum standards or red lines that we cannot accept any interference with let alone endangerment.</p>	<p>The discussion on offset is triggered by the discussion on "residual impact". This has been the focus of many hours of discussions among the KBA Partners. Hopefully Guideline 5 "Limits to Biodiversity Offsets" now reflect a good balance between the KBA conservation priority and the development needs.</p>
7	254	<p>I am also very critical about those definitions toward abuse of interpretation of unavoidable biodiversity loss to justify extinctions, and ill-concern with EN and CR species.</p> <p>I advocate reevaluation of these definitions or their employment (even if they are IUCN criteria) so as not to fall in the trap of our deeds; we are addressing businesses that are endangering species and habitats, so how would we flag the urgency of preservation of habitats of EN and CR species and ecosystems when we provide or consent to an excuse of loss.</p> <p>it may be difficult to avoid, but IUCN cannot state it, at least without major guidelines to what is acceptable or not. and IUCN cannot give a statement that would make it difficult for conservationists to fight diligently against loss of biodiversity, especially sensitive, rare, limited species and endemics.</p>	<p>This point is now addressed by Guideline 5 Limits to biodiversity offsets which is based on IUCN policies (Resolutions and Recommendations).</p>
7	279	<p>Footnote 7: and we do not accept justification of further or extended deterioration or adversely impacting activities on the assumption of future restoration.</p>	<p>Footnote has now been deleted. Reference to the challenges of restoration are now captured in Guideline 4 "Limits to impact restoration".</p>
7	Principle 1	<p>is it: no short or long-term negative impact(s) on any spacial or temporal scale, but ...</p>	<p>The Principle has been dropped.</p>
7	Principle 4	<p>this principle includes all projects existing and new, so scoping and assessment asap (not early) some impacts have taken place, and should include any measurable or non-measurable impacts (soil pollution, air pollution ...)</p>	<p>The Principle and associated recommendations have been now restructured. Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured..."). Furthermore, Principle 4 Limits to impact restoration and Principle 5 Limits to biodiversity offsets also refer to "expert advice" and testing the effectiveness of the plans.</p>
7	Principle 4	<p>only, but conservation implementation and management, and biodiversity monitoring and long-term impact monitoring would also need funds</p>	<p>Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").</p>
7	Rec 1.2	<p>where can be misleading</p>	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>
7	Rec 1.2	<p>delete additional</p>	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>
7	Rec 1.2	<p>In the last sentence: thus the project should not inflict any extinction pressures on sensitive biodiversity, avoidance should then be resorted to.</p>	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>
7	Rec 3.3	<p>no need to stress as much as possible (they would say it is impossible)</p>	<p>The structure and language has been completely revised.</p>

		<p>I am afraid we are adopting a lenient approach with the existing businesses although they are the ones that have already caused all the damage, and we are being stringent penalizing new businesses for the vices of old businesses.</p> <p>and it cannot be because now we are a conservation force and we know better. Surely we want to protect all and surely we want to stop further degradation urgently, but also we have to find a balance in the responsibility, accountability, equity, implementations, etc.</p> <p>Again, as we experienced with CSC initiative, old business will push to reduce measures and accountability on themselves. all of this work is advisory and might not be adopted by neither new nor old business, still we are the ones who are proposing and should advise a balanced approach.</p> <p>I believe impacting existing business should :</p> <ul style="list-style-type: none"> - conserve sites and eliminate further impact - monitoring is essential to see if conservation is helping natural regeneration and expansion of populations or restoration measures would assist better, and also to make sure that the residual effect of the impacting pressures is declining or other measures should be adopted to halt or reverse further degradation of the natural system and biodiversity. - ecological restoration can be administered based on archetypal ecosystems or referenced ecosystem and biodiversity. - offsetting is still a good tool, especially if the damage occurred, so we would be advancing the existing system. Offsetting can be acted not only on natural front but also on social and cultural level. <p>This is what comes to mind now, but surely there are other ways of engaging old business at providing back to natural systems, they are the ones who have gained and made benefits from or with the natural system.</p>	<p>This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines). In particular, recognizing that offsets in order to be successful need a baseline, their retroactive implementation was not considered realistic.</p>
7	Rec 3.4		
7	Rec 5.6	<p>it is not only employees, but the whole establishment.</p> <p>I suggest to state:</p> <p>The business creates awareness within their establishment on their undertaken engagements/commitments toward biodiversity and KBAs and establish an ethical code of conduct in order to prevent any further or individual or unforeseen impacts on one hand, and to assist in the attainment of the desired goals on the other hand (ex: if an employee sees fire, he/she should report it)</p> <p>As part of the mitigation plan, the business primarily prevents, if impossible then reduces, the impacts contributed by the supply chain (contractors, suppliers, unregulated parking,...). Awareness to engage such partners in the impact mitigation plan and engender their contribution is advisable.</p>	<p>The focus on integration of the Guidelines in the business responsible sourcing scheme is now stated at the beginning in the Applicability section.</p>
7	Rec 6.4		0 This issue has been now eliminated from the scope of the Guidelines.
7	Rec 6.5	<p>whereby indigenous people stand fully aware and clearly informed of the long term impacts of any decision; if there are impediments toward conscious expression of their decisions, independent moderator should be available.</p>	<p>This is a highly complex issue and for this reason a separate web based resource will provide links with reputable and specific guidance. However, the KBA partners decided to maintain the reference to obtain FPIC when indigenous peoples and local communities are impacted (in the section about "Conditions for successful implementation" and "Guideline 5).</p>
8	38	<p>Replace "could" with "should"</p>	<p>Style has completely changed due to lots of push back from intended users. As the document promotes the voluntary adoption of the Guidelines, we opted for a tone that wouldn't alienate the intended audience.</p>
8	40	<p>Insert at the end of the line "; to uphold international and national human rights obligations (incl. UNDRIP)"</p>	<p>This section has been deleted due to the changes in the structure. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).</p>
8	42	<p>Insert after stakeholders "and rights holders"</p>	<p>This section has been deleted due to the changes in the structure. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).</p>
8	53	<p>Insert after environmental "and social"</p>	<p>This section has been deleted due to the changes in the structure. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).</p>
8	54	<p>Insert after environmental "and social"</p>	<p>revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in</p>
8	54	<p>Insert after biodiversity " and human rights"</p>	<p>This section has been deleted due to the changes in the structure. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).</p>
8	61	<p>Insert after KBAs "and the supporting socio-cultural contexts"</p>	<p>This section has been deleted due to the changes in the structure. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).</p>
8	95	<p>In order to ensure that the KBA identification process is truly highly inclusive, consultative and bottom-up, we think that more guidance is needed to ensure that the identification of KBAs respects indigenous and local communities' rights, e.g. guidance on how to obtain Free Prior Informed Consent before entering communities' lands or carrying out biodiversity assessments. This will be the crucial first step to ensure an effective, fair and inclusive conservation of KBAs and their supporting socio-cultural contexts. We would be keen to explore this further with the KBA partnership.</p>	<p>This comment has been forwarded to the KBA partners as it is relevant to the KBA identification process and out of scope for these Guidelines.</p>

8	98	Insert after national level "and local level"	This section has been deleted as the KBA identification process is out of scope of these Guidelines and referencing it would only create confusion.
8	111	Insert after question "and needs to fully respect the rights of indigenous and local communities living in proximity and/or dependent on KBAs and their associated ecological and socio-cultural contexts."	This section has been deleted.
8	112	Suggest rephrasing to: "With regards to indigenous peoples and local communities, much of the world's biodiversity can be found on their lands and territories and has been and continues to be actively conserved by them. The loss of biodiversity has often disproportionately...."	The text has been now reworded and moved to Section 1 Business and KBAs (in paragraph "... and for people".)
8	128	Insert after last sentence: "For example, traditional knowledge can provide many contributions to ecological restoration, including through the construction of reference ecosystems (particularly when historical information is not available); input into species and site selection for restoration activities; knowledge of historical land management practices; input into management of invasive species, and post-restoration monitoring. A recent review of the applications of traditional knowledge in ecological restoration found that incorporating traditional knowledge not only contributes to strong partnership-building, but also increases the ecological viability of restoration projects, social acceptability and economic feasibility (see Uprety et al. 2012)."	The section has been re-written and included under "Conditions for successful implementation".
8	139	Insert after organisations "and indigenous peoples' organisations"	Section has been deleted
8	173	To ensure that these guidelines are aligned to best practices and fully consider and take into account the needs of other stakeholders living in proximity and/or dependent on KBAs and their associated ecological and socio-cultural values, we think the language on rights needs to be strengthened (see comments in the next section).	The KBA partners, after carefully reviewing comments received on this matter, decided to strengthen the focus of the Guidelines on conservation measures. Therefore, reference to the stakeholders and right holders is now the specific focus of Guideline 9 Participation and consultation; and it is fully integrated in Guideline 5 Limits to biodiversity offsets. The need to engage and involve right holders is also clearly stated as conditions for a successful implementation (page 11 and 12).
8	282	Insert after ecological "and socio-cultural contexts" Additional comment: We think that offsets should not be allowed for KBA trigger elements, as we are concerned that this will not challenge businesses to change inappropriate business operations.	After long discussions, the KBA Partners agreed that residual impacts on KBA triggered element(s) can be offset but only if specific conditions are met. These are now included in Guideline 5 (including the need to receive the free, prior and informed consent by local communities for both the project and the offset). It is understood that this is probably the most controversial point in the document and that it will be very unlikely that all stakeholders will agree with the proposed statement. It is also noted that these Guidelines should be considered as a minimum practice and that they will be regularly review (see Acknowledgment and About the KBA partners).
8	282	Add after ecological "and socio-cultural contexts"	The section has been deleted. The scope is now the KBA trigger elements.
8	282	We think that businesses should implement the mitigation hierarchy also in existing projects impacting current or newly identified KBAs. In these situations a certain timeframe could be given (e.g. one year) to bring business operations in line with the guidelines and recommendations. It would be good to define up to what point a KBA is considered "newly identified" as this will determine whether principle 1 or 3 should be followed, in the case of new projects/expansions in "more recent" KBAs.	Guideline 10 Responsibility for existing operations now captured the recommendations originally under principle 3. It does so by focusing on the promotion of additional conservation actions (rather than offsets for which there would be the need for a historic baseline) and clearly referring to the fact that all the guidelines operations and expansions starting the cut off date
8	282	In order to provide clear guidance on how to implement cross-cutting principles and practices, we suggest mainstreaming some of this language in the other principles (see comments in the next section).	Done. The cross cutting principles are now either embedded in a specific guideline or in the Conditions for successful implementation.
8	General	"Recommendations" should be replaced with "management conditions" as was in the previous version. Otherwise we are concerned that this standard will not challenge businesses to actually change inadequate business operations. In addition, a strong standard will give businesses clear guidance and if properly applied a solid basis for improving and showing the sustainability of their operations.	The comment is very valid. However it was considered along with comments that were calling for a much weaker approach. The Partners decided to change the wording to "Guidelines" but stick to a few but very clear and sharp measures that are considered essential in the context of projects and operations with impacts on KBAs.
8	Principle 1	Insert after ecological "and socio-cultural contexts"	The principle has been deleted. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Principle 2	Insert after ecological "and socio-cultural contexts"	The principle has been deleted. The revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Principle 4	6 on recommendations on FPIC). The business determines potential impacts against the socio-cultural baseline in which the business would operate in collaboration with local rights holders and experts, and drawing on best available science and Traditional Ecological Knowledge. Effective procedures are put in place and operationalised to: - Identify legal, customary or user rights - Identify areas important for the needs of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.) and areas of cultural significance and/or religious/sacred importance for the traditional cultures of local communities or indigenous peoples) . (NOTE FROM FPP: We think that this inclusion helps align HCV 5 and 6 with these guidelines) - Assess potential direct, indirect and cumulative impacts on rights holders and stakeholders These procedures are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions."	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Principle 4	Additional Rec: "Where indigenous peoples and local communities are affected by potential impacts or the implementation of these guidelines, the following applies: - The business will provide Affected Communities with access to relevant information in a culturally appropriate form and local language on: (i) the purpose, nature, and scale of the project, (ii) the duration of proposed activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism. - Where negative impacts on essential ecosystem services that Affected Communities depend on or impacts on social and cultural values of biodiversity considered to be unrestorable by rights holders are likely, the business should not proceed with project development. - Where residual impacts affect the rights of indigenous peoples and local communities, the design and implementation of remediation measures are carried out through an inclusive and effective multi-stakeholder consultation process, including representatives of indigenous peoples and local communities. The consultation process and results are documented and publicly disclosed. FPIC needs to be obtained when remediation measures affect the rights of indigenous and local communities (see Principle 6)."	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Principle 4	Additional Rec: "The design of remediation measures (restoration/offsets) draws on available traditional ecological knowledge. Where indigenous peoples and local communities live in or near KBA, their engagement in restoration and offset activities should be prioritised. This not only increases the likelihood of successful and socially acceptable remediation results but can also provide important socio-economic benefits to communities."	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).

8	Principle 5	Insert after approach "and human rights based approach" (building on IUCN 2012/099 calling for mainstreaming a rights-based approach to conservation)	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Principle 6	Add Rec: Business has an efficient process to identify, hear and resolve complaints, disputes, or grievances. A mutually agreed and documented Grievance Mechanism is established and operational, and resolves concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The business will inform Affected Communities about the mechanism in the course of the stakeholder engagement process or FPIC process.	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 1.1	Insert after first sentence: "The design and implementation of the mitigation hierarchy is carried out through an inclusive and effective multi-stakeholder consultation process, including representatives of indigenous peoples and local communities, where KBAs are located on or near indigenous peoples' and local communities' lands and territories. The consultation process and results are documented and publicly disclosed."	This element is now included as one of the Conditions for a successful implementation.
8	Rec 1.2	Line 3: Insert after advice ", traditional ecological knowledge" Line 3: insert after evidence "and consultations with rights holders and stakeholders" Line 4: insert after feasibility "social acceptability"	The Guidelines are now more focused on the conservation practices that businesses are recommended to adopt. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 1.4	We think offsets should not be allowed for foreseeable impacts on KBA trigger elements. Line 3: insert after stakeholder "and rights holder" We also suggest removing "where relevant" and replace it with a reference to Principle 6, as with the suggested changes below Principle 6 will clearly set out when FPIC needs to be obtained.	Regarding the additional wording focusing on rights holders: the Guidelines are now more focused on the conservation practices that businesses are recommended adopting. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5). Regarding offsets: the KBA Principles have considered all perspectives and recommended alignment to the IUCN Policy on Biodiversity Offsets including a strengthened list of limits to offsets.
8	Rec 1.4	"The design and implementation of offsets are carried out through an inclusive and effective multi-stakeholder consultation process, including representatives of indigenous peoples and local communities, where potential impacts and/or offsets affect indigenous peoples' and local communities' lands and territories. The consultation process and results are documented and publicly disclosed. FPIC needs to be obtained when offsets affect the rights of indigenous peoples and local communities (see Principle 6)."	The reference to obtain FPIC for the offset is now included in the Guideline 5 Limits to biodiversity offsets.
8	Rec 1.5	Line 1: Insert after ecological "and socio-cultural" Line 3: Insert after business operators "and indigenous peoples and local communities"	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 1.7	Insert after ecological "and socio-cultural contexts"	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 2.1	Insert after first sentence: "The design and implementation of the mitigation hierarchy is carried out through an inclusive and effective multi-stakeholder consultation process, including representatives of indigenous peoples and local communities, where KBAs are located on or near indigenous peoples' and local communities' lands and territories. The consultation process and results are documented and publicly disclosed."	This message is integrated now in one of the Conditions for successful implementation (pages 11-12)
8	Rec 2.4	Insert at the end of the sentence: "and their supporting ecological and socio-cultural contexts"	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 2.7	Line 3: We suggest removing "where relevant" and replace it with a reference to Principle 6, as with the suggested changes below Principle 6 will clearly set out when FPIC needs to be obtained. Insert additional sentence: "The design and implementation of offsets are carried out through an inclusive and effective multi-stakeholder consultation process, including representatives of indigenous peoples and local communities, where potential impacts and/or offsets affect indigenous peoples' and local communities' lands and territories. The consultation process and results are documented and publicly disclosed. FPIC needs to be obtained when offsets affect the rights of indigenous and local communities (see Principle 6)."	This message is integrated now in one of the Conditions for successful implementation (pages 11-12)
8	Rec 3.1	Insert at the end of the sentence "including an assessment of impacts on rights holders and stakeholders"	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 3.3	Insert at the end: "Where residual impacts affect the rights of indigenous peoples and local communities, the design and implementation of conservation actions are carried out through an inclusive and effective multi-stakeholder consultation process, including representatives of indigenous peoples and local communities. The consultation process and results are documented and publicly disclosed. FPIC needs to be obtained when conservation actions affect the rights of indigenous and local communities (see Principle 6)."	This point is now reflected in the Conditions for a successful implementation (pages 11-12)
8	Rec 3.4	Line 1: Insert after ecological "and socio-cultural" Line 3: Insert after business operators "and indigenous peoples and local communities"	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).

8	Rec 4.2	Insert after experts "including biodiversity experts from indigenous and local communities in or near a KBA".	The additional text has not been considered as the revised version of the Guidelines is now more focused on the conservation practices that businesses are recommended. Reference to the implications on stakeholders and right-holders are clearly made in the Conditions for successful implementation (page 11 and 12) and FPIC is now one of the conditions for proceeding with the project and the offset (see last point in Guideline 5).
8	Rec 5.1	Insert at the end of the line "including a participatory assessment of possible impacts on rights holders and stakeholders"	This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs. However, note that the Area of Influence definition has been adopted which refers also to "... impacts on different locations; ..indirect impacts on ecosystem services upon which the affected communities livelihoods are dependent".
8	Rec 5.2	Insert after seascape "and the wider socio-cultural contexts" (see also suggested additional recommendations under Principle 4)	This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
8	Rec 5.3	Insert additional sentences: "Where indigenous peoples and local communities are affected by potential impacts or the implementation of these guidelines, an inclusive and effective multi-stakeholder consultation process is carried out, including representatives of indigenous peoples and local communities. The consultation process and results are documented and publicly disclosed. FPIC needs to be obtained when the rights of indigenous and local communities are affected (see Principle 6)."	FPIC is now a conditions for proceeding with the project and offset (see Guideline 5)
8	Rec 5.4	Add the following: "Where KBAs are located on or near indigenous peoples' and local communities' territories and lands, businesses consult with communities to assess options for managing KBAs as indigenous peoples' and community conserved territories and areas (ICCAs) or through co-management arrangements, or other means and processes that empower communities ." (In line with IUCN 2012/092 (Promoting and supporting community resource management and conservation as a foundation for sustainable development), IUCN 2012/093 (Prioritising community based natural resource management for social and ecological resilience) and IUCN 2012/094 (Respecting, recognising and supporting Indigenous Peoples' and Community Conserved Territories and Areas))	Noting that businesses will not be in charge of managing KBAs as such but managing their projects and operations, FPIC is now a conditions for proceeding with the project and offset (see Guideline 5)
8	Rec 5.5	Insert at the end of the sentence: "and provide immediate and adequate support to Affected Communities."	This Recommendation has been deleted and not replaced by any Guideline as it would be now be part of the risks to biodiversity that the company has to assess and manage which are dealt with all the Guidelines.
8	Rec 5.6	Add: "and associated facilities."	The Recommendation has been deleted. The scope of the Guideline is stated at the beginning of section 3 and includes associated facilities (as per the definition of Area of Impact).
8	Rec 6.2	Remove "where appropriate and possible"	This recommendation has been deleted as considered out of scope for these Guidelines.
8	Rec 6.3	Insert after mitigation hierarchy "or to achieve the biodiversity conservation objectives"	This recommendation has been deleted. The requirement to obtain FPIC somehow replaces it.
8	Rec 6.5	Suggested rephrasing: "For new projects impacting KBAs or their supporting ecological context that indigenous peoples or local communities have customary rights to, use of or depend on, Free Prior Informed Consent must be obtained. The business develops and implements an FPIC plan and conducts a socio-cultural and land tenure assessment to assess possible consequences for local communities resulting from possible changes of the status of land, territories and resources and to identify i.a. community stakeholders, landowners and users in the project area; customary laws, informal rules and organizing practices, and claims on land ownership, occupation and use; types of livelihoods and resources communities depend on; institutions, governance systems and decision-making roles. The FPIC process follows recognised best practices and the business' FPIC plan and results of the socio-cultural and land tenure assessments are published." (NOTE: Reference material for conducting an FPIC process are: IFAD (2015) How to do. Seeking free, prior and informed consent in IFAD investment projects RSPO (2015) Free, Prior and Informed Consent Guide for RSPO members)	The focus of the revised Guidelines is now much strongly on the conservation measures that business can adopt. This said, the KBA partners strengthened the reference to obtain FPIC when indigenous peoples and local communities are impacts (in the section about "Conditions for successful implementation" and "Guideline 5)).
8	Rec 6.6	Suggested rephrasing of this principle: "Where indigenous peoples or local communities have rights in the KBAs or their supporting socio-cultural and ecological context, they are compensated for any relinquishment of rights, subject to FPIC and negotiated agreements. Compensations need to be negotiated with representatives of Affected Communities and are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions."	This specific requirement has not been included in the revised Guidelines.
8	Rec 6.7	Add after existing projects: "(including current portfolio and new acquisitions)" Add after indigenous peoples "or local communities" Add at the end of the sentence: "with the objective of securing the consent of rights holders and stakeholders to the continued business activities."	This recommendation is now more clearly expressed under Guideline 5 Limits to Biodiversity Offsets ("The development and offset should both have obtained the free, prior and informed consent of any impacted local communities").
8	Rec 6.8	Insert at the end of the sentence: "including consulting with communities to assess options for managing KBAs as indigenous peoples' and community conserved territories and areas (ICCAs) or through co-management arrangements, or other means and processes that empower communities ." (NOTE: In line with IUCN 2012/092 (Promoting and supporting community resource management and conservation as a foundation for sustainable development), IUCN 2012/093 (Prioritising community based natural resource management for social and ecological resilience) and IUCN 2012/094 (Respecting, recognising and supporting Indigenous Peoples' and Community Conserved Territories and Areas)	This recommendation was considered too vague. It has now been replaced with a more detailed text under "Conditions for a successful implementation".
9	103	The concept of KBAs has been introduced to the HCV Technical Working Group, which is developing HCV Guidelines for FSC. The working group will consider treating the confirmed KBA sites as Best Available Information. Maps of KBAs would help the standard developers particularly in countries, where there is only limited expertise of biodiversity.	We will follow up directly with the HCV group to discuss how to best integrate HCV and KBA identification criteria and how to access the biodiversity information associated to each KBA.
9	Principle 6	If KBAs are considered HCV1, FSC does not allow any conversion happening in those sites.	The point was noted. However the KBA Partners feel that they found a good compromise now between the Guideline 2 focusing on Avoidance (which also defines the no go situations and Guideline 5 limits of biodiversity offsets which define very specifically at which conditions offsets can go ahead.
9	Rec 6.4	We suggest the compensation of the lost livelihoods has to be proportionate to the economic gain the company generates by using the KBAs. For that purpose, the annual turnover of the company has to be publicly available.	This issue has been now eliminated from the scope of the Guidelines.
10	15	The use of word 'should' is more of a regulation than a recommendation	The language and style has been completely revisited (to avoid command style language or prescriptive content).
10	75	The classical debate between conservation and preservation, it would be better if instead of preserve one could write protect and conserve	Text has been modified.
10	107	This is an ambiguous statement, if the number of KBA's are not defined then how could the protected area be defined as 1/5th of the total	The values (see section 2) are based on information available at the time of publication.

			Section has been deleted. However note that Section 3 "Guidelines for business activities" and specifically section "Applicability" states "The Guidelines can also be integrated into responsible sourcing policies for goods and services, the production of which could have direct, indirect and cumulative impacts on KBAs".
10	145	Recommendation to use value chain instead of supply chain	
10	260	As CBD is part of the larger UNEP umbrella, please check whether UN CBD is the right abbreviation? We usually write only the convention on biological diversity...	Text has been deleted.
11	Principle 1	In effect, this principle requires no net loss, and preferably a net benefit, to all ecological aspects of a site where a project is proposed within a KBA. We are not sure if this was an intentional shift from PS6 which required a net benefit on the triggers of critical habitat plus their "supporting ecological processes," but as worded in the Principles, "supporting ecological context" is more comprehensive and in our experience, will exceed the practical ability of corporations and conservationists alike to characterize, manage, and monitor in a defensible manner something so broadly described. Furthermore, whether focusing on KBA triggers alone or their ecological contexts, by restricting the use of offsets, it is improbable that any project with a physical footprint in natural habitat could achieve no net loss in a reasonable timeframe, or a net benefit ever (as explained below). Therefore, this principle is effectively a prohibition of any new development with a physical footprint in natural habitat within a KBA.	The implementation (including the scope of the benefits) of the offsets is now aligned with the IUCN Policy on biodiversity offsets.
11	Principle 2	This principle, in its entirety, appears to be redundant of Principle 1 which already includes "supporting ecological context."	The structure of the document has been completely re-thought and the confusion between principle 1 and 2 addressed. Furthermore, the focus of the Guideline is now only the KBA elements that trigger the identification of the KBA.
11	Principle 3	As written, the scope of this Principle will be too large for most companies to accept. Furthermore, as stated above, the scope is expanding as the KBA network is defined. In our experience, it is very challenging to perform post-hoc impact assessments on projects that pre-date contemporary standards for ESIA. Therefore, on a practical basis, this principle can be very difficult to implement. A more practical and palatable alternative might read: No additional loss of KBA triggers as a result of business activities. Seek to enhance the long-term viability of KBA triggers and their supporting ecological context in accordance with regional conservation goals and long-term land use plans.	Principle 3 and associated Recommendations have been replaced by Guideline 10 Responsibility for existing operations which refers to "...operations started before the identification of the KBA or before these guidelines were issued". Furthermore, the Guideline clearly states that impacts generated by extensions or future operations are addressed by the other Guidelines.
11	Principle 6	The principle itself is reasonable. However, there are complexities that are not recognized in the recommendations. In particular, for recommendations 6.3 & 6.6, one cannot assume that local communities' interests are aligned with conserving the KBA. This may be true in some contexts, but not in all. Indeed, in many contexts the need for conservation is due to land uses such as agriculture or informal mining that have severe negative impacts on biodiversity. Where this is the case, conservation actions such as protection of company restored areas and offsets may rely on significant alterations in land use practices. Doing so may well be a shared responsibility with government and is more complex in implementation than the recommendation implies.	The potential conflicts between KBA goals and those of society are recognized by the KBA Partners. However, the need to respect the right of communities and indigenous peoples remains an important part of the process. It was agreed not to treat this issue as a stand alone Guideline but to integrate it where relevant in the other Guidelines (such as in Guidelines 5 and 6).
11	Rec 1.1	IUCN does not have capacity to address uncertainties or errors KBAs are not supported by an institutional structure with the capacity to respond to issues raised by those attempting to comply with the corporate principles. When a corporation confronts an uncertainty or error with a KBA designation that may have material impacts on its business, IUCN is not equipped to respond and resolve the issue in a timely and effective manner. The KBA Standard indicates there will be an 8 to 12-year re-assessment schedule for KBA delineation. Will companies be required to lead re-assessments of KBAs, when needed? This is already a serious problem with the Red List. Restrictions may not reflect actual risk Mitigation is not usefully dictated a priori of impact and risk assessment. Although not addressing the issue of business impact assessment directly, the Principles document does acknowledge that the management of biodiversity should be determined on a case by case basis. While identification of a KBA is recognition of a site's biodiversity significance, it does not, on its own, imply any one specific management response; which will differ depending on the needs of the biodiversity in question. [p. 7] For a corporation, the primary implication is that restrictions on development and offsetting within KBAs may be too conservative and result in unnecessary financial impacts. This is readily understood when imagining a project in a >1 million ha KBA in the Amazon designated to support a VU species. Boundaries may not reflect actual risk The boundaries of KBAs are determined by both scientific and management considerations (i.e. boundaries conducive to management). A KBA may sometimes be smaller than the area of continuous habitat supporting a trigger (for example, this habitat covers a protected area and also habitat outside, but for reasons of manageability, only the PA portion is designated as a KBA). Or, the KBA may be larger than the area in which the trigger occurs, e.g. where this is entirely within a larger PA or some other management boundary, which for convenience is designated as the KBA. This could have material implications for projects and biodiversity at the ground level. KBA identification is incomplete KBA designation is in an early stage. At present, we do not yet know how geographically expansive the full set of KBAs will be, and the methods in the KBA Standard suggest some could be extremely large (i.e., millions of hectares). We expect that many corporations will hesitate to sign on to commitments of unknown scope.	This comment refers to a number of processes relevant to the KBA partnership (namely identification, delineation, monitoring of KBAs). These comments have been shared with the KBA Partners and considered in the revision of this document. However this document is not going to offer a response to these concerns. With regards to the comment about the need to adopt a "risk based approach", the revisions made to the document, and in particular the focus on "Limits of Offsets" (rather than focusing on when offsets are possible) does address partially the concerns.
11	Rec 1.2	(applies also to 1.3) The emphasis on site restoration (to the de facto exclusion of offsets) caters to projects with temporary footprints and does not provide constructive options for development with more permanent impacts (e.g. open pit mining, infrastructure). In the cases where footprints are temporary, the time required to achieve ecological equivalence via site restoration alone will be at least decades, if not centuries in some settings. This raises the obvious problem that temporal loss will preclude the achievement of no net loss. And even if temporal loss were to be ignored, complete restoration to pre-project status could only achieve no net loss in the best-case scenario – never a net gain More realistically, a project developer could be expected to provide evidence that restoration is on the correct restoration trajectory within a reasonable timeframe (e.g., 10 years) after project closure (if it is a project that closes) – but not to achieve pre-project ecological equivalence at the site. In this scenario, offsets are still required to achieve no net loss or net gain. Finally, Recommendation 1.3 (inadvertently?) restates the goal as "maintenance of the KBA triggers," which is much more lenient than what is stated in the Principle.	Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation" has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.
11	Rec 1.4	for PS6. However, this has proven not to be of great practical use. Rarely is a no-go decision a realistic alternative and PS6-compliant projects have figured out how to use offsets to generate net gains in these contexts.	number of situations (the limits) occur.
11	Rec 1.9	The appropriate legal approach for ensuring that biodiversity commitments attach to a project is not the contract between the buyer and seller of the asset. There are other ways to ensure that mitigation commitments pass from one project owner to the next, such as ensuring they are in the project's environmental permit. The agreements/commitments should be with government and attach to the asset, and therefore transfer with ownership.	The Recommendation is now captured with different wording in Guideline 8 Responsibilities in case of divestment (reference to contractual obligations has been dropped).
12	34	Perhaps more can be done to liken KBAs to other important areas of biodiversity (e.g. protected areas and threatened species), which are currently subject to more national and sub-national regulation and guidance from financial institutions (e.g. Equator principles) and reporting standards (e.g., GRI biodiversity indicators). This may help make KBAs a less foreign concept to businesses (as suggested above, by linking the guiding principles with WCC 2016 Rec 102.	A new paragraph "KBAs, protected areas and conservation priorities" aims at doing this.

12	76	<p>Not all KBA values are known with precision (as acknowledged in the KBA standard - where uncertainty is discussed). Sometimes there is great uncertainty in biodiversity data available, or in expert judgement provided about the occurrence of threatened species or habitats. Or the data / judgements are out of date.</p> <p>Is there provision for businesses / regulators to verify the validity of a KBA value being truly located within a location?</p> <p>This could involve strict monitoring and evaluation processes to validate or demonstrate with certainty that KBA values do or don't exist in the area flagged for development.</p> <p>This could provide the feedback loop back into the KBA process - to update and refine biodiversity information spatially.</p>	<p>This is an important point which is being dealt with through the KBA Partnership. Reference to the appeal process is made in the web based resources (see http://www.keybiodiversityareas.org/kba-partnership/kba-standards-and-appeals-committee)</p>
12	101	<p>In line with the comment above, is there a process in place to source data from businesses to feed private company biodiversity data into the process of establishing new KBAs?</p> <p>A number of businesses can hold a great deal of relevant biodiversity data that could help inform the validity of KBAs already in place or help establish new KBAs (as discussed in relation to the Global Biodiversity Information Facility; GBIF 2015; King et al., 2012).</p> <p>GBIF. (2015) Statement of Principles: On Sharing Biodiversity Data from Environmental Impact Assessments (EIAs). Global Biodiversity Information Facility.</p> <p>King N., Rajvanshi A., Willoughby S. et al. (2012) Improving access to biodiversity data for, and from, EIAs—a data publishing framework built to global standards. Impact Assessment and Project Appraisal 30, 148-156.</p>	<p>The KBA partners will set up a process for enabling the sharing of private sector data. For now, we have highlighted this principle in a Guideline (See Guideline 14 "Sharing biodiversity data").</p>
12	178	<p>We acknowledge that these can only be guiding principles that promote voluntary adoption by regulators, lenders and business operators. Given the non-legal nature of these principles, we therefore believe a much clearer / aspirational conservation stance should be put forward about what KBA elements should trigger the avoidance step of the mitigation hierarchy (and prevent development from occurring in a KBA). This reflects the points made in the IUCN motion, now WCC 2016 Rec 102, for guiding industrial activities and infrastructure development in and around protected areas and other areas important for biodiversity (surely this should be referred to somewhere in the guiding principles?).</p>	<p>This has now been captured by placing a much stronger focus on avoidance and minimization (see Guidelines 2 and 3) and strongly referencing the limits to restoration and offset (Guidelines 4 and 5).</p>
12	206	<p>We believe the full mitigation hierarchy should be outlined prior to discussing offsets in the second bullet point of the Implementation section. Because really what these guiding principles steps are advocating are the avoid and minimise steps of the mitigation hierarchy over the more uncertain restore and offset.</p>	<p>This has been done.</p>
12	257	<p>Interesting definition of the mitigation hierarchy. The statement of "managing biodiversity risk" could be mis-interpreted by businesses that often talk about biodiversity risks – as risks posed to the business (not to biodiversity). Really the mitigation hierarchy is about managing biodiversity "impacts".</p> <p>How about this definition: "A commonly applied participatory framework used to guide development at the project level, in order to prevent negative environmental impacts where possible and remedy them where adverse impacts are unavoidable (BBOP, 2012). By following the steps of the mitigation hierarchy, potential biodiversity impacts on projects subject to a NNL or NPI objective, should first be avoided through design, minimized in implementation, remediated where possible, and any residual impacts compensated for via offsets (Bull et al, 2016).</p> <p>BBOP, 2012. Standard on Biodiversity Offsets. Business and Biodiversity Offsets Programme, Washington DC.</p> <p>Bull, J.W., Gordon, A., Watson, J.E.M., Maron, M., 2016. Seeking convergence on the key concepts in 'no net loss' policy. J. Appl. Ecol. 53.6, 1686-1693.</p>	<p>The definition has now been changed (and it's now based on the widely accepted BBOP (2012) definition).</p>
12	260	<p>Remove "measures" from "The mitigation hierarchy is the following logical framework for biodiversity management measures"</p>	<p>The definition has now been changed (and it's now based on the widely accepted BBOP (2012) definition).</p>
12	278	<p>"Additional Conservation Action" - An odd point to make at the end of the mitigation hierarchy. We suggest this be made into a separate point (if at all). What does this even mean? This alludes to the difficulty with biodiversity measurement, prediction and evaluation, which should be discussed somewhere?</p>	<p>ACA are not mentioned anymore as part of the mitigation hierarchy (now only defined in the Glossary).</p>
12	General	<p>We fully support the IUCN in preparing these guiding principles for businesses and regulators to understand more about Key Biodiversity Areas and the conservation communities' expectation about the types of activities that should be avoided in and around KBAs.</p> <p>However, we believe these standards lack clarity - particularly differentiation between the different principles. We hope that the principles could be transformed to provide a really clear set of steps that relate to how the mitigation hierarchy could be applied to help businesses determine how they should operate in or near KBAs.</p>	<p>The document has been entirely restructured due to this and many other similar comments. The Principles and Recommendations have now been replaced by 15 focused Guidelines.</p>
12	Principle 1	<p>We believe these recommendations aren't clear enough in differentiating between the different steps of the mitigation hierarchy for different combinations of developments & KBA elements impacted. e.g., we suggest for Principle 1:</p> <p>1: New projects or expansions that trigger (i.e., are predicted to directly impact) the elements used to justify the establishment of the KBA, should be avoided in the first instance. Or impacts minimised by considering project relocation.</p> <p>If developers wish to contest the occurrence of the KBA value in a project location, then they should invest in biodiversity monitoring to establish a burden of proof to demonstrate this (see our point earlier in relation to line 76). This information could feed back into the KBA process to refine uncertainty associated with some KBA values.</p> <p>If Avoid is associated with Principle 1 then the intended conservation outcome would simply be NNL. We think it is very dangerous recommending that Net Gain objective be applied to KBA biodiversity values.</p>	<p>The structure of the document has been completely changed. In particular the Principles and Recommendations have now been replaced by 15 Guidelines which are measures to adopt in addition to the mitigation hierarchy.</p>
12	Principle 6	<p>How will the affected people/ stakeholders/ Right holders be identified – through a stakeholder analysis? More guidance should be given to help encourage best practice stakeholder engagement.</p>	<p>The Principle has been dropped. The potential conflicts between KBA goals and those of society are recognized by the KBA Partners. However, the need to respect the right of communities and indigenous peoples remains an important part of the process. It was agreed not to treat this issue as a stand alone Guideline but to integrate it where relevant in the other Guidelines (such as in Guidelines 5 and 6).</p>
12	Rec 1.2	<p>Clarify what recommendations relate to different steps of the mitigation hierarchy, e.g. "The business applies all possible avoidance measures (including not proceeding with a project development where it is likely that negative impacts on the biodiversity elements triggering the identification of the KBA will occur (AVOID step), and relocating the project in other sites, prioritizing, where relevant, already degraded areas (MINIMISE step)."</p>	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>
12	Rec 1.2	<p>"Empirical expert advice" – Do the IUCN have a position statement on how to elicit empirical expert advice? If so, it should be cited to explain what you mean by "empirical", because expert advice (no matter how "empirical") can be biased and subjective compared to empirical data (e.g., monitoring or research). A definition (or citation) should be provided to explain what you mean here.</p> <p>Structured expert elicitation methods are covered by Martin et al (2012) and Speirs-Bridge et al (2010), and should be incorporated into any expert driven process.</p> <p>Martin, T.G., Burgman, M.A., Fidler, F., Kuhnert, P.M., Low-Choy, S., McBride, M., Mengersen, K., 2012. Eliciting expert knowledge in conservation science. Conserv. Biol. 26, 29–38.</p> <p>Speirs-Bridge, A., Fidler, F., McBride, M., Flander, L., Cumming, G., Burgman, M., 2010. Reducing overconfidence in the interval judgments of experts. Risk Anal. 30, 512–523</p>	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>

12	Rec 1.2	<p>Surely restoration of KBA values should not be encouraged (particularly when these are threatened species or ecosystems)? As restoration allows for a very long time delays in achievement NNL or NPI objectives, and there are very mixed success rates of restoration projects in marine and terrestrial environments (Bayraktarov et al 2015; Maron et al 2012; Suding 2011).</p> <p>This is why we think it is important to list all KBA criteria, and align these with appropriate steps of the mitigation hierarchy and plausible conservation objectives (e.g., NNL or NG).</p> <p>Bayraktarov, E., Saunders, M.I., Abdullah, S., Mills, M., Beher, J., Possingham, H.P., Mumby, P.J., Lovelock, C.E., 2015. The cost and feasibility of marine coastal restoration. <i>Ecol. Appl.</i> 26, 1055-1074.</p> <p>Maron, M., Hobbs, R.J., Moilanen, A., Matthews, J.W., Christie, K., Gardner, T.A., Keith, D.A., Lindenmayer, D.B., McAlpine, C.A., 2012. Faustian bargains? Restoration realities in the context of biodiversity offset policies. <i>Biological Conservation</i> 155, 141-148.</p> <p>Suding, K.N., 2011. Toward an era of restoration in ecology: successes, failures, and opportunities ahead. <i>Annual Review of Ecology, Evolution, and Systematics</i> 42, 465-487.</p>	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation" has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>
12	Rec 1.7	<p>Do the KBA consultation groups recommend a static baseline over other alternatives? If so, this should be made clear as there are alternatives to using a 'static baseline', like a dynamic baseline or counterfactuals, which will influence how easily an objective (e.g., NNL or NG) can be achieved (Bull et al., 2014).</p> <p>Bull, J.W., Gordon, A., Law, E.A., Suttle, K.B., Milner-Gulland, E.J., 2014. Importance of baseline specification in evaluating conservation interventions and achieving no net loss of biodiversity. <i>Conserv. Biol.</i> 28, 799-809.</p>	<p>This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".</p>
13	24	<p>"The Principles and Recommendations apply to all businesses..." what about governments as implementers of large infrastructure projects? e.g. roads, dams etc.</p>	<p>They would also apply to them.</p>
13	52	<p>Appreciate the intent is to provide additional safeguards and best practice guidance but more classifications and principles require additional administrative burden and process that takes time and money away from on-the-ground conservation gains. How do we prevent this from becoming another layer of administration in addition to other standards like PS6?</p>	<p>That was not the intent of the Guidelines. In their revised format, the 15 Guidelines can be easily understood as a set of practices that can be integrated in other standards and not being a stand alone standard itself.</p>
13	76	<p>"Knowing, with precision, the location of those places that contribute significantly to the global persistence of biodiversity is therefore critical information..."</p> <p>Precise and accurate data is critical for identification and appropriate management of KBAs. However, the KBA database consists of data contributed by a variety of entities over time, and as such there can be a lack of consistency, out-dated and inaccurate data used in the identification and delineation of different types of KBAs.</p> <p>For example, one KBA assessed through IBAT covered the majority of a metropolitan area. How do the principles relate to development within this area and the existing impacts from human habitation, not just development projects?</p> <p>If, as the principles infer, businesses are expected to make costly biodiversity management decisions based on variable and uncertain data, there is a risk that the whole value of the KBA approach will be undermined.</p>	<p>The KBA Partners are aware of the challenges posed by the quality of the data (and in certain cases lack of quality). However the fact that the data is not always perfect should not stop from implementing best practices measures to ensure that the KBA values are maintained.</p>
13	105	<p>What is the potential for the number of KBAs to be expanded in the future? Particularly as businesses explore and develop projects and baseline studies in remote areas. If PS6 critical habitat is encountered does this imply that the area should be a KBA? What happens when project development occurs in parallel with KBA classification?</p>	<p>These are questions that the KBA partners are addressing in the context of the implementation of the KBA Standard.</p>
13	186	<p>Concern regarding impact for existing operations: Operations which have been approved under old legislation may only be viable by allowing some level of disturbance to a KBA. This extra layer of restrictions is concerning for older developments, for example what about a KBA occurring in an existing city? To say that no impact will arise is not a realistic assumption, there is always a trade-off.</p>	<p>Refer to comments related to old Principle 3.</p>
13	193	<p>"...to the entire life-cycle of the operation, from pre-feasibility to closure" - This should be extended to post closure. In perpetuity agreements would ensure the area will maintain its status, and not be re-developed.</p>	<p>This element will be addressed as part of the restoration and offset plans (Guidelines 4 and 5)</p>
13	194	<p>Footnote 2: Several reviewers have said they cannot make out the intent of this footnote, please rewrite for clarity. Suggest a full definition of local, regional and national KBAs and what is and is not covered by the guideline.</p>	<p>The footnote has been deleted.</p>
13	194	<p>Footnote 3: "Associated facilities" Does this cater, for example, for a pipeline or powerline infrastructure that remains post development?</p>	<p>The Aol will be implemented according to IFC Standard.</p>
13	200	<p>The statement seems to infer that negative impact on a KBA could be permissible if consent is given by the local community. Is this intended? For example, if an operation contributed significant economic and/or alternative socioeconomic benefits which the community valued more than the biodiversity value, then the KBA could legitimately be impacted?</p>	<p>The paragraph has been revised and hopefully the intent is more clear (which is not what the reviewer refers to).</p>
13	216	<p>If the KBA database is not freely available, access to information will inhibit smaller, potentially high-impact businesses from adopting these principles – for example small-scale agriculture. How is the KBA Partnership differentiating between commercial and non-commercial applications of the dataset? For examples if a community of small-scale farmers operates as a collective is this considered commercial? Concern here is that if information is not freely available it may be that only larger corporations buy in and smaller groups are not able to implement them through lack of info.</p>	<p>This comment has been shared with the IBAT Partners which were in the process of revising the fee structure.</p>
13	222	<p>Business should be supporting good governance but in the absence of adequate legal protection or sufficient funding, business can be perceived as the new colonialism. Also potential for human rights conflict are a concern. We have to be careful that the expectations on the role of business does not involve becoming a quasi-government.</p>	<p>This sentence has been deleted.</p>
13	226	<p>While new areas may be defined as KBAs in the future, is there a mechanism for challenging a designation if it is founded on old or inaccurate data? The absence of contemporary, accurate data could potentially lead to inaccurate management of areas by companies, NGOs, and governments.</p> <p>For example: The spotted ground-thrush (<i>Zoothera guttata</i>) is listed as Endangered by IUCN based upon an assessment and data from BirdLife International. The only record for this species in DR Congo is a single specimen observed in Upemba National Park in 1973. The current BirdLife International distribution map illustrates the locality for this specimen incorrectly, as south of Kolwezi, which is >100 km south of Upemba National Park which does not contain suitable thick forest habitat which the species requires. During development of the biodiversity action plan, this species triggered PS6 Critical Habitat for Project X due to the proximity of said project to Kolwezi, when in reality the species is >100 km from Project X</p>	<p>The KBA Partners have established a Standard and Appeal Committee which can address questions related to the accuracy of data: http://www.keybiodiversityareas.org/kba-partnership/kba-standards-and-appeals-committee</p>
13	257	<p>Would be interesting to expand the thinking on the mitigation hierarchy and the influence this will have on the KBA principles. The current hierarchy does not actually force an alternative approach to the engineered aspects of human development. For example, the current hierarchy makes development projects change horizontally (footprint size, restoration, offsetting aspects which are too hard to avoid) and does not actually change the nature (vertical) of the development itself by pushing funding towards technology/engineering innovations which could provide additionality and closed loops cycles within the critical ecosystem services of the KBA which may be impacted.</p>	<p>Interesting suggestion. However it was felt that at this stage the mitigation hierarchy provides a good starting point to anchor the new proposed guidelines. This suggestion is also valid beyond KBA and probably beyond biodiversity conservation. Worth investing some thinking!</p>

13	Criterion 6.2	The business cannot "enhance sustainable socio-economic benefits" but the business can facilitate the development of sustainable socio-economic benefits that encourage conservation as a land-use and improve the sustainability of other land use types by landowners	The reference to support to conservation of biodiversity is now captured in Guideline 12 (Additional conservation actions) and Guideline 13 (KBAs as targets for offsetting impacts elsewhere) which include reference to the need to make choices that are socially acceptable. Furthermore, recognizing the fact that business can not "enhance socio-economic benefit" but provide these benefits when leading restoration activities, a specific point in the "Conditions for a successful implementation" mentions that "...restoration and offset activities can provide important socio-economic benefits to communities".
13	Goal	Suggest 'and' instead of 'or'	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
13	Principle 1	"Business causes no long term negative impact" – Change business to 'the development'. It's not business that causes the impact but the development. The language used places business in a negative position from the outset "supporting ecological context" is more comprehensive than PS6 which requires a net benefit on the triggers of critical habitat plus their "supporting ecological processes" This additional term/definition will likely make it very difficult for business and conservationists alike to characterize, manage, and monitor in a defensible manner something so broadly described. By restricting the use of offsets, it is unlikely that any project with a physical footprint in natural habitat could achieve no net loss in a reasonable timeframe, or a net benefit. Therefore, this principle is effectively a prohibition of any new development with a physical footprint in natural habitat within a KBA.	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive. Therefore Principle 1 has been deleted. The "supporting ecological context" is now referenced in the Guideline 1 (Project biodiversity baseline) as the scope of the baseline study as considered still relevant for this first step in the implementation of the mitigation hierarchy.
13	Principle 3	The entire principle is problematic for existing operations, particularly for newly declared KBAs. Activities related to eliminating, reducing and compensating for residual impacts will not be in the operating budgets and profit & loss sheets of existing operations. Conducting targeted assessments and identifying opportunities to prevent future loss would be relevant. Voluntary enhancement and conservation actions also seem important but compulsory compensation makes this the superfund-style regulation The emphasis on "Business eliminates" also has shortfalls: for existing operations this will be difficult to implement without regulatory intervention. The intention is clear but it might be better to encourage efforts to minimise and mitigate. To prescribe elimination of economic activities is unrealistic. Scope is simply too large and growing as the KBA database expands making this unfeasible to implement. Suggest replacing with: "No additional loss of KBA triggers as a result of business activities. Seek to enhance the long-term viability of KBA triggers and their supporting ecological context in accordance with regional conservation goals and long-term land use plans."	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
13	Principle 4	Suggest "sets aside funds" is replaced with "disclose funding requirements" Placing funds in a trust will not work for each and every project, and particularly in developing countries where governance and institutional capacity are weak – in these cases funds are often more likely to be made available for restoration if they remain in the hands of the company/developer.	Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").
13	Principle 5	Support the concept of landscape/watershed approaches in assessment although note these are over and above those required by PS6. However, the management of risks at these scales requires other stakeholders and can be outside of the control of the business.	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
13	Rec 2.7	What is meant by 'broad stakeholder agreement'? - quite vague.	This recommendation is now replaced by Guideline 5. The specific reference to "broad stakeholder agreement" has been replaced by "The development and offset should both have obtained the free, prior and informed consent of any impacted local communities", making it hopefully more precise in defining where consent should be sought.
13	Rec 1.10	"The business... effectively anticipates, learns from, and responds to change" – this recommendation appears to support a dynamic baseline – see comments on recommendation 1.7 above Change should also include political/regulatory changes	In Guideline 1 (Project biodiversity baseline), "static" has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
13	Rec 1.10	Seems redundant in light of Principle 1 which already includes "supporting ecological context."	This recommendation has now been removed.
13	Rec 1.2	"...demonstration of restoration potential before project activities commence..." Restoration potential has such variability in time frames that this recommendation could potentially mean a long and onerous process depending on the level of certainty required (>10 years). It is doubtful that there will be examples and or data available to demonstrate restoration potential within investment decision-making timeframes. Needs to be based on best science and independent expert review.	Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.
13	Rec 1.3	The emphasis on site restoration caters to projects with temporary footprints and does not provide constructive options for development with more permanent impacts like mining or infrastructure	This point is now address indirectly in Guideline 5 (Limits to biodiversity offsets). Project with permanent impacts, as long as they don't fall in the IUCN's Policy on Biodiversity Offset can go ahead with their project.
13	Rec 1.4	The concept of restricting the use of offsets is similar in spirit to the guidance for tier 1 critical habitat for PS6. However, in practical application a no-go decision is rarely a realistic alternative and PS6-compliant projects have figured out how to use offsets to generate net gains in these contexts. For example where it's not practical to create further protected areas, one could implement training programmes with local communities in conservation management, or create monitoring programs etc. In theory there should be places where impacts cannot be offset, but in practice whether or not this applies needs to be determined on a case-by-case basis. For example, a project in a degraded area that is designated as a KBA would be an ideal candidate (ecologically) for an offset that restores and conserves an offsite area. The outcome could be a net gain for the KBA (and its triggers) that otherwise would never be possible with a project not allowed to use offsets (or no project at all). "...offset activities are initiated and on track prior to the implementation of the project component; and funding is provided for independent evaluation over an appropriate timeframe. Companies ensure that funds to achieve net gain outcomes through offsetting are available and held in trust by a third party..." This is impractical for projects occurring in countries who do not have offset banking (i.e. any country other than the US/ Australia) Determining who the third party is will be a challenge for business to accept. The inclusion of Free, Prior, and Informed Consent (FPIC), included here within the details of offset recommendations, seems inconsistent with the complexity of the issue and the implications it may have for corporate uptake of the principles. A separate principle around Indigenous People and Human Rights may be more appropriate.	Guideline 5 now focuses specifically on limits of offsets and has taken into consideration also the business limitations and realities of the conditions of an area. The reference to FPIC has been maintained as it's considered as a critical step to move forward a project that will have a permanent residual impact.

13	Rec 1.5	<p>While "establishment of cooperation and collaboration initiatives with other business operators, and other private and public entities in the area to strengthen the collective contribution of business to the conservation of KBA biodiversity values" may be good conceptually, it places the burden on private companies and underestimates the essential role of government in many developing countries.</p> <p>For example, even though Project X has a robust conservation program for copper-cobalt flora and has collaborated with various academic institutions and other mining companies in the region, the current government policies/laws effectively preclude in situ conservation (avoidance), which is the primary step of the mitigation hierarchy, and limit the potential for success regardless of collaboration. Thus, particularly in developing countries, more effort needs to be devoted towards working with governments as changing government policies is essential to achieving broader conservation goals</p> <p>Suggest the gist of the recommendation is changed towards 'business commits to strengthening and supporting local conservation capacity'</p>	<p>The structure of the document has changed from Principles/Recommendations to Guidelines to address this and other concerns related to the tone that was perceived too "prescriptive".</p>
13	Rec 1.6	<p>"The calculation of residual impacts includes direct, indirect and cumulative impacts"</p> <p>This recommendation along with recommendations 2.3, 5.1 and 6.1, plus numerous points in the preceding text seem incongruent with the objective of fully mitigating direct and indirect impacts of a project/development so as to achieve no net loss or a net gain. If the direct and indirect impacts are fully mitigated, what incremental impact is there to combine with the impacts of other developments?</p>	<p>The reference to the type of impacts included in the scope is now part of the definition of the Applicability. As a reference the document now uses the definition established by International Finance Corporation (IFC) of Area of Influence.</p>
13	Rec 1.7	<p>Static baselines" are not realistic in most developing countries and the use of a dynamic baseline has gained increasing attention in the literature and discussions of NNL under PS6. Static baseline assumes that if a particular project did not occur, the biodiversity values of a particular area would remain unchanged. In reality, this is clearly not the case. In most developing countries there are continual impacts on local biodiversity through a number of non-project related factors (e.g., subsistence hunting/farming, artisanal mining, timber harvest, etc.) or changes due to outside pressures (e.g., climate change). What if there is no baseline to begin with?</p>	<p>This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)". Furthermore, the KBA reports (available through IBAT) can also help in establishing existing status of the KBA trigger element(s) and threats.</p>
13	Rec 1.8	<p>Is the KBA initiative going to develop a template and guideline regarding the type and methodology for baseline/monitoring data collection to allow for a standardized easy-to-access and interpret KBA dataset that can be incorporated into the IBAT or similar system for academics, business, organisations etc.?</p>	<p>The KBA Partners will likely develop a series of guidelines focusing on data collection (but not specific to business).</p>
13	Rec 1.9	<p>"...commitments made remain contractual obligations in the event of the divestment of the asset" This may not always be possible depending on the nature of the divestment and how far the project progressed through the investment pathway. It is not legally appropriate to have these in the contract between buyer and seller. Suggest this is rewritten to indicate that the business makes a good faith effort for ongoing actions and commitments to remain as obligations for the project or site in the case of divestiture.</p> <p>Alternative options outside of contractual obligations could be possible, e.g. through ensuring mitigation commitments are in the project's environmental permit. However, the agreement should be with government and attach to the asset, and therefore transfer with ownership.</p>	<p>This topic (responsibilities in case of divestment) has been maintained but the tone has changed. The recommendation has been replaced by Guideline 1.9.</p>
13	Rec 2.2	<p>Business needs to be afforded access to this data. Without access to the KBA layers in the IBAT tool some organisations or individuals may be constrained in applying the policy</p>	<p>This point has been included in the IBAT discussions about membership/access fees.</p>
13	Rec 3.2	<p>The requirement that a "business modifies its practices to avoid any further residual impact on the KBA elements for which the area qualifies as a KBA" in the event that a new KBA is established could be very burdensome/infeasible (see note on principle 3 above)</p>	<p>This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).</p>
13	Rec 3.3	<p>The requirement for conservation actions to mitigate "residual impacts generated by the business associated with their operations prior to 2017 could be very burdensome/infeasible (see note on principle 3 above)</p>	<p>This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).</p>
13	Rec 4.1	<p>"outset of the operations..." Needs definition of what is meant by 'operations'. If it means production then no problem but there are numerous activities (that can generate impacts) required to get an operation to production status. Due to the stage gate nature of new projects it will not always be possible to have financing planned for the entire operational phase when these 'early works' activities commence.</p>	<p>Guideline 7 still reads "... financing ... is secured from the outset of the operations". This point will be clarified in the web based guidance document.</p>
13	Rec 4.3	<p>"The business...plans, designs and tests the restoration prior to the project implementation" could potentially be a long and onerous / infeasible process see comment on 1.2 above</p>	<p>This concept is now built in Guideline 4 (Limits to restoration) and the "plans, designs and tests" is replaced with the call for "restoration potential ... is demonstrated before project activities commence".</p>
13	Rec 4.4	<p>Requiring "financing of any restoration and/or offset plan...before the impact occurs, with funds being transferred to an appropriate vehicle before business activities begin" could be very burdensome, particularly as detailed restoration/reclamation plans (and associated costs) are often not developed until later in a project life</p>	<p>Recognizing that principle 4 and related recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").</p>
13	Rec 5.1	<p>Management of landscape scale/ cumulative impacts that have no correlation with the project will be beyond the control of the business - more of a government role.</p>	<p>This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.</p>
13	Rec 5.2	<p>Management of landscape scale/ cumulative impacts that have no correlation with the project will be beyond the control of the business - more of a government role.</p>	<p>This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.</p>
13	Rec 5.4	<p>Collaborative multi-stakeholder partnerships are of course needed and supported by business but can be beyond the ability/capacity of business to establish, coordinate and facilitate without willing partners</p>	<p>Recommendation has been deleted.</p>
13	Rec 5.5	<p>Not clear how this relates to the principle of landscape level assessment. Is this about prioritising KBAs for broader oil spill etc responses</p>	<p>Correct. The document has been since completely restructured and this recommendation is no longer highlighted as a stand-alone action.</p>
13	Rec 6.3	<p>It is unrealistic and counterproductive to say "no negative impacts on rights holders and stakeholders" There are always trade-offs. Suggest changing to "no significant, unmitigated negative impact on rights holders, and stakeholders will be consulted and considered in line with accepted good practice"</p>	<p>The KBA Partners concurred that key decisions that would lead to negative impacts on biodiversity should obtain the consent of any impacted community (Guideline 5). Therefore if the communities agree, impacts can occur.</p>
13	Rec 6.4	<p>"... Compensations should be culturally appropriate and negotiated with representatives of indigenous peoples and local communities groups" Add to the end of the sentence: "and be aligned with accepted best-practice engagement guidelines with indigenous peoples"</p>	<p>This issue has been now eliminated from the scope of the Guidelines.</p>
14	75	<p>One of the most effective ways to preserve biodiversity is through conservation of sites that have high biodiversity value and their cohesion.</p>	<p>The section has been deleted.</p>

14	90	ecological integrity and connectivity ;	Criterion C refers to sites that have globally outstanding ecological integrity and maintain their full complements of species in their natural abundances or biomass, support the ability of species to engage in natural movements, and allow for the unimpeded functioning of ecological processes. These sites are large and essentially undisturbed by significant industrial human influence.
14	Principle 2	On the biodiversity elements, and the supporting ecological context and continuity , which....	The Principle has been dropped.
14	Rec 5.2	The business integrates the wider landscape, watershed, or seascape in its plans to manage its impacts on the KBAs and their ecological connectivity . (This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
15	1	Executive summary: - This section should include next steps in terms of process and uptake. - This section should include a summary of the principles and goals as well as an explanation of their applicability (the intended users of the guidance and where it should be used).	The revised Executive Summary does not include the 15 Guidelines as these are now much more succinct and hopefully simple to grasp.
15	1	Suggestion to include summary of applicability of the Principles.	The applicability is now included at the beginning of the new Section 3 about the Guidelines.
15	4	Agreed scientific criteria – this should note that this is agreed by IUCN rather universally, widely agreed.	The text about the KBA Standard has been revised and boiler-plate text has been used.
15	4	Hundreds of experts – would be useful to have an explanation of who these experts are and why/how they were chosen.	Reference to the 100s of experts who participated in the KBA Standard development has been deleted (however their names can be found in the introductory section of the KBA Standard at : https://portals.iucn.org/library/node/46259)
15	7	<i>Enable should be replaced by more cautious wording, e.g. may help.</i>	Sentence has been deleted.
15	15	Definition should be provided for in and around KBAs	The focus is now on "risks to biodiversity" in relation to KBA trigger element(s). Therefore "in and around" is no longer relevant.
15	20	Suggestion to list the 25 representatives.	Reference to the workshop (End Users Consultation) is now in the acknowledgments but names are not made as it would seem an endorsement. Furthermore, we would then have to include also the names of the organizations that participated in the public consultation which we decided not to for the same reason.
15	23	Suggestion to include "Key businesses and business sectors were given the opportunity to comment during the consultation process, but were not otherwise involved in the development of the proposed guidelines" to accurately reflect the involvement of business in the process.	The Acknowledgment now states that "This document also builds on the input provided by the participants to the end user consultation workshop... and by the organizations that submitted comments during the public consultation period". No reference to any specific sector of society is made.
15	24	It does not seem reasonable that these principles are applicable to all businesses.	The revised Guidelines have been designed with a risk based approach in mind, independently from the size of the business (a small business with large risk on biodiversity has a major responsibility).
15	28	Line 24 notes applicability to all businesses but Line 28-29 notes applicability to existing and new business operation in and around KBAs having direct, indirect and cumulative impacts on the KBA site. Should this read 'residual impacts'? Unclear whether the guidance applies to all businesses or just to those with residual impacts?	The revised version clarifies this as it now recommends ALL businesses the implementation of the Mitigation Hierarchy and 15 specific guidelines.
15	28	There are other difficulties associated with applying guidance to existing operations – it is better to encourage ad-hoc voluntary approach to existing operations. Difficulties include: - Developing retrospective baselines - Retrospectively understanding and identifying direct, indirect and cumulative impacts.	These points are discussed in more details in the Guidelines section.
15	38	How can the principles ensure that companies comply with their own internal standards?	Section has been deleted as unclear.
15	38	This has been improved since Draft 1, but there does still seem to be a focus on businesses implementing change and not governments, regulators etc. Suggestion to edit to allow for 'best efforts' to use the guidance.	This challenge (the role of governments) is referred to in the Sub-Section on "Conditions for Successful Implementation" and it will be further explored in the web base guidance.
15	38	The language and text presented in the paragraph should be updated to provide greater clarity and it refers to the guide being used as a minimal standard; the guide should not be considered to be standard but however good practice guidance.	The change in structure should take care of this concern.
15	47	Suggestion to rephrase, this sentence is unclear – to which voluntary sustainability standards is it referring to? Is this guidance considered as a tool to harmonize the various standards?	Language has been revised to avoid confusion. Specifically, this section has been deleted.
15	62	The use suggested for Regulators would most likely be the same as for Companies; it is guidance to inform rather than a tool to set minimum standards.	Correct. In any case the Guideline in this version (but also previous one) are designed as voluntary tool and therefore their use will depend on the level of commitment of the user. The KBA partners confirmed that from their perspective "[t]hese guidelines are recommended minimum requirements for business operations having direct, indirect and cumulative impacts on a Key Biodiversity Areas, unless the national or local law is more stringent, in which case the law shall prevail" (see Acknowledgment section).
15	95	What are KBAs and how are they identified? Bottom-up exercise does not adequately reflect that sites are identified through vigorous and detailed site monitoring by competent personnel. Suggestion that this changed to site examination.	This section has been deleted.
15	95	"Bottom-up exercise" seems to be in contradiction with the later statement that KBAs are identified in consultation with non-governmental and governmental organizations (which could be considered "top-down"). Local stakeholder consultation (see comment on line 95) is an important element of a "bottom-up" approach.	This section has been deleted.
15	112	Paragraph could benefit from a discussion on how loss of biodiversity can be associated with community subsistence needs (e.g., overfishing/poaching, land clearing for subsistence farming, etc.), and how the introduction of additional economic income by businesses can make a positive contribution to the avoidance of such impacts. Some noted that this paragraph should be removed or rewritten as it does not sufficiently address social issues. These may be better addressed in a separate document.	The section has been shortened but maintained as it was felt it was important to note the connection between people and biodiversity (and among people in general, nature dependent communities including indigenous peoples). A section of the on line guidance document will discuss this topic in more details.
15	112	The section is discussed under the heading "What are KBA's and how are they identified", suggest that this is discussed under a more suitable heading such as "KBA's & Indigenous People".	The structure has changed. This section, now shortened, is in Section 1 "Business and KBAs".
15	145	An emerging need from the KBA end-users Application of AoI and full life-cycle is reasonable, to extend to full supply-chain may be impractical, better to encourage businesses to work with SC where possible (where opportunities exist). Suggested edit to read 'and when feasible, the supply chain'.	This Paragraph is now in section 3 - Guidelines for business activities; under the paragraph implementation. Specifically in relation to the integration of the Guidelines in the sourcing policies, the document now reads "The Guidelines can also be integrated ..."
15	150	The word 'universal' implies a strong recognition and acceptance by a wide range of actors/stakeholders. Suggest removing.	The word "universal" has been dropped.
15	162	The development of the Guiding Principles and Recommendations Suggestion to expand on how businesses were consulted and how comments were taken into account.	The section Acknowledgments clearly spells now that the document has been prepared by IUCN with input and guidance from the KBA partners and other input collected during a workshop and a public consultation.
15	163	Name the 25 institution.	The reference to the various consultations is now in the Acknowledgments and there are no references to number of participants nor sectors of society.

15	182	Applicability, implementation and definitions Given the early maturity of the document, the line They should be the minimum standard businesses should apply asks a lot for guidance that has not been widely tested – there are still concerns over the practical applicability. Suggested edit to 'They may provide useful guidance to help define minimum applicable environmental standards' or 'They may provide useful guidance to help define Companies' environmental standards when operation in KBAs'.	The Guideline in this version (but also previous one) are designed as voluntary tool and therefore their use will depend on the level of commitment of the user. The KBA partners confirmed that from their perspective "[t]hese guidelines are recommended minimum requirements for business operations having direct, indirect and cumulative impacts on a Key Biodiversity Areas, unless the national or local law is more stringent, in which case the law shall prevail" (see Acknowledgment section).
15	182	As above regarding supply chains – may be impractical.	With regards to the sourcing policies, the document now reads (In Section 3 / Applicability) "The Guidelines can also be integrated ..."
15	192	Suggested Aol edit – 'area of influence for example as defined by permitting authorities or by default as per IFC'.	Accepted. The applicability is now aligned with IFC's definition of Area of Influence (See Section 3)
15	200	This bullet should note that local and national regulations will apply foremost.	This is now mentioned in the Acknowledgments.
15	200	The guidance encourages wide stakeholder engagement to understand different informal views on KBA management. The guidance should acknowledge that sometimes engagement is not compatible with regulators timeline or stakeholders are not always aligned and should provide guidance for this.	The point is correct. But as these are Guidelines we did not feel we needed to reference all the situations that would limit the implementation.
15	206	Offsets should primarily be designed in accordance with regulations or other legally binding requirements.	Offsets and their design are now only included in Guideline 5 which builds on the IUCN's Policy on Biodiversity Offset.
15	206	Reference to current and upcoming guidance should be rephrased. Should read 'offsets should be designed and implemented in accordance with regional and national policy, legislation and/or guidance. Guidance may also be obtained from other documents such as, for example, IUCN's'... Moreover, there may be additional/other best practice guidance that could be considered appropriate for offset management (not just the IUCN and BBOP). It's preferable to not constrain the design/implementation of offsets. Suggest that the text should be updated to state 'offsets designed and implemented in accordance with best international practice e.g. IUCN, BBOP etc.'.	As it's an IUCN document, the IUCN's Policy has been retained as the key reference for the design of offsets.
15	211	The current text in the document is not adequately clear that the business must comply with the relevant national and local legislation. The legislation of the country where the KBA is located must be complied with, even if it does not follow the principals of the guidance. Therefore, implementation of the principles needs to be undertaken in accordance with local legal requirements. Propose the following updates to the text 'The Principles and Recommendations have been drafted on the assumption that the business complies with all applicable laws (local & national). Should local laws not be aligned with the implementation of the KBA principles, the local legislation takes primacy'. For clarity, also suggest to insert (at end of bullet): 'Where local laws inhibit (or: are in contradiction with) the proposed Principles and Recommendations, the business must give priority to existing legal requirements.'	The paragraph has been changed and moved under Acknowledgments.
15	219	Many companies will not have access to IBAT, especially SMEs.	This comment has been shared with the IBAT Partners which were in the process of revising the fee structure.
15	225	It is stated that businesses should take a position of supporting good governance [...] if this is absent. The guidance should define good governance. It may also be incorrect for industry to take this role.	This sentence has been deleted.
15	230	Suggestion to expand the definitions section into a longer glossary of terms and references throughout.	Done.
15	230	Suggestion overall to align definitions better with external definitions, integrating CSBI, IPIECA, IFC etc. definitions. Suggestion to add definition of precautionary approach and exceptional circumstances.	Done in the glossary.
15	238	Indirect impact definition unclear, suggestion to change to 'an impact associated with a planned intervention, but not directly resulting from the planned intervention. Examples include follow-up activities by others'	Done. Definitions are now in the glossary.
15	240	For the definition of cumulative impact, the guidance needs to acknowledge and perhaps provide guidance for when other industries do not wish to share information.	This is beyond the scope of this document.
15	249	Suggestion to read significant residual impact. If an impact is insignificant from a BES perspective, it may not justify extra efforts/costs associated with offsetting. This edit also aligns with the offset definition line 271-77.	Definitions are now in Glossary and based on accepted definitions.
15	263	Need to define proximity to KBAs	This concept has now been abandoned.
15	278	ACAs are not a part of the Mitigation Hierarchy as they can be directed toward BES features that are not significantly affected by the project. ACAs should not be seen as a means to achieve NNL or NG, it is important to be clear about this. This should be its own numbered definition rather than a sub-bullet beneath the MH. The distinction between ACAs and other elements of the MH is not so much that ACAs are difficult to quantify but that they are: • Voluntary even in the face of legally binding remediation requirements • Not designed to mitigate for project impacts. Suggestion to edit (according to compile wording from IPIECA's BES Fundamentals, the IUCN and the CSBI guidance): 'ACAs are voluntary measures to benefit biodiversity and/or ecosystem services that lie outside of regulatory or other legally binding obligations. They are not designed to mitigate impacts by business activities, but refer to a wide range of potential actions intended to achieve positive outcomes for biodiversity and/or ecosystem services.'	Definition of ACA is now in Glossary (taken from Biodiversity A to Z).
15	279	Footnote 7: Footnote should apply to both Offsets and Restoration. As is, offsets seem to be given priority to restoration, which is not consistent with the mitigation hierarchy.	Footnote 7 has been deleted. Hopefully Guidelines 4 and 5 (Limits to restoration impacts and Limits to Offsets) clarify the view of the KBA Partners on how to manage the uncertainties related to impact restoration and offsets.
15	280	Suggestion to edit heading to read Approach to the development of Guiding Principles and Recommendations for Responsible Business Operations in and around KBAs'	Section has been deleted
15	282	The text mentions a module but it is unclear what this is a module of or where it fits amongst other approaches.	Word "module" has been abandoned.
15	282	The goal is mentioned here but not presented until p.18	The goal is no longer included.
15	284	Italicised sentence is ambiguous.	Section has been deleted.
15	286	At end of paragraph suggestion to add 'where local laws inhibit (or: are in contradiction with) the proposed Principles and Recommendations, the business must give priority to existing legal requirements' to acknowledge that businesses must follow legal requirements above all else.	Reference to local and national laws is now in the Acknowledgments and in line with the recommendation provided by peer reviewer.
15	294	• Use and refer to the UN Guiding Principles on Business and Human Rights 2011 as this is the key reference document for all businesses on human rights related issues. • FPIC cannot be achieved where stakeholders disagree amongst themselves (which is somewhat common). Paragraph does not consider that preferences by local stakeholders may go against the 6 Principles, e.g. stakeholder support for land clearing for housing or agriculture which may negatively impact biodiversity conservation.	The section on Stakeholder engagement, a "Cross-cutting practice" in Draft 2 is now highlighted in the "conditions for successful implementation" and is also explore in more details in the on line guidance, which will refer to existing best practices and IUCN's policies.
15	294	• Define rights holder. • Since rights-holders are a subset of stakeholders, always use term stakeholders first.	Text has changed. This editorial comment is no longer valid.
15	295	• Suggest deleting reference to human-rights based approach and the UN family planning association and instead referring to and using the language of the UN GPS (above) which has been adopted by governments, business, and civil society. The UNGPs references 'meaningful consultation with potential affected groups and stakeholders'. • Rewrite last sentence as suggests that FPIC will apply to vulnerable local communities. FPIC only applies to IPs and tribal peoples and those defined under IFC PS 7 but not to vulnerable people and not to all impacted people. • Suggested re-write 'the business will engage through mutually agreed, transparent and culturally appropriate consultation and impact management processes.'	The section on Stakeholder engagement, a "Cross-cutting practice" in Draft 2 is now highlighted in the "Conditions for successful implementation" and is also explore in more details in the on line guidance, which will refer to existing best practices and IUCN's policies.

15	298	See previous comments on making data and information publicly available. Regulatory entities, companies, their potential lenders and other stakeholders (e.g. scientific collaborators and local communities) must consult with each other to determine an appropriate time frame as well as the appropriate means by which information should be distributed. It should not be expected that data will be made widely available on global public websites. Mechanisms must also be in place to protect data ownership and publication rights for a length of time to be determined on a case by case basis. Replace compensate for 'remediate' – this is current vocabulary and may include but is not limited to compensation.	This cross cutting practice has now been included as a Guideline (Guideline 11 - Reporting on KBAs as part of the company's environmental performance). Furthermore, Guideline 14 (Sharing biodiversity data) addresses the opportunity for conservation of business sharing relevant data with the KBA Partners. Guideline 6 (Biodiversity monitoring) recognizes the importance of considering confidential information.
15	302	Procedures to prohibit bribery or corruption should be in place at the corporate level and should not need to be specifically developed at the project level. Suggest to replace shall develop, document and implement policies... with 'shall ensure that corporate policies ... are in place and being followed by employees and contractors'.	This topic has been removed as it is considered to be part of general management requirement and not specific to the management of risks to biodiversity of KBAs
15	Goal	<ul style="list-style-type: none"> • Suggestion to define enhancement. It was noted that attempting to enhance BES could possibly be damaging. • Suggestion to remove '... and the supporting ecological and socio-cultural contexts' out of the goal and focusing the guidelines on the ecological considerations and recommendations. The goal as written may be contradictory depending on the goals, objectives, initiatives etc. of the communities around KBAs and this complex and very important topic would be better addressed in a more comprehensive way in a separate document. 	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
15	Principle 1	Clarity needed on what expected to qualify means - what are the qualification criteria? It was also noted that, if an area does not qualify, then it may not be appropriate to ask industry to make unnecessary efforts.	The applicability has been redefined to direct, indirect and cumulative impacts on the trigger element(s) of Key Biodiversity Areas (existing ones).
15	Principle 3	<ul style="list-style-type: none"> • The principle does not include any provision of "grandfathering" of previous impacts. Operations within areas that subsequently become designated as a KBA will be required to consider the impacts. The allocation of the KBA status should bear in mind the activity that has been undertaken at the location of the proposed KBA. • IUCN should keep in mind that existing projects are subject to agreements with governments, lenders, etc. that have been established before operations began. Company plans are based on agreed-upon mitigation strategies and expectations that were the basis for business planning at the time when a decision needed to be made on whether or not a project was economically workable. Changing the path of agreed-upon mitigation strategies or adding others that were not originally included in the planning process may not always be feasible from an economic perspective, or even be contractually permissible. • Overall, retroactivity should be discussed on a case by case approach; it cannot be a standalone principle. • Suggestion to emphasise this is voluntary-only. 	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
15	Principle 4	<ul style="list-style-type: none"> • Principle 4 requires setting aside funding from the outset, and this may run against commercial objectives of an upstream project (e.g. acquire rights to explore and then sell on to an as yet unidentified party...). • Where development will take place, the Principle should recommend that financial provisions for conserving the KBA should be allocated when there is sufficient knowledge about the potential impacts and an indication of the scope rather than at the onset of the project. Furthermore, financial allocation should be reviewed and revised as the project advances as understanding of the potential residual impacts improve. • Suggestion to edit to read 'Business carries out early scoping and assessment of potential significant impacts to all anticipated mitigation impacts...' 	Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").
15	Principle 5	Triggering the identification of a KBA is ambiguous. This could be understood as the expectation that businesses should contribute to triggering the identification of new KBAs, which is neither their expertise nor focus. Suggest '...and/or enhance the biodiversity elements that triggered the KBA designation'.	The Principle has been deleted, hence the clarification of what 'triggering' meant is no longer relevant.
15	Principle 6	The principle as stated has potential to hinder the ecological goal of the guidelines. Many stakeholders have established businesses or cultural practices that directly or indirectly impact the KBA and these impacts will likely grow as the needs and capacity of the community changes and the population grows. As mentioned previously, this is a very complex and important topic and may be better addressed in a more comprehensive document. Moreover, this seems to conflict with the role of governments.	The potential conflicts between KBA goals and those of society are recognized by the KBA Partners. However, the need to respect the right of communities and indigenous peoples remains an important part of the process. It was agreed not to treat this issue as a stand alone Guideline but to integrate it where relevant in the other Guidelines (such as in Guidelines 5 and 6).
15	Rec 3.1	<ul style="list-style-type: none"> • Suggestion to clarify expectations on a company when operating in a newly declared KBA. • Suggestion that targeted assessment of the impacts should be on the KBA triggering elements only, and not all impacts. 	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
15	Rec 1.1	<ul style="list-style-type: none"> • Suggestion to replace all possible with 'all realistically and practically feasible'. • Suggestion to reword whole section – currently it seems to imply that if a project is likely to have negative impacts that cannot be avoided or minimized that It should not proceed. But this is not in line with the Mitigation Hierarchy or IFC PS6 which include restoration and offsetting as mitigation measures. Suggested reword: 'Where the business has a new project near/ adjacent to a KBA the mitigation hierarchy should be adopted to managing biodiversity and Ecosystem Services. The business considers all possible preventive measures including relocating the project in other sites, prioritizing, where relevant, already degraded areas. In case it is demonstrated that, despite all mitigation measures, the project is likely to result in a negative significant residual impact on the biodiversity elements triggering the identification of the KBA, the Company should consider not proceeding with a project development.' 	Rec 1.1 is now replace by Guideline 2 (Priority to avoidance). The wording "All forms of avoidance" has been retained as it refers to specific technical measures such as spatial or temporal changes in the designs as well as project avoidance. The Guideline also now specifically refers to IUCN's resolutions and recommendations that specifically call for "no go" in KBAs for specific sectors.
15	Rec 1.10	Climate Change – remove or down tone, because climate change is not necessarily the immediate responsibility of business. The business does not have complete control over this risk, and so cannot accept full responsibility.	This recommendation has now been removed. References to "change" are now included in the section "Conditions for successful implementation" with a lighter tone. References to "climate change" are integrated in specific situations: in Guideline 4 (Limits to impact restoration) and Guideline 5 (Limits to biodiversity offset').
15	Rec 1.10	<ul style="list-style-type: none"> • Wording lacks clarity, should be more succinct. • This principle seems to extend beyond the scope of the guidance. The MH process and non-trigger elements (the supporting ecological context) seem sufficiently covered throughout the document. • It is not clear why the guidance is targeting non-trigger KBA elements. • Further clarity is needed on the applicability of NNL and NG (also consistency of language needed – net gain, net positive etc.). • Suggestion to remove Principle 2 or consolidate Principle 1 and 2 as the current version of Principle 1 is not driven by the KBA standard. Furthermore, the Principles apply higher requirements than IFC PS6 with respect to achieving Net Gain. It would be preferred if the guidelines used a similar approach to PS6 as it would provide greater consistency for business. 	This recommendation has now been removed. References to "change" are now included in the section "Conditions for successful implementation" with a lighter tone. References to "climate change" are integrated in specific situations: in Guideline 4 (Limits to impact restoration) and Guideline 5 (Limits to biodiversity offset').

15	Rec 1.2	<ul style="list-style-type: none"> Suggestion to reword to acknowledge that process used for restoration will be based on a scientific approach: 'Empirical expert advice and best available scientific evidence should be used to determine the precautionary measures. These measures provide the foundation for the restoration plans which will be subsequently implemented to address residual impacts and achieve restoration success. The restoration principles should be developed in advance of project execution with further design later in the project timeline.' Suggestion that request for empirical expert advice and best available scientific evidence to prove effectiveness of restoration plans may be somewhat excessive at this planning stage as this is often long-term and so benefits not seen straight away. Suggestion to replace calculations with 'estimates' as calculation implies quantitative certainty which may not always be possible for biodiversity. It was noted that including demonstration of restoration potential before project activities commence... may not be possible, especially as that early on actual impacts to species or habitat may be unknown. Suggestion that these can be agreed/drafted but should be subject to review. The rigidity in place may mean that there is no accommodation for site conditions/changes once activity begins. Furthermore, project execution often relies on third parties' contractors to provide detailed design and execute the project. It is unlikely that the early planning phase of a project would develop the design detail to the extent that is required by Point 1.2. 	<p>Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.</p>
15	Rec 1.3	Suggestion to omit this recommendation and feed it into 1.1.	The decision to keep separate "preventive" measure (such as avoidance and minimization" from restoration measures has been reconfirmed. The separation highlights the increasing biodiversity risks associated with the likelihood of success of the various steps in the mitigation hierarchy from avoidance to restoration and then offset.
15	Rec 1.4	<ul style="list-style-type: none"> Overall suggestion to align the recommendation with IFC wording on the use of offsets, available here. http://www.ifc.org/wps/wcm/connect/bff0a28049a790d6b835faa8c6a8312a/PS6_English_2012.pdf?MOD=AJPERES What would be considered as exceptional circumstances in which offsets may be considered? Suggestion to replace have been proven successful... with 'are considered capable of delivering net gain outcomes ... based on independent review and validation by relevant experts'. Suggestion to remove held in trust by a third party. Technicalities on how funds are to be secured should be left to the immediate stakeholders, could possibly be replaced with 'Businesses and stakeholders should ensure sufficient availability of funds to achieve agreed-upon offsets, including any intended net-gain outcomes'. Suggestion to replace last sentence with 'Offsets should be designed in agreement with existing legislation and/or requirements, where applicable, and/or with guidance from other recognized sources (e.g., IUCN Offset Policy)' rather than making one standard mandatory. The recommendation does not give guidance on what to do if a stakeholder does not agree with the use of offsets. 	<p>Recommendation 1.4 is now replaced by Guidelines 5 and 7 (Limits to biodiversity offsets; Long-term financing of the mitigation measures). The structure has been turned around: Guideline 5 is now about "limits to offsets" which are based on the recently approved IUCN's Policy with additional 4 situations specific to impacts on KBAs.</p> <p>Guideline 5 reconfirms that FPIC should be obtained in order to proceed.</p> <p>Guideline 5 reconfirms that Offsets should follow IUCN's Policy.</p> <p>Guideline 7 replaces the reference to how to manage funds. The reference to third party has been deleted as it was recognized to be too prescriptive.</p>
15	Rec 1.5	<ul style="list-style-type: none"> If the intent is to achieve voluntary buy-in by businesses and governments seeking economic growth, this could be difficult to achieve if guidance requires/asks for (as opposed to suggests) support beyond project impacts. Suggest 'Business should consider/seek where feasible supporting the enhancement of ...' Establishment of cooperation and collaboration initiatives with other business operators needs to be qualified to acknowledge that independent businesses are free to opt in or opt out of such initiatives. 	This recommendation has now been replaced with 2 Guidelines relevant at the "Corporate level": Guideline 12 (Additional conservation action) and Guideline 13 (KBAs as targets for offsetting impacts elsewhere). The tone of the 2 (and all) Guidelines has also changed from a requirement to a more descriptive situation.
15	Rec 1.7	Seems out of context and use of calculation implies a quantitative certainty which is not warranted in the context of BES, suggest to delete or align with IFC Good Practice Handbook - Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Furthermore, indirect impacts may be difficult to estimate where follow-up actions by others cannot be predicted.	The reference to the type of impacts included in the scope is now part of the definition of the Applicability. As a reference the document now uses the definition established by International Finance Corporation of Area of Influence.
15	Rec 1.7	Suggestion to replace static with 'representative' as this is more accurate – a static baseline does not exist in nature and it is good practice to include necessary statistical data to account for a representative degree of natural variation (through seasonal, temporal, spatial etc. changes).	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
15	Rec 1.8	<p>Noted that the business should design monitoring programs that are consistent with the anticipated ecological impacts, rather than commensurate to the size and scale of the operations.</p> <ul style="list-style-type: none"> Suggestion to remove independent auditing – significant additional cost, difficult to administer, and significant potential for disagreement on what is a good baseline and monitoring. With regards to publicly disclosing monitoring data - transparency is important, but it should be stressed that public disclosure may consist of providing data and data reports to the appropriate host-government agencies (or lenders for financed projects) for further distribution as they see fit. Consultation must take place to determine the appropriate timeframe and to establish the public audience. It should not be expected that all data will be available to full global public (e.g. via website). Measures must be in place to protect data ownership and publication rights. Moreover, concerns raised regarding public use of such data, what are the safety nets for misuse? 	This recommendation has been replaced by Guidelines 6 (Biodiversity impact monitoring). The reference to independent auditing has been removed. With regards to the public disclosure, the revised version allows for "... considerations for confidential information". With regards to sharing of the data collected, the revised Guideline calls for the data collected to be made available to the KBA partners "...consistent with the Red List Policy on sensitive data access".
15	Rec 1.9	Suggestion to remove – this goes beyond what a company can do legally. There is no basis for requiring purchasers to comply with guidelines or best practices that are not anchored in legal requirements.	This topic (responsibilities in case of divestment) has been maintained but the tone has changed. The recommendation has been replaced by Guideline 1.9.
15	Rec 2.3	As above, replace calculation with 'estimate/estimation'.	Change made (where relevant as Rec 2.2 no longer exists)
15	Rec 2.4	As above, replace static baseline with 'reference conditions' or remove static.	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
15	Rec 2.6	As above, unclear how a business would be able to demonstrate restoration potential before project activities commence. There is concern that this may not be possible as may require an upfront investment of resources that may not always be possible/ justifiable given local context/ government expectations.	Rec 2.6 is now replaced by Guideline 4 (Limits to impact restoration). The 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.
15	Rec 2.7	Broad stakeholder agreement is not always possible as there are many competing interests among stakeholders. Replace independent offset experts with experts with experience in offset design – whether they are independent doesn't matter. Also, should be noted that this may be harder/limited in certain locations but industry should make best efforts.	This recommendation is now replaced by Guideline 5. The specific reference to "broad stakeholder agreement" has been replaced by "The development and offset should both have obtained the free, prior and informed consent of any impacted local communities", making it hopefully more precise in defining where consent should be sought.
15	Rec 2.9	As above for comments regarding public disclosure and transparency.	This recommendation has been replaced by Guidelines 6 (Biodiversity impact monitoring). The reference to independent auditing has been removed. With regards to the public disclosure, the revised version allows for "... considerations for confidential information". With regards to sharing of the data collected, the revised Guideline calls for the data collected to be made available to the KBA partners "...consistent with the Red List Policy on sensitive data access".
15	Rec 3.2	<ul style="list-style-type: none"> Wording should align with the Mitigation Hierarchy – business should 'aim to avoid and minimise and if appropriate restore or offset impacts'. Once operations have begun it is not realistic to expect a company to be able to avoid residual impacts. It would be possible for the operations to explore other mitigation approaches. Who will compensate the companies for any additional costs or lost revenue due to any modifications? In the UK, companies can seek compensation for lost income from restrictions on activities resulting from the designation of protected areas. 	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).

15	Rec 3.3	<ul style="list-style-type: none"> As above, for existing operations binding agreements are already in place forming the basis for planning. Some mitigation strategies may be changed but must be vetted carefully. The allocation of the KBA status should bear in mind the prior activity that has been undertaken at the location of the proposed KBA. 	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
15	Rec 3.4	<ul style="list-style-type: none"> Delete independently from project-related impacts. Focus should always be on biodiversity elements affected by the project, not on other elements over which they have no control. Furthermore, enhancement measures such as conservation actions cannot be made an expectation where established agreements do not contain such requirements. Suggestion to edit text to read 'business to support the enhancement of biodiversity elements where feasible...' Regarding collaboration, suggestion to alter text to indicate 'where relevant appropriate collaboration should be established'. 	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
15	Rec 4.3	<ul style="list-style-type: none"> As previous, suggestion to edit to read 'no significant residual impact'. It is not possible for a business to completely plan, design and test restoration prior to project implementation as some impacts may not be truly understood at this early stage and/or funds and time are spent poorly testing restoration methods which may no longer be applicable/needed once true impacts are understood. Restoration activities should be reviewed post-project to determine their effectiveness and may be modified at this stage to suit. 	This concept is now built in Guideline 4 (Limits to restoration) and the "plans, designs and tests" is replaced with the call for "restoration potential ... is demonstrated before project activities commence".
15	Rec 4.4	<ul style="list-style-type: none"> Technicalities on how funds are to be secured should be left to the immediate stakeholders – delete with funds being transferred to an appropriate vehicle before business activities begin. Replace and conservation outcomes demonstrated with 'and, if and where feasible, conservation outcomes demonstrated'. See previous comment that demonstrating actual conservation outcomes is a long-term process which may be unachievable prior to project start-up. 	This Recommendation is now partially addressed in Guideline 4 (Limits to impact restoration) and Guideline 7 (Long-term financing of the mitigation measures). With regards to Guidelines 4, the "plans, designs and tests" is replaced with the call for "restoration potential ... is demonstrated before project activities commence". With regards to Guideline 7, Recognizing that principle 4 and related recommendations were too prescriptive in terms of how funds for impact restoration and offsets were to be implemented, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").
15	Rec 4.5	Management capacity at the site level can be understood as 'project site managers', which is not meant here – suggest to clarify.	The reference to capacity building and site management has been deleted.
15	Rec 5.1	<ul style="list-style-type: none"> As this is guidance for management in KBAs, suggestion that the focus should be on the KBA not the wider landscape. Clarity needed on what the difference is between assessing impacts on non-trigger KBA elements and assessing impacts on the wider landscape. Further suggestion that there should be reference to tools that can be used to determine impacts. 	The scope of impact assessment is now integrated in the preamble to the Guidelines, in the section about applicability. The definition of the scope of direct, indirect and cumulative impact is taken from IFC Performance Standards.
15	Rec 5.2	Request for examples/case studies here if possible to demonstrate the recommendation.	This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
15	Rec 5.4	Suggestion to replace effective management with 'effective management of biodiversity'.	Recommendation has been deleted.
15	Rec 5.5	<ul style="list-style-type: none"> As above, regarding triggering identification of KBA. Maintaining biodiversity within an unplanned event is a key issue but may not be feasible. 	This Recommendation has been deleted and not replaced by any Guideline as it would be now be part of the risks to biodiversity that the company has to assess and manage which are dealt with all the Guidelines.
15	Rec 5.6	<ul style="list-style-type: none"> Though business try to mitigate undesirable impacts by contractors as much as possible (e.g., through contractor selection, training, audits, etc.), they are not by definition responsible for third-party actions or the impacts resulting from them. Third parties - often with guidance by the company - apply their own mitigation measures and are responsible for their actions. Suggestion to replace with 'the business prevents ...employees and strives to hold third-party contractors to equally high standards'. All activities should be reviewed in terms of its impact and risk to the KBA in the consent/ impact assessment process. The assessment will then provide a targeted approach to managing the activities in the KBA to maintain the biodiversity status. 	Accepted. This recommendation is now included in the "Applicability" section which refers that "The Guidelines can also be integrated into responsible sourcing policies for goods and services..."
15	Rec 6.1	Replace stakeholders with local stakeholders or local communities for clarity. Any shareholder could be considered a stakeholder.	The reference to stakeholder and right holders is now integrated in specific Guidelines and other sections (such as Conditions for successful implementation).
15	Rec 6.4	Compensation issues are highly complex and may be politically motivated. This is the responsibility of the government to decide on this action.	This issue has been now eliminated from the scope of the Guidelines.
15	Rec 6.5	Free, prior and informed consent focuses on indigenous peoples and communities and less so on governments. It is important to consult with all stakeholders including indigenous peoples, communities, governments etc. this subject should be addressed in a separate document.	This is a highly complex issue and for this reason a separate web based resource will provide links with reputable and specific guidance. However, the KBA partners decided to maintain the reference to obtain FPIC when indigenous peoples and local communities are impacts (in the section about "Conditions for successful implementation" and "Guideline 5").
15	Rec 6.6	As above, this is the role of government/landowner.	This specific requirement has not been included in the revised Guidelines.
15	Cont	Cross-cutting practices from the back of the document should be on the ToC	The revised structure does no longer include the cross cutting practices.
15	Title	Suggestion to adjust title to 'Principles and Guidance for...'. This will make it clearer that this a guidance document on how to work in a KBA.	The title has been changed to reflect the change in approach and tone of the document (from principles and Recommendations to 15 shorter and more focused Guidelines)
16	192	<p>Lines 192-194 state that: "The Principles and Recommendations apply to the business operations' entire area of influence, to the entire life-cycle of the operation, from pre-feasibility to closure (and, where relevant, site rehabilitation), and to its supply chains." Within the guidance document, however, there is no detail on the expectations of businesses when it comes to KBAs and their supply chains.</p> <ul style="list-style-type: none"> Are businesses expected to audit or conduct due diligence on all of their suppliers to ensure that they are following this KBA guidance? If not all suppliers, which could be a very tall order, how far down the supply chain does this responsibility extend? Does this apply only to suppliers that affect the same KBA as the business itself affects? Or are businesses expected to ensure that all of their suppliers, no matter where they are located, do not affect KBAs? <p>IRMA, itself, is grappling with what expectations it should place on mine site due diligence related to suppliers. Understanding IUCN et al.'s expectations related to businesses, their supply chains and KBAs could help IRMA in its own deliberation of what is an appropriate level of expectation.</p>	Section 3 Guidelines for business activities and specifically section "Applicability" states "The Guidelines can also be integrated into responsible sourcing policies for goods and services, the production of which could have direct, indirect and cumulative impacts on KBAs".

16	236	<p>The definitions of direct and indirect impacts state that: Direct Impact is an impact which occurs as a direct result of the planned intervention. May also be called primary impact or first order impact. Indirect Impact is an impact which occurs as a result of another change which is caused by a planned intervention. I think examples would help to provide more clarity on the difference between direct and indirect impacts. For example, IFC has some information that may be useful on the distinction between the two. http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/earning+and+adapting/knowledge+products/publications/biodiversityguide_understanding_business</p>	The definitions of direct, indirect and cumulative impacts have been now borrowed from BBOP (2012) and have now been included in the Glossary .
16	Rec 1.1	<p>The following two recommendations appear slightly contradictory, as they both refer to not proceeding with a project, but seem to give different guidance: 1.1 The business applies all possible avoidance measures including not proceeding with a project development where it is likely that negative impacts on the biodiversity elements triggering the identification of the KBA will occur . . . 1.3 Where avoidance is not possible, and minimization and restoration are unlikely to result in the maintenance of the KBA trigger elements, new projects or expansions should generally not proceed. 1.1 suggests that companies consider not proceeding with a project if it is likely that negative impacts on KBA elements will occur. 1.3 (and 1.2) provide more latitude, suggesting that negative impacts on KBA elements can occur, as long as minimization and restoration result in the maintenance of the KBA trigger elements. Additionally, in 1.1, "not proceeding with a project" is considered a means of avoidance (i.e., "The business applies all possible avoidance measures including not proceeding with a project development . . ."). So the wording of 1.3 is a bit odd. It starts with "where avoidance is not possible." But the solution, i.e., not proceeding with the project, is itself an avoidance measure (as per 1.1). One solution might be to avoid duplication, and delete the mention of "not proceeding with the project," from 1.1.</p>	The Principles and Recommendations approach has been dropped. The replacement with only 15 short and sharp Guidelines has hopefully addressed the need for more clarity.
16	Rec 1.2	<p>In Recommendation 1.4 you mention that if it is likely to take more than 10 years to demonstrate net gain for offsets, then a series of additional steps are triggered (e.g., a plan, external review, funding for independent evaluations, etc.). In 1.2, should there similarly be a timeframe over which restoration should be demonstrated? And/or should additional recommendations/safeguards be triggered if restoration is expected to take a long time?</p>	The challenges of impacts restoration are now captured more clearly as a stand alone Guideline (Guideline 4 Limits of impact restoration), which defines stronger safeguards on the use of restoration.
16	Rec 6.2	<p>Perhaps for this recommendation you could include some examples of how socio-economic benefits to local communities and indigenous peoples might support the conservation of biodiversity; and also explain that they might determine whether or not an approach is appropriate through consultation with the affected communities.</p>	This recommendation has been deleted as considered out of scope for these Guidelines.
17	General	<p>It is not clear in the introduction how the process of KBA identification and confirmation will deal with conflict between stakeholders or how trade-offs (e.g. between different user groups) would be prioritised. As a sustainability standard setter, it would be important that the KBAs are widely accepted as part of a global best practice and conflict may result in limited uptake of the approach.</p>	This is an issue that is out of scope for this document but it is dealt with by the KBA Partnership http://www.keybiodiversityareas.org/kba-partnership/kba-standards-and-appeals-committee
17	Goal	<p>There is no private property in the ocean, therefore clauses pertaining to private property or business ownership of an area do not apply.</p>	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
17	Goal	<p>Scale and area are key concepts within the KBA approach. In a marine context, an area-based approach may be less applicable or may present new challenges compared to a terrestrial approach. We recommend the committee to consider implications for wide-ranging species (e.g. tuna), areas outside of national jurisdiction, and the potential scale of a KBA versus the scale of operation of a fishery.</p>	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
17	Principle 2	<p>No Net Loss has not been developed extensively in a fisheries context. Fisheries are likely the only major industry which extract elements of biodiversity as their primary activity, therefore some biodiversity impact is deliberate and not "residual". What is the biodiversity conservation expectation here regarding the target species? Does NNL also apply, and if so how will this be dealt with within a KBA?</p>	The revised version of the document is likely to be more relevant to marine based activities such as fisheries. Certainly, Guideline 5, which defines a critical element of the mitigation hierarchy, is based on the IUCN Policy on Biodiversity Offsets which is designed to be applicable in all biomes.
17	Principle 3	<p>There are very different requirements depending on whether impacts are new or ongoing. It would be useful to clarify the intent of the baseline requirements – what is the baseline selection criteria for business which have been ongoing for many years (and therefore may have missing baselines), and what is the expectation for restoration in these cases?</p>	The Principle 3 and associated Recommendations have now been captured in Guideline 10 Responsibility for existing operations and made less prescriptive but still focused on compensation of historical impacts.
17	Principle 5	<p>Cumulative impacts will be challenging to measure due to data paucity in the marine environment, and due to lack of cooperation between different industries.</p>	This Clearly remains a challenge.
17	Principle 6	<p>Marine Stewardship Council is an environmental standard, and so the socio-economic requirements (such as those in Principle 6) would be out of scope for an MSC assessment.</p>	The potential conflicts between KBA goals and those of society are recognized by the KBA Partners. However, the need to respect the right of communities and indigenous peoples remains an important part of the process. It was agreed not to treat this issue as a stand alone Guideline but to integrate it where relevant in the other Guidelines (such as in Guidelines 5 and 6).
18	34	<p>ENGOS can also use the guiding principles and recommendations to engage businesses in new conservation partnerships that will protect biodiversity in KBAs</p>	This point is now captured in the Executive Summary (point 5)
18	72	<p>Global ecosystem services are valued at trillions each year http://www.sciencedirect.com/science/article/pii/S0959378014000685</p>	Reference to the financial value of ecosystem services has been deleted as it is considered generally an underestimation.
18	104	<p>Will the KBA Secretariat (or IBAT) also list candidate/proposed sites? If sites that are "expected to qualify" (Principle 1) should be considered, then proponents need to have a source of candidate/ proposed sites.</p>	No it will not.
18	110	<p>"...will differ depending on the conservation needs of the biodiversity that triggered KBA designation"</p>	Section has been reworded (see Page 10, Key Biodiversity areas, protected areas, and conservation priorities.).
18	112	<p>I might delete this paragraph or combine it with the next one. The section title is about what are KBAs are how they are identified. This paragraph has useful information, but is more about KBA management which may be out of scope for this document. Perhaps delete this paragraph and start line 129 with "Indigenous people and local communities....."</p>	Section has been restructured.
18	148	<p>"KBA Partnership"?</p>	Section deleted. However the KBA partnership is now clearly explained at the beginning of the document.
18	158	<p>Add "the Guiding Principles....."</p>	Section has completely changed (including the title of the document)
18	181	<p>Footnote: first use of the term "module". I'm not sure if this doc is a module or if module should be replaced with "the guiding principles and recommendations"</p>	Term "module" has been abandoned.
18	195	<p>Should there be a mention that the guiding principles and recommendations can also be used for development proposals that are not initiated by a business. For example, a road that is proposed by a government or government agency.</p>	That is the intent of the document (to apply to any type of business and project).
18	229	<p>"...mindful of the nomination process and strive to apply the guiding principles and recommendations to candidate and proposed sites."</p>	
18	282	<p>Goal 1 is lost behind the table, suggest moving the goal up in the report. The "socio-cultural context" mentioned in the goal is not included in the principles. Perhaps "The guidelines are structured around six principles....."</p>	The new structure does not include a Goal anymore. This text has therefore been deleted.
18	288	<p>I think these cross-cutting practices are part of the BBOP principles. The principles in this report could perhaps be streamlined if a recommendation was that offsets follow the BBOP principles.</p>	The cross cutting practices have been deleted (as the structure is now completely different). Some are now included in the "Conditions for successful implementation".
18	288	<p>Should the title be "...business operations that impact KBAs"? Just thinking about a development that is not proximate to a KBA, but could have a major impact (such as a mine 100 km upstream from a freshwater KBA)</p>	The scope has now been made more clear and to focus on the impact on KBA (and not on the location of the business).

18	Principle 1	Suggest rewording principle 1 and 2 so they are more similar, i.e.: 1) Businesses do not cause a net loss, and strive for a net gain, of the biodiversity elements that triggered designation of an existing or candidate KBA. 2) Businesses do not cause a net loss of any biodiversity elements of an existing or candidate KBA.	The Principles have been dropped.
18	Principle 1	Ideally, principle 1 should be a "significant net gain" since we know that no net loss almost always results in a loss http://www.huffingtonpost.ca/dan-kraus/the-problem-with-biodiversity-offsets_b_8601444.html	Now the Guideline focus only on the KBA trigger elements and a Net gain is required (see Guideline 5).
18	Principle 1	Should there be a recommendation about businesses supporting the evaluation of sites that could potentially qualify as KBAs. In Ontario, Canada a development proponent may be required to complete a wetland assessment to determine the significance of the site as part of the approval process.	This point is not included as a Guideline but as a general message to business that they should get involved in the KBA Partnership (see section "About the KBA Partnership"). Furthermore, the involvement of all stakeholders including businesses in the KBA identification process is the responsibility of the national Coordination Groups http://www.keybiodiversityareas.org/kba-partnership/kba-national-coordination-groups
18	Principle 3	Replace "newly declared KBA" with "proposed/ candidate KBA"	Principle 3 and associated Recommendations have been replaced by Guideline 10 Responsibility for existing operations which refers to "...operations started before the identification of the KBA or before these guidelines were issued".
19	16	In developing countries (Burundi for my case) wetlands, particularly marshes are threatened by agricultural activities, brickwork, basketry, and abundance and loss of biodiversity. And forests are destroyed for the search for firewood and coal or for trade. Consider integrating the "agriculture, deforestation of individuals within families in developing countries"	In the revised version we decided to avoid making reference to specific situations and sectors. There will be plenty of opportunities to provide examples of good (and eventually bad) practice of business activities affecting KBA target element(s) in the web base resource available through the KBA web site (www.keybiodiversityareas.org).
20	92	Could the document be more clear on who can propose a KBA (virtually it seems that it can be anyone) and who validates/approves the application? Does it include someone from the country where the KBA is? Are there rules to defining the scientific committee that will do the independent review?	The new section on the KBA Standard and KBA identification process (Section 2 "More about KBAs") is now hopefully more clear. Throughout the text there are plenty of references to the KBA web site also which provides more exhaustive information about the KBA Standard, and identification process.
20	102	How can the private companies access the most updated shapefiles on the KBAs defined for Mozambique, for example? For example if the limits are updated or if a new one is added how can we have that information on the proper timing? It seems that one has to do an official request to access the information. We don't understand why this information isn't available at the KBAs website at any time. If we want to promote and conserve these KBAs everyone should be able to download the information at any time...	Comment has been shared with BirdLife who is the manager of the World Database of Key Biodiversity Areas.
20	Goal	These areas (KBA) should be relevant information for the public sector at stages when they are granting (or not) specific areas (it would depend on the type of activity and impacts) to the companies.	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
21	107	With regard to this point, it seems to me that a consensus should be reached on how to integrate areas of multiple use, where there is a planned development that includes protection of biodiversity. Example of the Protected Area of Donoso, Panama. This area was stripped of its conservation status but in a later review, its category was returned. http://www.prensa.com/sociedad/Donoso-recupera-proteccion_0_4506299494.html	This is a critical point. One of the aims for developing the 15 Guidelines was to support the integration of best practices in areas where there is no legal protection. The Guidelines however also mention the type of development that is envisioned in protected areas based on IUCN's policies (and in particular WCC-2016-Rec 102).
21	196	Although this document is not a standard, it would be advisable to train the staff of Areas National Agency Protection specialized in this tool that would surely improve the formulation of management plans or the revision of those already established.	The advice is now included in the Communication and Distribution plan for the document.
21	Rec 1.3	I think that recommendation 1.3 should be integrated within the 1.2 since it is often better to deny from the beginning of the evaluations that a project is carried out, because the effects of projects that are disguised as having reversible impacts when interacting with projects around Have a greater impact when entering into synergy.	The approach taken in the revised document (and now focusing on 15 Guidelines) is to focus on the situations when restoration and offsets are not acceptable (Guideline 4 and Guideline 5).
21	Rec 4.1	Recommendation 4.1 is of vital importance as it ensures the financing of effective restoration and restoration measures, the creation of national funds should be evaluated where companies deposit bail through an insurer where it remains available throughout the life of the Projects to avoid companies ending up withdrawing the funds and cannot remedy the impacts.	This recommendation is now replaced by Guideline 7 Long-term financing of the mitigation measures. Furthermore, recognizing that principle 4 and related recommendations were too prescriptive in terms of how funds for impact restoration and offsets were to be implemented, the language is now focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").
21	Rec 4.2	This point is very important because the companies start operations with the appropriate personnel but then by reduction of costs they minimize the personnel dedicated to these tasks with which the effective conservation of the biodiversity is lost therefore this must be included within the environmental evaluations of the Projects.	As the revised version of the document aimed at offering more focused guidance (the 15 Guidelines), the decision was to focus only on the long term financing of the mitigation measures and avoid adding too many additional conditions which would be considered in any case good practice in any situation and not only in KBAs.
22	36 C376	It would be helpful to indicate the extent to which responsible management of KBAs is indicated either explicitly or implicitly in the normative standards, regulations, or frameworks of the entities listed. Where it is, there is a clear "hook" for pushing the adoption of the guiding principles. Where there isn't, the mechanism is not as clear. What is the point of leverage to argue for adoption of the principles where responsible KBA management is not part of the indicated governance frameworks?	KBAs are areas identified for their biodiversity values but this identification does not presume management. The section "KBAs, protected areas and conservation priorities" clarifies this. So there is no "hook".
22	211	Legal & legitimate business activity also requires respect for formal and customary land and resource tenure. This should be mentioned so that the document doesn't come off as elevating conservation interests without regard for rights of local and indigenous communities that may reside in, or utilize resources from, KBAs. (I see it in Principle 6 but it should be included in the framing, too.)	Reference to the law and links to the Guidelines are now captured in the Acknowledgments
22	Principle 1	"on the biodiversity element(s) for which the site qualifies, or is expected to qualify, as a KBA, or on its supporting ecological context" – this doesn't define a very clear scope for the principle, since "supporting ecological context" could be interpreted broadly to include all aspects of the ecosystem within or upstream / in the landscape with the KBA, or much more narrowly. In general standards should be defined and circumscribed as precisely as possible so that they can be clearly interpreted and applied, yet this seems very open ended and subject to widely differing interpretations.	The applicability has been redefined to direct, indirect and cumulative impacts on the trigger element(s) of Key Biodiversity Areas (existing ones).
22	Principle 2	It's not clear how the standard for biodiversity elements which has not or may not trigger KBA thresholds differs from the standard for those elements that do or may trigger thresholds. The former calls for "No Net Loss and preferably Net Gain" while the latter appears to call for exactly the same thing, although with different wording. Logically it would seem that actions affecting biodiversity elements triggering KBA designation should be held to a higher standard than those elements that do not trigger KBA designation, yet this does not appear to be the case here.	The structure of the document has been completely re-thought and the confusion between principle 1 and 2 addressed. Furthermore, the focus of the Guideline is now only the KBA elements that trigger the identification of the KBA.
22	Principle 5	This recommendation may often be a very good one for the purpose of making sure that biodiversity risks, impacts, and mitigation actions are addressed holistically. But I have trouble endorsing it as a generalized principle because in some cases effects could be quite localized or focused on specific biodiversity elements, in which case the recommended approach is overkill and poses an unwarranted burden on business. To me, a more generally applicable version of this concept would say that the assessment, management and mitigation affected biodiversity elements should be considered in their ecological context, at a scale appropriate to the nature of the business activities, their potential impacts, and the context in which such impacts must be managed.	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
22	Principle 6	What happens if social mandates under this principle conflict with ecological mandates under other principles – for instance the community that holds legitimate rights to land within a KBA decides they want to develop some of that land in a particular way that is at odds with other aspects of the guiding principles?	The Principle has been dropped. The potential conflicts between KBA goals and those of society are recognized by the KBA Partners. However, the need to respect the right of communities and indigenous peoples remains an important part of the process. It was agreed not to treat this issue as a stand alone Guideline but to integrate it where relevant in the other Guidelines (such as in Guidelines 5 and 6).

22	Rec 1.1	These (Rec 1.1 and 1.2) are fine as generic recommendations following the well-accepted mitigation hierarchy, but it seems that there is an essential consideration of what kinds of economic activities should be permissible in KBAs in the first place. A project with a relatively small footprint and/or where restoration is conceptually feasible may make sense to consider and apply these criteria, e.g., an underground gas pipeline. But it's hard to see how the hierarchy would apply in the case of business activity that results in long-term and large scale land-use change, e.g., establishment of cropland or plantations displacing natural ecosystems. Do we need a first-order principle that prohibits long-term and large scale land-use change in KBAs? This would align with the growing movement toward deforestation-free commodity sourcing. If the framework would begin by excluding such large-footprint endeavours in the first place, then to me the mitigation hierarchy would become a more tangible and clearly applicable framework for other kinds of activities.	The Guidelines now focus on Limits to biodiversity offsets (see Guideline 5), and set forward clear limits based on the IUCN Policy on Biodiversity Offsets which have been expanded in consideration of the definition of KBAs (Key Biodiversity Areas (KBA) are sites contributing significantly to the global persistence of biodiversity). Furthermore, the relevant IUCN's policy defining "no go" for certain sectors are referred to in Guideline 2 Priority to avoidance (these include WCC 2016 Rec 102; WCC 2016 Res 061 and WCC 2016 Res 045).
23	83	Change "plant and animal-species" to "species (here and after – or special forms) of living organisms (or beings)". There are a lot of groups of living organisms, not only plants and animals. Sometime not the species but other taxon or form can be a target object of conservation measures.	The text mentioned by the reviewer has been deleted to reflect with more precision the KBA official definition.
23	221	Delete: "IBAT will continue to be the portal for commercial use". The portal should be in open access by default and may having some parts with restricted access in exceptional cases.	Text has been revised. Now IBAT is described in a separate box.
23	250	Add: "(e.g. local, landscape-level, subnational, national, regional, continental, global)".	Definition from BBOP (2012) has been adopted.
23	Principle 5	Replace "watershed" by "catchment area". In the exact sense, a water body collects waters from its catchment area, and a watershed divides neighboring catchment areas. (RAS) (applies also to 5.1 and 5.2)	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
24	38	Is it worth mentioning company Environmental Management systems (EMS), also how it could link to company's ISO14001 requirements? Lots of sustainability managers are really struggling to work out how to integrate biodiversity commitments. Also there is a potential link to Global Reporting Initiative (GRI) (https://www.globalreporting.org/standards).	Link to GRI is now made through a specific Guideline on reporting (Guideline 11 Reporting on KBAs as part of the company environmental performance". With regards to EMS and associated requirements, the focus of the Guidelines is on additional measures that a company is recommended to adopt in addition to general measures (and EMS is considered a general measure to be adopted in any situation).
24	56	According to http://www.equator-principles.com/ , currently 89 Equator Principles Financial Institutions (EPFIs) – not 84 referenced in the document. I guess this number may change regularly.	This reference has been deleted.
24	103	"will be published in the official KBA database." Access to information will be vital if businesses are to engage in this process. Will the database be publically accessible? If so can details be provided here (e.g. weblink?).	The World Database of Key Biodiversity Areas is available through the IBAT. It's free for non commercial users. See https://www.ibat-alliance.org/ibat-conservation/
24	112	Whilst the two paragraph on indigenous people and local communities are important acknowledgements of KBA value, it does not really fit under the heading What are KBAs and how are they identified?	The document has been restructured and hopefully this elements is now more clear.
24	136	There is quite a bit of repetition between these sections. (136-139 and 152-155)	Section has now been deleted
24	137	Suggest replacing "international development banks" with the broader term of Financial institutions.	Section has been deleted
24	156	It's not clear from the consultation document, whether the introduction sections will be carried forward into the final version of the document.	The introductory section has been completely revised due to the comments received, mostly focusing on getting to a more simple and concise final document.
24	182	"They should be the minimum standard businesses should apply." Needs rewording, possibly just missing a "that"	Text has been modified and moved to Acknowledgment.
24	184	Possibly provide very brief clarification of meaning of direct, indirect and cumulative impacts. For example, a company may not realise that it is causing indirect impacts (e.g. through air emissions), or cumulative impacts if it does not understand the terms.	Terms are now defined in the Glossary.
24	185	The document makes limited reference to biodiversity offsets. Is it worth making an explicit reference to the potential of KBAs being a potential suitable offset location for losses caused by business activities outside of KBAs?	This is now included as a stand alone Guidelines (see Guideline 13 KBAs as targets for offsetting impacts elsewhere)
24	195	The purpose of the Implementation section is not clear. Based on the section heading I was expecting maybe some guidance on how a business may implement the programme (see comment below).	The section has been deleted and replaced by "Conditions for a successful implementation". Some of the elements in the original section (such as the reference to offsets) have been removed.
24	199	Not sure what "module" means.	The word "module" has been abandoned.
24	219	Many businesses will not be willing to pay for basic data on KBAs. Consider the EU Natura 2000 network. The protection of Natura 2000 sites can only occur if all regulatory authorities, as well as plan and project proponents can understand: a) where the boundaries of KBAs are, b) what the features of interest are, and c) what are the conservation objectives of the sites. Limiting data to IBAT is far too restrictive for the vast majority of businesses – this should be an easy access, free to use web-based system.	This comment is outside the scope of the document review. It has been shared with WCMC (as they maintain the IBAT Secretariat)
24	General	This document is aimed at businesses operating in or near KBAs. The business case for preserving biodiversity and KBAs is not made in this document. I suggest that the document set out clearly why it's important to businesses to do this stuff. Also, maybe make this argument closer to the front of the document to help encourage businesses to keep reading.	The revised document tries to do so in section 1 Business and KBAs, which highlights the importance of KBAs for people.
24	General	The overall document is not very user friendly for businesses, many of whom will not understand: a) the business case for action, b) how to start implementing this stuff, c) sources of advice and support. It may be worth having a revised implementation section that provide a mini tool-box or guidance on how a company can take this forward. This could be based on standard Environmental Management System methods (which they may already be familiar with and can slot into the company's EMS): i.e. plan, do, check, act. In relation to Plan, I'd suggest something along the lines of an approach that we'd use in relation to appropriate assessments for Natura 2000 sites / EIA process: 1. Identify KBA location in relation to business activities 2. Obtain information on KBA biodiversity features of interest / conservation objectives. 3. Identify pathways of potential impact / benefits (direct, indirect and cumulative) from company activities. 4. Assess potential mitigation according to mitigation hierarchy to avoid, reduce and minimise impacts. 5. Assess residual impacts and consider compensation mechanisms (e.g. offsets). 6. Identify additional conservation outcomes to deliver a net gain. 7. Monitor and adaptive management All lot of this is buried in the principles / recommendations, but gets mixed up and confused so it's not clear how a business applies this.	The document has been entirely restructured due to this and many other similar comments. The Principles and Recommendations have now been replaced by 15 focused Guidelines. The Guidelines aim at addressing specific measures that a business should adopt when its activities affect a KBA trigger element(s). The reference to management systems and other general processes such as EIA/ESIA is not made as these processes should be part of the management of impacts in any situation (and not exclusively for KBAs trigger elements).
24	Principle 2	All the recommendations repeat those from Principle 1. It is debatable whether focussing on non-KBA biodiversity features should form a major part of the KBA guidelines (compare this to the approach take under the habitats directive which only considers the qualifying features of the Natura 2000 site). Whilst there is broader merit in conserving biodiversity as a whole, it may be better to focus on supporting features / ecological context to the main KBA features – which would bring in a broader biodiversity base for action, but still maintain focus on the main purpose of the KBA.	The structure of the document has been completely re-thought and the confusion between principle 1 and 2 addressed. Furthermore, the focus of the Guideline is now only the KBA elements that trigger the identification of the KBA.
24	Principle 3	The recommendations broadly repeat those from Principle 1. I'm not sure it's worth trying to separate out historic impacts from operational impacts. I suggest combining all business activities whether existing or new – the principles apply equally – as does the same process to manage impacts.	The aim was to separate historical impacts. This is now captured more clearly by a specific Guideline (Guideline 10 Responsibility for existing operations)

24	Principle 4	There is overlap with this principle and principles 1-4. It seems to try to combine timing and finances. I'd suggest separating this. Timing is dealt with in earlier principles. Maybe focus on financing.	Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured...").
24	Principle 5	This seems a logical place to make explicit mention of cumulative impacts and using best efforts to collaborate with other operators, engage with and encourage statutory authorities to conduct strategic environmental / cumulative assessment.	The reference to cumulative impact is now in the Applicability and specifically in the use of the Area of Influence concept (and definition). However, the Guidelines do not recommend any specific collaborative framework, as they have been redesigned to be much more focused on the actions specific to KBAs and to avoid being read as prescriptive. Therefore references to collaborative approaches have been deleted.
24	Rec 1.1	This recommendation applies to both existing and new business operations and could be simplified to: "apply the mitigation hierarchy".	This recommendation is now the opening statement for the Guidelines (see page 13). The sentence now reads "The KBA Partners recommend the application of the mitigation hierarchy (see Box 4) to any project with direct, indirect, or cumulative impacts on biodiversity."
24	Rec 1.2	"Empirical expert advice and best available scientific evidence" is a recommendations that applies to all principles, and not just in relation to restoration (maybe it's a principle in its own right). "Additional precautionary measures" – again, I'd suggest that applying the precautionary principle was a principle / recommendation that applies to all.	Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.
24	Rec 4.2	As per recommendation 1.2 – expert advice applies to all principles.	As the revised version of the document aimed at offering more focused guidance (the 15 Guidelines), the decision was to focus only on the long term financing of the mitigation measures and avoid adding too many additional conditions which would be considered in any case good practice in any situation and not only in KBAs.
24	Rec 4.4	Arguably, consideration of timing of works, forms part of the mitigation hierarchy and could form part of the section dealing with this. Whilst timing prior to works is highly preferable, it is not always necessary in all cases. Hence there are mechanisms / metrics to account for losses caused by delays in delivery.	This Recommendation is now embedded in Guideline 4 (Limits to impact restoration) and Guideline 5 (Limits to biodiversity offsets). In particular, Guideline 5 calls for "Offsets gains to be achieved before impacts occur or where offsets gains may take time to achieve offsets should be initiated with clear financing before impacts occur". It was decided not to introduce other elements for accounting for delays.
24	Rec 4.5	Capacity building is an important recommendation, but not sure it fits under principle 4. Also hard for a business to identify needs and deliver. Maybe this needs more thought on how to make this recommendation deliverable.	This is now expanded and included in the paragraph "Conditions for a successful implementation"
25	Rec 1.4	It is obviously a very good idea to have a set of principles for business for KBAs. The document is very clear and concise. I see that offsets are very much part of the principles. For me there seems to be a slight contradiction here as I would have expected that if KBA are important for biodiversity then they would be off limits for offsets. If KBAs are not so important for biodiversity then it's difficult to see their purpose. But I am sure that you have discussed this at length with IUCN members and so I won't have much to add to what you have heard already. For RSB, biodiversity offsets are not permitted under our standard, and I think that this may be the case for several other standards. This might put RSB in a difficult position as we have written KBAs into the standard and there may be some expectation for RSB to implement the guidelines for business. But we can review this when the guidelines have been finalised. So the RSB position would be that we would prefer to see KBAs as off limits for biodiversity offsets.	The Guidelines are now structured to indicate clearly that the priority is on Avoidance (Guideline 2) and Minimization (Guideline 3). Clear limits to both restoration of impacts (Guideline 4) and to Biodiversity offsets (Guideline 5) have been defined.
26	38	There are several instances in the introduction sections which talk about works 'around' KBAs. This wording is ambiguous. The concept of a project's Area of Influence (Aoi) is discussed later on page 12. Would it not be appropriate to bring the mention of Aoi forward in the document to the introduction? You can then say that the principles relate to any KBAs within a project's Aoi. Failing that, it would be good to provide a general radius which could be used in the screening process (e.g. 10 km)	The scope has now been changed to "businesses ... having and potentially having direct, indirect and cumulative impact on a Key Biodiversity Areas". More specifically, in the Guidelines we refer to the "... biodiversity element(s) for which the site qualifies as a KBA..." or the "element(s) triggering the identification of the KBA". Furthermore, the first paragraph of Section 3 "Guidelines for business activities" clearly defines the Area of Influence.
26	145	'Supply chains' are mentioned twice in the introduction section of the document (line 145 and line 194). However, there appears to be little reiteration in the implementation section. Perhaps the importance of supply chain impacts could be reinforced	Section has been deleted. However note that Section 3 "Guidelines for business activities" and specifically section "Applicability" states "The Guidelines can also be integrated into responsible sourcing policies for goods and services, the production of which could have direct, indirect and cumulative impacts on KBAs".
26	184	The document discusses identifying 'impacts' on KBAs. Should there not be a mention of suitable guidelines or data collection effort to inform the impacts identification/assessment process (in a similar manner to discussing the BBOP Standard for Offsets)?	Impact assessment is a key step for an effective implementation of the mitigation hierarchy. There are a number of good guidelines which would apply to any area (including KBAs). For this reason, the Guidelines do not make any specific reference to the impact assessment process.
26	190	This line mentions the 'biodiversity elements' of the KBA. This is worded better in the implementation section which discusses trigger species and supporting ecological context	Section on Applicability has been reworded.
26	191	The mention of positive impacts and enhancements is welcomed in this document. This could be emphasised more in the document	The reference to business potentially having a positive impact is now captured in Section 1 "Business and KBAs" separately from the section "Applicability" to avoid confusion.
26	226	Do the authors have any advice on how projects should operate around 'potential' or 'candidate' KBAs? Are these able to be identified at an early stage (i.e. once someone has proposed them but before they have been adopted as KBAs)?	This point has not been discussed.
26	Rec 1.3	Whilst acknowledging that different KBAs will benefit from different levels of protection and that different countries will have different approaches to KBAs in the planning/consenting process, should the statement in recommendation 1.3 not be strengthened? Given the criteria for selecting KBAs (threatened biodiversity; geographically restricted biodiversity; ecological integrity; biological processes; and, irreplaceability) then it would be hard to justify a project proceeding if it undermined the maintenance of the KBA trigger	The approach taken in the revised document (and now focusing on 15 Guidelines) is to focus on the situations when restoration and offsets are not acceptable (Guideline 4 and Guideline 5). This could read more weak than the previous version but effectively it enables a more clear specification of what type of impacts are now acceptable from a KBA conservation perspective.
26	Rec 1.7	When determining the pre-project baseline conditions, assessors should consider trends/threats related to the KBA and its trigger species. In addition, opportunities to enhance the KBA for its trigger/supporting species needs to be taken into consideration, as well as the future 'potential' condition of the KBA in the absence of the project	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
26	Rec 2.4	When determining the pre-project baseline conditions, assessors should consider trends/threats related to the KBA and its trigger species. In addition, opportunities to enhance the KBA for its trigger/supporting species needs to be taken into consideration, as well as the future 'potential' condition of the KBA in the absence of the project	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by " <i>pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)</i> ".
27	17	Here and elsewhere throughout the document, thank you for recognizing the important role of certification organizations/voluntary sustainability standards in maintaining Key Biological Areas (KBAs). We encourage retention of such references to these organizations in the document and we look forward to continued involvement in KBA policies as opportunities arise.	In the revised text and structure the reference to certification systems as drivers for the
27	105	We agree that KBAs can be managed by multiple effective means to conserve biodiversity. May we suggest adding after "Community Conserved Areas", "... and other approaches that consider ecological integrity and landscape conservation attributes, such as certified sustainable management."	Section has been reworded (see Page 10, Key Biodiversity areas, protected areas, and conservation priorities). Despite not referencing specifically ICCAs, the revised text hopefully is inclusive of all other conservation approaches.
27	121	Suggest inserting sentence: "Certification systems and voluntary standards that recognize indigenous rights may also serve a useful role in managing KBA's with respect to indigenous rights and interests."	Although this point is correct, we did not include it in this document as we specifically focused on how the "concept" of KBAs can be integrated in certification system without diving into other roles that certification system can have.
27	138	For consistency, we suggest inserting "certification organizations/voluntary standards" between "private companies" and "business"	Section has been deleted
27	189	SFI agrees with the notion that there is an important opportunity for businesses to contribute to KBA conservation and improved management. Please retain this element.	Retained. Now captured in specific Guidelines: Guideline 12 Additional Conservation Action; Guideline 13 KBAs as targets for offsetting impacts elsewhere; Guideline 14 Sharing biodiversity data.

27	205	<p>For businesses that operate at the landscape/seascape/watershed scale we suggest adding a bullet in the Implementation section at Line 205 as follows:</p> <p>"Businesses operating at landscape/seascape/watershed scales should design and implement activities in or near KBAs at those scales to maintain or enhance biodiversity elements of KBA's and additionally further consider Principle 5 in their operations".</p> <p>Our rationale for offering this suggestion is that many of the concepts brought forward in the document (e.g., Definitions section starting at Line 230) seem to be particularly focused on terrestrial ecosystems and site level assessments, rather than landscape scale.</p> <p>From the perspective of SFI, which works on sustainable forest management at a large scale, landscape scale approaches are often just as important as site specific considerations, and may allow businesses greater flexibility in meeting the conservation goals of KBA's.</p>	The reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
27	Principle 5	<p>For businesses that operate at landscape levels, such as those engaged in sustainable forestry, this principle is key and this helps address ecosystem function. SFI is supportive of this Principle, and in particular 5.2, which echoes language within our own forest management standard. We further suggest that the concepts reflected in 5.2 should be captured earlier in the document to the extent possible, as they relate to businesses such as those engaged in sustainable forest management. We have offered a specific suggestion at Line 205 (above) for your consideration.</p>	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
27	Rec 1.4	<p>In the United States and Canada, where SFI operates, the federal governments have not fully implemented Free Prior and Informed Consent (FPIC). But there are other valuable processes in place that benefit indigenous peoples in the absence of FPIC adoption by government. In each instance where "FPIC" is referenced, we suggest adding the following text: FPIC "...or other equivalent consultation and consenting approaches with local communities and Indigenous Peoples, including mandatory processes." (also applies to 2.7, 6.5 and cross cutting practices)</p>	We maintained FPIC as the key reference in IUCN's policies.
27	Rec 3.1	<p>In the case of newly declared KBAs, we suggest that the targeted assessment should be conducted jointly with relevant parties such as governments, indigenous groups and other stakeholders. Suggested edit: "When a newly declared KBA is declared the business and other stakeholders (e.g., governments, indigenous peoples, NGOs, communities) should work collaboratively to develop a targeted assessment".</p>	The decision was to replace Principle 3 and associated Recommendation with a more simple Guideline (Guideline 10 Responsibility for existing operations) which now focuses on the promotion of Additional Conservation Actions.
28	129	<p>Monitoring of KBAs by communities or government agencies could be more effective through engagement with businesses operating in or near KBAs. Such engagement could improve KBA management as well as business operations.</p>	Reference to Monitoring has been strengthened. Business are now called to monitor in line with KBA-wide monitoring efforts (See Guideline 6), and in the Conditions for a successful implementation (Section 3)
28	200	<p>Effective management of KBAs is an ongoing, iterative process. Along with the other standards and actions recommended in these Guiding Principles, businesses should work with other stakeholders on KBA management plans and evaluations, and share KBA monitoring information. [Perhaps these points overlap with 288-306, but they could be part of this list.]</p>	The specific point about sharing of monitoring data has been captured in Guideline 6 Biodiversity impact monitoring and Guideline 14 Sharing biodiversity data.
28	Rec 1.8	<p>Excellent points on monitoring and public disclosure. Specify that the monitoring and public disclosure should be annual or more frequent, posted on the business' website, and available for posting by the KBA manager (with considerations on confidential information).</p>	This recommendation has been replaced by Guidelines 6 (Biodiversity impact monitoring). The reference to independent auditing has been removed. With regards to the public disclosure, the revised version allows for "...considerations for confidential information". With regards to sharing of the data collected, the revised Guideline calls for the data collected to be made available to the KBA partners "...consistent with the Red List Policy on sensitive data access".
28	Rec 2.9	<p>Excellent points on monitoring and public disclosure. Specify that the monitoring and public disclosure should be annual or more frequent, posted on the business' website, and available for posting by the KBA manager (with considerations on confidential information).</p>	This recommendation has been replaced by Guidelines 6 (Biodiversity impact monitoring). The reference to independent auditing has been removed. With regards to the public disclosure, the revised version allows for "...considerations for confidential information". With regards to sharing of the data collected, the revised Guideline calls for the data collected to be made available to the KBA partners "...consistent with the Red List Policy on sensitive data access".
29	14	<p>Calling the document Guiding principles immediately suggests that it is a certification standard (many of which refer to principles), this may create a false perception and deter people from following it.</p>	Title and scope has changed based on comments received.
29	35	<p>Avoid use of the word corporate which is derived from incorporated as incorporated companies suggests large multinationals, use 'business' instead</p>	Word "corporate" removed throughout the text
29	39	<p>Suggest using "minimal requirements" "minimal operating principles/procedures" instead of standard to avoid confusion that might arise (see first comment on lines 14-67) between actual certification standards and the KBA guiding principles and recommendations.</p>	Language has been revised to avoid confusion. Specifically, this section has been deleted.
29	56	<p>There are now 89 EPFIs</p>	This reference has been deleted.
29	66	<p>Use of the word 'module' is inappropriate here, use guidance instead</p>	Word "Module" has been abandoned.
29	106	<p>This should refer to the type of management (community management) rather than a type of area (ICCA). Or add "ICCA that do not meet the IUCN definition of protected areas" this is because most ICCAs are protected areas already. Alternatively "areas managed by local communities and indigenous peoples that are not designated protected areas"</p>	This section has been deleted.
29	107	<p>This should read 'or have any form of management regime'</p>	The section has been revised.
29	112	<p>This section doesn't fit well with the remaining text in this section. It's not clear how the values of community and co-management are relevant in this context. One of the concerns that I have heard and areas of confusion that remains is that there is a perception of KBAs as being new areas and that it is a process that does not dovetail with IFCPS6, making clear that KBAs are in part a formalisation of existing approaches and demonstrating how the approach is already supported by IFC PS6 would be a useful inclusion here. In addition, this section is about What are KBAS not about "The role of indigenous peoples in KBAs" so most of the text is not relevant to this section</p>	The section has been shortened but maintained as it was felt it was important to note the connection between people and biodiversity (and among people in general, nature dependent communities including indigenous peoples). A section of the on line guidance document will discuss this topic in more details.
29	121	<p>Is there a need to reference statements like this? If so provide reference to that "recent analyses" which I assume its Barnes et al.</p>	Statement has been deleted as too specific and supported only by 1 study.
29	171	<p>Environmental impact assessment consultancies are a key audience here also.</p>	Section has changed - reference to specific target audiences is no longer there.
29	182	<p>"They should be the minimum standard" the language used suggests that this is actually a standard that will become soft law. This will concern many in the private sector. Consider an alternative wording.</p>	The Guideline in this version (but also previous one) are designed as voluntary tool and therefore their use will depend on the level of commitment of the user. The KBA partners confirmed that from their perspective "[t]hese guidelines are recommended minimum requirements for business operations having direct, indirect and cumulative impacts on a Key Biodiversity Areas, unless the national or local law is more stringent, in which case the law shall prevail" (see Acknowledgment section).
29	192	<p>This uses the language of large-scale mining operations, it would not be compatible for example with agriculture, procurement, tourism etc.</p>	Although this is correct, the language has been retained as it expresses very clearly the concepts that the KBA Partners wanted to convey, which is of a continuous implementation of the guidelines.
29	194	<p>Against refers to module, module in what? A broader set of guidance? – check use of module throughout document</p>	The word "module" has been abandoned.
29	197	<p>Refer to business not company, not all businesses are incorporated</p>	Changes done.
29	206	<p>Seems strange to jump straight to offsets when there is as yet no mention of avoidance and the mitigation hierarchy, suggest you refer to offsets as part of a broader reference to the need to implement the mitigation hierarchy Need to specify that you mean 'Biodiversity' offsets</p>	Section has been deleted. Offsets and their design are now only included in Guideline 5 which builds on the IUCN's Policy on Biodiversity Offset.
29	213	<p>The sentence "and demonstrates good faith in not working to circumvent existing conservation laws or hinder the passage of new conservation legislation at the national or local level" is a bit cryptic and needs more clarity</p>	This sentence has been deleted.

29	218	Need to specify that commercial users can access data through IBAT and then go on to talk about non-commercial use.	This comment has been shared with the IBAT Partners which were in the process of revising the fee structure.
29	225	Not clear what 'supporting good governance even if it is absent' means. Cannot support something that is not there.	This sentence has been deleted.
29	229	This is a key point to address – how to address the unknown KBAs in the adoption of this guidance. How to maintain up to date information and how to respond when a new KBA is identified near a project site	This paragraph has now been deleted as it wasn't useful in relation to the implementation of the Guidelines. Guideline 10 now defines how a business should deal with impacts related to business operations in newly defined KBAs.
29	230	Generally these should be referenced to existing sources e.g. the BBOP glossary.	Done.
29	234	Definition one should be "Mitigation Hierarchy" (now 6) so that then all the definitions below make sense and the context has been set. This should read, 'avoidance, minimisation, restoration and biodiversity offsetting measures'. In addition, suggest definition is the first section of this chapter instead of applicability as the latter already uses some definitions	Change made.
29	241	Not just 'projects', business operations	Now definitions are included in the Glossary and based on widely accepted documents.
29	Goal	The overarching goal reads as if you are seeking funding from companies for KBAs. Also, what does 'contributes to the supporting social and ecological context' mean?	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.
29	Principle 2	Why use net gain language here and not in principle 1 which requires a higher level of 'protection' Is there a need for further guidance to establish what non-KBA trigger biodiversity are considered to be important components of the site? This is perhaps overly ambitious	The structure of the document has completely changed and in particular the Guidelines instead of defining when an offset would be possible (which is the reasoning behind the slight difference in Draft 2 between Principle 1 and Principle 2), define when the offset would NOT be possible. In short, this is no relevant any longer.
29	Principle 3	This is going to be challenging to implement and is likely to cause significant concern within the private sector. Furthermore, going back and establishing historic baselines and responsibilities for impact may be impossible in some cases. These challenges need to be acknowledged in this section. Not clear why this only applied to ACAs and not impact mitigation, given that impact mitigation is an iterative process that continues throughout the project lifecycle. I would have thought the point would be to establish baselines and then evaluate existing biodiversity management plans in line with principles 1 and 2.	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
29	Principle 4	This principle is far broader than KBAs and therefore perhaps not needed in this context. Otherwise this guidance will duplicate other business performance standards. These recommendations should be embedded in those under the other principles that refer to mitigation measures such as offsets	The revised structure of the document addresses this point as now only 15 Guidelines have been distilled.
29	Principle 5	This principle is broader than KBAs and about how to appropriately assess impact. Therefore perhaps this should not form a principle but a recommendation under the other principles where you could link to further guidance on assessing impacts at a landscape/seas-cape level	This Principle has been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
29	Rec 1.8	I suggest a shift in tone here. Move from business must contribute to business have the opportunity to contribute to the monitoring of KBAs through ensuring their monitoring and reporting is aligned with best practice for KBAs and reflecting local KBA practice. Demonstrating effective implementation of business policies will be important to a range of stakeholders e.g....	The revised Guideline stresses that "...it is crucial that ..." rather than "The business establishes ..." used in Rec 1.8
29	Rec 2.8	This is a confusing sentence. Further information on why this is not always possible (and therefore acceptable to not achieve) would be helpful. This suggests that if the impact is so great it is not really possible which is really counter the premise of this guidance	This recommendation is now part of Guideline 5 and worded in more clear terms "Offsets for residual impacts in KBAs should achieve Net Gain on the trigger element(s) affected by the project...". The Guidelines do not refer anymore to impacts on non KBA trigger element(s).
29	Rec 3.1	Need to specify current and future impacts as it would be largely impossible to assess historic impacts	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However, they did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
29	Rec 5.6	Consider adding and influence joint venture partners where possible This seems a bit out of place here – are the activities of contractors not considered as part of standard impact mitigation. Again relevance to landscape level assessment of impacts on KBAs not clear	Correct. The placement of this recommendation under this Principle wasn't the best position. Since then, the structure has been changed and this recommendation is now included in the "Applicability" section which refers that "The Guidelines can also be integrated into the companies' responsible sourcing policies for goods and services...."
29	Rec 1.10	The intended conservation outcomes for other biodiversity elements (non KBA trigger elements) is NNL or preferably Net Gain. This is unrealistic in the extreme and would be a de facto block on any operations.	This recommendation has now been removed.
29	Rec 1.4	Number 2 is very unclear – it seems to suggest that offsets should already be underway and delivering results but also suggest that if no results for more than 10 years there are some further conditions. I think I follow this but it needs clarity. I would also separate out the section on trust funds to a separate point as this could easily be lost otherwise and is an important point.	Recommendation 1.4 is now replaced by Guidelines 5 and 7 (Limits to biodiversity offsets; Long-term financing of the mitigation measures). The structure has been turned around: Guideline 5 is now about "limits to offsets" which are based on the recently approved IUCN's Policy with additional 4 situations specific to impacts on KBAs. Guideline 5 reaffirms that FPIC should be obtained in order to proceed. Guideline 5 reaffirms that Offsets should follow IUCN's Policy. Guideline 7 replaces the reference to how to manage funds. The reference to third party has been deleted as it was recognized to be too prescriptive.
	Rec 1.4	Make clear that 'in extraordinary circumstances' only refers to offsets and not the rest of the MH in the summary table In order for there to be a net gain, and ideally no offsetting – should this principle not also apply to ACAs	The structure of the Guidelines is quite different now. The Mitigation Hierarchy is now referred to as an overarching recommendation. The 15 Guidelines developed by the KBA partners are then designed to "support the effective implementation of the various steps in the mitigation hierarchy ..." (page 13).
29	Rec 1.4	Number 2 is very unclear – it seems to suggest that offsets should already be underway and delivering results but also suggest that if no results for more than 10 years there are some further conditions. I think I follow this but it needs clarity. I would also separate out the section on trust funds to a separate point as this could easily be lost otherwise and is an important point.	Comments accepted. The Guideline on offset is now more simple and refers to the IUCN's Policy for what regards the design and implementation mechanisms. The section on trust funds/financial security is now a separate Guideline.
29	Rec 1.5	This reads like a funding request. Suggest softening the language a little 'where possible'...	Language has been softened and concepts re-worded. This Recommendation is now captured in Guideline 12 (Additional conservation action) and Guideline 13 (KBAs as targets for offsetting impacts elsewhere).
29	Rec 1.7	Shouldn't the baseline that is considered be not just pre-project condition but the counterfactual?	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".

29	Rec 2.4	Need for a counterfactual? Could also combine this with 2.9 on monitoring.	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
29	Rec 3.2	Remove the word 'residual' unless remediation (restoration/offsetting of impacts) is considered more appropriate than for new projects as in principle 1.	This Principle and related recommendations have been replaced by Guideline 10 (Responsibility for existing operations). The 12 KBA Partners considered that grandfathering was not going to be aligned with the goal of the KBA Standard (the global persistence of biodiversity). However did recognize that some of the elements included in Draft 2 (Recommendations 3.1. to 3.4) might have been too prescriptive. The Guideline also clearly indicates that extensions and future projects should be treated as new project (hence should follow all the Guidelines).
29	Rec 4.2	Biodiversity experts should advise on how to manage impacts, rather than managing directly.	Reference to biodiversity experts has been deleted.
29	Rec 4.4	The line 'Preferably remediation measures should be implemented and conservation outcomes demonstrated prior to impacts occurring' needs to refer explicitly to offsets as I don't believe it can apply to restoration.	The KBA partners confirmed that, given the uncertainties of restoration outcomes, this principle (demonstration prior the impacts) should also apply to restoration (Guidelines 4 calls for "restoration potential ... is demonstrated before project activities commence".
29	Rec 6.1	Does this relate to all impacts or those associated with any impacts on KBAs – not clear.	The reference to stakeholder and right holders is now integrated in specific Guidelines and other sections (such as Conditions for successful implementation).
29	Rec 6.5	Change to 'depend on for land and resources'	The recommendation has been removed. Editorial comment is no longer valid.
29	Rec 6.6	Sentence unclear – is this not repetitive of 6.4.	This specific requirement has not been included in the revised Guidelines.
30	291	Impacts sometimes may be far off-site (think of coastal zones for businesses operating in the watershed). Off-site stakeholders are not very explicitly mentioned, may be victim of negative changes while the benefits of compensation remain with on-site stakeholders.	This step is now mentioned under "Conditions for successful implementation" and the word "inclusive" will hopefully address the different origin of stakeholders. Furthermore, a Guideline on Participation and consultation has been now added (See Guideline 9).
30	291	I like (of course) the provisions for stakeholder involvement in decision making, but that should also include advice to the business itself about business plans, not just the KBA only as these cannot be separated in this regard.	The advice is meant to business in their business planning and decision making. Hence this point is now listed under "Conditions for successful implementation" by business.
30	303	In the cross-cutting activities you may consider mentioning flexible/adaptive management, of course in relation to monitoring.	A specific Guideline on Monitoring has been included (Guideline 6, Biodiversity Impact Monitoring).
30	Rec 1.2	<ul style="list-style-type: none"> It states that Principle 1 is especially for new projects. But why is there then so much about restoration? There is nothing to restore when the project still has to start, or is it restoring existing already degraded environments, in which case it is more of a compensation kind of thing. Maybe Principle 1 could be for all projects? the World Commission on Environmental Law goes a bit further nowadays than the Precautionary Principle. They state: "In dubio pro natura". <p>Restoration should be based on positive results of restoration activities in similar environments. What if such examples do not exist? Pressures may be high then to start with the business anyway, and asking not to do the business may be unrealistic in the political/socio-economic context. Maybe we could ask for a strong protocol on restoration activities, closely monitored by independent experts and with a commitment of the enterprise to adapt when results indicate the need?</p>	Rec 1.2 is now replaced by Guideline 4 (Limits to impact restoration). The word "calculation" has been replaced by estimates. The reference to empirical expert advice has been retained as the 12 KBA partners felt very strongly that this type of expertise is essential to get a good plan in place. Furthermore, the 12 Partners decided to retain the reference to the need to demonstrate the restoration potential before project activities commence. In addition, the Partners decided to add another limitation: the application of the limits to offset also to restoration.
30	Rec 1.7	Monitoring is asked against a "static" baseline. What does static mean in this respect. I think that the baseline should also state the ongoing trends at that moment.	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
30	Rec 5.6	Business should also be kept responsible for impacts of adventurers attracted by the new business opportunities, e.g. bars and prostitutes coming in to entertain the workers, hunters to provide bush meat to the workers, etc...	The document maintains a generic applicability level hence no specific examples are made. However it is likely that the examples offered by the reviewers could be "indirect" impacts (depending on the situation).
30	Rec 6.4	Compensation for local communities and indigenous groups often are of a very short duration, as such groups have not a culture of managing large sums of money or whatever. There should be an institution dealing with that for the longer term.	This issue has been now eliminated from the scope of the Guidelines.
31	Rec 6.3	In certain instances there is conflict in usage patterns of local/traditional communities with that presence of biodiversity. For traditional practices at harvesting certain species by these communities, in a certain protected area, may today be unsustainable due to depleting numbers. Under such instances the protected area management may desire to stop such traditional practices. Businesses could have been hitherto supporting communities in such harvest, and will require to realign their business operations in line with the management of such protected area, thereby, negatively impacting on the accesses by communities. In light of such situation it is advisable for Principle 6-Recommendations 6.3 could be framed as- "The actions taken to implement the mitigation hierarchy do not have negative impacts on rights holders and stakeholders to the extent that they are in synchronization with the stated management plans for a protected area"	The need to be aligned with any priority and requirement of a protected area is now stated in one of the Conditions for a successful implementation. This particular Principle and associated Recommendations have been deleted and haven't been replaced by equivalent Guidelines as the KBA partners felt it was not within their scope.
32	16	One of KBA's objectives is to "inform and influence public policy and private sector decision-making". Here the target end users need to reflect this, as of now it doesn't clearly talk about influencing public policy.	The end users of the 15 Guidelines are not necessarily the same as the target audiences of the KBA Standard.
32	82	Should 'richness' or 'abundance' of species in the biome be also included here?	The text mentioned by the reviewer has been deleted to reflect with more precision the KBA official definition.
32	90	Same comment as above: Should 'richness' or 'abundance' of species in the biome be also included here, as a criteria?	The text in the document is a summary of the KBA Standard which has been established and already approved.
32	130	Add reference about the assessment.	The specific sentence has been deleted. This concept is now captured in Section 3, under "Conditions for successful implementation".
32	132	A one-liner example with the cost comparisons would help in understanding the gravity.	The specific sentence has been deleted. This concept is now captured in Section 3, under "Conditions for successful implementation".
32	239	What about impact due to change caused by an unplanned intervention? Is that covered under another head/definition?	Clear definitions of different type of impacts are now in the Glossary.
32	254	If the unavoidable biodiversity loss is a threatened species, what is the mitigation plan?	This point is now addressed by Guideline 5 Limits to biodiversity offsets.
32	Principle 6	Consider adding this: 'Business to give priority to Nature based solutions' (for example, downstream inhabitants/businesses to pay upstream inhabitants to maintain water quality)	The Principle has been dropped.
33	69	Page 8-9: While we understand that mapping and defining KBAs is ongoing, it would be useful here to provide some indication of the area covered by KBAs, average size, etc. (at least based on current data), with a link to a map when ready. This would help clarify the expectations of business with regard to safeguarding KBAs, and the associated potential financial and operational impacts, and better encourage voluntary adoption of the guidance into their environmental and social assessment and management policies and procedures.	The NEW Section 2 "More about KBAs" now includes some quantitative facts about KBAs. However, it should be noted that this data is continuously evolving due to the continuous effort to expand the sites identified as KBAs.
33	134	This 'What are KBAs and how are they identified' section would benefit by including a note that helps business understand how they can contribute to data collection to strengthen KBA designation, delineation and management, as is detailed in the recently published 'Guidelines for the appropriate use of the IUCN Red List for business'. This would both improve the KBA designation process and ultimately ensure that business decision-making is based on the best available information. Alternatively, text and guidance to this effect could be included in the 'An emerging need from the end-users' or 'Implementation' sections. This guidance should also be detailed somewhere in the principles, or could be included in the 'cross-cutting practice' on 'Transparency and Integrity' or perhaps best as an entirely separate cross-cutting practice.	This suggestion was taken on board and now each Guideline is complemented by text focusing on "How can the World Database of Key Biodiversity Areas help?"
33	195	A note could be made here regarding the role of governments, and the hope that by embedding and advocating for this guidance, business can support better landscape-level planning and processes such as Strategic Environmental Assessments.	A separate fact sheet focusing on the role of government is now available through the web based resources.
33	Goal	'Ecological context' needs to be defined, but would be better termed 'ecological processes' as per the International Finance Corporation's Performance Standard 6 (PS6). Also relevant to Principle 1	The structure has now changed to 15 Guidelines. The Goal and Principles have been deleted as the 12 KBA Partners (the authors) realised that the structure proposed in Draft 2 was too prescriptive.

33	Principle 1	Suggest reference be made to the 'critical habitat' and 'natural habitat' definitions of PS6 here to ensure cohesion with actions already underway to adhere to PS6 guidance?	There are differences between the KBA Criteria and the Critical habitat Criteria. These will be explained in more details through the web based resources.
33	Principle 2	Suggest reference be made to the 'critical habitat' and 'natural habitat' definitions of PS6 here to ensure cohesion with actions already underway to adhere to PS6 guidance?	There are differences between the KBA Criteria and the Critical habitat Criteria. These will be explained in more details through the web based resources.
33	Principle 4	In order to further support this principle, and ensure that restoration or offsetting is only considered IF technically achievable and the project is not given the go-ahead before this is clear, suggest reword: "Business carries out early scoping and assessment of potential impacts to plan all mitigation actions before measurable impacts take place, and tests and sets aside funds for any required restoration and offsets as a precautionary action to demonstrate that successful outcomes are both technically and financially feasible."	Principle 4 and specifically the aspects (Rec 4.1 and Rec 4.4) are captured in Guideline 7. Recognizing that principle 4 and other recommendations were too prescriptive in terms of how funds for impact restoration and offsets were too prescriptive, the language is focused on the desired results (Guideline 7 reads "Sustainable and sufficient financing for all the mitigation measures... is secured..."). Furthermore, Principle 4 Limits to impact restoration and Principle 5 Limits to biodiversity offsets also refer to "expert advice" and testing the effectiveness of the plans.
33	Principle 6	Suggest reword to make relationship with KBAs clearer and more specific: "...local communities and indigenous peoples associated with living in and/or dependent on the KBAs"	The Principle has been dropped.
33	Rec 1.10	Suggest insert the following "and responds to change (including changes linked to climate change and socio-political context)..."	This recommendation is now highlighted as a Conditions for successful implementation (page 11). However socio-political context has not been integrated explicitly but reference has been now made to the difference governance models that KBAs may be subject to.
33	Rec 1.5	This section could highlight more the role of governments and cooperation/support at this important level.	The role of government in the conservation of KBAs is now captured in a specific section of the web based resources.
33	Rec 1.7	We question whether "the pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)" is always available, so perhaps this recommendation should start, " Wherever possible, the potential... "?	This is now addressed in Guideline 1 (Project biodiversity baseline). Static has now been replaced by "pre-project condition of the biodiversity element(s) for which the site qualifies as a KBA (including the supporting ecological context)".
33	Rec 1.8	It is good to note that where KBAs are in or near to ICCAs, business should support community-based monitoring of KBAs, but could it not also be noted that where KBAs are in or near to government protected areas, business should also support monitoring there too?	This recommendation has been replaced by Guidelines 6 (Biodiversity impact monitoring). Furthermore, reference to the role of communities in monitoring is now strengthened in the Conditions for success paragraph (page 11-12)
33	Rec 2.1	These are essentially the same as for Principle 1, though with some deliberate and other potentially accidental variations (e.g. see suggested revision for rec. 2.6 below), which makes this whole section repetitive and hard to follow. Could Principles 1 and 2 be combined, or reference made back to recommendations that are the same for both?	The structure has now been changed and the confusion addressed.
33	Rec 2.6	Suggest should read: "Expert advice is essential to determine the feasibility and effectivity of restoration plans." (if aiming to be in line with rec. 1.2)	The recommendation is now merged into Guideline 4 and Guideline 5.
33	Rec 3.1	Suggest reword: "...there should be a targeted and independent expert assessment of the impacts of the existing operations."	The decision was to replace Principle 3 and associated Recommendation with a more simple Guideline (Guideline 10 Responsibility for existing operation) which now makes no reference to the assessment but focuses on the outcomes (ACA will lead to conservation benefits).
33	Rec 4.1	Suggest define "project life cycle" in Definitions section.	The recommendation text has been removed. In any case the term "project life cycle" is now spelled out in the Applicability section.
33	Rec 4.1	Suggest add "...throughout the project life cycle, and where necessary beyond , is planned from the outset..."	The recommendation text has been removed.
33	Rec 4.4	Suggest either remove the word "Preferably" or clarify as follows: "... Preferably-Where impact is envisaged on the biodiversity element(s) for which the site qualifies as a KBA, remediation measures should be implemented and conservation outcomes demonstrated prior to impacts occurring."	The wording in Guideline 4 and Guideline 5 now reflecting this concept are much more direct in accordance to the comment.
33	Rec 5.1	Should read: "...landscape-, watershed- or seascape-scale."	This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs. However, note that the Area of Influence definition has been adopted which refers also to "... impacts on different locations; ...indirect impacts on ecosystem services upon which the affected communities livelihoods are dependent".
33	Rec 5.3	Suggest reword: "...who are also involved in conservation, land and/or resource management..." and "...coordinated investment, land use planning and management,..."	This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
33	Rec 5.3	Could give some examples here, such as Strategic Environmental Assessment, or otherwise detail in introductory section or perhaps Stakeholder Engagement cross-cutting practice section.	This Principle and related recommendations have been deleted and the reference to landscape, watershed and seascape approach is no longer included in the Guideline as this is part of best practices that should be applied in any situation and not specifically to managing biodiversity impacts on KBAs.
33	Rec 6.1	Define "rights holders and stakeholders" – are these the "local communities and indigenous peoples associated with the KBAs" as in Principle 6? Should also use consistent terminology throughout.	The reference to stakeholder and right holders is now integrated in specific Guidelines and other sections (such as Conditions for successful implementation).
33	Rec 6.4	Should read "socio-economic". And should compensations also be independently facilitated?	The Recommendation has been deleted.
33	Rec 6.5	Suggest reword: "For new projects impacting KBAs that indigenous peoples have access to, use of and depend on for land and resources, the business will obtain Free, Prior and Informed Consent (FPIC) for all project activities."	This is a highly complex issue and for this reason a separate web based resource will provide links with reputable and specific guidance. However, the KBA partners decided to maintain the reference to obtain FPIC when indigenous peoples and local communities are impacted (in the section about "Conditions for successful implementation" and "Guideline 5).
33	Rec 6.7	For existing projects, suggest could make stronger: "...In the absence of support, the business will take and make public remedial actions."	This recommendation is now more clearly expressed under Guideline 5 Limits to Biodiversity Offsets ("The development and offset should both have obtained the free, prior and informed consent of any impacted local communities").