

Concept note WS4: Policy Coherence

BELLONA FEEDBACK

We welcome the Commission's concept note as a constructive starting point for structuring discussions on policy coherence. The interface-based approach is useful to organise this complex policy landscape and highlights important cross-cutting challenges, particularly around claims, governance, and interactions with existing EU frameworks.

At the same time, we consider that several **foundational issues remain insufficiently addressed**, which risk undermining both the credibility and coherence of the framework. As such, our feedback focuses on key areas where further clarification and stronger guardrails are needed.

1. FOUNDATIONAL GAP: LACK OF DEFINITIONS, USE CASES, AND CLAIMS FRAMEWORK

One of our main concerns is the **absence of a clear definition of nature credits, their use cases, and associated claims**. While the concept note acknowledges different potential roles (e.g. contribution-based vs. compliance-adjacent use), these distinctions remain conceptual and are not operationalised.

We are particularly concerned about the **"methodology-first" sequencing** currently being pursued. A similar approach in the CRCF has led to ongoing uncertainty regarding use cases and claims, despite progress on methodologies. Replicating this pathway risks embedding structural weaknesses into the nature credits framework.

Without clear answers to:

- *What nature credits are for,*
- *Who can use them, and*
- *What claims they can support,*

there is a high risk that:

- inconsistent interpretations will emerge across policy contexts, and
- environmental integrity will be compromised in practice.

We therefore strongly recommend that **use cases and claims frameworks be defined upfront**, as a precondition for methodological development. In any case, the methodologies will need to be tailored to specific end-uses or claims.

2. TRANSPARENCY WITHOUT CLAIMS CLARITY IS INSUFFICIENT

The concept note rightly emphasises **accounting, traceability and transparency** across instruments. However, without a clear and enforceable framework on: **what claims can be made, how they can be communicated, and in which contexts they are valid**, transparency risks becoming **procedural rather than substantive**.

In particular:

- The same credit could be interpreted differently across regulatory, financial, and corporate contexts.
- Transparent data does not prevent **misleading narratives or misuse**.

We therefore stress that: **robust claims governance must precede or accompany transparency requirements**.

3. STRONG OPPOSITION TO OFFSETTING-LIKE USES AND CLAIMS

We are firmly opposed to any use of nature credits that substitutes for legal obligations, justifies environmental damage, or creates equivalence between harm and restoration elsewhere.

In this context, we highlight the approach taken under the **Empowering Consumers for the Green Transition Directive**, which explicitly prohibits claims based on offsetting greenhouse gas emissions (e.g. "climate neutral", "carbon compensated"), and strongly recommend applying the **same principle to nature-related claims**, for example: *prohibit the making of claims that a product, service or activity has a neutral, reduced or positive impact on nature, based on offsetting or compensation mechanisms*.

Nature credits should:

- **support positive contributions,**
- **not be used to 'neutralise' or obfuscate negative impacts,** and
- **never function as a justification for continued degradation.**

This principle should be explicitly reflected in the concept note and in future policy development.

4. RISKS RELATED TO STACKING, BUNDLING AND INTERACTION WITH CRCF

We recognise the value of exploring complementarities between nature credits and the CRCF Framework. However, the proposed interaction, particularly through stacking and bundling of carbon units and nature credits, carries significant risks and must be carefully managed.

Combining carbon units with nature credits may create the impression of **enhanced climate performance**, beyond what is actually achieved in terms of carbon removal. This risks **overstating impact, blurring** the distinction between fundamentally **different environmental outcomes**, and **masking trade-offs** between carbon and ecosystem

integrity. More broadly, such approaches may also increase the risk of double claiming of outcomes.

In this context, biodiversity co-benefits under the CRCF should not be rebranded or monetised in ways that distort their original role. Similarly, nature credits should not enhance or “upgrade” the perceived climate value of carbon units.

To safeguard environmental integrity and policy coherence, we urge the Commission to:

- **prioritise strict separation of claims** between carbon and biodiversity outcomes,
- ensure **clear boundaries between frameworks** to prevent overlap and double claiming, and
- assess whether certain forms of stacking and bundling should be **restricted or excluded**, rather than conditionally accepted.

At the same time, a more appropriate approach may be to consider biodiversity performance as a **precondition** rather than an add-on. In this regard, it may be advisable to expect nature credits as a prerequisite for the generation of carbon farming units from the CRCF.

5. GOVERNANCE AND COORDINATION QUESTIONS

We would welcome clarification on institutional coordination, in particular:

- whether there will be **formal links between the CRCF Expert Group and the Nature Credits Expert Group**,
- how consistency in claims, accounting and governance will be ensured across both processes.

Stronger coordination will be essential to avoid fragmentation and conflicting approaches.

6. NATURE AS A COMPLEX AND NON-REDUCIBLE CONCEPT

Finally, we underline a more fundamental point: **“Nature” is inherently complex, multi-dimensional, and context-specific**, which unlike carbon, cannot be reduced to a single metric or unit. This raises important implications:

- any crediting approach will necessarily capture only **partial representations of ecosystems**,
- there is a risk of **oversimplification and misrepresentation**, and
- strong safeguards are needed to ensure that credits do not create a false sense of equivalence or completeness.

Reinforcing the need for clear definitions, limited and well-defined use cases, and strict claims discipline.