

Recommendations for the EU Roadmap towards Nature Credits

Ecosystems provide a wide range of goods and services to society that are indispensable to life on earth like carbon capture, pollinating crops, providing liveable lands, water provisioning and purification. Biodiversity and ecosystems are therefore considered to be material by the majority of chemical companies that published CSRD aligned reports so far. Being aware of these impacts and dependencies linked to biodiversity and ecosystems, Cefic published in 2013 [a guide](#) for chemical companies helping them to get started in integrating biodiversity and ecosystem services in their strategy and daily operations.

The chemical sector is a broad sector covering a wide range of operations part of global material flows, and a key part of long value chains. Biodiversity measures are implemented at different stages of the value chains, and although the value chains are global, biodiversity measures and solutions are very much company and location specific.

The need to integrate biodiversity considerations into the chemical industry's business strategies was one of the key conclusions of the EU policymakers, NGOs, scientists, and chemical industry present at the Cefic event held on the topic on 19 May 2022 as input for the dialogues of the COP 15 where the Kunming-Montreal Global Biodiversity Framework (GBF) was adopted. The EU Roadmap towards Nature Credits is addressing the call under the GBF for substantially increasing financial flows from all resources, including through innovative finance, by rewarding nature-positive action via nature credits.

Maintain a pragmatic approach supporting voluntary initiatives

To increase the success of implementation we emphasise the need to develop the nature credits as a voluntary approach which can be used by companies and investors to enhance nature-positive actions. The objectives and the intended effect of the Nature Credits needs to be clearly outlined and the concept should support the current companies' concrete biodiversity work. There is a clear need to develop the approach in a pragmatic, practical, science-based way without creating a lot of additional requirements which might be perceived as a burden without actual benefits.

Take into consideration existing approaches and create clear guidelines for new approaches

A lot of corporates voluntarily apply approaches which help them to address nature and biodiversity in their business plan. In the communication (COM(2025)374) of the Commission regarding the roadmap, a reference is made to a database listing 50 initiatives (e.g. BASF Agricultural Solutions), as well as to global initiatives (e.g. WEF, TNFD and SBTN). Other initiatives which are used and developed in cooperation with the industry are not yet listed, such as the application of the Water Stewardship principles. Therefore, we suggest complementing the mapping by reaching out to industry to identify approaches already in place. To enable an objective assessment of the tools, a potential allocation of nature credits, and the development of additional tools, clear guiding principles should be developed. These should also cover the assessment of the actual contribution of implemented approaches to the targets set under the GBF.

Continue to work on governance and standards

Robust governance frameworks and clear, transparent standards are essential to maintain credibility and market integrity. Carbon markets initially suffered from unregulated and fragmented credit verification, which led to issues

with double counting, poor-quality credits, and lack of trust among stakeholders. The emergence of regulatory bodies and standardisation efforts have shown that institutional oversight greatly improves transparency, stakeholder confidence, and overall market reliability

Cherish holistic and multi-metric approaches

Carbon credit projects increasingly incorporate landscape, ecosystem, or habitat-level approaches. They blend carbon, biodiversity, and other environmental metrics. Such an holistic approach can help mitigating risks like monoculture projects. It can also improve reporting and accountability and the delivery of more meaningful ecological outcomes. Nature credits can benefit from merging various indicators for ecosystem health and resilience, providing flexible business cases that attract broader investments and avoid narrow, siloed objectives.

Combine voluntary and policy incentives

Voluntary credits alone rarely scale to the level required for significant ecological impact. Effective nature credit markets should be supported by policy incentives and active public-private cooperation. Carbon markets show that relying only on voluntary mechanisms limits scale and impact, whereas combining market-driven innovation with policy support can mobilise much larger pools of capital and deliver durable results.

Foster integrity and community involvement

Lessons from carbon markets demonstrate the importance of integrity and transparency. As nature markets mature, it is clear they need to be underpinned by strong foundational principles to ensure legitimacy. We welcome the EU's observation on the need to prioritise *'clear standards, scientific rigour and reliable governance so that certified outcomes are robust, measurable and resilient to reputational risks'*. Ensuring the genuine additionality of environmental benefits and the inclusion of local communities is vital. Nature credit markets must prioritise real ecological gains and embed mechanisms for local stakeholder engagement, grievance redressal, and co-benefits.

Address measurement challenges and long-term value

The challenges of measurement, verification, and permanence are especially acute for biodiversity and ecological outcomes. Successful carbon markets gradually improved their measurement rigor and verification procedures. Nature credit markets need transparent frameworks for tracking ecological outcomes and for aligning financial returns with long-term ecological health, such as through new asset classes like nature shares and dividends.

Keep the process inclusive

We welcome the EU's establishment of an Expert Group on nature markets, as well as the outreach to make sure that the European roadmap is informed by perspectives from farmers, land stewards, IPLCs and stakeholders across the value chain. We believe this is the best way of ensuring that outcomes reflect and balance the needs of people –in terms of food and livelihoods- and nature.

In summary, Cefic is supporting the European Commission's initiative for a roadmap towards voluntary nature credits and is willing to further exchange experiences and insights based on the sector's best practices.