

## **Claims Rules**

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accountingfornature.org

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Approved for release	Accounting for Nature Ltd Copyright: © Accounting for Nature Limited 2023 Contact: <u>feedback@accountingfornature.org</u>	

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Professional legal, financial and other expert advice should be sought by users of the Accounting for Nature<sup>®</sup> Standard and/or associated documents as required and as relevant for the intended use.

#### DATA LICENCE AGREEMENT

By submitting a new Environmental Account registration, Proponents agree to AfN's <u>Data License</u> <u>Agreement</u> which sets out the terms on how the information and data contained in your application, including any ancillary information and data, is used by AfN.

#### **PRIVACY STATEMENT**

AfN is committed to protecting participant privacy in accordance with its Privacy Policy.

#### ACKNOWLEDGEMENT

From 2008 to 2018, the Wentworth Group of Concerned Scientists developed the Accounting for Nature® model. The model sought to establish a practical, affordable and scientifically robust methodology for creating a common unit of measurement to describe the condition of environmental assets and measure any change in the condition of those assets over a period of time.

From December 2018, the Wentworth Group will not take part in any further development of, or application or implementation of, the Accounting for Nature<sup>®</sup> model. This will be undertaken by AfN. The Wentworth Group is not responsible for the use of or implementation of the Accounting for Nature<sup>®</sup> model or any associated services provided by AfN.

*Glossary of Key Terms*: For a full list of terms and definitions, please refer to the Accounting for Nature<sup>®</sup> Glossary and Key Terms available from the <u>AfN website</u>.

#### **CONSULTATION AND REVIEW**

Accounting for Nature Ltd ('AfN') is committed to the development, review and implementation of a comprehensive Framework that directly impacts Users' credibility, effectiveness, and impact of Accounting for Nature® Certified Environmental Accounts.

To help achieve this, stakeholders are invited to provide feedback on the Accounting for Nature<sup>®</sup> Claims Rules during a review period, which will commence on 5 September 2023 and conclude on 31 January 2024.

This four-month timeframe allows stakeholders to review the Claims Rules and submit their feedback. The feedback obtained during this period will be considered for potential revisions and improvements to ensure the effectiveness and relevance of the Claims Rules.

All stakeholders are requested to submit their feedback via email to <a href="mailto:feedback@accountingfornature.org">feedback@accountingfornature.org</a>.

#### FAILURE TO ADHERE TO THESE RULES

AfN reserves the right to review a Proponent's Public and Confidential Claims, including any communications materials and media concerning those Claims. In accordance with AfN's internal processes, failure to adhere to these Claims Rules may result in decertifying an Environmental Account and/or issuing a Media Release informing the market of this (if a resolution cannot be agreed upon between AfN and the Proponent).

AfN is committed to ensuring the trust and credibility of the Accounting for Nature® Framework, and in so doing, the integrity of environmental markets and policy that use Accounting for Nature® Certified Environmental Accounts to underpin this integrity.

If a Proponent is unsure whether their Claims material comply with these Rules, they are encouraged to contact AfN via <u>certification@accountingfornature.org</u>.

### Contents

Κ	Key terms4			
1	Clai	Claims Rules- Key Points9		
2	Intre	oduction	11	
	2.1	The Accounting for Nature® Framework	11	
	2.2	How & why these Rules have been developed	12	
	2.3	Purpose of the Claims Rules	13	
	2.4	What are 'Claims'?	13	
	2.5	The Environmental Account Registry	14	
3	Key	requirements when making Claims	16	
4	Rule	es when making Claims under the Accounting for Nature® Framework	18	
	4.1	Making Public Claims	18	
	4.2	Making Confidential Claims	18	
	4.3	Minimum requirements for all Claims	19	
	4.3.	Making 'Green Claims'	19	
	4.4	Additional rules for making Claims	20	
	4.4.7	Claims that incorporate Condition, change in Condition, and Condition Targe	ets	
	4.4.2	2 Claims that incorporate Accuracy Levels	21	
	4.4.3	Claims regarding attributing change in Condition to management activities	22	
	4.4.4	4 Claims related to Reporting Periods	22	
	4.4.	5 Claims related to environmental markets	23	
	4.4.6	6 Claiming 'nature positive' using the Accounting for Nature® Framework	24	
5	Арр	roval to use Accounting for Nature® brand assets	26	
	5.1	Approved Users	26	
	5.2	Authorised User	27	
	5.2.1	Claims related to an association with Accounting for Nature Ltd	28	
	5.3	Trustmark & trademark usage	28	
	5.4	Use of Accompanying text	29	
6	Con	npliance with these Rules	. 30	
7	Non	-compliance with these Rules	31	

### List of Tables

Table 1 Key Claim requirements17
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### Key terms

Below are key terms referenced throughout this document. For a full glossary of Accounting for Nature<sup>®</sup> terms, please see the **Accounting for Nature<sup>®</sup>** <u>Glossary</u>.

Term	Document definition
Accredited Auditor	A recognised auditing professional accredited by AfN according to the requirements outlined in the Standard and Audit Rules. Accredited Auditors possess the skills to audit and determine whether an Environmental Account meets, in all material respects, the compliance requirements as evaluated against the Accounting for Nature <sup>®</sup> Certification Criteria. An Accredited Auditor <u>must</u> be engaged by a Proponent seeking their Environmental Account to be Certified– Independent Audit.
Accredited Method	An Accredited Method provides detailed instructions on how to measure the Condition of a specific Environmental Asset, at a particular Accuracy Level, at a particular Scale, and to support a specific Purpose and/or Claim. All Asset Accounts must be prepared in accordance with an Accredited Method nominated at the time of registering an Environmental Account with AfN.
Accounting for Nature® Accredited Auditor and Expert Directory	A list of environmental accounting and auditing professionals who have been accredited according to the requirements outlined in the Accounting for Nature <sup>®</sup> Standard and Accounting for Nature <sup>®</sup> Audit Rules.
Accounting for Nature® Environmental Account Registry	A registry that contains all Environmental Accounts that have been registered and Certified. It is a register on the AfN website that lists key information about the Account, and the source of truth for Environmental Accounts.
Accuracy Level	A description of the accuracy of a Method and the resulting Econd® in terms of how accurately it is expected to describe the Condition (and change in Condition) of an Environmental Asset. The Framework supports three Accuracy Levels – 95% (very high), 90% (high), and 80% (moderate).
AfN Technical Assessment	A standardised procedure using Certification Criteria and Method- specific Criteria undertaken to ensure that an Environmental Account submitted by a Proponent, seeking Certification (AfN Verified), is compliant.
Approved User	An Approved User, is an entity or individual approved by AfN, to use the Accounting for Nature <sup>®</sup> Trustmark, Trademarks, and marketing assets.
Assurance	The result of an independent audit engagement to provide confidence as to the degree of reliance that can be placed on the Environmental Account and it meeting the requirements outlined in the Accounting for Nature® Standard and other Method-specific Criteria

Term	Document definition
Baseline	The first Environmental Account in the Reporting Period. The Baseline is the Reporting Period against which the Proponent will measure future changes in environmental Condition for the purpose of ongoing Certification and/or reporting.
Certification	<ul> <li>The process in which an Environmental Account it is determined to satisfy the Certification requirements of the Framework, including the Standard and applicable Methods. There are two pathways for Certification:</li> <li>Certified - Accounting for Nature Verified: Certified-AfN Verified requires AfN (not an independent auditor) to verify the associated Environmental Account through a standardised Technical Assessment process. Through this process the Environmental Account is checked against the Certification Criteria in the Accounting for Nature® Standard and relevant Method-specific Criteria.</li> <li>Certified-Independent Audit: Certified-Independent Audit requires the engagement of an Accredited Auditor to obtain either a limited or reasonable Assurance Audit for the</li> </ul>
Certification Criteria	associated Environmental Account and the public Claims it is being used to support. Criteria described in the Accounting for Nature® Standard, must be
Certification Criteria	satisfied to receive Accounting for Nature® Certification.
Certification ID:	A unique identifier that corresponds to a specific certification earned for a single Reporting Period and/or Asset Account within a Certified Environmental Account.
Certification Licence Agreement:	A legal agreement that outlines the terms and conditions between the Proponent and AfN regarding a Certified Environmental Account, and use of the applicable Certification Trustmark(s), marketing assets, and associated Trademarks.
Certification Passport	A summary of an Accounting for Nature <sup>®</sup> Certified Environmental Account. It provides an overview of the critical elements of an Environmental Account and is available for use by the Approved User when making Claims about the Environmental Account.
Claim	<ul> <li>Any public or private communication associated with an Environmental Account.</li> <li>Confidential Claims: are confidential and the only type of Claim available for Private Environmental Accounts and are limited to internal business communication or confidential investor communications, which must not be made publicly accessible.</li> <li>Public Claims: are any Claim that is accessible to the public. This includes advertising and marketing information, labels and packaging, and investment or Environmental Social Governance (ESG) reporting.</li> </ul>

Term	Document definition
Condition	The state of an Environmental Asset relative to its Reference Benchmark. Can be used interchangeably with 'State of Nature.'
Condition Target	The intended or desired Econd® or Pcond for a particular Environmental Asset.
Credits	Carbon offset Credits or nature/biodiversity Credits which seek to unitise and monetise the uplift in net greenhouse gas emissions abatement or state of nature, respectively.
End-user	An individual (e.g. consumer), or organisation who relies on the Certified Trustmark to make decisions which may influence financial decisions, investment strategies, land management regimes, the purchase of a product or nature/biodiversity Credit etc.
Environmental Account	A single registered environmental accounting project that reports on the Condition of one or more Environmental Assets. Environmental Accounts are comprised of individual Environmental Asset Accounts. Under the Framework an Environmental Account includes all Environmental Account data, and the Information Statement.
General Claims Criteria	Criteria in the Accounting for Nature® Standard which must be adhered to when making Claims about a Certified Environmental Account and/or when using the "Accounting for Nature®" and "Econd®" registered trademarks. These Criteria should be read in conjunction with this document (the Claims Rules).
Green Claim	Green claims (also referred to as 'environmental claims' or 'eco-friendly claims') are broad (and commonly unsubstantiated) claims that show (for example) how a property, asset, portfolio, product, service, brand, and/or organisation provides a benefit or is less harmful to the environment.
Greenwashing	The deceptive or misleading practice of conveying false or misleading information regarding environmental responsibility or sustainability by a company, organisation, or individual.
Headline Claim	The <u>main</u> intended Claim(s), directly related to the intended Purpose(s) of the Environmental Account and which the Certified Environmental Account will be used to evidence.
Level of assurance	The degree of confidence that can be placed by the intended User in the Environmental Account being Certified.
Information Statement	A single registered environmental accounting project that reports on the Condition of one or more Environmental Assets. Environmental Accounts are comprised of individual Environmental Asset Accounts. Under the Framework an Environmental Account includes all Environmental Account data, and the Information Statement.

Term	Document definition
Material financial or reputational benefit	Any significant benefit or advantage in terms of financial, assets, or reputation that an individual, company, or organisation may obtain through the Certification of an Environmental Account and associated Claims, <u>and</u> the associated trust and due diligence that the intended user (whether directly or indirectly) puts on these Certified Environmental Accounts when buying/relying on these Claims.
Nature Positive	A common goal to halt and reverse the loss of nature, measured from a baseline of 2020 <sup>1</sup> or its current status <sup>2</sup> , by increasing the health, abundance, diversity, and resilience of species, populations, and ecosystems. This is achieved by reducing future negative impacts and restoring and renewing both living and non-living nature, visibly and measurably putting it on the path to recovery, ensuring net gain and compliance with the mitigation hierarchy <sup>3</sup> .
Proponent	Any entity—be it an individual, company, government department/agency or other—who is seeking to have, or has already had, an Environmental Account developed under the Accounting for Nature® Framework.
Reporting Period	The reporting timeframe for which an Asset Account is developed (from less than a year, up to five years; and as an average across multiple years). It describes the period of time in which the data was collected to underpin the calculation of the Econd <sup>®</sup> .
Scale	Describes the spatial resolution at which an Environmental Account has been created. It is used to provide context when interpreting an Environmental Account. AfN assigns the Scale category of an Environmental Account at registration. The Scale categories are defined in the <b>Accounting for Nature® Glossary of Key Terms</b> .
Scope	The parameters (e.g., Environmental Assets, Accuracy Level, Reporting Period, Scale) that the Proponent must consider when designing an Environmental Account. The Scope is informed by the Purpose to ensure that the Environmental Account is fit for the Purpose and any associated Claim.
State of nature	The state or quality of the natural world, encompassing various aspects of the environment, ecosystems, and ecological systems. It describes the state of the Earth's natural systems and the condition in which they exist. This term is interchangeable with 'Condition' under the Framework.
Trademark	The terms "Accounting for Nature" (when referring to the Framework, not the organisation) and "Econd" are Trademarked.

<sup>&</sup>lt;sup>1</sup><u>https://www.naturepositive.org</u>

<sup>&</sup>lt;sup>2</sup> Towards an IUCN nature-positive approach: a working paper (2022).

<sup>&</sup>lt;sup>3</sup> Maron et al, 2023. Nature positive must incorporate, not undermine, the mitigation hierarchy. Don't dilute the Term Nature Positive. Nature Ecology and Evolution.

Term	Document definition
Trustmark	The Accounting for Nature® Trustmarks are designed to recognise and promote the work Proponents with Certified Environmental Accounts have done to measure the Condition of the Environmental Assets. There are two types of Trustmarks:
	• Certified–Independent Audit Trustmark: a simple, credible Trustmark that is awarded to Proponents who have created and had their Environmental Accounts Independently Audited in accordance with the Framework.
	• Certified–AfN Verified Trustmark for Proponents who choose not to have their Account Independently Audited but instead submit their Environmental Account to AfN for an AfN Technical Assessment.
Uplift	An improvement or gain in environmental Condition/state of nature.

### 1 Claims Rules- Key Points

As part of the AfN Certification License Agreement, these Claims Rules require Proponents, partners, and End-users (e.g. investors, consumers etc) to understand and communicate Claims associated with an Accounting for Nature<sup>®</sup> Certified Environmental Account accurately and appropriately.

These Rules should be used in conjunction with the **Accounting for Nature® Trustmark Guidelines**<sup>4</sup> which outlines the conditions of use and visual specifications for the Accounting for Nature® Trustmark, Trademarks, and associated marketing assets.

## In summary, the following elements must be adhered to when making Claims about an Accounting for Nature<sup>®</sup> Certified Environmental Account and/or when using Accounting for Nature<sup>®</sup> registered Trademarks:

- 1. Adhere to the Five Key Requirements (Section 3) of these Rules so that Claims relating to Environmental Accounts are: accurate, specific, coherent, relevant, and transparent.
- 2. Proponents may not make any **Public Claims** associated with or using Accounting for Nature<sup>®</sup>, the Econd<sup>®</sup>, the Certification Trustmarks and/or Associated Marketing Assets unless the Environmental Account is **publicly listed** in the Accounting for Nature<sup>®</sup> Environmental Account Registry ('Environmental Account Registry').

Where an Environmental Account is listed in the Environmental Account Registry, a Proponent may make Public Claims associated with the Econd® only after an Environmental Account has been **Certified–Independent Audit** or **Certified–AfN Verified.** 

- 3. Any Public Claims being made with respect to an Accounting for Nature<sup>®</sup> Certified Environmental Account and the Econd<sup>®</sup> must be done so with due regard for the Environment Account's Purpose, Scope and Scale, included Environmental Asset(s), assigned Accuracy level(s), and Certification pathway.
- 4. Where an Environmental Account is Registered and Certified but **not publicly available** in the Environmental Account Registry, Proponents may make appropriate **Confidential Claims** (subject to the same rules for Public Claims) between counterparties for internal decision-making and due diligence only. In doing so, they must make reasonable efforts to ensure these Claims do not enter the public domain. If they fail to do so, reasonable efforts must be made to revoke this Claim from the public domain. AfN reserves the right to decertify/suspend the Account and/or issue a public statement if the proponent fails to comply in accordance with AfN's process for managing non-compliant Claims.
- 5. Proponents must not make false and/or misleading Claims, particularly with respect to attributing management actions as having a positive or negative effect on the Condition of Environmental Assets. Any statements attributing the change in Condition to management activities must be supported by a Certified Environmental Account that specifically includes an appropriate approach to attribution.

<sup>&</sup>lt;sup>4</sup> Available to Proponents once their Environmental Account has been Certified.

6. Unless approved in writing by AfN, Proponents must not Claim or imply - including through any misleading or poorly written communications - that AfN has Certified, endorsed, warranted, or otherwise supported a public or privately made qualified claim that an Environmental Asset is (for example) 'healthy', 'good condition' or similar, or that an individual, organisation or other entity is 'sustainable", 'nature positive', 'regenerative' or similar.

While Accounting for Nature<sup>®</sup> Certified Environmental Accounts and the Econd<sup>®</sup> can be used to evidence such Claims, Proponents need to be clear that any such Claims are their own opinion or that of another third-party program or standard (other than AfN).

**Note:** Where an Accounting for Nature<sup>®</sup> Certified Environmental Account is used to evidence a Claim or credit under a third-party program or standard, or under the Proponent's own opinion, it must be clearly stated.

For example: "[PROPONENT] has issued credits under the [THIRD-PARTY PROGRAM/ STANDARD] which are based on an Accounting for Nature® Certified Environmental Account which evidences an uplift in condition of [ENVIRONMENTAL ASSET] to a 95% accuracy level.

- 7. Where an Accounting for Nature® Certified Environmental Account and Econd® is being stapled to a carbon credit to support a nature-based solution or environmental co-benefit Claim, or being used to issue a stand-alone nature/biodiversity credit (e.g., standalone nature or biodiversity credit), Proponents must adhere to the Nature & Biodiversity Credit Issuance Rules and/or Carbon Offset Stapling Rules (as relevant), comply with all aspects of the Audit Rules, and sign a Unitisation License Agreement.
- 8. Proponents must ensure compliance with all applicable government legislation and/or best-practice guidelines and indemnify AfN from any actions arising from a Proponent's non-compliance with legislature, regulators/agencies or associated standards e.g., Australian Competition & Consumer Commission (ACCC), United States Securities & Exchange Commission (SEC) and European Commission.
- 9. Claims using the Accounting for Nature® Trustmarks, trademarks, and associated marketing assets must comply with the terms of the Accounting for Nature® Certification License Agreement and the requirements of the Accounting for Nature® Standard; and/or the Memorandum of Understanding (or any other legal agreement with AfN). The Accounting for Nature® Company Logo, Accredited Expert Logo and Accredited Method Logo may only be used as per outlined in these Rules and in the Trustmark Guidelines<sup>5</sup>.

**Important:** The integrity of the Accounting for Nature<sup>®</sup> brand is critical to the integrity of the environmental markets that we support. If you are unsure whether a Claim is credible, or whether you have a Certified Environmental Account to adequately support that Claim, we encourage you to contact AfN to discuss.

<sup>&</sup>lt;sup>5</sup> Available to Proponents once their Environmental Account has been Certified.

### 2 Introduction

### 2.1 The Accounting for Nature® Framework

AfN is a not-for-profit organisation that works with farmers, Indigenous land managers, private land conservation organisations, investors, governments, and regional natural resource management organisations to implement the Accounting for Nature<sup>®</sup> Framework ('the Framework'). AfN is committed to building the world's most trusted environmental accounting Standard.

To maintain the trust that our Proponents, partners, and the public have in the Accounting for Nature® brand, it is imperative that there is clarity regarding the way in which Accounting for Nature® Certified Environmental Accounts are created, measured, and Certified under the Framework. This has been achieved through the <u>Accounting for</u> <u>Nature® Standard</u> ('the Standard'), which provides the criteria around key components of the Framework for developing and Certifying Environmental Accounts.

Accounting for Nature<sup>®</sup> Certified Environmental Accounts use the Econd<sup>®</sup> (an Environmental Condition Index) as a common base from which to describe Condition and measure change. The Econd<sup>®</sup> is a score between 0 and 100 that describes the Asset's Condition relative to its undegraded state (its Reference Condition Benchmark). This Reference Benchmark provides context for interpreting the magnitude and direction of change and can be applied across different Environmental Assets.

Accounting for Nature<sup>®</sup> Certified Environmental Accounts are listed on the Environmental Account Registry including links to the Information Statement, Certification Passport, and a registry of the Annual Certification Compliance Reports. The Environmental Account Registry (including all accompanying documents) is the primary source for all Claims made on a Certified Environmental Account.

Accuracy and transparency are of upmost importance when making any Claims (public or confidential) about an Accounting for Nature<sup>®</sup> Environmental Account (including the Econd<sup>®</sup>), particularly when the Environmental Account data is used to evidence Claims, such as 'carbon environmental co-benefits', 'sustainable', and/or 'nature positive'.

**Note.** Separate to these Rules, Proponents must adhere to the **Trustmark Guidelines**<sup>6</sup> for how the Accounting for Nature<sup>®</sup> Trustmarks, trademark and associated marketing assets are to be presented.

<sup>&</sup>lt;sup>6</sup> Available to Proponents once their Environmental Account has been Certified.

### 2.2 How & why these Rules have been developed

Transparency and scientific integrity are the foundation for building trust in environmental markets and policy. In developing these Claims Rules, AfN has taken guidance from existing national and international best-practice guidelines, such as those developed through the United Nations (UN) Environment Program<sup>7</sup>. Emerging initiatives, such as the Taskforce on Nature-related Financial Disclosure (TNFD) will continue to shape these Rules as these initiatives evolve.

Importantly, AfN has also considered anti-greenwashing laws and guidance from governmental organisations around the world. These include:

- the Australian Commonwealth Government's Australian Consumer Law ('ACL')<sup>8</sup> and ACCC provide recommendations and oversight regarding green marketing;
- the ACCC Environmental and sustainability Claims guidance for business<sup>9</sup> explains obligations under the ACL which businesses must comply with when making environmental or sustainability Claims;
- a proposed European Commission's Unfair Commercial Practices Directive and the Consumer Rights Directive which will prohibit companies from making generic or vague Claims about environmental performance that cannot be backed up by evidence and prohibit sustainability labels that are not based on third-party verification or established by public authorities; and
- the SEC in the United States is investigating new anti-greenwashing rules which will provide investors with consistent and comparable information about Environmental Social Governance (ESG) factors that investors can then use when choosing their investment strategy.

AfN notes recent and significant interest by authorities in regulating Green Claims<sup>10</sup>, including those tagged with 'nature positive', 'sustainable', and 'environmental cobenefits'. As such, AfN is committed to regularly reviewing these Claims Rules with the intention to:

- maintain the integrity and trust in the Accounting for Nature® brand;
- ensure that the changing needs of Accounting for Nature<sup>®</sup> stakeholders are met; and,
- meet its obligations in respect of any legislative requirements.

These Rules apply to parties that are either reporting on an Environmental Account (such as Proponents or Portfolio Administrators) or the audience for/users of these Claims e.g. partners, investors, buyers of environmental products, grant recipients etc.

<sup>&</sup>lt;sup>7</sup> United Nations Environment Programme 2017 Guidelines for Providing Product Sustainability Information

<sup>&</sup>lt;sup>8</sup> ACCC 2011 Green Marketing and the Australian Consumer Law

<sup>&</sup>lt;sup>9</sup> Making Environmental Claims. A guide for businesses. ACCC, December 2023

<sup>&</sup>lt;sup>10</sup> Green claims (also referred to as 'environmental claims' or 'eco-friendly claims') are broad (and commonly unsubstantiated) claims that show (for example) how a property, asset, portfolio, product, service, brand, and/or organisation provides a benefit or is less harmful to the environment.

These Rules are designed to maintain the integrity of the Standard and promote confidence in the markets and mechanisms in which we operate.

This document is consistent with and should be read in accordance with the Standard and Accounting for Nature<sup>®</sup> Audit Rules.

By providing a practical standard of scientific credibility to measure environmental Condition, government, businesses, and consumers can be assured by the quality of information they have access to and therefore have the confidence that actual environmental benefits are being realised.

**Note.** AfN will notify Approved Users (see section 5.1 Approved Users) of any changes to these Rules in writing and, where necessary, Approved Users may be asked to sign an amended Certification License Agreement and/or Unitisation License Agreement. (if Certified Environmental Accounts are to be stapled to carbon offset credits or used to issue nature/biodiversity credits.

### 2.3 Purpose of the Claims Rules

The purpose of the Claims Rules is to prescribe:

- five **Key Requirements** that must be upheld when making Public and Confidential Claims associated with an Accounting for Nature<sup>®</sup> Environmental Account;
- the conditions and limitations of use for when Public Claims can me made;
- the conditions and limitations of use for when Confidential Claims can be made;
- examples of Claims that can be made; and,
- **the conditions of use** of the Accounting for Nature<sup>®</sup> Certified–Independent Audit and Certified–AfN Verified Trustmarks, "Accounting for Nature" and "Econd" Trademarks, and associated marketing assets, and the Accounting for Nature Company Logo.

### 2.4 What are 'Claims'?

Within the context of the Accounting for Nature<sup>®</sup> Framework, 'Claims' refer to **any public or confidential (private) written/published or oral communication associated with an** Accounting for Nature<sup>®</sup> Certified Environmental Account.

This includes outcomes-based Claims and statements that seek to disclose the current state and trend in environmental Condition (using the Econd<sup>®</sup> and associated underlying metrics) of an environmental accounting area, such as a project, property or region, or real asset including a portfolio of properties/real assets.

Claims can be made publicly or confidentially:

• **Public Claims** are any communication that is accessible beyond internal or confidential 'business to business' communications. They generally consist of public relations or mass communication intended to reach a targeted and/or broad audience through channels such as websites, social media, and media releases. Public Claims can include but are not limited to advertising and marketing information, labels and packaging, interviews, publicly available documents and investment or Environmental Social Governance ('ESG') reporting.

• **Confidential Claims** generally consist of written and spoken/oral communications made under circumstances creating a reasonable expectation of privacy and where the public is restricted from the communication. This may include (but is not limited to) phone calls, private emails, and confidential reports between parties.

### 2.5 The Environmental Account Registry

Every Claim made regarding Accounting for Nature<sup>®</sup> or the Econd<sup>®</sup> must be supported/evidenced by an Accounting for Nature<sup>®</sup> Certified Environmental Account and associated Environmental Account Registry.

The Accounting for Nature<sup>®</sup> online Environmental Account Registry is a central and transparent repository of key information for each Accounting for Nature<sup>®</sup> Certified Environmental Account, and is used as a source of provenance and truth to support Claims for both Public or Private<sup>11</sup> Environmental Accounts.

The Environmental Account Registry is administered by AfN using information from the Environmental Account Information Statement and any other required information supplied by the Proponent. An Environmental Account Registry page includes the following information:

- General details about the Environmental Account, including Account registration date, Certification date, the Purpose of the Account, Account location and size (including % of the property covered).
- The Scale of the Environmental Account: "project" (including the % of the property the Environmental Account covers), "property", "regional" or "aggregated" (and if it forms part of a "Portfolio").
- The Certification assurance achieved (Certified–Independent Audit and Certified–AfN Verified).
- Asset Account summary which includes for each Environmental Asset: the Accredited Method used, Accuracy Level, Econd<sup>®</sup> score, and Condition Targets (if applicable).
- Links to download the Information Statement and a registry of the Annual Certification Compliance Reports.
- Significant outcomes of the Account.
- Mandatory disclosures & limitations of the Account.
- General information about the Environmental Account and Proponent.
- Where applicable, additional information on:
  - o linked carbon offset units and other environmental products,
  - Productive Condition Index ('Pcond') data,
  - o Cultural Condition Assessment information,
  - Any other relevant collateral (video, documents, images) that includes reference to the Environmental Account, e.g. ESG reports.

<sup>&</sup>lt;sup>11</sup> Accounting for Nature<sup>®</sup> Environmental Account Registry pages associated with Accounting for Nature<sup>®</sup> Certified Environmental Accounts that are being used for Confidential Claims are secured through password protection and/or other authentication tools.

**Important:** An Environment Account may be listed as either "Public" or "Private" in the Environmental Account Registry. Accordingly, this will determine whether the Proponent is eligible to make Public Claims or whether they will be limited to only make Confidential Claims.

### 3 Key requirements when making Claims

The UN, through the Sustainable Development Goals (SDGs), identifies the need to improve communication and access to information regarding sustainable consumption and production.

The TNFD with the UN Environment Programme as a founding partner, is developing a risk management and disclosure framework to report and act on evolving nature-related risks, with the ultimate aim of supporting a shift in global financial flows away from nature-negative outcomes and toward nature-positive outcomes.

### Taskforce for Nature-related Financial Disclosure (TNFD) on

#### Accounting for Nature®

"Environmental accounting standards, such as, but not limited to, those provided by Accounting for Nature<sup>®</sup>, generally require the measurement of the actual condition of an environmental asset through the use of earth observation, sensors, field observations, eDNA and other data gathering options and technologies."<sup>12</sup>

In many jurisdictions it is illegal for a business to make an environmental Claim that is misleading or deceptive; Claims should relate to real environmental benefits but should not overstate them.

It is not AfN's role to certify or make judgement calls on the quality of green claims directly (terms such as "environmentally friendly", "nature positive" etc). Instead, AfN focuses on assessing and certifying the underlying scientific credibility (including the Accuracy Level) of actual data/outcomes for environmental Condition.

Accounting for Nature<sup>®</sup> Certified Environmental Accounts can evidence a variety of Enduses and schemes, including, but not limited to, verification of nature-based solutions and environmental co-benefits associated with carbon credits, the issuance of nature/biodiversity credits, green labelling, and performance-based grant schemes and financial instruments.

These Claims Rules provide the requirements when communicating accurate and appropriate Public and Confidential Claims in association with an Accounting for Nature<sup>®</sup> **Certified–Independent Audit** or **Certified–AfN Verified** Environmental Account.

AfN has adopted five Key Requirements explained in Table 1 below. These requirements inform the **General Claims Criteria** in the Standard (Section 10.1). Approved Users must adhere to these requirements when communicating any Claims associated with an Accounting for Nature<sup>®</sup> Certified Environmental Account

<sup>&</sup>lt;sup>12</sup> The TNDF Nature-Related Risk and Opportunity Management and Disclosure Framework. <u>Beta v0.2</u> <u>Annex 1</u> June 2022.

#### Table 1 Key Claim requirements

Requirement of Claims	
Accurate	Claims must be accurate, detailed, and scientifically supported (i.e., any figures must be the same as evidenced in the Accounting for Nature <sup>®</sup> Certified Environmental Account) to ensure the measure and trend in environmental Condition, Accuracy Level, and Certification pathway (etc.) are not misrepresented.
Specific	Claims must be specific with regard to the Scope (e.g., environmental assets included, scale etc) and Purpose/end-use (e.g., claim or credit, or internal decision making) and not be left open to broader interpretation.
Coherent	Claims must be articulated in line with the level of understanding of the intended audience and in a manner that outcomes, attributions, and benefits are not misrepresented.
Relevant	Claims must pertain to and be supported by an Accounting for Nature® Certified Environmental Account that is underpinned by an Accounting for Nature® Accredited Method that is fit-for-purpose and that allows for meaningful comparison of the environmental Condition over time.
Transparent	Claims must include the Certification ID and reference the relevant Environmental Account Registry listing e.g., via URL or the supplied QR Code for printed material.

# 4 Rules when making Claims under the Accounting for Nature® Framework

Claims regarding both **Certified-Independent Audit** and **Certified-AfN Verified** Accounting for Nature<sup>®</sup> Certified Environmental Accounts, are governed by these Rules. This section describes the rules for:

- making Public Claims;
- making Confidential Claims;
- minimum requirements for all Claims; and
- additional rules for making Claims that carry a material financial and/or reputation risk.

These Rules extend to all End-users who intend to make third party Claims relating to an Accounting for Nature<sup>®</sup> Certified Environmental Account.

### 4.1 Making Public Claims

Proponents who have had an Environmental Account(s) Certified by AfN are only permitted to make Claims once their Accounting for Nature<sup>®</sup> Certified Environmental Account is made public on the Environmental Account Registry.

Details on the Accounting for Nature<sup>®</sup> Environmental Account Certification process is provided in the **Accounting for Nature<sup>®</sup>** <u>Standard</u>, **Accounting for Nature<sup>®</sup>** <u>Environmental</u> <u>Account Rules</u>, and **Accounting for Nature<sup>®</sup>** <u>Audit Rules</u>

All Public Claims must be made in accordance with the requirements set out in this document and the **Accounting for Nature**<sup>®</sup> **Certification Licence Agreement**, **Accounting for Nature**<sup>®</sup> **Standard** and relevant supporting documents.

Common examples of where Public Claims can be made include the Proponent's website or social media, in promotional material and marketing collateral, and/or in ESG and investment reports.

### 4.2 Making Confidential Claims

Organisations that do not wish to disclose the results of an Accounting for Nature<sup>®</sup> Certified Environmental Accounts publicly, but want to make Confidential Claims, may still register, and have an Environmental Account Certified by Accounting for Nature<sup>®</sup>.

An unlisted (confidential) and password-secured Environmental Account Registry page will be provided for Confidential Environmental Accounts, with access only granted to parties who have been authorised by the Proponent to do so.

In choosing a Confidential Environmental Account, Proponents will **not** be authorised to use the Accounting for Nature<sup>®</sup> Trustmark except for internal, peer-to-peer, business-tobusiness confidential purposes, (e.g., reporting, investment proposals), or make any Public Claims regarding their Environmental Account until such time that the account is made public in the Environmental Account Registry.

### 4.3 Minimum requirements for all Claims

### <u>Written/published</u> Public Claims must always include, at a minimum, the following elements to meet the five Key Requirements of these Rules:

- the ID of the Environmental Account either in the text of the Claim or via the supplied QR code, Certification Passport or a footnote;
- the Certification type in the text (Certified–Independent Audit or Certified–AfN Verified) or the relevant Trustmark; and
- a link to the Environmental Account Registry webpage either in the text of the Claim or via the supplied QR code or a footnote.

### A version of the Certification Trustmark(s) has been designed to incorporate all three of the above minimum requirements. See the Accounting for Nature<sup>®</sup> Trustmark Guidelines.

In addition to the minimum requirements, Proponents may also choose to attach/include their Certification Passport with a Claim. Public Claims can also incorporate additional text that reflects the Proponents commitment to, for example:

- "comply with one of the most scientifically credible and trusted natural capital accounting standards";
- "develop Environmental Accounts using rigorous scientific Methods that have been accredited by Accounting for Nature®"; and/or
- "have an Environmental Account independently audited and Certified– Independent Audit" or "have an Environmental Account Certified–AfN Verified on successful completion of an Accounting for Nature<sup>®</sup> Technical Assessment."

### Example minimum claim

- "[PROPONENT] has measured the condition at [PROPERTY NAME] ([ENVIRONMENTAL ACCOUNT ID]) according to the science-based Accounting for Nature® Standard and was [CERTIFICATION PATHWAY] by AfN. For more information [click here (for websites) OR QR code (for printed material)]"

<u>Any spoken/oral</u> Public Claims (e.g. videos, interviews, podcast and speeches) should not over extend the Claim as per the minimum requirements above.

### 4.3.1 Making 'Green Claims'

Proponents must never claim or imply - including through any misleading communications - that AfN has Certified, endorsed, warranted, or otherwise supported a public or confidential Claim that an Environmental Asset is (for example) 'healthy', 'good condition' or similar, or that an organisation or other associated entity (or its products or services) is 'sustainable', 'nature positive', 'regenerative' or similar.

While the Accounting for Nature<sup>®</sup> Certified Environmental Accounts and the Econd<sup>®</sup> can be used to evidence such Claims, Proponents need to be clear and justify that these are made wholly on their own accord (or through the use of a third-party determination/certification scheme or program). Likewise, where Claims include broad, generalised, or qualifying statements about the outcomes of an Accounting for Nature<sup>®</sup> Environmental Account, they must clearly state who is making that general/qualifying statement e.g., "Proponent X believes that", or "According to Proponent Y".

**Note:** Where a Proponent is intending to make a "Green Claim" that includes terms such as 'nature-positive', 'regenerative' or 'sustainable' (etc) that is NOT supported/defined/prescribed by a third-party program or standard, AfN strongly recommends a limited assurance conclusion via independent audit be obtained for that Green Claim and the associated Certified Environmental Account to provide themselves and users of that Green Claim with a high degree of confidence that the risk of greenwashing has been minimised.

### 4.4 Additional rules for making Claims

Regardless of whether a Claim is being made publicly or confidentially, there are several types of Claims that are permitted for Certified–Independent Audit and Certified–AfN Verified Environmental Accounts.

### 4.4.1 Claims that incorporate Condition, change in Condition, and Condition Targets

Proponents may include the Econd<sup>®</sup> in Public Claims, where Certified by AfN as part of an Environmental Account. Refer to **Accounting for Nature<sup>®</sup> Environmental Account Rules** for more information.

Proponents with Certified Environmental Accounts can make Claims that refer to:

- the Certified environmental Condition of Environmental Assets based on the Econd<sup>®</sup> and Indicator Condition Scores (ICS);
- the Certified productive Condition of Assets based on the Pcond (must always be claimed alongside an Econd<sup>®</sup>);
- the historic condition of Environmental Accounts based on any past Econd<sup>®</sup> scores that have been Certified;
- changes in condition over time, by specifically referencing the change in the Econd® (from Reporting Period to Reporting Period, for example), or specific changes to Indicators within the overall Econd®, and;
- Condition Targets that describe the desired or planned Condition of the Environmental Account.

Any outcome-based Claims must be supported by clear language and graphics (if any) that explicitly limits the Claim to a specific outcome that is underpinned by the relevant Accounting for Nature<sup>®</sup> Accredited Method. Claims that include past Condition or Condition Targets are more complex, and care is needed to ensure they are not misleading or confusing.

These types of written/published Public Claims must include additional text, links or Trustmark to meet the minimum requirements (see section 4.3).

### Example Claims related to a specific Environmental Asset contained within an Environmental Account

- "The Econd® for the [ENVIRONMENTAL ASSET] at [PROPERTY] has increased by X% from [YEAR] to [YEAR] (from Econd® A to Econd® B) indicating an improvement in environmental condition."

"[PROPONENT] has maintained the condition of [ENVIRONMENTAL ASSET] from [YEAR] to [YEAR]."

"The condition of [ENVIRONMENTAL ASSET] from [YEAR] to [YEAR] has improved" (from Econd® A to Econd® B)."

"On the land managed by [PROPONENT], the condition of X endangered [ENVIRONMENTAL ASSET] on its property from [YEAR] to [YEAR] improved" (from Econd® A to Econd® B) (habitat/ species)."

"The productive condition of [ENVIRONMENTAL ASSET] from [YEAR] to [YEAR] has improved" (from Pcond A to Pcond B)."

### 4.4.2 Claims that incorporate Accuracy Levels

Accounting for Nature<sup>®</sup> Certified Environmental Accounts have a specific Accuracy Level associated with each Environmental Asset (based on the Accredited Method), that reflects the robustness of processes used for the measurement of the Condition of the Environmental Asset. Proponents with Certified Environmental Accounts may make Claims that reflect the specific Accuracy Level they have achieved for each Environmental Asset.

An Accuracy Level must be appropriate for the Purpose and intended Claims of the Environmental Account. If the Purpose is to intend to Claim an uplift in Condition of an Environmental Asset to underpin environmental markets, then the Account would require a high or very high Accuracy Level.

However, if the Purpose of the Environmental Account is simply to provide a broad understanding of the environmental Condition of an Asset (for example, whether it is healthy or degraded) to inform management decisions, then the Accuracy Level need only be as high as is necessary to inform that process<sup>13</sup>.

Due to the necessary scientific complexity associated with Accuracy Levels, Proponents must ensure any communication is clear, not misleading, and targeted appropriately at the intended audience. Any Claims must include weblinks or footnotes that provide adequate context, including the exact definition of each Accuracy Level.

For written/published Public Claims, these types of statements must include additional text, links, or Trustmark to meet the minimum requirement (see section 4.4).

<sup>&</sup>lt;sup>13</sup> See the **Accounting for Nature Environmental Account Rules** for further information on Environmental Account Purpose and Scope and relevance to Econd Accuracy levels.

### **Example Claims incorporating Accuracy Levels**

- "[PROPONENT] has developed the Environmental Account containing [ENVIRONMENTAL ASSET] using the highest Accuracy Level available under the Accounting for Nature<sup>®</sup> Standard which means it has the greatest ability to detect change in the condition of the measured environmental asset."

"[PROPONENT] has measured the condition of [ENVIRONMENTAL ASSET] at [PROPERTY/PROJECT] using a method accredited with a 95% accuracy where key environmental indicators are likely to be highly accurate (≥95%) when measuring the condition of environmental assets and detecting change in their condition through time."

"[PROPONENT] has achieved a 90% accuracy for the measurement of the health of [ENVIRONMENTAL ASSET]. The Econd® for this asset, measured with an accuracy of [90%] or greater, has increased by X% from [YEAR] to [YEAR]."

"[PROPONENT] has achieved a 80% Accuracy in the measurement of the health of [ENVIRONMENTAL ASSET] and found that from [YEAR] to [YEAR] there is a [moderate] level of evidence to indicate that the asset has improved in condition."

### 4.4.3 Claims regarding attributing change in Condition to management activities

Where an Accounting for Nature<sup>®</sup> Certified Environmental Account is being used to support Claims that attribute change in Condition to specific management activities, the Environmental Account must be Certified as having included a robust attribution approach (as per the Standard).

Certified Environmental Accounts that do not include a robust attribution approach are not permitted to makes Claims that management activities are directly responsible for any changes (e.g., improvements (or avoided declines)) in the environmental Condition within the accounting area.

#### 4.4.4 Claims related to Reporting Periods

To be Certified, all Environmental Account must be Certified as having met the Reporting Period requirements as stipulated in the Standard and specific Method(s) applied.

Where Claims include an Econd® calculated over a Reporting Period greater than one year, the Claim must specify the years that the calculation applies (e.g., 2022-2024 for a three-year reporting period).

### Example Claims incorporating reporting periods greater than one year

- "[PROPONENT] has achieved a 90% accuracy for the measurement of the health of [ENVIRONMENTAL ASSET]. The Econd® for this asset, measured with an accuracy of [90%] or greater, has increased by X% across a rolling reporting period from [YEAR-YEAR] to [YEAR - YEAR]."

"[PROPONENT] has achieved an 80% Accuracy in the measurement of the condition of [ENVIRONMENTAL ASSET] and found that from [YEAR- YEAR] to [YEAR - YEAR] there is a [moderate] level of evidence to indicate that the asset has improved in condition across the calculated rolling average."

### 4.4.5 Claims related to environmental markets

The use of Accounting for Nature<sup>®</sup> Certified Environmental Accounts to support Claims linked to environmental markets – whether for environmental co-benefit Claims associated with carbon offset credits, or to support the issuance of standalone nature/biodiversity credits (etc) – must be considered carefully to uphold the integrity of such Claims.

AfN has developed separate Rules for **Carbon Offset Stapling and Labelling**<sup>14</sup> and **Nature Credit Issuance**<sup>15</sup> which seek to standardise this process and maintain market integrity and consistent labelling and include additional requirements that must be adhered to.

Where an Accounting for Nature<sup>®</sup> Certified Environmental Account is being used to support a Claim related to an uplift in environmental condition (including 'environmental co-benefits' associated with carbon offset units, standalone credits focused on biodiversity/nature improvement and that are independent of carbon, or other environmental products), Claims must comply with the rules and requirements of these Claims Rules, the **Carbon Offset Stapling and Labelling Rules** and the **Nature Credit Issuance Rules**, as well as those prescribed by the <u>Audit Rules</u>.

In addition to signing an Environmental Account Certification Licence Agreement, Environmental Accounts that are linked to carbon and other environmental markets (through registry labelling and to underpin issuance of associated units) must sign a Unitisation Licence Agreement, which specifies the requirements and obligations Proponents agree to when making environmental Conditions Claims in environmental markets.

**Note:** An Independent Audit must be used for all Environmental Accounts where there is likely to be a material financial or reputational benefit derived from environmental uplift/avoided degradation <u>and</u> where the End-user relies on the associated Accounting for Nature<sup>®</sup> Certified Environmental Account to prove the resulting Claim. See the **Accounting for Nature<sup>®</sup> Audit Rules** for further information.

<sup>&</sup>lt;sup>14</sup> In development

<sup>&</sup>lt;sup>15</sup> In development

### Example Claims that support environmental markets:

- "[PROPONENT] has developed an Accounting for Nature<sup>®</sup> Certified Environmental Account [ENVIRONMENTAL ASSET] that evidences improved condition in habitat and an increase in [ASSET/S] population associated with [CARBON OFFSET PROJECT]."

"Under the Accounting for Nature® Framework [PROPONENT] has measured the condition of [ENVIRONMENTAL ASSET/S] at [PROJECT] and issued nature credits based on the third-party verified increase in the Econd®" for that [ENVIRONMENTAL ASSET/S]".

### 4.4.6 Claiming 'nature positive' using the Accounting for Nature<sup>®</sup> Framework

The IUCN<sup>16</sup> defines nature positive as a common goal to halt and reverse the loss of nature measured from its current state, reducing future negative impacts alongside restoring and renewing nature, to put both living and non-living nature measurably on the path to recovery.

While it is generally beyond the scope of the Accounting for Nature<sup>®</sup> Framework, AfN, at a minimum, considers any net improvement in the Econd<sup>®</sup> (beyond relevant Accuracy Level thresholds) and compared to its baseline, to be considered a positive outcome for nature.

Importantly, AfN does not certify whether an individual, organisation, product or service is 'nature positive' (or similar), and therefore any Proponent using a Certified Environmental Account to evidence this must not imply that AfN does.

Certified Environmental Accounts may be used to demonstrate a company's or entity's progress towards an asset specific target and related contribution to global societal goals and/or as part of their actions to take responsibility and reduce their impacts on nature, and/or commitments to a nature positive strategy.

Accounting for Nature<sup>®</sup> Certified Environmental Accounts on their own cannot be used to make a 'nature positive' Claim at a company level as they are limited to the nature outcome that is being measured.

Any Claim beyond the specific nature outcome and/or attributing 'nature positive' statement to the overall entity does not align with current guidance provided in emerging documents, such as the ACCC Environmental and sustainability Claims<sup>17</sup>, Voluntary Carbon Markets Initiative Claims Code<sup>18</sup> and the World Economic Forum Pilot Claims Guide to support the Legitimate Use of Biodiversity Credits.<sup>19</sup>

For further information, consult the:

- Accounting for Nature<sup>®</sup> Nature Positive Guidelines<sup>20</sup>; and
- Accounting for Nature<sup>®</sup> Nature Credit Issuance Rules<sup>21</sup>.

<sup>&</sup>lt;sup>16</sup> Towards an IUCN nature-positive approach: a working paper (2022).

<sup>&</sup>lt;sup>17</sup> Environmental and sustainability claims. Draft guidance for business. ACCC, July 2023

<sup>&</sup>lt;sup>18</sup> Claims Code of Practice, Building integrity in voluntary carbon markets, VCMI, June 2023

<sup>&</sup>lt;sup>19</sup> Pilot Claims Guide to support the Legitimate Use of Biodiversity Credits: A Working Draft. July 2023

<sup>&</sup>lt;sup>20</sup> In development

<sup>&</sup>lt;sup>21</sup> In development

### Example claims when the Accounting for Nature<sup>®</sup> Framework is used to support 'nature positive' statements

- "[PROPONENT] has demonstrated commitment toward 'nature positive' organisation goals based on the definition / criteria provided by [RESOURCE/STANDARD'] through the Certification of an Accounting for Nature<sup>®</sup> Environmental Account which measured the [YEAR] baseline condition of [ENVIRONMENTAL ASSET] to a 90% Accuracy Level.

"[PROPONENT] demonstrated progress toward 'nature positive' targets based on the definition / criteria provided by [RESOURCE/STANDARD'] through the Certification of Accounting for Nature<sup>®</sup> Environmental Account [ACCOUNT ID] which measured improved condition in habitat and an increase in [ASSET/S] population.

"[PROPONENT] demonstrated progress toward 'nature positive' targets based on the definition / criteria provided by [RESOURCE/STANDARD'] through the Certification of Accounting for Nature® Environmental Account [ENVIRONMENTAL ASSET]. The Econd® for this asset, measured with an accuracy of [90%], has increased by X% from [YEAR] to [YEAR] and X% from the [YEAR] baseline evidencing uplift in condition of [ENVIRONMENTAL ASSET].

"[PROPONENT] has evidenced progress toward 'nature positive' targets based on the definition / criteria provided by [RESOURCE/STANDARD'] through the Certification of an Accounting for Nature<sup>®</sup> Environmental Account.

# 5 Approval to use Accounting for Nature® brand assets

### 5.1 Approved Users

An Approved User is an individual or organisation (legal entity) that has gained permission, through signing an Accounting for Nature<sup>®</sup> Certification License Agreement (or other Agreement), to use certain Accounting for Nature<sup>®</sup> marketing assets. There are four categories of Approved Users:

- 1. **Certified–Independent Audit Approved User:** Those who have had their Environmental Account Independently Audited and then Certified by Accounting for Nature<sup>®</sup> and are eligible to use the Certified–Independent Audit Trustmark;
- 2. **Certified–AfN Verified Approved User:** Those who have had their Environmental Account assessed through an AfN Technical Assessment and Certified–AfN Verified and are eligible to use the Certified Trustmark;
- 3. Accounting for Nature<sup>®</sup> Accredited Expert and Accounting for Nature<sup>®</sup> Accredited Auditor Approved User: Those who have applied for and met the criteria to be accredited as an Accounting for Nature<sup>®</sup> Accredited Expert or an Accounting for Nature<sup>®</sup> Accredited Auditor are eligible to use the Accounting for Nature<sup>®</sup> Accredited Expert or Accredited Auditor logo.
- 4. Accounting for Nature<sup>®</sup> Accredited Method Author Approved User: Those who have a Method accredited under the Accounting for Nature<sup>®</sup> Framework are eligible to use the Accounting for Nature<sup>®</sup> Accredited Method Logo.

**Certified–Independent Audit and Certified–AfN Verified Approved Users** must sign the relevant Accounting for Nature® Certification License Agreement, pay all fees, and have received formal approval by AfN to use the relevant Trustmark and associated marketing assets. To maintain access and the right to use the Accounting for Nature® Trustmark and associated trademarks and marketing assets. Approved Users must maintain their Environmental Accounts in accordance with the Standard and abide by the Accounting for Nature® requirements as specified in the Audit Rules and these Claims Rules. The Trustmarks and associated marketing assets must be used in compliance with the Trustmark Guidelines.

All Accounting for Nature® Accredited Expert and Auditor Approved Users are eligible to use the Accounting for Nature® Accredited Expert or Accredited Auditor logo for individual use and only while their accredited status is maintained in the Expert/Auditor Directory. It must not be used in a way that misleads the public regarding the individual (or their company) that has been accredited. The logo must not be altered and must retain its scale and legibility.

All Accounting for Nature® Method Author Approved Users are eligible to use the Accounting for Nature® Accredited Method logo only while the Method remains active and valid as an Accredited Method and is listed in the Method Catalogue. It must not be used to mislead the public into thinking another project, Method, individual or company has been accredited. The logo must not be altered and must retain its scale and legibility.

AfN is committed to preserving the integrity of the Framework and maintaining the trust that our clients and the public have in the Accounting for Nature® brand. The Framework permits Approved Users to use relevant Trustmark and associated marketing assets which recognise and promote the work they have done to measure the Condition of the Environmental Assets on their property or as part of an Account. The conditions for use of the Accounting for Nature® Certified–Independent Audit Trustmark, Certified–AfN Verified Trustmark and other associated trademarks and marketing assets are prescribed in this document.

The Accounting for Nature® marketing assets include:

- the Certified–Independent Audit Trustmark, a simple, credible Trustmark that is awarded to Proponents who have created and had their Environmental Accounts independently audited in accordance with the Framework;
- the Certified–AfN Verified Trustmark for Proponents who choose not to have their Environmental Account independently audited but instead submit their Environmental Account for an AfN Technical Assessment;
- The 'Registered' Account badge for Approved Users who have completed formal registration of an Account and undergoing the process of an Environmental Account under the Accounting for Nature<sup>®</sup> Framework. Accuracy Level badges, to recognise the level of scientific rigour applied to the measurement of specific assets in an Environmental Account;
- the Environmental Asset Class badges for simple visualisation of the Assets included in the Environmental Account;
- Econd® and Pcond devices, including scores, targets and changes;
- Environmental Market and/or Cultural Condition badges;
- Accredited Expert and Accredited Auditor logo;
- Accredited Method logo;
- Certification Passport, and;
- the use of associated trademarks (including "Accounting for Nature<sup>®</sup>" and "Econd<sup>®</sup>").

The use of Accounting for Nature<sup>®</sup> Trustmarks, trademarks and marketing assets are governed by the Accounting for Nature<sup>®</sup> Certification License Agreement which defines the terms and conditions of use and is signed between AfN and the Approved User before the visual assets may be used.

### 5.2 Authorised User

An Authorised User is an individual, organisation, or entity that have official licensing arrangements with AfN and are eligible to use the Accounting for Nature<sup>®</sup> Company Logo for marketing of joint initiatives.

**All Authorised Users** must have received formal written approval to use the Accounting for Nature® Company Logo and marketing assets. Formal Agreements or Partnerships can be established with or without an accompanying Accounting for Nature® Certified Environmental Account. For this reason, the use of the Accounting for Nature® Company Logo must not misrepresent that the user has an Accounting for Nature® Certified Environmental Account. Organisations and/or individuals are only permitted to Claim a general association with AfN (see 5.2.1 below) and its associated trademarks where:

- a current and signed Collaboration Memorandum of Understanding (MOU) exists between the organisation/individual and AfN; or
- the organisation/individual is considered an active Proponent of AfN i.e. they have a registered and/or Certified Environmental Account under the Accounting for Nature® Framework; or
- a training or other advisory contract is currently active between the organisation/individual and AfN; or
- AfN has expressly granted the organisation/individual the right to Claim an association.

### 5.2.1 Claims related to an association with Accounting for Nature Ltd

Where a Claim of association with Accounting for Nature Ltd is permitted, this Claim must not imply that the organisation/individual is a 'partner' or 'in partnership' with AfN. This is because AfN is an independent certification body that treats every organisation and individual it works with on an equitable basis. Organisations providing AfN with support (e.g., through grants) and who are not seeking Environmental Account Certification are excluded from this clause.

Instead, organisations/individuals may use the terms "using the Accounting for Nature® Framework" when developing Environmental Accounts intended to be Certified– Independent Audit or Certified –AfN Verified.

In written/published communications where the "Accounting for Nature" (when referring to the Framework) and/or the "Econd" Trademark is mentioned, the Registered Icon (®) must be included appropriately. Please note that the Registered Icon is not included when mentioning Accounting for Nature Ltd (when referring to the organisation), the Pcond, or if using an abbreviation (such as 'AfN').

### 5.3 Trustmark & trademark usage

Approved Users can use the Trustmark in accordance with the Accounting for Nature<sup>®</sup> Certification License Agreement, Claims and other applicable Rules documents. Approved Users must not mispresent their activities or seek to mislead clients or the public when using Accounting for Nature<sup>®</sup> Trustmarks and associated trademarks and marketing assets.

Accounting for Nature® Trustmarks can be used on:

- Communications about their Certified Environmental Account.
- Marketing materials related to their Certified Environmental Account.
- On these materials, the Trustmark;
  - Must always be accompanied by the unique Certification ID number, QR code and/ or reference to your account registry webpage on our website accountingfornature.org,
  - Video materials should have the URL included on the place where the video is hosted (e.g., youtube video description, website, email newsletter, etc).

• Packaging application must be requested for approval by Accounting for Nature before use.

Refer to the **Trustmark Guidelines**<sup>22</sup> for guidance on how Accounting for Nature<sup>®</sup> Trustmarks, trademarks and associated marketing assets are permitted to be used.

**Note:** Users are assigned a unique certification ID number as part of their Certification License Agreement. **This ID number must be used on all applications or use of the Trustmark.** The unique certification ID number is applied to the Trustmark by AfN and provided to each proponent when the Environmental Account is Certified. This number must not be added to the Trustmark by users and can only be applied by Accounting for Nature.

### 5.4 Use of Accompanying text

To ensure the use of Accounting for Nature<sup>®</sup> Certification Trustmark is not misinterpreted by the public, **the Certification Trustmark should, where possible, be displayed with additional text information.** 

Claims that meet the minimum requirements (section 4.3) should be included in the relevant material if the Certification Trustmark is displayed on websites or marketing materials like brochures or flyers. Alternatively, the following text can be included:

### Example Claim for use on marketing materials:

- "This Trustmark means that [PROPONENT] has measured the condition of Environmental Assets at [ENVIRONMENTAL ACCOUNT NAME (ID)] according to the science-based Accounting for Nature® Standard. For more information <u>click here</u> (for websites) OR QR code (for printed material) or <u>www.accountingfornature.org/[account page url]</u>".

AfN will generate a unique QR code for each Certified Environmental Account, to be used in accordance with these rules (see **Trustmark Guidelines**). The QR Code will direct the user to the Environmental Account Registry page, which will provide key details regarding the Environmental Account, including a summary of the Account and links to the Information Statement and Certification Passport.

**Important:** Each Certified Accounting for Nature<sup>®</sup> Environmental Account listed publicly in the Environmental Account Registry is provided with a unique URL and QR code (integrated into the Trustmark) which Proponents must use as a source of provenance or substantiation when making Claims that include reference to Accounting for Nature<sup>®</sup> and the Econd<sup>®</sup>. This includes in documents, on websites, in videos and on product packaging.

<sup>&</sup>lt;sup>22</sup> Available to Proponents once their Environmental Account has been Certified.

### 6 Compliance with these Rules

Proponents must comply with all general and specific rules set out in these Claims Rules.

Effective communication regarding the performance of Accounting for Nature® Certified Environmental Accounts under the Accounting for Nature® Framework is crucial for decision-makers to better manage degraded ecosystems, direct the flow of natural capital investment and help inform consumer purchasing.

It is the Approved User's responsibility to ensure that all Claims and the use (for any purpose) of the Accounting for Nature<sup>®</sup> Company Logo, Trustmarks, trademarks, and marketing assets is compliant with the Claims Rules, Accounting for Nature<sup>®</sup> Standard, Accounting for Nature<sup>®</sup> Certification Licence Agreement, Trustmark Guidelines, and other relevant documents under the Framework.

An Approved User may be requested to provide any material containing these elements or Environmental Account Claims to AfN for review.

AfN reserves the right to review the material (including the Claims) to determine if it meets the requirements of these Claims Rules and other relevant Accounting for Nature<sup>®</sup> documents to ensure there is no breach of the Accounting for Nature<sup>®</sup> Standard and Accounting for Nature<sup>®</sup> Certification License Agreement.

Complex Claims must be well considered, and these Rules (Section 4.4) set out <u>additional</u> compliance obligations that are specific to certain Claims (and end uses) regarding:

- Claims such as 'sustainably managed', 'nature positive', 'regenerative' or similar;
- certifying environmental gains, uplift or co-benefits from carbon offset projects;
- drawing conclusions on where activities result in environmental gains/uplift (using counterfactual analysis to establish cause-and-effect);
- issuance of standalone nature/biodiversity credits;
- historical environmental condition; and,
- Condition Targets.

**Important**: If a Proponent is unsure whether their Claims material comply with these Rules, they are encouraged to contact AfN via <u>certification@accountingfornature.org</u>.

### 7 Non-compliance with these Rules

If AfN identifies any non-compliant Claims or the use of the Accounting for Nature<sup>®</sup> Company Logo, Accounting for Nature<sup>®</sup> Trustmark, trademarks and associated marketing assets, the Approved User (or responsible party) will be notified of the breach in writing and required to amend the non-compliant Claim or marketing collateral accordingly. In serious cases of non-compliance, AfN may ask the Approved User (or responsible entity) to issue a public statement informing the market of the error in the Claim or marketing material being made.

Should the Approved User (or responsible entity) fail to comply with AfN's requests to rectify the Claim or marketing material, AfN reserves the right under the Accounting for Nature<sup>®</sup> Certification Licence Agreement to undertake one or more of the following in accordance with AfN's process for managing non-compliant claims:

- Issue a public statement informing the market of the unauthorised Claim or use of Accounting for Nature<sup>®</sup> Trustmark, trademarks and associated marketing assets.
- Decertify the Approved User's Certified Environmental Account to which the noncompliant Claim or marketing material relates to; and potentially,
- Issue a public statement informing the market that the Certified Environmental Account to which the non-compliant Claim/marketing material relates to has been "decertified due to non-compliance".



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