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1 **On track to achieve No Net Loss of forest at Madagascar's biggest mine**

2 Katie Devenish^{1#}, Sébastien Desbureaux², Simon Willcock^{1,3}, Julia P G Jones¹

3 ¹ School of Natural Sciences, Bangor University, Bangor, Gwynedd, LL57 2DG, UK.

4 ² Center for Environmental Economics – Montpellier (Univ. Montpellier, CNRS, INRAE,
5 Montpellier SupAgro), Montpellier, France

6 ³ Rothamsted Research, Harpenden, Hertfordshire, AL5 2JQ, UK.

7

8 # Corresponding author: Katie Devenish, ktd19ycv@bangor.ac.uk

9

10 **Abstract**

11 Meeting the Sustainable Development Goals requires reconciling development with
12 biodiversity conservation. Governments and lenders increasingly call for major industrial
13 developments to offset unavoidable biodiversity loss, but there are few robust evaluations of
14 whether offset interventions ensure No Net Loss (NNL) of biodiversity. We focus on the
15 biodiversity offsets associated with the high-profile Ambatovy mine in Madagascar and
16 evaluate their effectiveness at delivering NNL of forest. As part of their efforts to mitigate
17 biodiversity loss, Ambatovy compensate for forest clearance at the mine site by slowing
18 deforestation driven by small-scale agriculture elsewhere. Using a range of methods, including
19 extensive robustness checks exploring 116 alternative model specifications, we show that the
20 offsets are on track to avert as much deforestation as was caused by the mine. This
21 encouraging result shows that biodiversity offsetting can contribute towards mitigating
22 environmental damage from a major industrial development, even within a weak state, but
23 there remain important caveats with broad application. Our approach could serve as a
24 template to facilitate other evaluations and so build a stronger evidence-base of the
25 effectiveness of No Net Loss interventions.

26 **Keywords:** mitigation hierarchy; environmental impact assessment; Net Gain; Net Positive
27 Impact; forest conservation; biodiversity offset; impact evaluation; counterfactual; statistical
28 matching

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32

33 **Main text**

34 **Introduction**

35 The UN Sustainable Development Goals underline the importance of economic growth and
36 infrastructure development in alleviating poverty, while at the same time emphasising that
37 halting biodiversity loss is vital for global prosperity^{1,2}. Policies aimed at delivering No Net Loss
38 (NNL) of biodiversity, in theory, allow development to proceed whilst avoiding environmental
39 damage^{3,4}. NNL depends on implementation of the mitigation hierarchy: damage to
40 biodiversity resulting from development must first be avoided, minimised and restored⁵, and
41 any residual biodiversity loss offset through equivalent gains elsewhere⁶. One hundred and
42 one countries either mandate some form of biodiversity compensation or support voluntary
43 measures⁷. In countries with less established environmental governance, lender
44 requirements, such as the International Finance Corporation performance standards, are
45 important drivers of NNL commitments^{8,9}. Over 12,000 biodiversity offsets exist worldwide¹⁰,
46 yet evaluations of their effectiveness are rare and most do not use robust methods¹¹.

47 Offsets generate gains in biodiversity by creating or restoring habitat, or protecting existing
48 habitat which would have otherwise been lost (so called 'averted loss' offsets¹²). Offsets are
49 controversial due to questions of permanence³, equivalence⁶, equity^{13,14}, and for generating
50 gain against a background rate of biodiversity decline^{4,15}. However, where high-quality habitat
51 remains but is threatened by unregulated sectors, averted loss offsets may result in the best
52 possible biodiversity outcomes¹⁶. Biodiversity is an inherently complex concept so proxy
53 measures are used to calculate losses and gains⁶. In forested ecosystems where the majority
54 of species are forest-dependent, forest loss can be a useful measure.

55 Quantifying the biodiversity gains from averted loss offsets requires estimation of the
56 counterfactual scenario – the loss which would have occurred without protection¹⁵. While the
57 counterfactual is inherently unknowable, statistical approaches exist to approximate it and
58 consequently evaluate the impact of interventions on outcomes such as deforestation¹⁷⁻¹⁹.

59 Statistical matching is commonly used to estimate the counterfactual based on outcomes in
60 matched control units, yet can be contingent on arbitrary modelling choices²⁰. Recent
61 advances which test the robustness of estimates to a range of valid, alternative matching
62 model specifications²⁰ and different regression models^{18,21} can improve the quality of
63 inference.

64 The Ambatovy nickel and cobalt mine (Fig. 1) is one of the largest lateritic nickel mines in the
65 world. It is located within the biodiversity-rich eastern rainforests of Madagascar which are
66 highly threatened by deforestation, driven principally by shifting agriculture^{22,23}. From the
67 outset, Ambatovy promoted itself as a world-leader in sustainable mining and committed to
68 ensure NNL, and preferably net gain, of biodiversity^{24,25}. Its offset strategy was a pilot for the
69 influential Business and Biodiversity Offset Programme²⁴ which shaped guidelines widely
70 used in mitigating biodiversity loss from development^{16,25}. We use statistical matching and
71 regression models to estimate the avoided deforestation achieved by Ambatovy's four
72 biodiversity offsets and check the robustness of our results to 116 alternative matching model
73 specifications (Fig. 2). We provide encouraging evidence that this high-profile project, in one
74 of the world's hottest biodiversity hotspots, is on track to achieve No Net Loss of forest and
75 critically reflect on this finding in the broader context of NNL.

76

77 **Results**

78 Ambatovy's offset strategy is based on averted loss. It aims to generate biodiversity gains to
79 offset the losses incurred at the mine site by preventing an equivalent amount of biodiversity
80 loss within four biodiversity offset sites (which face a high rate of deforestation from shifting
81 agriculture)²⁴. To this end the company, and its NGO partners, implemented conservation
82 activities aimed at slowing forest clearance within the four offsets. These included ecological
83 monitoring, establishing community forest management associations and supporting them
84 with the monitoring and enforcement of resource-use restrictions, environmental education

85 programmes and promoting alternative income-generating activities in surrounding
86 communities^{26,27}. Occasionally the local police are brought in to assist with enforcement²⁷.

87 According to our site-based difference-in-differences regressions (see methods) of the four
88 biodiversity offsets associated with the Ambatovy mine, two significantly reduced deforestation
89 relative to the counterfactual (Ankerana and the Conservation Zone; $p < 0.01$). Protection
90 reduced deforestation by an average of 96% (95% CI: 89 to 98%; $p < 0.001$, $N = 38$) per year
91 in Ankerana and 66% (27 to 84%; $p < 0.01$, $N = 38$) per year in the Conservation Zone (Fig. 3;
92 Supplementary Table 9). One offset showed no significant effect (Torotorofotsy; -41 to +510%;
93 $p = 0.28$, $N = 38$), while the remaining offset (Corridor Forestier Analamay-Mantadia [CFAM])
94 could not be assessed due to the lack of parallel trends in outcomes between the offset and
95 matched control sample in the pre-intervention period - a critical assumption in difference-in-
96 difference analyses. In CFAM, there was a significant declining trend in deforestation prior to
97 protection whilst the matched control sample showed a significant increasing trend
98 (Supplementary Fig. 5). Therefore, CFAM could not be used in the difference-in-differences
99 analysis.

100 Including all four offsets in a single analysis using a fixed effects panel regression (see
101 methods), we estimate that protection reduced deforestation by an average of 58% per year
102 (95% CI: 37 to 73%, $N = 152$) across all 4 biodiversity offsets, relative to the estimated
103 counterfactual (Fig. 3). We also tested the effect of excluding CFAM and estimate a greater
104 reduction in deforestation of 72% per year (54 to 83%, $N = 114$; Supplementary Table 12 and
105 Supplementary Fig. 8). Given the two estimates are not significantly different (Z test, $p > 0.2$),
106 we present the more conservative estimate, which incorporates the effect of all four offsets,
107 as our main result. Our results are also robust to the alternative specification of site and year
108 as random effects (-53%, -27 to -69%; Supplementary Table 12).

109

110 **Results robust to alternative model specifications**

111 Arbitrary modelling choices, particularly associated with the decisions made in a matching
112 analysis, are inevitable yet can exert a significant influence on estimated impacts²⁸. Following
113 Desbureaux²⁰ we show that our results are robust to 116 alternative matching model
114 specifications, all of which are *a priori* valid (Fig. 4). The vast majority of models for both
115 Ankerana and the Conservation Zone confirm the results from the main model specification
116 (see Methods for details of the main model), presented in Fig. 3, of significant avoided
117 deforestation. Where some models show an insignificant result (e.g. for the Conservation
118 Zone), in most cases these models are not *a posteriori* valid. By this we mean that more than
119 90% of treated units were unmatched (i.e. a match within the caliper of the statistical distance
120 measure could not be found), mean covariate balance exceeded the accepted threshold, or
121 parallel trends were not achieved. Exploring alternative model specifications also did not
122 substantially change our results for Torotorofotsy; 78 of the 79 *a posteriori* valid models
123 showed no significant impact of protection on deforestation, one suggested protection was
124 associated with an increase in deforestation. For CFAM, the vast majority of alternative
125 specifications, like our main model, were not *a posteriori* valid as they failed the parallel trends
126 test. Of the 7 *a posteriori* valid models, 6 showed no significant effect whilst one showed
127 protection was associated with a significant increase in deforestation relative to the
128 counterfactual. Our result of a significant overall reduction in deforestation across all four
129 offsets from the fixed effects panel regression was robust for 106/116 alternative model
130 specifications and none showed a significant increase in deforestation. Therefore, the
131 evidence of avoided deforestation presented in Fig. 3 is robust.

132 We explored which modelling choices had the greatest influence on estimated impacts and
133 found that the choice of statistical distance measure and model parameters had the most
134 consistent, significant effect whilst the effect of including additional covariates is mixed
135 (Supplementary Table 13).

136

137 **No Net Loss of forest nearly achieved by the offsets**

138 The mine has destroyed or significantly degraded 2,064 ha of natural forest at the footprint
139 and upper reaches of the slurry pipeline (henceforth mine site)²⁴. The offsets have been in
140 operation for between 7 and 12 years. Using site-based difference-in-differences regressions
141 we estimate that between the year of protection and January 2020, 1,922 ha (95% CI: 669 –
142 5,260 ha) of deforestation has been avoided within Ankerana, and 26 ha (5 – 71 ha) has been
143 avoided within the Conservation Zone (Fig. 5; see Supplementary Methods). This equates to
144 1,948 ha of total avoided deforestation (over 94% of the forest loss caused by the mine), with
145 the majority achieved in Ankerana. Using the fixed effects panel regression incorporating all
146 four offsets, we estimate an overall reduction in deforestation of 1,644 ha (674– 3,122 ha)
147 between 2009, when the first offset was protected, and January 2020 (Fig. 5). This represents
148 more than 79% (33 – 151%) of the forest loss caused by the mine. From 2014, when all the
149 offsets became protected, an average of 265 ha of deforestation was avoided each year until
150 2020. If this rate continued, by the end of 2021 2,174 ha of deforestation will have been
151 avoided, fully offsetting forest loss at the mine site. Using the upper and lower bounds of
152 estimated avoided deforestation (674 ha and 3,122 ha) suggests NNL will be achieved
153 between 2018 and 2033. In 2014 the company estimated they would achieve NNL between
154 2022 and 2035²⁴. Our data therefore suggests Ambatovy is on track to achieve NNL of forest
155 earlier than anticipated.

156 Our estimate of the reduction in deforestation achieved within the Conservation Zone (26 ha,
157 1.6% of the total reduction in deforestation achieved within the offsets) is likely attributable to
158 a combination of conservation management and the site's location within the mining
159 concession. The company and its predecessor (Phelps Dodge Madagascar) have been
160 present in the concession area since the early 1990s, albeit with a hiatus from 1998 to 2003
161 (Supplementary Fig. 1). Therefore, for most of the 19 year study period, access to the
162 concession area, including the Conservation Zone, has been restricted²⁷. This de-facto
163 protection reduced deforestation within the Conservation Zone to low levels before it was
164 officially designated as an offset (Fig. 6).

165 A number of studies have documented leakage effects from conservation interventions
166 whereby impacts within the project area are simply displaced outside the boundaries, negating
167 the effect of the intervention at the landscape-scale²⁹. These leakage effects are not observed
168 in our analysis of Ambatovy's offsets (Supplementary Results) as we found that protection of
169 the biodiversity offsets had no significant effect on deforestation within a 10km radius
170 (Supplementary Table 16; $p = 0.15$).

171 **Putting these results in a broader context**

172 Despite two thirds of the 12,000+ biodiversity offsets which have been implemented worldwide
173 occurring within forested ecosystems¹⁰, by 2019 less than 0.05% of these had been evaluated
174 to assess the effectiveness of forest offsets at achieving NNL, and none of these evaluations
175 used robust methods¹¹ (although there have been several robust evaluations of wider offset
176 policies^{12,30}). This makes our estimation of the effectiveness of Ambatovy's biodiversity offsets
177 at avoiding deforestation valuable. Our results suggest that by January 2020, the mine had
178 offset 79% (33 – 151%) of the forest loss incurred at the mine site and is on track to achieve
179 NNL by the end of 2021.

180 In recent years there has been an explosion of studies using robust counterfactual methods
181 to evaluate the effectiveness of other conservation interventions aimed at slowing tropical
182 deforestation. Borner et al¹⁹ synthesise these findings, using Cohen's d normalised effect sizes
183 to compare the effectiveness of 136 conservation interventions at reducing deforestation.
184 Converting our estimate of the total avoided deforestation achieved by Ambatovy's biodiversity
185 offset policy (1,644 ha according to the fixed effects model) to a Cohen's d effect size yielded
186 an estimate of -0.51 (classed as a 'medium effect'³¹; see Supplementary Results). This
187 increases to -1.03 for the individual effect of Ankerana and -0.63 for the Conservation Zone
188 (classed as 'large effects'³¹). Comparison to the normalised effect sizes of the 136 other
189 conservation interventions compiled by Borner et al shows that overall Ambatovy's biodiversity
190 offsets were more effective at reducing deforestation than 97% of the other interventions and
191 all bar one of the protected area interventions (Supplementary Fig. 10).

192

193 **Discussion**

194 We lack the empirical evidence to explain why Ambatovy's offsets, as a whole, were so
195 successful at reducing deforestation compared to other forest conservation interventions. We
196 speculate this may stem from the fact that offsetting is inherently centred on achieving
197 measurable impact (No Net Loss). All activities are designed specifically to meet this goal and
198 progress can be regularly evaluated. Furthermore, large companies may possess the
199 sufficient funds to ensure, when they are committed, that they deliver this outcome. In contrast,
200 public protected areas tend to be more focussed on measures such as coverage and
201 investment and less explicitly impact-oriented³². Another important question is why
202 conservation efforts were so successful in Ankerana but not in Torotorofotsy. It may be that
203 enforcement of conservation restrictions was particularly effective within Ankerana, supported
204 by evidence that local communities lost access to resources after the site was protected²⁷
205 (discussed in more detail below).

206 **Methodological caveats**

207 An important caveat to our positive central result relates to the uncertainty inherent in impact
208 evaluation using observational data³³. The validity of causal inference rests on our ability to
209 accurately model the counterfactual deforestation in the offset sites (what would have
210 happened in the absence of the intervention) using data from matched pixels in the wider
211 landscape which were not protected as offsets. In difference-in-differences analyses this
212 assumes that all important factors influencing selection to treatment and the outcome of
213 interest have been controlled for (or proxied) in the matching, so that the matched offset and
214 control samples have similar trends in deforestation prior to the intervention³³. Omitted
215 variables may leave outstanding differences between the two samples which can bias
216 results³³. Our choice of matching covariates is based on a good understanding of the local
217 drivers of deforestation and selection to the treatment^{22,23} (see Supplementary Methods), and

218 our robustness checks demonstrate our results are robust to alternative specifications (Fig.
219 4).

220 Our small sample size (N = 38 for the difference-in-differences regressions), limited by the
221 length of the time series of the deforestation data³⁴, reduces the precision of our estimates. In
222 addition, methods for impact evaluation using observational data are constantly evolving with
223 recent research highlighting the challenges of evaluating projects with staggered
224 implementation dates³⁵. Despite these caveats, which are the result of inherent challenges
225 from such a real-world evaluation, our methodology represents a substantial advance in
226 impact evaluation applied to biodiversity offsets. Whilst our results seem relatively robust to
227 alternative modelling specifications, this is only one case study. We hope this work will
228 stimulate further impact evaluations of biodiversity offsetting and emphasize the importance
229 for future researchers to take considerable care over data selection and modelling choices
230 (particularly the matching covariates, distance measure and model parameters) to ensure
231 analyses are context-specific, appropriate, and robust.

232 **Wider concerns with offsetting**

233 Biodiversity offsets in general, and averted loss offsets in particular, are controversial^{16,36,37}.
234 General criticisms include whether a concept as complex as biodiversity can be meaningfully
235 reduced to proxies, questions of permanence^{3,38}, and the potential social and equity issues of
236 trading biodiversity (including access to ecosystem services) in one place for that in
237 another^{13,14}. Specific criticisms of averted loss offsets focus on the accuracy of counterfactual
238 scenarios of loss against which gains are measured^{4,36} and the mismatch between stakeholder
239 expectations and how much averted loss offsets can actually deliver^{16,37}. We explore each of
240 these criticisms in turn. In all cases they present clear and important caveats to our positive
241 central result.

242 The aim of Ambatovy's offset policy is to achieve No Net Loss of biodiversity, whereas our
243 study uses forest cover as an imperfect proxy. Rarely is the appropriate biodiversity data at

244 the required spatial and temporal scale available to facilitate independent evaluation of NNL
245 commitments. In forested ecosystems where most species are forest-dependent³⁹, forest loss
246 is a transparent, and crucially measurable³⁴, proxy for biodiversity loss. Furthermore, offsetting
247 development-induced deforestation to achieve NNL of forest is a desirable outcome in itself,
248 given its implications for biodiversity, ecosystem services and carbon storage. However, our
249 measure of deforestation³⁴ does not capture damage to forest biodiversity occurring at smaller
250 scales, from activities such as selective logging, artisanal mining and harvesting of forest
251 products for food, fuel, and building materials⁴⁰. More significantly, our method does not
252 capture outcomes for species. In a context of high microendemism with many threatened
253 species there is a real risk large developments such as Ambatovy could lead to species
254 extinction. To mitigate this risk the company surveyed areas scheduled for clearance to
255 identify, catch and relocate priority species to conservation areas outside the mine footprint
256 (see Supplementary Methods for other mitigation measures), and conducted follow up
257 monitoring of certain species²⁴. Whether the impacts of the mine on biodiversity are truly offset
258 will depend on species responses to the changing pressures as well as the presence and
259 efficacy of protection of these species within the offsets, which we were unable to capture in
260 our analysis.

261 While we present strong evidence that Ambatovy has effectively conserved forest within its
262 biodiversity offsets, questions remain regarding the likely permanence of this achievement.
263 Although Ankerana and Torotorofotsy have been incorporated into the national protected area
264 network and CFAM has been proposed as a new protected area²⁶, continued effective
265 management after the mine's involvement ceases remains in doubt, given chronic under-
266 investment in Madagascar's protected areas⁴¹. If the offsets become de-facto unprotected
267 after the company pulls out (expected between 2040 and 2050²⁴), deforestation is likely to
268 resume and forest within the previously protected offsets may be lost. Offsets are intended to
269 persist for as long as the impacts of the development remain³. Although Ambatovy have
270 committed to restoring the impact site and have taken steps to prepare, tropical forest

271 restoration is notoriously difficult⁴². If restoration fails, and the offsets are no longer protected,
272 a future acceleration in biodiversity loss will jeopardise Ambatovy's claims to NNL.

273 Communities around Madagascar's forests depend on forests for land to practice shifting
274 agriculture and to provide wild products for food, fuel, and building materials^{22,27}. The mine
275 and its associated biodiversity offsets have removed or reduced access to these provisioning
276 ecosystem services. To compensate for this loss of access, Ambatovy invested in promoting
277 alternative income-generating activities (including training and the provision of materials) in
278 communities around the mine site and offsets^{26,27}. However, research conducted within four
279 affected communities (two near the Conservation Zone and two near Ankerana) found that
280 local people did not consider these benefits to outweigh the significant opportunity costs of the
281 conservation restrictions²⁷. The compensatory activities failed to reach those most affected by
282 the restrictions, and there was a temporal mismatch between the immediate loss of access to
283 resources following establishment of the offsets, and the time required for the alternatives to
284 yield benefits²⁷. This indicates that poor, rural communities living around the biodiversity
285 offsets are bearing the cost of achieving NNL. For infrastructure developments such as
286 Ambatovy to truly contribute towards sustainable development, SDG 1 (No Poverty) cannot
287 be traded-off for SDG 15 (Life on Land). Instead, project proponents should strive to achieve
288 No Net Loss for both people and planet¹⁴.

289 An important criticism of averted loss offsets focuses on the accuracy of estimation of the
290 counterfactual scenario; the baseline against which biodiversity losses and gains are
291 measured⁴. Many offset policies use historical background rates of deforestation to define the
292 counterfactual, but previous studies have shown that this can overestimate the deforestation
293 which would have occurred and consequently overstate the impact of the intervention^{17,38}. We
294 found that the baseline deforestation rates used by Ambatovy in their loss-gain calculations
295 (based on the highest and lowest background deforestation rates at the district level between
296 1990 and 2010²⁴) are actually lower than the counterfactual rates we estimate here using
297 robust methods for impact evaluation, meaning their estimates were conservative

298 (Supplementary Table 1). However, there is an important caveat to this: the mine resulted in
299 in-migration to the region^{26,27} which may have indirectly increased pressures on forest
300 resources within the wider landscape, as observed with Rio Tinto's QMM ilmenite mine in
301 Southern Madagascar³⁸. If any mine-related pressures were captured within the period used
302 to define the 'background' rate of deforestation this would no longer represent baseline
303 conditions in the absence of the mine and inflate the counterfactual (and the resulting
304 estimates of biodiversity gains). Ambatovy employs approximately 9000 people²⁶, many of
305 whom moved to the area from other regions of Madagascar^{26,27}. The influx of migrant workers
306 likely increased local demand for food, charcoal and fuelwood, which may have increased
307 forest clearance and bushmeat hunting^{26,43}. Such indirect impacts associated with industrial
308 development are notoriously difficult to quantify and therefore offset⁴⁴. Neither our approach,
309 nor Ambatovy's loss-gain calculations, could account for the indirect impacts of the mine on
310 regional deforestation.

311 Another criticism of averted loss offsets is that they are premised on a background rate of
312 biodiversity decline which can be slowed to generate the required biodiversity gains^{4,16}.
313 Therefore, even if 'No Net Loss' as defined by best practice guidelines⁸ is achieved, loss of
314 biodiversity has still occurred^{36,37}. This is not what many stakeholders would understand as
315 No Net Loss of biodiversity⁴⁵. However, given Madagascar's high rates of deforestation⁴⁶, and
316 poor outcomes from tropical forest restoration⁴², averted loss is likely to be the better offsetting
317 option¹⁶. Yet Madagascar has little remaining forest left to lose. Given the importance of the
318 country's biodiversity and the multitude of threats facing it⁴¹, future developments could aim to
319 go beyond NNL and contribute towards the overall conservation of Madagascar's remaining
320 biodiversity¹⁶.

321 **Hope for mitigating the environmental impacts of mines**

322 There are over 6,000 industrial mines operating worldwide, covering an estimated 57,000 km²
323 ⁴⁷ and impacting around 10% of global forested lands⁴⁸. Low-income countries, like
324 Madagascar, desperately need economic development. Mining, if well-regulated, can be part

325 of the solution. From the start Ambatovy promoted itself as a world-leader in sustainable
326 mining and has some of the strongest commitments to conservation among 29 large-scale
327 mines operating within forests⁴⁸. Given this, and the resulting substantial investment the
328 company made in NNL, failure would have been worrying for the concept of mitigating
329 biodiversity loss from development. However, the achievements are notable, especially
330 considering the challenging institutional and political context⁴⁹ in which Ambatovy operates.
331 Our results provide encouraging evidence that Ambatovy's economic contributions to
332 Madagascar⁵⁰ (tens of millions of dollars a year), were made whilst minimising trade-offs with
333 the island's precious remaining forest habitat. There are many important caveats to this
334 finding, as to any claim of No Net Loss achieved through offsetting, however the result
335 certainly demonstrates the value of high aspirations combined with substantial investment in
336 mitigating the biodiversity impacts of mining.

337

338 **Methods**

339

340 **Study Site and context**

341 Ambatovy is a very large nickel, cobalt and ammonium sulphate mine in central-eastern
342 Madagascar owned by a consortium of international mining companies⁵¹. It represents the
343 largest ever foreign investment in the country²⁴ (\$8 billion by 2016⁵¹) and a significant source
344 of fiscal income⁵⁰. In 2018, the company contributed approximately \$50 million USD in taxes,
345 tariffs, royalties and other payments⁵⁰ and employed over 9,000 people (93% of whom were
346 Malagasy)⁵². Commercial production began in January 2014²⁴ (Supplementary Fig. 1). As key
347 components in batteries supply of nickel and cobalt is critical to the green energy transition
348 and demand for these metals is predicted to increase significantly in future⁵³.

349 The mining concession covers an area of 7,700 ha located in the eastern rainforests of
350 Madagascar (Fig. 1) which have very high levels of biodiversity and endemism^{54,55}. After

351 avoidance and minimisation measures were applied (Supplementary Methods) the mine was
352 predicted to clear or significantly degrade 2,064 ha of high-quality natural forest at the mine
353 footprint and upper pipeline²⁴. Any impacts on plantations or secondary habitat is not included
354 in this estimate. Losses at the impact site were not discounted in relation to a background rate
355 of decline meaning the company took responsibility for the full area of forest lost²⁵.
356 Independent verification by our team (by measuring the size of the mine footprint on Google
357 Earth) confirms the extent of forest loss at the mine footprint (Supplementary Fig. 2).
358 Clearance of the footprint accounts for most of the forest loss associated with the mine as
359 losses associated with the pipeline are small⁵⁵.

360 Ambatovy aims to generate biodiversity gains to offset the mine-induced losses by slowing
361 deforestation driven by shifting agriculture elsewhere²⁶. To this end the company designated
362 four sites, totalling 28,740 ha, to be protected as biodiversity offsets; Ankerana, Corridor
363 Forestier Analamay-Mantadia (CFAM), the Conservation Zone and Torotorofotsy⁵⁵ (Fig. 1).
364 The offsets are considered like-for-like³⁰ and were selected based on similarity to the impact
365 site in terms of forest structure and type, geology, climate, and altitude²⁴. The large combined
366 area of the offsets relative to the impacted area was designed to allow flexibility, account for
367 uncertainty and incorporate as many of the affected biodiversity components as possible²⁴.
368 Ankerana is the flagship offset, selected based on its size, connectivity to the CAZ forest
369 corridor and the presence of ultramafic outcrops thought to support the same rare type of
370 azonal forest lost at the mine site⁵⁵. Extensive surveys conducted within Ankerana to establish
371 biological similarity concluded the offset to be of higher conservation significance than the
372 forests of the mine site due to the presence of rare lowland tropical forest²⁴.

373 The Conservation Zone is directly managed by the company, given its location within the
374 concession area, whilst the other offsets are managed in partnership with local and
375 international NGOs^{24,25}. Ambatovy funds the management of Ankerana by Conservation
376 International and local NGO partners (although prior to 2015 Ankerana was directly managed
377 by Ambatovy via a Memorandum of Understanding with Conservation International²⁴),

378 supports BirdLife partner Asity with the management of Torotorofotsy, and a number of local
379 NGOs including Voary Voakajy²⁵ are involved in CFAM²⁶. The company is also working to
380 secure formal, legal protection for CFAM²⁶ as part of a proposed Torotorofotsy-CFAM
381 Complex New Protected Area (although progress on this has stalled).

382

383 **Overview of methods**

384 To estimate the impact of the offsets on deforestation and determine whether this has
385 prevented enough deforestation to offset forest loss at the mine site, we combined several
386 complementary methods for robust impact evaluation. First, we used statistical matching to
387 match a sample of pixels from each biodiversity offset to pixels from the wider forested
388 landscape with similar exposure to drivers of deforestation. Then we used a site-based
389 difference-in-differences regression for each matched offset-control sample, and a fixed
390 effects panel regression on the pooled data, to estimate the effect of protection. We
391 systematically explored how arbitrary modelling choices (including the statistical distance
392 measure used in matching, caliper size, ratio of control to treated units, matching with or
393 without replacement and which, if any, additional covariates were included) affected our
394 inference; exploring the robustness of our results to 116 alternative model specifications.

395

396 **Matching**

397 The former province of Toamasina was selected as the geographic area from which control
398 pixels were sampled as it encompasses forests of the same type as the concession area with
399 varying degrees of intactness and accessibility. The 4 biodiversity offsets are located within
400 this province (Fig. 1).

401 The unit of analysis is a 30 x 30 m pixel that was forested in the baseline year 2000^{46,56}. It is
402 important that the scale of analysis aligns with the scale at which the drivers of deforestation

403 (in this case, small-scale shifting agriculture) operate⁵⁷. The median agricultural plot size (from
404 564 measured plots) in the study region is approximately 36 m x 36 m⁵⁸. We took a sub-sample
405 of pixels to reduce computational effort whilst maintaining the capacity for robust statistical
406 inference^{59,60}. We used a grid-based sampling strategy ensuring a minimum distance between
407 sample units to reduce spatial autocorrelation⁶¹, and equal coverage of the study area⁵⁹. A
408 150m x 150m resolution grid, aligned to the other 30m resolution data layers (Fig. 1C), was
409 overlaid on the province and the 30x30m pixel at the centre of each grid square was extracted
410 to produce a sub-sample of pixels that are 120m away from their nearest neighbour. 120m is
411 larger than the minimum distance between units used in another matching study in
412 Madagascar (68m⁶⁰) but smaller than that used in other studies (200m⁶²), and so strikes an
413 appropriate balance between the avoidance of spatial autocorrelation and maximising the
414 possible sample cells.

415 Protected areas in the study area managed by Madagascar National Parks were excluded
416 from our control sample as they are actively managed and therefore do not represent
417 counterfactual outcomes for the biodiversity offsets in the absence of protection (Fig. 1).
418 However, control pixels were sampled from within the Corridor Ankeniheny-Zahamena (CAZ)
419 new protected area as legal protection was only granted in 2015 and resources for
420 management are limited and thinly spread⁶³. Additionally, Ankerana and parts of CFAM
421 overlap with the CAZ and would have experienced the same management, and likely
422 trajectory, as the rest of the CAZ, had they not been designated biodiversity offsets. Areas
423 within 10km of an offset boundary were excluded from the control sample to reduce the chance
424 of leakage (where pressures are displaced rather than avoided) biasing results^{17,29}. 10km was
425 selected as it is a commonly used buffer zone within the literature^{17,59}.

426 To test for leakage effects, we used Veronoi polygons to partition the buffer area for CFAM,
427 the Conservation Zone and Torotorofotsy (which overlap) into three individual buffer areas
428 according to the nearest offset centroid and took a sub-sample of pixels from each (Fig. 1).

429 Areas that overlapped with the established protected areas of Mantadia National Park and
430 Analamazotra Special Reserve were excluded from the buffer zones.

431 The outcome variable is the annual deforestation rate sourced from the Global Forest Change
432 dataset³⁴. Following Vieilledent et al⁴⁶ these data were restricted to only include pixels classed
433 as forest in a forest cover map of Madagascar for the year 2000^{46,56}, reducing the probability
434 of false positives (whereby tree loss is identified in pixels that were not forested). The resulting
435 tree loss raster was snapped to the forest cover 2000 layer to align cells, resulting in a
436 maximum spatial error of 15m. The Global Forest Change (GFC) product³⁴ has been shown
437 to perform reasonably well at detecting deforestation in humid tropical forests⁶⁴. In the North-
438 Eastern rainforests of Madagascar Burivalova et al⁴⁰ found GFC data performed comparably
439 to a local classification of very high resolution satellite imagery at detecting forest clearance
440 for shifting agriculture (although it was not effective at detecting forest degradation from
441 selective logging). As clearance for shifting agriculture is considered the principal agent of
442 deforestation in the study area²² and the forests of the study area are tropical humid (> 75%
443 canopy cover), the GFC data is an appropriate tool for quantifying forest loss. Although recent
444 evidence suggests GFC data may have temporal biases⁶⁵, this phenomenon likely affects our
445 control and treated samples equally and so is unlikely to impact our results.

446 The choice of covariates is extremely important in matching analyses. They must include, or
447 proxy, all important factors influencing selection to treatment and the outcome of interest so
448 that the matched control sample is sufficiently similar to the treated sample in these
449 characteristics to constitute a plausible counterfactual, otherwise the resulting estimates may
450 not be valid³³. Based on the literature and a local theory of change we selected 5 covariates
451 which we believe capture, or proxy for the aspects of accessibility, demand and agricultural
452 suitability which drive deforestation in the study area^{22,60,66,67}. These are slope, elevation,
453 distance to main road, distance to forest edge and distance to deforestation (see
454 Supplementary Methods for further details). These 5 essential covariates comprise the main
455 matching specification and form the core set used in all alternative specifications that we

456 tested in the robustness checks. We also defined 5 additional variables (annual precipitation,
457 distance to river, distance to cart track, distance to settlement and population density) and
458 tested the effect of including these in the robustness checks. The additional covariates were
459 so defined because they were of poorer data quality (population density, distance to
460 settlement), correlated with an essential variable (annual precipitation, population density) or
461 simply considered less influential (distance to river, distance to cart track; see Supplementary
462 Methods).

463 Statistical matching was conducted in R Statistics using the MatchIt package version 4.1⁶⁸. To
464 improve efficiency and produce closer matches we pre-cleaned the data prior to matching to
465 remove control units with values outside the calipers of the treated sample in any of the
466 essential covariates (see Supplementary Methods for details on caliper definition). Following
467 the recommendations of Schleicher et al⁶⁹ we tested several matching specifications and
468 selected the one which maximised the trade-off between the number of treated units matched
469 and the closeness of matches as the main specification (Supplementary Table 7). This was
470 1:1 nearest-neighbour matching without replacement, using Mahalanobis distance and a
471 caliper of 1 standard deviation. This specification produced acceptable matches (within 1
472 standard deviation of the Mahalanobis distance) for all treated units within all offsets. The
473 maximum post-matching standardised difference in mean covariate values between treated
474 and control samples was 0.05, well below the threshold of 0.25 considered to constitute an
475 acceptable match⁷⁰. This indicates that, on average, treated and control units were very well
476 matched across all covariates.

477 Matching was run separately for each offset. The resulting matched datasets were aggregated
478 by treated status (offset or control) and year to produce a matrix of the count of pixels that
479 were deforested each year (2001-2019) in the offset and the matched control sample.
480 Converting the outcome variable to a continuous measure of deforestation avoids the problem
481 of attrition associated with binary measures of deforestation and is better suited to the
482 framework of the subsequent regressions⁷¹.

483 **Robustness checks**

484 Statistical matching requires various choices to be made⁶⁹, many of which are essentially
485 arbitrary. There therefore exist a range of possible alternative specifications which are all a
486 *priori* valid (although some may be better suited to the data and study objectives⁷⁰) but which
487 could influence the results^{20,28}. We tested the robustness of our results to 116 different
488 matching model specifications (Fig. 4). First, we tested the robustness of the estimates to the
489 use of three alternative matching distance measures (standard propensity score matching
490 using generalized linear model regressions with a logit distribution, propensity score matching
491 using RandomForest, and Mahalanobis distance), three different calipers (0.25, 0.5 and 1SD),
492 different ratios of control to treated units (1, 5 and 10 nearest neighbours), and matching
493 with/without replacement. Holding the choice of covariates constant (using only the essential
494 covariates), the combination of these led to the estimation of 54 different models. Second, we
495 tested the robustness of results to the inclusion of the 5 additional covariates. Holding the
496 choice of distance measure and model parameters constant, we constructed 31 models based
497 on all possible combinations of additional covariates with the core set of essential covariates.
498 Finally, we explore the robustness of results for 31 randomly selected combinations of
499 distance measure, model parameters and additional covariates. All 116 specifications are a
500 *priori* valid, assuming the covariates capture or proxy for all important factors influencing
501 outcomes, but may fail to satisfy the parallel trends condition or produce matches for
502 insufficient number of treated observations (<10%), rendering them a *posteriori* invalid. It
503 remains important to test the assumptions of the alternative models as failure to do so may
504 lead to erroneous conclusions about effect size and direction being drawn from invalid models.
505 Results are presented through specification graphs based on codes developed in Ortiz-Bobea
506 et al⁷².

507 Additionally, we tested the robustness of our results from the site-based difference-in-
508 differences regressions to an alternative temporal specification using an equal number of
509 years before and after the intervention (8 for Ankerana and the Conservation Zone, 6 for

510 CFAM and 5 for Torotorofotsy) and dropping individual years from the analysis. This did not
511 change the significance or magnitude of our results (Supplementary Table 10, Supplementary
512 Figures 6 and 7).

513

514 **Outcome Regressions**

515 Deriving estimates of causal effect from statistical comparisons of outcomes between treated
516 and control samples relies on the assumption that the latter is a robust counterfactual for the
517 former. In a difference-in-differences analysis this assumes that in the absence of the
518 intervention the treated sample would have experienced the same average change in
519 outcomes over the before-after period as the control sample⁷³. Parallel trends in outcomes
520 between treated and control prior to the intervention is an essential pre-requisite for this
521 assumption. We tested this for each matched offset- control dataset using the following
522 formula:

$$523 \text{ Eqn 1: } \log(\text{count of deforestation} + 1)_{i,t} = \beta_0 + \beta_1 \text{Year}_t + \beta_2 \text{CI}_i + \beta_3 \text{Year} * \text{CI}_{it} \\ 524 + \epsilon_{i,t}$$

525 where the outcome is the $\log(y+1)$ transformed count of deforestation within sample i at year
526 t and CI is a binary variable indicating whether the observation is from the offset (1) or control
527 (0) sample.

528 Parallel trends in deforestation between offset and matched control samples in the years
529 before the intervention were present for all offsets except for CFAM (Supplementary Fig. 5).
530 Consequently, CFAM could not be used in the site-based difference-in-differences analysis.
531 However, its effect is still captured in the results from the fixed effects panel regression as this
532 is not based on an identifying assumption of parallel trends between groups in the pre-
533 treatment period⁷³.

534 To estimate the impact of protection within each individual offset we ran an ordinary least
535 squares difference-in-differences regression for each matched offset-control dataset using the
536 following formula:

$$\begin{aligned} 537 \text{ Eqn 2: } \log(\text{count of deforestation} + 1)_{i,t} &= \beta_0 + \beta_1 \text{BA}_t + \beta_2 \text{CI}_i + \beta_3 \text{BA} * \text{CI}_{i,t} + \\ 538 &\in_{i,t} \end{aligned}$$

539 where BA and CI are binary variables indicating whether the observation occurred before (0)
540 or after (1) the intervention, in the offset (1) or control sample (0). Given the non-normal
541 properties of count data and the presence of zero values a log(y+1) transformation was applied
542 to the outcome variable^{71,74}. The coefficient of BA*CI and the corresponding confidence
543 intervals were back-transformed (see Supplementary Table 9) to obtain an estimate of the
544 percentage difference in average annual deforestation between the offset and the matched
545 control sample after protection, controlling for prior differences between samples (i.e. the
546 estimated counterfactual).

547 To estimate the overall impact of Ambatovy's biodiversity offset policy at reducing
548 deforestation we pooled the data for all four offsets and their corresponding matched control
549 samples and ran a fixed effects panel regression. The pooled data (N = 152) comprise an
550 observation for each site (i=8, 4 offset and 4 control) for each year (t =19). The fixed effects
551 panel regression quantifies the effect of protection on the log-transformed count of
552 deforestation controlling for site and year fixed effects, according to the following formula :

$$553 \text{ Eqn: 3 } \quad \log(\text{count of deforestation} + 1)_{i,t} = \beta_0 + \beta_1 \text{Tr}_{i,t} + \alpha_i + \gamma_t + \epsilon_{it}$$

554 where Tr is a binary measure indicating the treated status of sample *i* in year *t* (Tr = 1 for
555 observations from offset sites in the years following protection and 0 for all other observations),
556 α_i and γ_t represent site and year fixed effects respectively and ϵ_{it} represents the composite
557 error. The coefficient of interest (β_1) and the associated confidence intervals were
558 backtransformed to obtain the percentage difference in average annual deforestation across
559 all four biodiversity offsets following protection (the treatment effect).

560 **Evaluating deforestation leakage**

561 To determine whether protection of the four biodiversity offsets simply displaced deforestation
562 into the surrounding forested landscape we repeated the matching and outcome regressions
563 with the sub-sample of units from each buffer zone assigned as the treated group^{17,59}
564 (Supplementary Results).

565

566 **Data availability statement**

567 All input data used in this study are available in the GitHub repository accessible here:

568 https://github.com/katie-devs/Biodiversity_offset_effectiveness.

569 **Code availability statement**

570 All computer code used in this study are available in the GitHub repository accessible here:

571 https://github.com/katie-devs/Biodiversity_offset_effectiveness.

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578

579 **Author contributions**

580 KD, SW and JPGJ conceived and designed the study with contributions from SD on the
581 statistical analysis. KD compiled the data. KD and SD performed the statistical analysis. KD,
582 SD and JPGJ wrote the paper.

583 **Competing interests**

584 Julia P G Jones co-authored a paper which was quite critical of the social impact of
585 Ambatovy's biodiversity offsets in 2017. She was later approached by the new leadership of
586 Ambatovy who asked if she could return to villages visited in that research to explore the
587 current situation. She collected independent information from a number of villages around
588 the Conservation Zone, Torotorofotsy and CFAM biodiversity offsets and fed this back to the
589 mine. This work was funded by an Economic and Social Research Council Impact
590 Accelerator Award to Julia P G Jones. She has never received any funding from Ambatovy.
591 The remaining authors declare no competing interests.

592

593 **Figure Legends**

594 **Fig. 1: Study area in eastern Madagascar showing the location of Ambatovy's**
595 **biodiversity offsets and our study design.** A) The study area is the former province of
596 Toamasina. Control pixels were sampled from pixels which were forested at baseline in 2000
597 (grey), excluding those within 10 km of a biodiversity offset, or within established protected
598 areas (grey dashed). The Corridor Ankeniheny-Zahamena (CAZ) new protected area was
599 included in sampling (see Methods). B) Ambatovy's four biodiversity offsets: the Conservation
600 Zone (yellow) which is within the mine concession area, the Corridor Forestier Analamay-
601 Mantadia (CFAM; green), Torotorofotsy (blue), and Ankerana (orange). The 10 km buffer zone
602 (which excludes established protected areas) around each offset is shown in lighter shades
603 and was used to explore deforestation leakage. C) Our grid-based sampling strategy (see
604 Methods). The top layer illustrates the selection of our sub-sample of pixels. Data layers
605 labelled x represent the outcome variable and covariates; all data used in this study are
606 publicly available (Supplementary Table 4).
607

608 **Fig. 2: Flowchart of methods.** Statistical matching was used to match sampled pixels from
609 each offset to control pixels sampled from the wider forested landscape with similar exposure
610 to drivers of deforestation (Supplementary Table 4). Difference-in-differences regressions
611 were run for each matched offset-control sample to estimate the effect of protection within
612 each offset (termed site-based difference-in-differences). Pooled data was used in a fixed
613 effects panel regression to estimate the impact of protection across the whole offset portfolio.
614 Resulting estimates were converted into hectares of avoided deforestation. To test the
615 robustness of results to arbitrary modelling choices, the matching and outcome regressions
616 were repeated using 116 alternative matching model specifications (Box A) to produce a range
617 of estimates (Box B). The statistical distance measure used in matching (e.g. Mahalanobis),
618 caliper size, ratio of matched control to treated units, and matching with or without replacement
619 (shades of blue/purple) were varied in all 54 possible combinations. Holding these choices
620 constant, we constructed 31 models based on all possible combinations of 5 additional
621 covariates (shown in shades of red/orange) with a core set of 5 essential covariates (green).
622 Finally, we explore the robustness of the results to 31 randomly selected combinations of
623 distance measure, model parameters and additional covariates.

624

625 **Fig. 3: The estimated percentage reduction in annual deforestation within each offset**
626 **(from the site-based difference-in-differences regressions) and overall, across the**
627 **entire offset portfolio (from the fixed effects panel regression).** The treatment effect is
628 expressed as the average percentage difference in annual deforestation between the offset(s)
629 and the estimated counterfactual following protection. Error bars represent 95% confidence
630 intervals (the upper bound for TTF extends to +510%). The width of the bar is proportional to
631 the area of forest within each offset at the year of protection (Supplementary Table 2). ANK:
632 Ankerana (orange), CZ: the Conservation Zone (yellow), TTF: Torotorofotsy (blue). Corridor
633 Forestier Analamay-Mantadia (CFAM; green) could not be included in the site-based
634 difference-in-differences analysis due to lack of parallel trends in the pre-intervention period
635 (Supplementary Fig. 5). N = 38 for Ankerana, the Conservation Zone and Torotorofotsy and
636 N = 152 for the Overall result.

637

638 **Fig. 4: Raw estimates of treatment effect (points) and corresponding 95% confidence**
639 **intervals (bars) derived from 116 alternative matching model specifications.** The
640 alternative specifications included 54 possible combinations of matching distance measure
641 and model parameters, 31 possible combinations of the 5 additional covariates with the core
642 set of essential covariates, and 31 randomly selected combinations of distance measure,
643 model parameters and additional covariates (see Methods). Results from our main model
644 specification, presented in Fig. 3, are shown in black. An asterisk indicates that the main model
645 was not *a posteriori* valid. All alternative specifications are *a priori* valid, but models that are
646 not *a posteriori* valid (i.e., more than 90% of treated units were unmatched, acceptable
647 covariate balance or parallel trends were not achieved) are shown in lighter shades. See
648 Supplementary Fig. 11 and 12 for full details of parameters and covariates associated with
649 each result. Values are reported un-transformed and represent the effect of treatment on the
650 $\log(y + 1)$ transformed count of annual deforestation.

651

652 **Fig. 5: The total observed, counterfactual and the resulting estimate of avoided**
653 **deforestation within each offset (estimated using site-based difference-in-differences**
654 **regressions) and overall (using the fixed effects panel regression) between the year of**
655 **protection and January 2020.** The counterfactual is an estimate of the deforestation which
656 would have occurred in the absence of protection and was calculated using the estimated
657 treatment effect (N= 38; Supplementary methods). Avoided deforestation is the difference
658 between the observed and counterfactual deforestation; negative values indicate the offset
659 resulted in a reduction in deforestation. The error bars show the 95% confidence interval of
660 the estimates of counterfactual deforestation (derived from the upper and lower confidence
661 intervals of the treatment effect) and the resulting estimates of avoided deforestation. The
662 green dashed line indicates the 2,064 ha of forest loss caused by the mine itself. The number
663 of years following protection is 9 for Ankerana, 11 for the Conservation Zone, 6 for
664 Torotorofotsy and 11 Overall (deforestation within later protected offsets is only counted from
665 the year of protection).

666

667 **Fig. 6; Comparison of the annual deforestation rate within the sample of pixels from**
668 **each offset and the matched controls over the whole study period.** The offset sample is
669 shown in colour whilst the matched control sample is shown in grey. The dashed line indicates
670 the year of protection. The offset and matched control samples contain an equal number of
671 pixels (2862 for Ankerana, 2626 for CFAM, 1340 for the Conservation Zone and 1170 for
672 Torotorofotsy) as the ratio of treated to control units in the matching was set to 1:1. For each
673 offset, N = 38.

674

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