

Text	BIAC Comment
“As such, the KMGBF also includes targets asking private actors to directly or indirectly contribute to the alignment of their activities and to mobilising resources for biodiversity (CBD, 2022[6]), including: • the progressive alignment of all relevant public and private entities and their financial flows with its goals and targets (target 14) (CBD, 2022[6]); • to assess and disclose biodiversity-related impacts, dependencies and risks, in order to align their operations and supply chains, and progressively reduce negative impacts on biodiversity and increase positive impacts (target 15) (CBD, 2022[7]); • increasing financial resources from all sources, including domestic, international, public and private resources for biodiversity action, by mobilising at least USD 200 billion per year by 2030 (target 19) (CBD, 2022[6]). • Goal D also calls to close the biodiversity finance gap and aligning financial flows with the KMGBF and its vision for biodiversity.” Page 5 And top of page 55, Box 4.5 “At a multilateral level, they can elevate biodiversity on global agendas through engagement in CBD, UNFCCC, or related international fora. For instance, donors are helping to structure the Cali Fund for the Fair and Equitable Sharing of Benefits from the use of Digital Sequence Information on Genetic Resources (DSI) – the Cali Fund – aiming to mobilise finance from the private sector entities making commercial use of DSI (CBD, 2025[262]) [an innovative financial mechanism to which, each year, users of DSI should contribute a percentage of their revenues (0.1%)	The draft rightly highlights the role of Targets 14, 15, and 19 in mobilizing private-sector engagement and aligning financial flows with the KMGBF. We recommend that the report further explore how Target 13, and in particular the Multilateral Mechanism on Digital Sequence Information (DSI), fits within this broader private finance architecture. The Cali Fund is referenced elsewhere in the draft as an “innovative financial mechanism” (see Page 54-55 Box 4.5). We recommend that you deeper dive into its potential as a unique private public partnership under the auspices of the CBD’s Conference of the Parties (COP, see Decision 16/2). While we believe that its operationalization following COP16 still requires significant work, it has the potential to become a novel setting where governments and companies collaborate closely at an international level, directly for the benefit of biodiversity. If this new mechanism is implemented taking account of the needs of both public and private entities (and we are happy to discuss further), we think it could become a unique mechanism to support resource mobilization objectives under Goal D and Target 19, including through design choices that encourage linkages to IPLCs as custodians of biodiversity, private sector financial flows that are predictable and long-term for governments to rely on, and critically – with a demonstrable impact for biodiversity.

or profits (1%)], launched at the resumed sessions of COP16 of the CBD. The Cali Fund encompasses informal processes and discussions with private sector actors related to the DSI decision, to develop a strategy to engage private sector organisations to invest in and become part of the Fund. “	
“Without appropriate policies and regulations, biodiversity’s benefits continue to be treated as free and inexhaustible, resulting in negative externalities where the costs of their loss are not borne by those causing it.” Page 6	While it is correct that biodiversity’s benefits are often undervalued and treated as externalities, it is equally important to consider that penalty based approaches alone will not generate the scale of support needed for biodiversity conservation and restoration. Evidence across the OECD, FAO and WEF shows that punitive instruments—when not paired with viable alternatives—tend to increase production costs, reduce farmer margins, and create resistance among value chain actors, particularly when consumers are unwilling or unable to absorb higher prices. 1. Incentives and value creation must complement regulatory action. Most consumers are not prepared to pay a premium for biodiversity friendly products, and companies alone cannot carry the full economic burden of transitioning supply chains. For this reason, international organizations increasingly emphasize positive incentives, blended finance, public private partnerships, and market creation mechanisms as more effective pathways to mobilize action. Incentives such as payments for ecosystem services, outcome based subsidies, tax credits, or transition funds can reduce risk and accelerate adoption. 2. Biodiversity-positive transition must be economically viable for farmers and companies. Farmers—especially smallholders—are critical stewards of biodiversity but operate under thin margins and high climate risk. Sustainable practices can generate longterm benefits, yet they often require upfront costs, new equipment, or changes in agronomy. Creating climateresilient business models that integrate biodiversity into core operations (not as a cost addon) is essential. This includes supporting innovations such as precision agriculture, diversified cropping systems, natural habitat restoration within farms, and new revenue streams tied to ecosystem outcomes. 3. A nature positive food system requires shared value across the entire chain. For biodiversity investments to scale, benefits must accrue

	not only to the environment but to actors across the system—from producers to processors to retailers. Approaches that link biodiversity outcomes to productivity gains, efficiency improvements, market access, or resilience benefits tend to be more durable. They also encourage companies to integrate nature considerations into their sourcing strategies, risk management frameworks, and longterm planning. 4. Policies should enable transformation, not only restrict harmful practices. Regulation plays a role in setting baselines, but policy frameworks that enable investment, innovation and risk sharing create the conditions for nature positive transitions. This includes: • frameworks for ecosystem service markets, • enabling data and measurement systems, • harmonized biodiversity standards, and • collaboration mechanisms across sectors. Taken together, a more balanced approach recognizes that biodiversity protection cannot rely solely on penalties, especially in a global food system under pressure to feed a growing population. Sustainable progress will come from incentives, innovation, and value creation that make biodiversity conservation a viable and attractive part of climate resilient business models.
“it is essential to align economic incentives and investment frameworks with the value of biodiversity, correcting market failures and lowering barriers so that private actors can invest in ways that sustain natural capital and deliver tangible economic and societal benefits. Constraints in terms of resources, capacities and awareness as well as political challenges impose significant bottlenecks to achieving this. “ Page 7	Economic incentives are also valuable from a policy perspective. While we fully agree on the need to address environmentally harmful subsidies, it is important to recognize that in agriculture the transition cannot place the entire burden on farmers or the food value chain—especially when consumers are generally not willing to pay higher prices for products that internalize the cost of biodiversity investments. This creates a structural financing gap that market actors alone cannot solve. For this reason, a more balanced approach is required: one that combines private sector action—already investing significantly in climate resilient technologies and nature positive innovations—with public incentives that support farmers in adopting regenerative and biodiversity enhancing practices. Such incentives may include transition payments, outcome-based schemes, or risk-sharing mechanisms that reduce the upfront costs associated with new practices.

	Importantly, farmers must also have access to technologies that enable biodiversity protection, including precision agriculture, digital farming tools, biotechnology, and new genomic techniques (NGTs). These innovations can reduce input use, improve soil health, enhance ecosystem resilience, and increase productivity on existing land—directly contributing to both biodiversity outcomes and economic viability. Ultimately, securing farmer income is essential to the long term success of biodiversity positive agriculture. When farmers receive adequate compensation for delivering environmental benefits—such as soil health improvements, habitat restoration, or increased landscape diversity, these practices become both economically viable and socially sustainable. A policy framework that balances regulation with incentives, improves access to innovation, and aligns value creation across the entire food system will be critical for scaling biodiversity conservation and restoration efforts.
i Promoting private sector engagement: Even where enabling environments exist, private actors often face practical barriers to integrating biodiversity considerations into business models, operations and investment decisions. Development actors can engage directly with private actors - both in donor and from partner countries – or indirectly through financial intermediaries and multi-stakeholder platforms to scale up private action for biodiversity. Such engagement focuses on overcoming awareness, technical and capacity gaps; supporting changes in business practices; and enabling firms to respond to regulatory, market and consumer demand for biodiversity-positive outcomes. This includes strengthening local capacities, enabling responsible and traceable supply chains and trade, fostering market development, and promoting responsible business conduct. Page 8	This is a very important and timely proposal. In practice, economic support for biodiversity is rarely directed toward private sector investments, even though companies are central to implementing scalable solutions across global value chains. Existing financing procedures—particularly those involving development finance institutions—often require the participation of multiple intermediary organizations. While these intermediaries play important roles, they also receive part of the available funding, leaving limited resources for companies to implement tangible, high impact interventions on the ground. To accelerate meaningful change, it is critical that resources are also allocated directly to private sector projects that demonstrate high impact potential, strong technical feasibility, and clear scalability pathways. Business model transformation toward biodiversity positive outcomes typically requires substantial upfront investments—whether in advanced technologies, supply chain traceability systems, regenerative agriculture partnerships, or landscape level restoration. These investments are essential, but they are also expensive and often involve long payback periods, which makes it difficult for companies to internalize all associated costs without adequate support. Strengthening private sector engagement therefore requires financing mechanisms that:

	• Directly support on farm and supply chain transitions led by companies; • Reduce risk and unlock capital for biodiversity positive models; • Reward measurable outcomes rather than administrative compliance; and • Enable firms to scale innovations that deliver both environmental and economic benefits and invest in projects that ensures scalability. Our call is to ensure channeling resources to initiatives with proven impact and clear scalability, so that private sector participation becomes a powerful driver of biodiversity conservation and restoration—rather than an underfunded afterthought. This approach aligns public goals with business capabilities, ensuring that biodiversity becomes an integral, actionable, and investable component of climate resilient value chains.
Conversely, adverse legal and regulatory conditions can reinforce biodiversity loss and deter private action. Lengthy business registration procedures, weak protection of intellectual property rights, complex and changing taxation rules, heavy procedures to obtain proof of origin, and divergent administrative, technical or environmental standards all raise costs and uncertainty (ecdpm, 2015[34]). When combined with unclear or inconsistent biodiversity-rules, such barriers disproportionately affect innovative and small-scale actors (see Chapter 3) and discourage financial innovation (see Chapter 4), thereby limiting partnerships and the use of blended finance and other mechanisms needed to scale biodiversity finance. Page10	In addition to regulatory and administrative barriers, it is also important to recognize that the current landscape of voluntary and compliance based biodiversity standards presents significant complexity for private actors. Companies must navigate a rapidly expanding set of non harmonized methodologies, metrics, and reporting frameworks, many of which are essential for complying with international ESG and sustainability disclosure requirements. However, the lack of alignment across standards—ranging from biodiversity impact assessments to nature related risk metrics—creates high transaction costs, uncertainty, and duplication of efforts. This fragmentation is especially challenging for innovative and small scale actors who have limited resources to interpret and operationalize multiple frameworks. Greater harmonization, interoperability, and clarity across voluntary and regulatory standards would significantly reduce this burden and enable companies to more effectively contribute to biodiversity positive outcomes while meeting global reporting expectations. In this context, it is also important to note that, as OECD advances work on harmonizing ESG, Carbon and biodiversity related standards and methodologies(carbon, land metrics, water, etc), existing tools, methodologists, metrics, standards and frameworks or certifications, that have already proven effective in voluntary markets—particularly in the agricultural sector—should be carefully considered. Several methodologies used in voluntary

	biodiversity and ecosystem service markets have undergone extensive field testing, demonstrating practicality, cost-efficiency, and measurable outcomes. Incorporating these tested approaches into future harmonization efforts will help ensure that standard setting does not unintentionally add another layer of compliance, which would further increase costs and administrative burden for companies and farmers. Instead, building on what already works can accelerate adoption, support interoperability, and reduce the risk of creating parallel systems that undermine the objective of simplification.
on this statement: "Policy and regulatory frameworks establish the “rules of the game” for private investment and market behaviour." page 12	While policy and regulatory frameworks are indeed important, it is not entirely accurate to assume they alone “set the rules of the game.” In practice, the operating rules for private investment are shaped by a broader ecosystem of drivers, including investor expectations, corporate risk mitigation strategies, upstream and downstream integration of environmental requirements, and evolving ESG disclosure standards. In the case of agriculture, business models must also incorporate long term dependencies on soil health, water availability, biodiversity, and regenerative practices, which create natural economic incentives independent of regulation. Markets themselves—through consumer behavior, supply chain requirements, technological innovation, and financial sector demands—often define the pace and direction of change. Therefore, policy and regulatory frameworks should function less as the origin of action and more as supportive mechanisms that reinforce, enable, and scale transitions already emerging within markets and value chains, rather than becoming the primary source of obligations that risk adding complexity without driving real impact.
“Robust IP regimes are also essential to ensure the fair and equitable sharing of benefits from the use of genetic resources and associated traditional knowledge, in line with the Convention on Biological Diversity’s (CBD) Nagoya Protocol and target 13 of the KMGBF, which calls for effective legal, policy, administrative and capacity development measures to secure benefit-sharing.” Page 13	We agree that robust intellectual property regimes play an important enabling role in innovation and can support fair and equitable benefit-sharing objectives under the CBD and KMGBF Target 13. Nevertheless, we recommend deleting this paragraph for the reasons set out below. During negotiations leading to the Nagoya Protocol, it was agreed that rules on fair and equitable sharing of benefits from the use of genetic resources should not be enforced through IP disclosures. The report appears to endorse a revisiting of this consensus, which is a concern. From a private-sector perspective it is

	important that IP systems remain distinct from ABS frameworks, rather than IP functioning as an enforcement mechanism. In practice, ABS laws are extraordinarily burdensome and costly to comply with, which is why businesses welcome the multilateral approach of the MLM on benefit-sharing from DSI (see our comments above). Re-aligning IP regimes to enforce ABS (as some countries are doing, e.g. India), carry a real risk of steering biodiversity-related research away from resources that raise significant limitations on IP.
“Development actors can help build administrative systems for access and benefit-sharing (ABS), support compliance with domestic ABS requirements and strengthen the capacity of Indigenous peoples and local communities to negotiate equitable agreements (CBD, 2011[51]) (CBD, 2022[6]). [Example to be inserted].” Page 13	We agree that development actors play an important role in strengthening ABS implementation and supporting the capacity of IPLCs to participate in benefit-sharing arrangements. At the same time, the framing in this section primarily reflects a bilateral, domestic implementation model of ABS under the Nagoya Protocol which was agreed in 2010, drawing on sources that pre-date recent policy developments under the CBD at COP15 and COP16. In light of COP Decision 15/9 which established a multilateral solution for benefit-sharing; and the subsequent Decision 16/2 to operationalize it, CBD Parties have explicitly recognized the structural limitations of purely bilateral ABS approaches (see paragraph 6 of Decision 15/9), coupled with the need to advance a truly multilateral solution (see paragraph 16 of Decision 15/9) which was then operationalized in Cali (see Decision 16/2). We therefore recommend complementing this section with a reference to the Multilateral Mechanism (where two observer seats are also held by private sector representatives, alongside civil society and academia) as an example illustrating how a whole-of-society approach at global level can support a mechanism for biodiversity finance that will significantly reduce transaction costs (which, under the existing ABS approach are prohibitive), enhance legal certainty, and enable more equitable and scalable benefit-sharing, including for IPLCs. Updating the examples to reflect post-COP15 developments will strengthen the relevance of this

	section and better align it with the current direction of international biodiversity policy.
Positive incentives page 18 and 19	This section is very strong, and it is encouraging to see the OECD explicitly recognizing the value of Payments for Ecosystem Services (PES) and the importance of reinforcing positive incentives for biodiversity. There is still considerable work ahead to make PES truly scalable and to ensure that economic benefits flow to projects delivering the greatest environmental impact. Given its direct interface with land, water, soil health, and biodiversity, agriculture should be a major beneficiary of well designed PES schemes, enabling farmers and land managers to be fairly compensated for the ecosystem services they provide while accelerating nature- positive- transformation at scale. It will be great to see more work done in this area and explore challenges and opportunities with the private sector.
Page 20: Transparency and reliable data on ecosystem conditions, pressures and outcomes support evidence-based policymaking, strengthen investor confidence, and provide an additional rationale for nature market participation, motivating companies to act (Conservation International, 2024[43]).	Companies are acting and doing a lot albeit the lack of incentives and policies. Across the document, I have noticed a recurring statement that appears to reflect a certain bias. It is surprising because the private sector invests significantly in biodiversity, yet this contribution seems underestimated or overlooked — even in the country examples, where only government-driven projects are highlighted. A more balanced reflection of the role and scale of private-sector biodiversity investments would strengthen the analysis and provide a more accurate picture of the actors contributing to nature-positive outcomes.
In turn, as capital allocators, financial institutions and other financial-sector actors influence nature outcomes through their lending, investment, and insurance practices. By choosing, which real-economy projects and companies to fund, they can exacerbate environmental degradation or help steer business practices towards more sustainable pathways. Page 22	Loans, investments and insurance on nature assets and biodiversity are currently very limited in the market and not custom made for each sector need. The expectation that companies can fund projects is unrealistic. Funding has to be address by an ecosystem of partners aligned with each project and need, and it has to reflect a way of de-risking operations or building value for each partner.
Engagement is often limited to corporate social responsibility programs, with limited implementation driven by business rationale (Watkins et	This characterization does not fully reflect current private-sector practice. Biodiversity and broader environmental topics are no longer confined to corporate

al., 2019[107]). In turn, the low participation by the private sector in national biodiversity development planning and collaborative efforts, highlights a gap in private sector engagement in biodiversity conservation initiatives which may hinder the mobilisation of resources, expertise and innovation needed from the private sector to address biodiversity challenges effectively (NBSAP Accelerator Partnership, 2024[40]).	social responsibility programs; on the contrary, they are increasingly embedded within core business responsibility strategies and, in many companies, directly integrated into commercial strategies, risk management, supply-chain sourcing, and long-term value creation models. Presenting the private sector's role solely through the lens of CSR underestimates the depth of ongoing investments and the strategic importance that biodiversity already holds for many businesses.
Development actors can strengthen private engagement for biodiversity in different complementary modalities, including... (page 24)	Here are additional examples to consider that can support <u>public</u> and private engagement such as the following: 1. Investing in Climate-Smart and Biodiversity-Enhancing Technologies such as precision agriculture, digital farming platforms, biotechnology, and NGTs to reduce input use, increase land efficiency, and improve soil and ecosystem health. 2. Private investment in drought-tolerant and pest-resistant seeds, which protect yields while reducing environmental pressure. 3. Support farmers to transition to regenerative agriculture: co-funding farmers to adopt regenerative agriculture, soil carbon practices, or water-efficient systems. 4. Blended-finance partnerships where private companies, financial institution and public funds participate in transition funds or shared-risk financing models to support biodiversity restoration. 5. Contributions to Voluntary Biodiversity and Carbon Markets for the development and purchase of biodiversity credits, soil carbon credits, and ecosystem restoration credits to finance landscape-level conservation. 6. Participation in Payments for Ecosystem Services (PES) programs where public funds, financial institutions and companies directly compensate farmers for delivering environmental outcomes. This is a challenging topic as the market is still very immature. 7. Investment for implementation of satellite monitoring, digital traceability, and farm-level data systems to ensure

	biodiversity-positive sourcing and monitor environmental impacts. 8. Adoption of TNFD-aligned risk assessments, biodiversity impact measurement tools, and natural capital valuation to redirect investments toward nature-positive assets.
Traceability, page 30	In terms of traceability it is also important to recognize that stewardship and regulatory compliance for crop protection products represent significant private-sector investments that directly contribute to biodiversity protection. Finished crop protection products, seeds, and biocides are subject to some of the most stringent regulatory frameworks in the world, requiring detailed approval and authorization procedures before they can be placed on the market. Companies adhering to international responsible-use guidelines only commercialize products after they have been rigorously evaluated and approved by competent authorities, ensuring efficacy and demonstrating safety for human health and the environment—including non-target organisms and biodiversity-relevant endpoints. Moreover, these safeguards extend beyond finished products. Chemical substances used in production are heavily regulated under regional chemical legislation such as the EU’s REACH, the United States’ Lautenberg Chemical Safety Act (TSCA), and China’s MEP Order No. 7, among others. These frameworks require extensive testing, environmental risk assessments, and transparency throughout the supply chain. The application of the Globally Harmonized System (GHS) for classification and labeling further supports responsible handling and risk communication, enabling users to apply the products safely and protect surrounding ecosystems. Together, these regulatory provisions and stewardship programs reflect a substantial, ongoing investment by the agricultural technology and crop protection industry to ensure that products are used responsibly, risks are minimized, and biodiversity is protected. Recognizing these efforts is essential when assessing the private sector’s contribution to nature-positive outcomes.

Mobilising private finance for biodiversity through sustainability-linked bonds and impact-linked financing approaches. Page 43	While mobilizing private finance through sustainability-linked bonds and impact-linked financing is an important long-term objective, it is essential to acknowledge that private finance is currently struggling with the immaturity of carbon and biodiversity credit markets. Offtakers are still defining how to de-risk transactions, evaluate the credibility of outcomes, and determine the commercial value of committing to credit purchases. Given the high uncertainty around methodologies, verification systems, and long-term revenue streams, many companies remain cautious. For this reason, sustainability-linked or impact-linked instruments may have strong potential, but their effectiveness will likely materialize over the long term—once market rules, demand signals, and risk-management mechanisms for environmental credits become more mature and predictable. Expectation of funding bonds by means of private sector should consider already those risks.
“Robust IP regimes are also essential to ensure the fair and equitable sharing of benefits from the use of genetic resources and associated traditional knowledge, in line with the Convention on Biological Diversity’s (CBD) Nagoya Protocol and target 13 of the KMGBF, which calls for effective legal, policy, administrative and capacity development measures to secure benefit-sharing.” Page 13	We agree that robust intellectual property regimes play an important enabling role in innovation and can support fair and equitable benefit-sharing objectives under the CBD and KMGBF Target 13. Nevertheless, we recommend deleting this paragraph for the reasons set out below. During negotiations leading to the Nagoya Protocol, it was agreed that rules on fair and equitable sharing of benefits from the use of genetic resources should not be enforced through IP disclosures. The report appears to endorse a revisiting of this consensus, which is a concern. From a private-sector perspective it is important that IP systems remain distinct from ABS frameworks, rather than IP functioning as an enforcement mechanism. In practice, ABS laws are extraordinarily burdensome and costly to comply with, which is why businesses welcome the multilateral approach of the MLM on benefit-sharing from DSI (see our comments above). Re-aligning IP regimes to enforce

	ABS (as some countries are doing, e.g. India), carry a real risk of steering biodiversity-related research away from resources that raise significant limitations on IP.
“Development actors can help build administrative systems for access and benefit-sharing (ABS), support compliance with domestic ABS requirements and strengthen the capacity of Indigenous peoples and local communities to negotiate equitable agreements (CBD, 2011[51]) (CBD, 2022[6]). [Example to be inserted].” Page 13	We agree that development actors play an important role in strengthening ABS implementation and supporting the capacity of IPLCs to participate in benefit-sharing arrangements. At the same time, the framing in this section primarily reflects a bilateral, domestic implementation model of ABS under the Nagoya Protocol which was agreed in 2010, drawing on sources that pre-date recent policy developments under the CBD at COP15 and COP16. In light of COP Decision 15/9 which established a multilateral solution for benefit-sharing; and the subsequent Decision 16/2 to operationalize it, CBD Parties have explicitly recognized the structural limitations of purely bilateral ABS approaches (see paragraph 6 of Decision 15/9), coupled with the need to advance a truly multilateral solution (see paragraph 16 of Decision 15/9) which was then operationalized in Cali (see Decision 16/2). We therefore recommend complementing this section with a reference to the Multilateral Mechanism (where two observer seats are also held by private sector representatives, alongside civil society and academia) as an example illustrating how a whole-of-society approach at global level can support a mechanism for biodiversity finance that will significantly reduce transaction costs (which, under the existing ABS approach are prohibitive), enhance legal certainty, and enable more equitable and scalable benefit-sharing, including for IPLCs. Updating the examples to reflect post-COP15 developments will strengthen the relevance of this section and better align it with the current direction of international biodiversity policy.
National Biodiversity Strategies and Action Plans (NBSAPs) are intended to be the main instrument through which countries translate global biodiversity commitments under the Convention on Biological Diversity (CBD) into	You rightly identify that in practice NBSAPs and biodiversity finance plans often struggle to translate into clear investment signals or operational frameworks for companies.

national objectives, priorities and actions. NBSAPs are national roadmaps that can provide guidance and set out responsibilities across government; and they can complement existing environmental regulations by aligning them with strategic national biodiversity priorities. As such, NBSAPs have the potential to provide a strategic and long-term policy signal to private actors by clarifying national biodiversity priorities, policy direction and the government's commitment to nature. Complementing NBSAPs, biodiversity finance plans (BFPs) aim to identify financing needs, prioritise finance solutions and outline pathways to close the biodiversity funding gap, in line with KMGBF Target 19. In practice, however, this signalling function is weak. NBSAPs and BFPs are often not well aligned across ministries and rarely cascade into private sector investment mandates, market frameworks (WEF, 2025[45]) or enforceable laws that shape private decision-making. Political resistance or limited political will can further obstruct progress (OECD, 2013[38]), while insufficient engagement of finance, planning, economic and infrastructure ministries reinforces siloed environmental policymaking (NBSAP Accelerator Partnership, 2024[40]) (WEF, 2025[45]). Page 17	Currently, the Steering Committee to the Cali Fund created at COP16 is discussing how the NBSAPs could be used to guide funds collected through the new Multilateral Mechanism (MLM) on benefit-sharing from DSI created by Decision 15/9. We believe it is important that the report call on strengthening the NBSAPs, e.g. by making them more oriented on concrete metrics and measurable deliverables, so that the MLM can use them as a North Star for allocating and demonstrating impact of allocated monies collected from the private sector and disbursed through the MLM.
“Positive incentives for biodiversity aim to incentivise actions that conserve, restore or sustainably use biodiversity. These incentives include a range of economic instruments such as payments for ecosystem services (PES), tradeable permits, biodiversity offsets and emerging (voluntary) credits, as well as environmentally motivated subsidies, taxes and charges – including on pesticides, fertilisers, natural resources extraction, wastewater discharges and entrance fees to natural parks - that integrate environmental costs and	We agree that positive incentives (e.g., payments for ecosystem services, tradable instruments, and emerging voluntary biodiversity credits) as essential tools for integrating biodiversity considerations into economic decision-making. We suggest that the Report recommend to policy makers that the positive incentives be integrated into the new Multilateral Mechanism (MLM) created by Decision 15/9 and operationalized by Decision 16/2. In our view, the MLM should not merely function as a bank account collecting funds, but expressly allow for private contributions to be leveraged into biodiversity-positive

benefits into economic decision-making (OECD, 2025[79]).” Page 18	investments and, where appropriate, to generate financial or risk-mitigation returns.
“While 85% of the world’s largest companies are highly dependent on nature for their direct operations, only 2% have the necessary biodiversity expertise on their boards operations. [...]Engagement is often limited to corporate social responsibility programs, with limited implementation driven by business rationale (Watkins et al., 2019[107]). In turn, the low participation by the private sector in national biodiversity development planning and collaborative efforts, highlights a gap in private sector engagement in biodiversity conservation initiatives which may hinder the mobilisation of resources, expertise and innovation needed from the private sector to address biodiversity challenges effectively (NBSAP Accelerator Partnership, 2024[40]).” Page. 23 “Development actors can strengthen private engagement for biodiversity in different complementary modalities, including: [...]Participation in collaborative platforms for biodiversity such as multi-donor trust funds and public-private partnerships (OECD, 2024[114]).” Page. 24	We think you identify a critical gap and welcome your recommendation regarding public-private partnerships. We propose to strengthen it as follows. In our business-to-business interactions, we also experience that limited biodiversity expertise at board and operational levels constrains meaningful participation and collaboration. For that reason, we think the report should call on policy makers (at COP17) to expressly adopt a Decision confirming the need for novel public-private partnerships and collaborative structures at international level that will permit the pooling of biodiversity expertise in both country and private sectors. For example, the Steering Committee to the Multilateral Mechanism (MLM) operationalized by COP Decision 16/2 currently only has 2 business representatives, and only as observers. By contrast, for example, IPLCs have 7 full members. We consider that the private sector should be embraced as a full and equal partner in implementing global biodiversity policy mechanisms, including the MLM. In that way, large companies will be incentivized to build up the requisite expertise internally, and a true whole-of-society approach will ensure greater interaction between the public and private sectors (as well as academia, NGOs and IPLCs) to strengthen implementation of the CBD.
“Conversely, for firms operating across borders, different environmental standards and regulatory requirements across destination markets – such as different (eco)labelling, certification or traceability requirements – can create significant compliance costs and uncertainty (FAO, 2022[64]).” Page. 25	We recommend that you expressly call out the differences between the 100+ access and benefit-sharing laws implemented under the Nagoya Protocol to the Biodiversity convention. This creates a significant compliance cost and uncertainty. The report could acknowledge that the Multilateral Mechanism created by Decision 15/9 may resolve this compliance cost and uncertainty by recognizing the benefit of a one-stop-shop global governance approach, as opposed to a nationally fragmented approach.

“At a multilateral level, they can elevate biodiversity on global agendas through engagement in CBD, UNFCCC, or related international fora. For instance, donors are helping to structure the Cali Fund for the Fair and Equitable Sharing of Benefits from the use of Digital Sequence Information on Genetic Resources (DSI) – the Cali Fund – aiming to mobilise finance from the private sector entities making commercial use of DSI (CBD, 2025[262]) [an innovative financial mechanism to which, each year, users of DSI should contribute a percentage of their revenues (0.1%) or profits (1%)], launched at the resumed sessions of COP16 of the CBD. The Cali Fund encompasses informal processes and discussions with private sector actors related to the DSI decision, to develop a strategy to engage private sector organisations to invest in and become part of the Fund.” Page. 55	Building on earlier observations above, we encourage the OECD to more clearly emphasize the potential of the Cali Fund and the new Multilateral Mechanism (MLM) as exemplary of a much-needed, emerging form of international public–private partnership under the CBD. Across the report, significant gaps in private-sector engagement, capacity, and representation are identified, and we recommend that OECD highlights that mechanisms such as the MLM and the Cali Fund should be viewed as potentially offering the type of collaborative structure needed to pool public-private expertise, reduce transaction costs, and mobilize predictable long-term private financial flows for biodiversity. As companies will be key contributors to e.g. the MLM, it is essential that they are treated as full partners in its governance and strategic design, ensuring that implementation reflects both public priorities and private-sector operational realities. Strengthening these multilateral PPP-type arrangements can help unlock the innovation, financing, and technical capabilities required to make biodiversity outcomes scalable and durable.