

POLICY BRIEFING

PRIORITIES FOR BIODIVERSITY COP16

October 2024

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The six Principles for Responsible Investment are a voluntary and aspirational set of investment principles that offer a menu of possible actions for incorporating ESG issues into investment practice. The Principles were developed by investors, for investors. In implementing them, signatories contribute to developing a more sustainable global financial system. More information is available at www.unpri.org

ABOUT THIS BRIEFING

This briefing represents key policy priorities and recommendations for Parties to the Convention on Biological Diversity (CBD) to operationalise the Kunming-Montreal Global Biodiversity Framework.

This briefing invites discussion with signatories on nature issues from a policy perspective in relation to the 16th Conference of the Parties (COP16) to the CBD, and serves as a resource for signatories for their own policy engagements.

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THE CLIMATE-NATURE NEXUS IN THE ROAD TO COP30

The road to the United Nations Framework Convention on Climate Change (UNFCCC) 30th session of the Conference of the Parties (COP30), to be hosted in Brazil in November 2025, is a critical window of opportunity for both state and non-state actors to raise their ambition in the economic transition to deliver on climate, nature and social objectives. This comes at a time where it is essential to create an enabling policy environment to increase the incentives and ability of investors to monitor and disclose sustainability outcomes, mitigate sustainability risks, and contribute to sustainability goals.¹

COP30 represents a significant milestone, as it will see Parties revise their nationally determined contributions (NDCs) under the ratchet mechanism of the Paris Agreement. With climate change being one of the key drivers of biodiversity loss², and the [outcomes of the first global stocktake](#) clearly highlighting the role of nature for mitigation and adaptation, it is important that the climate-nature interconnections are fully considered during this process to ensure a holistic and coherent policy landscape for climate and nature objectives together.

This briefing focuses on the key actions governments can take on nature and biodiversity loss through the Convention on Biological Diversity (CBD) and maximise the synergies between climate and nature action in the context of the UNFCCC, which is simultaneously and increasingly driving action on nature.

Nature Aspects of the 2024 Global Investor Statement to Governments on the Climate Crisis

Launched on 17 September 2024, the 2024 [statement](#) has already been signed by 534 financial institutions, representing more than US\$29 trillion in assets under management. It will remain open for signatures until 1 November 2024, ahead of COP29, where it will be presented to governments with the final list of signatures.

Statement signatories call for a whole-of-government approach to achieve a climate-resilient, net zero emissions economy by 2050 or sooner. Recognising the importance and relationship to nature, it furthermore calls on governments to address nature, water and biodiversity-related challenges contributing to and stemming from the climate crisis:

- Implement ambitious national biodiversity strategies and action plans that support the targets in their NDCs, per the Kunming-Montreal Global Biodiversity Framework.
- Establish and deliver commitments to address water scarcity and pollution, halt degradation of other natural ecosystems, including halting and reversing deforestation and forest degradation by 2030 in line with the Global Stocktake and the Glasgow Leaders' Declaration on Forests and Land Use.
- Scale up climate finance for nature-based solutions and water solutions.
- Strengthen nature-related disclosures across the financial system by encouraging corporate reporting aligned with the Taskforce on Nature-Related Disclosures recommendations.

¹ PRI, UNEP FI, the Generation Foundation (2024), [A Legal Framework for Impact Summary Report](#)

² IPBES (2019), [Global Assessment Report on Biodiversity and Ecosystem Services](#)

KEY THEMES OF COP16

The 16th meeting of the Conference of the Parties (COP16) to the CBD will take place in Cali, Colombia between October 21 and November 1, 2024. Following the adoption of the [Kunming-Montreal Global Biodiversity Framework](#) (also known as the Biodiversity Plan) at [COP15](#), the focus is on implementation at COP16.

More information on the implications of the Biodiversity Plan for investors, can be found in [Stepping Up on Biodiversity](#), a joint publication from the PRI, United Nations Environment Programme Finance Initiative (UNEP FI) and the Finance for Biodiversity Foundation.

At COP16, Parties will:

- Submit revised national biodiversity strategies and action plans (NBSAPs), aligning with the goals and targets of the Biodiversity Plan. Parties not in a position to submit revised NBSAPs shall at least communicate revised national targets.
- Review and strengthen the overall resource mobilisation strategy to ensure that it provides a solid basis for guiding Parties and other actors towards the mobilisation of resources in line with the ambition of the Biodiversity Plan.
- Consider the findings of the Ad Hoc Technical Expert Group on Indicators and finish developing the Biodiversity Plan's monitoring framework. Parties will also consider the need for further work to fully implement and review the effectiveness of this monitoring framework.
- Discuss operationalising the multilateral mechanism for the fair and equitable sharing of benefits from digital sequence information on genetic resources.

POLICY RECOMMENDATIONS

The following are the key policy recommendations for Parties to the CBD:

- National biodiversity strategies and action plans should provide an enabling environment for investors to contribute to nature objectives.
- National biodiversity strategies and action plans should be delivered in coordination with climate and social objectives, enhancing synergies where possible.
- Parties should establish a resource mobilisation strategy that catalyses private finance for nature, reforms financial flows and incentives justly, and aligns the multilateral financial architecture to sustainability goals.
- Parties should ensure that the monitoring framework indicators are relevant to the finance sector, provide guidance for sectoral transformation, and are interoperable with climate finance.
- Parties should address pollution holistically and should support the development of a robust and ambitious international legally binding instrument on plastic pollution.

Each of these points are elaborated upon in the following sections of the briefing.

NATIONAL BIODIVERSITY STRATEGIES AND ACTION PLANS SHOULD ENABLE INVESTOR ACTION FOR NATURE

Parties should deliver clear and robust NBSAPs with sector-specific targets and pathways, aligning with the ambition of the Biodiversity Plan. NBSAPs are important for providing mid- to long-term signals to guide the economic transition and responsible investment decisions and should be delivered in such a way that serves this purpose.

In line with the whole-of-government and whole-of-society approach mandated by the Biodiversity Plan³, NBSAPs should acknowledge the integral role of the finance sector in addressing nature issues and should **provide an enabling environment for investors to contribute to nature objectives**. The PRI's [Nature Policy Roadmap](#) discusses policy reforms and instruments that can enable investors to effectively address nature issues. The key elements are:

- The economic transition requires **a whole-of-government approach**. The PRI's [Investing for the Economic Transition](#) paper makes the case for a whole-of-government approach and presents a framework to support governments pursue such a transition. Good governance and sufficient enforcement are also essential to the effectiveness of any policies for nature.
- Governments **should clarify the relevance of nature issues to corporates and investors, and their duties to manage and address nature-related factors**. The [Legal Framework for Impact](#) summary report by the PRI, UNEP FI, and the Generation Foundation finds that the debate is shifting from whether investors should consider sustainability outcomes at all, to asking how investors can play their full role in addressing sustainability challenges. Regulators' clarifications should provide investors and companies with sufficient discretion to incorporate nature-related factors into their decision-making processes as needed and consistent with fiduciary duties and achieving business objectives.
- Regulators should **introduce practicable environmental and human rights due diligence requirements aligned with international standards**. Robust due diligence regimes would require

³ CBD, [Introduction to the GBF](#) webpage

the identification and mitigation of negative outcomes in value chains. Prevention, mitigation and provision of remediation to impacts should be aligned to the mitigation hierarchy.⁴

- As mandated by the Biodiversity Plan, regulators should **introduce mandatory and standardised disclosure regimes for nature** for corporate and financial institutions, taking into account investors' data needs.⁵ Moreover, governments have an important role in generating and maintaining state-of-nature data.
- Regulators should **encourage stewardship⁶ on sustainability issues including for nature**. Regulators should furthermore clarify how investors may engage in collaborative stewardship activities whilst remaining compliant with other market regulations.
- Governments should **support the development of nomenclature instruments for nature**, including sectoral pathways and taxonomies.
- Governments should **take an integrated approach to nature and other sustainability issues in policymaking**, to ensure that synergies are amplified and trade-offs successfully managed. This is elaborated upon in the next section.
- Governments should **adopt coordinated and synergistic financial, corporate and real economy policies for nature**, in line with a whole-of-government approach. Real-economy policies should be pursued in parallel to corporate and financial policies to holistically address nature-related issues. For the issue of forest loss and land degradation, it is important to manage the economic drivers of forest loss through policies in both producer and consumer markets of forest-risk commodities.⁷

NATIONAL BIODIVERSITY STRATEGIES AND ACTION PLANS SHOULD BE DELIVERED IN COORDINATION WITH CLIMATE AND SOCIAL GOALS

The climate and nature crises are interconnected: we cannot reach net zero without halting and reversing biodiversity loss, and we cannot tackle biodiversity loss without addressing climate change. Governments should therefore **develop and implement NBSAPs and NDCs in an integrated and coordinated manner, enhancing synergies where possible**. Key actions in line with a whole-of-government approach include:

- **Deliver on the [Glasgow Leader's Declaration on Forests and Land Use](#) commitments** to halt and reverse forest loss and land degradation by 2030.
- **Align national food systems and agriculture strategies with climate and nature objectives** in a proportionate and equitable way to address forest loss and land degradation, reduce emissions, while ensuring the resilience and long-term health and productivity of food systems.
- **Support the Global Goal on Adaptation by implementing the [Sharm-EI-Sheikh Adaptation Agenda](#)** and scaling up nature-based solutions and ecosystem-based adaptation approaches.
- **Scale up the deployment and utilisation of nature-based solutions to capture climate and nature co-benefits**. For climate mitigation, this means prioritising nature-based carbon sinks over industrial carbon removal techniques. For climate adaptation and increased resilience, it means focusing on ecosystem-based adaptation approaches.

⁴ Cross Sector Biodiversity Initiative (2015), [A Cross-Sector Guide for Implementing the Mitigation Hierarchy](#)

⁵ PRI, [The PRI's Investor Data Needs Framework](#) webpage

⁶ Stewardship, or active ownership, is the use of investor rights and influence to protect and enhance overall long-term value of assets.

⁷ PRI, [Spring](#) webpage

Equally, **the social dimensions of nature-related issues should be considered and safeguarded in the economic transition.** A just nature transition can be defined as one delivering decent work, social inclusion and the eradication of poverty in the shift to a net zero and climate-resilient economy that simultaneously delivers nature goals.⁸ The Biodiversity Plan also recognises the need for a just nature transition. Key actions include:

- **Recognise the rights of Indigenous Peoples and local communities and their contributions to the sustainable management of natural ecosystems⁹,** including obtaining free, prior and informed consent in line with the requirements of United Nations Declaration on the Rights of Indigenous Peoples for projects and activities.
- **Ensure full, equitable and inclusive participation in decision-making and access to justice and information** in the transition. Governments should identify and engage fairly with all stakeholders in issues that may arise.
- To mitigate potential impacts to socio-economic conditions when pursuing nature objectives, governments should **support research, development and commercialisation of new solutions and technologies** that are sustainable and help to fulfil socio-economic needs.¹⁰ The availability of such options could help alleviate possible social impacts.

ESTABLISH A HOLISTIC RESOURCE MOBILISATION STRATEGY

In line with the whole-of-government and whole-of-society approach, the overall resource mobilisation strategy for the Biodiversity Plan and Parties' respective national biodiversity finance plans should:

- **Catalyse private finance for nature objectives.** Public funds could play an important catalytic role through tools such as blended finance and insurance-type mechanisms to scale-up private investments for nature, especially to support developing countries. The recommendations outlined above from the PRI's Nature Policy Roadmap also describe the landscape of policies that could help scale up investor action on nature more generally.
- **Identify and reform financial resource flows, including subsidies, that harm nature and biodiversity,** as per Target 18 of the Biodiversity Plan. It is important, however, to **ensure a just and equitable process in any reforms of incentives.** This may be realised through managing reforms gradually to avoid sudden shocks, safeguarding vulnerable segments of society through redistribution of savings or compensation, and to strengthen social and environmental protection through alternative policies.¹¹
- **Align the multilateral financial architecture with ambitious sustainability goals** to direct capital flows to emerging and developing economies, in line with Goal D and Target 19 of the Biodiversity Plan.

ENSURE RELEVANT AND INTEROPERABLE MONITORING FRAMEWORK INDICATORS

The Biodiversity Plan's monitoring framework is an important tool to support implementation and tracking of progress. A robust monitoring framework would encompass the following elements:

⁸ Muller, S. and Robins, N. (2022), [Just nature: How finance can support a just transition at the interface of action on climate and biodiversity](#)

⁹ IPBES, [Indigenous and local knowledge in IPBES](#) webpage

¹⁰ As an example, while reducing single-use plastics to tackle plastic pollution, it is important to ensure the availability of sustainable alternative materials that could equally fulfil the same societal functions as plastics, as plastics currently play an important role for food protection (supporting the right to food) and in the medical setting (supporting the right to health).

¹¹ Business for Nature (2023), [Recommendations to governments: How to implement Target 18 of the Global Biodiversity Framework](#)

- In line with the Biodiversity Plan's whole-of-society approach, governments should ensure the indicators and associated methodologies of the monitoring framework are **relevant to the finance sector and fully capture the actions and progress by non-state actors**. Indicator D3 under Target 19 is particularly important for private conservation funding and sustainable use of biodiversity and ecosystems. Specifically, governments may consider developing methodologies for accounting for different asset classes that contribute to nature objectives.
- The indicators and associated methodologies can play an important role to **provide guidance and clarity for sectoral transformation to achieve the goals of the Biodiversity Plan** and should be delivered in such a way that supports this function.
- Given the close interconnections between climate and nature issues, **the monitoring framework should enable interoperability with climate finance**, whilst avoiding double counting.

TAKE AMBITIOUS ACTION TO ADDRESS POLLUTION

Target 7 of the Biodiversity Plan emphasises the need to reduce pollution risks and the negative impact of pollution from all sources.¹² Accordingly, **NBSAPs should address pollution holistically and support the shift to a circular economy**.

Furthermore, **governments should support the development of a robust and ambitious international legally binding instrument (ILBI) on plastic pollution** ahead of the fifth session of the intergovernmental negotiating committee on plastic pollution in November 2024,¹³ in line with the need to address economic externalities as part of the economic transition to a sustainable and equitable economy.¹⁴ The [Finance Sector Statement Calling for an End to Plastic Pollution](#), endorsed by 160 financial institutions representing over US\$15.5 trillion combined assets, sets out what a robust agreement would include from the perspective of the financial sector:

- **Set an objective to align financial flows, public and private, with the objectives of the ILBI.** Parties could draw inspiration from the similar objective on aligning financial flows as set in the Paris Agreement, in its article 2.1.c, and in the Biodiversity Plan, in its Goal D.
- **Set harmonised targets and binding obligations across the plastics value chain.** This would enable business and financial institutions to make more informed, policy-driven, lending and investment decisions with regards to the plastics value chain.
- **Enable and ensure companies assess and disclose plastic related risks and opportunities** (e.g., as part of their assessment of nature-related risks). This should be enabled through consistent mandatory disclosure requirements, which build on existing voluntary frameworks (such as the Taskforce on Nature-related Financial Disclosures recommendations), and harmonised sustainable finance taxonomies (to support the mobilisation of financial flows to a circular plastics economy).
- **Promote an enabling policy environment for the transition to a sustainable and equitable economy that addresses plastic pollution**, such as through the provision of well-designed, harmonised extended producer responsibility schemes that help scale collection, sorting and recycling systems.
- **Catalyse further private investment to end plastic pollution** through public-private partnerships, blended finance, and de-risking mechanisms. These mechanisms mitigate investment risks and incentivise private sector involvement in combating plastic pollution.

¹² CBD, [Target 7 Reduce Pollution to Levels That Are Not Harmful to Biodiversity](#) webpage

¹³ UNEP, [Intergovernmental Negotiating Committee on Plastic Pollution](#) webpage

¹⁴ PRI (2023), [Investing for the economic transition: the case for whole-of-government policy reform](#)

- **Identify and optimise the co-benefits and synergies between financial flows addressing plastic pollution, climate action, and biodiversity preservation and restoration** and ensure these links are reflected in policy and regulatory interventions.