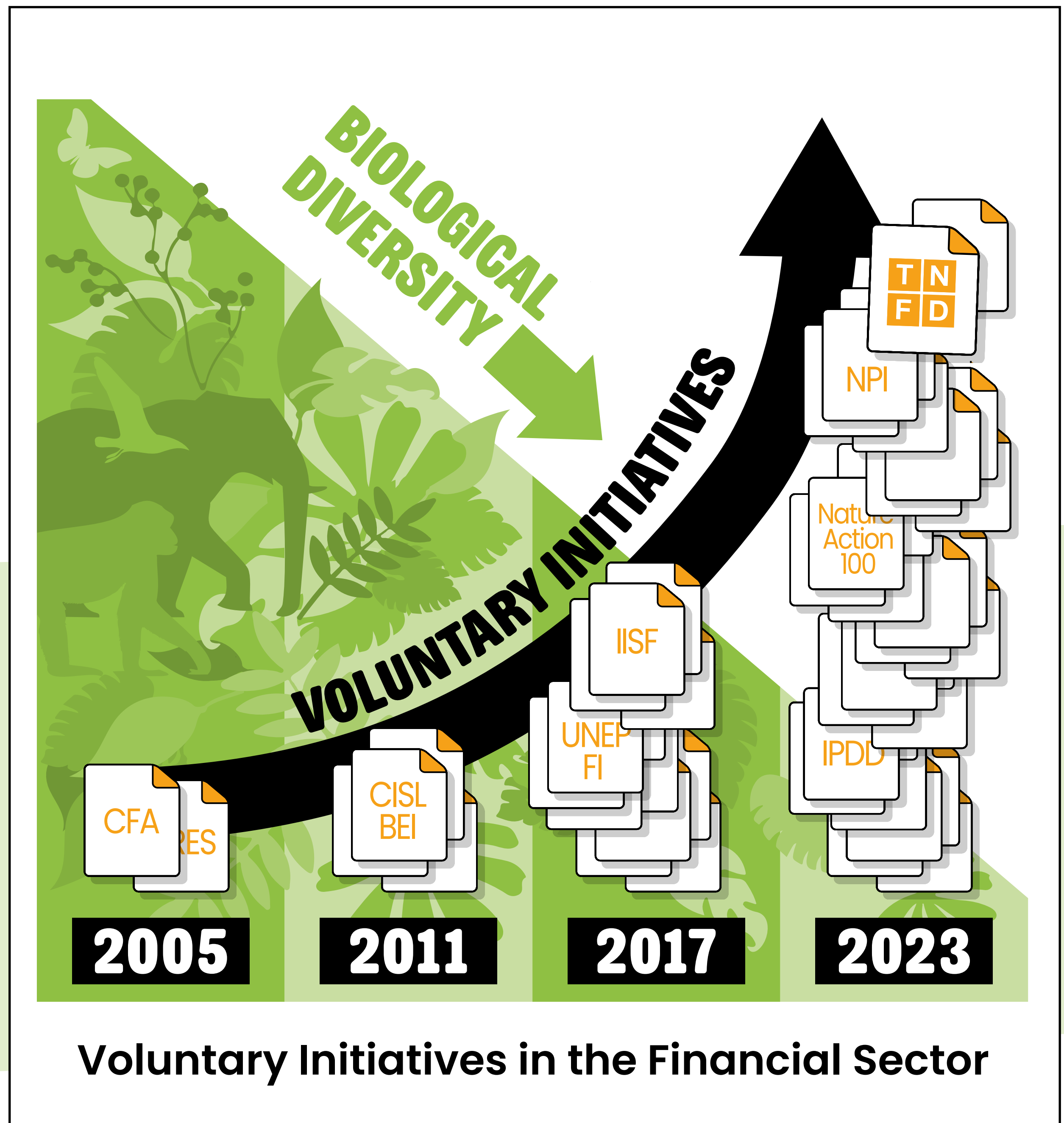
STOP CORPORATE CAPTURE
OF THE CONVENTION ON BIOLOGICAL DIVERSITY

Remove the Taskforce for Nature-Related Financial Disclosures (TNFD) from the Strategy for Resource Mobilization



Voluntary Initiatives in the Financial Sector

MILIEU DEFENSIE
FRIENDS OF THE EARTH NETHERLANDS

STOP CORPORATE CAPTURE OF THE CONVENTION ON BIOLOGICAL DIVERSITY

Remove the Taskforce for Nature-Related Financial Disclosures (TNFD) from the Strategy for Resource Mobilization

KEY MESSAGES

- Over US$395 billion has been directed to 300 companies in tropical forest-risk sectors since the Paris Agreement, with US$77 billion flowing in just the last year and a half (January 2023 - June 2024).

- Voluntary, market-led solutions to environmental problems have long marginalized stronger forms of financial regulation despite the fact that scholars have consistently found that such mechanisms have been largely ineffective in halting environmental destruction.

- The Taskforce on Nature-Related Financial Disclosures (TNFD) is developed by an ultimate decision-making body that includes some of the world's largest deforesters and its opaque consultation processes are inaccessible to grassroots groups, rights holders, and civil society participation. It is therefore not surprising that it is not in line with GBF targets and has critical gaps.

- Disclosures of nature-related financial risk do not lead to a reallocation of capital and distract from more democratic and effective forms of financial regulation. Belief in the false promise of disclosure reflects an overly optimistic and outdated understanding of the financial system that has been discredited since the 2007-2008 financial crisis.

- The TNFD should therefore have no place in CBD's Strategy for Resource Mobilization. If references to the TNFD are not removed from this text, the CBD would provide this illegitimate and ineffective initiative with de facto regulatory power.

- There is no shortage of alternatives to the risk disclosure approach, including proposals to reassert democratic oversight over the provision of capital. Without major financial sector reforms, the Global Biodiversity Framework (GBF) objectives to halt and reverse biodiversity loss before 2030 will not be achieved.

THE PROBLEM

PRIVATE FINANCE IS A KEY DRIVER OF BIODIVERSITY LOSS

Over the past 8 years, 60 of the world's largest banks channelled US$6.9 trillion into the fossil fuel industry, further exacerbating the climate crisis as well as biodiversity loss (Rainforest Action Network 2024a). New analysis from the Forests & Finance coalition reveals that over US$395 billion has been directed to 300 companies in tropical forest-risk sectors since the Paris Agreement, with US$77 billion flowing in just the last year and a half (January 2023 - June 2024). Notably, investments in these sectors have risen 7% since September 2023 (Forests & Finance 2024a).

In addition to directing capital to activities that drive biodiversity loss, the financial sector is also actively involved in opposing environmental regulations. The financial sector was the largest block opposing the creation of the European Union's Taxonomy for Polluting Activities, with financial institutions outnumbering even oil and gas companies in lobbying against the classification system (Schreiber, Pinson, and Ileri 2020). A recent study of 30 of the world's largest financial institutions found that, despite the fact that 29 of these had set zero targets, half were associated with industry groups involved in lobbying against climate policy (InfluenceMap 2022a). Similar lobbying efforts are expected with regards to biodiversity policy (InfluenceMap 2022b). The Dutch Banking Association infamously lobbied against the inclusion of the financial sector in the European anti-deforestation Regulation in 2022 (Kolkman 2023).

THE FALSE SOLUTION

DISCLOSURE WILL NOT DRIVE A GREEN TRANSITION IN FINANCIAL MARKETS

Due to this overwhelming evidence about the role of private finance in driving biodiversity loss, governments committed to "progressively align[] all relevant public and private activities, fiscal and financial flows" with the goals and targets of the Global Biodiversity Framework (GBF target 14), which aims to halt and reverse biodiversity loss by 2030.

While the acknowledgment of the importance of aligning financial flows with the GBF is welcome, the CBD is unfortunately and surprisingly in thrall to an outdated and overly optimistic understanding of the financial system that has been discredited since the 2007-2008 financial crisis (van 't Klooster 2023). Both GBF target 15 which encourages businesses and financial institutions to "disclose their risks, dependencies and impacts on biodiversity" in order to "progressively reduce negative impacts" as well as CBD's *Strategy for Resource Mobilization* suggest that, according to the CBD, such disclosures will enable individual investors to bring about a green transition in financial markets. Yet scholars have long warned against assuming that more information disclosure is the answer to greening finance because, quite simply, lack of information is not the reason that financing flows to harmful activities in the first place (Irvine-Broque and Dempsey 2023; Christophers 2017; Ameli, Kothari, and Grubb 2021). Most worryingly, by explicitly mentioning the Task Force on Nature-related Financial Disclosures (TNFD) in

its *Strategy for Resource Mobilization*, the CBD is placing the future of the GBF not only in the hands of the false promise of disclosure but also in the hands of the widely criticised, market-led disclosure framework of the TNFD.

Voluntary, market-led solutions to environmental problems have long marginalized stronger forms of financial regulation despite the fact that scholars have consistently found that such mechanisms have been largely ineffective in halting environmental destruction (Clapp 2017, 2; Peter 2018; Hennig and Wörsdörfer 2015). To take but a few, recent examples, the Soft Commodities Compact (SCC), which launched in 2014 and committed 12 major European and US banks to support clients in their commodity supply chains reach the goal of "zero net deforestation" by 2020, has itself acknowledged failure, having had "no discernible or measurable positive impact on the level of deforestation" (Banktrack 2020, 38). Similarly, the final monitoring and progress report on the Dutch Banking Sector Agreement (DBA) (2016-2019), which committed 11 Dutch banks to work towards meeting their responsibilities to respect human rights in their project finance and corporate loans, found that it was "difficult … to establish whether and if so how, the DBA has led to real change on the ground for individuals and communities" (Monitoring Committee 2020, 52). The independent report also highlighted that "the adhering banks have used confidentiality arguments to refuse discussing how conclusions from the working groups were implemented in banks' policies and practices" (Monitoring Committee 2020, 53) and that "there are many instances in which … the argument of client confidentiality is invalidly used to prevent transparency and accountability" (Monitoring Committee 2020, 53).

TNFD: BUSINESS AS USUAL

RELYING ON THE WORLD'S BIGGEST DEFORESTERS TO HALT BIODIVERSITY LOSS. WHAT COULD GO WRONG?

Most prominent among these voluntary, market-led initiatives is the Task Force on Nature-Related Financial Disclosure (TNFD). The TNFD was established to "develop and deliver a risk management and disclosure framework for organisations to report and act on evolving nature-related risks" (TNFD 2022). It claims that such disclosures will ultimately "support[] a shift in global financial flows away from nature-negative outcomes and toward nature-positive outcomes" (TNFD 2022). Before turning to questions of its likely effectiveness, it is important to emphasize the obvious – the involvement and, indeed, leading role of private sector actors in formulating this framework involves substantial conflicts of interest (see also Azizzudin 2021; Eaglesham 2022).

The TNFD is being developed by companies and financial actors that are notorious for their role in fuelling deforestation, including Bunge, Rabobank, BlackRock and Nestlé (Forests & Finance 2024a; Trase 2020; cited in Kedward, Gabor, and Ryan-Collins 2022). TNFD adopters include some of the largest bankers of fossil fuels (e.g. Bank of America) as well as notorious companies such as Brazilian miner Vale, whose mine tailings dam collapse killed hundreds of people in 2019 and placed the company on exclusion lists in 9 countries. This clearly shows that companies and financial actors "see TNFD reporting as compatible with the status quo" (Rainforest

Action Network 2024b). The TNFD is also infamously inaccessible to grassroots groups, rights holders, and civil society participation beyond large establishment conversation organizations due to inaccessible communication and requirements for participation that actively discourage critical voices (Forests & Finance 2022). In May 2023, 62 civil society organizations and networks and 3 Goldman Environmental Prize winners wrote an open letter to the TNFD, warning that TNFD's consultation processes remain "shrouded in secrecy" ("Joint Open Letter to the TNFD" 2023), with the TNFD unwilling to disclose – even when requested – the members of its national consultation groups, making it impossible to know if corporations facing serious allegations of crimes are involved.

It is therefore unsurprising that the TNFD (a) recommends that businesses disclose whether they have a grievance mechanism in place but not the actual grievances and complaints they face about their biodiversity and human rights impacts; (b) recommends that businesses should decide on the "level of geographic specificity achieved" (TNFD, 2023, 54) in their disclosures, thus allowing for broad-brush "ecosystem" or "biome" level location reporting which makes it impossible for local communities to know if a company is operating in, sourcing from or financing activities in their local area; and (c) advocates a "flexible" approach to materiality, whereby the reporting entity should follow its jurisdiction's approach to materiality in deciding whether it wants to report on nature-related financial risks only or also on nature-related impacts. Most jurisdictions only require the former type of reporting (i.e. "financial materiality").

For these reasons alone, the CBD should remove its explicit reference to the TNFD. If reference to the TNFD is not removed from CBD's *Strategy for Resource Mobilization*, the CBD would effectively provide a market-led framework written by some of the world's biggest deforesters with de facto regulatory power. Such a stance would be undemocratic and would ultimately delegate the nature and pace of the green transition to private finance and corporations.

THE FLAWED ECONOMIC LOGIC OF THE TNFD

While it is too early to rigorously evaluate the effectiveness of the TNFD, early analyses of its predecessor in the realm of climate, The Task Force on Climate Related Disclosures (TCFD), suggest that the TCFD has yet to shift financial flows for most financial institutions (Hook and Vincent 2020; Ameli, Kothari, and Grubb 2021). The top five banks of fossil fuels since the Paris Climate Agreement all produce TCFD reports (RAN 2024a). We synthesize academic scholarship to show that TNFD's underlying theory of change according to which disclosures of nature-related financial risk will lead to a reallocation of capital is flawed, outdated, and designed to stand in and distract from more democratic and effective forms of financial regulation.

According to long discredited economic orthodoxy, enhanced disclosure of nature risks will improve market pricing of such risks as market actors will increase costs of capital for risky firms in order to protect their future returns. This financial pressure, in turn, will ultimately lead such firms to change their practices in order to secure better financing terms.
This relies on at least three false assumptions.

FALSE ASSUMPTION NO. 1

NATURE-RELATED FINANCIAL RISKS ARE RELIABLY MEASURABLE

For disclosures of nature-related risks to shift financial flows, it must first be possible to reliably quantify nature-related financial risks. Scientists, private actors, and third-party ESG providers have been trying to quantify such risks since at least 2013 with very little success (Dempsey 2013; 2016). Whereas quantifications of climate-related financial risks have seen rapid progress (e.g. Vermeulen et al. 2018), numerous attempts to do the same for biodiversity loss in a variety of jurisdictions have only amounted to "exposure" analyses (van Toor, Piljic, and Schellekens 2020 in The Netherlands; Svartzman et al. 2021 in France; World Bank and Bank Negara Malaysia (BNM) 2022 in Malaysia; Calice, Diaz Kalan, and Miguel 2021 in Brazil; Martínez-Jaramillo and Montanez-Enriquez 2021 in Mexico) – i.e. only assessing the exposure of the financial sector to biodiversity loss but not quantifying potential financial losses from such exposures.

There are several factors that frustrate the quantification of nature-related financial risks. Broadly speaking, quantifications of nature-related financial risks rely on a three-step process: (a) forward-looking scenarios that project policy and physical pathways (i.e. expected nature regulations as well as projections of future biodiversity loss and loss of ecosystem services); (b) nature-to-economy modelling to project the economic impacts of such scenarios; and, finally, (c) financial modelling to then translate these economic impacts (e.g. change in GDP, unemployment rate) into traditional financial risk categories such as market, operational, credit risk etc. Each of these three steps is fraught with difficulties.

First, regarding (a), relevant scenarios have not yet been developed due to the difficulty in capturing biodiversity through a single metric (O'Gorman 2021); the geographical heterogeneity and multidimensionality of biodiversity which renders global scenarios less relevant and instead requires a multiplicity of more granular scenarios (NGFS 2023); lack of clarity on future nature policies (Almeida, Senni, and Dunz 2023) as well as inability to anticipate what other market participants will do in response to such policies (Christophers 2019, 768; see also Krahé 2021).

Secondly, regarding (b), current modelling tools severely constrain the reliable translation of such scenarios into economic impacts. That is because the vast majority of economic models assume that biodiversity loss – or, in economic terms, "declining stocks of natural capital" - can be offset by an increase in manufactured or human capital. In other words, they do not account for the limited or non-substitutability of biodiversity and "ecosystem services" (Svartzman et al., 2021, section 3; Almeida et al., 2023; NGFS, 2023). In addition, most economic models used in such analyses assume that the economy will be able to quickly return to equilibrium in response to any shock (Prodani et al. 2023, 7). These modelling constrains have led to overly optimistic projections of the economic impacts of nature loss that are widely acknowledged as unrealistic (e.g. Johnson et al. 2021, xi).

Lastly, regarding (c), such economic impacts would need to be translated into projections of financial losses. The first attempts to quantify such financial risks have highlighted major methodological limitations (Prodani et al. 2023; Ranger and Oliver 2024). Key difficulties include the fact that stress testing models often do not have the sectoral granularity that characterizes the economic impacts of biodiversity loss (Prodani et al. 2023, 67) as well as the difficulties involved in assigning probabilities to future policy and physical scenarios due to the non-linear processes that govern the biosphere (Kedward, Ryan-Collins, and Chenet 2022).

FALSE ASSUMPTION NO. 2

PRIVATE ACTORS WILL ACT ON RISK DISCLOSURES

Despite these gasping difficulties, investing resources in the "herculean evolution in metrics and risk modelling required to fulfil the risk-based regime currently in place" (Kedward, Gabor, and Ryan-Collins 2022, 24) would be justified if evidence would suggest that risk disclosures would indeed be used by financial actors in their investment decisions in ways that shift financial flows away from nature-harming activities. However, scholars have found that such disclosures are rarely factored into investment decisions. In 2020, the European Central Bank (ECB) (2020, 14) reported that the EU's biggest banks "do not have the tools to assess the impact of climate-related and environmental risks on their balance sheet" and that "only a small number of institutions have fully incorporated climate-related and environmental risks into their risk management framework." There are many reasons for this, including, as discussed above, the unreliability of such quantifications; the continued profitability of dirty assets; the myriad, often U.S. based, investors who do not believe in climate change and biodiversity loss; the incompatibility between investors' short time horizons (2-3 years) and the longer time frames in which the most dire effects of climate change and biodiversity loss are expected to be experienced; and, lastly, the rise of asset managers as key financial intermediaries with no interest in climate- or nature-related financial risks.

The Financial Times reports that investors have shown muted interest in climate disclosures - "an HSBC survey of 2,000 investors found that just 10 per cent viewed the disclosures as a relevant source of information" (Hook and Vincent 2020). Scholars agree, reporting that only the introduction of "harder" policy measures has proven to push investors to integrate climate concerns into investment decisions, with "soft" measures such as information disclosure having had only have a marginal influence (Pfeifer and Sullivan 2008). The short-term investment horizons to which investors are wedded are a central reason behind the inefficacy of disclosure. Investors themselves report that "the average company in the world has an expected life of years … so the average company will be gone by the time we begin to see the serious physical effects of climate change" (Christophers 2019, 767). When asked about how climate concerns are factored into investment strategies, one investor stated that "Frankly the short answer is that investors are so worried about career risk that they don't look past the end of the next few months as a rule" (Christophers 2019, 766).

The rise and growth of asset managers vis a vis more traditional actors such as banks provides a final clue as to why environmental disclosures do not seem to influence investment decisions. Unlike asset owners such as banks, pension funds, and sovereign wealth funds, asset managers are "economically disinterested intermediaries" (Braun 2020, 25) – while they may be owners of assets in the legal sense, they are not owners in the economic sense. Since any gains or losses made are simply passed onto those whose assets are being managed, asset managers effectively "lack skin in the corporate game" (Braun 2020, 25), rendering them largely disinterested in integrating climate- or nature-related financial risks into their decision making.

FALSE ASSUMPTION NO. 3

ACTING ON RISK DISCLOSURES WILL DIVERT CAPITAL AWAY FROM NATURE-HARMING ACTIVITIES

In the few cases in which financial actors have integrated climate- and nature-related risks into their investment decisions, the consequences have, so far, proven perverse. For example, an environmental risk assessment might instruct a private insurance company to stop insuring or raise the cost of insurance for businesses and households operating in a region that is prone to physical hazards. While this makes sense for the private insurance, it leads to devastating consequences for the inhabitants of the region (Bolton et al. 2020; Dafermos et al. 2022). Similarly, since the Global South is home to most of global biodiversity, integrating biodiversity risk disclosures into debt sustainability assessments of sovereign debt would lead to low credit ratings mainly for emerging and developing countries (Agarwala et al. 2024), increasing these countries' borrowing costs and further constraining the abilities of such governments to invest in mitigation, adaptation, and social spending (Dempsey et al. 2022; Dibley, Wetzer, and Hepburn 2021).

Another crucial development that explains the perverse consequences that result from the seldom integration of environmental risk disclosures into investment decisions is the rise of the so-called "market-based finance" (Gabor 2020). This refers to the variety of financial actors outside the regulated banking

sector, including hedge funds, private equity, and off-balance sheet financing structures that largely operate outside of supervisory and regulatory oversight, are subject to little pressure regarding environmental risk disclosures, and have a big risk appetite (Kedward, Gabor, and Ryan-Collins 2022). In Europe and North America, for example, as banks have pulled out of oil and gas lending, less regulated and less risk averse actors - including private equity and hedge funds – have stepped in, purchasing oil and gas loan portfolios from traditional banks at major discounts (Porter and Deveau 2021).

THE ALTERNATIVE

REASSERTING DEMOCRATIC OVERSIGHT OVER THE PROVISION OF CAPITAL

The CBD should be a place to discuss new, promising, and democratic proposals about how to align financial flows with the Global Biodiversity Framework, not a place to reward and legitimize discredited, corporate-led proposals. Therefore we call on the CBD to remove the explicit references to the TNFD from its *Strategy for Resource Mobilization*. If such references are not removed from the text, the CBD would provide this ineffective and illegitimate initiative with de facto regulatory power. Such a stance would be undemocratic and would ultimately delegate the nature and pace of the green transition to businesses and private finance.

There is no shortage of alternatives to the risk disclosure approach. Binding commitments to eliminate harmful financial flows is a precondition to achieving the GBF objectives. Governments should update their National Biodiversity Strategy and Action Plans (NBSAPs) and their National Biodiversity Finance Plans (NBFPs) to include the strengthening of financial sector policies and regulations to support central banks, financial regulators and supervisors to include biodiversity and human rights criteria as core to their mandate (Forests & Finance 2024b).

REFERENCES

- Agarwala, Matthew, Matt Burke, Patrycja Klusak, Moritz Kraemer, and Ulrich Volz. 2024. "Nature Loss and Sovereign Credit Ratings." No. 2024-09. Accountancy, Economics, and Finance Working Papers. Edinburgh: Heriot-Watt University, Department of Accountancy, Economics, and Finance. https://www.econstor.eu/bitstream/10419/302571/1/1902518349.pdf.
- Almeida, Elena, Chiara Colesanti Senni, and Nepomuk Dunz. 2023. "Building Blocks for Central Banks to Develop Nature Scenarios." 11. The INSPIRE Sustainable Central Banking Toolbox.
- Ameli, Nadia, Sumit Kothari, and Michael Grubb. 2021. "Misplaced Expectations from Climate Disclosure Initiatives." *Nature Climate Change* 11 (11): 917–24. https://doi.org/10.1038/s41558-021-01174-8.
- Azizzudin, Khalid. 2021. "ESG Data Market 'Fertile Ground for Potential Conflicts of Interest', Says European Regulator." *Responsible Investor*, 2021. https://www.responsible-investor.com/esg-data-market-fertile-ground-for-potential-conflicts-of-interest-says-european-regulator.
- Banktrack. 2020. "Soft Commitments, Hard Lessons: An Analysis of the Soft Commodities Compact." https://www.banktrack.org/download/soft_commitments_hard_lessons_an_analysis_of_the_soft_commodities_compact/201130_scc_report_3.pdf.
- Bolton, Patrick, Morgan Despres, Luiz Awazu Pereira da Silva, and Romain Svartzman. 2020. *The Green Swan: Central Banking and Financial Stability in the Age of Climate Change*. Basel, Switzerland: Bank for International Settlements.
- Braun, Benjamin. 2020. "Asset Manager Capitalism as a Corporate Governance Regime." https://doi.org/10.31235/osf.io/v6gue.
- Calice, Pietro, Federico Diaz Kalan, and Faruk Miguel. 2021. *Nature-Related Financial Risks in Brazil*. Policy Research Working Papers. The World Bank. https://doi.org/10.1596/1813-9450-9759.
- Christophers, Brett. 2017. "Climate Change and Financial Instability: Risk Disclosure and the Problematics of Neoliberal Governance." *Annals of the American Association of Geographers* 107 (5): 1108–27. https://doi.org/10.1080/24694452.2017.1293502.
- ———. 2019. "Environmental Beta or How Institutional Investors Think about Climate Change and Fossil Fuel Risk." *Annals of the American Association of Geographers* 109 (3): 754–74. https://doi.org/10.1080/24694452.2018.1489213.
- Clapp, Jennifer. 2017. "Responsibility to the Rescue? Governing Private Financial Investment in Global Agriculture." *Agriculture and Human Values* 34 (1): 223–35. https://doi.org/10.1007/s10460-015-9678-8.
- Dafermos, Yannis, Daniela Gabor, Maria Nikolaidi, and Frank van Lerven. 2022. "An Environmental Mandate, Now What? Alternatives for Greening the Bank of England's Corporate Bond Purchases."
- Dempsey, Jessica. 2013. "Biodiversity Loss as Material Risk: Tracking the Changing Meanings and Materialities of Biodiversity Conservation." *Geoforum*, Risky natures, natures of risk, 45 (March):41–51. https://doi.org/10.1016/j.geoforum.2012.04.002.

- ———. 2016. *Enterprising Nature: Economics, Markets, and Finance in Global Biodiversity Politics*. Chichester, UK ; Hoboken, NJ: WILEY Blackwell.
- Dempsey, Jessica, Audrey Irvine-Broque, Patrick Bigger, Jens Christiansen, Bhumika Muchhala, Sara Nelson, Fernanda Rojas-Marchini, Elizabeth Shapiro-Garza, Andrew Schuldt, and Adriana DiSilvestro. 2022. "Biodiversity Targets Will Not Be Met without Debt and Tax Justice." *Nature Ecology & Evolution* 6 (3): 237–39. https://doi.org/10.1038/s41559-021-01619-5.
- Dibley, Arjuna, Thom Wetzer, and Cameron Hepburn. 2021. "National COVID Debts: Climate Change Imperils Countries' Ability to Repay." *Nature* 592 (7853): 184–87. https://doi.org/10.1038/d41586-021-00871-w.
- Eaglesham, Jean. 2022. "Wall Street's Green Push Exposes New Conflicts of Interest." *Wall Street Journal*, 2022. https://www.wsj.com/articles/wall-streets-green-push-exposes-new-conflicts-of-interest-11643452202.
- ECB. 2020. "Guide on Climate-Related and Environmental Risks." European Central Bank. https://www.bankingsupervision.europa.eu/ecb/pub/pdf/ssm.202011finalguideonclimate-relatedandenvironmentalrisks~58213f6564.en.pdf
- Forests & Finance. 2022. "Joint NGO Open Letter to TNFD Calls for Human Rights Approach, Impact Reporting and More." 2022. https://forestsandfinance.org/news/ngos-feedback-to-tnfd-calls-for-human-rights-approach-and-impact-reporting-and-more/.
- ———. 2023. "Banking on Biodiversity Collapse: Tracking the Banks and Investors Driving Tropical Forest Destruction." . https://profundo.nl/public/files/2023_Banking_on_Biodiversity_Collapse.pdf
- ———. 2024a. "Banking on Biodiversity Collapse: Tracking the Banks and Investors Driving Tropical Forest Destruction." https://forestsandfinance.org/banking-on-biodiversity-collapse.
- ———. 2024b. "Regulating Finance for Biodiversity: An Assessment for the Global Biodiversity Framework." https://forestsandfinance.org/finreg-assessment-2024
- Gabor, Daniela. 2020. "Critical Macro-Finance: A Theoretical Lens." *Finance and Society* 6 (May):45–55. https://doi.org/10.2218/finsoc.v6i1.4408.
- Hennig, Alicia, and Manuel Wörsdörfer. 2015. "Challenging Voluntary CSR-Initiatives – A Case Study on the Effectiveness of the Equator Principles." SSRN Scholarly Paper. Rochester, NY. https://doi.org/10.2139/ssrn.2627193.
- Hook, Leslie, and Matthew Vincent. 2020. "Green Business Reporting Rules at Risk of Pale Response." *Financial Times*, November 12, 2020, sec. Climate Capital. https://www.ft.com/content/ad01f2c9-9eb0-4db6-9898-220c688d16c2.
- InfluenceMap. 2022a. "Finance and Climate Change: A Comprehensive Climate Assessment of the World's Largest Financial Institutions." https://influencemap.org/report/Finance-and-Climate-Change17639.

- ———. 2022b. “Industry Influence on Biodiversity Policy. A Pilot Study Demonstrating Industry Associations’ Engagement on Biodiversity-Related Policy and Regulations.” https://influencemap.org/report/Finance-and-Climate-Change-17639.
- Irvine-Broque, Audrey, and Jessica Dempsey. 2023. “Risky Business: Protecting Nature, Protecting Wealth?” *Conservation Letters* 16 (4): e12969. https://doi.org/10.1111/conl.12969.
- Johnson, Justin Andrew, Giovanni Ruta, Uris Baldos, Raffaello Cervigni, Shun Chonabayashi, Erwin Corong, Olga Gavryliuk, et al. 2021. “The Economic Case for Nature: A Global Earth-Economy Model to Assess Development Policy Pathways.” Washington, DC: World Bank. https://openknowledge.worldbank.org/handle/10986/35882.
- “Joint Open Letter to the TNFD.” 2023, May 31, 2023. https://forestsandfinance.org/wp-content/uploads/2023/06/Joint-CSO-letter-to-the-TNFD-May-2023-EN-ID-PT-FR-ES-CH.pdf.
- Kedward, Katie, Daniela Gabor, and Josh Ryan-Collins. 2022. “Aligning Finance with the Green Transition: From a Risk-Based to an Allocative Green Credit Policy Regime.” *SSRN Electronic Journal*. https://doi.org/10.2139/ssrn.4198146.
- Kedward, Katie, Josh Ryan-Collins, and Hugues Chenet. 2022. “Biodiversity Loss and Climate Change Interactions: Financial Stability Implications for Central Banks and Financial Supervisors.” *Climate Policy* 0 (0): 1–19. https://doi.org/10.1080/14693062.2022.2107475
- Klooster, Jens van ’t. 2023. “Reflections on the 2022 Nobel Memorial Prize Awarded to Ben Bernanke, Douglas Diamond, and Philip Dybvig.” *Erasmus Journal for Philosophy and Economics* 16 (1). https://doi.org/10.23941/ejpe.v16i1.745.
- Kolkman, Roos. 2023. “The EU Deforestation Regulation – Turning a Blind Eye to the Role of EU Banks and Investors?” 2023. https://www.uu.nl/en/utrecht-centre-for-water-oceans-and-sustainability-law/student-work/the-eu-deforestation-regulation-turning-a-blind-eye.
- Krahé, Mark. 2021. “From System-Level to Investment-Level Sustainability. An Epistemological One-Way Street.” Royal Academy of Belgium. https://www.euro-case.org/from-system-level-to-investment-level-sustainability-an-epistemological-one-way-street.
- Martínez-Jaramillo, Serafin, and Ricardo Montanez-Enriquez. 2021. “Dependencies and Impact of the Mexican Banking Sector on Ecosystem Services.” NGFS-INSPIRE Working Paper.
- Monitoring Committee. 2020. “Final Monitoring and Progress Report: Dutch Banking Sector Agreement on International Responsible Business Conduct Regarding Human Rights,” July. https://www.imvoconvenanten.nl/-/media/imvo/files/banking/banking-final-report-2020.
- NGFS. 2023. “Nature-Related Financial Risks: A Conceptual Framework to Guide Action by Central Banks and Supervisors.” Technical document.
- O’Gorman, Margaret. 2021. “Reframing Business and Biodiversity beyond a Single Metric, a Single Impact and a Single Value.” IPBES. March 25, 2021. https://www.ipbes.net/node/38159.

- Peter, Dauvergne. 2018. "The Global Politics of the Business of 'Sustainable' Palm Oil." *Global Environmental Politics* 18 (April):34–52. https://doi.org/10.1162/glep_a_00455.
- Pfeifer, Stephanie, and Rory Sullivan. 2008. "Public Policy, Institutional Investors and Climate Change: A UK Case-Study." *Climatic Change* 89 (August):245–62. https://doi.org/10.1007/s10584-007-9380-y.
- Porter, Kiel, and Scott Deveau. 2021. "Shadow Lenders Pile Into U.S. Energy Debt After Bank Retreat." *Bloomberg*, 2021. https://www.bloomberg.com/news/articles/2021-06-25/shadow-lenders-pile-into-u-s-energy-debt-after-bank-retreat.
- Prodani, Julia, Sebastien Gallet, David-Jan Jansen, Ide Kearny, Guido Schotten, Guus Brouwer, Willem-Jan van Zeist, and Alexandra Marques. 2023. "The Economic and Financial Stability Repercussions of Nature Degradation for the Netherlands: Exploring Scenarios with Transition Shocks." Occassional Studies. De Nederlandsche Bank. https://www.dnb.nl/media/0vdpjz2i/77295_dnb_brochure_nature_scenarios_tg-pdfa.pdf.
- Rainforest Action Network. 2024a. "Banking on Climate Chaos: Fossil Fuel Finance Report 2024." https://www.bankingonclimatechaos.org/wp-content/uploads/2024/07/BOCC_2024_vF3.pdf.
- ———. 2024b. "Companies Accused of Biodiversity or Human Rights Harms 'Adopt' TNFD Reporting." 2024. https://forestsandfinance.org /news/companies-accused-of-biodiversity-or-human-rights-harms-adopt-tnfd-reporting/.
- Ranger, Nicola, and Tom Oliver. 2024. "Assessing the Materiality of Nature-Related Financial Risks for the UK."
- Schreiber, Paul, Lucie Pinson, and Eren Can Ileri. 2020. "Who Is Opposing the EU Taxonomy for Polluting Activities." Reclaim Finance. https://reclaimfinance.org/site/wp-content/uploads/2020/12/Report-In-the-shadows-Who-is-opposing-a-taxonomy-for-polluting-activities-Reclaim-Finance.pdf.
- Svartzman, Romain, Etienne Espagne, Julien Gauthey, Paul Hadji-Lazaro, Mathilde Salin, Thomas Allen, Joshua Berger, Julien Calas, Antoine Godin, and Antoine Vallier. 2021. "A 'Silent Spring' for the Financial System? Exploring Biodiversity-Related Financial Risks in France." WP 826. Banque de France. https://publications.banque-france.fr/sites/default/files/medias/documents/wp826_0.pdf.
- TNFD. 2022. "About." 2022. https://tnfd.global/about/#who.
- ———. 2023. "Recommendations of the Taskforce on Nature-Related Financial Disclosures." https://tnfd.global/wp-content/uploads/2023/08/Recommendations_of_the_Taskforce_on_Nature-related_Financial_Disclosures_September_2023.pdf.
- Toor, Joris van, Danijela Piljic, and Guan Schellekens. 2020. "Indebted to Nature: Exploring Biodiversity Risks for the Dutch Financial Sector." DNB, PBL. https://www.dnb.nl/media/4c3fqawd/indebted-to-nature.pdf.
- Trase. 2020. "The State of Forest-Risk Supply Chains." http://resources.trase.earth/documents/Trase_Yearbook_Executive_Summary_2_July_2020.pdf.

- Vermeulen, Robert, Edo Schets, Melanie Lohuis, Barbara Kölbl, David-Jan Jansen, and Willem Heeringa. 2018. “An Energy Transition Risk Stress Test for the Financial System of the Netherlands.” De Nederlandsche Bank. https://www.dnb.nl/media/pdnpdalc/201810_nr-_7_-2018-_an_energy_transition_risk_stress_test_for_the_financial_system_of_the_netherlands.pdf.
- World Bank and Bank Negara Malaysia (BNM). 2022. *An Exploration of Nature-Related Financial Risks in Malaysia*. World Bank. https://doi.org/10.1596/37314.

Milieudefensie
Friends of the Earth Netherlands
Postbus 19199, 1000 GD Amsterdam
service@milieudefensie.nl
www.milieudefensie.nl

© Milieudefensie, 2024