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Sticky Issues with the National Reports

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2026 is a key year for the implementation of the KMGBF and the CBD as a whole. At this year's COP in Armenia, we should have before us a Global report that tells us where we are on track and where we are off track to reach our targets by 2030. This global stocktake will enable us, and incentivize us, to pinpoint the major gaps and to upscale action in order to achieve the targets. It will be essential to set up evaluation processes of the different measures that are being implemented. Which policy options bring real benefit for biodiversity, which ones don't?

In order to have a good and well-founded global report, it is necessary that every party reports on their progress and, importantly, where they are standing in relation to the achievement of the targets through their 7th national reports, within the given deadline. However, developing country Parties face numerous challenges in submitting their reports. We call for the speedy provision of financial resources to enable them to do so within the expected timeline. A first submission has been made on Friday, and we encourage countries to make every effort to hand in their reports on time. At the same time, we are concerned about ongoing deregulation processes in many countries that can severely slow down progress in the next reporting phase and jeopardize the achievement of the KMGBF.

The implementation of the KMGBF can only work if it continues to be a collaborative effort. Participation of civil society is essential. In this context, we note that while there are some good examples of keeping civil society involved, there are also some national reports where we have not been consulted.

Non-state actors are invited to submit their commitments by the end of this month. While this is an opportunity to show the role that civil society organisations have in implementing the KMGBF, but it also gives an opportunity to corporations for greenwashing. More clarity is needed on how these non-state actor commitments will be used. What is clear is that it is the national reports of parties that need to give the necessary information to develop a global report that gives us an understanding where we stand in the implementation of the KMGBF.

Finally, we note that some groups, particularly smaller or less formally recognized organisations, face practical barriers in navigating the submission process in the Online Reporting tool. We would like parties to be aware of these challenges.

Burdensome Debt Curbs Biodiversity Protection

Third World Network and allies

In 2024, Parties to the CBD requested that the Secretariat commission a study on the relationship between debt sustainability and implementation of the Convention. The study's findings have important implications for resource mobilization discussions at SBI-6, though conclusions and policy recommendations should await a full and transparent review. The final, peer-reviewed study should inform continued SBI-7 deliberations and recommendations to COP.

The draft report makes one point unmistakably clear: biodiversity finance is predominantly a public finance issue, and, as a result, resource mobilization is directly exposed to fiscal conditions and debt service obligations. This may be an obvious point to those who face these constraints, but it has so far been under-explored as a key barrier to the implementation of the Convention.

The study also highlights the limited role of innovative financial mechanisms in addressing these constraints. While debt-for-nature swaps and green or blue bonds are frequently promoted as *win–win* solutions, the report finds that their impact on reducing debt stocks and debt service burdens has been modest. Evidence from other reports also shows that the impact of such mechanisms in effecting biodiversity outcomes is oftentimes limited. Overestimating the utility of such mechanisms risks obscuring the scale of the structural problem.

However, the report sidesteps a crucial dimension: how these burdensome conditions of debt are drivers of biodiversity destruction, not just constraints on biodiversity spending. Debt service pressures — shaped by structural imbalances in the international financial system — can push countries to expand extractive, export-oriented sectors to earn foreign exchange and stabilize their economies. High interest rates, balance-of-payments pressures, threats of credit rating downgrades, and risks of capital flight create strong incentives to open new extractive frontiers, often in biodiverse areas.

These dynamics are not limited to countries in formal debt distress. Even nations considered fiscally stable may face structural constraints that limit their ability to reform extractive sectors or pursue transformative economic pathways. The result is a persistent trade-off between social and ecological stability on one hand, and creditor repayment on the other. Reforming these perverse incentives will be necessary in order to support government efforts to chart a more sustainable and just path.

If the CBD is to deliver transformative change, as called for by IPBES, debt must be recognized not only as a fiscal constraint but as a systemic driver of biodiversity destruction. There is thus an urgent need for continued engagement with the structural economic conditions that shape harmful financial flows and biodiversity outcomes, including coordination across UN conventions and processes such as the emerging UN Tax Convention.

Further, alternative debt-management pathways must be explored — pathways that expand fiscal space without relying on biodiversity-harming extraction.

Protecting biodiversity requires more than new funding streams. It requires confronting the financial structures that systematically undermine ecological stability. Diagnosing these structures and reforming them would allow for greater biodiversity action.

Recycling Loss Is Not Resource Mobilisation

Rainforest Action Network

Developing countries are right to insist on scaled-up, predictable and grant-based biodiversity finance. New and additional public finance remains essential to implement the Global Biodiversity Framework, particularly for countries facing severe fiscal constraints.

But resource mobilisation cannot be measured only by how much new money is raised. It must also be judged by the overall direction and balance of financial flows affecting biodiversity.

Today, harmful incentives and private financial flows continue to outweigh positive biodiversity finance by orders of magnitude. Agricultural and other subsidies still incentivise ecosystem degradation. Public and private finance continues to drive activities that result in deforestation, land conversion, rights violations and overexploitation. When destructive flows continue to exceed biodiversity-positive finance, we are not mobilising resources, we are recycling loss.

Reforming harmful subsidies is about reorienting public finance toward resilient, biodiversity-positive livelihoods. Just transition principles must guide this shift: prioritising small-scale farmers, fishers and Indigenous Peoples, strengthening agroecological approaches, and safeguarding income stability and food security. Reform should reduce harm without transferring risk or volatility onto already vulnerable communities.

The same logic applies to private finance. Banks, insurers and investors continue to underwrite biodiversity-harmful activities. Voluntary initiatives will not realign financial systems. Parties should consider, in accordance with national circumstances, policy and regulatory measures that help align financial flows with biodiversity objectives. This approach reflects existing commitments under the Global Biodiversity Framework, including Targets 14, 18 and 19, and the direction already set in decision 16/34 to reform harmful incentives and align financial flows.

Debt dynamics make this even more urgent. Many countries face fiscal pressures that can incentivise short-term, extractive revenue strategies. Without addressing the interaction between debt, harmful incentives and biodiversity loss, resource mobilisation risks being undermined by structural constraints.

COP17 credibility will depend not only on pledges of new finance, but on whether Parties address the full financial picture. Scaling public finance and reforming harmful flows are not competing priorities, they are complementary pillars of effective implementation.

Resource mobilisation must mean that biodiversity is financially supported and relieved from systemic pressure, not structurally undermined. The direction of finance matters.

A Gender Perspective on Specialized ABS Instruments

Meenal Tatpati, Independent lawyer-researcher and member, CBD Women's Caucus

Discussions under Article 4(4) of the Nagoya Protocol are often framed as technical debates about legal coherence. Yet the choices Parties make regarding the recognition of specialized international *access and benefit-sharing* (ABS) instruments carry significant political and social implications.

Article 4(4) was intended to enhance legal clarity and avoid duplication, not to dilute or fragment the core obligations of the Nagoya Protocol. Any approach to recognizing specialized instruments must therefore remain firmly anchored in the objectives of the CBD and the Nagoya Protocol: t**he fair and equitable sharing of benefits arising from the utilization of genetic resources,respect for customary laws and community governance systems, and the protection of the rights and interests of Indigenous Peoples and local communities.**

A gender perspective is essential in this discussion. Women belonging to Indigenous groups and local communities are often the primary holders, users and transmitters of genetic resources and associated traditional knowledge. In many communities, women are responsible for seed selection and conservation, medicinal plant knowledge, food systems management, and the intergenerational transmission of ecological knowledge. Yet their contributions are frequently undervalued, under-documented, or excluded from formal ABS arrangements. When access and benefit-sharing frameworks are weakened, fragmented, or overly technocratic, it is often women who bear the disproportionate consequences, whether through loss of control over resources, exclusion from negotiations, or inequitable distribution of benefits.

The recognition of specialized international ABS instruments must therefore not create parallel regimes that bypass safeguards on equity and participation. The indicative criteria currently under consideration are welcome and should establish clear minimum standards to ensure that any recognized specialized instrument is consistent with the objectives of the CBD and the Nagoya Protocol and does not undermine them. This includes explicit attention to gender-responsive governance and benefit-sharing mechanisms. And gender-responsive benefit-sharing goes beyond counting women's participation. It requires ensuring that benefits, both monetary and non-monetary, reach women in tangible ways, including through capacity-building, livelihood support, recognition of traditional knowledge systems, and access to decision-making spaces. It also requires safeguards that ensure women's meaningful participation, particularly where customary governance systems may not automatically guarantee gender equality.

Recognizing specialized instruments should not legitimize arrangements that fall short of equitable standards or weaken community rights. Clear criteria, transparency in recognition processes, and consistency with international human rights obligations are essential to maintaining the integrity of the Nagoya Protocol. Ultimately, the debate on Article 4(4) is not merely about institutional alignment but also about ensuring that global biodiversity governance remains rooted in justice. Legal coherence must reinforce, not erode, the principles of fairness, equity and rights. Integrating a gender-responsive approach into the recognition of specialized ABS instruments is therefore not an optional add-on; it is a necessary condition for fulfilling the promise of the CBD and the Nagoya Protocol.