



In this issue

- Opening statement
- Digital biopiracy
- LMO risk assessment
- Target 14

CBD Alliance opening statement

As we speak today, biodiversity loss continues to accelerate, driven by extractive economic models, industrial agriculture, unsustainable production and consumption, pollution, infrastructure expansion, harmful subsidies and growing corporate control over land, territories and waters.

COP17 must deliver the **transformative change** envisioned in the *Kunming-Montreal Global Biodiversity Framework* (KMGBF). This requires more than better implementation of existing targets. Parties must assess whether the Framework and related measures are effectively addressing the root causes of biodiversity loss and the inequities that sustain them.

The **Global Review** must be robust, participatory and accountable. It should identify implementation gaps, inadequate means of implementation, harmful incentives and the structural barriers that prevent transformative change. A key challenge is the persistent gap between biodiversity commitments and government decisions that continue to authorise or subsidise biodiversity-destructive activities. To close this gap, the Global Review should explicitly examine these policy and economic drivers and assess how they undermine implementation.

We welcome the important contributions of **IPBES** through its recent assessments and support the proposal to endorse the transformative change and Nexus assessments.

Addressing biodiversity loss requires **strong regulation of destructive industries and corporate actors**. Mainstreaming biodiversity cannot rely solely on voluntary commitments and reporting. Governments must adopt and enforce effective regulatory frameworks, ensure environmental accountability, strengthen impact assessment processes, guarantee public participation and

access to justice, and support the full and effective engagement of affected communities.

The **industrial agribusiness model** continues to harm biodiversity, ecosystems, livelihoods and human health. We need a transition to sustainable, equitable and humane food systems based on agroecology and the knowledge of small-scale food producers.

Biodiversity must not be commodified, privatised or financialised. We reject **biodiversity offsets**, carbon offsets, nature markets and other approaches that enable continued environmental destruction elsewhere.

Developed countries must first fulfil their **Article 20** obligations by providing public finance that is new, additional, predictable, adequate, accessible and non-debt-creating. Broadening the contributor base must not dilute those obligations or circumvent the Convention. A permanent financial mechanism must remain under COP authority and ensure direct access for developing countries, Indigenous Peoples and local communities, women and youth.

Biodiversity finance must be **equitable, rights-based and transformative**. It should directly reach Indigenous Peoples and local communities, women-led organisations and civil society through simplified and fair access mechanisms, meaningful participation in financial decision-making, strong environmental and social safeguards, gender-responsive approaches, transparent accountability and eSective grievance mechanisms. It must support Target 23 and the *Gender Plan of Action*, while addressing harmful subsidies, unsustainable debt, unjust fiscal systems and financial flows that incentivise environmental destruction, without exacerbating debt burdens or inequalities.

Biological and genetic resources, including digital sequence information (DSI), must be protected from biopiracy and digital biopiracy. Greater transparency, accountability and equitable benefit-sharing are needed, together with safeguards against conflicts of interest in DSI-related processes.

Finally, a **precautionary approach** must guide consideration of emerging technologies. **Synthetic biology** poses significant environmental, health and socio-economic risks. Horizon scanning, monitoring, impact assessment and capacity-building are therefore essential to enable informed and sovereign decision-making. We call upon all Parties to immediately cancel any testing of, licenses

for, or commercial approval of genetically modified trees and to implement the precautionary principle in good faith.

The people of the world can live in harmony with nature only if Parties address the real drivers and sectors of biodiversity loss. We also stress that the environmental and human consequences of wars and conflicts require urgent international attention. COP17 must reject false solutions, regulate and phase out destructive industries, uphold human rights, secure adequate public finance and deliver the just and transformative change that biodiversity and peoples urgently need.

~~~~~

## **Cali Fund should not inadvertently facilitate digital biopiracy**

### **DSI statement by CBD Alliance**

COP17 must stop the bleeding before treating the wound. The multilateral mechanism and Cali Fund must get DSI sharing right before asking provider countries to recognise the certificates issued by them. Two years after COP16, we have yet to see meaningful measures by Parties hosting DSI users and databases, as called for under paragraphs 13 and 11 of the modalities adopted by Decision 16/2.

Despite efforts by some databases to raise awareness of the Cali Fund, fundamental gaps remain in maintaining accountability and transparency with respect to DSI sharing and access. Users need clarity on whether DSI was lawfully made available. Provider countries and communities need to know the origins of DSI and whether its use falls under the multilateral mechanism or other ABS arrangements. This is the first step to ensure legal certainty.

The COP17 draft decision prioritizes recognition of Cali Fund certificates by provider countries, while remaining silent on incentives for user countries and measures expected of database-hosting countries. Meanwhile, intersessional processes have focused on asking provider countries to grant exemptions from national laws and communities to accord donor privileges to businesses making financial contributions.

We reject this reversal of obligations and the attempt to financialize ABS. Responsibility for making the Cali Fund work must lie with countries hosting DSI users and those facilitating inequitable extraction under the banner of open access - not with developing countries and communities from whose DSI is extracted and used, anonymously.

We call on database-hosting countries and operators to end anonymous access to DSI, thereby taking the first steps to prevent digital biopiracy. Researchers, R&D funders and international agencies must obtain necessary prior informed consent before making DSI public; databases must not make DSI public if no such consent is provided.

We urge provider countries and communities to strengthen oversight over DSI generation and use. Benefit-sharing must deliver more than monetary benefits, it must also ensure meaningful participation, scientific collaboration, safe technology transfer and the capacity to shape resulting innovations.

COP17 must discipline DSI sharing before demanding further concessions from provider countries. The Cali Fund should not inadvertently facilitate digital biopiracy. Weakening national laws and people's rights in exchange for access to its funds would defeat the very purpose of equitable benefit-sharing.

# The continued need for precautionary, holistic risk assessment guidance materials to ensure against new threats and mitigate old harms

*Eva Sirinathsinghji (Third World Network)*

Emerging LMO applications pose potentially irreversible risks, while fundamentally challenging risk assessment experiences and protocols. Meanwhile, first generation LMOs are exposing their forewarned threats to traditional agriculture, and raise long-term/cumulative risks that urgently warrant increased protections

The *Living Modified organism* (LMO) industry continues to evolve in its efforts to broaden potential species range, trait type, and technology being targeted. Stalling first generation LM crop trait innovations, advances in genome editing techniques, and an apparent increase in interest towards high-risk applications such as self-spreading applications, or the release of genome editors to engineer organisms post-release.

The conclusions of the recent AHTEG to forward multiple recommendations for additional guidance reflects these novel developments, including for LM microorganisms, LM algae, LM fish and LM organisms expressing genome editing machinery for pest or pathogen control.

These topics present numerous cross-cutting biosafety considerations that challenge existing risk assessment frameworks and should be supported by Parties such as risks of high spread, persistence, reproductive and evolutionary capacities, lack of controllability and reversibility, and fundamental knowledge gaps regarding underlying biology, ecology, evolutionary capacity, receiving environments and ecosystem interactions. This also challenges risk assessment experiences to date, which have focussed on limited numbers of LM crop traits and species.

The lack of control over their spread and persistence also raises key concerns regarding the ability to ensure against transboundary movement and to gaining full, prior and informed consent from potentially affected communities.

Meanwhile, first generation GM products are still overwhelmingly dominated by two traits of herbicide tolerance and insect resistance despite well-established harms to biodiversity, human health, socio-economic status and sovereignty of impacted communities. Evidence of adverse impacts to crops at the centre of origin are accumulating, posing a direct threat to food sovereignty, crop genetic diversity, traditional and indigenous agricultural practices and to wider biodiversity as a whole. Long-term and cumulative impacts also become increasingly prescient as more stacked traits and combinations of LM foods enter the food supply.

As such, the recommendation to develop technical notes to support specific risk assessment considerations on (1) Long-term and cumulative effects of genetic constructs and LMOs; and (2) Use of LMOs in centres of origin and in traditional agricultural systems. These are long overdue and should be supported as a matter of priority.

However, the devil is in the detail. Industry attempts to narrow and weaken assessments must be resisted.

As concluded by the AHTEG, any new guidance must be anchored in a precautionary approach, with a foundational basis in Annex III of the Protocol, to ensure that all potential unintended effects are indeed assessed in a precautionary manner. Anti-precautionary approaches needed to be rejected.

The Cartagena Protocol must never be degraded into a rubber-stamping exercise!

*The opinions, commentaries, and articles printed in ECO are the sole opinion of the individual authors or organisations, unless otherwise expressed.*

*We thank the Heinrich-Böll-Stiftung for their financial support.*  
**Submissions** are welcome from all civil society groups.  
**Email:** [lorch@ifrik.org](mailto:lorch@ifrik.org) or [eco@cbd-alliance.org](mailto:eco@cbd-alliance.org)

## Target 14: A promise unkept?

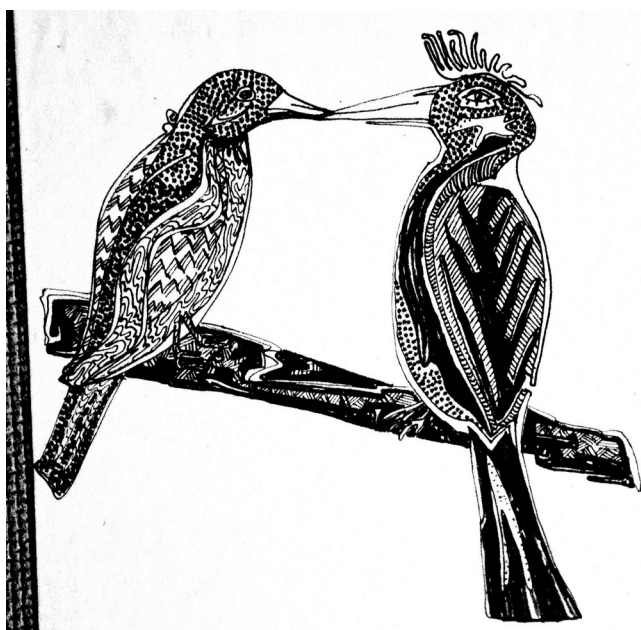
Tom Picken (Rainforest Action Network)

Four years ago, governments gathered to adopt the Kunming-Montreal Global Biodiversity Framework and committed, under Target 14, to progressively align public and private financial flows with its goals and targets. The Global Report poses an inconvenient question for Parties: **where, exactly, are the rules to make that happen?**

A new assessment, to be released today by the *Forests & Finance Coalition*, finds that, across 11 of the world's most strategically important financial jurisdictions, the answer is, largely, nowhere. (Please join us for a press conference panel on this at the CBD Press Conference Room at 1:30pm).

The report *Regulating Finance for Biodiversity: An Assessment for the Global Biodiversity Framework 2026*, reviewed financial regulation in Brazil, Canada, the Central African Economic and Monetary Community, China, the European Union, Indonesia, Japan, Malaysia, Singapore, the United Kingdom and the United States.

The analysis looks more deeply into why Target 14 is off-track, testing whether financial sector regulations have elements capable of delivering key GBF targets. Of 33 detailed assessments across the 11 jurisdictions, 30 landed in the red or dark red categories, with just three scoring a yellow partial score. Not one jurisdiction prohibits banks and investors from financing companies involved in deforestation or the conversion of natural ecosystems.



While there has been some observed progress on disclosure and taxonomies, there are no requirements on financial institutions to address their disclosed impacts nor are there mandates to ensure portfolio alignment with emerging taxonomy classifications.

This is particularly worrying given the increasing amounts of finance going into forest-risk sectors. *Forests & Finance* has conservatively identified USD \$894 billion in forest-risk-adjusted loans and underwriting to just 500 assessed companies involved in forest-risk commodities and metal and mineral mining between January 2016 and September 2026, including USD \$595 billion since 2020. That is a lot of biodiversity-impacting finance left untouched.

If Target 14 is to mean anything, governments need to rapidly scale up efforts to address harmful subsidies and to regulate financial flows driving biodiversity loss.

That means measuring and understanding the scale of these differentiated flows, mandatory due diligence for finance linked to deforestation and ecosystem conversion, biodiversity criteria in prudential regulation and central-bank operations, and time-bound targets for aligning portfolios with the Global Biodiversity Framework.

And because there is no just transition without justice, subsidy reforms and financial sector regulations must be designed to support and protect Indigenous Peoples and local communities, women, workers and other stakeholders, with meaningful sanctions and remedy obligations when financial institutions fail to comply.

There is still time to start making Target 14 real. But if governments continue to leave the financial system largely free to fund the destruction that the CBD is trying to stop, they should not be surprised when the numbers refuse to add up. Conservation finance will never be able to mop up the damage while the bulk of forest finance keeps driving harm.

Please join us for a press conference panel at the CBD Press Conference Room at 1:30pm