5 August 2026

Taskforce on Nature-related Financial Disclosures
International House, 36-38 Cornhill,
London, EC3V 3NG.
United Kingdom

Japanese Bankers Association

JBA Comments on Discussion paper on invasive alien species metrics by Taskforce on Nature-related Financial Disclosures (TNFD)

Dear Taskforce on Nature-related Financial Disclosures:

The Japanese Bankers Association[1] (JBA) appreciates the opportunity to provide its comments on the *Discussion paper on invasive alien species metrics*, released in July 2026.

We hereby submit our comments on the discussion paper, which have been compiled through consultations with our member banks. We would be grateful if you would give due consideration to our comments.

We would like to express our appreciation once again to the Taskforce on Nature-related Financial Disclosures for this opportunity, and we hope our comments will contribute to further consideration.

Yours faithfully,

Japanese Bankers Association

[1] The Japanese Bankers Association is the leading trade association for banks, bank holding companies and bankers associations in Japan. As of 1 July 2026, JBA has 110 Full Members (banks), 3 Bank Holding Company Members (bank holding companies), 78 Associate Members (banks & bank holding companies), 49 Special Members (regionally-based bankers associations) and one Sub-Associate Member for a total of 241 members.

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No.	Question	Comments
1.	Do you agree with the TNFD's proposed refinements to its IAS placeholder core global disclosure indicator and metric, and the proposal to include them on a 'comply or explain' basis? How could the proposed indicator and metric be improved?	We neither agree nor disagree with the proposed refinements. We consider the concept of capturing IAS-related risk across the entire process of introduction, establishment, and proliferation would be reasonable. However, the definition of high-risk IAS activities remains unclear, and certain methodological and practical challenges appear to remain unresolved. For financial institutions, a framework focused on practical application in priority areas would be preferable to requiring quantitative disclosure across the entire portfolio. Before making disclosure mandatory, priority should be given to establishing IAS as a practical and useful tool. In addition, the framework should explicitly state that the purpose of the indicator is to facilitate dialogue on risk, rather than to enable the comparability of disclosures.

No.	Question	Comments
2.	Do you agree with the proposed refinement to the current placeholder core global indicator and metric to address the introduction, establishment and spread of IAS, rather than introduction alone? Please explain your answer.	We neither agree nor disagree with the proposed refinement. We do not consider indicators and metrics that include establishment and spread are appropriate for use as a quantitative KPI across an entire portfolio or as a primary factor in credit risk assessment. It would be more reasonable to regard such information as supplementary. However, even as supplementary information, its use cases should be limited to areas such as reputational risk assessment and the confirmation of regulatory compliance.
3.	Do you agree with the proposed refinement to the additional disclosure indicator and metric on the number and extent of IAS? Please explain your answer.	We neither agree nor disagree with the proposed refinement. While there is some benefit in understanding the number and extent of IAS occurrence and spread, such information should be positioned as supplementary information to the extent that disclosure is feasible, and should not be subject to uniform mandatory disclosure requirements or treated as a key benchmark for comparison across organisations. Any interpretation of disclosed figures should take into account differences in regions, industries and capability of investigation. For financial institutions, as noted in our response to Question 2, it would be practical to limit the use of such information to support client dialogue or to serve as reference information at the individual transaction level.

No.	Question	Comments
4.	Do you have other additional disclosure metrics on IAS that you think the TNFD should include?	To avoid increasing disclosure burdens and deviating from actual business practices, the focus should be placed not on expanding indicators, but on providing practical guidance that can be effectively applied to address IAS-related risks and opportunities. We would strongly request that no additional quantitative KPIs be introduced as mandatory disclosure requirements. Instead, any such metrics should be treated as voluntary disclosures or information intended to support dialogue, with their use limited to key industries and priority regions.
5.	Does the proposed accompanying measurement guidance provide a sufficiently clear basis for organisations to identify relevant pathways that are likely to lead to the introduction, establishment and spread of IAS, to determine which of its activities have high IAS-related risks, and to assess whether measures taken to manage IAS-related risks are appropriate? If not, what additional clarification would be most useful for: a) Identifying relevant pathways that lead to the introduction, establishment and spread of IAS; b) Determining activities with high IAS-related risks; and c) Assessing whether measures taken to manage IAS-related risks are appropriate.	The proposed accompanying measurement guidance does not provide a sufficiently clear basis for financial institutions to assess the activities of clients and investees objectively. We would strongly request that practical usability be prioritised over scientific rigour in the design of the guidance.

No.	Question	Comments
6.	Do you have any further suggestions for how the TNFD should embed IAS in its framework?	IAS should not be expanded too broadly as a major theme within the TNFD framework, but rather be incorporated only in specific cases where it is relevant. While maintaining a cautious approach to mandatory disclosure, the framework should prioritise promoting practical application in high-risk industries. To avoid duplication of effort and increased disclosure burdens, the framework should be designed from the outset to clearly distinguish between responses intended for regulatory compliance purposes and those for corporate disclosure purposes. We would strongly request a simple and effective design that avoids unnecessary operational complexity.

(End)