

JBA comments on the TNFD Nature-related Risk & Opportunity Management and Disclosure Framework Beta v0.3

Questions	Comments
Overall framework	
What are strengths of the beta framework that you think should be retained?	—
How could we improve the TNFD framework?	—
Understanding Nature Component	
How useful was the TNFD Understanding Nature component?	Fairly useful
How could we improve the TNFD Understanding Nature component?	The definition of industry classification and risk should be unified among data platforms that are recommended to be used in each phase of the LEAP approach (which is also being promoted by the Data Catalyst Initiative). Some member banks had some difficulty estimating the nature-related risks associated with their investment and loan portfolios due to the difference between the industry categories defined by the EORA database and those defined internally by the banks.
Draft Disclosure Recommendations	
How useful are the TNFD Draft Disclosure Recommendations?	Fairly useful
How could we improve the TNFD Draft Disclosure Recommendations?	In Beta v0.3, specific classifications of risks and opportunities related to natural capital and indicators for measuring them have been made into concrete formalities to a certain extent. On the other hand, we expect that unified indicators and calculation methodologies for quantitatively measuring the financial impact of dependence and impact on natural capital will be included in future TNFD Draft Disclosure Recommendations.
How willing are you (from 1-10) to recommend the TNFD Disclosure Recommendations to others.	—
LEAP Approach	
How useful is the TNFD LEAP Approach?	Fairly useful

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How could we improve the TNFD Leap Approach?	We would like the TNFD to develop an evaluation methodology for cases where it is difficult to identify the location.
How willing are you (from 1-10) to recommend the TNFD LEAP Approach to others?	7
Metrics and Targets	
How useful is the TNFD draft approach to metrics and targets?	—
How could we improve the TNFD draft approach to metrics and targets?	It would be better to develop industry-specific scenarios to set metrics and targets.
Approach to specific guidance	
How could we improve the TNFD approach to specific guidance?	—
What additional guidance would be valuable to you?	—
Any Additional Recommendations	
What other recommendations / learnings / insights do you have for TNFD?	—