

GRI Topic Standard: Biodiversity Consultation

Association of British Insurers (ABI) response

About the ABI

The Association of British Insurers is the voice of the UK's world-leading insurance and long-term savings industry. A productive and inclusive sector, our industry supports towns and cities across Britain in building back a balanced and innovative economy, employing over **357,000** individuals in high-skilled, lifelong careers, two-thirds of which are outside of London.

Our members manage investments of **£1.6 trillion**, pay over **£17.2 billion** in taxes to the Government and support communities across the UK by enabling trade, risk-taking, investment and innovation. We are also a global success story, the largest in Europe and the fourth largest in the world.

The ABI represents over **200** member companies, including most household names and specialist providers, giving peace of mind to customers across the UK.

ABI High-level response to the GRI topic standard: biodiversity consultation

The ABI welcomes the GRI's publication of its consultation on the topic standard for biodiversity. We recognise the importance of biodiversity as an essential component of our world's natural capital, as well as the significance of international commitments such as the post-2020 Biodiversity Framework of the UN Convention on Biological Diversity or the Sustainable Development Goals.

The ABI encourages the GRI to clarify how Financial Institutions should respond to the proposed disclosure requirements. The supply chains of large institutional investors differ significantly to those of conventional real economy companies, where their biggest impact on nature and biodiversity is through the operations of investee companies. Should these proposals require Financial Institutions to disclose site-specific information from all investee companies, the locating and aggregating of such a large amount of data would result in a significantly increased reporting burden. Furthermore, this process would rely on extensive underlying data which may not be readily available. Consequently, we suggest the GRI consider the sequencing of introducing reporting requirements for real economy companies and financial institutions given the data dependencies in place and would welcome further supplemental guidance specific to financial institutions, which could include sample disclosures, to encourage effective adoption.

International interoperability of reporting requirements is an important issue for firms which operate across borders, and the fragmentation of reporting requirements leads to significant reporting burdens on these firms. The ABI would encourage the GRI to clarify the context and mapping between the GRI and TNFD disclosure requirements, as well as how these requirements could develop in the future. Where possible, the harmonisation of reporting requirements would encourage the pace of reporting adherence however, we do recognise the importance of tailoring to country-specific requirements.

We welcome more guidance on sector-specific biodiversity metrics and material sub-topics, and encourage GRI to also consolidate existing metrics when collaborating with CDP and other peer initiatives.