



Assessing what matters:

# The advantages of corporate biodiversity management implementation



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KPMG

# The drivers of biodiversity actions: from a double materiality assessment to gaining competitive edge

## Setting the scene

Biodiversity is increasingly and in a more structured way being discussed in the public arena as a key topic for the future of human life. It is recognized that biodiversity and balancing of ecosystems as such, is largely influenced by corporate behavior and needs to be mainstreamed in the economic sectors that have the greatest impact on biodiversity. This can be achieved through the integration of biodiversity considerations into the governance of companies, which is much more complex and comprehensive than complying to institutional reporting regulations, which is often prone to interpretations [\[11\]](#).

Many companies are dependent on biodiversity and ecosystems for their financial profit and continuity as they need nature and its services to operate their primary value chain. According to the World Economic Forum (2020), over half of the global GDP—approximately \$44 trillion—is moderately or highly dependent on nature and its services, such as pollination, natural resources, water purification, and climate regulation [\[19\]](#). As such, biodiversity loss is a major financial risk for companies. At the same time, the WWF's Living Planet Report (2024) underlines the significant impact that companies' behavior has on the environment, contributing to the rapid decline of biodiversity and the degradation of ecosystems [\[20\]](#). Hence companies contribute with their current behavior to increasing their own financial risk.



**Only by staying within our ecological footprint and working alongside nature can we secure a sustainable future for the next generations. There's no excuse for inaction—companies have access to the necessary tools and insights to transform their operations toward biodiversity-positive outcomes, aligning with strategic and regulatory priorities."**

**Koos Biesmeijer**

Naturalis

It is recognized that a substantial number of companies are increasingly (directly or indirectly) depend on or impact biodiversity, making them vulnerable to biodiversity-related risks [\[1\]\[3\]\[17\]\[6\]](#). In recent years biodiversity has moved up high on the institutional agenda resulting in an increasing development of the regulatory and policy landscape on business and biodiversity around the globe. In the EU the adoption of the Corporate Sustainability Reporting Directive (CSRD) and its accompanying European Sustainability Reporting Standards (ESRS) is foreseen to be a main driver for the significant growth in corporate engagement with biodiversity and ecosystems. ESRS E4 Biodiversity and ecosystems is one among ten topical ESRS in the ESG domain [\[5\]](#).

ESRS E4 requires organizations to assess their material impacts, risks and opportunities (IRO) on biodiversity and ecosystems throughout their entire value chain by means of a so-called Double Materiality Assessment (DMA). This includes an impact materiality assessment ("inside-out" view) and a financial materiality assessment ("outside-in" view). While the impact materiality assessment focuses on how the company's activities impact the environment and society, the financial materiality assessment covers how sustainability issues in the environment affect the company's financial performance. This dual approach ensures a more holistic assessment and addresses a wide range of stakeholders including investors, consumers and regulators. ESRS E4 further requires organizations, that identify material IRO's related to biodiversity and ecosystems, to disclose such information and

integrate considerations into their core strategies and operational decision making. Topics can become material from an impact or financial perspective or both, which determines the DMA results and implications on what matters to report [\[5\]](#).

Most companies have not yet fully recognized the business case for preserving biodiversity, often citing data challenges as the main barrier, even though there are quite some (scientific) data available on biodiversity [\[7\]](#). A study by the Nature Benchmark (2022–2024) of 400 companies reveals that only 5% assess their impact on nature, less than 1% understand their dependencies on natural ecosystems, and a mere 2% have boards equipped with relevant expertise in areas like biodiversity [\[13\]](#). This suggests that the real gap may lie in developing "nature intelligence"—the skills and knowledge required to interpret and act upon biodiversity data [\[14\]](#). Addressing this gap requires mainstreaming and embedding biodiversity into the core governance and operational frameworks of organizations. By integrating biodiversity considerations into decision-making processes and organizational structures, companies can transform their relationship with nature from one of dependency to one of stewardship, aligning with global commitments such as the Convention on Biological Diversity's (CBD) Global Biodiversity Framework (GBF) [\[2\]](#).

Though this can be stimulated and enabled by governmental regulations, such as the CSRD, an effective holistic mainstreaming approach goes beyond regulatory compliance and touches institutional interactions as well as motivational aspects, such as values and leadership, and ensuring sufficient means and resources [\[10\]](#).

Currently, a full and effective implementation of the CSRD is still a work in progress for many organizations, who struggle with the interpretations of the new rules and a lack of knowledge. The importance of biodiversity and the ecosystems services that it delivers to companies are often not (yet) properly recognized in the DMA and therefore unjustly deemed immaterial.

In this paper we will provide an overview of the relevant regulatory frameworks that could be navigated in respect of biodiversity and ecosystems, explore the risks of misjudging the materiality of their impact in the DMA assessment and how to improve and transcend regulatory reporting compliance into strategic biodiversity impact management. Continuous development of nature intelligence, data management and processes, stakeholder engagement, and a push for more standardized guidelines may prove to be crucial in helping organizations meet CSRD's long term goals.

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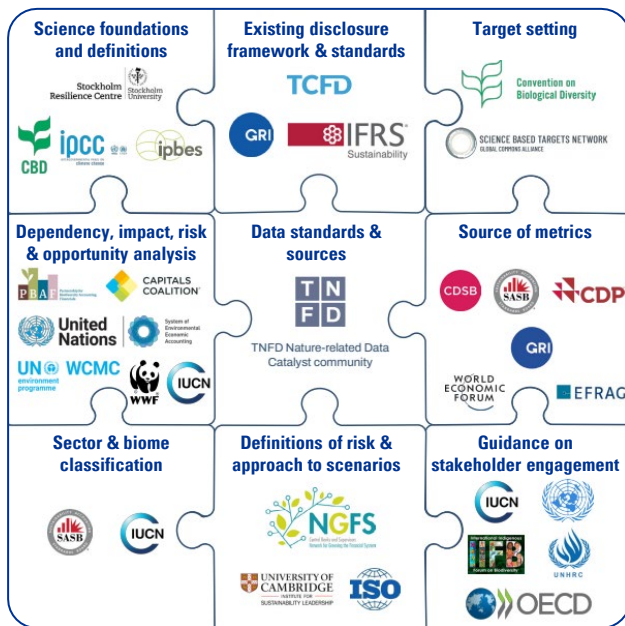
## The role of frameworks – Navigating the biodiversity reporting landscape

With the growing awareness and attention of both regulators and corporates for biodiversity losses, their direct and indirect impacts and associated business risks, the demand for structured assessments and effective monitoring and reporting methods has increased. The transient nature of biodiversity risk monitoring and reporting rules, often derived from global initiatives and not yet fully mature in their development nor implementation, as well as their interconnectedness with regulated financial and risk reporting frameworks, require companies to carefully navigate the relevant rules.

To systematically address these complexities, organizations can leverage comprehensive frameworks that align with international standards and global biodiversity goals. The Global Biodiversity Framework (GBF) emphasizes the integration of biodiversity into all aspects of governance, resonating with the need for structured mainstreaming approaches [\[10\]\[2\]](#). By subsequently adopting frameworks such as the Taskforce on Nature-related Financial Disclosures (TNFD) and the European Sustainability Reporting Standards (ESRS), companies can ensure that their biodiversity reporting aligns with both regulatory requirements and strategic sustainability goals [\[5\]\[16\]](#).

The overview below highlights the extensive array of existing frameworks, standards, and guidelines related to nature. These include global initiatives, regional regulations, industry-specific standards, and voluntary commitments:

Figure 1  
**Overview of biodiversity reporting frameworks, illustrating the multitude of biodiversity-related frameworks and their interconnections.** [\[16\]](#)



## Key Frameworks and Standards:

- European Sustainability Reporting Standards (ESRS):** Developed in response to the CSRD, ESRS includes a specific standard for biodiversity and ecosystems, known as ESRS E4. This standard requires biodiversity assessments throughout the value chain, prescribing double materiality assessments and setting the bar for mandatory biodiversity reporting in the EU. When biodiversity related IRO's are identified as material, stipulated Disclosure requirements become mandatory [\[7\]](#).
- International Sustainability Standards Board (ISSB):** The ISSB is developing global sustainability disclosure standards, which will have to be adopted into law by individual nations. Currently two standards have been published on climate, and other topics have been announced, including biodiversity. Its focus on providing a global baseline ensures that companies can align their sustainability reporting across multiple jurisdictions [\[10\]](#).

- Global Reporting Initiative (GRI) Standards (2024):** The GRI Standards are voluntary sustainability reporting standards issued by the Global Sustainability Standards Board (GSSB), an independent operating entity of the Global Reporting Initiative (GRI). GRI 101 provides a comprehensive framework for sustainability reporting, including specific disclosures on biodiversity impacts. It helps organizations communicate their contributions to sustainable development in a standardized manner. The Global Reporting Initiative has co-created the ESRS [\[9\]](#).
- Taskforce on Nature-related Financial Disclosures (TNFD, 2023):** TNFD offers a risk management and disclosure framework to help organizations report and act on nature-related risks. It focuses on enabling financial institutions and companies to integrate biodiversity considerations into decision-making processes using the LEAP-approach [\[16\]](#).

The LEAP (Locate, Evaluate, Assess, Prepare) approach is a structured framework for managing biodiversity impacts. It involves first locating and identifying areas of biodiversity significance, then evaluating the potential impacts of activities on these areas. This is followed by assessing the risks and preparing plans to mitigate negative effects and enhance biodiversity conservation [\[16\]](#).

- Science-Based Targets for Nature (SBTN):** SBTN provides guidance for setting measurable, science-based targets for nature, allowing companies to align their strategies with global environmental goals and contribute positively to biodiversity conservation [\[15\]](#).

# Beyond Compliance: Leveraging CSRD and DMA for strategic biodiversity management

Regulatory frameworks like the CSRD serve not merely as compliance requirements but as strategic tools highlighting areas critical to a company's long-term success. By emphasizing topics such as biodiversity and ecosystems, these regulations indicate that these areas are materially significant and warrant pro-active attention. The Double Materiality Assessment (DMA) can help companies identify not only that biodiversity is material, but also why and where. Careful assessment of the topic allows companies to effectively integrate biodiversity considerations into their biodiversity strategic planning, management and reporting thereon.

Properly identifying material issues through the DMA is crucial and forms the core of CSRD. Misidentifying biodiversity—underestimating or potentially overestimating its materiality—can lead to misallocated resources for measuring impact or overlooked risks, both of which can have significant reputational and financial consequences.

For instance, from an impact perspective companies show transparency, comparability and quality when disclosing on their biodiversity impacts. This consequently leads to gaining trust from stakeholders. From a financial perspective recognizing biodiversity as a material issue allows companies to mitigate risks associated with ecosystem degradation, supply chain disruptions, and regulatory penalties, while also capitalizing on opportunities such as improved stakeholder relations and sustainable innovation. This understanding sets the stage for the next section, which will explore examples of misidentification in DMA's and their consequences.

By leveraging regulations as strategic guides and accurately conducting DMAs, companies can move beyond compliance, pro-actively managing risks and opportunities related to biodiversity, and positioning themselves for resilience and sustainable growth.



# The importance of correctly identifying materiality

Understanding the potential pitfalls in materiality assessments is crucial. Misidentifying biodiversity as either material or immaterial can have significant consequences, both strategically and financially. In a Double Materiality Assessment (DMA), companies must carefully evaluate biodiversity impacts from both impact and financial perspectives, as material topics may differ depending on the assessment angle.

Several challenges complicate accurate assessments. Setting materiality thresholds requires balancing biodiversity considerations with existing financial or risk reporting frameworks and aligning these with the company's strategic priorities. The GRI notes that regulatory standards often provide varying levels of guidance, which can leave room for interpretation, potentially affecting consistency across assessments. Additionally, biodiversity assessments are frequently hindered by a lack of standardized metrics, which can lead to differing interpretations and increase the risk of either overestimating or underestimating biodiversity impacts <sup>[8]</sup>.

Data quality also poses a significant challenge, as many organizations face a "nature intelligence gap"—the skills and knowledge required to interpret and act on biodiversity data. Although scientific data on biodiversity loss is available, combining it meaningfully with company-specific data remains a challenge. This gap complicates efforts to ensure assessments reflect accurate and actionable insights <sup>[8]</sup>.

Below several examples illustrate the outcomes of accurate and inaccurate assessments:

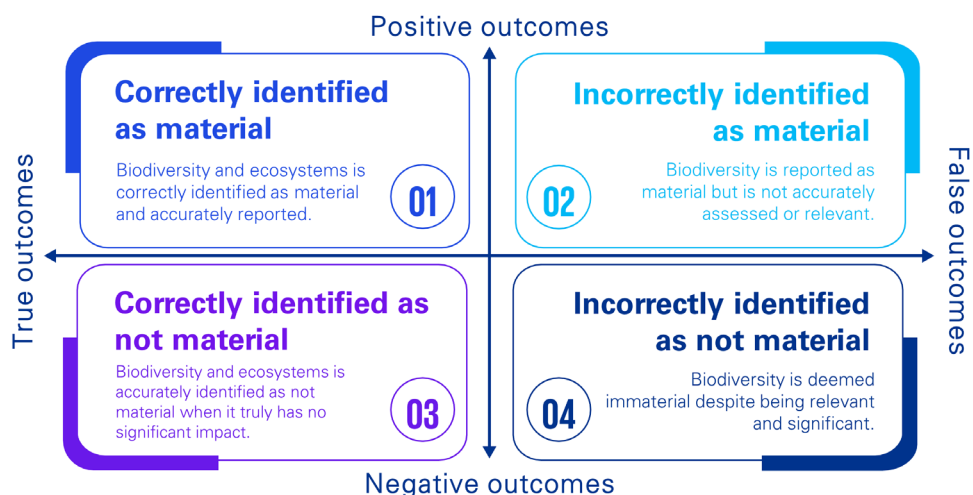
## 1. Correctly identified as material (True Positive): Biodiversity is correctly identified as material and accurately reported.

- **Example:** An agribusiness recognizes that its operations significantly impact local pollinator populations. By implementing measures such as creating pollinator-friendly habitats and reducing pesticide use, the company enhances biodiversity and improves crop yields.
- **Outcome:** The company not only mitigates risks related to pollinator decline but also capitalizes on increased productivity and strengthens its market position.

## 2. Incorrectly identified as material (False Positive): Biodiversity is reported as material but is not accurately assessed or relevant.

- **Example:** A manufacturing firm operating in an industrial zone believes its activities significantly impact local biodiversity. It allocates substantial resources to biodiversity initiatives that, upon closer examination, have minimal relevance to its actual operations.
- **Outcome:** The misallocation of resources leads to unnecessary costs without meaningful environmental benefits, potentially diverting attention from more material sustainability issues.

Figure 2  
Examples of (mis)identification in DMA and their consequences



**3. Incorrectly identified as not material (False Negative):** Biodiversity is deemed immaterial despite being relevant and significant.

- **Example:** A mining company assumes that biodiversity is not material to its operations and neglects to assess its impact on nearby wetlands. Over time, mining activities degrade the wetlands, leading to loss of ecosystem services, community backlash, regulatory fines, and costly remediation efforts.
- **Outcome:** The company faces financial losses, reputational damage, and operational disruptions that could have been avoided with proper assessment.

**4. Correctly identified as not material (True Negative):** Biodiversity is accurately identified as not material when it truly has no significant impact.

- **Example:** A software development company correctly determines that its office-based activities have minimal direct impact on biodiversity. Instead, it focuses its sustainability efforts on energy efficiency, electronic waste reduction, and responsible sourcing of IT equipment.
- **Outcome:** The company effectively allocates resources to areas where it can make a meaningful impact, improving its sustainability performance and stakeholder satisfaction.

These examples highlight the critical need for accurate and thorough materiality analyses to avoid false conclusions that can undermine biodiversity conservation efforts.

### The cost of misidentification

While many companies recognize biodiversity as an emerging priority, they often find the CSRD (Corporate Sustainability Reporting Directive) requirements challenging due to their complexity. Due to the significant reporting burden, some companies choose to place biodiversity on a 'watch list,' planning to gather more information in the following year to develop a more effective strategy. This can lead companies to focus on other areas of compliance, leaving biodiversity efforts underdeveloped or delayed, even as awareness of its importance grows.

However, preventing false negatives is particularly important. Environmental damage can lead to significant remediation costs—for example, the EPA recovered over \$10 million in a single incident at a mining site in South Dakota [\[4\]](#). Moreover, the World Economic Forum (2020) highlights that biodiversity loss poses a significant risk to global economic stability, potentially disrupting \$44 trillion worth of economic value generation [\[19\]](#). This highlights the substantial financial risks companies may face when environmental impacts are not accurately identified and addressed.

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## Mitigating misidentification in biodiversity DMA – A biodiversity maturity model

To effectively bridge the "nature intelligence gap" and improve the accuracy of biodiversity double materiality assessments, organizations need a structured approach that not only addresses the challenges of data variability and interpretation in the DMA but also provides a pathway to manage risks and opportunities when deemed material to the best of their abilities at a certain moment in time. The five-stage biodiversity maturity model

provides such a framework, enabling companies to move from basic awareness to industry-leading, nature-positive practices. This model not only addresses the challenges identified in DMA's but also supports biodiversity management and strategic decision-making for sustainable growth.

Figure 2

**Five-Stage Biodiversity Reporting Maturity Model illustrating the progression from awareness to transformative leadership** [\[6\]](#) [\[18\]](#) [\[10\]](#)





## Pathways to the next stage

## Outcomes

### Stage 1: Awareness

- **Conduct educational workshops:** Organize introductory sessions on biodiversity's relevance to business sustainability and resilience.
- **Perform preliminary impact and dependency assessments:** Map out high-level biodiversity impacts and dependencies related to core business operations.
- **Raise internal awareness:** Communicate the potential long-term benefits of biodiversity, such as risk mitigation, regulatory compliance, and enhanced reputation.
- **Explore reporting frameworks:** Research and evaluate introductory biodiversity reporting frameworks like TNFD (Taskforce on Nature-related Financial Disclosures), SBTN (Science-Based Targets for Nature) or the Natural Capital Protocol to understand their applicability.

- **Increased awareness:** Leadership and teams are aware of biodiversity's basic principles and relevance.
- **Identified impact areas:** Broad biodiversity impact areas are recognized but not yet measured in detail.
- **Preliminary framework familiarity:** The organization begins exploring biodiversity frameworks, laying the groundwork for more structured reporting.

### Stage 2: Exploration

- **Pilot data collection programs:** Implement targeted biodiversity data collection in specific operational areas to build a baseline.
- **Initiate pilot reporting:** Develop a preliminary biodiversity report for one operational unit to test and refine reporting processes.
- **Provide internal training:** Train relevant teams on biodiversity data collection, reporting standards, and the importance of consistent data practices.

- **Baseline biodiversity data:** Preliminary biodiversity data is collected in high-impact areas, allowing for basic analysis.
- **Pilot reporting framework:** Initial reporting structures are created, covering basic biodiversity metrics.
- **Regulatory compliance:** The company meets baseline biodiversity-related compliance requirements.

### Stage 3: Implementation

- **Expand reporting scope:** Broaden biodiversity reporting to encompass all operational areas, moving beyond initial pilot projects.
- **Standardize data collection protocols:** Develop and implement company-wide standardized protocols for biodiversity data collection and reporting.
- **Embed biodiversity in risk management:** Integrate biodiversity assessments into the overall risk management framework to proactively identify and mitigate biodiversity-related risks.

- **Integrated biodiversity reporting:** Biodiversity data is part of ESG reports, enabling a more comprehensive view of sustainability performance.
- **Consistent data collection:** Standardized protocols ensure reliable biodiversity data collection across operational units.
- **Improved risk management:** Biodiversity insights contribute to identifying and managing business risks.

### Stage 4: Strategic integration

- **Set science-based targets:** Establish clear, science-based biodiversity targets (e.g., net-positive biodiversity impact) aligned with global standards.
- **Develop biodiversity KPIs:** Create and integrate biodiversity-related KPIs into overall business performance metrics, ensuring accountability at all organizational levels.
- **Expand biodiversity impact assessments:** Extend biodiversity impact assessments to include indirect impacts across the supply chain, integrating biodiversity metrics into supplier and partner evaluations.
- **Lead industry collaboration:** Participate in or lead industry coalitions focused on biodiversity standards and collaborative conservation efforts.
- **Invest in regenerative projects:** Commit to and invest in nature-positive projects that go beyond mitigation, such as habitat restoration, species reintroduction, and ecological regeneration initiatives.

- **Improved biodiversity metrics:** Biodiversity KPIs drive strategic planning, influencing long-term sustainability goals.
- **Cross-functional collaboration:** Cross-departmental alignment enables more effective biodiversity integration.
- **Proactive risk mitigation:** Biodiversity insights inform business decisions, reducing risk and enhancing resilience.

### Stage 5: Transformative leadership & continued improvement

- **Innovate in biodiversity monitoring:** Adopt cutting-edge technologies and methodologies for biodiversity monitoring to improve data accuracy and comprehensiveness.
- **Cultivate a culture of stewardship:** Embed biodiversity as a core organizational value, celebrating biodiversity achievements and creating an environment of continuous engagement.
- **Advocate for policy change:** Actively participate in shaping biodiversity policies and standards, collaborating with industry groups, governments, and NGOs to drive systemic change.

- **Leadership positioning:** Recognized as an industry leader, the company influences peers and drives biodiversity policy.
- **Biodiversity restoration:** Projects contribute to biodiversity restoration, with measurable positive ecological impacts.
- **Sustainable competitive advantage:** Long-term biodiversity commitments improve reputation, stakeholder trust, and competitive positioning.

The model encompasses five distinct stages:

- 1. Awareness:** Recognizing biodiversity's importance without structured action.
- 2. Exploration:** Initiating data collection and compliance-driven reporting.
- 3. Implementation:** Actively measuring and integrating biodiversity data into ESG frameworks.
- 4. Strategic integration:** Proactively managing biodiversity dependencies and aligning with strategic goals.
- 5. Transformative leadership:** Leading industry efforts, advocating for policy changes, and achieving regenerative biodiversity impacts.

Each stage outlines specific challenges organizations may face, actionable pathways to progress, and tangible outcomes that signify advancement in biodiversity strategy, management and reporting. By integrating these dimensions, the maturity model not only provides a pathway for organizations to enhance their biodiversity strategies, management and reporting but also ensures that these are sustainable, contextually relevant, and deeply embedded within the operational ethos of those organizations.

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## Conclusion

Biodiversity loss poses a critical risk to businesses and the global economy, while continued impact on biodiversity, by the way many companies currently operate, threatens the very ecosystems that businesses also rely on for support of essential ecosystem services, like pollination, water purification, and climate regulation. Accurately identifying biodiversity as a potential material issue through Double Materiality Assessments (DMAs) is essential for companies to navigate these challenges effectively. However, many organizations struggle with the "nature intelligence gap"—the lack of skills and knowledge needed to interpret and act on biodiversity data.

Embracing a structured approach to mainstreaming biodiversity, as outlined in the five-stage maturity model, enables companies to systematically integrate biodiversity considerations into their evolving governance and operational frameworks and reporting thereon. This integration ensures that biodiversity is not just a regulatory reporting requirement but a fundamental component of business strategy, aligning with global

commitments such as the CBD's Global Biodiversity Framework (GBF). By aligning with the Corporate Sustainability Reporting Directive (CSRD) and its European Sustainability Reporting Standards (ESRS E4), companies can leverage these regulations to not only achieve compliance but also to advance towards the global biodiversity targets set by the CBD's GBF.

By diligently assessing biodiversity in their materiality assessments, based on reliable data and embedding these insights into core business strategies, companies not only ensure compliance but also gain a competitive edge. Proactively managing biodiversity impacts, dependencies, risks and opportunities allows organizations to locate their impacts, mitigate potential disruptions in their supply chains, improve their reputation with consumers and investors, and anticipate regulatory changes. By integrating biodiversity into core business practices today, companies can build resilience and secure their place in a rapidly evolving, nature-driven economy.

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# About the collaboration between Naturalis & KPMG

For more than 30 years, KPMG has had a sustainability department with more than one hundred and fifty experts. They use their expertise to help clients develop their sustainability strategy, report on their climate goals, verify sustainability information and turn complex data into concrete insights and plans.

Naturalis is the national biodiversity research institute. Over one hundred and forty scientists dedicate themselves every day to the description, understanding and conservation of biodiversity. In doing so, they contribute to solving major global problems related to climate, habitat, food and medicine. In addition, Naturalis is an international leader in collecting and providing access to digital biodiversity information.

This collaboration brings together two worlds: Naturalis' scientific knowledge of biodiversity and KPMG's experience in advising on sustainability, strategy and implementation. Through this collaboration, organizations and companies can be better advised on their impact on nature and biodiversity.

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