



RSPB Policy Position: Nature-related reporting and planning for business

January 2026

Summary

This document provides an overview of the RSPB's position on nature-related disclosures, transition planning and action from corporates. This is a UK-focused position and includes the RSPB's position on the Taskforce for Nature-related Financial Disclosures (TNFD), the UK Sustainability Reporting Standards (UKSRS) and mandating corporate transition plans in the UK.

Due to the recent UK Government consultations on UKSRS and corporate transition planning focusing on climate, the RSPB would like to emphasise the need for nature to be prioritised equally throughout this briefing paper.

Our economies, livelihoods and wellbeing all depend on our most precious asset: nature. As put in the Dasgupta Review, the solution starts with understanding and accepting a simple truth: our economies are embedded within nature, not external to it¹. A nature positive, net zero economy will not be reached without significant action from the private sector and business.

The RSPB advocates for nature-related disclosures, publishing of corporate nature strategies and, most importantly, business action for nature. It is recognised that reporting and planning is just the first step, we need credible action, supported by the right metrics, policies and alignment across standards. The RSPB is keen to see nature being given the same level of priority and urgency as climate action. The RSPB is supportive of the development of the UK Sustainability Reporting Standards and keen to see nature-specific requirements included within these.

Introduction

All businesses must recognise that they exist within nature and rely upon it to succeed. Some businesses have already made significant progress in embedding nature-related information into their strategies, but this practice must be adopted more widely. Recent reports, including the Green Finance Institute's 2024 analysis², highlight that damage to

¹ [The Economics of Biodiversity The Dasgupta Review: Headline Messages](#)

² [Green Finance Institute](#)

the natural environment is already slowing the UK economy and could lead to a 12% reduction in GDP, surpassing the economic impact of the 2008 financial crisis and COVID-19. A National Security Assessment published in January 2026 emphasised the risk global ecosystem degradation and collapse poses to UK national security and prosperity. A nature positive economy cannot be achieved without business change, and business support is fundamental to the RSPB meeting its objectives.

Historically, businesses have treated nature as an externality and failed to factor it into their decision-making. As a result, nature has been undervalued and exploited through traditional business models. However, recent shifts in business thinking, campaigning from eNGOs and targets set in the [Global Biodiversity Framework](#), have demonstrated that there is a clear need and incentive for businesses to recognise nature; to understand, communicate and respond to both the impact nature has on their business, and the impact their business' activities have on nature. Well thought-out sustainability standards and transition strategies should progress this thinking. Effective management of nature-related issues is a central, strategic risk management issue and is crucial to continued business success and delivering growth.

Bringing TNFD, UKSRS and corporate transition planning together

The UK Government is currently developing the UK Sustainability Reporting Standards (UKSRS). These are based upon the globally-recognised ISSB's [IFRS S1](#) (Sustainability) and [S2](#) (Climate) standards. Alongside this, they are developing their stance on mandatory disclosure of transition plans for corporates and a regime for oversight of assurance for sustainability disclosures. The TNFD and ISSB recently announced they are converging future work. This is a positive step, increasing the likelihood of learnings from the TNFD being incorporated into the UKSRS.

The ISSB's S1 and S2 standards provide requirements for sustainability/climate-related financial disclosures. They require companies to disclose material risks and opportunities that could affect their financial performance or prospects. The development of an ISSB standard specific to Biodiversity and Ecosystem Services is being explored. The RSPB supports this development and the endorsement of a nature-specific standard within the UK. However, nature reporting must begin immediately. UKSRS S1 can be used to report on nature in the medium term.

The Taskforce for Nature-related Financial Disclosures (TNFD) is a global, corporate-led, voluntary framework. Since the ISSB and TNFD announced that they are converging their work, the ISSB has begun a process to focus on nature-related disclosures, drawing on previous work from TNFD. The RSPB welcomes this step. It provides a useful framework for reporting upon nature and the learnings from this should be incorporated into the development of the UKSRS. TNFD has carried out extensive research and produced much guidance for corporate nature reporting, disclosures and for the

creation of nature transition plans. The TNFD guidance is therefore a key focal point for nature-specific expertise.

The TNFD encourages companies to develop and disclose a nature transition plan. The UK Government are developing their stance on corporate transition plans but so far this has been focused on *climate* transition plans. The RSPB calls for separate climate and nature transition plans due the differing expertise and knowledge required for each and the tendency for nature to be overshadowed by climate in existing joint reports. Climate plans should also detail both their positive and negative impacts on nature. There is, however, also a requirement for a core sustainability function which ensures these plans inform one another, highlights the win-win of nature-based solutions in terms of climate mitigation, resilience, ecosystem services and wildlife and offers efficiency and collaboration.

At a sector level, the WWF and GFI's report³ calls for the co-development of 'Nature Positive Transition Pathways' by industry and government. This would provide further guidance as to the most impactful actions businesses can take and support the private sector in reducing impact and scaling investment. The RSPB supports this call.

TNFD

The RSPB has been generally supportive of the TNFD since its inception. The RSPB recognises the need for a nature-focused framework to work alongside general sustainability and climate-related disclosures and strategies from corporates. It is positive to see increased momentum in this area of work. It is recognised that this a fast-moving area of work, with continually updating guidance.

The RSPB advocates for nature-related disclosures, publishing of corporate nature strategies and most importantly, acting for nature. The RSPB understand the complexity of nature reporting, in comparison to climate. For example, regarding climate, companies are asked only to report on pressures e.g. tonnes of CO₂ whereas for nature they are asked to report on both pressures and impacts e.g. land cover change *and* species extinction risk. It requires different expertise and increased resources. The RSPB advocates for separate reporting whilst highlighting the need for climate and nature reports to inform one another.

The RSPB is therefore supportive of businesses adopting the TNFD, recognising that while the TNFD alone won't drive the transformation needed for a nature-positive future, the actions it inspires can. The RSPB is committed to working with businesses to turn their commitments into impactful interventions, guided by robust nature strategies.

The RSPB appreciates that the TNFD framework is only one pathway for businesses starting to understand their nature-related information. It may not be the most suitable

³ [Business Investment in Nature | WWF](#)

for small to medium-sized organisations due to the level of resource required. Regardless of how a business operates, we believe that every organisation can benefit from understanding their nature-related interactions and setting out a plan that enables them to credibly minimise their negative impacts on nature, manage their dependencies and responsibly take action to increase their positive impact. There are many other networks, standards and certifications including B Corp, ISO14001, Green Dragon, the Better Business Standard and the recent ISO17298 (Biodiversity for organisations) which businesses may prefer to use.

The TNFD uses the LEAP (Locate, Evaluate, Assess and Prepare) steps to assist businesses with understanding their nature-related dependencies, impacts, risks and opportunities. This is beneficial for companies in having the necessary information to truly understand how their business is embedded within and interacts with nature. This allows companies to prepare adequately for any risks and to innovate in a way that aligns with nature. Disclosure of this information also allows investors and customers to make informed decisions on which companies they wish to interact with.

Choosing the right metrics is key to ensure robust reporting, monitoring and target setting. The RSPB's Conservation Science team has been developing guidance related to the Locate phase of the TNFD. Businesses should choose metrics related to both species and ecosystem integrity to ensure selection of the sites of greatest importance within their disclosure.

The RSPB understands that transparency is just the first step and that companies must be pushed to set ambitious, time-bound targets and action of how to reach said targets within thorough nature transition plans. Companies should use a scientific framework to set targets such as the IUCN RHINO guidance, which uses the Species, Threat Abatement and Restoration (STAR) metric ⁴and is also compatible with the LEAP framework. The STAR metric is a tool which measures potential reduction in species global extinction risk that could be achieved through conservation action and restoration. It disaggregates extinction risk into that caused by distinct pressures. STAR is most used to assess global extinction risk - it could be calculated for national extinction risk, but this would require considerable scientific resources and expertise.

⁴ The Species Threat Abatement and Restoration (STAR) metric is a science-based tool that measures the potential reduction in species global extinction risk that could be achieved through conservation action and restoration. STAR disaggregates extinction risk into that caused by distinct pressures, e.g. agriculture, pollution, allowing quantification of how much global species extinction risk could be lowered through particular actions taken at a particular site or collection of sites. STAR is a versatile metric which allows companies to identify where management of particular threats or restoration would bring the greatest extinction risk reduction. STAR is most commonly used to assess global extinction risk - it could be calculated for national extinction risk but this would require considerable scientific resources and expertise. At the global level, STAR is most useful in tropical and island regions which have higher concentrations of globally threatened species.

Businesses should also consider the sector-specific target setting guidance published by the TNFD and/or seek validation from the Science-based Targets Network (SBTN). The UNEP-WCMC published a [technical brief](#) which provides an overview of how biodiversity is included in existing and emerging corporate target setting approaches.

Government should also allocate appropriate levels of resource to monitoring progress to disclosed targets and to enforcement against corporate greenwashing.

UK Sustainability Reporting Standards (UKSRS)

The RSPB welcomes standardised sustainability reporting for businesses, emphasising the importance of reporting on nature-related information alongside climate.

The UK Sustainability Reporting Standards (UK SRS) are a forthcoming set of national guidelines designed to standardise how UK businesses disclose sustainability-related information. Based on the global IFRS Sustainability Disclosure Standards (ISSB's S1 and S2), UKSRS S1 and S2 aim to improve transparency, consistency, and comparability in reporting on environmental, social, and governance (ESG) matters. Initially voluntary, these standards are expected to become mandatory for economically significant entities, with implementation due in 2026.

In current drafts, companies can choose to report on nature under S1 if they deem it material to their business. The RSPB argues that nature is fundamental to the success of all businesses and should therefore always be reported on under UKSRS S1. The TNFD can be used as additional guidance or incorporated into the standard itself.

The ISSB is currently researching whether a third standard on Biodiversity and Ecosystem Services should be created. The RSPB supports the need for this standard and for nature to be prioritised alongside climate action. The RSPB applauds the continuation of this work and encourages the future UK Government endorsement of a nature-specific standard. The recent announcement that the ISSB and TNFD are converging work provides confidence that the existing knowledge and research from the TNFD will be embedded within this standard's development. Whilst this third standard is in development, corporates should begin collecting nature-related information and reporting on nature under UKSRS S1.

Increased transparency allows investors and customers to make informed decisions on the companies they wish to interact with. This is a critical step on the road to a nature positive economy. The RSPB also recognises the importance of interoperability between jurisdictions and existing standards, highlighting the continued need for collaboration with ISSB, GRI etc.

Information collected on nature should be used to inform both the climate and nature transition plans and vice-versa.

The RSPB calls for mandated disclosures on both nature and climate for large companies and for appropriate resource and support to be provided to enable SMEs to disclose. The UK Business Support Service acts as a centralised hub of government-backed guidance for SMEs. This could be expanded to make climate and nature advice more widely available.

The UK government have also been consulting on the requirements of a potential assurance scheme for those submitting corporate reporting on behalf of companies. The RSPB would like to highlight the need for separate accreditations for those submitting climate versus nature reports, due to the differing expertise required for each.

Transition planning

Transition plans are strategic roadmaps that outline how a company will adapt to align with their sustainability goals. The responsibility for such plans is typically held by senior executives and boards, and they are increasingly mandated for large UK companies and financial institutions under frameworks like the Taskforce Climate-related Financial Disclosures (TCFD). While climate transition plans focus on reducing greenhouse gas emissions and preparing for a low-carbon economy, nature strategies or nature transition plans address a company's impacts and dependencies on ecosystems and biodiversity. These plans aim to align with global goals like the Kunming-Montreal Global Biodiversity Framework and are often more complicated to create due to the wide range of biodiversity metrics available and a lack of comparability across regions, biomes and habitat types.

As with nature reporting, there are many frameworks and guidance documents available. For example, the TNFD recently published their final nature transition plan guidance ahead of COP30 and the '[Its Now for Nature](#)' publish minimum requirements for corporate nature strategies.

The RSPB welcomes increased uptake of corporate transition plans. Current UK Government draft requirements are focused on climate transition planning. The RSPB continues to advocate for the publication of separate nature and climate plans that inform one another. The RSPB already works in partnership with many committed businesses, helping them to understand and reduce their impacts on nature.

Investing in nature should also be a core part of climate transition plans due to the critical role ecosystems play as stores of carbon, in their ability to draw down additional carbon from the atmosphere, and in the multiple ways they can help humans adapt to increased warming and extreme weather events.

Corporates must also understand their nature-related dependencies, impacts, risks and opportunities with the same level of importance as climate. Nature is responsible

for providing us with oxygen, clean water, food, air and water pollution control, climate mitigation and adaptation among many other core functions and services.

Businesses thus exist within nature and are highly dependent upon it to succeed. Converting business strategies to consider people and planet as key stakeholders will create space for innovation that can provide immediate benefits and does not disadvantage future generations.

As stated above, investing in nature can offer both opportunities for mitigating against climate by restoring habitats that also sequester carbon and offering adaptation through nature-based solutions. This is a win-win for carbon, biodiversity and ecosystem services such as reducing flooding and flood defences.

The RSPB call for mandated publication of both climate and nature transition plans for large companies and appropriate resource and support to be provided to SMEs to assist with their planning. Research highlights a major credibility challenge: it found 80% of UK-listed companies have made net zero pledges but only 5% had published detailed, actionable transition plans to support them. The need for mandated transition plans is clear.

Legal frameworks

Thus far, the UK Government has consulted on “economically significant entities” reporting through frameworks outlined in the draft UKSRS, potentially including listed companies, large private companies and LLPs. Finalised versions of UK SRS S1 and S2 are expected for voluntary use in early 2026, after which the government and the FCA will decide if and when reporting becomes mandatory. Any mandatory UKSRS requirement is unlikely to differ across countries within the UK, though devolved nations may choose to add public sector or voluntary frameworks.

The RSPB understands the concerns regarding legal accountability of setting, and missing, targets within transition plans. The WWF report, *Disclose to Decarbonise: Policy Considerations when mandating transition plans*, offers the solution of expanding the existing Recklessness Standard to find an appropriate balance for legal risk.

The Recklessness Standard is an existing standard. It refers to a legal threshold where a company or individual is considered liable if they knowingly ignore a substantial risk that their actions—or inactions—could cause harm/inability to reach their targets. In the context of climate-related decision-making, applying this standard could help ensure that companies are held accountable if they fail to consider foreseeable risks in their strategies or disclosures. By embedding this standard into corporate governance or reporting frameworks, it could incentivise more robust climate transition planning and discourage greenwashing or superficial commitments.

Importantly, it would only apply where there is clear evidence of recklessness, not honest mistakes or evolving understanding. This creates a protective incentive for companies: by demonstrating reasonable care and due diligence in their climate strategies, they can reduce legal exposure while enhancing stakeholder trust and long-term resilience. The Recklessness Standard therefore allows companies to make forward-looking statements (e.g., net-zero targets, nature investment plans) without fear of liability if they are based on reasonable evidence.

There are also concerns around expertise and knowledge required to understand the complex sets of metrics for nature-related reporting. Government should ensure appropriate measures are put in place should consultancies be issuing disclosure and transition plans on behalf of companies, taking into consideration the differing expertise needed between climate and nature reports.

The RSPB calls on the UK Government to:

- Ensure that the UK Sustainability Reporting Requirements (UKSRS) require nature-related disclosures as well as those on climate
- Through the UKSRS, require businesses, of a certain size⁵, and financial institutions to publicly disclose their nature-related impacts, dependencies, risks and opportunities including both through their direct operations and also through their supply chains
- Require businesses, of a certain size, and financial institutions to publish a nature strategy alongside disclosures with time-bound, science-based targets, actions to minimise their negative impacts on nature, manage their nature-related dependencies appropriately and invest in contributing to a nature-positive future
- Require a climate transition plan to also be published, with specific consideration of nature-based solutions for climate adaptation and resilience
- Provide appropriate levels of resource and support to SMEs wishing to understand and disclose nature-related information and produce nature transition plans. The UK's 'Business Support Service' could be expanded to make climate and nature advice more widely available for SMEs

⁵ It is expected that the TNFD will apply to organisations of the same criteria as the TCFD: large companies, including UK-registered companies with over 500 employees, those listed on the AIM with over 500 employees, companies with over £500m turnover, large LLPs with similar criteria, pension schemes with assets of £1bn or more, and certain financial institutions and pension funds. The RSPB would support many this requirement alongside supporting SMEs to understand and disclose their impacts – perhaps with a less specific set of standards / frameworks.

- Mandate businesses to regularly report on their progress against set targets. Allocate appropriate level of government resource to monitor whether they have achieved targets
- Ensure that targets and statements have legal backing, using WWF's suggestion⁶ of applying the existing 'recklessness standard' to transition plan reporting. This can provide protection for genuine (and ambitious) transition plan reporting, whilst ensuring entities are held liable for concealing information or recklessly publishing false information. This should ensure the right balance between avoiding encouragement of greenhushing or greenwashing
- Ensure a single, appropriate and independent accreditation scheme is set up for consultants wishing to submit disclosures on behalf of businesses. This is to guarantee appropriate metrics are used resulting in robust analysis of impact and dependencies
- Support the call for ISSB Biodiversity & Ecosystem Standard to continue to be developed, recognising the differences in expertise required to report on nature/climate, and the further importance of location in nature reporting. In due course, adopt a nature-related standard into the UKSRS
- At a sector level, provide further guidance through the co-development of 'Nature Positive Transition Pathways' together with industry, as per the WWF & GFI [recent call](#).

The RSPB calls on businesses to:

- **Understand the role nature has in your business.** Use the published guidance from TNFD and the LEAP approach, the UK Business and Biodiversity Forum (UKBBF), and/or the knowledge of your own teams and supply chains (both upstream and downstream) to determine your nature-related impacts, dependencies, risks and opportunities, and those in your key supply chains and partners
- **Ahead of any mandated UKSRS, voluntarily disclose your Nature-related interactions.** Publish your nature-related findings following the principles and guidance of the independent standard setters and certification bodies most appropriate to you. Nature and climate are deeply related and so you should ensure cross-pollination between your reports
- **Embed nature into BAU decision-making.** Draw out the biggest areas of vulnerability and opportunity for your business and build this into your strategic planning and decision making at the overall business level.

⁶ <https://www.wwf.org.uk/sites/default/files/2024-12/disclose-to-decarbonise.pdf>

- **Set science-based targets for nature.** Use a scientific framework such as IUCN RHINO, the TNFD sector-specific guidance or through seeking validating from the SBTN. Review the UNEP-WCMC [technical brief](#) for information on which scientific guidance may be most suitable.
- **Create and publish a detailed nature transition plan.** Use your new nature-related understanding to build a strategy which enables you to hit your nature and climate targets, take positive action for nature, and further your support for the nature positive movement. Business for Nature and the UKBBF have detailed guides for writing and communicating your nature and climate strategy. [RSPB 5 pillars](#) can also be used as guidance to develop a nature strategy
- **Act for nature with urgency.** Nature reporting guidance may be in its infancy compared with climate reporting but action cannot wait. Nature is in crisis and the RSPB urges every business to take timely and significant actions. Partner with expert organisations like the RSPB who can deliver nature restoration at scale. Record and report your actions and learnings to inform the next step of your nature and climate strategy
- **Support one another and share best practice/**Join forums and support other like-minded businesses through peer-to-peer learning

The RSPB calls on the TNFD and ISSB to:

- Continue to build upon the evidence and narrative that nature is essential for business success and that businesses must embed nature-related data into their decision-making processes
- Work collaboratively with the UK government to ensure nature is included within the UKSRS
- Ensure businesses signing up to TNFD always use double materiality as a reporting measure, reporting on both *dependencies and impacts* on nature in equal weighting
- Strongly encourage the submission and publication of nature transition strategies, including guidance for measuring ongoing progress
- Ensure ambitious targets and genuine action by putting steps in place to ensure TNFD cannot be used as a tool for greenwashing by entities signing up to TNFD. [Research](#) has shown that many large companies are now making biodiversity commitments. However, when analysed, targets lacked enough clarity for progress to be monitored and therefore for genuine accountability. Stringent requirements for target-setting and monitoring through the TNFD could improve this
- Recommend metrics and indications which are robust, clear and, where possible, standardised. The RSPB's Conservation Science team are continuing

to investigate how to choose which metrics to use, to report on the 'State of Nature'. Standardised metrics allow potential investors, partners and customers to compare more easily, taking into account any appropriate changes for sector and biome

- Continue to work in partnership with other standard setters and collaborate with governments, eNGOs and industry stakeholders to ensure interoperability
- Ensure local communities and, where appropriate, indigenous communities are involved in any plans for nature within their areas, valuing the insight and knowledge they bring

These recommended actions to government, business and ISSB/TNFD would result in the appropriate foundations for UK businesses to scale nature-related reporting, transition planning and action taking.