

**From**

Lakshmi Kripa Meiyappan, Singapore  
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To

**TNFD**

SUB: Feedback shared on TNFD framework Version 0.4 Beta release

Thank you and congratulations for the release of version 0.4 Beta for TNFD. Appreciate the opportunity to share comments and feedback. Enclosing my feedback at the end of this letter. To summarize the feedback

1. Recommending a pivot from a risk- based framework to an opportunity-based framework to **gain** acceptance, adoption, and championship.
2. Suggesting **extensive leverage of AI** to simplify, restructure, tighten, remove duplication, incorporate feedback, and create high impact training materials.
3. Kindly **innovate** the approach of the framework to focus only and only on nature restoration and regeneration.
4. Kindly engage my support to strategize transition from current format to an actionable and practical format.
5. I have good skills and experience to unlock the **exceptional value** and **create accelerated impact** of this worthy initiative.

Please access my linked in profile ([Lakshmi Kripa Meiyappan | LinkedIn](#)) for further insights. Looking forward to being part of your team and helping propel the framework to astounding outcomes.

Regards

Lakshmi Kripa Meiyappan  
+6593837219  
LSKRIPA@hotmail.com

*See page 2 onwards for feedback submitted.*

## Piloting the framework

Are you pilot testing the TNFD Framework?

- Yes
- No
- Exploring the possibility

## What are strengths of the beta framework that you think should be retained?

1. The stated focus on Opportunity Management and Disclosure Framework
2. The alignment with Ecosystem and Biodiversity protection, restoration, and regeneration. Sustainable use of natural resources, Reputational capital opportunity

## How could we improve the TNFD framework?

1. Simplify for adoption. Consider cost and effort of implementation. Use AI wherever feasible.
2. Reference to Annex 4.3 Disclosure Metrics, A3: Response disclosure metrics- remove credits.
3. Many other improvements are recommended. please consider strategy shared in Approach to specific guidance from 'How could we improve the TNFD approach to specific guidance' to 'What other recommendations / learnings / insights do you have for TNFD? '

## How could we improve the TNFD Understanding Nature component?

1. Simply / re structure to achieve speedy adoption - alignment, adaptability, prompt action, increase disclosure ambition.
2. Remove duplicate content, repeated verbiage, similar material expressed in diverse ways
3. Focus on Biodiversity protection rather than next steps such as 'action plan to create an internal database to collect location data to link other internal systems to combine location data from disparate assets with minimal effort' (ref source ex case study). The opportunity from nature restoration pivoted to perfection in location data. Objective lost.
4. Pre-populate data and MIS where-ever possible

## How could we improve the TNFD Draft Disclosure Recommendations?

Reduce/optimize number of tools used. Case Study Source ex used 10+ tools. Likely to overwhelm organizations seeking opportunities for disclosure to improve profit and purpose to restore nature.

Source ex used 10+ tools, what would it take to use 1 tool only. If source ex needed 6 months for locate phase, what would it take to optimize to 2 weeks,

1. ENCORE for interface with nature.
2. TRASE to narrow down possible origin of specific commodities.
3. WWF Biodiversity Risk Filter for impact dependencies.
4. SBTN list for impact dependencies.
5. WWF – Water Risk Filter for water stress.
6. Aqueduct (WRI) for water stress.
7. Integrated Biodiversity Assessment Tool (IBAT) for BioD importance.
8. Global Forest Watch/Water Stress (WRI) for eco system integrity.
9. TNFD criteria for priority locations for assessment of twenty-three priority locations.
10. Company ratings not limited to NEC, Impact Institute, MSCI, NaturRisk

### **How could we improve the TNFD Leap Approach?**

1. Simply, optimize, improve cost/time/efficiency.
2. pre- populate data with AI
3. Remove dependency on PWC
4. Focus on opportunity not risk
5. Focus only and only on sustainable use of natural resources and disclosures of impact in a fresh innovative way of approaching a framework to excite and engage corporates.

### **How could we improve the TNFD draft approach to metrics and targets?**

1. Focus on the unique uncovered value the TNFD brings. Example. ' Approach for A5 Disclosure metrics for the tropical forest biome' is concise, crisp, and has unique value that TNFD generates.
2. Metrics Annex 1: Dependency and impact disclosure metrics, A2: Risk and opportunity disclosure metrics, A3: Response disclosure metrics, A4: Disclosure metrics for the agriculture and food sector is complicated with Cross-sector indicator/ source. please include me in this sub work group, I can help innovate a more efficient way of synergies with other standards and frameworks. Also consider endorsement of accuracies from the cross-referenced standards and frameworks.

### **How could we improve the TNFD approach to specific guidance?**

1. Please share excel format of all main sections and subsections for structured feedback process. Current feedback form may not be effective or efficient.
2. Kindly publish pilot feedback to improve feedback
3. Please email me at [LSKRIPA@hotmail.com](mailto:LSKRIPA@hotmail.com). I volunteer to join your team to assess feedback and be part of Launch 1.0 via optimization strategy to focus on Nature (currently focus has got slightly complex by a risk-based approach)

### **What additional guidance would be valuable to you?**

1. Consider arranging funding and resources for this process for companies.
2. Consider arranging grants to cover opportunity costs for adoption
3. Enhance the case study repository and engage a very innovative trainer to accomplish alignment in 2-3 weeks.

### **What other recommendations / learnings / insights do you have for TNFD?**

1. Kindly email this form to me with inline responses for each of the 16-feedback shared
2. Please consider my suggestion to include my volunteer work to help release 1.0
3. Please provide access to work draft and pilot observations
4. Kindly include me in discussions, work groups, presentations, meetings, and webinars.