

Dr. Hassan Aftab Sheikh
Career Development Fellow in Nature Finance
Oxford Sustainable Finance Group
University of Oxford
Wellington Square, Oxford OX1 2JD

30 September 2026

Dear Dr. Sheikh,

Decision-Useful Nature Metrics Workshop

The Chartered Governance Institute is the professional body for governance and the qualifying and membership body for governance professionals across all sectors. Its purpose under Royal Charter is to lead effective governance and efficient administration of commerce, industry, and public affairs working with regulators and policymakers to champion high standards of governance and providing qualifications, training, and guidance. As a lifelong learning partner, the Chartered Governance Institute helps governance professionals achieve their professional goals, providing recognition, community, and the voice of its membership.

One of nine divisions of the global Chartered Governance Institute, which was established 135 years ago, The Chartered Governance Institute UK & Ireland (the Institute) represents members working and studying in the UK and Ireland and many other countries and regions including the Caribbean, parts of Africa and the Middle East.

As the leading professional body that qualifies Chartered Secretaries and Chartered Governance Professionals, our members increasingly encounter nature-related issues through corporate reporting, sustainability disclosures, risk management, stakeholder engagement, and board oversight. They are therefore well placed to understand the governance, reporting, and decision-making considerations raised by this enquiry, and we look forward to exploring these and contributing further during the upcoming research workshop on 8 October 2026.

Response to the questions

Question 1: How, if at all, do you currently use nature-related metrics in your role?

The Institute does not currently use nature-related metrics directly. However, our members increasingly engage with them through corporate reporting, sustainability disclosures, board reporting, risk management, and governance oversight.

From our perspective, the key questions are not only how nature-related metrics are measured, but how they are governed, interpreted, assured, and used in practice. Given wider discussions around corporate reporting reform,

reporting burden, and disclosure effectiveness, we are especially interested in understanding which metrics support oversight for boards, investors, and other stakeholders.

Further, governance professionals increasingly operate within a crowded reporting environment, and they are often responsible for translating complex reporting requirements into information that boards can effectively oversee and scrutinise. One challenge is ensuring that nature-related information remains visible and actionable rather than becoming lost amongst growing volumes of corporate disclosure.

Are there particular nature-related metrics or types of metrics that you find especially useful? If so, which ones and why?

The Institute does not currently have a formal position on which nature-related metrics provide the most meaningful representation of ecological conditions or pressures. As a professional body, our members would want to understand how metrics are used within governance, risk management, and reporting processes rather than in the technical design of individual environmental measures. Particularly useful metrics may be those that capture both an organisation's impacts on nature and its dependencies on ecosystem services. Understanding nature-related dependencies may provide boards with a clearer view of operational resilience, supply chain vulnerability and long-term business continuity.

The Institute would be especially keen to understand which metrics have demonstrated value in practice through improving decision-making, informing board oversight, supporting accountability, and helping organisations manage material nature-related risks and dependencies. For us, the key question is often not which metric is theoretically best, but which metrics are sufficiently robust, understandable, and practical to influence real-world outcomes.

In your view, what makes a nature-related metric useful for business or financial decision-making?

From a governance perspective, useful nature-related metrics would support decision-making throughout the management and board structure rather than just burdening any reporting functions of the business. It should be material, measurable, comparable over time, and clearly linked to business risks, opportunities, strategy, and long-term value creation. The most useful metrics enable boards and management to assess performance, monitor accountability, and influence resource allocation on all forms of risks and dependencies – without imposing disproportionate reporting or administrative costs that are also disconnected from improving governance outcomes. However, the Institute also recognises that nature-related risks differ from many other sustainability issues because they are often highly location-specific. Metrics that enable organisations to identify and monitor nature dependencies, impacts, risks and opportunities at priority locations are likely to be particularly valuable, provided the outputs can still be communicated to boards in a clear and decision-useful manner.

In your view, what makes a nature-related metric NOT useful for business or financial decision-making?

A nature-related metric is not useful when it creates reporting effort without improving decision-making. A common challenge facing many UK organisations is the sheer abundance of reporting frameworks and regulatory obligations. The UK government's recent focus on reducing regulatory and reporting burdens, alongside debates arising from the Modernising Corporate Reporting consultation from the Department of Business, Science, Innovation and Trade, highlights the importance of distinguishing between disclosures that support governance outcomes and those that add complexity without clear value.



From a governance perspective, a metric also becomes less useful when it is poorly linked to business strategy, risk, capital allocation, or organisational accountability. Boards and decision-makers need **better** information, not just **more** information. The Chartered Governance Institute UK & Ireland's *Effective Board Reporting* report (2026) found that organisations spend an average of £2.8 million producing their annual reports, which highlights the importance of ensuring that any additional disclosure requirements generate information that is legitimately useful for decision-making and accountability. Against that backdrop, any new metric should justify the additional reporting burden by generating insights that management, boards, investors, or other stakeholders can practically use.

There is also an important distinction between voluntary leadership frameworks and regulatory requirements. A sophisticated, granular nature-related metric may be highly valuable for organisations seeking to lead on sustainability and demonstrate advanced stewardship of natural capital. However, if the intention is widespread regulatory adoption, the metric must be proportionate, cost-effective, and capable of being applied consistently across organisations with differing levels of expertise, resources, and exposure to nature-related issues.

In short, a nature-related metric is unlikely to be useful if the data is expensive to collect, difficult to interpret, inconsistent across organisations, disconnected from business decisions, or unable to influence either management action or board oversight. The most problematic metrics are those that create reporting activity without creating decision-useful information.

In your view, what makes a metric a meaningful and reliable representation of nature?

As a governance-focused organisation, the Institute views this question primarily through the lens of decision-making and oversight rather than ecological measurement. The most useful metrics are likely to balance scientific credibility with practical applicability, enabling organisations to collect, understand, and act on the information consistently.

Are you aware of any nature metrics that you believe provide a particularly meaningful representation of ecological conditions or pressures? If so, which metrics and why?

Rather than favouring any specific metric, the Institute is interested in metrics that have demonstrated practical value in governance and decision-making contexts. Which metrics have demonstrated value in practice through improving decision-making, informing board oversight, supporting accountability, and helping organisations manage material nature-related risks and dependencies? The Institute would welcome a discussion on are sufficiently robust, understandable, and practical to influence real-world decisions.

What are your biggest questions or concerns about the current use of nature-related metrics?

The Institute's biggest concern is that the conversation around nature-related metrics is often focused on what can be measured rather than what decisions need to be made. From a governance perspective, the purpose of a metric should be to improve oversight, risk management, resource allocation, and strategic decision-making. There is a risk that organisations become increasingly sophisticated at measurement while remaining unclear about how those measurements influence actions.

The Institute is also concerned about metric proliferation. Organisations already face a crowded reporting landscape, and boards are having to navigate multiple sustainability frameworks, standards, and disclosure expectations. Without greater convergence, there is a risk of creating reporting burden without a corresponding increase in decision-useful information. This is both topically and principally relevant in the UK, where the



Modernising Corporate Reporting consultation and broader government discussions have highlighted concerns about the cumulative cost and complexity of corporate reporting requirements. While concerns about fragmentation remain, the Institute welcomes efforts to improve alignment between nature-related reporting initiatives and emerging sustainability reporting standards. Greater interoperability between voluntary frameworks and potential future reporting requirements would help reduce unnecessary duplication, improve comparability and support more efficient board oversight.

Another concern is comparability. Nature-related issues are highly location-specific and context-dependent, which makes standardisation difficult. A metric that is highly meaningful for one organisation, sector, or geography may be of limited relevance to another. Universal metrics inevitably involve trade-offs – there is a real risk that efforts to create universal metrics either oversimplify ecological realities or result in measures that are too complex for widespread adoption.

The Institute is also interested in the tension between scientific accuracy and practical implementation. The most ecologically robust metrics are not always the easiest for businesses to collect, understand, assure, or incorporate into governance processes. If reporting becomes excessively technical, boards may struggle to challenge or scrutinise the information effectively. The Institute is also interested in the maturity and assurance-readiness of nature-related data. Boards increasingly rely on independently assured information for strategic and risk-management decisions. Where metrics depend on modelling, estimation, geospatial analysis or third-party datasets, organisations need clarity regarding data quality, transparency of methodology and appropriate assurance standards.

Finally, the Institute thinks there needs to be greater clarity about the intended audience and purpose of nature-related metrics, because regulatory metrics and voluntary leadership metrics serve different purposes (and accordingly, are also governed differently). If they are designed for voluntary adoption by organisations seeking to demonstrate leadership, more sophisticated and nuanced approaches may be entirely appropriate. If they are intended to form part of regulatory requirements, however, they must be proportionate, scalable, understandable, and capable of being implemented consistently across a wide range of organisations. Too often these two objectives are discussed as though they are the same, when they may require very different metrics and reporting approaches.

Ultimately, the predominant issue is not whether we can develop more nature-related metrics, but whether we can develop metrics that genuinely improve governance and decision-making while remaining proportionate to the costs of collecting, reporting, and assuring them. The key test should be whether a metric changes decisions, not just whether it measures something.

Are there any particular topics, challenges, metrics, or examples you would like the October 8 workshop to address?

The Institute would be keen to explore the following elements:

- Decision-usefulness: How can organisations determine whether a nature-related metric is genuinely influencing business decisions, rather than only adding to reporting and disclosure requirements?
- Regulatory versus voluntary reporting: Should we be designing different metrics for organisations seeking to be sustainability leaders versus metrics that could realistically be adopted into regulation or mainstream reporting frameworks?



- Board and management use: What examples exist of boards changing strategy, risk appetite, investment decisions, or resource allocation because of nature-related metrics?
- Proportionality and reporting burden: How should organisations balance the value of additional nature-related information against the costs of collecting, assuring, and reporting it? This is particularly relevant given ongoing debates around corporate reporting reform and efforts to reduce unnecessary reporting complexity.
- Evidence of impact: Which nature-related metrics have demonstrably changed organisational behaviour, investment decisions, risk management approaches, or governance practices?
- Materiality: How can organisations determine whether a nature-related issue is sufficiently material to warrant board-level attention and disclosure? The Institute is especially interested in how organisations determine whether nature-related issues are sufficiently material to warrant board attention, strategic intervention, and external reporting.
- Comparability versus context: Nature-related risks are often highly localised. How can metrics remain comparable across organisations without losing the context that makes them meaningful?
- Assurance and reliability: What level of evidence, verification, or assurance should be expected before nature-related metrics are relied upon for investment, governance, or regulatory decisions?

Is there anything else you would like us to know before the workshop?

In summary, a key question for the Institute is how nature-related metrics transition from measurement to governance. We are keen to understand not only what should be measured, but how boards and management teams can use that information to improve oversight, strategy, risk management, and organisational performance.

We would also encourage discussion around the distinction between metrics designed for sustainability-leading organisations and those that could realistically support wider regulatory adoption. The characteristics required for each may differ significantly.

More broadly, we believe the key challenge is ensuring that nature-related metrics generate genuinely decision-useful information. In an environment where organisations are increasingly conscious of reporting costs and complexity, the most successful metrics are likely to be those that improve decisions and accountability, rather than simply increasing disclosure.

Should you wish to discuss any of the above comments in further detail, we welcome you to contact our Policy Department at policy@cgi.org.uk.

Yours faithfully,



Kayla Schembri
Head of Policy

The Chartered Governance Institute UK and Ireland

