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03 September 2026

Dear Sir/Madam,

Business Eswatini Submission on the NBSAP 3.0

Please find attached Business Eswatini's formal submission on the final validation and approval draft of the Kingdom of Eswatini National Biodiversity Strategy and Action Plan 3.0.

We appreciate the opportunity to contribute to this important process. Business Eswatini supports an ambitious, credible and implementable strategy that advances biodiversity conservation while taking due account of implementation capacity, investment certainty, competitiveness and existing regulatory systems.

Our submission identifies areas where the final text could be strengthened through clear legal sequencing, proportionate business-facing requirements, recognition of existing compliance systems, and structured public-private collaboration.

Business Eswatini remains available to engage in further technical discussions with the Ministry of Tourism and Environmental Affairs, the Eswatini National Trust Commission and other relevant stakeholders as the strategy is finalised and implemented.

Yours Faithfully,

Musa Maseko
Head: Trade and Commerce

FORMAL STAKEHOLDER SUBMISSION

Comments on the Kingdom of Eswatini National Biodiversity Strategy and Action Plan 3.0, 2026–2035

Submitted to: Ministry of Tourism and Environmental Affairs and Eswatini National Trust Commission
Document reviewed: Final validation and approval draft, August 2026, read together with approved NDC 3.0
Date: 3 September 2026

1. Purpose and overall position

Business Eswatini (BE) welcomes the opportunity to comment on the final validation and approval draft of NBSAP 3.0. BE recognises that biodiversity, water security, climate resilience and productive landscapes are fundamental to Eswatini's long-term economic competitiveness and the continuity of private investment. The private sector has an important role in reducing material biodiversity impacts, improving sustainable production, supporting restoration and mobilising investment.

BE's support is accompanied by a request for greater implementation certainty. Several provisions, particularly those concerning disclosure, spatial controls, private-sector financing, subsidy reform and institutional arrangements, read as business obligations without fully defining their legal authority, scope, cost, transition pathway or relationship with existing regulatory systems. Strategic commitments should not become de facto regulatory requirements without enabling law, regulatory impact assessment and structured consultation.

The approved NDC 3.0 is Eswatini's authoritative national climate-policy commitment for matters within its scope. The NBSAP should operate as a complementary biodiversity strategy and should not introduce conflicting definitions, reporting channels, finance expectations, baselines or governance structures. This requirement for policy coherence does not, by itself, establish a hierarchy between instruments or displace applicable legislation.

The recommendations below are intended to strengthen implementation, protect legitimate conservation outcomes and reduce the risk of duplication, unintended costs, investment uncertainty or inconsistent enforcement.

2. Priority amendments requested

Issue	Requested safeguard
Legal sequencing	State that the NBSAP does not itself create enforceable corporate duties; future mandatory measures require enabling law, regulatory impact assessment, consultation and transition periods.
Proportionality and SMEs	Replace blanket references to 'all companies' with thresholds based on size, sector, value-chain exposure and material impact; exempt micro and small firms from standalone reporting.

Issue	Requested safeguard
Existing compliance systems	Use existing EEA and sector reporting channels and recognise equivalent third-party certification evidence, including FSC where relevant, to prevent duplicate reporting.
Commercial data	Protect confidential business information, intellectual property and sensitive spatial or supply-chain data; define verification, correction, access and publication rules.
Private co-financing	Separate statutory compliance from voluntary co-financing and credit verified in-kind expenditure so businesses are not required to fund the same biodiversity outcome twice.
Forestry definitions	Clarify that approved commercial plantation harvesting followed by timely re-establishment is not forest loss, while retaining safeguards for natural ecosystems, riparian areas and invasive spread.
Spatial planning and OECMs	Protect existing lawful rights through site-specific assessment, consultation, transition, appeal and appropriate compensation or negotiated remedies where new restrictions materially curtail productive use.
Subsidy reform	Require transparent methodology, sector validation and economic, social and environmental impact assessment before incentives are withdrawn or materially redesigned.
Institutional architecture	Clarify mandates and decision rights and provide formal organised-business representation on the NBC and relevant technical structures.
Policy coherence and NDC 3.0	Require explicit consistency and interoperability with the approved NDC 3.0, supported by a cross-government matrix covering investment, trade, industrialisation, climate, forestry, water, land, energy, agriculture, SMEs and competition.
Incentives and transition	Match new business obligations with finance, tax, procurement, technical-assistance, certification and SME transition measures.
Innovative finance	Establish legal, property-right, valuation, verification and double-counting safeguards before offsets, PES, credits, bonds or blended-finance mechanisms are implemented.
ABS reporting	Limit ABS reporting to entities whose activities actually involve relevant genetic resources, digital sequence information or associated traditional knowledge.

3. Detailed comments and proposed drafting

3.1 Legal status, regulatory sequencing and impact assessment

Relevant provisions: Targets 14 and 15; implementation and monitoring provisions throughout the draft; approved NDC 3.0, sections 5.2 and 5.3.

Material concern: Target 15 uses mandatory language, but the draft does not identify the existing statutory basis or the legislative and regulatory process through which the duties would become enforceable. Similar uncertainty arises where biodiversity mainstreaming could become a new approval or reporting layer. NDC 3.0 itself records that climate data collection and reporting remain fragmented and largely voluntary, and links a stronger national MRV system to an appropriate legal mandate. Creating a separate NBSAP route before that framework is settled would increase legal and investment uncertainty.

BE recommendation: The final NBSAP should distinguish existing statutory duties, future regulatory proposals and voluntary commitments. Any new business-facing requirement should follow an appropriate legal instrument, regulatory impact assessment (RIA), consultation, published guidance, institutional readiness assessment and a reasonable transition period. Biodiversity reporting that also supports NDC implementation should enter through one coordinated, legally authorised framework.

> **Requested wording:** Nothing in this Strategy, by itself, creates an immediately enforceable corporate duty beyond obligations established in existing law. Any new mandatory business disclosure, financing, product-information or biodiversity-management requirement shall be introduced through appropriate enabling legislation or regulations, supported by regulatory impact assessment, stakeholder consultation, clear institutional responsibility, published guidance and reasonable transition arrangements. Any biodiversity-related business reporting introduced to support NDC 3.0, the NBSAP or national MRV arrangements shall be implemented through a single coordinated framework, under clear legal authority and published protocols. It shall not create duplicate corporate reporting channels or require public disclosure of confidential information beyond what is necessary, proportionate and authorised by law.

3.2 Proportionality, materiality and protection of SMEs

Relevant provisions: Target 15.1-15.3 and the caution in Cluster IV against complex reporting for small enterprises.

Material concern: Targets 15.2 and 15.3 apply to 'all companies', notwithstanding the draft's own recognition that complex reporting should not be imposed on small enterprises. Most SMEs do not issue annual sustainability reports, and many have limited or immaterial biodiversity exposure. Blanket requirements would impose costs disproportionate to environmental risk.

BE recommendation: Adopt risk-, size-, sector- and materiality-based thresholds; pilot requirements in high-impact sectors; and use simplified information channels where SME data is genuinely needed.

> **Requested wording:** Business disclosure requirements shall be proportionate to company size, sector, value-chain exposure and material biodiversity risk or impact. Micro and small enterprises shall not be required to prepare standalone biodiversity or sustainability reports. Where information is necessary, it shall be collected through simplified existing sectoral or regulatory systems, supported by standard templates, capacity-building and phased implementation.

3.3 Avoiding duplicate disclosure and recognising existing compliance systems

Relevant provisions: Targets 14 and 15; section 9.5 on forestry mainstreaming; sections 11.10-11.11 on private-sector and landscape finance; monitoring provisions proposing a corporate disclosure register; approved NDC 3.0, sections 4.6 and 5.3.

Material concern: The draft contemplates biodiversity disclosure, consumer information, ABS reporting, EIA follow-up, finance reporting and national dashboards without demonstrating how these will interact with existing EEA, sector-regulator and company reporting. NDC 3.0 seeks to facilitate corporate climate-risk and opportunity disclosure while acknowledging fragmented national data systems. In commercial forestry, EIA compliance and international certification systems such as the Forest Stewardship Council (FSC) already require extensive ecological monitoring and management evidence. Parallel NBSAP, NDC and sector submissions would add cost without necessarily improving outcomes.

BE recommendation: Create one harmonised, interoperable reporting channel, apply a 'collect once, use many times' principle and formally recognise evidence submitted under equivalent statutory or credible third-party systems. Recognition should be based on a transparent equivalence or gap assessment and should not displace statutory oversight where certification coverage is incomplete.

> **Requested wording:** Corporate biodiversity reporting shall use existing statutory reporting channels wherever practicable and shall avoid duplicate submission of information already provided through environmental approvals, compliance reports, annual reporting or sector regulation. Where an accredited third-party certification system, including FSC certification in the forestry sector, demonstrably covers an equivalent requirement, the competent authority may recognise it as deemed or equivalent compliance for the overlapping requirement, subject to a published equivalence assessment and any limited gap-filling information that remains necessary. Where biodiversity information is also required for NDC 3.0 or national MRV, it shall be collected once and reused across authorised systems under common definitions, data governance and confidentiality rules.

3.4 Commercial confidentiality, intellectual property and data governance

Relevant provisions: Target 15 and the proposed corporate biodiversity disclosure register and national dashboards in the monitoring framework.

Material concern: Corporate submissions may contain sensitive supply-chain information, sourcing locations, production methods, security-sensitive spatial data, planned investments, genetic-resource use or intellectual property. The draft does not translate general confidentiality principles into a specific corporate data-governance regime.

BE recommendation: Differentiate confidential regulatory reporting from public disclosure and specify data ownership, purpose limitation, authorised access, retention, verification, correction, appeal and publication rules.

> **Requested wording:** The corporate disclosure framework shall protect commercially sensitive information, intellectual property and security-sensitive spatial or supply-chain information. Information supplied confidentially to a regulator shall not automatically be published in a dashboard or register. The framework shall define data ownership, authorised access, retention periods, verification procedures, correction rights, appeal mechanisms and the criteria governing public disclosure.

3.5 Private-sector co-financing, in-kind contributions and double-funding

Relevant provisions: Target 19; section 11.10 (Private sector and business accountability); section 11.11 (Community-level and landscape financing); approved NDC 3.0, section 5.2.1 (Finance).

Material concern: The strategy appropriately states that private finance should complement rather than replace public responsibility. However, its co-financing language could evolve into an unpredictable expectation that companies fund catchment-wide invasive alien species control, riparian restoration or other public conservation functions in addition to meeting existing licence and operational obligations. NDC 3.0 also seeks substantial public and private resource mobilisation and proposes green-finance, carbon-market and payment-for-ecosystem-services mechanisms. Without common attribution rules, the same company expenditure could be counted toward national targets and still attract a further co-financing request. Forestry operators already incur substantial expenditure on invasive species management, ecological buffers and catchment protection within operational landscapes.

BE recommendation: Separate statutory remediation, approval conditions and voluntary partnership finance. Introduce a transparent system for crediting verified cash and in-kind contributions toward agreed co-financing expectations, with common attribution rules across NDC, biodiversity, water and corporate reporting that prevent double counting by both government and companies.

> **Requested wording:** Private-sector co-financing shall remain voluntary unless established through separate legislation or an explicit condition of approval. Verified business expenditure and in-kind contributions that deliver agreed biodiversity outcomes, including invasive alien species control, riparian protection, ecological monitoring, restoration maintenance and catchment stewardship, shall be recognised and credited toward any national or landscape co-financing framework. Private-sector contributions recognised under NDC 3.0 climate-finance mobilisation, biodiversity finance, PES, carbon-market or green-finance arrangements shall be subject to common attribution and double-counting rules. No entity shall be required to finance the same outcome twice.

3.6 Forestry definitions: zero net forest loss and commercial plantation cycles

Relevant provisions: Target 8.2; Target 10.2; section 9.5 (Mainstreaming into forestry, woodlands and landscape management); approved NDC 3.0, sections 3.1.8, 4.6 and ICTU section 6.

Material concern: Target 8.2 is expressed as reducing forest loss to cropland to zero, while Target 10.2 requires sustainable forest management. The draft does not expressly distinguish permanent forest conversion from routine clear-felling and replanting within an approved commercial plantation rotation. NDC 3.0 recognises forests and timber plantations within national removals accounting and anticipates improved plot-level data from plantation companies and accounting for harvested wood products. Without common definitions and baselines, temporary canopy changes during lawful rotations could be misclassified under the NBSAP or reported inconsistently across biodiversity and climate systems, affecting timber supply, investment planning and wood security.

BE recommendation: Add a definition that protects normal, approved commercial rotation and re-establishment, while preserving safeguards for natural ecosystems, indigenous forests, riparian zones, high-value grasslands, corridors, invasive spread and unlawful land conversion. Align the definition, data and baselines with NDC 3.0, applicable IPCC methods and Eswatini's forest-reference and GHG-accounting arrangements.

> **Requested wording:** For purposes of Target 8.2, 'forest loss' means the permanent conversion of natural or planted forest land to another land use or a long-term failure to maintain the applicable forest land-use classification. Normal harvesting within a lawfully established commercial plantation rotation, followed by timely replanting or regeneration in accordance with approved management plans and environmental conditions, shall not constitute forest loss or ecosystem degradation. This clarification does not exempt conversion of natural ecosystems to plantations, failure to re-establish harvested areas, unlawful clearing, damage to indigenous forest or riparian areas, or the uncontrolled spread of invasive plantation species. This definition shall be applied consistently with NDC 3.0, national forest-reference and GHG-accounting methodologies, including lawful reporting of forest carbon-stock changes and harvested wood products, and shall not create a separate or conflicting definition of forest loss for biodiversity, climate or forestry reporting.

3.7 Spatial planning, OECMs, existing rights and investment certainty

Relevant provisions: Targets 1 and 3, including critical biodiversity areas, ecological corridors, protected-area buffers and OECM candidate areas; approved NDC 3.0, sections 3.1.8 and 4.6.

Material concern: The draft usefully states that priority spatial layers do not automatically create restrictions or conservation designations. This principle should be converted into an operational safeguard. NDC 3.0 also commits Eswatini to establish at least three OECMs and to conserve and restore substantial areas by 2035. If NBSAP or NDC spatial commitments are implemented without clear boundaries and due process, they could strand existing capital, restrict future investment and disproportionately affect SME forestry and agricultural outgrower schemes that cannot readily absorb productive land exclusions.

BE recommendation: Require site-specific ecological and socio-economic assessment, consultation, statutory adoption, transition arrangements, appeal procedures and negotiated conservation tools before new restrictions affect lawful land use. Apply the same safeguards when implementing NDC OECM, restoration and connectivity commitments. Where public conservation decisions materially curtail legally acquired productive rights, provide compensation, incentives, land-management agreements or other lawful economic remedies.

> **Requested wording:** Biodiversity maps, corridors, buffers and OECM candidate areas are planning inputs and shall not, without due legal process, extinguish or materially curtail existing lawful land-use or investment rights. Before a new restriction is applied, the responsible authority shall undertake site-specific ecological and socio-economic assessment, consult affected owners and users, consider voluntary, incentive-based and avoidance options, and provide transition and appeal procedures. Implementation of NDC 3.0 commitments on OECMs, restoration and ecosystem connectivity shall be subject to the same safeguards. Where legally acquired rights or productive capacity are materially curtailed for a public conservation purpose, compensation or another negotiated economic remedy shall be provided in accordance with applicable law.

3.8 Harmful-subsidy reform and competitiveness

Relevant provisions: Target 18 and the Biodiversity Finance Action Plan and harmful-subsidy analysis.

Material concern: The classification of support as biodiversity-harmful covers agriculture, irrigation, water, energy, infrastructure, forestry and industrial measures that may also advance food security, affordability, employment, industrialisation or resilience. Withdrawal or redesign without sector analysis could raise costs, affect consumer prices and weaken regional competitiveness.

BE recommendation: Publish and validate the inventory and methodology. Assess direct ecological harm separately from general public investment. Redesign and positive conditionality should normally precede phase-out, supported by sector dialogue and transition assistance.

> **Requested wording:** No incentive shall be withdrawn or materially redesigned solely because it has been classified as biodiversity-harmful. Each proposed reform shall undergo transparent sector-specific economic, social and environmental assessment, including effects on production costs, food and water security, employment, consumer prices, investment certainty, SMEs and regional competitiveness. Reform shall include stakeholder consultation, a reasonable transition period, monitoring of outcomes and viable positive alternatives.

3.9 Institutional architecture and organised-business representation

Relevant provisions: National implementation arrangements, including the proposed National Biodiversity Council (NBC), Biodiversity Coordination and Knowledge Unit (BCKU), Biodiversity Finance Unit and thematic working groups; approved NDC 3.0, sections 5.2 and 5.3.

Material concern: The proposed structures may improve coordination but could also create another layer over MTEA, EEA, ENTC, finance and sector institutions. NDC 3.0 already assigns climate coordination to MTEA and envisages a National Climate Change Executive Committee, a Climate Finance Unit and strengthened MRV arrangements. The NBSAP does not consistently define how its proposed structures will interoperate with those arrangements, nor their legal basis, decision rights, reporting lines, funding or accountability. Organised business is not expressly secured in the indicative governance arrangements even though several targets directly affect firms.

BE recommendation: Clarify mandates and relationships, retain statutory accountability in legally empowered institutions and require interoperability with the approved NDC 3.0 governance, finance and MRV framework. Provide formal representation for organised business on bodies dealing with disclosure, finance, incentives, sustainable production and industrial development.

> **Requested wording:** The NBC, BCKU, Biodiversity Finance Unit and thematic working groups shall have published terms of reference that define their legal basis, composition, decision rights, reporting lines, funding, conflicts-of-interest rules and relationship with existing statutory institutions. NBSAP institutional, finance and monitoring arrangements shall interoperate with the approved NDC 3.0 coordination framework, including MTEA-led coordination, climate-finance and national MRV functions. New biodiversity structures shall not duplicate existing mandates, reporting systems or finance functions. Organised business shall have formal representation on the NBC and on technical structures addressing disclosure, finance, incentive reform, sustainable production, forestry and industrial development.

3.10 Policy coherence across economic and sector frameworks

Relevant provisions: Target 14; Chapter 9 mainstreaming; national implementation arrangements; approved NDC 3.0 throughout, particularly sections 3.1.8, 4.6, 5.2 and 5.3.

Material concern: The NBSAP affects land, water, agriculture, forestry, energy, mining, tourism, infrastructure, finance, municipalities and industrial policy, but the implementation framework does not systematically reconcile potential conflicts with existing or emerging economic and sector policies. Because approved NDC 3.0 contains overlapping commitments on forests, OECMs, restoration, corporate disclosure, finance and data systems, inconsistent implementation would expose both government and business to competing definitions and obligations. A separate biodiversity approval track would worsen rather than solve policy fragmentation.

BE recommendation: Treat approved NDC 3.0 as the authoritative national climate-policy reference for overlapping climate-biodiversity actions. Add a policy-coherence matrix and a cross-government process for resolving conflicts before measures enter budgets, permits, procurement rules or sector regulation.

> **Requested wording:** The NBSAP shall be implemented consistently with the approved NDC 3.0 in all areas of overlap and shall not introduce conflicting definitions, baselines, reporting channels, finance expectations or institutional mandates. The implementation framework shall include a policy-coherence matrix identifying, for each material action, the relevant sector policy, responsible institution, potential conflict or overlap, required legal reform and resolution mechanism. The matrix shall cover national development planning, NDC 3.0, the Spatial Development Framework, land and water policy, agriculture, forestry, energy, industrialisation, investment, trade and exports, tourism, public procurement, SMEs, competition and consumer protection. Where an inconsistency is identified, it shall be resolved through the competent statutory and cross-government process before a business-facing measure is implemented.

3.11 Positive incentives and transition support

Relevant provisions: Targets 18 and 19; biodiversity finance and means-of-implementation chapters.

Material concern: The draft describes disclosure, compliance, subsidy reform and corporate-finance expectations more specifically than it describes the enabling package for businesses transitioning to biodiversity-positive production. This imbalance may increase operating costs without producing investable alternatives, particularly for SMEs and outgrowers.

BE recommendation: Tie every new obligation or phase-out measure to an implementation package with financing, technical support, technology adoption and market-access assistance.

> **Requested wording:** The costed implementation plan shall pair new business-facing requirements with positive incentives and transition measures, including concessional finance, appropriate tax incentives, green public-procurement preferences, credit guarantees and grants for SMEs, technical assistance, cleaner-production support, certification assistance, export-compliance support and co-financing for verified restoration, water-efficiency and invasive-species-management investments.

3.12 Biodiversity offsets, PES and innovative finance

Relevant provisions: Sections 11.9-11.10 and Target 19; approved NDC 3.0, section 5.2.1 (Finance).

Material concern: Payments for ecosystem services, biodiversity offsets, credits, green bonds and blended-finance mechanisms may support investment, but they require legal, institutional, property-right and tax clarity. NDC 3.0 also proposes green-finance reporting, carbon-market and PES-related instruments. Poorly coordinated systems could create double charging, weak additionality, competing claims to the same outcome or pressure to offset impacts that should be avoided.

BE recommendation: Begin with carefully governed pilots only after a common NDC-NBSAP enabling framework is established. Maintain the mitigation hierarchy, exclude irreplaceable ecosystems from offsetting and apply a single registry and attribution protocol where climate and biodiversity claims overlap.

> **Requested wording:** PES, biodiversity offsets, credits, green bonds and blended-finance mechanisms shall be introduced only after the applicable legal framework, property and resource rights, valuation methodology, institutional responsibilities, tax treatment, verification standards, grievance procedures and double-counting safeguards have been established. Where outcomes are claimed under NDC 3.0 and the NBSAP, a common registry and attribution protocol shall prevent duplicate claims, charges or financing. Offsets shall apply only to residual impacts after avoidance, minimisation and restoration, and shall not justify loss of irreplaceable ecosystems.

3.13 Proportionate access and benefit-sharing reporting

Relevant provisions: Target 15.3 and Target 13.

Material concern: Target 15.3 applies ABS compliance reporting to all companies, although most firms do not access or use genetic resources, digital sequence information or associated traditional knowledge and many do not issue annual sustainability reports.

BE recommendation: Limit reporting to entities whose activities fall within the applicable ABS framework and provide one competent authority, standard procedures and confidentiality protection.

> **Requested wording:** Target 15.3 shall apply only to companies, researchers and commercial entities that access, utilise, develop or commercialise genetic resources, digital sequence information or associated traditional knowledge within the scope of applicable ABS legislation. Implementation shall identify one competent authority and provide published timelines and fees, standard templates, confidentiality safeguards and appeal procedures.

3.14 Monitoring indicators and compliance quality

Relevant provisions: Monitoring framework indicators for Targets 14, 15 and 19, including numbers of reporting companies and finance mobilised; approved NDC 3.0, sections 5.2.1 and 5.3.

Material concern: Indicators based mainly on counts of reporting entities or gross finance mobilised may reward administrative volume rather than meaningful risk reduction. They may also count existing compliance expenditure, voluntary contributions and public finance inconsistently. NDC 3.0 separately seeks stronger MRV and green-finance reporting, creating a clear need for common baselines, definitions and attribution rules.

BE recommendation: Measure material outcomes, reporting quality and avoided duplication. Make NBSAP business and finance indicators interoperable with national NDC MRV and finance reporting, and publish indicator definitions and attribution rules before implementation.

> **Requested wording:** Business-related indicators shall assess material risk coverage, data quality, reduced impacts, implementation outcomes and compliance cost, rather than only the number of reporting entities or the gross value of finance mobilised. Indicator protocols shall define baselines, attribution, treatment of existing statutory and in-kind expenditure, confidentiality, verification and rules against double counting. NBSAP reporting shall use common definitions and interoperable data arrangements with NDC 3.0 MRV and climate-finance reporting wherever the same activity, expenditure or outcome is measured.

4. Cross-cutting implementation principles

Principle	Application
Lawfulness	Strategic language should not bypass legislation, regulations or existing mandates.
Materiality	Requirements should focus on activities and entities with meaningful biodiversity risks, dependencies or impacts.
Proportionality	Compliance expectations should reflect size, sector, capability and risk, with simplified treatment for SMEs.
No duplication	Information and expenditure should be recognised once and reused across authorised systems.
NDC alignment	Overlapping definitions, baselines, reporting, finance and governance arrangements should be consistent and interoperable with approved NDC 3.0.
Competitiveness	Material reforms should be assessed for investment, production, employment, consumer-price and regional-trade effects.
Due process	Land-use restrictions and new obligations require consultation, transition, review and appeal mechanisms.
Partnership	Organised business should participate in the design, piloting, monitoring and review of business-facing measures.
Public responsibility	Private finance should complement, not replace, sustainable public funding for national institutions and public conservation functions.

5. Requested next steps

BE respectfully requests that the Ministry and ENTC incorporate the amendments above, or equivalent safeguards, before the NBSAP is submitted for final approval. In particular, the final text should expressly resolve the scope of Target 15, private-sector financing expectations, the treatment of existing compliance systems and certified forestry operations, the definition of forest loss, the legal effect of spatial planning and OECM proposals, and consistency with approved NDC 3.0 across definitions, reporting, finance, monitoring and institutional mandates.

BE further recommends a short joint technical review of the revised business-facing provisions with organised business, affected sector representatives and the officials responsible for NDC implementation and MRV. During implementation, a formal private-sector technical working arrangement should support the design of disclosure standards, finance mechanisms, subsidy reforms, spatial safeguards and monitoring indicators before national rollout.

6. Conclusion

Business Eswatini supports the adoption of a credible and implementable National Biodiversity Strategy that protects Eswatini's natural capital while strengthening resilience, investment quality and long-term competitiveness. The final NBSAP will be stronger if it combines biodiversity ambition with clear law, proportionate obligations, accountable institutions, economic assessment, positive incentives, meaningful public-private consultation and coherent implementation alongside approved NDC 3.0.

BE remains available to participate in the technical refinement and implementation of the strategy and to facilitate structured engagement with affected sectors.