

TNFD Metric no.	TNFD content			ESRS Paragraph number	Final comment for publication
	Driver of nature change	Indicator	Metric		
	Climate Change	GHG Emissions	Refer to ISSB's IFRS-S2 Climate-related Disclosures Standard	See the upcoming ESRS-IFRS interoperability	
C1.0	Land/freshwater/ ocean-use change	Total spatial footprint	Total spatial footprint (km2) (sum of): <ul style="list-style-type: none"> • Total surface area controlled/managed by the organisation, where the organisation has control (km2); • Total disturbed area (km2); • Total rehabilitated/restored area (km2). 	ESRS E4 E4-5 para. 38; and para. AR 34	ESRS and TNFD require a different breakdown.
C1.1		Extent of land/ freshwater/ ocean-use change	Extent of land/freshwater/ocean ecosystem use change (km2) by: <ul style="list-style-type: none"> • Type of ecosystem; and • Type of business activity. 	ESRS E4 E4-5 para. 38 (a)	ESRS requires relevant metrics, providing flexibility to preparers to specify what these are, whilst TNFD requires a specific metric and breakdown.
		Extent of land/freshwater/ocean ecosystem conserved or restored (km2), split into: <ul style="list-style-type: none"> • Voluntary; and • Required by statutes or regulations. 	ESRS E4 E4-5 para. 38 (b)	TNFD is more specific, in recommending to disclose on positive impacts and on sustainably managed ecosystems, broken down by ecosystem type and by type of business activity.	
C2.0	Pollution/ pollution removal	Pollutants released to soil split by type	Pollutants released to soil (tonnes) by type, referring to sector-specific guidance on types of pollutants.	ESRS E2 E2-4 para. 28(a); para. AR 21	
C2.1	Wastewater discharged		Volume of water discharged (m3), split into: <ul style="list-style-type: none"> • Total; • Freshwater; and • Other. 	ESRS E3 E3-4 para. AR 32	TNFD additionally recommends to disclose information split by total; freshwater; and other.
			Including: <ul style="list-style-type: none"> • Concentrations of key pollutants in the wastewater discharged, by type of pollutant, referring to sector-specific guidance for types of pollutants; and • Temperature of water discharged, where relevant 	ESRS E2 E2-4 para. 28 (a)	TNFD asks for concentrations in receiving water body, ESRS asks for pollution loads.
C2.2	Waste generation and disposal		Weight of hazardous and non hazardous waste generated by type (tonnes), referring to sector-specific guidance for types of waste. Weight of hazardous and nonhazardous waste (tonnes) disposed of, split into: <ul style="list-style-type: none"> • Waste incinerated (with and without energy recovery); • Waste sent to landfill; and • Other disposal methods. 	ESRS E5 E5-5 para. 37 (a)(c)	
			Weight of hazardous and nonhazardous waste (tonnes) diverted from landfill, split into waste: <ul style="list-style-type: none"> • Reused; • Recycled; and • Other recovery operations. 	ESRS E5 E5-5 para. 37 (b)	
	Plastic pollution		Plastic footprint as measured by total weight (tonnes) of plastics	ESRS E2 E2-4 para. 28 (b)	ESRS and TNFD are aligned in requiring raw material content, even though the

C2.3			(polymers, durable goods and packaging) used or sold broken down into the raw material content.	ESRS E5 E5-4 para. 31	ESRS and TNFD are aligned in requiring raw material content, even though the breakdowns are different.
				ESRS E5 E5-5 para. 37 and 38 (b)	
			For plastic packaging, percentage of plastics that is: <ul style="list-style-type: none"> • Re-usable; • Compostable; • Technically recyclable; and • Recyclable in practice and at scale. 	ESRS E5 E5-5 para. 35 and para. 36 (c)	ESRS and TNFD are aligned in the requirement, even though different breakdowns are required.
C2.4		Non-GHG air pollutants	Non-GHG air pollutants (tonnes) by type : <ul style="list-style-type: none"> • Particulate matter (PM2.5 and/or PM10); • Nitrogen oxides (NO2, NO and NO3); • Volatile organic compounds (VOC or NMVOC); • Sulphur oxides (SO2, SO, SO3, SOX); and • Ammonia (NH3) 	ESRS E2 E2-4 para. 28(a) and para. AR 21	
C3.0	Resource use/replenishment	Water withdrawal and consumption	Water withdrawal and consumption (m3) from areas of water scarcity, including identification of water source.	ESRS E3 E3-4 para. 28 (b)(e) ESRS E3 E3-4 para. AR. 32	TNFD and ESRS are aligned in their requirement. In ESRS areas of water risk includes and goes beyond areas of water scarcity in TNFD.
C3.1		Quantity of high-risk natural commodities sourced from land/ocean/freshwater	Quantity of high-risk natural commodities (tonnes) sourced from land/ocean/freshwater, split into types, including proportion of total natural commodities.	ESRS E3 para. AR 10 and AR 15 ESRS E4 para. AR 8	TNFD focuses on high-risk natural commodities only. Additionally, TNFD requests for more granular information in the quantities and proportions of natural commodities. Organisations may disclose this as part of Phase 2 of LEAP Approach also under ESRS.
			Quantity of high-risk natural commodities (tonnes) sourced under a sustainable management plan or certification programme, including proportion of total high-risk natural commodities.	ESRS E5 E5-4 para. 31 (b) ESRS E4 E4-2 para. AR 12	
C4.0	Invasive alien species and other	Placeholder indicator: Measures against unintentional introduction of invasive alien species (IAS)	Proportion of high-risk activities operated under appropriate measures to prevent unintentional introduction of IAS, or low-risk designed activities.	ESRS E4 E4-5 para. 39	ESRS and TNFD indicators are aligned in terms of content but differ regarding the metrics.
C5.0	State of nature	Placeholder indicator: Ecosystem condition	For those organisations that choose to report on state of nature metrics, the TNFD encourages them to report the following indicators, and to refer to the TNFD additional guidance on measurement of the state of nature in Annex 2 of the LEAP approach: <ul style="list-style-type: none"> • Level of ecosystem condition by type of ecosystem and business activity; 	ESRS E4 E4-5 para. 41 (b)(i)	In ESRS, preparers can decide to report this metric if relevant.
			Placeholder indicator: Species extinction risk	• Species extinction risk. There are a number of different measurement options for these indicators. The TNFD does not currently specify one metric as there is no single metric that will capture all relevant dimensions of changes to the state of nature and a consensus is still developing. The TNFD will continue to work with knowledge partners to increase alignment.	ESRS E4 E4-5 para. 40 (d)

C7.0	Risk	Value of assets, liabilities, revenue and expenses that are assessed as vulnerable to nature-related transition risks (total and proportion of total).	ESRS E1 E1-9 para. 67	TNFD is more specific in its disclosure recommendations (value of assets, liabilities, revenues and expenses), that falls under the more generic anticipated financial effects in ESRS E2, E3, E4 and E5, while in E1 the level of specificity of the requirement is the same as TNFD.
			ESRS E2 E2-6 para. 36; para. 38 (a)	
ESRS E2 para. AR 7(a)				
ESRS E3 para. AR 13(a)				
ESRS E4 para. 17 (c)				
ESRS E4 E4-6 para. 42; para. 45 (a)				
ESRS E4 para. AR 9(b)				
ESRS E5 E5-6 para. 41; para. 42(a)				
ESRS E5 para. AR 5(a)				
ESRS E2 para. AR 9(a)				
C7.1	Risk	Value of assets, liabilities, revenue and expenses that are assessed as vulnerable to nature-related physical risks (total and proportion of total).	ESRS E3 para. AR 9(a)	TNFD is more specific in its disclosure recommendations (value of assets, liabilities, revenues and expenses), that falls under the more generic anticipated financial effects in ESRS E2, E3, E4 and E5, while in E1 the level of specificity of the requirement is the same as TNFD.
			ESRS E4 para. AR 9(a)	
			ESRS E4 para. 17 (c)	
			ESRS E5 para. AR 5(b)	
			ESRS E1 E1-9 para. 66	
			ESRS E2 E2-6 para. 36; para. 38 (a)	
			ESRS E3 E3-5 para. 30; para. 32(a); para. 33(a)	
			ESRS E4 E4-6; para. 42; para. 45 (a)	
			ESRS E5 E5-6 para. 41; para. 42(a); para. 43(a)	
			ESRS E1 E1-9 para. 67	
C7.2	Risk	Description and value of significant fines/penalties received/litigation action in the year due to negative nature-related impacts	ESRS 2 SBM-3 para. 48 (d)	TNFD specifically requires litigation, fines and penalties. This metric is covered under ESRS requirements related to current financial effects in the materiality assessment (refer to SBM-3 para 48 (d)) and the environmental topical standards within ESRS 2 IRO-1 (refer to ESRS 2 AR7, ESRS E3 AR13 and ESRS E4 AR9).
C7.3	Opportunity	Amount of capital expenditure, financing or investment deployed towards nature-related opportunities, by type of opportunity, with reference to a government or regulator green investment taxonomy	ESRS E4 E4-1 para. AR 1 (f) ESRS E1 E1-3 para. 29	TNFD requires explicitly Capex, financing or investment in connection with opportunities.
C7.4	Opportunity	Increase and proportion of revenue from products and services producing demonstrable positive impacts on nature with a description of impacts.	ESRS 2 SBM-1 para 40 (f) and (g) ESRS E1 E1-9 para. 69	TNFD is more specific in its disclosure recommendations (proportion of revenue from products and services producing demonstrable positive impacts) whilst the ESRS approach is more descriptive and linked to the undertaking's strategy and business model in ESRS 2 SBM-1. In E1 the level of specificity of the requirement is the same as TNFD.