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Digital sequence information on genetic resources

Review methodology of effectiveness of the Multilateral Mechanism for the Fair and Equitable Sharing of Benefits from the Use of Digital Sequence Information on Genetic Resources, including the Cali Fund**

Note by the Secretariat acting as the interim Secretariat of the Multilateral Mechanism, including the Cali Fund***

I. Introduction

1. In decision [16/2](#), the Conference of the Parties adopted the modalities for operationalizing the Multilateral Mechanism for the Fair and Equitable Sharing of Benefits from the Use of Digital Sequence Information on Genetic Resources, including the Cali Fund.
2. Paragraph 29 of decision [16/2](#) requires a review of the effectiveness of the Multilateral Mechanism at the eighteenth meeting of the Conference of the Parties and at every second subsequent such meeting. The Steering Committee was to develop the review methodology, the Subsidiary Body on Implementation to review it, and the Conference of the Parties to adopt at its seventeenth meeting.
3. The present document contains the draft review methodology for the consideration of the Subsidiary Body on Implementation. A corresponding draft recommendation can be found in document CBD/SBI/7/5.

II. Consideration for the development of the review methodology

4. Several issues were given special consideration by the Steering Committee in the preparation of the present methodology:
 - (a) Paragraph 9 of decision 15/9 established factors that any solution for benefit-sharing from the use of digital sequence information on genetic resources should reflect. The review considers these factors alongside the eighteen factors in enclosure VI of decision [16/2](#);
 - (b) Paragraphs 18 and 20 of the annex to decision [16/2](#) link the activities funded by the Cali Fund with the implementation of national biodiversity strategies and action plans and relevant goals

* [CBD/SBI/7/1](#).

** The present document is being issued without formal editing.

*** In its paragraph 28, the text of the modalities of the Multilateral Mechanism, including the Cali Fund, provides for the establishment of a Secretariat, with functions outlined in enclosure V of the modalities (see decision [16/2](#), annex). Pending the establishment of this Secretariat, relevant officers of the Convention Secretariat serve as the interim Secretariat of the Multilateral Mechanism, including the Cali Fund.

and targets of the Kunming-Montreal Global Biodiversity Framework, themselves contributing to an increase in positive biodiversity outcomes globally;

(c) Paragraph 30 of the annex to decision [16/2](#) requires the review to draw on the relevant indicators of the Kunming-Montreal Global Biodiversity Framework, including Goal C, as well as Target 13 and its binary indicator;

(d) To ensure alignment with the Cali Fund's expected outcomes, the present review also utilizes the theory of change (sect. III of the [Terms of Reference of the Cali Fund](#))¹ as a reference point:

- (i) The objectives of the Convention are advanced;
- (ii) The self-identified needs of indigenous peoples and local communities, including women and youth are supported;
- (iii) The capacity gap to generate, access, use, analyze and store DSI is narrowed;
- (iv) Scientific research on biodiversity is supported.

(e) The terms “digital sequence information on genetic resources”, “use of digital sequence information on genetic resources” and “benefit directly or indirectly from the use of digital sequence information on genetic resources” have no agreed definitions. The methodology therefore treats both as scope variables. At each review cycle, the evaluability update must report on any decisions of the Parties, national measures or judicial interpretations that have clarified either term, and flag which elements of assessment are affected. The methodology takes a ‘whole of Mechanism’ approach: it evaluates contribution-trigger design, governance, fund operations, allocation methodology, non-monetary benefit-sharing, database interactions and coherence with national access and benefit-sharing frameworks and other access and benefit-sharing instruments.

5. Two sets of factors are central to the methodology: enabling conditions and evaluation assumptions.

6. For the Multilateral Mechanism to succeed, five enabling conditions (EC1–EC5) must be in place in the ecosystem in which the Mechanism operates. They are treated as structural preconditions: failures in enabling conditions require different policy responses than failures in mechanism design. The five conditions are:

- (a) Industry clarity on contribution conditions (EC1);
- (b) A commercially viable business case (EC2);
- (c) Legal certainty for contributors and providers (EC3);
- (d) Functional identified or designated receiving entities (EC4);
- (e) Effective governance with sustained political commitment (EC5).

7. The review assesses the Multilateral Mechanism through six evaluation pillars (P1–P6) and a governance assessment (G1). P1 covers resource mobilisation and distribution; P2 covers contribution levels, trigger design, efficiency and administrative costs; P3 covers non-monetary benefits, including open access to digital sequence information on genetic resources; P4 covers the Mechanism's contribution to the Kunming-Montreal Global Biodiversity Framework and legal certainty for contributors; P5 covers coherence with national access and benefit-sharing frameworks and other international instruments; and P6 covers the rights, open access obligations and research impacts relating to indigenous peoples and local communities. G1 assesses the Mechanism's governance against six indicators: decision-making inclusivity, transparency, management response quality, institutional coherence, fiduciary integrity, and governance setup progress.

¹ https://mptf.undp.org/sites/default/files/documents/2025-04/tor_cali_fund.pdf.

8. The following four assumptions reflect the design of the mechanism as established by decisions of the Conference of the Parties. The evaluation works within their constraints.

9. **Assumption 1 — Decoupling from traceability (decision 15/9, para. 5).** The mechanism does not require proof that a specific digital sequence information on genetic resources was used by a specific contributor. Also, all rights under the Nagoya Protocol and other instruments are preserved (decision 15/9, para. 11; decision 16/2, para. 27). The assessment focuses on whether the Mechanism generates intended flows and outcomes at the system level, not whether individual contributions are traceable to specific uses.

10. **Assumption 2 — Multilateral attribution through contribution-plausibility (decision 15/9, para. 5).** The mechanism establishes sectors in which it is plausible that the economic activity is reliant on the use of digital sequence information on genetic resources. This contribution-plausibility framework is the principal analytical method for Pillar 1 and Pillar 2 findings. The approach for this review methodology was aligned with that of comparable mechanisms: three-level assessment structure and evaluability-update-first approach from the Green Climate Fund; financial reporting and tiered data-access model from the Montreal Protocol Multilateral Fund; equity and non-monetary benefit assessment from the Benefit-sharing Fund of the International Treaty on Plant Genetic Resources for Food and Agriculture. The rating scale and compliance-based logic of the Green Climate Fund project log-frames is incompatible with the Cali Fund's voluntary design, and so only the three-level assessment structure (performance, design and operational) and the evaluability-update-first approach were deemed applicable to this methodology. The Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction and the World Health Organization's Pandemic Agreement annex on Pathogen Access and Benefit Sharing are relevant as boundary instruments for the part of Pillar 5 on coherence with other international instruments and contribution stacking risk, but currently do not have applicable evaluation methodologies.

11. **Assumption 3 — Since the enabling conditions enumerated in paragraph 7 are structural preconditions and not mechanism failures, even a well-designed mechanism will underperform if enabling conditions are absent.** Each condition represents a distinct failure mode requiring a different policy response, and the number of Parties implementing paragraph 13² of the annex to decision 16/2 measured by the time of the review by the Conference of the Parties at their eighteenth meeting is the most important leading signal for this first review. The review therefore must first establish which enabling conditions were in place when the mechanism operated. If enabling conditions fall short, low performance will not signal a design flaw requiring the Conference of the Parties to change the Multilateral Mechanism but rather a precondition failure or short coming, requiring diplomatic, legal and/or capacity-building responses. The evaluability update must therefore include an enabling-condition diagnostic before any pillar findings are presented. The Secretariat should develop:

(a) A survey to gather data for the enabling conditions 1 and 2 on industry clarity on contribution conditions and on a commercially viable business case, respectively;

(b) A tracker tool for the countries which did put in place measures administrative, policy or legislative measures to incentivize users' contributions;

(c) A protocol to address the risk of contribution stacking;

(d) A readiness assessment for the enabling condition 4 on the designation of institutions to receive contribution for indigenous peoples and local communities and their readiness;

² "13. Parties and non-Parties are invited to take administrative, policy or legislative measures, consistent with national legislation, to incentivize users in their jurisdiction to contribute to the global fund in line with the modalities of the multilateral mechanism."

(e) Qualitative protocols for the enabling condition 5 on effective governance with sustained political commitment.

12. **Assumption 4 — Phased operationalization and modularity.** The methodology is adopted before the Mechanism is fully operational. The allocation formula, contribution thresholds, database interface measures and governance structures are still being finalized, some of which will be presented by the Steering Committee to the Conference of the Parties at its seventeenth meeting. The methodology is therefore modular: elements whose evaluability depends on a finalised design feature are classified as modality-contingent and flagged as “not yet evaluable”.

13. Three limitations are assumed by this methodology as they cannot be remedied by improved data collection:

(a) Attribution: outcomes cannot be attributed to specific digital sequence information on genetic resources, contributor or country of origin (decision 15/9, para. 5). The review cannot satisfy demands for bilateral origin-benefit linkages;

(b) Political questions: whether the trigger, thresholds or allocation formula are “fair” in an absolute sense is a political question for the Parties. The review only assesses performance against the criteria in paragraph 9 of decision 15/9;

(c) Party requests: The allocation formula, thresholds and rates of contribution are set through separate processes decided by the Parties. The review can only assess whether adopted rates are generating the intended flows and whether thresholds appear to be a barrier to uptake (enabling condition 2).

Annex

Draft review methodology

1. The present annex sets out the operational methodology for the review of the effectiveness of the Multilateral Mechanism, including the Cali Fund. The methodology is organised around three elements. First, a consolidated review framework (sect. 1) maps each element of assessment across six evaluation pillars (P1–P6, see para 7 above) and a governance assessment (G1, see para. 7 above), linked to the five enabling conditions (EC1–EC5, see para. 6 above). Second, the methodological approach (sect. II below) defines how data are collected and analysed, the independence requirements for evaluators, the structure of the review report, and the process for the Steering Committee to respond and follow-up. Third, governance arrangements (sect. III below) describe the roles of the bodies involved in the review process.
2. Because the mechanism is adopted before it is fully operational, the methodology is modular: elements whose evaluability depends on a design decision not yet taken are classified as modality-contingent and reviewed as those decisions are made.

I. Consolidated review framework

3. Table 1 contains elements evaluable at the eighteenth meeting of the Conference of the Parties, either fully or conditionally. Elements marked † are conditional on specific decisions or actions at, or immediately following, the seventeenth meeting of the Conference of the Parties such as the adoption of the allocation formula, the adoption of the manual of operations, and the launch of a survey or tracker. Table 2 contains elements that are not evaluable at the eighteenth meeting of the Conference of the Parties regardless of the outcome of the seventeenth meeting's outcomes, primarily because operational conditions or external instruments are not in place.

Table 1

Consolidated review framework — elements fully or conditionally evaluable at the eighteenth meeting of the Conference of the Parties

<i>Pillar/Element</i>	<i>Data status</i>	<i>Data source</i>	<i>Evaluability</i>
P1 — Resource mobilization and distribution			
Total contributions received (volume, number, sector)	Existing (MPTFO)	MPTFO financial report ¹	Fully evaluable; feeds KMGBF Target 13 indicators
Distribution by region and entity type †	Existing (MPTFO) — formula modality-contingent	MPTFO allocation data	Basic distributional data evaluable now; full evaluation requires adopted allocation formula. Conditional on adoption of allocation formula at COP-17
Disbursement rate	Existing (MPTFO)	MPTFO financial report	Fully evaluable
Allocation process compliance (transparency, accountability, gender-responsiveness)	Existing (Fund Secretariat)	Secretariat narrative report ⁵	Fully evaluable
Governance setup progress — G1.vi (leading element) (see G1 below) †	Existing (Fund Secretariat)	Cali Fund Annual Report ⁵ ; report of the Steering Committee to the Conference of the Parties; Steering Committee meeting minutes; manual of operations (once adopted)	Fully evaluable; if the manual of operations is adopted by COP-17, G1.vi will be evaluable in full. Conditional on adoption of manual of operations at COP-17
P2 — Contribution levels, trigger design, efficiency and costs			
Contributions are activated for the users identified by the Parties (Enclosure I of decision 16/2)	Existing (MPTFO)	MPTFO financial report	Fully evaluable

¹ MPTFO financial report + Fund Secretariat narrative report = Cali Fund annual report.

<i>Pillar/Element</i>	<i>Data status</i>	<i>Data source</i>	<i>Evaluability</i>
EC1 — contributor awareness and clarity of contribution conditions †	To develop (survey)	Contributor/stakeholder survey	Evaluable in survey launched soon after COP-17; interim results possible before COP-18. Conditional on Secretariat launching survey post-COP-17
EC2 — business-case perception of contribution thresholds †	To develop (survey)	Contributor/stakeholder survey	Evaluable if survey launched soon after COP-17; interim results possible before COP-18. Conditional on Secretariat launching survey post-COP-17
P3 — Non-monetary benefits			
Open access to DSI — FAIR principles compliance	Existing (databases)	Database operator voluntary reports	Fully evaluable if reports made available
P4 — KMGBF contribution and legal certainty			
EC3(a) — national incentivization measures (ABS discharge) †	To develop (Party notification)	Party notification on national ABS measures including DSI; Secretariat §13 tracker	Evaluable if tracker is launched and Party notification issued immediately after COP-17. Conditional on Secretariat launching tracker and COP-17 authorising Party notification.
P5 — Coherence with national ABS and other instruments			
<i>All elements</i>	—	—	<i>No P5 elements evaluable at COP-18. All P5 elements in table 2</i>
P6 — Rights of indigenous peoples and local communities, open access and research impacts			
<i>All elements</i>	—	—	<i>No P6 elements evaluable at COP-18. All P6 elements in table 2</i>
G1 — Governance Assessment			
G1.i — Decision-making inclusivity †	Interim (Secretariat)	SC meeting minutes; manual of operations (once adopted)	Fully evaluable; manual of operations (if adopted at COP-17) adds allocation formula governance
G1.ii — Transparency and timeliness of documentation	Interim (Secretariat)	Secretariat periodic report	Fully evaluable

<i>Pillar/Element</i>	<i>Data status</i>	<i>Data source</i>	<i>Evaluability</i>
G1.iii — Quality of management response †	Existing (SC)	SC management response; manual of operations (once adopted)	Fully evaluable from COP-18; manual of operations (if adopted at COP-17) adds allocation governance
G1.iv — Institutional coherence (SC / Fund Secretariat / MPTFO)	Existing (Secretariat)	Secretariat periodic report	Fully evaluable
G1.v — Fiduciary and financial integrity	Existing (MPTFO)	MPTFO annual report; MPTFO processes	Fully evaluable
G1.vi — Governance setup progress (most important leading element) †	Existing (Secretariat)	SC meeting minutes; Cali Fund annual reports; Manual of Operations (once adopted)	Fully evaluable; if the manual of operations is adopted at COP-17, governance setup evaluable in full
EC1–EC5 — Enabling-condition diagnostic (cross-cutting summary)			
EC1 — Industry clarity (see P2 above)	To develop (survey)	Contributor/stakeholder survey	See P2 above †
EC2 — Business-case fit (see P2 above)	To develop (survey)	Contributor/stakeholder survey	See P2 above †
EC3 — Legal certainty (see P4 above and table 2)	See P4/Table 2	See P4 / table 2	EC3(a) see P4 above; EC3(b)/(c) see table 2
EC4 — Institutional readiness of indigenous peoples and local communities (see table 2)	To develop (assessment)	Consultation of indigenous peoples and local communities; Party reports	See table 2
EC5 — Governance quality (see G1 above)	Existing (qualitative)	Secretariat; SC meeting minutes	See G1 above
<i>Colour coding:</i> green = existing data available; amber = data to be developed, instrument not yet in place, or evaluation conditional on a COP-17 decision; grey = cross-reference rows. <i>Abbreviations:</i> ABS, access and benefit-sharing; COP, Conference of the Parties; EC, enabling condition; MPTFO, Multi-Partner Trust Fund Office; SC, Steering Committee.			

Table 2

Consolidated review framework — elements not yet evaluable at the eighteenth meeting of the Conference of the Parties

<i>Pillar/Element</i>	<i>Data status</i>	<i>Data source</i>	<i>Evaluability</i>
P2 — Contribution levels, trigger design, efficiency and costs			
Transaction costs and administrative burden	To develop (study)	SC-commissioned study	Evaluable at a future COP; requires dedicated study
P3 — Non-monetary benefits			
Volume and type of non-monetary benefits	To develop (reporting)	Database operator reports in table 1; contributor/stakeholder survey	Partially evaluable; typology and survey to be developed; fully evaluable at a future COP
P4 — KMGBF contribution and legal certainty			
Contribution to KMGBF Goal C/Target 13 binary indicator	Not yet evaluable	KMGBF monitoring report/PMRR	Not yet evaluable: no DSI-specific information in KMGBF Goal C/Target 13 at the moment; PMRR does not contain allocation formula data. Evaluable at a future COP.
Alignment with PMRR reporting cycles	Not yet evaluable	PMRR/Secretariat	Not yet evaluable: PMRR does not yet contain allocation formula data. Evaluable at a future COP.
P5 — Coherence with national access and benefit-sharing measures and other instruments			
EC3(b) — contribution-stacking risk (ITPGRFA, BBNJ, WHO PABS)	To develop (protocol)	Secretariat stacking risk protocol	Not yet evaluable: Other international instruments have yet to decide whether and how to deal with the sharing of benefits from the use of digital sequence information on genetic resources within their scope. Evaluable at a future COP.
EC3(c) — provider confidence (national ABS alignment)	To develop (assessment)	Party national reports/PMRR; Party notification	Partially evaluable through Party notification only; results considered interim given early stage of mechanism. Monitor in subsequent cycles, including on the perception of a voluntary extension of the mechanism
Coherence with NBSAPs and national DSI/ABS measures	Existing (CBD)	PMRR/Secretariat	Partially evaluable (interim results only given early stage of mechanism). Monitor in subsequent cycles.

<i>Pillar/Element</i>	<i>Data status</i>	<i>Data source</i>	<i>Evaluability</i>
P6 — Indigenous peoples and local communities' rights, open access and research impacts			
EC4 —Institutional readiness of indigenous peoples and local communities and entity designation	To develop (assessment)	Consultation of indigenous peoples and local communities; Party reports	Not yet evaluable: Cali Fund operations not fully started. Evaluable at a future COP.
Benefits received by indigenous peoples and local communities and their identified or designated entities	Existing / to develop	MPTFO allocation data; consultation of indigenous peoples and local communities	Partially evaluable for factors (o) and (q) through survey or Party notification; results considered interim. Monitor in subsequent cycles.
Non-hindrance of research and innovation, including on new technologies	To develop (study)	SC study; research community consultation	Not yet evaluable: Cali Fund operations not fully started. Evaluable at a future COP.
Biodiversity impact of funded activities	To develop	Secretariat; Party reports	Not yet evaluable; qualitative contribution assessment possible at a future COP.
<i>Colour coding:</i> green = existing data available; amber = data to be developed, instrument not yet in place, or evaluation conditional on a COP-17 decision; grey = cross-reference rows. Enclosure VI of decision 16/2 factors and OECD-DAC evaluation criteria are referenced in the element-level assessment records maintained by the Secretariat. <i>Abbreviations:</i> ABS, access and benefit-sharing; CBD, BBNJ, Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction; Convention on Biological Diversity; COP, Conference of the Parties; EC, enabling condition; ITPGRFA, International Treaty on Plant Genetic Resources for Food and Agriculture; MPTFO, Multi-Partner Trust Fund Office; PMRR, planning, monitoring, reporting and review; Steering Committee; WHO PABS, World Health Organization — Pathogen Access and Benefit-Sharing System.			

II. Methodological approach, consultation and quality assurance

4. The Steering Committee will have the oversight of this review. Data for the review is classified under three confidentiality tiers (public, restricted, sensitive) and collected through four minimum reporting templates:

- (a) MPTFO annual financial report,
- (b) Fund Secretariat annual narrative report,
- (c) Parties reporting on national implementation through a notification, and
- (d) Voluntary reporting by databases and tools on digital sequence information on genetic resources reports including on alignment with FAIR (findability, accessibility, interoperability and reuse of digital assets) and CARE (collective benefit, authority to control, responsibility, ethics) principles.

5. In addition, stakeholder consultations — including a structured questionnaire to Parties, indigenous peoples and local communities, database operators and contributors, as well as targeted consultations with indigenous peoples and local communities — will generate analytically usable evidence. Draft findings should be circulated to stakeholders for a comment period with all substantive comments recorded.

A. Independence and quality assurance

6. Analytical work is conducted by functionally independent evaluators free from conflicts of interest with the Steering Committee and its Secretariat, the Secretariat of the Convention, and the Multi-Partner Trust Fund Office.

7. Additionally, draft findings are subject to peer review.

B. Structure of the report

8. The review report should comprise five sections:

- (a) Executive summary;
 - (b) Evaluability update;
 - (c) Findings by category of pillar and G1, each presented as:
 - (i) Evidence;
 - (ii) Finding;
 - (iii) Conclusion;
 - (iv) Recommendation;
 - (d) Cross-cutting findings (equity, coherence, sustainability, enabling conditions); and
 - (e) Proposed adjustments (major or minor)
9. Additionally, the report should contain four annexes: A: data tables; B: consultation synthesis; C: management response and D: peer review record.

C. Steering Committee response to the assessment

10. The management response is the recommendation of the Steering Committee in the report itself. Each recommendation is accepted, accepted with modification, or declined with reasons. Every accepted recommendation carries an action plan entry specifying the action, responsible body, timeline and resource implications; recommendations of major revisions must be brought to the

Conference of the Parties for endorsement. A report of the implementation status of these action plans should be presented ahead of the subsequent review cycle.⁴

D. Follow-up to the report

11. Since the implementation status of the action plan from the previous review should be presented ahead of the subsequent review cycle, recommendations should be recorded as: completed on time / completed late / partially completed / not yet commenced, accompanied by an explanation for any delay and a revised timeline where appropriate. If an action in the plan is not completed with adequate explanation, it should be treated as an implementation failure and should be reported in the cross-cutting findings section of the next review report under G1.iii (quality of management response). The management response is a living document: the Steering Committee may update it between cycles to reflect changing circumstances but must report those changes to the Conference of the Parties, along with their reasons and consequences.

III. Governance, roles and responsibilities

12. The Conference of the Parties, once a methodology is adopted, will review its report. The Steering Committee, as the governing body of the Multilateral Mechanism and its Cali Fund, should have oversight of the methodology development, data collection, and final report. It should then prepare a proposal for management's response; note that the Steering Committee is itself subject to governance assessment under G1, which is managed through the independence requirement in section II.A.

13. The Secretariat of the Convention on Biological Diversity, currently acting as the interim Fund Secretariat, drives the methodology development, prepares submissions, coordinates data collection and compiles the resulting data.

14. The two mandates of the Conference of the Parties and its Secretariat, and of the Steering Committee and its interim Secretariat are distinct even while some staff might serve both entities. The circularity risk — that the Secretariat both prepares data and assists in interpreting it — is managed through the same independence provisions in section II.A: evaluators must independently verify Secretariat-supplied data against primary sources where possible, and the peer review record (as noted in para. 11 above) must document any data quality concerns raised.

15. The Multi-Partner Trust Fund Office will provide financial records through their public reporting obligations, contribution logs, disbursement data, audit reports and certified financial statements.

16. Parties will submit data as part of the planning, monitoring, reporting and review of the Kunming-Montreal Global Biodiversity Framework. Parties will also submit data on administrative, policy or legislative measures and incentivization of users in their jurisdiction. Finally, Parties will review draft findings as part of the review process.

17. Indigenous peoples and local communities will be consulted on CARE-compliant data handling, provide evidence on benefits received and review sensitive-tier passages.

18. Database operators should supply interface measure reports, access statistics and annual provenance data quality assessments.

19. Last, the private sector contributors should provide survey responses and inputs during consultation.

⁴ Steering Committee — the governing body of the Cali Fund, responsible for oversight, allocation decisions and management responses.