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Item 5 of the provisional agenda**

Digital sequence information on genetic resources

Synthesis of submission of views on possible additional modalities of the multilateral mechanism***

Note by the Secretariat

I. Introduction

1. In decision [16/2](#), the Conference of the Parties to the Convention on Biological Diversity decided to further explore the modalities of the multilateral mechanism, including, in the context of paragraph 7 of decision 15/9 and the annex to the decision 16/2, possible additional modalities that take products and services into account.
2. In response to the this, the Secretariat issued notification No. [2025-114](#) inviting Parties, other Governments, indigenous peoples and local communities, and relevant organizations to submit views on this issue by 21 March 2025. A total of 32 submissions were received, with 12 submissions received from Parties. Party submissions were received from: Brazil, Canada, Colombia, Egypt, European Union, India, Japan, Namibia, Republic of Korea, South Africa, Switzerland, and United Kingdom of Great Britain and Northern Ireland. Observer submissions were received from: Brazilian Bioinnovation Association, CGIAR Genebank Accelerator, Global Cosmetics and Personal Care Products Industry, GSS, Grupo FarmaBrasil, International Chamber of Commerce, International Indigenous Forum on Biodiversity, International Seed Federation, Japan Bioindustry Association, Keidanren Nature Conservation Council, London School of Economics and Political Science, Nascimento e Mourão Sociedade de Advogados, Permanent Senate Commission on Fundamental Issues of Biological Diversity of the German Research Foundation, Suzano, The Alliance of University and Non-University Biodiversity Research in Germany, The Grantham Research Institute on Climate Change and the Environment, The International Federation of Pharmaceutical Manufacturers and Associations, The Leibniz Institute DSMZ on behalf of the DSI Scientific Network, Third World Network, UK BioIndustry Association. All submissions can be viewed within notification No. [2025-114](#).
3. The Conference of the Parties at its sixteenth meeting also requested the Subsidiary Body on Implementation at its seventh meeting to consider this information and to prepare a recommendation to the Conference of the Parties serving at its seventeenth meeting regarding possible additional modalities for the fair and equitable sharing of benefits from the use of digital sequence information on genetic resources.

* Reissued for technical reasons on 23 June 2026.

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

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

4. Many of the submitters suggested amendments to the current modalities within decision [16/2](#), as well as referred to possible additional modalities than those currently within decision [16/2](#). The follow synthesis therefore refers to both possible additional modalities to the multilateral mechanism and amendments of the current modalities within decision [16/2](#). These are presented in the below thematic areas.

II. Synthesis of views on possible additional modalities of the multilateral mechanism

A. To take products/services into account

5. With relation to whether the multilateral mechanism should include a new modality to take products and services into account, the submitters were divided, both on the benefit of its inclusion, and on whether such a modality would replace or compliment the current sector-based approach. Submitters were also not conclusive on what was meant by a product or service using digital sequence information on genetic resources. For example, one Party questioned if a product or service using digital sequence information on genetic resources was limited to one that explicitly contained digital sequence information on genetic resources, or one developed using digital sequence information on genetic resources.

6. However, several Parties indicated a preference to introduce a new modality for products and services. One Party suggested a new modality should be created in addition to the current modalities, proposing a product-based approach that is intended to complement the sector-based approach and would include all economic activities beyond the sectors listed in enclosure I of decision [16/2](#). This submitter recognized that inclusion of a product-based contribution option would require further work on how to assess the value addition generated by the use of digital sequence information on genetic resources and suggests that the multilateral mechanism could build on relevant national access and benefit-sharing legislation. Furthermore, the contributions could be rated as a percentage of the net revenue from the sales of the products that were developed using digital sequence information on genetic resources directly or indirectly.

7. Furthermore, two additional Parties suggested a preference to introduce a new modality for products and services, but in place of the current sector-based approach rather than as an alternative modality. They pointed out that a transition to this approach would require a definition of digital sequence information on genetic resources.

8. Most observer submitters, in particular from representatives of the private sector, indicated that the modalities of the multilateral mechanism should allow for contributions calculated from those products or services that are developed utilizing digital sequence information on genetic resources, in place of the current sector-based approach. There were diverging views on how best to implement this, in particular to avoid double payment. Some responses indicated that a “charge” should be placed on the “first link” in the production chain which accesses digital sequence information on genetic resources during the research and development phase of a product. Others indicated that payment to the Cali Fund should be triggered with commercialization of a product or service developed specifically using digital sequence information on genetic resources, or on the revenue or profit of that product or service after successful commercialization. Last, one observer stated that a modality for products and services could be an additional modality, giving entities the option to contribute per-products should the entity only use digital sequence information on genetic resources in a small, specific part of their portfolio.

9. One submitter noted that the multilateral mechanism did not define terms such as “digital sequence information on genetic resources”, “use of digital sequence information on genetic resources” or “indirect use” and as such it may not be possible to objectively identify which products or services are subject to benefit-sharing under the multilateral mechanism. The submission called

for a clarification of these terms before the introduction of such modalities relating to product or services.

10. Several Parties' responses indicated against introducing a new modality here. The submitters noted that any such modality would require some form of tracking and tracing of digital sequence information on genetic resources in products, which is contrary to paragraph 5 of decision [15/9](#) ("recognizes that tracking and tracing is not practical"). Several submitters consider how to ensure that the revenue or profit of those products resulting from the use of digital sequence information on genetic resources can be calculated and verified and indicate this could involve tracking and tracing. Secondly, two Parties explicitly talked about tracking and tracing the origin of the specific digital sequence information on genetic resources within products, resulting in the use of the multilateral mechanism or the use of a bilateral mechanism based on domestic legislation.

11. Furthermore, it was indicated that any new modality to take product and services into account would likely be technologically intricate and costly.

12. Last, several submitters provided broader comments relating to the current sector approach and enclosure I of decision [16/2](#). One submission suggested the introduction of complementary guidelines to help entities identify, regarding paragraph 5 of the annex to decision [16/2](#), their use of digital sequence information on genetic resources and offered several definitions for this. Conversely, several Parties indicated the current list within enclosure I was sufficient and well-aligned with decision [15/9](#), while others called for a revision of the sector list to ensure alignment with decision [15/9](#). One Party and one observer noted that enclosure I did not consider the differences between industries within each sector, and as such call for the inclusion of sub-industry classification codes linked to the International Standard Industrial Classification of All Economic Activities, as referenced in paragraph 2 of enclosure I of decision [16/2](#).

B. Contribution rates

13. Several submitters referred to provisions found in paragraph 3 of the annex to decision [16/2](#). On the indicative contribution rates, several Parties highlighted that the current indicative contribution rates were too high and welcomed the study being commissioned as defined in subparagraph 5 (e). Two Parties noted that the study could address the share of revenue or profit coming from direct or indirect use of digital sequence information on genetic resources as this is variable among users, ranging from one hundred percent for specialised research and development-driven entities to minimal percentages for entities with a broad range of activities.

14. Several Parties also referred to the thresholds that determine which entity is expected to contribute to the Cali Fund. Two Parties suggested that all users of digital sequence information on genetic resources should be included, regardless of their size, given benefit-sharing obligations also include non-monetary benefit-sharing obligations (decision [16/2](#), annex, para. 2). One Party further expanded that this could be achieved through establishing a registration system of all users of digital sequence information on genetic resources. Another Party suggested that the multilateral mechanism could introduce a progressive scale with lower contribution rates for entities that did not meet the thresholds in paragraph 3 of the annex to decision [16/2](#). Last, a Party suggested that an alternative threshold could be based on the number of employees instead.

C. Non-monetary benefit-sharing

15. Of the submitters that referenced non-monetary benefit-sharing, most converged around the need for further modalities on non-monetary benefit-sharing in the multilateral mechanism. Specific proposals were put forward to improve modalities, and included: developing a list of indigenous peoples and local communities, as well as a list of other relevant protocols to refine the taxonomy of the Convention's clearing-house mechanism; developing indicators to quantify non-monetary benefit-sharing from commercial research; developing a matchmaking platform for research collaborations and technology-sharing initiatives, which would also serve as a platform to communicate the self-identified needs of indigenous peoples and local communities. Submitters

converged around the need to strengthen and expand the existing Convention on Biological Diversity structures to facilitate the sharing of non-monetary benefits from the use of digital sequence information on genetic resources.

D. No new modalities at the Conference of the Parties – COP 17

16. Several Parties stated that no new modalities were required within the multilateral mechanism at the seventeenth meeting of the Conference of the Parties. Several reasons were noted, one Party indicated additional modalities may reduce predictability or complicate the multilateral mechanism and instead considered after the first review of the multilateral mechanism as an appropriate time to consider additional modalities. A different Party recognized that they did not foresee the possibility of any new modalities delivering better than the current modalities but noted that the intersessional process might result in new or additional modalities for consideration by the Conference of the Parties. Another submitter indicated its preference to conduct a study to explore additional modalities instead.

17. Furthermore, on the role of the submission of views, several Parties stated that the process should address gaps in modalities within decision [16/2](#) and should not undermine or renegotiate the elements that are present within decision [16/2](#).

III. Additional elements of the submitters of views

A. Definitions of terms, certificates and scope of the multilateral mechanism

18. Several submitters referred to a lack of definitions of “digital sequence information on genetic resources” and suggested it created a lack of understanding of the multilateral mechanism scope. Other submitters suggested that “directly and indirectly benefit from the use of digital sequence information on genetic resources” or ‘use of digital sequence information on genetic resources’ required definitions. One Party recognized that to date there had not been a consolidated perspective on this topic within negotiations, while another Party suggested that guidelines could be developed to allow users to self-identify direct and indirect use.

19. Furthermore, several observers indicated that references to “without prejudice to national legislation” and “without prejudice to national access and benefit-sharing measures” created ambiguities and the potential for stacking of obligations between the multilateral mechanism and national access and benefit-sharing systems.

20. On scope of the multilateral mechanism, several observers highlighted that the multilateral mechanism should be expanded to include physical genetic resources.

21. Several submitters referenced certificates. One Party suggested that a list of Parties should be published who commit to recognize Cali Fund certificates as provided for in paragraph 15 of the annex to decision [16/2](#). Another Party highlighted that ensuring the provision of robust certificates was a priority for finalizing the delivery the Cali Fund. In addition, two observers suggested that a certificate could also be extended to cover other international access and benefit-sharing obligations.

22. Last, one Party indicated that legal clarity was the strongest incentive to participate in the multilateral mechanism. Developing definitions, the relationship between the multilateral mechanism and national access and benefit-sharing systems and certificates were areas identified that could afford legal certainty.

B. Database provisions

23. Several submitters referenced provisions relating to entities operating databases, tools and models that are dependent on digital sequence information on genetic resources, as referred to in paragraphs 10, 11 and 12 to the annex of decision [16/2](#). One Party suggested that, in relation to paragraph 11, Parties could consider introducing an identification system using blockchain to track access and use of the digital sequence information on genetic resource within public databases.

Another submission stated that when submitting sequences to databases, there should be an additional modality to indicate that the sequence is not subject to any restrictions that prohibit its sharing. Finally, one Party suggested that sequences uploaded to databases should also record the source of the genetic resource, alongside the current provision within subparagraph 10 (c) of the annex to decision [16/2](#).

24. Largely, there were general views relating to the need to ensure the multilateral mechanism does not interfere with access to data as this will have negative impacts on research and innovation.

C. General remarks

25. Several Party and observer submitters highlighted the importance of the private sector on the Steering Committee and noted that these representatives should be active participants with full membership.

26. Many of the submitters from both Parties and observers indicated their commitment to decision [16/2](#) and noted that the decision provided a major step forward in relation to the multilateral mechanism on benefit-sharing from the use of digital sequence information on genetic resources.
