

INTERNATIONAL CONSULTATION RECORD

TNFD Public Feedback and Institutional Survey

Two submitted institutional responses | 2026

CONTROLLED INSTITUTIONAL RECORD

This record registers two distinct EMJ.LIFE submissions to TNFD in 2026: a public-consultation comment letter on state of nature measurement and a completed response to the TNFD 2026 Status Report Survey. Supporting technical and official source documents are classified separately. No endorsement, adoption or framework affiliation is implied.

Prepared for EMJ LIFE HOLDINGS PTE. LTD.
External brand: EMJ.LIFE
Record date: 6 August 2026

1. Record Control

Field	Controlled value
Record family	EMJ.LIFE International Consultation Record
Institution	Taskforce on Nature-related Financial Disclosures (TNFD)
Records	EMJ.ICR.TNFD.2026.01 and EMJ.ICR.TNFD.2026.02
Record 01 type	Submitted Public Consultation Comment Letter
Record 02 type	Submitted Institutional Survey Response
Submitting person	Anderson Yu, Founder and CEO
Legal entity	EMJ LIFE HOLDINGS PTE. LTD.
Declared relationship	TNFD Forum Member
Jurisdiction	Singapore
Record status	Final - evidence-controlled

Classification rationale

The 27 May artefact is a formal comment letter submitted through a public feedback channel relating to a TNFD-GRI-SBTN discussion paper. The 23 June artefact is a completed institutional survey response. They differ in purpose, form, date and evidence, and must remain separate records.

Identity convention

The controlled legal-entity name is EMJ LIFE HOLDINGS PTE. LTD. The external brand is EMJ.LIFE. Historical capitalization in source exports is preserved only as source evidence.

2. Submission Register

Record	01	02
Date	27 May 2026	23 June 2026
Channel	Public feedback on publication	TNFD 2026 Status Report Survey
Subject	State of Nature Measurement	TNFD adoption and market experience
Form	Eight-page comment letter	Eight-page completed SurveyMonkey export
Evidence	Final PDF + editable source + completion screenshot	COMPLETE status + timestamps + answers + organisational consent
Classification	Submitted Public Consultation Comment Letter	Submitted Institutional Survey Response

Record strength

Record 01 has direct completion-screen evidence stating “Feedback submitted”. Record 02 contains an internally complete survey export recording the respondent, organisation, answer set, start and modification times, and confirmation of organisational permission to submit.

NON-ENDORSEMENT

TNFD Forum membership and submission of feedback do not imply that TNFD, GRI or SBTN endorses EMJ.LIFE, EMJ.NEXUS or any related protocol.

3. Record 01 - State of Nature Measurement

EMJ.ICR.TNFD.2026.01 | Submitted Public Consultation Comment Letter

The final comment letter responds to the TNFD, GRI and SBTN Discussion Paper on State of Nature Measurement and is dated 27 May 2026.

Core position

The response supports greater integration of state of nature measurement across TNFD, GRI and SBTN, while arguing that metric definitions alone are insufficient. Long-term usefulness also depends on whether information remains continuous, traceable and reusable across fragmented sites, supply chains, landscapes, reporting contexts and time periods.

Principal recommendations

- Introduce lightweight supporting metadata covering scope, baseline, period, source type, confidence, owner, use case and version history.
- Use a layered model spanning site, landscape or seascape, and value-chain contexts.
- Recognise progressive evidence maturity rather than treating data availability as binary.
- Differentiate internally generated, supplier, public, scientific, modelled and independently reviewed information.
- Design nature information structures for future digital exchange and machine readability.
- Maintain boundaries between generation, disclosure, target-setting, assurance, materiality and scientific interpretation.

CONTROLLED SUMMARY

EMJ.LIFE recommended strengthening the operational continuity and contextual traceability beneath state of nature metrics, without proposing a new reporting framework or replacing the authority of TNFD, GRI or SBTN.

4. Record 02 - TNFD 2026 Status Report Survey

EMJ.ICR.TNFD.2026.02 | Submitted Institutional Survey Response

The SurveyMonkey export is marked COMPLETE. It records a start time of 23 June 2026 at 10:52:12 and last modification at 11:11:28, with 19 minutes and 16 seconds spent.

Institutional profile recorded

- Organisation type: Corporate; headquarters: Singapore; primary sector: Technology & Communications; industry: Software & IT Services.
- Respondent role: C-Suite; organisation role: Report enabler.
- TNFD Forum Member: Yes; TNFD Adopter: No.
- Supports organisations undertaking nature-related assessments, including LEAP.
- Service description: Evidence Infrastructure, Governance Interoperability and Sustainability Data Infrastructure Provider.

Implementation findings reported

- Major barriers include limited internal capacity, weak senior sponsorship, perceived complexity, dataset uncertainty and competing priorities.
- Most challenging elements include dependency and impact measurement, risk quantification, target setting, ERM integration and framework alignment.
- Additional implementation guidance, practical examples, sector cases and interoperability support were requested.
- The response recommended stronger connections between LEAP assessment and ongoing, verifiable evidence continuity.

CONSENT EVIDENCE

The export records agreement to TNFD’s privacy policy and explicit confirmation that the respondent had organisational permission to submit the survey response.

5. Version and Artefact Control

Artefact	Controlled role	Treatment
Comment Letter-27May2026(5).pdf	Canonical final letter	Later 8-page export; matches editable source; calibrated institutional wording
Comment Letter-27May2026.docx	Editable source	Text corresponds to canonical final PDF
Comment Letter(1).pdf	Prior letter variant	Earlier, more prescriptive evidence-infrastructure formulation; retained as version history
feedback submitted-27May2026.png	Submission confirmation	Direct evidence that feedback was submitted through the publication page
TNFD Status Report survey.pdf	Canonical survey export	Complete response with timestamps, answers and consent
TNFD READY PROTOCOL.pdf	Internal technical document	Not evidenced as an attachment to either submission; excluded from submitted package

Canonical comment-letter decision

The PDF ending “(5)” is treated as canonical because it is the later export and matches the supplied 27 May DOCX. Compared with the earlier PDF, it uses more principles-based language, avoids presenting a formal five-level evidence model, and frames metadata as lightweight support rather than a common evidence structure.

Technical protocol boundary

The TNFD READY PROTOCOL is relevant to EMJ.LIFE's implementation architecture, but no evidence supplied links it to either formal TNFD submission. It must not be described as submitted to, approved by or recognised by TNFD.

6. Official Sources and Exclusions

Source	Role in this record	Boundary
TNFD Recommendations	Foundational framework source	Not an EMJ.LIFE submission
State of Nature Measurement paper	Consultation source evidenced by screenshot and letter	Official TNFD-GRI-SBTN publication
Invasive alien species metrics paper	Later official discussion paper	July 2026; not part of the May response
Risk assessment paper	Later official discussion paper	June/July 2026; not part of the May response
Environmental crime paper	Later official discussion paper	June 2026; not part of the May response

Permitted public description

In 2026, EMJ.LIFE submitted a public comment letter to TNFD, GRI and SBTN on state of nature measurement and separately completed the TNFD 2026 Status Report Survey, contributing an evidence-continuity and implementation-infrastructure perspective.

Restricted claims

- Do not state that TNFD, GRI or SBTN adopted the recommendations.
- Do not state that EMJ.NEXUS or the TNFD READY PROTOCOL is TNFD-approved or TNFD-endorsed.
- Do not present later TNFD discussion papers as subjects of the 27 May submission.

STATUS LANGUAGE
Permitted: submitted feedback; submitted comment letter; completed institutional survey response. Unsupported without further evidence: adopted, accepted, incorporated, validated, recognised or endorsed by TNFD, GRI or SBTN.

7. Integrity Register and Citations

Artefact	SHA-256
Canonical comment letter	b86fd112fd68b36c6218639d5bc9b9205baa2843855588b449f06370c62205ab
Editable comment letter	6e2057b7d7f50b2d72978e26385d312fd91c2734b806bcb0c185325731b96f26
Prior comment variant	b98d70781c9aa6c81448085e62a1f1fce0f64397b02993f5c8c952cc51aac4f1
Submission screenshot	5c5caef55e98d2c1ed73a2d9336cd04dddcbe58a9121c024f9ceb1cd80f144f2
Status Report survey	e60a27d3f063e71d1f229990c570e5b0397615a101e7a3a04691630778417d71
TNFD READY PROTOCOL	90c86c30e130467b87ed2b71ed1bd8ec9b438f0a6499315454aac77892aefc53

Recommended citation - Record 01

EMJ.LIFE (2026). Comment Letter on the TNFD, GRI and SBTN Discussion Paper on State of Nature Measurement. EMJ LIFE HOLDINGS PTE. LTD., Singapore. Submitted 27 May 2026.

Recommended citation - Record 02

EMJ.LIFE (2026). Response to the TNFD 2026 Status Report Survey. EMJ LIFE HOLDINGS PTE. LTD., Singapore. Completed 23 June 2026.

Governance statement

This controlled record was compiled from the supplied final and prior comment letters, editable source, submission screenshot, completed survey export and official supporting documents. Future updates should preserve the separation between submitted artefacts, internal technical materials and later TNFD publications.

END OF CONTROLLED RECORD