STATEMENT

Seventh meeting of the Subsidiary Body on Implementation (SBI-7): Digital sequence information on genetic resources

4 AUGUST 2026, NAIROBI – IFPMA welcomes the opportunity to address this agenda item. Our member companies support the objectives of the Convention and the Kunming-Montreal Global Biodiversity Framework.

As Parties consider possible additional modalities and the approach to review, we encourage a practical, evidence-based, and proportionate approach that addresses the mechanism's current shortcomings, while ensuring that contributions to the Cali Fund remain genuinely voluntary.

Decision 15/9 set out important criteria for any DSI solution: it should be efficient, feasible, and practical; generate more benefits than costs; provide certainty and legal clarity; not hinder research and innovation; and remain consistent with open access to data. These criteria remain essential.

Our sector contributes to benefit-sharing through its core mission of developing medicines, vaccines, and health innovations that reach people worldwide. IFPMA members also contribute across the Global Biodiversity Framework through responsible sourcing, environmental programs, and partnerships that advance health and biodiversity objectives, as evidenced in a new IFPMA report, *Healthy planet, healthy people.*

At the same time, the role and value of DSI are not uniform across research activities or sectors. They depend on the nature of the use, the quality of data infrastructure, and the degree to which DSI contributes meaningfully to products, services, or other benefits. Using sequence data as one scientific tool in a long research process is not the same as deriving a product's core value from it. A mechanism that does not reflect this diversity may be difficult to implement and may not achieve its intended purpose.

For this reason, modelled contribution estimates should be treated with caution. Simulated scenarios can illustrate possible outcomes, but should not be treated as reliable expectations of what any sector is likely to contribute in practice, particularly where they depend on assumptions about voluntary participation, ownership structures, and sectoral reliance on DSI.

Product- or service-based approaches offer a more targeted and proportionate alternative to a general revenue-based model where there is a demonstrable connection between DSI use and the benefit generated. However, no single modality will be appropriate for all sectors, uses, or business

models. The mechanism should allow for a range of practical voluntary options, rather than making any one modality the default or exclusive pathway. The review of the MLM at COP18 should address the current misalignment with decision 15/9.

Equally, participants should receive clear legal certainty in return for their engagement. Without assurance that a contribution to the MLM satisfies relevant national and other multilateral obligations, the mechanism will struggle to attract broad participation. Transparency and accountability in how funds are directed will also be essential to maintain confidence.

We look forward to continued work on the modalities in the lead-up to COP17 and encourage Parties to ensure the design remains open to refinement as these considerations are further examined. IFPMA remains committed to constructive engagement and stands ready to contribute practical expertise to this process.

Chemin des Mines 9
1202 Geneva
Switzerland

+41 22 338 32 00
info@ifpma.org
ifpma.org

@IFPMA
/IFPMA