

Reflection on Global Biodiversity Framework target implementation difficulties for private sector resulting from diffusion of responsibility and collective inaction after CBD COP16

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Abstract: This article examines the situations faced by the private sector in meeting the Kunming-Montreal Global Biodiversity Framework (KMGBF) targets following the 16th meeting of the Conference of the Parties to the Convention on Biological Diversity (CBD COP16) in Cali, Colombia. Drawing on the concepts of diffusion of responsibility and collective inaction, as well as the Triangle of Inaction and Spiral of Inaction theories, the discussion reveals how various actors - governments, businesses, and individuals - shift accountability to one another. Ultimately, the robust regulation and a thorough shift toward genuine and comprehensive actions to conserve biodiversity are essential for the private sector to translate policy into practical and sustainable outcomes.

Key words: CBD COP16, Kunming-Montreal Global Biodiversity Framework, private sector, sustainability, biodiversity conservation

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Introduction

The 16th meeting of the Conference of the Parties to the Convention on Biological Diversity (CBD COP16 or COP16) was held from the end of October to early November 2024, in Cali Colombia. While the event garnered praise for centering



Local Communities and Indigenous Peoples, it did not lay enough emphasis on the private sector, which is a key player to fight against the biodiversity loss, even though there was a Business and Biodiversity forum. Despite multiple global agreements stressing business engagement, companies often find themselves paralyzed by the phenomenon of diffusion of responsibility - assuming that governments, civil society, or other corporations will take the lead. This inertia is compounded by collective inaction, wherein stakeholders hesitate to act when others remain passive. In the wake of COP16, reflecting on how these dynamics hinder private-sector compliance with global biodiversity targets is crucial. By examining historical context, current policy trends, and existing theories, this article explores why businesses struggle to transform mission into tangible action.

CBP COP16 highlights

Colombia was intended to hold a “People’s COP”, for which local community and indigenous people were for the first time ever put in the center of the stage, and the world thus, knew much better their critical role in the biodiversity conservation. Further, the Green Zone attracted more than 700,000 participants to learn about biodiversity and its criticality and interaction with human beings (UNEP, 2024).

Besides the breakthrough success in terms of organization of the event for people, the COP16 also achieved many global consensus, such as the Cali Fund decision that stipulates that companies utilizing digital sequence information (DSI) from genetic biodiversity resources in their products must contribute a portion of their profits or revenues to the fund (WWF, 2024).

Additionally, COP16 was able to resume the discussion and add momentum on ecologically or biologically significant marine areas (EBSAs) identification, and facilitate moving forward regarding sustainable wildlife management and plant conservation, which are definitely adding blocks to the implementation of the Kunming-Montreal Global Biodiversity Framework (KMGBF) (CBD, 2024).

Despite its success in driving key agreements and outcomes, COP16 is also much criticized due to its overly intense discussion schedule and poor planning, which



resulted in the situation where the talk was extremely extended and the number of parties stayed could not reach the “quorum” needed to reach consensus on key issues (Carbon Brief, 2024).

In addition, the insufficient involvement of different stakeholders, observers, etc., in the discussion was also mentioned by some attendants. The issue was believed to have led to the situation that some discussions were ungrounded due to limited or even absent input of experts and stakeholders. This article discusses the importance of engaging and the difficulties faced by one key group of stakeholders - the private sector, which is mentioned both in the Aichi Biodiversity Targets (CBD, 2020) and KMGBF (CBD, 2024).

Historical context of private sector involving in biodiversity conservation

International biodiversity frameworks, or, to a larger extent, many international sustainable development goals related frameworks, have long acknowledged the importance of the private sector in achieving global sustainable development goals. The Aichi Biodiversity Targets 2011-2020 specifically highlighted the need for business involvement; for instance, Aichi Target 4 called on governments, businesses, and stakeholders to achieve or have plans in place for sustainable production and consumption by 2020 (CBD, 2010). In Aichi Target 4, business is mentioned in parallel with the governments and stakeholders, and the main point is to encourage all levels to start taking actions towards sustainable production and consumption. Interpretation may also direct the comprehension of this target to encouraging collaboration. The key shortcoming is that it does not indicate the main responsible body - governments, businesses, or any other stakeholders, which would largely lead to the issue of lack of focus and dilution of responsibility. Consequently, the progress of implementation of the corresponding target would be delayed or its importance could even be ignored.

The Kunming-Montreal Global Biodiversity Framework (KMGBF), adopted at COP15 and guiding discussions at COP16, attempts to provide clearer direction and stronger incentives for private sector action. Target 15 is also about both governments



and businesses. It states that the governments' work is to leverage legal, administrative, or policy approaches to encourage and enable businesses to start actions. For the business, they assess and disclose the relevant risks, communicate to consumers to promote sustainable consumption patterns, etc., and help draw at least a big picture of what to do regarding biodiversity for businesses and the private sector (CBD, 2022).

Biodiversity is becoming the second most important topic in the sustainability world after climate and the related Greenhouse Gas (GHG) emissions topic, especially after several keystone publications. For example, the first Global Assessment of Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released in 2019 sets the fundamental consensus of biodiversity and ecosystem services loss for the whole world and also defines a common language to measure, assess, and discuss, etc., the biodiversity issues (Ruckelshaus et al., 2020). Post-2020 Global Biodiversity Framework and above-mentioned KMGBF set renewed global targets and action guidelines according to the current condition.

In the regional policy, law, and regulation level, the European Union's Corporate Sustainability Reporting Directive (CSRD) entered into force in 2023 (European Commission, 2023), which affects about 40,000 EU & 10,000 non-EU companies (Ecoact, 2023). The EU Commission released the European Sustainability Reporting Standards (ESRS) as a delegated act, in which Biodiversity is one among five Environmental topics, namely, Climate change, Pollution, Water and marine resources, Biodiversity and ecosystems, and Resource use and circular economy. From then on, biodiversity became a topic to understand for the sustainability manager in businesses in the EU.

For businesses or the private sector, since 2020, the Science Based Targets Network (SBTN) has published many guidelines for the private sector to try to duplicate the success of the Science Based Targets initiative (SBTi), which is an assessment and net-zero target setting guidance for the private sector regarding climate and GHG emissions. The Taskforce on Nature-related Financial Disclosures (TNFD) is the biodiversity version of the Task Force on Climate-Related Financial Disclosures



(TCFD). Its beta version was launched in 2023, and the official version was launched in 2024. TNFD, as a reporting recommendation framework, successfully propagates the concept and lets the private sector recognize the importance of biodiversity by emphasizing the nature-related dependencies, impacts, risks, and opportunities. In addition, in 2024, the Global Reporting Initiative (GRI), the most followed sustainability reporting standard, updated their biodiversity standard; and the Carbon Disclosure Project (CDP), a well-recognized environmental impact disclosure standard and rating organization, included biodiversity topic data points.

All above-mentioned academic publications, policy, laws, regulations, guidelines, standards, and national-level ones not mentioned though, contribute to the current attention to biodiversity in the private sector.

Current situations

Despite the apparent and sound scientific results indicating that urgent actions from all levels should be taken to stop biodiversity loss and conserve biodiversity, the entire world has barely started effective actions compared to what are actually needed. Much attention and focus, regarding biodiversity conservation, have been put on some specific species, as urged and always reminded by the endangered lists, such as the IUCN Red List of Threatened Species. It is not to state that protecting these “star species” is not correct, but it is critical to think in a comprehensive way, when it comes to biodiversity conservation - biodiversity encompasses ecosystem diversity, species diversity, and genetic diversity, and the interaction of the three diversities. The phenomenon of paying too much attention to “star species” is easily and commonly observed in all levels, i.e., government, private sector, NGOs, and the public. Lack of awareness and scientific knowledge, especially about the priority of actions, is one of the fundamental factors that lead to the ineffective actions.

The decision framework Mitigation Hierarchy should be well respected at the global level to protect biodiversity. It provides a clear order of the actions to be taken, namely, Avoidance, Minimisation or Mitigation, Rehabilitation or Restoration, and finally Offsetting or Compensation (S Arlidge et al., 2018). The Science-Based



Targets Network (SBTN), a group of organizations providing guidance for the private sector and cities to measure and set targets to reduce impacts on nature, does not mention Offsetting or Compensation. Instead, it includes Transform as a key action pillar to encourage fundamental changes (SBTN, 2024). In short, the much more effort should be made to avoid impacts on biodiversity to achieve effective biodiversity conservation targets (Phalan B, Hayes G, Brooks S, et al., 2018). The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment on Biodiversity and Ecosystem Services, published in 2019, serves as the milestone scientific report that unifies the understanding of biodiversity and ecosystem services. The report categorizes the impacts on biodiversity into five pressures, also known as the five direct drivers of biodiversity erosion (IPBES, 2019). The private sectors, or to a larger extent, all human economic activities, shall measure the impacts on biodiversity as categorized by the five pressures, i.e., land- and sea-use change, direct resource exploitation, climate change, pollution, and invasive species. After knowing the exact pressures on biodiversity, the Mitigation Hierarchy should be followed to achieve the highest efficiency and effectiveness of biodiversity conservation actions.

Triangle of Inaction Theory and diffusion of responsibility

The commonly observed inaction, ineffective, or insufficient actions in the private sector can be explained by the Triangle of Inaction theory, constructed by Pierre Peyretou, to explain the situation faced by the world in the context of climate actions, that results in insufficient or even no action (Decathlon, 2024). The Triangle of Inaction theory includes three key groups: Government (the State / public authorities), the Private Sector (Companies), and Individuals. The theory depicts how three main groups tend to shift responsibility for environmental action onto one another. Each actor argues that another group holds the real power or should act first, creating a cycle of passivity and delaying meaningful change. This theoretical model vividly summarizes how diffusion of responsibility perpetuates collective inaction, leading to



inadequate follow-through on the Kunming-Montreal Global Biodiversity Framework at the practical and operational level.

The evolution of human civilization and development of society is accompanied by the progress of the division of labor and growth of information, especially since the beginning of the information era. In such progress, individuals is more and more educated and trained with specific knowledge in more segmented domains rather than by general education, which leads to the non-voluntary diffusion of responsibility in the social level. Diffusion of responsibility is a concept in the field of social psychology, describing a phenomenon where people are less likely to take responsibility for their actions or inactions when others are present, which is known as the bystander effect. In a larger context, i.e., at the societal level and even the whole world, the bystander effect is easily and commonly observed, when it comes to the sustainable development topics. The Triangle of Inaction is one example.

The spiral of Inaction is another theory that explains the current inaction situation towards climate change fact at the societal level by mentioning four logical steps (Bouman et al., 2022). The theory is specifically about climate action, but it is applicable to actions to halt biodiversity loss. First, climate action of biodiversity action may well threaten people's or a group of people's value, leading to "value conflicts". This "value conflict" can be interpreted as monetary or economic value and, apparently, relatively short-term value. Second, the motivated people may not know the means to make change, or they can also be faced with huge obstacles to taking real actions. Third, when people make decisions, one may not take the impact of the choices into consideration. Undeniably, people making decision can be the situation that individuals make choices on the consumption or purchase, but it can also be the decision maker either in the companies or the governments. In such context, only lack of awareness and knowledge and the bystander effect can explain the behavior of not taking into consideration the impact of the choices. Fourth, inaction may be contagious, meaning that after observing inaction, one can be encouraged to stay in inaction. Again, "one" can be both individuals and companies and governments. The diffusion of responsibility is not only observed at individual



level, but the companies always conduct benchmark activity to compare themselves to their direct or indirect competitors and even sometimes the leader in other fields to determine their own strategy or action plan. In this way, the inaction or ineffective or inefficient green-washing initiatives of the largest or the most prestigious companies are very likely to be considered as “good” references for their industry and their value chain. Such companies are very influential, and thus, the inaction or “canny” way of action would be passed throughout the whole private sector.

Taking responsibilities and starting meaningful actions

Taking responsibility seems not a trendy or fashionable world in today’s world of consumerism and hedonism. However, the human being’s economic activities have already passed the boundaries and limits within which we could say that our operations are sustainable and safe, as illustrated by the Planetary Boundaries theory (Richardson et al., 2023).

Taking responsibilities is based on the fact that an individual or decision maker, either in companies or governments, is aware of the status quo, not only about climate change or biodiversity loss, but more importantly, the relationship between human activities and the climate and biodiversity and ecosystem services, as commonly perceived in the dependency and impact pathways. The Triangle of Inaction Theory underscores the importance of education and raising awareness, believing that education and knowledge can break up the triangle of inaction.

However, as depicted in the Spiral of Inaction, one (individuals or companies) can still stay inactive due to many reasons, e.g., lack of interests, inaction of others, etc. (Decathlon, 2024) Therefore, being aware of the sole climate change or biodiversity loss information may not necessarily lead to actions. Taking meaningful actions is based on the comprehensive knowledge of human beings’ or companies’ dependency and impact on biodiversity.

Furthermore, the Governments (the State / public authorities), as one actor in the Triangle of Inaction Theory and a crucial functioning part of the whole society, should definitely take their own responsibility. Spiral of Inaction Theory states that



the governments and businesses can more easily overcome the barriers for individuals (Bouman et al., 2022). Indeed, the governments and companies are more exposed to the fact of dependency and impact and the relevant pathway information. Together, the Governments and the Private sector shall act in duo to tackle the urgent environmental problems that the world is facing. The Governments (the State / public authorities) should proactively make effective new laws and regulations with rigorous implementation in reality to enforce the change in the whole society (Mair et al., 2024), and the Private sector should follow the laws, regulations, and standards comprehensively, but not only convert the sustainability action into superficial marketing and communication activities, without taking any substantial actions.

Conclusion

Addressing the implementation difficulties faced by the private sector to meet the KMGBF targets requires breaking the cycle of diffusion of responsibility and collective inaction. Governments and intergovernmental bodies play a pivotal role by setting robust legal frameworks and holding businesses accountable. Yet companies themselves must move beyond symbolic gestures, adopting transparent reporting and science-based targets that demonstrate genuine progress. Overcoming this collective inaction demands clear regulations, consistent enforcement, and a broader cultural shift that values genuine biodiversity conservation over short-term gain. Ultimately, a collaborative effort - coupled with greater awareness of the real impacts of inaction - is essential to reverse the current trend.

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